

1st August 2024

Planning Department,
Kildare County Council,
Áras Chill Dara, Naas,
Co. Kildare.

Planning Department,
Meath County Council,
Buvinda House,
Dublin Road, Navan,
Co. Meath.

Re: Draft Maynooth and Environs Joint Local Area Plan 2025-2031

A chara,

Thank you for your authority's work on preparing the Draft Maynooth and Environs Joint Local Area Plan 2025-2031 (the draft JLAP).

The Office of the Planning Regulator (the Office) wishes to acknowledge the considerable and evident work your authority has put into the preparation of the draft JLAP.

As your authority is aware, a key function of the Office is the assessment of statutory plans to ensure consistency with legislative and policy requirements relating to planning.

The Office has evaluated and assessed the draft JLAP under the provisions of sections 31AO(1) and 31AO(2) of the *Planning and Development Act 2000*, as amended (the Act), and this submission has been prepared accordingly.

The Office's evaluation and assessment has had regard to the Kildare County Development Plan 2023-2029 (the Kildare Development Plan), and the Meath County Development Plan 2021-2027 (the Meath Development Plan), the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Regional Assembly (EMRA), and relevant section 28 guidelines.

Recommendations issued by the Office relate to clear breaches of the relevant legislative provisions, of the national or regional policy framework and/or of the policy of Government, as set out in the Ministerial guidelines under section 28. As such, the planning authority is required to implement or address recommendation(s) made by the Office in order to ensure consistency with the relevant policy and legislative provisions.

Observations take the form of a request for further information, justification on a particular matter, or clarification regarding particular provisions of a plan on issues that are required to ensure alignment with policy and legislative provisions. The planning authority is requested by the Office to action an observation.

A submission can include advice on matters that the Office considers would contribute positively to the proper planning and sustainable development of the area. The planning authority is requested by the Office to give full consideration to the advice contained in a submission.

Overview

The Office welcomes the preparation of the draft JLAP, having regard to the statutory requirements for same under section 19 of the Act. Maynooth has been identified as a Key Metropolitan Town under the RSES and the draft JLAP will play an important role in achieving above average growth rates to enable the town become an economic driver and strategic employment location within the Metropolitan Area Strategic Plan (MASP).

The settlement will also benefit from significant public investment in both transport and wastewater infrastructure and it is critical that the full benefits of this investment are realised, providing for socially and environmentally sustainable growth and a high quality urban environment for residents, workers, visitors and the university community.

In this context, the Office considers that the approach in the draft JLAP will positively contribute to compact growth by the implementation of the 10-minute settlement principle in the town through quadrant-based planning, that includes a key objective that all neighbourhood needs and services are within a 10-minute walk of all homes, consistent with the *Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities (2024)* (Compact Settlements Guidelines) .

The Office also welcomes the approach in setting out strategic residential sites supported by infrastructure for growth, including lands designated at Railpark as having residential

capacity for growth, consistent with the core strategies of both the Kildare Development Plan and Meath Development Plan.

The location of the proposed settlement consolidation site will also offer significant potential for town centre regeneration, given its scale and proximity to both the train station and the town centre.

The recommendations and observations below largely focus on supporting the delivery of this vision for the JLAP area, including achieving the MASP population and employment growth, co-ordination of housing and infrastructure delivery, realising the re-development of the Maynooth Central Settlement Consolidation Site (SCS), optimising the opportunity for Transit-Oriented Development (TOD) and active mobility infrastructure, and providing effective monitoring, implementation and co-ordination between the two local authorities.

Issues raised in relation to the capacity and safety of national roads and flood risk management will also need to be addressed.

It is within this context the submission below sets out eight (8) recommendations and two (2) observations under the following themes:

Key theme	Recommendation	Observation
Consistency with Regional, Spatial and Economic Strategy	-	-
Consistency with the Development Plan and Core Strategy	-	-
Population, residential development and compact growth	Recommendations 1 , 2 , 3 and 4	-
Transport and Accessibility	Recommendations 5 and 6	-
Economy and employment	Recommendation 7	-
Flood risk management	Recommendation 8	-
Climate Action	-	Observation 1
Implementation and monitoring	-	Observation 2

1. Consistency with Regional, Spatial and Economic Strategy

Section 19(2) of the Act requires that a local area plan shall be consistent with any RSES that applies to the area of the plan.

The RSES recognises the importance of Maynooth, a designated Metropolitan Key Town, in the region and county context with capacity to accommodate above average growth rates in the region with the requisite investment in employment creation, services, amenities and sustainable transport.

In this regard, the RSES identifies key strategic residential and employment sites along the Maynooth commuter line / DART. The draft JLAP identifies land at Railpark as having capacity for residential development, and a strategic employment site west of the existing university campus for New Technology and Research and Development employment with the potential to strengthen and promote economic development. The approach in the draft JLAP in relation to strategic residential and employment development is consistent with the RSES.

The Office also acknowledges National Policy Objective (NPO) 68 which allows for further population growth allocations to Key Metropolitan Towns, including Maynooth. This is in addition to the population / housing allocation under the core strategies contained in the Kildare Development Plan and Meath Development Plan. This is considered further in section 3 below.

Furthermore, the Office welcomes the approach in the preparation of a Local Transport Plan referred to as the Maynooth and Environs Area Based Transport Assessment (MEABTA), in parallel with the preparation of the draft JLAP, consistent with Regional Policy Objective (RPO) 8.6.

Overall, the Office welcomes the joint local authority approach in preparing a joint local area plan which will create opportunities for consolidation and sequential growth, and is consistent with RPO 4.35.

2. Consistency with the Development Plan and Core Strategy

Section 19(2) of the Act requires that a local area plan be consistent with the objectives of the development plan and its core strategy. This requirement also applies under section 20(5) of the Act.

The Office considers that the overall approach in the draft JLAP, which is ambitious in both residential and economic growth targets, and promotes consolidation and sequential development and regeneration within the central area, is generally consistent with the strategic objectives and core strategy Policy Objectives CS 01 and RE O18 of the Kildare Development Plan and CS OBJ 1 of the Meath Development Plan.

The Office also considers the housing targets and the policy objectives of the draft JLAP to be generally consistent with the development plans and their core strategies, except where otherwise specified below.

3. Population, residential development, and compact growth

As referred to above, the Office notes and welcomes the consistent approach of the core strategy and population growth projections in the draft JLAP with the Kildare Development Plan and Meath Development Plan.

Furthermore, NPO 68 allows for additional growth provision by means of 20% of targeted growth in the Dublin MASP being transferred to other settlements in the MASP, including Maynooth. Consequently, the MASP Implementation Group agreed that Maynooth is to receive an additional population of 10,000 on top of its core strategy allocation, of which the precise allocation shall be determined at JLAP stage.

The Office notes that the draft JLAP proposes to facilitate half of this population growth (i.e. 5,000 persons) within the current plan period. The Office accepts the evidence-based justification for this approach set out in section 3.2.1 of the draft JLAP, but stresses the importance of the draft JLAP realising this level of growth in a compact and sustainable manner.

In terms of the remaining 5,000 population growth, the draft JLAP should be clear how this will be planned for beyond the plan period in accordance with RPO 5.5 in relation to MASP housing and regeneration, and the key features in relation to housing delivery set out in section 5.7 of the RSES.

In relation to compact growth, the Office accepts that the overall approach is consistent with RPO 3.1 and RPO 3.2 to provide at least 30% of all new homes that are targeted in settlements, within the existing built-up footprints.

Recommendation 1 – MASP additional residential population provision

Having regard to:

- the growth targets for Maynooth under the core strategy of the Kildare County Development Plan 2023-2029 (Kildare Development Plan);
- the growth targets for the environs of Maynooth under the core strategy of the Meath County Development Plan 2021-2027;
- Policy Objective CS O1 of the Kildare Development Plan;
- RPO 5.5 in relation to MASP housing and regeneration and key features in relation to housing delivery set out in section 5.7 of the RSES; and
- Measure RAIL6 of the Greater Dublin Area Transport Strategy 2022-2042 (GDA Transport Strategy), providing for a new rail to the west of Maynooth, and RPO 5.3 of RSES,

the planning authorities are required to provide additional information and clarity in the draft JLAP in relation to the delivery and implementation of the future population allocation for Maynooth under the MASP of the RSES, including additional policy objectives as required.

3.1 Co-ordination of housing and infrastructure delivery

Chapter 4 of the *Development Plans, Guidelines for Planning Authorities (2022)* (the Development Plans Guidelines) outlines the approach for zoning that should be followed by planning authorities.

The Office welcomes the zoning objectives for additional residential zoned lands in St. Patrick's College (4.84 ha), and at Crewhill (15.08 ha), Rye Water Valley (9.89 ha) and lands at Lyreen Valley (5.47 ha). These lands are well located and will facilitate the compact and sustainable growth of the town in a sequential manner.

The Settlement Capacity Audit, which accompanies the draft JLAP, evaluates the infrastructure capacity of the proposed residential development sites and demonstrates either Tier 1 or Tier 2 status for the eight sites proposed as New Residential in the draft JLAP within County Kildare, and the residential zoned land within the Maynooth Environs, which is therefore consistent with RPO 4.2 and NPO 72(a-c).

However, following the Office's assessment and engagement with Uisce Éireann, constraints in relation to wastewater treatment were identified in respect of future capacity within the life of the JLAP.

As referenced above, Maynooth is identified as a key town for sustainable growth within the metropolitan area, with significant public investment in high quality public transport through DART+ West. It is critical therefore that the draft JLAP provides clarity regarding the timeframe for the delivery of the Maynooth Transfer Pipeline Project, including the upgrade of the main lift pumping station, and how development can be facilitated in the interim period consistent with the core strategies of the development plans.

Recommendation 2 – Co-ordination of housing delivery and infrastructure

Having regard to the co-ordination of housing delivery and infrastructure, and in particular to:

- Policy Objective CS O4 of the Kildare County Development Plan 2023-2029;
- Policy Objectives CS OBJ 1 and CS OBJ 12 of the Meath County Development Plan 2021-2027;
- RPO 4.2, RPO 10.1, RPO 10.3 and RPO 10.7 of the RSES;
- the *Development Plans, Guidelines for Planning Authorities (2022)*; and
- NPO 72a-c and Appendix 3 of the *National Planning Framework* for the co-ordination of land use zoning, infrastructure and services,

the planning authorities are required to consult with Uisce Éireann to ensure that the draft JLAP provides clarity regarding the timeframe for the delivery of the Maynooth Transfer Pipeline Project, including the upgrade of the main lift pumping station, and how development can be facilitated in the interim period.

3.2 Maynooth Central Settlement Consolidation Site

The proposed SCS is another preferred location for residential development. The location of the lands in the centre of Maynooth, adjacent to the existing train station and Royal Canal Greenway, also means that the development of the lands would not only be beneficial in terms of supporting more sustainable modes of transport, including walking and cycling, but also has the potential to provide a vibrant and high quality urban environment within the town.

The information and policy direction provided for the settlement consolidation site in section 4.8.4.1 and section 11.1 of the draft JLAP is welcomed and generally consistent with RPO 3.3 and RPO 4.26. The Office has, however, identified a small number of requirements to ensure consistency and to strengthen the policy framework.

The Development Plans Guidelines advise that SCS' have a critical role to play in achieving the core strategy and have the potential to deliver significant housing provision (e.g. a proportion of the settlement target) and, where appropriate, an assessment of the potential for housing yield should be undertaken. The Office considers therefore that the draft JLAP should be more transparent about the potential yield from the SCS distinct from the remaining Town Centre sites.

The density range for the development of this site will be a key consideration, both in terms of identifying that potential yield, and to guide future development.

Section 3.3 of the Compact Settlements Guidelines contains updated guidance on residential densities which includes Metropolitan Towns. Specifically, Policy and Objective 3.1 states:

It is a policy and objective of these Guidelines that the recommended residential density ranges set out in Section 3.3 are applied within statutory development plans and in the consideration of individual planning applications, and that these density ranges are refined further at a local level using the criteria set out in Section 3.4 where appropriate.

In respect of Centre and Urban Neighbourhoods of Metropolitan Towns (Table 3.3), the Compact Settlements Guidelines state *'It is a policy and objective of these Guidelines that residential densities in the range 50 dph to 150 dph (net) shall generally be applied in the centres and in urban neighbourhoods of Metropolitan Towns.'*

In respect of the development potential of the SCS, zoned Town Centre, page 187 of the draft JLAP states:

Aside from contributing to compact growth development in the town, the envisaged role of Maynooth Central SCS will be to maximise the potential of the site by creating a high quality urban environment that responds to its strategic location between St Patrick's College / Maynooth University and Maynooth Train Station (a future DART station).

While this is considered reasonable, it is not made clear that the policy intention is to seek higher than an average residential density on the SCS site, where appropriate and site context and conditions are suitable, and having regard to the density ranges for suburban areas referred to in Table 3.3.

The Compact Settlements Guidelines also note that the Government is advancing a range of land activation and active land management measures to ensure that the potential for urban development and regeneration in the built-up areas of cities and towns and at locations close to services and good quality public transport can be accelerated.

There is an opportunity, therefore, to supplement the information in the draft JLAP provided for the Settlement Consolidation Site with further details on the anticipated land activation measures required to facilitate the site's redevelopment. The Office advises that the inclusion of specific activation measures should focus on identifying and exploiting the opportunities provided through investment in public and sustainable transport infrastructure, including DART+ West and BusConnects.

Recommendation 3 – Maynooth Central Settlement Consolidation Site

Having regard to the provision of an appropriate policy framework to support the development of the Maynooth Central Settlement Consolidation Site, and in particular to:

- core strategy Policy Objectives CS 01 and RE O18 of the Kildare County Development Plan 2023-2029 (Kildare Development Plan) and CS OBJ 1 of the Meath County Development Plan 2021-2027 (Meath Development Plan);

- the core strategy housing allocations for Maynooth and Environs in the Kildare Development Plan and the Meath Development Plan;
- Policy Objective CS O5 for Compact Growth and Town Centre Renewal, of the Kildare Development Plan;
- Policy Objectives UD P2 for Compact Growth and Town Renewal and UD A5 for Town Centre Activation Measures of the Kildare Development Plan;
- Regional Policy Objective RPO 4.29 for Metropolitan Towns of the RSES;
- Policy and Objective 3.1, section 3.3.1 and Table 3.3 of the *Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities (2024)*; and
- the *Development Plans, Guidelines for Planning Authorities (2022)*,

the planning authorities are required to:

- (i) provide details of the housing yield from lands identified for residential development at the proposed Maynooth Central Settlement Consolidation Site (total estimated yield), and amend Table 3.9 Estimated Residential Capacity for Maynooth and section 11.1.3 Maynooth Central Urban Design Framework accordingly;
- (ii) include a policy objective supporting the proposed Maynooth Central Settlement Consolidation Site which states that the planning authorities will implement the density ranges for key towns in section 3.3.1 of the *Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities (2024)*; and
- (iii) identify the key land activation measures required to facilitate the redevelopment of the proposed Maynooth Central Settlement Consolidation Site and include this information in sections 4.8.4.1 and 11.1 of the draft JLAP.

3.3 Transit-Oriented Development

The Office welcomes the land use zoning objective, Transit-Oriented Development, to the west of Maynooth to provide for a new rail-based neighbourhood which will accommodate a sustainable urban extension to support the realisation of higher-density development.

However, in order to optimise the benefits of the TOD land use zoning objective, and to realise low car and car-free neighbourhoods that maximise opportunities for sustainable movement in accordance with RPO 5.3 and RPO 9.10 and the *Climate Action and Low Carbon Development Act 2015*, as amended (the Climate Act), the local authorities should review the precise location of the proposed TOD site to ensure that the zoning objective is located optimally in the context of existing and future rail infrastructure.

Recommendation 4 – Transit-Oriented Development

Having regard to the delivery of development in locations that can support more sustainable transport options, and in particular to:

- RPO 5.3 for Sustainable Transport and RPO 9.10 Placemaking and Active Travel of the RSES;
- the *Climate Action and Low Carbon Development Act 2015*, as amended and the goals of the *National Sustainable Mobility Policy (2022)*; and
- Measure RAIL6 of the Greater Dublin Area Transport Strategy 2022-2042, providing for a new rail to the west of Maynooth,

the planning authorities are required to review the zoning objective for the proposed Transit-Oriented Development site, as indicated in Land Use Zoning Map 11.1, relative to existing and future rail infrastructure to clearly demonstrate an evidence-based rationale to ensure that the optimum site is strategically reserved.

The planning authorities should consult with National Transport Authority regarding this recommendation.

4. Transport and Accessibility

4.1 Sustainable Mobility

The Office welcomes the publishing of the detailed MEABTA, consistent with RPO 8.6 of the RSES, and Policy Objectives TM A2 of the Kildare Development Plan, and MOV OBJ 1 of the Meath Development Plan, and within the context of the National Sustainable Outcome for sustainable mobility, mandatory climate change objectives under the Climate Act and the actions relating to transport under the *Climate Action Plan 2024*.

The Office notes that the draft JLAP supports ambitious mode share targets for Maynooth and environs, and that the MEABTA aligns with the GDA Transport Strategy in setting a 10% reduction target for car trips to work by 2040. Moreover, it is noted that the MEABTA also indicates that the modal split assumptions for Maynooth will require at least half of future journeys by new residents to take place by sustainable travel modes.

The Office also welcomes the identification of active travel measures (Table 7.3), and Table 7.2 which itemises the proposed permeability measures and phasing as presented in the draft JLAP. However, many of the proposed measures are listed as separate interventions, along the same overall route corridors or desire lines, with varying implementation timeframes.

This approach would be strengthened by having the measures grouped and prioritised as defined route proposals with end to end connectivity functions along strategic route corridors.

In respect of cycle routes, for example, this would include from the south west quadrant of Maynooth (Meadowbrook Road, Newtown Road and adjoining estates) to town centre areas (train station, retail, leisure facilities etc.). Although detailed design of the proposed interventions is not required at draft JLAP stage, greater clarity around the scope of cycle interventions would be helpful in determining the quality of overall facilities being proposed.

The draft JLAP envisages significant new development areas including residential, employment, community and tourism in the Maynooth Environs (County Meath). The proposed greenway will be critical for safe and attractive active travel connectivity to the town centre. However, the implementation mechanisms and delivery timelines should be reviewed and co-ordinated to ensure that the necessary infrastructure can be delivered in

full, and mitigate against any gaps or long-term delays in the completion of the project. This will require a clear strategy and agreement between the two local authorities.

For example, the Rye Valley key development area, C(6) New Residential, includes a segment of the greenway to be delivered in tandem with the C(6) development, for which a delivery schedule of medium to long-term is indicated which contrasts with the short to medium-term delivery schedule proposed for development area A2 within Maynooth Environs where the outer segments of the greenway are proposed.

Arising from the need for active travel interventions to be grouped into coherent end to end route proposals, the proposed greenway would benefit from a well-defined overall route providing connectivity from Maynooth Environs to Maynooth town centre with connectivity to the overall town cycle and pedestrian networks.

The Office considers that the proposed parking strategy would also benefit from a specific objective to ensure that demand for car parking is appropriately balanced against the need to promote more sustainable forms of transport, and the need to re-purpose existing car parking spaces to accommodate cycle parking, including for cargo bikes and e-bikes, as well as car share spaces and e-charging points.

Recommendation 5 – Integrated land use and transport planning

Having regard to the need to provide for sustainable transport and, in particular to:

- Policy Objective TM A2 of the Kildare County Development Plan 2023-2029;
- Policy Objectives MOV OBJ 1 and MOV POL 3 of the Meath County Development Plan 2021-2027;
- Regional Policy Objectives RPO 5.3 and RPO 4.33 of the RSES;
- the *Climate Action and Low Carbon Development Act 2015*, as amended, mandatory target to reduce greenhouse gas emissions by 51%, and the *Climate Action Plan 2024*, and associated actions including the *National Sustainable Mobility Policy (2022)* targets to reduce vehicle kilometres travelled per year and the *National Investment Framework for Transport in Ireland (2021)*; and

- Measure CYC6 of the Greater Dublin Area Transport Strategy 2022-2042, providing for Cycle Parking Strategies,

the planning authorities are required to:

- (i) include a specific objective for mode share targets for Maynooth, as specified in the MEABTA, included in section 7 of the draft JLAP;
- (ii) review and amend appropriately Table 7.2 and Table 7.3 of the draft JLAP to prioritise proposed interventions as defined route proposals with end to end connectivity functions along strategic route corridors;
- (iii) review, and amend appropriately, the policy framework for the proposed greenway from Maynooth Environs to the centre of the town, including provision of a clear policy objective, together with details of implementation, phasing, and co-ordination between the planning authorities; and
- (iv) include a specific objective in section 7 of the draft JLAP to prepare a Cycle Parking Strategy in tandem with the progression of the proposed car parking measures.

4.2 National Roads

Section 2.7 of the *Spatial Planning and National Roads Guidelines for Planning Authorities* (2012) require that planning authorities exercise particular care in their assessment and management of development proposals in the development plan relating to the zoning of locations at or close to junctions on the national road network.

While it is acknowledged that Policy Objective MATO 4.1 of the draft JLAP contains a policy objective which seeks to maintain and protect the safety, capacity and efficiency of the existing M4 motorway and associated Junction 7, and to protect the national road network from inappropriate new access points, the Office considers that the draft JLAP should review two sites zoned Industry / Office Park / Warehousing adjacent to Junction 7, which were not zoned in the previous plan, to reflect the aforementioned policy objective in the draft JLAP.

These additional land use zonings are raised as significant concerns in Transport Infrastructure Ireland's submission, which highlights that the expansion is contrary to

official national roads policy and is also contrary to the compact growth model advocated in national land use transportation planning guidance as reflected in the draft JLAP.

This will ensure that the strategic function of the national road network in the draft JLAP area is maintained consistent with RPO 8.3 of the RSES and policy objective MATO 4.1 of the draft JLAP.

Recommendation 6 - Policy objectives for national roads

Having regard to protecting the capacity and safety of national roads, and in particular to:

- Regional Policy Objective RPO 8.3 for Integration of Transport and Land Use Planning of the RSES;
- Policy Objective TM O88 for National Road Network of the Kildare County Development Plan 2023-2029;
- Policy Objective MATO 4.1 of the draft Maynooth and Environs Joint Local Area Plan 2025-2031;
- sections 2.4 and 2.7 of the *Spatial Planning and National Roads Guidelines for Planning Authorities* (2012); and
- the location of lands zoned for Industry / Office Park / Warehousing that are proximate to Junction 7 of the M4 motorway,

the planning authorities are required to:

- (i) seek to maintain the strategic function of the national road network and protect it from inappropriate new access points and the intensification of existing accesses onto or adjacent to national roads;
- (ii) provide evidence-based justification for the quantity and location of proposed employment generating land use zonings it plans, in such a way that demonstrates the national roads can continue to perform their strategic transport function into the future; and
- (iii) reconsider and appropriately reduce the quantity of land required to accommodate employment growth adjacent to Junction 7.

The planning authority should consult with Transport Infrastructure Ireland regarding the above.

5. Economy and employment

The Office welcomes the approach in the draft JLAP to economic development and employment, in particular the focus on developing Maynooth, a Key Metropolitan Town, as an economic driver and strategic employment location within the MASP.

Further, the joint strategic economic approach between both local authorities, in preparing a draft JLAP, creates opportunities for consolidation and sequential growth and moreover ensures that infrastructural requirements to support sustainable growth are coordinated and delivered.

The Office welcomes the strategic economic approach of the draft JLAP which identifies a sizable site (c. 44 ha) to the west of Maynooth and Environs, and is zoned Research and Technology. Further, the approach of the draft JLAP to designate lands in the Maynooth environs as Strategic and Employment Zones in County Meath at Moygaddy consolidates the settlement economically. This employment land bank is in the region of 57.3 ha.

RPO 4.27 is a significant policy objective for Key Towns as the policy objective requires that Key Towns act as economic drivers and provide for strategic employment locations to improve their economic base by increasing the ratio of jobs to workers. The strategy in the draft JLAP of identifying strategic employment land is consistent with RPO 4.27.

A key, and welcomed, ambition of the draft JLAP, is to increase the number of jobs based in Maynooth and to reach a jobs ratio (population and employment ratio) target of at least 1:1 to ensure growth in the number of jobs. The Economic Development Strategy of the draft JLAP (Table 6.1) targets 6,568 extra jobs for Maynooth and Environs by 2031. The Office notes that the jobs ratio in 2016 was 0.826, and the jobs ratio for 2022 is stated on page 94 of the draft JLAP as 0.816. However, the *Draft First Revision to the National Planning Framework (2024)* indicates a jobs ratio of 0.97 in 2022. The planning authorities are advised to engage with the Department of Housing, Local Government and Heritage regarding this discrepancy.

The Office welcomes the overall ambition in the draft JLAP in respect of economic development and employment, which includes, as referenced above, an ambitious jobs target (6,568 extra jobs) within the life of the JLAP, generally consistent with the approach in the RSES and the respective Kildare and Meath development plans. Notwithstanding the ambition to develop Maynooth as an economic driver and a strategic employment location within the MASP, the Office is concerned in relation to the deliverability of the draft JLAP's economic strategy within the 6-year period of the JLAP.

The Office notes however that the two largest land banks to the west of the town near Maynooth University, for a new Research & Technology Park, and at Moygaddy (Science and Technology) alone account for approximately 70% of the potential job creation for Maynooth and Environs during the life of the JLAP. Given the potential timelines involved in developing sites of this nature, the draft JLAP would benefit from further consideration of the anticipated land activation measures that will be required to facilitate the development of these lands and associated infrastructure in order to meet the employment targets set out in the draft JLAP.

The Office advises that the inclusion of specific activation measures should be cognisant of any transport strategies or plans prepared for the town.

In relation to the capacity of wastewater infrastructure in the area to service these lands, the Office reiterates the need for the draft JLAP to provide clarity in relation to these strategic employment sites (Recommendation 2 above).

Recommendation 7 – Strategic Employment Lands

Having regard to the overall economic strategy for Maynooth as a Metropolitan Key Town, and in particular to:

- Regional Policy Objective RPO 4.34 of the RSES;
- Policy Objective RE O18 of the Kildare County Development Plan 2023-2029;
- Policy Objectives ED OBJ 14 of the Meath County Development Plan 2021-2027;

- Policy Objectives EDO 1.1 and EDO 1.2 of the Maynooth and Environs Joint Local Area Plan 2025-2031 (JLAP); and
- section 6.2.5 of the *Development Plans, Guidelines for Planning Authorities* (2022),

the planning authorities are required to:

- (i) identify the key land activation measures required to facilitate the re-development of the strategic employment locations west of the university and Moygaddy to support their delivery within the life of the JLAP, supported by timely infrastructure delivery, and include this information in chapter 6 of the draft JLAP;
- (ii) review the Economic Development Strategy for Maynooth and Environs, based on the outcome of (i) above to ensure that the job creation target of the draft JLAP, is delivered within the life of the JLAP.

6. Flood risk management

The Office welcomes the preparation of the Strategic Flood Risk Assessment (SFRA) and accompanying plan-making justification tests to inform the policies, objectives and zoning objectives of the draft JLAP. The Office also welcomes the indication of Flood Risk Zones A and B on the land use zoning maps for the draft JLAP.

However, the Office notes the submission from the Office of Public Works (OPW) that lands zoned for Residential (A2), Community Infrastructure (G1) and Strategic and Employment Zones (E1) are affected by Flood Zone A and Flood Zone B and do not appear to have been subject to the Justification Test. The planning authorities are reminded that less vulnerable development is not appropriate in Flood Zone A unless all criteria of the Plan Making Justification Test have been satisfied.

In addition, the SFRA does not fully reflect the requirements of *The Planning System and Flood Risk Management Guidelines for Planning Authorities* (2009) (Flood Guidelines),, in a number of respects, in particular:

- Part 3 of the Plan Making Justification Test, as set out in the Guidelines, requires that Part A of a site specific flood risk assessment is carried out as part of the

SFRA and demonstrates that any flood risk to the development can be adequately managed. This is a requirement in order to satisfy the Plan Making Justification Test.

- For several of the Plan Making Justification Tests it has not been demonstrated completely how all criteria in respect of Part 2 has been met. There are number of zonings in peripheral areas with established development and it has not been demonstrated how the zonings comply with Part 2 of the Plan Making Justification Test. The planning authorities are advised to engage with the OPW to address this issue.

The Office advises that the SFRA requires review and updating which will have consequential implications for the draft JLAP. These issues will need to be addressed in order to ensure the flood risk is managed for the draft JLAP in accordance with the Flood Guidelines, and consistent with national, regional and county policy and objectives.

Recommendation 8 – Flood risk management

Having regard to flood risk management, and in particular to:

- Policy Objective IN O33 of the Kildare County Development Plan 2023-2029;
- Policy Objective INF POL 18 for Flood Risk for the Meath County Development Plan 2021-2027;
- RPO 7.12 for Flooding of the RSES; and
- the provisions of *The Planning System and Flood Risk Management Guidelines for Planning Authorities* (2009) (Flood Guidelines),

the planning authorities are required to:

- (i) review and revise the SFRA to ensure that the Plan-Making Justification Tests are carried out consistent with *The Planning System and Flood Risk Management Guidelines for Planning Authorities* (2009); and
- (ii) amend the zoning objectives in the draft JLAP (Land Use Zoning Map Ref. 11.1) to ensure that highly vulnerable (Flood Zone A and B) or less vulnerable (Flood Zone A) development is not facilitated under the zoning

objective where lands are located in Flood Risk Zone A/ B and have not passed the Justification Test.

The planning authorities should consult with the OPW in addressing this recommendation.

7. Climate Action

Section 2.2, Integrating Climate Considerations into the Joint Local Area Plan, of the draft JLAP deals specifically with climate action.

The Office welcomes the key vision of the draft JLAP for the creation of a low carbon town, which will be a compact, healthier and more inclusive settlement, and also more resilient to the effects of climate change. Key features of a low carbon town include land use, movement and transport, energy and natural heritage and inclusive communities.

In this respect, Maynooth is the designated Decarbonisation Zone within County Kildare. The Office notes that the draft JLAP aims to support the Kildare Local Authority Climate Action Plan 2024-2029 (Kildare CAP) and Meath County Council Climate Action Plan 2024-2029 (Meath CAP), and provide the framework for the transition of Maynooth towards a low carbon and climate resilient settlement.

In general, the overall approach is commended, and the inclusion of decarbonisation specific policy objectives (DO 1.1-DO 1.2) is welcomed, however the policy objectives themselves are at a relatively high-level.

There is an opportunity for the draft JLAP to include more specific policy measures and actions to give effect to and complement the objectives and actions from the respective Kildare CAP and Meath CAP which are specific to the Decarbonisation Zone and have a strong relationship to planning such as transport and the built environment, for example the Actions for Built Environment and Transport.

Observation 1 – Integrating climate action

Having regard to:

- Regional Policy Objective RPO 3.7 of the RSES;

- the *Climate Action and Low Carbon Development Act 2015*, as amended, mandatory target to reduce greenhouse gas emissions by 51%; and
- the Kildare Local Authority Climate Action Plan 2024-2029 (Kildare CAP) and the Meath County Council Climate Action Plan 2024-2029 (Meath CAP),

the planning authorities are advised to review and revise the draft JLAP, having regard to the respective Kildare CAP and Meath CAP to:

- (i) provide for alignment between the draft JLAP and the relevant climate adaptation and mitigation actions through the policy objectives; and
- (ii) include additional and more specific climate action policy objectives which relate to policy measures and actions in respect of transport and the built environment.

8. Implementation and Monitoring

Section 6.5 of the *Local Area Plans, Guidelines for Planning Authorities (2013)* states that planning authorities are encouraged to periodically review the success or otherwise of the implementation of the policies and objectives of a local area plan by effective monitoring systems such as reviewing the progress in securing the objectives of the development plan in accordance with section 15 of the Act.

The Office welcomes the inclusion of a chapter on Monitoring and Implementation in the draft JLAP. It is considered, however, that a more systematic approach to monitoring would better assist the planning authorities in implementing the key objectives / actions of the draft JLAP, for example by identifying lead responsibility and a timeline for implementation of actions. Further, and specifically in relation to active travel implementation, the phasing and implementation plans for the proposed Key Development Areas, listed in Table 11.5 would be strengthened by a specific objective within section 7 of the draft JLAP.

This is particularly important in the context of the co-ordination of your two local authorities in terms of delivering the vision for a compact and sustainable settlement as set out in the draft JLAP.

Guidance on monitoring and implementation is provided in chapter 10 of the Development Plans Guidelines. Further, the Newcastle West Local Area Plan 2023-2029 and the Draft Carlow-Graigecullen Joint Urban Local Area Plan 2024-2030 both provide examples of good practice in this area.

Observation 2 – Monitoring and implementation

Having regard to the duty and function of planning authorities under section 15(1) and 15(2) of the *Planning and Development Act 2000*, as amended (the Act), the planning authorities are requested to review the proposed provisions of the draft JLAP concerning implementation and monitoring to provide a more detailed systematic approach to monitoring the implementation of key objectives and/or actions of the draft JLAP.

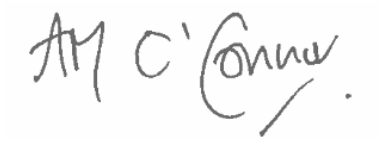
9. Summary

The Office requests that your authority addresses the recommendations and observations outlined above.

As you are aware, the report of the chief executive of your authority prepared for the elected members under section 20 of the Act must summarise these recommendations and the manner in which they will be addressed. Where your authority decides not to comply with the recommendations of the Office, made in the draft LAP and report, please outline the reasons for the decision in the chief executive's report.

Please feel free to contact the staff of the Office in the context of your authority's responses to the above, which we would be happy to facilitate. Contact can be initiated through plans@opr.ie.

Is mise le meas,

Handwritten signature of Anne Marie O'Connor in black ink on a light background.

Anne Marie O'Connor

Deputy Regulator and Director of Plans Evaluations
