

Kilcullen LAP 2014-2020



Chief Executive's Report on submissions/observations made on the Draft Kilcullen Local Area Plan 2014-2020

**Planning and Economic Development
Kildare County Council
Aras Chill Dara
Devoy Park
Naas
July 2014**



Section 1 Introduction

1.1 Introduction

This report focuses on the submissions and observations received from the public and statutory bodies following the publication of the Draft Kilcullen Local Area Plan 2014-2020.

1.2 Legislative Requirements

Under the Planning and Development Acts 2000-2014, the Chief Executive is required to prepare a report on the submissions or observations received and to make recommendations in relation to the proposed Local Area Plan.

1.3 Public Consultation

The Draft Kilcullen Local Area Plan was placed on public display from the 7th May until 17th June 2014. Copies were made available for inspection at Aras Chill Dara in Naas, and at Kilcullen Library and Heritage Centre. The draft LAP and all related documents were also available on the County Council's website.

Copies of the Draft Kilcullen LAP and associated documents were also sent to a range of statutory bodies including government departments and other agencies as required by the Planning and Development Acts.

In total 14 submissions were received on the Draft Kilcullen Local Area Plan during the statutory period. All written submissions received were acknowledged. They are summarised individually in this report. The response of the Chief Executive is given on the issues raised.

1.4 Content of Chief Executive's Report

The Chief Executive's Report must:

1. List the persons or bodies who made submissions.
2. Summarizes the issues raised by the persons or bodies in the submission or observations, including submissions from the Minister, the DTA and the Regional Authority.
3. Give the opinion and recommendation of the Chief Executive on the issues raised. In this regard the Chief Executive's response must take into account:
 - a) the proper planning and sustainable development of the area
 - b) the statutory obligations of any local authority in the area
 - c) any relevant policies or objectives of the Government or of any Minister of the Government.

1.5 Next Steps

Following consideration of the Chief Executive's report the Members may, as they consider appropriate, by resolution, make the Local Area Plan which would, if made, be a material alteration with or without further modification or they may refuse to make it. If the Members decide to materially amend the proposed Local Area Plan, a further period of public consultation will be necessary.

If the Planning Authority engages in a further round of public consultation for proposed material amendments to the Draft LAP, the planning authority must screen any proposed material changes to determine if Strategic Environmental Assessment or Appropriate Assessment or both are required of any of the material alterations and what period is necessary for the carrying out of any SEA or AA. This screening, and if necessary the SEA or AA, must be carried out before proceeding to the public consultation period.

The public display period of any material alterations is a minimum of 4 weeks during which submissions with respect to the proposed material alterations will be taken into account before the LAP is made. Following the public consultation period a further Chief Executive's Report is prepared and the members must consider the draft LAP, the alterations to the draft LAP any environmental reports and the Chief Executive's Report on any submissions received and decide whether to make the LAP with or without the proposed alterations.

In making the Local Area Plan, the elected representatives, acting in the interests of the common good and the proper planning and sustainable development of the area, must, in accordance with the 'Code of Conduct for Councillors' prepared under the Local Government Act 2001, carry out their duties in a transparent manner, must follow due process and must make their decisions based on relevant considerations.

Members in the consideration of the report are restricted to:

- considering the proper planning and sustainable development of the area to which the local area plan relates
- the statutory obligations of the local authority, and
- any relevant policies or objectives for the time being of the Government or any Minister of the Government.

Section 2 List of Persons and/or Bodies who made submissions

No.	Name of Person/Body
Subs No.	
1	Health and Safety Authority
2	EPA
3	National Roads Authority
4	BMA Planning, on behalf of George Browne & Co. Ltd.
5	Niall McDonnell
6	Geological Survey of Ireland
7	Dublin Airport Authority
8	Eirgrid
9	John Spain Associates on behalf of Aldi Store Ltd
10	Department of Education
11	Deputy Martin Heydon
12	National Transport Authority
13	Cllr Ivan Keatley
14	David Mulcahy Consultants Ltd Castlemartin Stud

Section 3 Detailed Considerations of Submissions Received

3.1 General Submissions

Sub No.	Name	Summary of Issues Raised	Chief Executive's Response and Recommendation
1	Health and Safety Authority	The plan has been noted.	<p>Chief Executive's Response Noted.</p> <p>Chief Executive's Recommendation No Change.</p>
2	EPA	<p>a) The agency welcomes that its previous submission has been taken into account. Reference is made to Section 3 of the SEA Screening Report which details the proposed rezoning of 16ha of Residential lands to agricultural zoned lands to comply with the provisions of the core strategy. The agency supports the number of robust environmental policies in Section 6.7 Water, Drainage and Environmental Services of the plan.</p> <p>b) Regarding the new residential zoned lands it is considered there would be merit in clarifying whether these new residential zoned lands are proposed to be developed on a phased basis over the lifetime of the plan.</p>	<p>Chief Executive's Response a) Noted</p> <p>Chief Executive's Recommendation a) No Change.</p> <p>Chief Executive's Response b) There is no requirement for phasing proposed in Kilcullen over the life of the plan. All the lands zoned for development meet the housing unit target that has been identified over the life of the plan in compliance with the Core Strategy of the Kildare CDP 2011-2017.</p> <p>Chief Executive's Recommendation</p>

		<p>c) It is indicated that it is a matter for the Council to determine whether or not any future proposed amendments/variations would be likely to have significant effects on the environment. This assessment should take into account the SEA Regulations Schedule 2A Criteria.</p> <p>d) It is indicated that any plans or amendments must ensure that adequate and appropriate infrastructure is in place or required to be put in place to service any development proposed and authorised during the lifetime of the particular Plan.</p>	<p>b) No Change.</p> <p>Chief Executive's Response c) Noted.</p> <p>Chief Executive's Recommendation c) The Council will comply with its statutory requirements in this regard.</p> <p>Chief Executives Response d) The adequacy of water, drainage and environmental services is necessary to facilitate the sustainable development of the town. These issues are addressed in various policies and objectives to provide for sufficient water, waste water drainage infrastructure to service the predicted requirements of the town over the plan period and beyond. Refer also to Policy WS1 & WW1 as set out below.</p> <p>WS1: <i>To provide water, sufficient in quantity and quality to serve all lands zoned for development in this plan and where this is not yet possible it shall be an objective of the Council to encourage only as much development as can be provided for, based on available water supply.</i></p> <p>WW 1: <i>To require developers to provide adequate wastewater service provision for any development</i></p>
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		<p>e) The requirements of Article 6 (Appropriate Assessment) Of the EU directive on the conservation of natural habitats and of wild fauna and flora, the Habitats Directive should be taken into account.</p> <p>f) Notice should be given to the following environmental authorities</p> <ul style="list-style-type: none"> • The EPA • The Minister for Environment, Community & Local Government • Minister for Agriculture, Marine and Food and the Minister for Communications, Energy and Natural Resources where it appears to the planning authority that the plan or programme, or modification of the plan or programme, might have significant effects on fisheries or the marine environment. • Where it appears to the competent authority that the plan 	<p><i>proposed where insufficient wastewater facilities are currently in place and to ensure that the requirements of the Eastern River Basin District Plan and associated Programme of Measures are met. In this regard developers should liaise with Irish Water prior to the lodgement of any planning application, in order to ensure that any proposals made comply with all necessary and relevant standards.</i></p> <p>Chief Executive's Recommendation d) No Change.</p> <p>Chief Executive's Response (e and f) Noted and agreed.</p> <p>Chief Executive's Recommendation (e and f) The Council will comply with its requirements in this regard.</p>
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		<p>or programme or amendment to a plan or programme, might have significant effects in relation to the architectural heritage or to nature conservation, the Minister for Arts, Heritage and Gaeltacht affairs,</p> <ul style="list-style-type: none"> • Any adjoining planning authority whose area is continuous to the area of planning authority which prepared a draft variation or local area plan 	
3	National Roads Authority	<p>The Authority welcomes the referral of the Draft LAP and provides the following comments:</p> <p>a) It is noted that although the M9 adjoins the LAP, the draft LAP does not specifically include policies and objectives concerning the protection of the efficiency, capacity and safety of the strategic national road.</p> <p>b) Reference is made to the Strategy for economic Development, Tourism and Employment outlined in Section 6.2.2 of the Draft LAP and the proximity of the zoned 'Industrial & Warehousing' lands to the M9, Junction 2, the Authority respectfully requests the inclusion of a specific provision in the LAP to safeguard the strategic function of the M9 and associated junction in the interests of clarity, consistency with the provisions of Section 6.4.2. Of the County Development Plan 2011-2017 and adherence to the provisions of official policy outlined in the DoECLG Spatial Planning & National Roads Guidelines. The Council may</p>	<p>Chief Executive Response</p> <p>a) & b) Noted and agreed. Include policy to address issues highlighted</p> <p>Chief Executives Recommendation</p> <p>a) & b) Include the following policy:</p> <p><i>To ensure that the strategic function of the M9 and the associated junction J12 are safeguarded through adherence to the provisions of section 6.4.2 of the Kildare County Development and to the provisions of the policy outlined in the DoECLG document 'Spatial Planning and National Roads - Guidelines for Planning Authorities'.</i></p>

		consider it appropriate to include such a provision in Section 6.6 of the Draft Local Area Plan.	
4	BMA Planning On behalf of George Browne & Co. Ltd,	<p>a) The proposed rezoning of lands identified on the maps attached from B: Existing Residential and Infill to I: Agricultural is deemed inappropriate for the following reasons:</p> <ul style="list-style-type: none"> • The planning history of the overall site where Kildare County Council previously granted permission for housing on the site. • The location of the lands in the context of adjoining established residential areas. • The location of the site within the Kilcullen development boundary where commercial, social and community services are easily accessible. • The availability of good roads and pedestrian access to the site via the existing road network. • The fact that services/infrastructure have already been put in place to serve the site. <p>It is indicated that the subject lands comprise the rear two-thirds of a residential development previously permitted by KCC in 1973. It is stated that the subject lands are not suitable to return to agricultural or amenity uses due to excavations and alterations to site levels undertaken as part of the initial phases of development. It is stated that it is the client's intention to complete the overall development subject to a new planning application.</p> <p>Commentary is also made on Core Strategy Implementation and the</p>	<p>Chief Executive's Response</p> <p>The principles of sequential approach were applied when considering which sites were to be rezoned in Kilcullen in order to comply with the Core Strategy of the Kildare CDP 2011-2017. This approach considered sites closest to the town centre first. Having reviewed the unit target figures for the area (incorrect figure noted for the Mart site) and the infrastructure that has been provided at this location, it is recommended that the site revert to the previous zoning of B: Existing Residential and Infill. This site extends to 3ha.</p> <p>Chief Executive's Recommendation</p> <p>Amend the Land Use Zoning Objectives map for the subject site from I: Agricultural to C: New Residential (3ha) and Update Table 11 <i>Sites identified for Residential Development</i>.</p>

		methodology for housing unit allocation.	
5	Niall McDonnell	<p>The Draft LAP is generally welcomed with the following observations:</p> <p>a) Reference Table 11: <i>Sites identified for Residential Development</i>, the Newbridge road site, the Cattle Mart Area (6.6ha). Eurospar Supermarket Main Street has a loading bay and car park for approximately 100 cars currently at this location and the indicative plan for this area make no reference to it.</p> <p>b) Reference to the Urban Design Brief for the Mart Lands. The breakdown of the Mart layout is detailed with 50% allocated to Commercial, 10% Community, 40% residential. It is considered impossible to build 198 dwelling units on the available area of 40%. Reference is also made to the number of landowners occupying lands within the design brief area.</p>	<p>Chief Executive's Response</p> <p>a) This is noted and the text of the Urban Design brief will be amended to include reference to the Eurospar site.</p> <p>Chief Executive's Recommendation</p> <p>a) Amend text in section 6.5.4.1 to include reference to Eurospar super market.</p> <p>Chief Executive's Response</p> <p>b) Having reviewed Table 11 in the draft LAP and the percentage of residential units envisaged at this location, (40% of the overall site area) it is noted that the figure of 198 is incorrect and will be amended to a more accurate figure. This figure will be approximately 80 units. The remaining unit provision will then be reallocated to other appropriate sites within the town.</p> <p>Chief Executive's Recommendation</p> <p>b) Amend the figure of 198 in Table 11 <i>Sites identified for Residential Development</i> to reflect the 40% allocated to Residential development as outlined in the Design Brief (circa. 80 units).</p>

		<p>c) It is noted that there is no location indicated for the likely arrival of an Aldi, Lidl or similar store with its typical surface car-parking arrangement.</p> <p>d) Reference is made to the granting of an extension/alteration to existing Car Showroom in the Neighbourhood Centre on the Naas Road. (Pl. Ref 13/273, granted 29.01.14)</p>	<p>Chief Executive's Response</p> <p>c) The design brief for the Mart Area is such that it could potentially accommodate such a structure subject to proper planning considerations. The layout plan and text will be amended to reflect 'retail uses'.</p> <p>Chief Executive's Recommendation</p> <p>c)Amend text of Section 6.5.4.1 to the following: <i>Uses permitted in this area include:</i> <i>Commercial/Retail Office and small business units</i> <i>Residential/Live/work units, Community Facilities</i></p> <p>Chief Executive's Response</p> <p>d) The Land Use Zoning Matrix in the draft Kilcullen LAP 2014 was altered since the Kilcullen LAP 2008 to align it with recently adopted local area plans such as Kildare, Newbridge and Maynooth. In the draft Kilcullen LAP, the provision of Motor Sales is not permitted on Lands zoned D: Neighbourhood Centre while Petrol Station is O: Open for consideration. However the existing petrol station and car showroom on the subject lands dates back to the 1970's so there is a long history of this type of use on the site and so is an established commercial use. There is provision in the Kilcullen LAP 2008 and the draft LAP 2014 for non-conforming uses where it states, '<i>Where extensions to or improvements to premises accommodating these uses are proposed, each shall be considered on its merits</i>'. However</p>
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6	Geological Survey of Ireland	<p>It is noted that Geological Heritage Data can be viewed on line on the GSI public data viewer.</p> <p>Reference is made to datasets and contact details on those</p> <p>It is noted that should a Geological Heritage site be identified in the plan area, KCC should contact Sarah Gatley, Head of the Geological Heritage and Planning Programme at sarah.gatley@gsi.ie for further information and possible mitigation measures if applicable.</p>	<p>Chief Executive's Response Noted.</p> <p>Chief Executive's Recommendation No Change.</p>
7	Dublin Airport Authority	No comment	<p>Chief Executive's Response Noted.</p> <p>Chief Executive's Recommendation No Change</p>
8	Eirgrid	Eirgrid is the national electricity Transmission System Operator and is mandated by the Government to develop, ensure the maintenance of and operate a safe, secure, reliable, economic and efficient transmission system while having due regard for the environment.	<p>Chief Executive's Response The policy framework for high tension power lines is currently being considered as a variation to the CDP. This will provide the overarching policy framework in this area.</p> <p>Chief Executive's Recommendation</p>

		<p>Reference is made to the ‘<i>Government Policy Statement on Strategic Importance of Transmission and other Energy Infrastructure</i>’ was published in July 2012 and the submission made on proposed Variation no. 3 of the KCDP 2011-2017 which welcomes the inclusion of reference to this document. Grid 25 is EirGrids strategy for the development of the national transmission grid over the next decades. The Gridlink project includes the identification of route corridor options to link Leinster and Munster. A zone of up to 5km in radius has been identified at Dunstown Co. Kildare within which route corridor options will be explored that will avoid environmental constraints as far as possible. The study area shown in Figure 2 attached includes the Kilcullen LAP lands.</p> <p>It is stated that EirGrid will seek to avoid environmental constraints as far as possible within the study area. Whilst not fully confirmed it is reasonable to consider that such constraints would include Kilcullen town.</p>	No Change.
9	John Spain Associates on behalf of Aldi Store Ltd	<p>a) As part of Aldi's investment programme, it is stated that Aldi has identified a requirement to develop a store in Kilcullen. The store has actively been searching for suitable and available sites in order to provide a store in the kilcullen area for the past number of years. It is considered that the review of the LAP provides an opportunity to pro-actively plan for the provision of a discount food store/small supermarket as part of the wider retail offer in Kilcullen. It notes that a store typically requires 0.6ha.</p> <p>The purpose of the submission is requesting that the appropriate planning framework is put in place within the forthcoming LAP to</p>	<p>Chief Executive’s Response</p> <p>a) The Urban design guidance has been prepared to assist in the planning process by setting out broad design parameters for the future development of both the Mart Expansion Area in the west of the town and the Neighbourhood Edge Lands in the east of the town. The design briefs are indicative only and some of the lands in them are zoned town centre providing for a range of uses. It is envisaged that the town centre expansion area, i.e. the Mart Expansion Area could accommodate a discount food store/small supermarket in the south west of the site area subject to proper planning</p>

		<p>support the development of a discount food store/small supermarket within the town. Policy R1 and R3 are welcomed in the draft LAP; this seeks to enhance the retail role and profile of Kilcullen. Reference is made to text in the LAP where expansion of the retail offer in the town centre is noted. It is submitted that the provision of a discount food store/small supermarket within the town is fully in accordance with this objective and the aforementioned policies of the Draft LAP.</p> <p>Reference is made to the opportunity sites identified in the LAP area. It is submitted that the design briefs set out for these sites do not identify the potential of these sites to accommodate a small supermarket. The opportunity sites are considered key sites in the town and it is considered its potential to accommodate a supermarket format of development should also be specifically identified within the design briefs for the site. This would be in accordance with the policies and objectives of the LAP which seek to enhance the retail and profile of Kilcullen.</p> <p>b) It is noted that the identified opportunity sites are subject to a number of different ownerships. It is considered that in accordance with the guidance set out within the Retail Planning Guidelines 2012 and Retail Design Manual that the Council should liaise with the relevant landowners to facilitate the delivery of these strategic sites. It is respectfully submitted that such an undertaking should be identified within the LAP.</p>	<p>considerations. As stated in response to submission 5 above, the text in the Mart Area Design Brief will be amended to reflect retail uses.</p> <p>Chief Executive's Recommendation</p> <p>a) Amend text in section 6.5.4.1 to make reference to a retail store and amend Figure 12 Mart Area Indicative Layout to indicate a potential location for a retail/commercial unit.</p> <p>Chief Executives Response</p> <p>b) Section 6.5.4 Urban Design Briefs sets out how the Planning Authority envisages these two areas could develop. While they indicate that the proposals are indicative only, they are nonetheless important in setting out a broad framework for future development. It is specifically stated that any application submitted on these lands will have to include a detailed design statement explaining how the proposed development addresses the relevant design brief for the area. Consultations with relevant owners can be undertaken as part of the pre-planning process.</p>
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		<p>c) Reference is made to the Zoning Matrix and the use shop (convenience) under Town Centre, existing residential, new residential and community and education purposes. It is submitted that the quantum of zoning objectives under which the use shop convenience is considered is appropriate. However it is requested to remove the specific reference in the Draft Plan to the provision of 'small convenience stores' on lands zoned for Objective D Neighbourhood Centre to ensure flexibility in the availability of sites within the town.</p>	<p>Chief Executive's Recommendation b) No Change.</p> <p>Chief Executives Response c) Not agreed. The purpose of Neighbourhood Centre Zonings is to serve the immediate needs of the local working and residential population rather than compete with similar retail uses in the established town centre. These zonings are not appropriate for larger convenience stores which should operate in or adjacent to the town centre core.</p> <p>Chief Executives Recommendation c) No Change.</p>
10	Department of Education	<p>The submission sets out the information used to calculate educational infrastructural requirements.</p> <p>Reference is also made to two documents that the Department has prepared in relation to site suitability for educational provision.</p> <p>It is stated that the lands adjacent to the existing schools should where possible be protected for possible future educational use to allow for expansion of these schools, if required subject to site suitability and agreement of the various stakeholders.</p>	<p>Chief Executive's Response</p> <p>Noted. There are 11.9 ha of land zoned E: Community and Educational. Adjoining the schools 9.7ha of lands are also zoned F: Open Space and Amenity which could potentially be used for recreational purposes in conjunction with the schools.</p> <p>Chief Executive's Recommendation No Change.</p>
11	Deputy Martin	a) Requests that adequate zoning is provided for Economic	Chief Executive's Response

	<p>Heydon</p>	<p>Development and Industrial/Commercial space. Reference is made to the recent announcement that the Kilcullen area is now included in the new Regional Aid Map to come into force from 1st July 2014. This will allow state agencies to provide further support if conditions are met to both existing and new businesses in the area.</p> <p>The number of empty commercial units in the town centre is noted, however despite this, it is considered that the council should ensure that there are sufficient larger scale areas around the town suitable for development into commercial/industrial space should the need arise up to 2020. Reference is made to the existing industrial areas on the Naas road and entering the town at Nicholastown which provide some opportunity for further development but it is considered the Council should ensure that sufficient scope exists to expand the amount of area available should the potential for large scale development and employment opportunities arise in the lifetime of this LAP.</p> <p>b) Need to ensure adequate open space and amenity areas for expansion of existing sports club space. Lands should be retained for Kilcullen GAA to expand its playing fields as the club has witnessed increasing membership over the years. Space should also be provided for potential new sports clubs that may establish in the future.</p>	<p>a) This Plan identifies 24ha of lands for Light Industrial/Industrial and Warehousing purposes. This excludes the number of vacant units that are also available in the Link Business Park. Furthermore, 9ha of town centre lands remain undeveloped which could accommodate commercial space.</p> <p>The quantum of zoned employment lands is considered adequate to cater for prospective employment opportunities during the life of the Local Area Plan and having regard to the scale and function of the town.</p> <p>Chief Executives Recommendation</p> <p>a) No Change.</p> <p>Chief Executive Response</p> <p>b)An area of land (2.9ha) zoned B:Existing Residential and Infill in the Kilcullen LAP 2008, adjacent the Kilcullen GAA club has been rezoned in the draft LAP to F: Open Space and Amenity.</p> <p>The Council’s Parks Department has advised that an area was required to develop a teen play facility. Therefore given the area’s location adjoining Open Space and Amenity and Community and Educational zonings, this site was considered</p>
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			<p>the most suitable. This area may also provide for an extension of the GAA club if needed in the future.</p> <p>Chief Executive's Recommendation b) No Change</p>
12	National Transport Authority	<p>It is submitted that the Authority has reviewed the draft LAP and is satisfied that all of the relevant items raised in its submission at issues paper stage have been addressed in the draft LAP. The draft LAP is consistent with the Authority's land use and transport planning policies, objectives and measures for the Greater Dublin Area, as set out in the Integrated Implementation Plan (2013-2018) and the Draft Transport Strategy (2011-2030).</p>	<p>Chief Executive Response Noted.</p> <p>Chief Executive Recommendation No Change.</p>
13	Cllr Ivan Keatley	<p>a) The LAP should reflect the need for an improved traffic light signalling system and improve the road layout at the town's main junction as a short term objective in order to relieve traffic congestion at peak times.</p> <p>b) The Kilcullen LAP should include a key objective for improved traffic and pedestrian safety particularly the straightening of roads, the addition of proper footpath and the provision of road safety/speed reducing measures where needed.</p>	<p>Chief Executive Response</p> <p>a) & b) Policies and objectives have been included in the draft Local Area Plan regarding the traffic movements, traffic congestion, footpaths and speed reducing measures in the town. These policies and objectives are considered adequate to address the concerns raised.</p> <p>Policies –</p> <p>MT3: <i>To monitor traffic movements within the town and to provide passive traffic calming measures at appropriate locations as the need arises.</i></p> <p>MT 5: <i>To ensure that the planning and implementation of all road and street works in Kilcullen accord with the</i></p>

			<p><i>principles set out in the Design Manual for Urban Roads and Streets (2013).</i></p> <p>MT 6: <i>To ensure insofar as possible that all transport facilities and services (including car parking) operational in the Kiccullen area are accessible to people with mobility needs. Car parking shall generally be provided in accordance with “Buildings for Everyone” 2002 published by the National Disability Authority, (or as maybe amended).</i></p> <p><i>Objectives</i></p> <p>MTO 1: <i>To prepare Traffic Management Plan for the town within the lifetime of the plan.</i></p> <p>MTO 2: <i>To investigate the role and use of a lower speed limit within the town centre area to improve safety for pedestrians, cyclists and vulnerable road users.</i></p> <p>MTO 3: <i>To implement a scheme consisting of appropriate traffic calming features on the R448 Naas Road in order to reduce vehicular speeds on the approach to the town.</i></p> <p>PCO 1: <i>To provide a high quality footpath network by improving pedestrian facilities through the refurbishment of footpaths, construction of new footpaths and the provision of appropriate crossing</i></p>
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		<p>c)The Kilcullen LAP should contain enough residential zoning to fulfil the local need and demand from the north of the county</p>	<p><i>facilities as required.</i></p> <p>SRO 6: <i>To implement safety and/or capacity improvements as necessary at the following junctions:</i></p> <p>c) <i>The R448 and R413 junction.</i></p> <p>d) <i>The R448 and Riverside Manor junction.</i></p> <p>Chief Executive's Recommendation</p> <p>a) &b) No Change</p> <p>Chief Executive's Response</p> <p>c) There is a statutory obligation on the planning authority to ensure that LAP's comply with the Core Strategy of the CDP. Section 6.1.2 outlines a unit target of 709 new residential units for Kilcullen over the period of the plan which includes 50% over zoning. A review of the Mart Expansion Area indicates a reduction in the overall residential component by 118 units. A review of the most suitably located alternative sites has been carried out to meet the unit target of 709 units.</p> <p>Chief Executives Recommendation</p> <p>b) It is proposed that 6.7additional hectares be zoned to meet the requirements of the Core Strategy. Refer to submissions 4</p>
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			and 14.
14	David Mulcahy Consultants Ltd Castlemartin Stud	<p>This submission relates to lands measuring 17.5 acres located on the west side of the R418, north of the River Liffey. This submission seeks the retention of zonings from the 2008 Kilcullen LAP. The subject lands can be divided into two separate parcels for the purpose of this submission, the northern lands (10 acres) relate to lands to the north, west and south of the Lui Na Greine housing estate and are zoned New Residential under the 2008 Kilcullen LAP. These lands are noted to be bordered by the Link Business Park, which is considered notable for its isolation from the town itself. The said lands also surround Lui Na Greine housing estate which is also notable for its location from the town. The lands also join an unnamed, partly finished housing estate to the south. It is considered that the proposed new zoning objectives do not make rational sense from a planning perspective as the agricultural zoning will only serve to further isolate the Lui Na Greine housing estate and Link Business park.</p> <p>The southern lands (7.5 acres) relate to elevated lands in the town centre on the north bank of the river and were zoned Town Centre under the 2008 LAP. The southern lands are bordered by the River Liffey to the south and Hillcrest housing estate to the east and north.</p>	<p>Chief Executive Response</p> <p>a) The principles of sequential approach were applied when considering which sites were to be zoned in Kilcullen in order to comply with the Core Strategy of the Kildare CDP 2011-2017. This approach considered sites closest to the town centre first and then worked its way out towards the town boundary. Therefore suitable sites in close proximity to the town centre lands in Kilcullen were retained to meet the housing unit target of 709 units to 2020. However, having reviewed the unit target figures for the area, it is considered that part of the northern lands on the Naas road, 3.7ha, south of Lui na Greine back to C: New Residential Lands. The remainder of the subject lands at this location are not required and will remain as in the draft LAP, I: Agricultural.</p> <p>The rezoning of the southern lands from A: Town Centre to F: Open Space was not solely on the basis of requiring site specific flood risk assessment in the event of a development proposal on site. As mentioned above, the residential unit target for Kilcullen must comply with the Core Strategy of the Kildare CDP 2011-2017 and must be based on the principles of the sequential approach. This site was not considered in the</p>

		<p>It is stated that rezoning of the Town Centre/Residential Infill lands adjoining the town centre is highly unusual from a planning perspective. It acknowledges that any development of the lands is subject to a site specific flood risk assessment and rezoning these lands in the absence of any detailed appraisal is premature. Reference is made to the flood maps on Myplan.ie which show only the very closest portion of the site to the river is subject to flooding. Reference is made to section 4.23 of the Flood Guidelines and the procedure of a Strategic Flood Risk Assessment.</p> <p>Reference is also made to</p> <ul style="list-style-type: none"> • Kilcullen’s hierarchy in the National Spatial Strategy, the Regional Planning Guideline’s and the KDCP2011-2017 where it is noted that it is clear that Kilcullen has been specifically identified as a town for future growth, forming a key part of a regional development centre in Kildare. • the housing allocation identified in the plan where the number of permitted units is considered as part of the housing target figure of 709 dwellings from 2014-2020. It is submitted that given the absence of credit to many potential developers there can be no guarantee that these 151 dwellings will be built. It is also submitted that the 30ha of zoned land devoted to meeting the housing target includes 13ha of town centre zoned lands which will contain a range of uses. 	<p>residential figures due to its elevated nature and the availability of more appropriate town centre sites which are currently under utilised at present.</p> <p>Chief Executives Recommendation</p> <p>a) Amend the Land Use Zoning Objectives map for part of the northern lands, 3.7ha from I: Agricultural to C: New Residential and update Table 11 Sites Identified for Residential Development. Retain previously zoned town centre lands as open space and amenity as proposed in the draft LAP.</p>
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