



The OPR notes and wishes to acknowledge your authority's extensive work in undertaking the necessary background research and analysis and preparing and publishing the written statement and maps contained in the draft local area plan (LAP) for Leixlip.

The Office has assessed the draft LAP above under the relevant provisions of the Planning and Development (Amendment) Act 2018 to ensure consistency with legislative and policy requirements relating to planning.

As the preparation of the draft LAP pre-dates the establishment of the OPR and the Office is developing an overall assessment methodology for statutory plans, the submission below has been prepared to provide a high-level input to the statutory plan procedure.

1. Consistency with the Hierarchy of Statutory Plans

Statutory observations and recommendations from the OPR are aimed at ensuring broad policy consistency between national, regional and local levels of the statutory planning policy hierarchy, which in the case of the proposed local area plan will include the National Planning Framework, Regional Spatial and Economic Strategies and your authority's county development plan.

It is noted that the Draft LAP was published in advance of the finalisation of the Draft Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Regional Assembly area which must further articulate the national policies and objectives of the National Planning Framework (NPF) at a regional level under the Planning Act.

The RSES for the Eastern and Midland Regional Assembly area is intended to provide strategic direction for the formulation of subsequent county/city development plans in ensuring a strong and consistent alignment between national and local level planning policies.

As your authority will be aware, the current County Development Plan must be reviewed in order to ensure consistency with the NPF/RSES and the appropriate statutory planning procedures must be observed as necessary, whether the outcome of that review concludes that either a variation or the preparation of a new county development plan is required.

In turn, the varied or reviewed county development plan will prompt similar reviews of local area plans to ensure their consistency with the varied or new county development plan.

Therefore, and having regard to the above, the written statement of the draft Leixlip LAP should contain an objective that makes it clear that the LAP will be subject to review in the context of the next iteration of the County Development Plan and should cover the 2020-23 period only so as to ensure that it is programmed for review in a satisfactory and timely manner.

Recommendation 1: The Office recommends that your authority inserts a written objective into Draft Leixlip Local Area Plan specifying that it is for the 2019-23 period only and will be subject to a review procedure subsequent to the amended/reviewed Kildare CDP that has been assessed for consistency with the Eastern and Midlands RSES.

2. CDP Core Strategy and Proposed Residential Zonings

Table 4-1 of the Draft LAP indicates zoned lands with an overall potential for 3,315 housing units to be delivered in Leixlip which conforms to the core strategy provisions with regard to population and housing for Leixlip in the Kildare County Development Plan 2017-23.

However, the Office also notes that as of March 2019, an estimated 148 new homes were substantially completed in Leixlip since 2016, highlighting a significant divergence between actual housing delivery and the CDP core strategy intended growth for the town.

As noted in Table 12-1 of the Draft LAP, there are significant constraints on the development of new housing areas identified including transport and wastewater network infrastructure deficiencies. The phased development of the Confey lands are also noted (per Appendix A).

In light of the imminent assessment of the CDP for consistency with the Eastern and Midlands RSES and the truncated timescale for the LAP specified above, it is considered that the phasing of new development should be more clearly identified in the LAP.

The infrastructural assessment undertaken by the Council in the preparation of the LAP should be utilized to clearly identify the spatial areas intended to develop initially within the LAP as well as areas where development may have to be programmed for a subsequent period pending the resolution of particular infrastructural deficiencies.

In this manner the coherent spatial development of the town will be ensured and the leveraging of existing infrastructure to support new housing will be maximized.

Recommendation 2: The Office recommends that your authority includes objectives for appropriate phased development of new or future development areas, with the areas located closest to the town centre and or with infrastructure capacity identified for the first phases, and areas that will require the resolution of particular infrastructural constraints identified for development phases in the medium or longer term.

3. **Next Steps**

The Office requests that your authority addresses the specific recommendation outlined above in the context of the provisions of Section 31AO(3)(a) of the Planning Act in order to ensure that the draft LAP is consistent with relevant national policy obligations, guidelines and legislative requirements.

The report of the Chief Executive of your authority prepared for the elected members under Section 20 of the Act must summarise the recommendations above and the manner in which they are to be addressed.

In addition, your authority is required to notify this Office within 5 working days of the making of the local area plan and send a copy of the written statement and maps as made.

Where the planning authority decides not to comply with the recommendation of the Office or otherwise makes the plan in such a manner as to be inconsistent with the recommendation made by the Office, then the Chief Executive shall inform the Office and give reasons for the decision of the planning authority.

Such notice requirements enable the Office to consider the matter further as regards the making of any recommendation to the Minister in relation to a Direction that may be required under Sections 31AO and 31AP of the Act.

Yours etc.

Gary Ryan

Director