



Kildare Public Participation Network

Kildare PPN Submission Kildare County Development Plan 2023 - 2029

Kildare Public Participation Network
Community & Culture
Level 7, Áras Chill Dara
Devoy Park
Naas
Co. Kildare

TABLE OF CONTENTS

Introduction	3
Chapter 1 - Introduction and Strategic Context	5
Chapter 2 - Core Strategy & Settlement Strategy	6
Chapter 3 – Housing	8
Chapter 4 - Resilient Economy & Job Creation	10
Chapter 5 - Sustainable Mobility & Transport	11
Chapter 6 – Infrastructure & Environmental Services	14
Chapter 7 – Energy & Communications	15
Chapter 9 – Our Rural Economy	17
Chapter 10 – Community Infrastructure & Creative Places	20
Chapter 12 – Biodiversity & Green Infrastructure	23
Chapter 13 – Landscape, Recreation & Amenity	33
Chapter 16 – Implementation & Monitoring Framework	34
References	35

INTRODUCTION

Kildare Public Participation Network (Kildare PPN) was established on foot of the Report of the Working Group on Citizen Engagement with Local Government published in 2014, which recommended greater input by communities into decision making at local Government level. The Local Government Reform Act 2014 provided for the formal establishment of PPNs and they are now operational in all Local Authority areas.

Kildare PPN has 841 diverse member groups in the community and voluntary, social inclusion and environmental pillars in Kildare. The primary purpose of Kildare PPN is to enable PPN member groups to input into and have their voices heard within the formal decision-making structures of Kildare County Council. The PPN is now the main way that Local Authorities connect with groups active in their area. Kildare PPN currently have representatives on the Local Community Development Committee, the Joint Policing Committee, and the Strategic Policy Committees with Kildare County Council. Kildare PPN therefore provide a mechanism to facilitate the two-way flow of information between the Local Authority and their groups to influence policy development and the delivery of services to the wider community.

In March 2021 Kildare PPN made a submission to Kildare County Council during the pre-draft planning stage and appreciative that many of our proposals were taken on board and included within the Draft County Development Plan.

Kildare PPN welcomes the opportunity to make a further Submission on behalf of its membership to the Kildare County Development Plan 2023 -2029.

Kildare PPN would also like to take this opportunity to commend Kildare County Council for the development of the Draft Plan, and in particular, the Podcast series that was launched during the consultation stage of the CDP, which our membership found really informative and innovative.

CONSULTATION

This submission was compiled through various consultation methods with the membership of Kildare PPN. On the 13th of April 2022, a dedicated online workshop was held with Kildare PPN members to gather suggestions and recommendations for the draft County Development Plan. The consultation included an overview of the Draft County Development Plan by Senior Executive Planner, Caroline O'Donnell, along with a questions and answers session, followed by an open discussion amongst our members. Proposals were also accepted for this submission via Kildare PPN's survey consultation portal for member groups who were unable to attend the consultation session. Data was also gathered through previous Kildare PPN consultation sessions.

INTRODUCTION AND STRATEGIC CONTEXT

1.3 Profile of Kildare

As the Census Preliminary Population Publication is due to be published in June 2022 and the detailed Census 2022 product list and timetable scheduled for the second half of 2022 (Census 2022: Dissemination Strategy) a provision should be made to update the Profile of Kildare with the 2022 data and allow certain amendments throughout the County Development Plan if required, contingent on the 2022 Census Data.

1.8 Strategic Vision

Kildare PPN propose the following amendment to the Strategic Vision:

*To build on the strengths of the county in order to improve the quality of life of all residents, through the creation of high-quality job opportunities, by the provision of high-quality residential development supported by adequate community infrastructure, through the provision of a high quality sustainable transport network, by healthy placemaking and transformational regeneration, by supporting the transition to a low carbon climate resilient environment, by embracing inclusiveness, ~~and to by enhancing our natural and to~~ by enhancing our **built environment, and enshrining the importance of conserving, restoring and protecting Kildare's biodiversity for future generations.***

1.6 Sustainable Development Goals

Kildare PPN propose that information is included in the Plan on where the UN Sustainable Development Goals (SDGs) align with the National Planning Frameworks National Strategic Outcomes (NSOs).

CORE STRATEGY AND SETTLEMENT STRATEGY

2.1 Overall Aim

Kildare proposed a slight addition to the overall aim:

*To provide for the delivery of an additional 9,144 housing units to accommodate an additional 25,146 people by the end of the Plan period, through the delivery of sustainable, compact settlements supported by a commensurate level of physical, ~~and~~ social **and green** infrastructure to mitigate against climate change.*

Core Strategy and Settlement Strategy

Proposed additional objective:

Ensure that the future growth and spatial development of County Kildare does not further undermine Kildare's protected habitats and species. Engage with NPWS and other relevant stakeholders to urgently progress management plans for Natura 2000 sites and other protected sites in the County. Engage with all relevant stakeholders, including NPWS and national experts in flora and fauna, including the NGO sectors (for example, BSBI County Recorders) to identify and protect high nature value habitats and sites for threatened species in County Kildare. Tangibly commit to meaningfully tackling Biodiversity Loss in County Kildare by providing additional resources for the employment of an additional suitably qualified staff member dedicated to the conservation and protection of Kildare's habitats and species, compiling an inventory of High Nature Value sites and protected species, community education and engagement on meaningful biodiversity actions, and ensuring that funding for biodiversity is directed to meaningful outcomes.

Kildare PPN also suggest the following additions/amendments:

CSO 1.13 - *Engage with public infrastructure providers including Irish Water and local communities to provide serviced sites with appropriate infrastructure for people to build their own homes in designated towns and villages, subject to all relevant planning and environmental criteria as a sustainable alternative to one off housing. **Develop Housing Need Demand Assessment (HNDA) tool for Kildare and project the need for single housing in the***

countryside by the end of 2023 in line with National Policy Objective 20, Planning Framework 2040

*CSO 1.17 - Continue to work with the educational institutions throughout the county and Solas, in order to further enhance the already existing highly skilled labour force in Kildare and to encourage improvements in the labour force to include the development of specific apprenticeships in the technology, **renewable technologies and retrofitting apprenticeships**, tourism, youth and childcare sectors during the lifetime of the plan to enhance and develop the agility of the workforces in those sectors.*

CSO 1.18 - ~~To consider aligning~~ Align the Kildare County Development Plan 2023-2029, with the up-to-date population from the forthcoming Census, where there are verified material population differentials to those in Table 2.8 of the Plan, by way of a statutory variation pursuant to Section 13 of the Planning and Development Act 2000 (as amended).

HOUSING

3.3 Policy Context

Kildare PPN recommend the following policies are added as guidance documents:

- Sustainable Rural Housing Guidelines (2005)
- Derelict Sites Act, 1990 (as amended by the Planning and Development Act, 2000)
- Urban Regeneration and Housing Act 2015

HO O13	<p>Support and promote the renovation and re-use of obsolete, vacant and derelict homes, through the following measures:</p> <ul style="list-style-type: none"> (i) Encourage the redevelopment and reuse, including energy retrofitting, of the existing housing stock. (ii) Support Government programmes and incentives to bring empty homes into use through various means, including potential expansion of the Town and Village Renewal Scheme as referred to in the Government's Rural Development Policy 2021-2025. (iii) Maximise the effective use of local authority housing stock and minimise local authority housing stock vacancy, including through effective refurbishment and retrofitting of older stock where appropriate. (iv) Promote the conversion of vacant properties into new social and affordable homes through schemes including the Repair and Leasing Scheme and the Buy and Renew Scheme. Kildare County Council will endeavour to promote these schemes and encourage owners of vacant properties to avail of these schemes, directly or in co-operation with Approved Housing Bodies.
-------------------	--

Proposed additional actions:

- *Action 1: Develop a staged plan to populated and actively manage the Vacant Sites Register (VSR) over the lifetime of this plan.*
- *Action 2: Actively enforce the Urban Regeneration and Housing Act 2015 using the VSR.*
- *Action 3: Actively enforce the Derelict Sites Act, 1990 (as amended by the Planning and Development Act, 2000) using the VSR.*

3.11.1 Older People

Proposed additional objective:

Interrogate the Property Interest Register and, where feasible, work in partnership with the Land Development Agency (LDA) to target sites within walking distance of shops and services and public transport for the provision of housing for older people in County Kildare.

3.13 Sustainable Rural Housing

HO O50	Require that all applications demonstrate the ability to provide safe vehicular access to the site where the necessity to remove extensive stretches of native hedgerow and trees or can demonstrate existing hedgerow is not native and provide a landscape design to reinstate a hedgerow to outline proposals for replacement of same or comparative. Note; The need for the removal of extensive roadside hedgerow may indicate that the site is unsuitable for development.
-------------------	--

Kildare PPN recommend to re-word / re-phrase the above objective for to make it more comprehensible and strongly recommend that any requirement to reinstate a hedgerow should in all cases stipulate that only native species of trees or shrubs of native origin and provenance be used.

RESILIENT ECONOMY & JOB CREATION

4.17 Green / Circular Bio-economy

As the Green / Circular economy relates to more than just biological resources (for example, fossil fuel and precious metal products), in the interests of clarity, Kildare PPN suggest rewording the title of this section to *Green / Circular economy and Bio-economy*.

Proposed additional objective:

Further support and encourage green and sustainable practices with new and existing businesses within the County, including how to make their operations more sustainable, through mentoring, clinics and training with the Kildare Local Enterprise Office.

Proposed additional objective:

Investigate the feasibility of establishing a circular economy hub for Kildare based off the business model of the Rediscovery Centre, the National Centre for the Circular Economy, in partnership with relevant stakeholders including the EPA.

4.18 Agri-Food and Beverage Sector

RE 083	Maximise the ability of communities to be self-sufficient in food production, energy savings and production, waste disposal etc
---------------	---

Recommendation:

Develop and outline the specific actions on how Kildare County Council are going to address Objective **RE 083**.

4.24 Peatland Tourism

Recommendation:

Amend all instances of National Peatlands Heritage Park to *National Peatlands Park* throughout the County Development Plan.

SUSTAINABLE MOBILITY & TRANSPORT

5.3 Overarching Goals, Policies and Objectives

Proposed addition:

TM O7	Introduce measures to reduce traffic congestion in town centres such as pedestrianisation, pedestrian priority and/or improved pedestrian/cycling facilities, in particular increasing the number of safe crossings.
------------------	--

TM O8	To investigate the feasibility of locations for car-free residential, town centre and other developments, in appropriate locations near high quality, frequent public transport services, as part of the preparation of the suite of Local Area Plans.
------------------	--

Proposed addition: *To also including trialling locations as part of the above objective.*

5.4 Sustainable Movement

TM O11	<p>Investigate the feasibility of developing high-quality, suitable, safe and sustainable cycling pathways:</p> <ul style="list-style-type: none"> (i) from Leixlip, Maynooth and Naas into Dublin; and (ii) between Naas and Newbridge, (iii) Kildare town to Newbridge and westwards towards Portlaoise as far as the Kildare county boundary, and (iv) Kildare Town to Monasterevin. <p>Proposed Additions:</p> <ul style="list-style-type: none"> (v) <u>Enfield to Edenderry disused railway line.</u> (vi) <u>Along a Kildare section of the Trans-European Transport Network (TEN-T).</u>
-------------------	---

TM T1	As a minimum , reduce the current car-based trips to work from 74% to 50% and the car-based trips to education from 50% to 40% by the end of this Plan period. ¹⁶
------------------	---

Proposed amendment: *As a minimum, reduce the current car-based trips to work **from 74% to 33.3%** and the car-based trips to education **from 50% to 33.3%** by the end of this Plan period.*

5.4.1 Walking and Cycling

Proposed amendments:

TM O16	Ensure regular maintenance <i>including winter maintenance</i> , of walking and cycling routes and ensure that all roads in new developments are designed in accordance with the principles, approaches and standards contained in the Design Manual for Urban Roads and Streets 2019, the National Cycle Manual (NTA, 2011 – or the pending update) and the Draft GDA Cycle Network Plan (NTA, 2021).
TM O19	Investigate the feasibility of dedicating Dedicate a street(s) to pedestrian only activity on certain days of the week or at certain times of the day, in a pilot town in each of the Municipal Districts during the life of this Plan.
TM O32	Promote and encourage Support the use of the Toolkit for School Travel (2019) by teachers, parents and others and promote and encourage, in consultation with the Department of Education, substantial changes in relation to the items that learners are expected to bring to and from school daily to encourage more learners to cycle to school.
TM A7	Investigate the feasibility of providing a footpath connection dedicated shared path from Maynooth to Celbridge.
TM A13	Prepare a Cycle Network Study for each of the key towns in County Kildare consisting of the primary links identified in the NTA's Draft Greater Dublin Area Cycle Network Plan (2021), local links and links to surrounding settlements; include key strategic cycle routes, greenways connecting the major towns , connections between the major towns and surrounding settlements, key strategic cycle routes, greenways and local links , all in accordance with the National Cycle Manual. The study will include draft widths, level of services and identify local targets.
TM A16	Provide new or upgraded dynamic lighting for all footpath and cycle track schemes subject to the consideration of ecology and impacts on wildlife. Appropriate environmental assessments will be required and may result in unlit sections which may include some parts of the county's Greenways.

5.5 Road and Street Network

TM O58	<p>Secure the implementation and maintain corridors free from development to facilitate future roads, cycle facilities and other transport infrastructure improvement identified within this Plan (Tables 5.4 & 5.5) and Local Area Plans. The further progression of the road projects is subject to assessment against the <u>National Investment Framework for Transport in Ireland (NIFTI)</u> 'Principles of Road Development' criteria set out in Section 13.2 of the Draft Transport Strategy for the Greater Dublin Area 2022-2042. Where the road project is an orbital road around a town centre, the development must be accompanied by enhanced public transport, cycling and pedestrian facilities in the relevant centre, as required by Section 13.5 of the Draft Transport Strategy for the Greater Dublin Area 2022-2042.</p>
-------------------	--

5.10 Road and Street Design

Proposed additional objective:

Reduce motorised traffic in town centres where alternative routes exist to promote walking and cycling in the interests of road safety.

5.12 Car Parking

TM O107	<p>Seek to Reduce the level of on-street parking with a view to the reallocation of the roadspace to sustainable modes and to investigate the feasibility of delivering parking on suitable backland sites that would not jeopardise the vitality and vibrancy of the relevant town/village centre.</p>
--------------------	---

INFRASTRUCTURE & ENVIRONMENTAL SERVICES

6.5.1 Water Services

Recommended additional action: *Urgently seek adoption of the Southeastern River Basin Management Plan in cooperation with other relevant Local Authorities and stakeholders to meet the requirements of the EU Water Framework Directive to achieve good ecological status by, at the latest 2027.*

Recommended additional action: *Enforcement and reporting of the Nitrates Regulations within all of Kildare's River catchment areas in line with statutory requirements. <https://www.gov.ie/en/publication/b87ad-nitrates-directive/>*

6.6 Surface Water / Drainage

Recommended additional objective:

Require that established native vegetation should be left in-situ, wherever possible, to intercept, slow down and filter runoff as an integral part of all new development proposals.

Recommended additional action:

It is an action of the council to ensure that the construction of swales, ponds and other SUDS or nature-based solutions will not contribute to further native biodiversity loss, by requiring that plans submitted at design stage are under the direction of a suitably experienced botanist/ecologist. Additionally, the preferred option in employing these techniques is to allow natural recolonization, or at the very minimum, that any plantings arise from locally sourced native material of native provenance and origin.

6.8.1. Waste Management

IN O42	Promote and facilitate communities to become involved in environmental awareness activities and community-based recycling initiatives, which lead to local sustainable waste management practices.
-------------------	--

Proposed amendment: *Promote and facilitate communities to become involved in environmental awareness activities and community-based ~~recycling initiatives~~ reduction initiatives, which lead to local sustainable waste management practices.*

ENERGY & COMMUNICATIONS

7.4 Renewable Energy

EC O6	Encourage developers of proposed large scale renewable energy projects to carry out community consultation (including, but not limited to Sustainable Energy Communities, where established) in accordance with best practice and to commence the consultation at the commencement of project planning.
--------------	---

Proposed amendment:

Make it a requirement of developers of proposed large scale renewable energy projects to carry out community consultation (including, but not limited to Sustainable Energy Communities, where established and the (in accordance with best practice and to commence the consultation at the commencement of project planning.

EC O11	Encourage wind energy developments in suitable locations in an environmentally sustainable manner whilst having regard to Government policy and the County Wind Energy Strategy.
---------------	--

Proposed Amendment:

~~Encourage~~ *Consider* wind energy developments in suitable locations in an environmentally sustainable manner whilst having regard to Government policy, ~~and~~ the County Wind Energy Strategy and the *EU and national target of 30% of land for biodiversity.*

EC O16	Require comprehensive winter and summer bird and wildlife surveys for all proposed wind farms sites, so that impacts on wildlife can be fully assessed and evaluated and so that appropriate mitigation and adaptation measures can be considered, to include for example removal or repositioning of turbines, introducing one black painted rotor blade (to reduce motion smear and reduce incident of collision) or the provision of technologies that help minimize harm to birds and other wildlife.
---------------	---

Proposed Amendment: *Require comprehensive winter and summer bird and wildlife surveys for all proposed wind farms sites, as set out in EIA and other relevant legislation. Post-construction bird surveys should be included as a condition of planning for any consented developments to permit before and after impacts to be assessed. Turbine design and adaptation should use the best available technology to minimise harm to birds and other wildlife.*

7.12.5 Electric Vehicles

Proposed Objective: *Explore the possibility of integrating solar power with EV charging in Kildare County Council owned car parks throughout the County, potentially utilizing the space on the roof tops of public buildings and bus shelters.*

7.12.7 Peatlands

EC P17	Support the preparation of a comprehensive “after use” framework plan for the industrial peatlands and associated workshops, office buildings, industrial sites and power stations in Kildare, acknowledging the significant contribution that these expansive lands make towards the special landscape of the Bog of Allen and <i>Insert its potential to further the growth of tourism to the County.</i>
EC O51	Support Bord na Mona, <i>Insert the local communities and other key stakeholders</i> in the preparation of a long-term strategic plan for the former industrial peatlands.
EC O54	Require an Ecological Impact and <i>Insert Landscape</i> Assessment to be carried out and submitted with any planning application for energy infrastructure projects (e.g., wind and solar developments) on bog / peatlands (including former cut-away bogs).

OUR RURAL ECONOMY

9.1 Background

Proposed addition: *Traditional sectors such as agriculture, extractive industries, and forestry will be important in helping Kildare reach targets in relation to climate change and will play a vital role over the coming years and the period of this plan to help Ireland reach its climate targets particularly in relation to food security carbon storage, provision of renewable energy, reducing emissions, protection of water bodies and increasing biodiversity.*

Proposed amendment:

The agri-food, forestry, and tourism sectors play a significant role in Ireland's rural economy. Kildare is well positioned as a gateway county to the Midland Peatlands and the West from Dublin, to contribute more to the tourism sector, with the development of Greenways, Blueways, Peatways and the potential of a National Peatlands Park on former industrial cutaway bog providing an alternative eco-tourism and activity-based experience.

9.3 Rural Economy & Rural Enterprise

RD O6	Encourage the conservation and promotion of biodiversity in all rural development activities whilst supporting the restoration, preservation, and enhancement of ecosystems dependent on agriculture and forestry.
------------------	--

Suggested additions to reflect the following:

- *Actively enforce the protection and conservation of protected sites (SACs, SPAs, NHAs and pNHAs).*
- *Ensure the identification and protection of existing high nature value habitats in natural and semi-natural areas.*
- *Support the restoration of degraded agricultural and woodland ecosystems, through sound ecological practices.*
- *Any 'enhancements' of ecosystems will seek to protect existing native biodiversity by using locally sourced native planting material of native provenance and origin*

RD O8	Promote the provision of broadband and other communications infrastructure in rural areas of the county through supporting the continued roll out of the National Broadband Scheme insert <i>and initiatives such as the EU Smart Villages Initiative.</i>
--------------	---

9.6 Horticulture

Proposed additional action: *To require that any native plantings planted through Council funded planting schemes be of native provenance and origin by 2024 (and preferably local provenance and origin by 2027).*

Proposed additional action: *To require that any native plantings for green infrastructure or nature-based solution planting schemes be of native provenance and origin by 2024 (and preferably local provenance and origin by 2027).*

Proposed additional action: *To require that any native planting for biodiversity initiatives be of native provenance and origin by 2024 (and preferably local provenance and origin by 2027).*

Proposed additional action: *To ban the use of peat-based horticulture products in Council funded planting schemes by the end of this Development plan.*

9.7 Forestry

RD O20	Encourage public and private owners to allow / provide public access to forests for recreational and amenity use e.g., walking, biking and equine trails to enhance health and wellbeing insert <i>with due consideration to sensitive areas for wildlife conservation and subject to compliance with the relevant environmental legislation.</i>
---------------	--

RD O22	Facilitate tourism infrastructure and visitor services including tourism accommodation at appropriate locations in forest estates. insert <i>with due consideration to sensitive areas for wildlife conservation and subject to compliance with the relevant environmental legislation.</i>
---------------	--

Proposed additional action: *To require that any native tree plantings planted through Council funded Woodland planting schemes be of native provenance and origin by 2024 (and preferably local provenance and origin by 2027).*

9.8 Bogs and Peatlands

We suggest insertion of the following paragraph:

The National Peatlands Park and development of the Blueway demonstrates great potential to tangibly assist a Just Transition for local communities, leading to successful economic regeneration and a sustainable local economy.

Kildare County Council (together with Failte Ireland and other relevant stakeholders) will actively support community-led tourism initiatives encompassing the Blueway and peatland areas to the west as part of a National Peatlands Park. This has the unique potential to offer the visitor a relaxed “wilderness” environment.

Kildare County Council recognises that the development of a range of outdoor activities based around our natural amenities of bogs, canals and rivers and the discovery of the area’s natural and built heritage could significantly support the future growth of tourism in Kildare and the midlands.

Suggested amendments:

RD P7 - *Support the appropriate and sensitive diversification of former cutaway and degraded peatlands, whilst ensuring the protection of their ecological, archaeological, cultural, and educational significance in line with the National Peatlands Strategy (DAHG 2015) and the Peatlands & Climate Change Action Plan 2030.*

Additional Policy: *Conserve and protect, where possible, all intact peatlands (bogs and fens), and encourage ecologically informed restoration where appropriate on damaged peatlands.*

Additional Policy - *To support sustainable tourism and infrastructure for peatland communities.*

COMMUNITY INFRASTRUCTURE AND CREATIVE PLACES

10.1 Background

Kildare PPN suggest inserting the following in the introduction:

The provision of adequate and suitably located community, leisure and cultural facilities are critical infrastructure to support our towns and villages. These services significantly enhance the quality of life of the citizens of Kildare and enhances the attractiveness of Kildare as a place to visit. While Kildare has a wide range of community services and facilities, the county's young and growing population is placing considerable pressure on these services in many areas. The Kildare Age Friendly Strategy 2019-2021 reports that the ageing of the population from this point onwards will represent one of the most significant demographic and societal developments and challenges that Ireland has encountered. It is anticipated that by 2031, 16% of the population of County Kildare will be over the age of 65 years, with this rate increasing to 21% by 2040. Therefore, the aging population of Kildare presents an additional pressure on these services in many areas.

10.5 Kildare LCDC & Kildare LECP 2016-2021

SC O4	Support and promote volunteerism through participation in the Public Participation Network (PPN) structure by supporting the work of the Kildare Volunteer Centre.
------------------	--

As Kildare PPN and the Kildare Volunteer Centre are two separate independent structures, we propose the following:

Support, promote and encourage community engagement in local decision making through the Kildare Public Participation Network Structure and promote volunteerism by supporting the work of the Kildare Volunteer Centre.

10.6 Community Services and Facilities

SC O6	Support and encourage the clustering of community facilities such as community centres, sports and leisure facilities, schools, childcare facilities, insert resources for the elderly and open spaces to create multi-purpose community hubs.
------------------	---

Proposed additional objective: *Support and encourage community involvement in the rehabilitation and restoration of Bord na Mona peatlands and in the planning for the **National Peatlands Park**, which has the potential to become an important recreational and educational amenity in the County.*

Proposed additional action: *To compile an up-to-date, publicly accessible Property Interest Register during the course of this Development plan to inform and facilitate community-led social initiatives on suitable state-owned sites.*

Proposed additional action: *Actively target and engage with owners of Vacant and Derelict sites to incentivise the provision of social infrastructure during the preparation of Local Area Plans.*

Proposed additional action: *Actively support the establishment of a National Peatlands Park and the implementation of the objectives identified in the West Kildare Just Transition Plan 2022 by bringing all relevant stakeholders together to progress same before the end of 2023.*

10.8.1 Children and Young People

SC A5	Carry out an audit of leisure facilities across the County including Kildare County Council facilities to provide standards on the basic level of social infrastructure provision based on population thresholds and reasonable travel times to services and put in place provisions for additional facilities where deficiencies are identified. Insert <i>To be fully completed by the end of this plan.</i>
------------------	--

Proposed additional action - *To compile an up-to-date, publicly accessible Property Interest Register during the course of this Development plan to inform and facilitate community-led initiatives for children and young people on suitable state-owned sites.*

Proposed additional action - *Actively target and engage with owners of Vacant Sites to incentivise the provision of centrally located youth cafes.*

10.8.2 People with Disabilities

SC A9	Conduct an accessibility audit throughout the county to include access to public buildings, parks, amenity areas, playgrounds, heritage/tourist sites and graveyards in conjunction with the KCC Parks and Access Officer.
SC A10	Develop and maintain a directory of universally accessible recreational areas, sports and play facilities, community facilities and tourist attractions, throughout the county insert and develop additional facilities, where there is an identified need, in conjunction with the KCC Access Officer.

Proposed addition to SCA10: *Publish said accessibility directory online, through the medium of an interactive map, ensuring it's accessible for all users.*

10.11 Library Services

Proposed additional objective:

Kildare PPN recognise the valuable services that the Kildare library service provides to people in Kildare and propose an additional objective is added to the CDP is to further expand the library service to establish a 'Library of Things', where members of the public can borrow items that may only be needed occasionally e.g. carpet cleaner, sewing machine, gazebo.

10.16 Places of Worship/Burial Grounds

SC A22	To undertake an audit of all burial facilities within the county insert <i>within the lifetime of this plan</i> in order to: <ul style="list-style-type: none"> (i) Determine the available remaining capacity of all burial facilities. (ii) Identify where extensions to existing burial facilities could be accommodated where facilities are at or close to capacity, having regard to any site restrictions. (iii) Actively pursue lands to accommodate additional burial facilities whether by way of extension or new sites, subject to appropriate environmental assessments and considerations., and
---------------	---

BIODIVERSITY & GREEN INFRASTRUCTURE

Aim: *To contribute towards the protection, conservation and management of the County's unique biodiversity including sites designated at national and EU level, protected species and habitats outside of designated sites and to promote the development of an integrated Green Infrastructure network in order to improve our resilience to climate change and to enable the role of Green Infrastructure in delivering sustainable communities.*

Proposed amended aim:

Employ transformational change to ensure the protection, conservation and management of the County's unique biodiversity, including sites designated at national and EU level, protected species and habitats outside of designated sites and to promote the development of an integrated, ecologically guided, Green Infrastructure network, in order to improve our resilience to climate change and to enable the role of Green Infrastructure in delivering sustainable communities.

12.1 Biodiversity

Proposed amendment to definition: *The variability among living organisms from all sources including, inter alia, terrestrial, marine and other aquatic ecosystems and the ecological complexes of which they are part; this includes diversity within species, between species and of ecosystems* CBD (2006).

It should be clearly pointed out here that Biodiversity conservation operates at 3 levels (genetic, species and ecosystem (habitat) level).

Therefore, we must seek to protect:

- the genetic integrity of our island adapted populations.
- all our species, including the legally protected rare and threatened ones.
- functioning habitats which can support these species, along with the species we have not yet identified (of which there are many).

12.3.1. EU Habitats Directive

It is noted that none of Kildare's Natura 2000 sites currently have management plans in place. This should be clearly stated in Kildare's County Development Plan (United Nations Economic

Commission for Europe 1998) and Kildare PPN propose that Kildare County Council urgently engage with NPWS to expedite the formulation and implementation of these management plans for the EU protected sites in Kildare. For example: see Pollardstown Fen: <https://www.npws.ie/sites/default/files/protected-sites/natura2000/NF000396.pdf>

12.4 International Policy Context

12.4.1 EU Biodiversity Strategy for 2030

Based on the Eu Biodiversity Strategy Statement (European Commission 2020) Kildare PPN suggest the addition of the following:

On 20 May 2020, the Commission adopted an EU Biodiversity Strategy for 2030 (European Commission, 2020). The strategy presents an ambitious agenda to arrest the trend in biodiversity loss with increasing emphasis on ecosystem restoration and transformative change.

The strategy contains specific commitments and actions to be delivered by 2030:

- *Better respecting nature in public and business decision-making*
- *Ensuring better implementation and tracking of progress*
- *Improving knowledge, financing and investments*
- *Establishing a larger EU-wide network of protected areas on land and at sea (30%);*
- *Launching an EU nature restoration plan;*
- *Introducing measures to enable the necessary transformative change;*
- *Introducing measures to tackle the global biodiversity challenge.*

12.5.3 County Kildare Biodiversity Action Plan 2009-2014

Kildare PPN propose the following amendments:

The County Biodiversity Plan provides a framework for conserving biodiversity and natural heritage at a local level. It complements the Kildare Heritage Plan by including detailed actions to deliver positive outcomes focused on species and habitats. A key focus of the plan is gathering information on high nature value habitats and threatened species by engaging with local and national experts; and managing the biodiversity resource, education, awareness raising and the promotion of effective cooperation between stakeholders. ~~The County Kildare Biodiversity Plan will be reviewed during the lifetime of this plan.~~ The County Kildare Biodiversity Action Plan will be reviewed and detailed time-bound actions be published by the end of 2023.

POLICY

Kildare PPN suggest the following slight amendment:

BI P1	Integrate in the development management process the protection and enhancement of biodiversity and landscape features wherever possible, by minimising adverse impacts on existing habitats (whether designated or not) and by including <i>ecologically guided</i> mitigation and/or compensation measures, as appropriate.
--------------	--

Objectives

BI O1	Require, as part of the Development Management Process, the preparation of Ecological Impact Assessments that adequately assess the biodiversity resource within proposed development sites, to avoid habitat loss and fragmentation and to integrate this biodiversity resource into the design and layout of new development and to increase biodiversity within the proposed development.
-------	--

Kildare PPN proposed that the specific stakeholders assigned with responsibility for the above are listed and possess the ecological expertise to enable them to assess the Ecological Impact Assessments.

Proposed Amendments:

BI O2	Encourage and promote <i>Require, wherever possible,</i> Encourage and promote the retention and creation of green corridors within and between built up urban areas and industrial scale developments to protect wildlife habitat value including areas that are not subject to public access.
--------------	--

BI O4	Promote increased public participation in biodiversity conservation by supporting and encouraging community-led initiatives such as native tree planting (<i>of native provenance and origin</i>), the removal of invasive species and the continued preparation of Local Biodiversity Actions Plans, <i>guided by appropriate local and national expertise</i> , for settlements in County Kildare.
-------	--

BI A2	Carry out habitat mapping on a phased basis and integrate biodiversity considerations and protection measures into the suite of mandatory Local Area Plans and to develop specific policies and objectives that could be incorporated into council programmes and activities.
--------------	---

Proposed amendment to BI A2:

Carry out habitat mapping on a phased basis which will incorporate the knowledge of local and national experts. County Kildare will be broken in XX (please insert) units for this purpose and all units will be completed during the lifetime of this plan. Kildare County Council commits to integrating biodiversity considerations and protection measures of high nature value habitats identified by these reports into the suite of mandatory Local Area Plans, and to further develop specific policies and objectives that could be incorporated into council programmes and activities.

12.6 Designated sites for nature conservation

12.6.1 Natura 2000 network

Proposed amendments:

BI P2	<i>Actively engage with local and national expertise (including NPWS) to assess the current conservation status, and restore, protect and maintain</i> Protect and maintain the favourable conservation status and conservation value of all-natural heritage sites designated or proposed for designation in accordance with European and national legislation and agreements. These include Special Areas of Conservation (SACs), Special Protection Areas (SPAs), Natural Heritage Areas (NHAs), Ramsar Sites and
BI O6	Ensure an Appropriate Assessment, in accordance with Article 6(3) and Article 6(4) of the Habitats Directive and with DEHLG guidance (2009), is carried out in respect of any plan or project not directly connected with or necessary to the management of a Natura 2000 site to determine the likelihood of the plan or project having a significant effect on a Natura 2000 site, either individually or in combination with other plans or projects and to ensure that projects which may give rise to significant cumulative, direct, indirect or secondary impacts on Natura 2000 sites will not be permitted (either individually or in combination with other plans or projects) unless for reasons of overriding public interest. <i>Given the Council's acknowledgement of the Biodiversity Crisis in 2019, and the most recent Article 17 reporting on EU protected habitats and species, the Council commits to additional funding to appoint a suitably qualified staff member to evaluate Appropriate Assessments contributed as part of development proposals.</i>
BI O7	<i>Urgently advocate for and support</i> the establishment of conservation measures and the preparation and implementation of management plans for the conservation of Natura 2000 sites by NPWS, as required by Article 6(1) of the Habitats Directive.

Please note: BI P2 and BI P3 repeat the same Policy Statement

12.6.2 Natural Heritage Areas (NHAs) and Nature Reserves

BI O8	Require the preparation of an Ecological Impact Assessment (EclA) by a suitably qualified professional for proposals for development within or adjacent to a Natural Heritage Area (NHA) to ensure the development is designed and sited to minimise its impact on the biodiversity, ecological, geological and landscape value of the site, particularly plant and animal species listed under the Wildlife Acts.
--------------	--

Kildare PPN propose that Kildare County Council appoint a suitably qualified staff member to evaluate Ecological Impact Assessments (EclAs) contributed as part of development proposals.

12.7 Protected Habitats and species outside Designated Areas

12.7.1 Protected Habitats and Species

Proposed addition:

BI P4	Ensure that any new development proposal does not have a significant adverse impact, incapable of satisfactory mitigation on plant, animal or bird species which are protected by law. <i>To inform the planning process, Kildare County Council commits to completing a database of rare habitats and site lists for rare flora and other relevant rare species protected by law over the course of this Development plan.</i>
--------------	---

Proposed addition:

BI A6	<i>To engage with local and national expertise (including NPWS) to</i> Undertake surveys and collect data to provide an evidence-base to assist the Council in meeting its obligations under Article 6 of the Habitats Directives (92/43/EEC) as transposed into Irish Law, subject to available resources. <i>A plan will be formulated before the end of 2022 to provide for the setting aside of resources in a staged manner to ensure that this is completed over the course of the Development Plan.</i>
--------------	--

12.8 County Biodiversity Sites

Proposed addition:

BI A7	Identify and map, <i>and make publicly available</i> County Biodiversity Sites in cooperation with the relevant statutory agencies, other relevant groups and the general public, not otherwise protected by legislation.
--------------	---

Proposed addition:

BI A10	Work with Teagasc and landowners throughout the county in order to identify suitable 'Hare's Corner' projects which would create pocket sized habitats in order to enhance biodiversity. <i>Any such projects will seek to protect existing biodiversity by ensuring that any planting 'enhancements' are from locally sourced native material of native provenance and origin.</i>
---------------	---

Proposed additional action: *Publish updated list of County Biodiversity Sites in the County Biodiversity Action Plan*

12.9 Trees, Woodlands and Hedgerows**12.9.1 Hedgerows****Proposed additions:**

A survey of Kildare hedgerows was conducted in 2006 (Foulkes, 2006) where the total length of hedgerow in County Kildare was estimated at 10,305km. The average figure for hedgerow density as 5.92 km/km². It is estimated that 1.2% of the county was covered in hedgerows in 2006. County Kildare's hedgerows show a higher degree of fragmentation than those of other counties, largely due to the high degree of development in rural areas. This coupled with the fact that two thirds of hedges adjoin intensively managed farmland, means that there are implications for the overall biodiversity potential of the resource. *Since the publication of Foulkes, 16 years ago, Kildare's hedgerows have further deteriorated due to removal for development, over-management and under-management.*

Proposed additions:

BI A16	Develop a pilot project to demonstrate traditional hedgerow management skills including hedge laying. <i>Engage with developers to encourage traditional hedgerow management to rejuvenate boundary hedges, where appropriate and feasible.</i>
---------------	---

12.10 Inland Waters: Lakes, Rivers, Streams and Groundwater**Proposed additions:**

BI O29	Ensure the protection, improvement or restoration of riverine floodplains and to promote strategic measures to accommodate flooding at appropriate locations including nature-based solutions, in order to protect ground and surface water quality and build resilience to climate change. <i>Kildare County Council commits to ensuring that the construction SUDS or other nature-based solutions will not contribute to further native biodiversity loss, by requiring that plans submitted at design stage are under the direction of a suitably experienced botanist/ecologist. Additionally, the preferred option in employing these techniques is to allow natural recolonization, or at the very minimum, that any plantings arise from locally sourced native material <u>of native provenance and origin</u>.</i>
---------------	--

12.11 Wetlands and Ramsar Sites

Proposed amendments:

BI P8	Ensure that Kildare's wetlands and watercourses are retained for their biodiversity and flood protection values and maintain good ecological status of wetlands and watercourses in support of the provisions of the Water Framework Directive and Ramsar Convention. <u>at a minimum to achieve and maintain at least good ecological status for all wetlands and watercourses in the county by, at the latest, 2027 in line with the Water Framework Directive and Ramsar Convention.</u>
--------------	--

Proposed amendments:

BI O31	Protect wetland sites that have been rated A (International), B (National) C+ (County) and C (Local) importance <i>and D (Moderate value, locally important)</i> as identified in the County Kildare Wetlands Survey 2012-2014, (See Tables 12.5 &
---------------	--

12.12 Invasive Species and Noxious Weeds

Please note: any kind of a living organism that is not native to an ecosystem may become invasive and pose a major threat, for example:

- Ash dieback (caused by a fungal organism).
- Grey Squirrels, Ferrel Ferrets and Muntjac Deer (all mammals)

Also please note that fungi and other microorganisms currently pose a significant threat to forests and trees in Ireland for example, a number of Phytophthora species (Teagasc) (O'Hanlon et. al. 2021).

Proposed additions:

BI P9	Implement and Support measures for the prevention and/or eradication of invasive species within the county and the control of noxious weeds.
-------	---

Proposed additions:

BI A17	Prepare a programme of mapping of invasive species in the county <i>including the development of a web portal to allow residents of County Kildare to report invasive species in the County, by the end of 2023.</i>
--------	--

Proposed additional actions:

- *It is an action of the Council to determine, as a priority, whether there is a potential threat of invasive species to the protected sites within the County, and to begin a dedicated programme of eradication, beginning with the Natura 2000 sites.*
- *It is an action of the Council to begin a dedicated campaign to build awareness of invasive species amongst all residents of the county. Additionally, this programme will provide training to Community Groups on appropriate control and removal measures for responsive species, and will educate and facilitate training on reporting of plant species necessitating herbicide treatment for their removal.*

12.14 Green Infrastructure (GI)

12.14.3 Green infrastructure general

Proposed amendment to Green Infrastructure definition: *Green infrastructure is a strategically planned network of natural and semi-natural areas with other environmental features designed and managed to deliver a wide range of ecosystem services such as water purification, air quality, space for recreation and climate mitigation and adaptation. This network of green (land) and blue (water) spaces can improve environmental conditions and therefore citizens' health and quality of life. It also supports a green economy, creates job opportunities and enhances biodiversity* European Commission (2015)

Proposed additional statement:

Identify the key elements of the green infrastructure network in Kildare; designate these as important elements of the County's green infrastructure network; protect the key elements of the green infrastructure network and seek to enhance and expand the County's green infrastructure network, through informed, evidence-based methods, which do not threaten the integrity of existing native biodiversity.

Proposed addition:

BI A19	<i>Identify, map,</i> Protect and maintain a Green Infrastructure network in the county.
---------------	--

12.14.4 Green Infrastructure approach to spatial planning**Proposed addition:**

BI P12	Recognise the importance of Green Infrastructure in Kildare and protect this valued biological resource, the ecosystem services it provides and the contribution to climate resilience. <i>Kildare County Council will ensure, as far as is possible, that any future development zonings are carefully considered and managed so they do not negatively impact the integrity and proper functioning of the existing Green Infrastructure network.</i>
---------------	--

12.14.9 Urban Green Infrastructure**Proposed amendments:**

BI P13	Recognise the importance of Urban Green Infrastructure in addressing a broad range of urban challenges, such as conserving biodiversity <i>connecting people with nature</i> , adapting to climate change, supporting the green economy and improving social cohesion and to seek to protect and enhance this resource, <i>particularly existing semi-natural areas or habitats (such as hedgerows, canals, rivers).</i>
---------------	---

BI O45	Ensure that the Green Infrastructure Strategy and Network identified in this County Development Plan and Local Area Plans is used to inform the development management process to ensure that new residential areas, business/ industrial development <i>tourism</i> and other relevant projects contribute towards the <u><i>conservation and protection of Kildare's habitats and species, and</i></u> protection, management and enhancement of the existing Green Infrastructure in terms of
---------------	--

BI O46	Identify existing Green Infrastructure at the initial stages of the planning process and to use this information to guide the overall design of an appropriate site layout which is reflected in the developments landscaping plan. The landscaping plan submitted with an application should clearly illustrate how existing Green Infrastructure <u><i>(particularly semi-natural or high nature value elements) are to be retained, and provide</i></u> opportunities to create more linkages, have informed and been incorporated into the development, layout and, if appropriate, management proposals. <u><i>These plans will be reviewed by a suitably qualified ecologist (accessing local and national expertise)</i></u>
---------------	---

Proposed amendment:

BI O47	Ensure that the design of new development does not cause fragmentation of the Green Infrastructure network <i>(particularly existing semi-natural or high nature value areas)</i> .
---------------	---

12.14.10 Green Infrastructure within Public Open Spaces and Parks**Proposed addition:**

BI P14	Protect and enhance the Green Infrastructure network throughout the county <i>having regard to ecologically sound techniques, such as managed rewilding, and utilising plants of local provenance and origin.</i>
---------------	---

12.14.11 Green Infrastructure and Sustainable Urban Drainage Systems**Policy****Proposed additional Policy Statement:**

Require that established native vegetation should be left in-situ, wherever possible, to intercept, slow down and filter runoff as an integral part of all new development proposals.

Proposed additions:

BI O51	Promote and support the development of Sustainable Urban Drainage Systems (SuDS) such as integrated constructed wetlands, permeable surfaces, filter strips, ponds, swales and basins at a site, district and county level and to maximise the amenity and bio-diversity value of these systems <i>The first step in this approach will be that existing established native vegetation should be left in-situ, wherever possible. Where additional measures are necessary, the preferred option in employing these techniques will be to allow natural recolonization, or at the very minimum, that any plantings arise from locally sourced native material of native provenance and origin.</i>
BI O52	Integrate nature-based solutions and climate change considerations into the design, planning, and implementation of infrastructure provision/ works and development proposals at the earliest possible stage of the design process, <i>ensuring that these solutions do not undermine or pose threats to Kildare's native biodiversity by primarily employing techniques to allow natural recolonization, or at the very minimum, that any plantings arise from locally sourced native material of native provenance and origin.</i>

LANDSCAPE RECREATION AND AMENITY

LR O37	Promote and enhance public access for all to the upland areas, rivers, lakes and other natural amenities of County Kildare, in conjunction with the relevant landowners and agencies, while protecting environmental sensitivities and ecological corridors.
---------------	--

Proposed additional action:

Collaborate with Waterways Ireland and other relevant stakeholders to ensure recreation, amenity and heritage sites in Kildare are accessible to all e.g. the removal of Kissing Gates along the canals as these are in-accessible for wheelchair users.

13.7.2 Allotments, Community Gardens and Farms

LR A23	Investigate the feasibility of an Allotment Pilot Programme to consider matters relating to site identification, administration, leases/rental and resources required to deliver an allotment in each Municipal District in association with District Engineers and the Parks Department.
---------------	---

Proposed objective: *Increase the amount of Kildare County Council community gardens/allotments by 40% throughout the duration of the Plan.*

Proposed Action: *Support and facilitate the development of allotments and community gardens, by actively identifying suitable sites throughout Kildare.*

MONITORING AND EVALUATION

16.2.1 Provisions of the County Development Plan

The objectives of the Plan are measured and targeted in nature and have been designed, as far as practical, to be SMART (Specific, Measurable, Assignable, Realistic and Time-Related). Many of the most important objectives are supported by specific actions and in some cases explicit targets where there has been a clear direction for same having regard to recent national publications in particular (e.g., transport and climate change). It is intended that these actions and targets will provide further assistance in providing measurable indicators when evaluating aspects relating to the overall effectiveness and delivery of the Plan throughout its six-year life cycle. (Draft County Development Plan)

Throughout the Plan a significant number of actions are not assigned specific measurable targets or timelines. Kildare PPN propose that key timelines are attributed to each of the actions contained in the plan, or at the very least assign a timeframe for each action as Short, Medium or Long and include a key outlining the approximate duration corresponding to short, medium or long timeframes.

16.2.2 Monitoring and Reporting on the Development Plan

Kildare PPN propose that a yearly progress report on the County Development Plan is compiled and published on the Kildare County Council website. While we recognise that an extensive amount of time and resources goes into preparing such a report, we feel it is necessary to keep members of the public in Kildare full informed on the development of their county.

Kildare PPN also propose that the Sustainable Development Goals are integrated within the actions of the plan in particular when monitoring and reporting of progress of the County Development Plan.

REFERENCES

1. CBD (2006). Convention on Biological Diversity. *Article 2 Use of Terms*. Available at: [https://www.cbd.int/convention/articles/?a=cbd-02#:~:text=%22Biological%20diversity%22%20means%20the%20variability,between%20species%20and%20of%20ecosystems."\)](https://www.cbd.int/convention/articles/?a=cbd-02#:~:text=%22Biological%20diversity%22%20means%20the%20variability,between%20species%20and%20of%20ecosystems.) Accessed: 22nd May 2022
2. Census 2022: Dissemination Strategy https://www.cso.ie/en/media/csoie/census/census2022/0083201_Census_Disemmination_Strategy_2022.pdf
3. Department of Environment, Climate and Communications (2019). Climate and Communications Climate Action Plan.
4. Department of Housing, Local Government and Heritage (2020). Sustainable Rural Housing Development Guidelines
5. Department of Transport (2021). National Investment Framework for Transport in Ireland (NIFTI).
6. DERELICT SITES ACT 1990, Updated to 29 March 2020
7. European Commission (2015). The forms and functions of green infrastructure. Available at: https://ec.europa.eu/environment/nature/ecosystems/benefits/index_en.htm Accessed: 23rd May 2022.
8. European Commission (2020). Biodiversity Strategy for 2030.
9. O'Hanlon R, Ryan C, Choiseul J, Murchie A K, Williams C D., (2021). Catalogue of pests and pathogens of trees on the island of Ireland. *Biology and Environment: Proceedings of the Royal Irish Academy. 121 B (1)*.
10. Oireachtas (2015). Urban Regeneration and Housing Act 2015
11. Teagasc. Phytophthora ramorum. Available at: <https://www.teagasc.ie/crops/forestry/advice/forest-protection/phytophthora-ramorum/> Accessed: 21th May 2022
12. The European Parliament and The Council of the European Union (2000). EU Water Framework Directive.

13. United Nations Economic Commission for Europe (1998). Convention on Access to Information, Public Participation in Decision-making, and access to Justice in Environmental Matters.