



## Draft Maynooth and Environs Joint Local Area Plan 2025-2031

The Eastern and Midland Regional Assembly notes the publication of the draft Maynooth and Environs Joint Local Area Plan (JLAP) 2025-2031 and sets out hereunder submissions and observations on behalf of the Assembly. This submission has been prepared by the executive and approved by the Cathaoirleach of the Eastern and Midland Regional Assembly.

### 1.0 Legislative Context

The role and function of the Regional Assembly, including the scope of the RSES, is currently provided for in the Planning and Development Act 2000 (as amended). It should be noted that this legislation is currently under review, with the new Planning and Development Bill 2023 approved by Cabinet on 3<sup>rd</sup> October 2023 and published by the Department of Housing, Local Government and Heritage on 21<sup>st</sup> November 2023, with a revised draft of the Bill, as passed by Dáil Éireann, published in June 2024.

The Regional Assembly is not required under Section 27 of the Planning and Development Act 2000 (as amended), to prepare a submission and observation on a local area plan prepared by a local authority as is the case for a development plan, or variation thereof, however the Regional Assembly considers that regionally important and strategic plans should be commented upon by the Assembly, and in this case a plan for a designated Key Town in the Region is considered as such. In this regard the Assembly makes this submission and the comments hereunder to be taken into consideration by the local authority in the making of the Maynooth and Environs Joint Local Area Plan 2025-2031.

### 2.0 Regional Spatial and Economic Strategy (RSES)

The RSES for the Eastern and Midland Region, which was made by the Members of the Assembly on 28<sup>th</sup> June 2019, is a strategic plan and investment framework to shape future growth throughout the Region. In line with the provisions of the Planning and Development Act 2000, as amended, the Planning Authority shall ensure that a local area plan is consistent with the objectives of the development plan, its core strategy, and the Regional and Spatial Economic Strategy of the Eastern and Midland Region, thus ensuring full alignment between local, regional and national planning policy.

Maynooth is identified as a Key Town in the RSES growth strategy, being located in the Dublin Metropolitan area on the North-West Corridor, and is included in the Dublin Metropolitan Area Strategic Plan (MASP). The RSES outlines that Metropolitan Key Towns are large economically active service towns located within the Dublin Metropolitan Area, with high quality transport links and capacity for increased residential and employment densities at strategic transport nodes. The Key Metropolitan Town of Maynooth, along with Swords and Bray, are important in a regional and in a county context and they have the capacity and future growth potential to accommodate above

average growth in the Region with the requisite investment in employment creation, services, amenities and sustainable transport.

### **3.0 Submission**

At the outset, the Assembly would like to acknowledge the extensive work that both Kildare and Meath County Councils have carried out in order to prepare the draft Maynooth and Environs Joint Local Area Plan and, in particular, the overall approach and effort of the Councils to coordinate and incorporate policies and objectives so that they are consistent with the RSES is welcomed.

The draft JLAP outlines the strategic policy framework that highlights how the plan will be informed by a hierarchy of planning guidance, including the National Planning Framework (NPF), the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region and the Kildare and Meath County Development Plans. The structure and content of the draft JLAP constitutes the following headings:

1. Introduction and Context
2. Spatial Planning Context and Vision
3. Compliance with the Core Strategies
4. Delivering Place Quality in a Low Carbon Town
5. Home and Communities
6. Economic Development
7. Movement and Active Travel
8. Built Heritage and Archaeology
9. Green and Blue Infrastructure
10. Infrastructure and Environmental Services
11. Implementation

The Assembly considers that these areas of focus satisfactorily align with the three key principles of the RSES (Healthy Placemaking, Climate Action and Economic Opportunity) and the sixteen Regional Strategic Outcomes (RSOs), which are outlined in Section 2.3 of the RSES.

### **3.1 Introduction and Context**

Section 1 of the draft JLAP provides an introduction to the plan preparation process indicating that the proposed new plan will act as the key statutory planning document which sets out an overarching strategy to guide and manage the proper planning and sustainable development of Maynooth and Environs over the lifetime of the plan. The plan will integrate both 'top-down' and 'bottom-up' development priorities for the town.

The draft JLAP for Maynooth and Environs has been prepared by Kildare and Meath County Councils to adhere to Regional Policy Objective (RPO) 4.35 of the RSES to provide for a co-ordinated planning framework for the Maynooth area. The RPO states that the Joint LAP shall:

- Provide a boundary for the plan area
- Identify strategic housing and employment development areas and infrastructure investment requirements; and
- Promote greater co-ordination and sequential delivery of serviced lands for development.

The draft JLAP is also informed by a number of data-based documents including;

- Strategic Environmental Assessment (SEA)
- Habitats Directive Assessment (Appropriate Assessment)
- Strategic Flood Risk Assessment (SFRA)
- Surface Water Management Strategy (SWMS)
- Maynooth and Environs Area Based Transport Assessment (MEABTA)
- Settlement Audit Capacity (SCA)
- Social Infrastructure Audit (SIA)
- Maynooth and Environs Habitat Mapping Report
- Maynooth Architectural Conservation Area (ACA) Statement of Character

The Assembly considers the overall plan preparation to be comprehensive, with the structure and content being in accordance with Local Area Plan Guidelines for Planning Authorities 2013 and the Development Plans Guidelines for Planning Authorities 2022 (where relevant).

### **3.2 Spatial Planning Context and Vision**

Section 2 of the draft JLAP outlines the Spatial Planning Context for the plan including where the Joint LAP sits in the hierarchy of Spatial Plans. In Section 2.1.1 the National Planning Framework (NPF) and National Development Plan 2021-2030 (forming Project Ireland 2040) are recognised as the Government's long term policy platform to guide and manage the future growth and development of the country. The NPF includes a series of National Policy Objectives (NPOs) with the ones most relevant to the draft JLAP relating to the promotion of compact growth; the creation of attractive, liveable, well designed and integrated urban places; along with supporting the development of the circular and bio economy.

Section 2.1.2 of the draft JLAP comments on the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region 2019-2031. The three key principles of the RSES are outlined as being Healthy Placemaking, Climate Action and Economic Opportunity. The designation of Maynooth as a Key Town within the Dublin Metropolitan Area is recognised. Table 2.1 of the draft JLAP provides a summary of the Regional Policy Objectives (RPOs) contained in the RSES as they relate to Maynooth.

In addition to the above, Section 2.1.2.1 of the draft JLAP provides commentary on Maynooth being included within the Dublin Metropolitan Area Strategic Plan (MASP). The MASP has identified several residential and employment corridors within the Dublin Metropolitan Area of which Maynooth is located on the North-West Corridor. The draft JLAP recognises that the aim of such corridors is to focus the development of sustainable compact communities along high-quality public transport routes, providing people with increased housing choice in addition to improved access to services, amenities and economic opportunities. The draft JLAP therefore recognises that the future development of Maynooth is not just important at a county level but also at a regional scale, in supporting the growth of Dublin city.

Table 2.2 of the draft JLAP identifies specific provisions relating to the spatial location of future development in Maynooth as provided for in the RSES. This table includes the following;

<b>Regeneration</b>	Maynooth Town Centre, Canal Harbour and Carton Park
<b>Economic Development</b>	West of University Campus (Research and Technology) and at Moygaddy, Co. Meath (Science and Technology)
<b>Residential Development</b>	Significant residential capacity on the Railpark lands, Greenfield and to the north, west and southwest of the town near the University
<b>Phasing/Enabling Infrastructure</b>	DART expansion, road upgrades, bridge, Maynooth Outer Orbital Route (MOOR), wastewater and local water network upgrades.

Section 2.1.3 of the draft JLAP confirms that the Kildare County Development Plan 2023-2029 and the Meath County Development Plan 2021-2027 (as varied) contain a range of policies and objectives that are relevant directly and indirectly to the growth of Maynooth and Environs.

Section 2.3 of the draft JLAP sets out the joint vision for Maynooth and Environs including the vision statement;

*“To plan for Maynooth and Environs to be the best place to grow up, live, learn, work, play and grow old, by harnessing the area’s unique assets and strategic regional location, to facilitate connected and vibrant neighbourhoods where communities can flourish, through leadership and co-ordination, in transitioning to a low carbon and climate resilient future”.*

The draft JLAP states that the vision will be achieved through the establishment of a development framework to provide for the long-term growth of Maynooth beyond the lifetime of the JLAP in order to “future proof” the town and fully capitalise on major public investments including DART+ West and a new train station proposed in the western area of the town. In addition, the plan aims to grow Maynooth in a sequential, compact and phased manner with specific emphasis placed on implementing the ‘10 minute settlement’ principle.

Section 2.3.1 of the draft JLAP outlines that the vision statement above will be integrated into the plan by way of a number of strategic development principles which are been developed as a response to a

comprehensive baseline social-economic and spatial analysis of the town. The draft JLAP states that principles also have regard to, and are inspired by, the Guiding Principles set out in the Dublin Metropolitan Area Strategic Plan (MASP) in Chapter 5 of the RSES.

The six strategic development principles are namely;

- 1) Securing a Sustainable and Compact Settlement
- 2) Creating the Right Jobs in the Right Places
- 3) Realising Sustainable Movement
- 4) Delivering Social Infrastructure
- 5) Making Room for Nature
- 6) Identifying Future Growth Areas.

The Assembly welcomes the overall context set out for Maynooth and Environs in Section 2 of the draft JLAP, including the specific listing of each of the Regional Policy Objectives (RPOs) applicable to Maynooth and the proposed plan response to each RPO. The Assembly considers that the content of this section aligns with the narrative for Maynooth as set out in Section 4 of the RSES and also Section 5 of the RSES (Dublin MASP). The Assembly also welcomes the strategic vision statement for the draft JLAP and considers the overall vision framework for Maynooth and Environs to be clear and concise, and includes alignment with the three key principles of the RSES that comprises Healthy Placemaking, Climate Action and Economic Opportunity.

### 3.3 Compliance with the Core Strategies

Section 3 of the draft JLAP sets out how the plan will comply with the requirements for Maynooth and Environs in the core strategies of the Kildare County Development Plan (CDP) 2023-2029 and the Meath County Development Plan 2021-2027 (as varied) with the housing allocations contained therein previously assessed by the Regional Assembly as being compliant with the RSES 2019-2031 subject to addressing recommendations and observations made by the Assembly during the development plan preparation stage.

Section 3.2.1 of the draft JLAP acknowledges that under the provisions of NPO 68 of the National Planning Framework, a Metropolitan Area Strategic Plan (MASP) may enable up to 20% of the phased population growth targeted in the principal city and suburban area to be transferred to the wider metropolitan area. In July 2020, the Eastern and Midland Regional Assembly, in consultation with the MASP Implementation Group, allocated an additional population growth target of 10,000 persons to Maynooth in County Kildare over the period to 2031, as provided for under NPO 68 of the NPF. The draft JLAP states that this additional growth allocation will be accommodated in a manner that is in keeping with the principles of compact growth and the designation of Maynooth as a Decarbonisation Zone. The Kildare CDP 2023-2029 states that *'the precise population allocation that will be attributed*

*to Maynooth [under NPO 68] will be determined through the preparation of the Joint Local Area Plan...on foot of detailed assessments and audits of available social and physical infrastructure’.*

The draft JLAP provides further commentary on the above, and with the use of land use modelling scenarios through the Maynooth and Environs Area Based Transport Assessment (MEABTA), it was determined that the full 10,000 additional population allocated under the MASP (RSES period 2019-2031) could not be facilitated during the proposed plan period of the JLAP between 2025 and 2031. The modelling did however confirm that 50% of the 10,000 allocation could be accommodated in the road infrastructure of the town within the proposed plan period albeit still presenting challenges to both the road and public transport network in the town.

Table 3.1 of the draft JLAP provides the methodology for calculating the NPO 68/MASP allocation to Maynooth (Co. Kildare) which breaks down to an average of 4,375 persons or 1,591 residential units over the plan period (averaging at 625 persons per annum).

Table 3.2 of the draft JLAP outlines the housing and population allocations to Maynooth under the Kildare CDP 2023-2029, with 166 units per annum provided, extrapolated for 8 years (2023-2030) resulting in a target of 1,329 residential units in total. The additional population target for Maynooth up to 2030 is 3,656 persons (based on an average 2.75 persons per unit).

Table 3.3 of the draft JLAP outlines the housing and population for the Maynooth Environs area under the Meath CDP 2021-2027 (as varied) and based on the core strategy in the County Development Plan and extended by three calendar years to align with the lifetime of the draft JLAP. The population allocation under the Meath CDP is 1,000 persons with a housing target for 500 units. The annualised growth for the Maynooth Environs area is averaged at 83.3 units. The draft JLAP housing target in residential units is indicated to be 750 units up to 2030 with the equivalent additional population target of 1,875 persons up to 2020 based on a 2.5 persons occupancy rate. The table also explains that the majority of the above residential growth in the Environs area will occur outside of the Meath CDP 2021-2027 period. Table 3.4 of the draft JLAP provides an outline of the total housing and population allocation to Maynooth and Environs between 2024 and Q1 2031. The total residential unit allocation is 3,670, with a population target of 9,906 additional persons by Q1 2031.

For clarification purposes, the draft JLAP states that the proposed increase of 9,906 persons incorporates 50% of the overall NPO 68/MASP allocation to Maynooth, as calculated in Table 3.1 of the draft JLAP.

Section 3.3 of the draft JLAP explains how the above projected growth figures for Maynooth and Environs will be accommodated with National Policy Objective (NPO) 3c of the NPF requiring at least 30% of all new housing units to be delivered within the existing footprint of the settlement. The draft

JLAP states that this compact growth figure has been exceeded, with c.52% of all new residential units to be developed inside the built-up area of Maynooth.

In relation to the assessment of suitable lands to accommodate the above growth rates, a Settlement Capacity Audit was prepared and is published as an accompanying document of the draft JLAP to inform same.

Table 3.9 of the draft JLAP identifies the estimated residential capacity for lands zoned in Maynooth (Co. Kildare) with 69.3ha zoned for residential, the largest being the Railpark lands at 30.47ha in area. It is noted that the estimated residential yield for the approximate number of units to be delivered on residential zoned land in the draft JLAP is 3,174 units, being an excess of 254 units of the 2,920 units allocated to Maynooth derived from the Kildare CDP 2023-2029 and the NPO 68/MASP allocation. The draft JLAP does provide a justification for this excess figure having regard to Section 4.3.3 of the Development Plan Guidelines for Planning Authorities 2022 which states that *“in certain instances a planning authority may therefore provide zoned residential sites in addition to those required to meet the settlement housing supply target. This means that a planning authority, after identifying the site/land requirements to meet the housing supply target for that settlement, may also identify additional sites/lands to ensure sufficient choice for development potential is safeguarded”*. The draft JLAP indicates that *“it is not expected that all lands that have been zoned for new residential development within the town may come forward for development within the life of the Plan and therefore it is incumbent on the local authority to allow for a modest amount of excess new residential lands in order to provide for a level of flexibility within the Plan to ensure the overall housing target for the town is delivered”*.

In relation to new development areas, some areas of note include the ‘Maynooth Settlement Consolidation Site’ being a 5.7ha brownfield site close to the historic town centre, the existing train station and the Royal Canal and Harbour area. In addition, a new Transit Orientated Development (TOD) site in the western part of the JLAP area has been identified close to a planned second train station in Maynooth which has been designated as a Phase 2 site, subject to the agreement of a masterplan.

In relation to the Maynooth Environs area, Table 3.8 of the draft JLAP indicates that 23.08 ha of land is zoned for new residential development which is not in the built-up area of Maynooth. The estimated residential yield is 750 units based on a net density of 40.5 units per ha.

The Assembly notes that the land use zoning for the Maynooth Environs area in County Meath is already included within the Volume 2 of the Meath County Development Plan 2021-2027 (as varied) and no amendments to same appear to be proposed as part of this draft JLAP.

Having considered all the above, the Assembly is satisfied that the allocated housing figures for Maynooth and Environs in the draft JLAP are thought out, well-structured and explained in detail. The projected new housing allocations largely comply with the core strategies contained in both the Kildare and Meath CDPs save for the excess outlined in the County Kildare area of the plan regarding 254 units above the Kildare CDP 2023-2029 allocation of 2,920 units. Given the 'Key Town' status of Maynooth in the RSES and the provision of 52% of all new development occurring within the existing built up footprint of Maynooth as part of the draft JLAP adhering to compact settlement principles, along with the MASP allocation for an additional 10,000 persons in Maynooth as part of the transitional arrangements agreed with the Regional Assembly under NPO 68 of the National Planning Framework, the Assembly has no significant concern on this proposed aspect of the draft JLAP. The Assembly considers that the proposed growth areas for Maynooth as part of the draft JLAP align with RPO 4.36 of the RSES in relation to consolidation of the town centre. The RSES in relation to residential development also outlines the potential for the consolidation of the built form of Maynooth to the northwest and southwest of the town to provide for significant residential development, which has been provided for as part of the draft JLAP.

### **3.4 Delivering Place Quality in a Low Carbon Town**

Section 4 of the draft JLAP provides details as to how the plan will deliver place quality in a low carbon town. The draft JLAP has been framed around the concept of delivering a 10-minute settlement principle across the plan area. The draft JLAP aims to address the issue of permeability which represents a major impediment to realising the goal of the 10-minute settlement. Whilst the services of the town centre are noted to be within 800 metres (a 10-minute walk) of a large portion of the population, residents living on the periphery of the settlement will need to be proximate to a neighbourhood centre to cater for their immediate needs at a local level.

The above overall goal and the delivery of place quality in Maynooth, along with its designation as a town to deliver further substantial growth in addition to its designation as a Decarbonisation Zone in County Kildare to reduce carbon emissions, will require Maynooth to become a consolidated and integrated settlement that grows in a plan-led, phased manner based around the principles of healthy placemaking and people centred urban design.

The draft JLAP indicates that the above can be achieved by implementing the measures of 1) Quadrant Based Planning, 2) Enhanced Connectivity, 3) Enhancing Blue and Green Infrastructure and 4) Town Centre Consolidation and Renewal.

The draft JLAP explains that 'Quadrant Based Planning' measures will be critical to implementing the 10-minute settlement principle. The town centre will remain the primary focus for retail, commercial and social activities. However, there are three new neighbourhood centres proposed in the draft JLAP being to the north of the town proximate to the Moyglare Road, to the west of the town adjacent to the proposed second train station within the Maynooth West Transit Orientated Development site,

and a further neighbourhood centre proposed to the east of the town serving the 'Key Development Area' at Railpark.

Section 4.8.4.1 of the draft JLAP also provides commentary on the proposed Settlement Consolidation Site within the town centre adjacent to Maynooth train station (a planned future DART station). The site has the potential to accommodate a mix of uses including residential, student accommodation and a new community hub for the town. The draft JLAP includes an urban design framework for this consolidation site that maximises its potential as a walkable, legible and integrated neighbourhood adjacent to a high-capacity public transport corridor.

Whilst the overall development framework to implement the 10-minute town concept is noted and is a theme that cuts across a number of chapters of the draft JLAP as a mechanism to address climate change, the Assembly considers that the draft JLAP would benefit by drawing stronger references to climate change principles as set out in the RSES. The Regional Assembly considers that best practice should be applied in order to mitigate and reduce the effects of climate change, and in this respect the Assembly would like to draw attention to Figure 7.4 Climate Strategy of the RSES. In this regard the Assembly welcomes policy supporting urban regeneration and compact growth in the town centre which can also have a positive role in addressing the challenge of climate change. The Assembly also welcomes the Council's policy approach to flood and water resource resilience and natural flood risk mitigation through the use of Green and Blue Infrastructure and nature-based solutions. Furthermore, the Council's promotion of enhancing connectivity and active travel as part of its ongoing commitment to climate action is welcomed.

In relation to placemaking, it is considered that this section of the draft JLAP could be further strengthened by making reference to Healthy Placemaking RPOs 9.10, 9.12 and 9.13, and Figure 9.2 Healthy Placemaking Strategy of the RSES. This includes the 'Guiding Principles for the Integration of Land Use and Transport' in Section 8.3 of the RSES which mentions the need to manage space in town and village centres to deliver a high level of priority and permeability for walking, cycling and public transport modes to create accessible, attractive, vibrant and safe place to work, live, shop and engage in community life. The guiding principles also make reference to supporting the '10-minute' settlement concept whereby a range of community facilities and services are accessible in short walking and cycling timeframes from homes or accessible by high quality public transport to these services in larger settlements.

### **3.5 Homes and Communities**

Section 5 of the draft JLAP is concerned with social infrastructure and the Section states that a key function of the draft JLAP is to act as a driver in delivering an appropriate quantum and tenure of accommodation, while providing appropriate social infrastructure to complement this to provide for sustainable development for the future population of the town and its environs. The RSES further

highlights the importance of social infrastructure and states that the availability of, and access to services, contributes to creating healthier and attractive places to live. To facilitate the drafting of this section, a Social Infrastructure Audit was prepared for the town, and this informs the draft JLAP. Table 5.6 of the draft JLAP lists the social infrastructure requirements identified by the Audit.

Section 5 of the draft JLAP proposes objectives relating to residential tenure and mix, with a focus on providing accommodation for an aging population and providing traveller specific accommodation; education and training facilities; childcare; healthcare; open space, sports and recreation; social and community; and social infrastructure. The Assembly welcomes these objectives and notes that these align with various RPOs in the RSES, including RPO 9.1 in relation to the integration of age friendly and family friendly strategies into the plan, with a focus on flexible housing typologies and public spaces; and RPO 9.2 which is the support of initiatives to increase active participation and social integration of minority groups. In addition, Objective HCO 5.2 of the draft JLAP supports the development of a new primary care centre, which aligns with RPO 9.23 of the RSES which is concerned with facilitating the provision of primary health care centres in appropriate urban areas. Furthermore, the Assembly welcomes the narrative in the objectives to ensure accessibility for all, including Objective HCO 2.1 in relation to accessible housing types, Objective HCO 6.5 in relation to the provision of universally designed playgrounds, and Objectives HCO 7.1 and 7.2 with respect to a universally accessible locations for the Maynooth community library and community hub. These align with RPOs 9.12-9.13 ensuring that new social infrastructure developments are accessible and inclusive for a range of users and cater for persons with a disability.

### 3.6 Economic Development

The economic development strategy for Maynooth and Environs is contained in Section 6 of the draft JLAP and includes the strategic development principle '*Creating the Right Jobs, in the Right Places*'.

Figure 6.3 of the draft JLAP provides a broad outline of the economic strategy for Maynooth and Environs. The notable defined outputs of the proposed strategy include;

- 1) Setting a jobs ratio target of at least 1:1
- 2) Strengthening the knowledge economy
- 3) Proactively supporting the expansion of Maynooth University
- 4) Ensuring an adequate supply of zoned employment lands
- 5) Focusing on placemaking opportunities.

It is noted that the draft JLAP aims to achieve the jobs ratio of 1:1 by the end of the plan period (2031) so that that the growth in the number of jobs will match the growth in the population of people of working age in the town. The projected number of additional jobs required over the plan period to achieve this target is 6,568 jobs as set out in Table 6.1 of the draft JLAP. It is stated that this will enable Maynooth to transition from its role as a commuter town, becoming a key employment destination in the Dublin MASP area.

In relation to employment lands, Section 6.3.2 of the draft JLAP discusses strengthening the knowledge economy. It highlights that not only increasing the overall quantum of jobs based in the town is important but the type and nature of the jobs being created is also critical to Maynooth successfully fulfilling its role as an economic driver within the Dublin Metropolitan Area. Two specific areas in the draft JLAP have been identified on sectoral opportunities including;

- West of the University: Knowledge-based employment focusing on ICT and manufacturing through the development of a research and technology campus.
- Moygaddy: The development of Life Sciences, High Tech, Bio Tech, ICT, Research and Development and seeks to benefit from synergies with third level institutions which may include Maynooth University.

*The draft JLAP states that “delivering high quality locally based jobs within these locations will enable a greater proportion of the well-educated resident population within Maynooth to work near where they live, thereby reducing commuting levels and improving the overall levels of sustainability and liveability in the town. Crucially, the development of such land will support competitiveness and smart specialisations This in turn will further underpin Maynooth’s intended role as a preeminent settlement driving the growth of the MASP Economic Cluster – helping to achieve overall critical mass and economies of scale in the area”.*

Section 6.3.4 of the draft JLAP addresses the provision of an adequate supply of zoned employment land in the plan area to accommodate the ambitions of the economic strategy for Maynooth. Table 6.3 provides a survey of employment lands zoned under the 2013-2028 Maynooth LAP with 76.6ha of the 97.1ha of land zoned for employment purposes remaining undeveloped. In addition, the planning authorities have had regard to the Development Plan Guidelines for Planning Authorities (2022) and have published an Enterprise and Employment Zoning methodology to determine the overall quantum of employment lands to be zoned. Having regard to the above, it is projected that Maynooth and Environs will require 76.18 ha (net) of undeveloped land to be zoned for employment purposes (noting that this does not include other land use zoning objectives with the potential for job creation such as town centre, retail or leisure and amenity uses).

The retail strategy for the town is set out in Section 6.6 of the draft JLAP which acknowledges the position of Maynooth as a Level 2 Major Town Centre in the RSES and the Kildare CDP 2021-2027 County Retail Strategy. The inclusion and status of same supports Table 6.1 ‘Retail Hierarchy for the Region’ within the RSES.

In relation to the knowledge economy, and the focus of employment zonings to the west of the university in ICT and manufacturing sectors, and also the lands at Moygaddy focusing on science and technology-based employment, the Assembly considers this aspect of the draft JLAP to be in

adherence with the economic development vision for Maynooth as set out in Section 4.6 of the RSES. The ambitions for economic development in Maynooth align with RPO 4.34 of the RSES that aims to support Maynooth as a Key Town to act as an economic driver for north Kildare and provide for strategic employment at key locations to improve the economic base of the town and to provide for an increased number of local jobs.

Notwithstanding the information provided in Appendix B, the Assembly considers that the draft JLAP would also be further strengthened in relation to the identification of strategic employment sites in the draft JLAP by referring to the 'Guiding Principles to Identify Locations for Strategic Employment Development' as set out in the RSES.

### **3.7 Movement and Active Travel**

Section 7.2 of the draft JLAP acknowledges that Maynooth is affected by chronic levels of traffic congestion which is particularly concentrated within its historic town centre. Whilst its role as a university town can exacerbate both morning and evening peak traffic volumes, there are a number of other factors which contribute to the issue including Maynooth's accessible location on the periphery of the Dublin Metropolitan Area and being adjacent to other large and growing towns with heavy volumes of through traffic occurring to access the M4 motorway.

With the implementation of the 10-minute settlement principle one of the key challenges is to adhere to the ambitious growth targets set out for the town whilst also seeking to greatly reduce emissions from transportation as well as realise reduced levels of traffic congestion. The draft JLAP highlights the opportunities that arise to implement the 10-minute settlement concept in Maynooth, which is a key provision of the RSES. This concept provides for key community facilities and services to be accessible within a 10-minute walk (800m) or cycle from people's homes to ensure they are accessible by public transport services. In this regard, the draft JLAP aims to prioritise walking, cycling and public transport by maximising the number of people living within walking and cycling distance of the town centre, neighbourhood centres and public transport nodes, along with other facilities such as schools and parks.

As part of an evidence-based approach to planning, as set out in the RSES, a draft Local Transport Plan entitled the 'Maynooth and Environs Area Based Transport Assessment' (MEABTA) has been prepared to inform the drafting of the JLAP. It is stated that the role of the MEABTA is to provide an evidence base to enable the integration of land use and transport planning in Maynooth to deliver national and regional policy objectives relating to compact growth and sustainable mobility. The methodology adopted in progressing the draft JLAP provided for an innovative approach in which both the MEABTA and the Joint LAP were progressed in tandem as part of an iterative process.

Following a review of all supporting documents published as part of the draft JLAP, it does not appear that they include the MEABTA study referenced above. Notwithstanding same, Section 7 of the draft JLAP provides a number of short, medium and long term measures intended for implementation across the proposed draft JLAP period in relation to walking and permeability measures, cycling measures, complementary active mode measures, public transport measures, road measures and parking measures. In relation to public transport, particular mentions are provided in relation to the DART+ West project which is a railway project that will provide a sustainable, electrified, reliable and more frequent rail service, improving capacity between Maynooth and Dublin city centre which is scheduled to be operational by 2029.

A second train station for Maynooth is also referenced in Section 7.6.2 of the draft JLAP which acknowledges Measure RAIL 6 of the NTA Transport Strategy for the Greater Dublin Area 2022-2042 which provides for same at a location to the west of Maynooth.

The Assembly welcomes the preparation of the draft Local Transport Plan for Maynooth and Environs as part of the draft JLAP and considers that it aligns with RPO 8.6 of the RSES that requires the preparation of local transport plans for selected settlements in the Region, including Maynooth as a Key Town. Whilst the recommendations and measures arising from the local transport plan are noted in Section 7 of the draft JLAP, the Assembly would recommend that a full copy of the MEABTA be published as a supporting document of the Joint LAP. The measures outlined in Section 7 to promote compact growth and sustainable travel modes are supported by RPO 4.72 of the RSES relating to providing a transition to a low carbon town centre by reducing car usage and promoting walking and cycling. In relation to the Maynooth Outer Orbital Route, it is noted that there is specific mention of this project in Section 7.7.2 of the draft JLAP with corresponding objective MATO 4.4 'To support the phased delivery of the Maynooth Outer Orbital Road (MOOR) subject to planning and environmental considerations.' It is considered that this is a strategic piece of infrastructure for delivery in Maynooth listed in RPO 4.33 of the RSES for Maynooth and the above objective should be amended to reflect same.

### **3.8 Built Heritage and Archaeology**

Section 8 of the draft JLAP relates to the architectural and archaeological heritage within the JLAP area. Table 8.1 of the draft JLAP identifies 52 Protected Structures listed in the Record of Protected Structures of the County Development Plans for the plan area, with accompanying maps in Appendix A. Figure 8.2 also illustrates the location of an Architectural Conservation Area (ACA) within the town. Section 8 of the draft JLAP identifies objectives to safeguard the architectural and archaeological heritage of the plan area, including Protected Structures and the Maynooth Architectural Conservation Area. It is noted that Section 9.7 of the RSES identifies the importance of cultural, architectural, and archaeological heritage within the Region, particular in contributing to a town's identity, and the repair and reuse of historic buildings is identified as an integral part of sustainable

development. This is supported by objectives BHO 1.1 and BHO 1.2 of the draft JLAP in particular which ensure the protection, conservation and encouragement of use of Protected Structures, and BHO 2.2 which encourages the sensitive restoration and enhancement of shopfronts of architectural heritage. Furthermore, the objectives stated in Section 8 of the draft JLAP align with RPO 9.30 of the RSES which is concerned with supporting the sensitive reuse of Protected Structures.

### **3.9 Green and Blue Infrastructure**

Section 9 of the draft JLAP acknowledges that the majority of the plan area comprises either buildings and gardens or intensive agricultural lands, however, Maynooth contains a range of natural and semi natural habitats including hedgerows, treelines, woodland, semi natural grassland, watercourses and wetlands which contribute greatly to environmental quality, biodiversity and the creation of sense of place within the town.

Section 9.3 of the draft JLAP acknowledges that the objectives of the Maynooth Biodiversity Action Plan (BAP) 2023-2028, which provides a tool to facilitate the protection and enhancement of local biodiversity within the town, are contained within the draft JLAP insofar as it relates to the area and the remit of the draft JLAP. Furthermore, the preparation of the draft JLAP involved the undertaking of a Habitats Survey for Maynooth and Environs between 2021-2023, and this informed a Green Blue Infrastructure mapping exercise which was also undertaken. These have all assisted in the formulation of Green and Blue Infrastructure objectives, which include protecting and enhancing identified key Green and Blue Infrastructure (objective GBIO 2.1), encouraging the integration of innovative Green and Blue Infrastructure features into new developments (objective GBIO 2.9), and ensuring new proposals have regard to the future function and variety of open spaces (objective GBIO 2.4). These objectives align with RPO 7.22 of the RSES which requires that local area plans shall identify, protect, enhance, provide and manage Green Infrastructure in an integrated and coherent manner.

In relation to preparing a strategy and objectives relating to Green Infrastructure, it is considered that this section of the draft JLAP could be further strengthened by making reference to the 'Guiding Principles in the preparation of Green Infrastructure Strategies' in Section 7.7 of the RSES which mentions the need to identify and protect existing Green Infrastructure assets; the importance of connectivity; consideration of the ecological impacts of greenways; integrating an ecosystem services approach; carbon sequestration and integration with the natural and built environment.

### **3.10 Infrastructure and Environmental Services**

Section 10 of the draft JLAP relates to infrastructure and environmental services and outlines that a Settlement Capacity Audit was undertaken to inform the appropriate zoning of land and to ensure that residential and employment growth in Maynooth and its environs occurs in a phased and sequential manner.

Section 10.2.1 of draft JLAP states that Uisce Éireann confirms there is available water supply capacity in the town to meet targeted population growth to 2032 but an improvement to the level of service will be required. This may take the form of leakage reduction and/or capital investment to maintain or improve levels of service as the demand increase.

In relation to wastewater, Section 10.2.2 confirms that Maynooth forms part of the Lower Liffey Valley Agglomeration with Kilcock, Celbridge, Straffan and Leixlip. Uisce Éireann records indicate that there is available capacity at the wastewater treatment plant however this is for the entire catchment, not just Maynooth. It is highlighted that Uisce Éireann is constructing the Maynooth Wastewater Transfer Pipeline which will take all the flow from Maynooth and deliver it directly to the Leixlip Wastewater Treatment Plant without passing through the local Leixlip network. This project is expected to be completed within the life of the draft JLAP. Capacity to accommodate the full potential growth in Maynooth will therefore be restricted until the Maynooth transfer pipeline is completed.

The Assembly would welcome planned water supply and wastewater upgrades for Maynooth which would be supported by RPO 10.3 of the RSES in relation to co-operating with Uisce Éireann to ensure the delivery of their investments work programme to increase capacity to service settlements in accordance with the settlement strategy of the RSES and local authority core strategies.

Section 10.3 of the draft JLAP discusses surface water drainage and ground water with the promotion of SUDs and Nature Based SUDS (nbSUDs) in new development proposals as set out in the planning and development objectives is welcomed by the Assembly. It is noted that a surface water management strategy was prepared to inform the draft JLAP and is referred to in objective IO 2.2 of the draft JLAP.

It is considered that this aspect of the draft JLAP could be further strengthened by making reference to the guiding principles for Sustainable Drainage Systems as set out in Section 10.2 of the RSES. In addition, the planning authorities should note the recent publication of *'Nature Based Management of Urban Rainwater and Urban Surface Water Discharges – A National Strategy'* by the Department of Housing, Local Government and Heritage in May 2024 which is of relevance to the above.

Overall, the Regional Assembly welcomes Kildare and Meath County Council's commitment to the provision of high-quality infrastructure to ensure there is adequate capacity to support future development and will promote enhanced co-ordination between local authorities and infrastructure agencies for the delivery of strategic enabling infrastructure in a plan-led manner.

### **3.11 Implementation**

Section 11 of the draft JLAP provides commentary on how the strategic vision, contents and objectives for Maynooth and Environs over the plan period up to 2031 and beyond will be realised. The section includes more detail on the provision of a number of strategic development sites across the plan area

such as Section 11.1 Maynooth Central Settlement Consolidation Site including an urban design framework to inform its built form, Section 11.2 Maynooth West Sustainable Urban Extension including the proposed development of a Transit-Oriented Development site in the Maynooth West area close to the likely location of the new Maynooth West Train Station. Section 11.2.3 also provides detail on the proposed Maynooth West Long Term Strategic and Sustainable Development site (121.5ha) which is zoned SR (1) Strategic Reserve and SR (2) Strategic Reserve. The draft JLAP explains that the purpose of this designation is to provide a level of clarity as to the future development of the town as well as to safeguard these lands to ensure the orderly and sequential expansion of the town in the period beyond the lifetime of the Joint LAP (post 2031) as per the provisions of the Development Plans Guidelines for Planning Authorities (2022). The delivery of the strategic reserve lands will require significant transport and servicing and social infrastructure investment including the delivery of Section 1C of the Maynooth Outer Orbital Route which has a long term (6-10 years) horizon for delivery in Table 7.6 relating to road measures and phasing.

Section 11.3 provides more detailed commentary on the Maynooth Environs lands at Moygaddy (County Meath) that are identified as a Strategic Employment Site in the Meath CDP 2021-2027 (as varied). The aim of the plan is to focus on the delivery of Life Sciences, High Tech, Bio Tech, ICT and Research and Development employment opportunities. It is explained that the development of the lands at Moygaddy and Carton Demesne shall be subject to the preparation of master plans.

Furthermore, Section 11.4 outlines further guidance on the delivery of four 'Key Development Areas' (KDAs) in the plan area in County Kildare including Railpark; Crewhill; Rye Water Valley and Lyreen Avenue. These are considered strategic areas for the development of integrated residential neighbourhoods that will make an important contribution to the future growth and consolidation of the town. A design brief and urban design framework has been prepared for each KDA in the draft JLAP based on an appraisal of each area in its respective contextual environment.

Section 11.5 provides a detailed breakdown on implementation and infrastructure delivery including a schedule of expected timeframes for delivery, with Table 11.5 relating to residential lands and Table 11.6 relating to employment lands.

Overall, the Assembly welcomes the detail that has been provided by the planning authorities in Section 11 of the draft JLAP in relation to implementation strategy for strategic and key development areas in Maynooth and Environs along with expected timeframes for the provision of supporting infrastructure to service same. It is considered that the inclusion of this section provides greater clarity on the short, medium and long term development strategy for the entire plan area and aligns with RPO 4.33 in the RSES which supports the continued development of Maynooth, co-ordinated with the delivery of strategic infrastructure, in addition to RPO 4.36 which promotes the consolidation of the town centre with a focus on the regeneration of underused buildings and strategic sites.

It is, however, recommended that in relation to Objective MWO 1.1 in the draft JLAP that seeks to support and facilitate the development of a Transit Oriented Development (TOD) site surrounding the location of a proposed new train station at Maynooth West, that the Regional Assembly be included as one of the stakeholders that will be engaged by the planning authorities in the future development of this area of Maynooth.

### 3.12 SEA, AA and SFRA

The Assembly welcomes the preparation of the draft JLAP in tandem with the required environmental processes, namely Strategic Environmental Assessment (SEA), Appropriate Assessment (AA) and Strategic Flood Risk Assessment (SFRA).

The SEA Environmental Report sets out an assessment of the environmental effects in combination with the wider planning framework arising from the draft JLAP to provide a clear understanding of the likely environmental consequences of decisions arising from the JLAP. Regarding mitigation, the draft JLAP states that the SEA Environmental Report published as part of the plan provides a clear understanding of the likely consequences to the environment of decisions regarding the location of development in the plan area. The mitigation measures needed to offset the potential adverse effects of the plan and future monitoring proposals have been transposed from the Environmental Report into the draft JLAP.

The draft JLAP was also subject to Appropriate Assessment (AA) and a Natura Impact Report (NIR) has been prepared as an accompanying document to the overall draft Plan. The NIR concludes that mitigation measures are necessary to avoid adverse effects on the integrity of the Rye Valley Water/Carton SAC (in the plan area) and mitigation measures have been recommended as part of the AA report. With the implementation of mitigation measures recommended within the AA report, there is sufficient evidence for the AA to conclude that the implementation of the draft Plan would not result in adverse effect on the integrity of the Rye Valley Water/Carton SAC, either alone or in combination with other plans or projects.

Finally, a Strategic Flood Risk Assessment (SFRA) has been undertaken, which aligns with RPO 7.12 of the RSES, alongside the preparation of the draft Joint LAP, the SEA and the NIR. The recommendations from the SFRA have been integrated into the draft JLAP which is welcomed. In keeping with best practice, it is recommended that the Local Authorities take opportunities to enhance biodiversity and amenities, including where flood risk management measures are planned, in line with RPOs 7.14 and 7.15 of the RSES.

## 4.0 Recommendations

The Regional Assembly would like to acknowledge the extensive work that both Kildare and Meath County Councils have carried out in order to prepare the draft Maynooth and Environs Joint Local Area Plan and, in particular, the overall approach and effort of the Councils to coordinate and incorporate policies and objectives so that they are consistent with the RSES is welcomed.

The Regional Assembly advises that Kildare County Council and Meath County Council pay particular attention to the following issues in the preparation of the Maynooth and Environs Joint Local Area Plan 2025-2031 in order to ensure consistency with the RSES, and makes the following recommendations:

### Climate Change

- Section 5 of the draft JLAP could be enhanced by referring to Figure 7.4 Climate Strategy of the RSES.  
Reason: In order that best practice is applied to mitigate and reduce the effects of climate change.
- The draft JLAP should align with RPOs 7.14 and 7.15 of the RSES regarding flood risk management.  
Reason: In the interest of demonstrating consistency with the RSES in relation to flood risk management and biodiversity.

### Economic Development

- Section 9 of the draft JLAP could be further strengthened in relation to the identification of strategic employment sites in the draft JLAP by referring to the 'Guiding Principles to Identify Locations for Strategic Employment Development' as set out in Section 6.3 of the RSES.  
Reason: In the interest of proper planning and sustainable development.

### Transportation

- The Maynooth and Environs Area Based Transport Assessment (MEABTA) which has informed the preparation of the draft JLAP should be published as a separate document and included as part of the appendices of the JLAP.  
Reason: In interests of proper planning and sustainable development.
- In Section 7 of the draft JLAP, the text of objective MATO 4.4 should be amended as follows 'To support the phased delivery of the Maynooth Outer Orbital Road (MOOR) subject to planning and environmental considerations. The development of the MOOR is identified as a strategic piece of infrastructure for delivery in Maynooth as included in Regional Policy Objective 4.33 of the Regional Spatial and Economic Strategy 2019-2031 for the Eastern and Midland Region.'  
Reason: To ensure alignment with RPO 4.33 of the RSES.

- In Section 11 of the draft JLAP, the text of objective MWO 1.1 relating to the development of a Transit-Orientated Development (TOD) site in Maynooth West should include the Regional Assembly as one of the key stakeholders to be consulted as part of the TOD process.  
Reason: To ensure alignment with Table 5.1 in the RSES in relation to the Dublin MASP and the North-West Corridor that includes Maynooth.

#### Infrastructure and Environmental Services

- Section 10 of the draft JLAP could be further strengthened by making reference to the ‘Guiding Principles for Sustainable Drainage Systems’ as set out in Section 10.2 of the RSES.  
Reason: In the interest of demonstrating consistency with the RSES.
- The draft JLAP should note and reference the recent publication of ‘*Nature Based Management of Urban Rainwater and Urban Surface Water Discharges – A National Strategy*’ by the Department of Housing, Local Government and Heritage, May 2024.  
Reason: In the interest of proper planning and sustainable development.

#### Placemaking

- Section 4 of the draft JLAP should align with the Healthy Placemaking RPOs 9.10, 9.12 and 9.13, and Figure 9.2 Healthy Placemaking Strategy of the RSES.  
Reason: In the interest of demonstrating consistency with the RSES.
- Section 4 of the draft JLAP could be further strengthened by making reference to the ‘Guiding Principles for the Integration of Land Use and Transport’ in Section 8.3 of the RSES which promotes the need to manage space in town and village centres to deliver a high level of priority and permeability for walking, cycling and public transport modes to create accessible, attractive, vibrant and safe place to work, live, shop and engage in community life.  
Reason: In the interest of proper planning and sustainable development.

#### Green Infrastructure

- Section 9 of the draft JLAP could be further strengthened by making reference to the ‘Guiding Principles in the preparation of Green Infrastructure Strategies’ in Section 7.7 of the RSES which mentions the need to identify and protect existing Green Infrastructure assets; the importance of connectivity; consideration of the ecological impacts of greenways; integrating an ecosystem services approach; carbon sequestration and integration with the natural and built environment.  
Reason: In the interest of proper planning and sustainable development.

## 5.0 Conclusion

It is considered that the draft Joint Maynooth and Environs Local Area Plan 2025-2031 is generally consistent with the Regional Spatial and Economic Strategy (RSES) 2019-2031 and would be further enhanced by addressing the recommendations set out above.

It should be noted that the officials of the Eastern and Midland Regional Assembly are available to discuss the matters raised and the Assembly welcomes further opportunities to engage in the statutory process of the making of the draft Maynooth and Environs Joint Local Area Plan.

Regards,



Clare Bannon  
A/Director  
Eastern and Midland Regional Assembly  
29<sup>th</sup> of July 2024