



Pre-Draft Stage of  
Kildare County  
Development Plan  
2023 – 2029  
Issues Paper  
Consultation

KILDARE CLIMATE ACTION  
LINKAGE GROUP SUBMISSION  
MARCH 2021



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## **Abbreviations**

CDP	County Development Plan
EPA	Environmental Protection Agency
ICW	Integrated Constructed Wetlands
IFI	Inland Fisheries Ireland
KCALG	Kildare Action Linkage Group
KCC	Kildare County Council
KWETB	Kildare and Wicklow Education and Training Board
NPF	National Planning Framework
OPW	Office of Public Works
PPN	Public Participation Network
SPC	Strategic Policy Committee
SUDS	Sustainable Urban Drainage Systems
WFD	Water Framework Directive
WWTP	Wastewater Treatment Plants

## **Acknowledgement**

We would like to sincerely thank the countless volunteers who gave their time and expertise to contribute to this submission.

## 1.0 Introduction

Kildare Climate Action Linkage Group (KCALG) welcomes the opportunity to provide a submission as part of the *Pre-Draft Stage of Kildare County Development Plan 2023 – 2029 Issues Paper Consultation*. We see the creation of this new County Development Plan (CDP) as a very timely opportunity to refocus efforts to forge a more sustainable and resilient Kildare. We want the new CDP to have a strong community focus, and to set Kildare on an ambitious trajectory of actions that will reduce our climate impacts, reverse biodiversity loss, restore habitats, and create a thriving, truly sustainable Kildare.

### 1.1 Background to Kildare Climate Action Linkage Group (KCALG)

Linkage Groups are the thematic networks at the core of the Public Participation Network (PPN). They are the main vehicles through which the PPN advocates for the Community.

Following the establishment of the Climate Action Strategic Policy Committee (SPC) in 2020, the KCALG was established to ensure the wider voices of the community were heard and represented through the SPC.



Figure 1 A Sample of the Climate Action Linkage Group Members

Since its inception, the KCALG has grown to nearly sixty members, made up of a wide range of committed and passionate community groups, some of which are shown in Figure 1.0. The KCALG is open to all to attend.

Our **Mission** is to work with Kildare County Council (KCC) to design and drive both policy and projects that deliver best in class climate action, mitigation, and adaptation measures. Our **Vision** is that Kildare is transformed into a low carbon, sustainable county with communities at the heart of the transition.

The KCALG meets twice per quarter, before and after each SPC Meeting. Two elected reps attend the SPC to represent member's interests and provide updates following each SPC meeting. The KCALG provides relevant information to members on areas of interest such as funding streams, upcoming policy reviews, upcoming consultations, etc. The KCALG also hosts consultation sessions and invites subject matter experts to address the group as needed.

### 1.2 Subgroups

Given the rapid growth in membership of the KCALG, several subgroups were established to allow members with expertise or interests to contribute in a more targeted way. The themes of our subgroups are: Biodiversity, Circular Economy, Community Activation & Wellbeing, Green Economy, Sustainable Energy, Sustainable Transport and Water.

The Subgroups meet every second month and conduct a range of activities including:

- Establishing and maintaining an action plan of climate action projects
- Identifying and reaching out to existing networks
- Identifying possible funding streams for projects
- Identifying barriers that exist in relation to getting projects completed
- Establishing and maintaining a policy action plan
- Identifying issues to be raised at the Climate Action SPC

### 1.3 Climate Change and Biodiversity Loss

The growth in the KCALG is a direct reflection of the growing concern and awareness of the impacts of Climate Change and Biodiversity Loss in Kildare and beyond. Given the exponential nature of both the climate and biodiversity crises, we argue that these two themes should be central to the Kildare County Development Plan, and that the Plan should take a 'Climate and Biodiversity First' approach, rather than being secondary to any development/economic objectives.

We have been informed at the various information sessions regarding this consultation that "*Climate Action will permeate all actions of the Kildare County Development Plan 2023-2029*". We really hope this sentiment is sincere and that this commitment is reflected in the County Development Plan.

Since the publication of the existing Country Development Plan in 2017, Ireland has continued to experience worrying levels of biodiversity loss, increases in emissions, more frequent extreme weather, and growing inequality. The declaration by KCC of a Climate and Biodiversity Emergency was a welcome development, but this declaration must now be matched with ambitious and courageous action, that will set KCC apart as a leader in this space. The CDP provides a unique opportunity to make this happen.

The KCALG has spent considerable volunteer time and effort researching, discussing, and collating this submission. We are urging KCC to take on board ordinary people's concerns about both climate change and biodiversity loss. We must identify that it can no longer be 'business as usual' and unsustainable economic growth cannot continue to be supported.

We are loudly saying that the next CDP must halt some of the unsustainable environmental practices that have continued despite the countless reports and rhetoric. We need to place climate change and biodiversity loss as the central tenets of this CDP with clear measurable objectives and accountable reporting, and with communities at its core.

## 2.0 Response to Kildare County Development Plan Issues Paper

This Section provides the responses of KCALG to the numerous questions set out in the Issues Paper. Several of the Issues set out by KCC overlap, with some questions being repeated throughout the document. We have endeavoured to provide concise answers but would urge KCC to take into account the holistic nature of this document and acknowledge that many of our responses can address more than one of the Issues identified.

### 2.1 Healthy Placemaking: People and Places

#### *What tools can be used to deliver compact growth to assist in the regeneration of our towns and villages?*

- Investigate how the concept of 10/15-minute towns such as those trialled in Paris and elsewhere, can be applied to Kildare towns and villages.
- Wellbeing indicators should be introduced to measure the true value of regeneration, that considers health, happiness, and environmental factors.
- Consideration should be given to the Town Centre first approach as established in Scotland.
- Exploring the viability of living above commercial premises and regenerating vacant buildings.
- Opportunities exist to pursue a hybrid approach, such as the 'cluster approach' being piloted in Tipperary, where land is developed on the periphery of towns and villages. This approach allows homeowners the flexibility of living on their own plot, while also maintaining strong links to the local village or town. This ensures services are within reach, sustainable mobility is possible, and helps to protect the viability of our rural towns and villages.

#### *How should we ensure the protection of the countryside and the regeneration of our towns and villages while providing for sustainable rural housing which meets the genuine housing needs of rural dwellers and protects finite environmental resources?*

- There should be stringent demonstrable criteria to prove a genuine requirement for rural housing. Expansion of rural housing is not compatible with many of the goals around climate and biodiversity.
- Rural housing where it is deemed a genuine requirement should be developed as communities of houses with shared facilities and developed in accordance with international best practice for climate goals and biodiversity goals.
- All new rural houses should maximize best available technology including heat pumps.
- The council must ensure that the provision of essential services, such as, electricity, broadband and water is adequate in towns and villages and that the true cost of these services be reflected in rural areas.
- Vacant and derelict buildings should be brought back into use with the help of grants from the county council or other financial incentives.
- Alternatives to one off housing should be explored within and around towns and villages to reflect changing needs of homeowners as they move through life stages. Options to upsize and downsize should be available, to help manage demand and development needs, while allowing residents to remain in their communities.
- Refuse planning permission for housing which would impact existing wetlands (which lock up large amounts of carbon).
- Ensure that developments incorporate correctly installed sustainable drainage systems.
- Planning permission for development to be given for greenfield sites only where it can be demonstrated that all efforts to build on brownfield sites have been completely exhausted.
- Planning permission for all developments (business, single houses, housing developments) needs to have strict enforceable conditions around all areas relating to Climate and Biodiversity. There

should be much less developer leeway on this. Development should not be developer lead. If Kildare Co. Co. has identified where development and growth will be – they should drive the development process and impose strict requirements for :

- best practices for building a community
- best practices for multigenerational communities
- efficient use of resources
- BER to be achieved, renewable energy, the initial premise should be that the development is to be self-sufficient for energy (through solar on roofs, heat pumps, etc.)
- self-sufficient for grey water (rainwater harvesting, and grey water re-usage)
- flood management using best practice building, for example, permeable paths, swales etc.
- biodiversity preservation and management.

Currently throughout Kildare we see developments being built which are not climate proofed, are not built to current best practice, have no natural flood management systems installed, and are currently ripping out hedgerows and destroying habitats.

#### *How can we encourage the delivery of multigenerational housing schemes to cater for our aging population and what models of housing can be developed to enable their preference to remain living in their own communities?*

- Every town and village in Kildare should have centrally located supported independent housing facilities for our elderly community near a day care centre, for example, elderly housing in Maynooth.
- There should be a greater selection of houses available including small first-time houses, houses with granny flats , the option to subdivide houses, as well as to live above shops and commercial outlets, and a greater range of sheltered accommodation such, for example, Mc Auley place in Naas.
- Schemes should be designed to the highest levels of energy efficiency to address energy poverty and ensure universal access to warm, dry and comfortable homes.
- Schemes should include transport links to ensure our elderly population have safe, easy access to essential services.

#### *How can we protect and enhance the quality of our built and natural environment to enable a more active, healthier lifestyle?*

- Developments should be considered in a holistic manner. Considerations such as access to green space, permeability, and strong and safe active mobility links should all be mandatory asks.
- More consideration should be given to the connectedness of developments and stringent efforts should be made to move away from ad-hoc planning.
- Strict conditions should be set, and more importantly enforced, on developers to ensure the inclusion of high-quality design that promotes more active, healthier lifestyles as part of proposed developments.

#### *How do you think vacant and derelict buildings can be brought back into use?*

- By promptly enforcing the Derelict Sites Act, 1990 (as amended by the Planning and Development Act, 2000)
- By promptly enforcing the Urban Regeneration and Housing Act 2015
  - There are currently six properties in the whole county on the vacant sites register. If this register were actively managed and the vacant site fee collected, these funds could be put to great use if invested in the communities affected.

- Additionally, this would greatly encourage owners to develop these sites and revitalise town centres. There are many derelict sites in all of our towns in Kildare. This is an area where the council can exert great control and legislation should be enforced.
- A pilot scheme to show the wide range of uses of these buildings, particularly in town centres, could drive interest in refurbishing vacant and derelict buildings.

*Are there measures we could include in the Plan to address the issues associated with the current housing crisis?*

- KCC needs to ensure it plays an active role in ensuring the housing crisis does not deteriorate further.
- Creative solutions such as utilising vacant sites and living over commercial units should be explored.
- All developments should be to the highest standard, ensuring homeowners enjoy a warm, comfortable home, that is designed to reduce environmental impacts and keep utility costs low.
- All housing measures should allow people to live with dignity and a sense of community and not create substandard tenements.

*What lessons can we learn from the Covid-19 pandemic on how we use our buildings or land?*

- One of the positive outcomes of the Covid-19 crisis has been our recognition of the benefits of the natural world and the great outdoors to our mental health and wellbeing. However, because of the movement restrictions imposed, and our confinement to our own localities we have seen first-hand how limited our access is to green open spaces particularly those provided by and maintained by our Local Authority. We see how lacking we are in outdoor facilities that provide outdoor activities and amenities that suit all ages and abilities, we find ourselves depending on the goodwill of private landowners for access to their parks and playing fields.
- Spatial justice should be a core consideration for developments in Kildare. Everyone should have access to green spaces. This is not only a Covid-19 issue, but a prominent health issue as data indicates those with less access to green space suffer from low levels of Vitamin D, causing negative health impacts.

*How can we move towards higher density housing developments which are attractive, practical and viable? Are there areas of the County that could accommodate taller buildings?*

- Pursue a housing model (either directly or through private development) which is self-containing in terms of energy requirements and seeks to reduce the overall carbon/environmental footprint, such as:
  - Incorporation of passive solar heating, solar panels and other renewable forms of energy in all new housing developments.
  - Rainwater harvesting and grey water reuse in all new housing developments.
  - Incorporation of sufficient communal, well-planned, suitably screened spaces in all new apartment complexes for:
    - waste separation
    - airing laundry (rather than balcony spaces)
    - Secure bicycle lockups
    - Create storage space for sports equipment
    - Shared facilities and equipment
- Pursue a housing model (either directly or through private development) which provides quality living conditions for the residents through the incorporation of:

- Sufficient communal well-planned and safe garden spaces for children to play and for people to sit outside in fresh air and build community and give residents autonomy over these.
- Get rid of the management company model completely or change the model so that owners and tenants take responsibility and have decision making for shared spaces and resources. This will empower people and involve them.
- Gradually change the model of housing estates and developments so that they are managed by a co-operative of the owners/tenants who are aware of their rights and responsibilities.
- Expecting everything to be done by the Council or by Resident's Associations or Management Companies is disempowering, as residents then feel they that have no right to do anything.
- Pursue a housing model (either directly or through private development) which provides quality living conditions for the residents through the incorporation of:
  - sufficient communal well-planned and safe garden spaces for children to play and for people to sit outside in fresh air and build community.

***How can we effectively address the Climate Change Crisis and the Biodiversity Crisis, through the Development Plan process?***

- Take a ***Climate and Biodiversity First Approach*** to every decision made:
  - The Development Plan should serve to protect our climate and biodiversity, enable progressive action on both, and at a minimum, ensure no negative impacts on either climate or biodiversity through any of KCC's actions or decisions.
  - Appropriate measures and metrics should be defined that go beyond traditional Development Plan metrics.
  - Natural Capital metrics, and Emissions (Scope 1,2, and 3) including embodied carbon should all be considerations as part of the Development Plan.
- Enable climate and biodiversity literacy and education for those responsible for the creation of the CDP.
- Seek relevant expertise from a wide range of stakeholders to ensure all views are considered.

## 2.2 Economic Opportunity: Innovation, Enterprise, and Employment

*How can we secure an economic environment for County Kildare which will future-proof its current jobs, attract new jobs into the future and provide an economic environment which is adaptable to change?*

- Through taking a **Climate and Biodiversity First Approach**, industries and sectors can be assessed for their readiness for the climate transition, and their likelihood of long-term viability. If industries and organisations have not suitably planned for a sustainable business transition, they are not likely to be future-proofed.
- Promote environmentally sustainable jobs which provide our young people with rewarding livelihoods, where they will have the opportunities to contribute to their communities, as well as ensuring a Living Wage.
- Foster jobs and livelihoods in our county, where wealth is distributed equitably in the community, instead of under the control of a few. Ensuring that those industries and businesses that are encouraged to locate here, are transparent in their treatment of workers and suppliers, and who can provide proof of their positive climate and biodiversity impact.
- By creating the right environment, progressive, climate positive industries will be attracted to locate in Kildare, as will their employees who are increasingly looking to live in communities with ample green space, access to sustainable mobility, and creative areas to work from.

*How can the Plan ensure a strong economy, supported by enterprise and innovation?*

- If a strong economy is to be fostered, the Plan needs to ensure enterprise and innovation is future focused and does not lead to investment in industries that may become stranded assets as the climate transition amplifies.
- Strong collaborations should be fostered with educational institutions to create innovation and start-up hubs to create solutions and new ideas to address the climate and biodiversity crises.
- Support structures such as the Local Enterprise Office, should have a core focus on climate and biodiversity issues, with any funding or supports being weighted in favour of those companies or ideas that can prove their positive impacts.
- The Local Enterprise Office and other relevant staff should be upskilled in the area of sustainable enterprise and gain a strong understanding in areas including climate risk, climate disclosure, science-based targets and circular economy, so that they are prepared to support companies in the county.
- Engage with experts frequently on emerging green economy thinking including technology, new regulations, and new innovations.

*How can the Plan support indigenous small-scale enterprise, agriculture, the equine industry and rural enterprise?*

- Local farming should be encouraged alongside more allotments and community markets and gardens.
- Small and Medium Enterprises should be supported through the Local Enterprise Office and Innovation Hubs, with supports weighted towards those with a sustainability focus.
- Metrics to measure enterprise should not be limited to investment or number of jobs. Metrics that take account of an enterprise's full impact including on the environment, whether positive or negative, should also be included.
- By capitalizing on our natural assets rather than exploiting them for short-term gain.
- By educating the community on the importance of supporting local farming etc.
- By looking at other models across the country.
- By providing supports such as Innovation Hubs, Maker Spaces, Market Spaces, Shared Services and others to help start ups and small companies to grow and scale.

- Foster agriculture and industry where Irish production does not contribute to:
  - the destruction of ecosystems and habitats in other parts of the world
  - climate change effects in other parts of the world
  - the depletion of resources in other parts of the world
  - and hence contribute to the global movement of migrant workers.
- Build on the growing number of ‘Farming for Nature’ and Organic Farms in the county.
- Identify and quantify the risks to our small-scale enterprise, agriculture, equine industry, and rural enterprise of not adequately acting on the climate and biodiversity crises. For example, inaction will make farming riskier through increased weather events including drought and flooding. The inputs our equine industry depend on will also be at risk.

#### ***How can the Plan support the education and skills sector?***

- By supporting the integration of educational programs that will result in local employment.
- By liaising with NUI Maynooth and other educational bodies and establishing formal, strategic partnerships.
- By developing a Centre of Excellence to provide courses that support sustainable industries.

#### ***What are the infrastructural shortfalls which are hindering economic growth and development in the County?***

- There are many infrastructural deficits that inhibit our environmentally sustainable economic growth and development, for example on Infrastructure relating to:
  - Sustainable travel
  - Sustainable energy provision
  - Broadband etc.
  - Take back infrastructure for the circular economy
- Connectivity throughout the county is a vital enabler of growth and development.
- Attracting future fit industries, and their employees, will require much more focus on creating a liveable, connected, healthy and sustainable county where the majority will not need to commute to Dublin and other locations every day.

#### ***How can we support and protect traditional onstreet retailing with the increase of online shopping and encourage new business looking to locate within our town centres?***

- Provide financial support for start-ups – in terms of removing/reducing commercial rates for the first two years of trading for certain businesses e.g., vegetable shops, local produce, organic foods, shoes and clothing, crafts.
- Provide support for ‘Start your own business’ courses.
- Actively promote and translate the benefits of shopping small and shopping locally to the public.
- Actively promote and translate the benefits of locally produced, affordable, sustainable food models.
- Additional cycling infrastructure as cyclists will lead to increased footfall and additional spend in local areas.
- Facilitating the development of placemaking in our town centres. Safe, accessible areas where customers can rest, enjoy some food, meet others. Our current levels of car dependency impose congestion, health and environmental costs on our trading sectors.
- Increasing sustainable mobility and connectiveness to our retailers.
- Supporting initiatives to encourage commercial enterprises to enhance their premises.

#### ***How can the Plan best support new and evolving economies in an era of e-business, work patterns that reduce the demand to travel and promote home based economic activity?***

- It is necessary to provide employment hubs in local areas, a building where workers can go in their local area to do their job, available within walking/ cycling distance of home.

- Have a dynamic skill set in the Council that can quickly recognize what the new and evolving economies might be, whether they are likely to be beneficial to the community's vision and whether they will therefore be given additional support.
- Create places that encourage workers to exercise, eat lunch, host meetings in our town centres.
- Ensure broadband keeps up with developing needs.

***What policies and developments can support increased employment in the County, such as coworking hubs, 'maker spaces,' incubation hubs, creative hubs/town initiatives and synergies with Maynooth University?***

- The County Council should provide an Education Officer whose mission would be to encourage innovation and enterprise within the county. This officer could be attached / connected to Maynooth university.
- Support collaboration between diverse skill sets, such as artists, academics, youth workers, teachers to come up with creative solutions to the immediate problems we face.
- Transport link needed between Maynooth and Naas.

***What can the Plan do to support tourism in Co Kildare? Are there areas that have the potential to be developed for tourism and recreational purposes?***

- There are many local possible tourist spots that need to be checked and possible plans for their development put into place.
- Future possible greenways, blue ways and other tourist trails should be identified.
- By developing cycle ways to access the raised bog lands and fens, particularly as an offshoot of the Grand Canal cycle way.
- Maximize the connectivity of the Green and Blue infrastructure, particularly through cycleways
  - For example, there is a potential greenway between Edenderry in Co. Offaly and Enfield Co. Meath along the path of the former railway. It would form part of an outer loop between the Royal and Grand Canals. The loop could also connect with the Barrow at Rathangan via low trafficked rural roads.
- Ensure that the development of cycleways etc do not lead to tourists simply passing through.
- Ensure that solar/wind farms are balanced with tourism plans.
- Making our towns more accessible by bike or on foot.
- Promote the development of a county-wide tourism strategy, capitalizing and integrating our geological and landscape heritage; habitats of European and National importance (SACs, SPAs, NHAs and pNHAs); built heritage and remaining areas raised bogs, fens, rivers and woodlands that traverse our county.
- Be creative about tourism in County Kildare. The community have many ideas and they just need to be empowered and enabled to put these in action. For example, Kilcock Community Gardens Group envisioned a "Kilcock of the Gardens", creating a walking trail around Kilcock going from one themed garden to the next, each of them in the various estates or public spaces. This is just one example that the group came up with it in a very short brainstorming session. There is no shortage of ideas and enthusiasm. But relying on the volunteer sector alone is not viable for this. Dedicated paid positions within each area, depending on the size of towns with clear job specifications around:
  - creating resilience in the community
  - empowering community
  - facilitating community activation and
  - specifically achieving agreed projects
- Ensure that the harbour area of Naas is developed in an environmentally and architecturally sound manner and which encompasses the canal link to Corbally Harbour. This will also allow for an 8km stretch of uninterrupted canal travel waters which are invaluable to the promotion of growth of tourism. This will also provide additional walking and cycling routes for the Kildare environs.

- The Council must work with Irish Waterways on the removal of Kissing Gates which make canals in-accessible for many wheelchair users and cyclists. Everybody should have the right to gain access to enjoy our natural heritage.

***What measures are required to make our towns and villages more vibrant and attractive as places to live in, work in, shop and visit?***

- Reverse and mitigate some of the decline in our towns in recent years by:
  - halting any further poorly finished apartments/housing schemes
  - enhancing green spaces
  - supporting initiatives to encourage commercial enterprises to enhance their premises
  - promptly enforcing the Derelict Sites Act, 1990 (as amended by the Planning and Development Act, 2000)
  - actively enforcing anti-litter and dog fouling campaigns
  - encouraging small shops and local businesses/crafts
  - making our towns more accessible by bike or on foot.
- Provide bathrooms and changing rooms in key tourist centres, racecourses, and shopping centres, including Changing Places<sup>1</sup> bathrooms.
- If we create our towns as attractive places to go to by:
  - use of active transport which reduces traffic
  - greening of the streets
  - permeability throughout the town making it easy to get to town centres
  - identification of gaps in our locally provided needs
  - development of all derelict buildings in town centres

***Are there economic opportunities associated with climate change mitigation that the Plan can harness?***

- By definition, any opportunity that reduces the effects of climate change will have an economic benefit.
- Rewetting of our bogs has obvious tourism potential.
- Support for training in replacement technologies.
- Carry out a review of the county in terms of resilience.
- Support circular economy, green tourism, repair cafes, zero waste stores.
- No, or low, commercial rates on businesses that are set up for sustainability, for example, zero waste stores.
- Protection of on-street shopping.
- Introduce rules to make it easier for sustainable businesses to set up, and harder for non-sustainable ones, for example, a large vacant store in Kilcock recently opened as a discount store. This is not in line with any sustainability ideals or goals, and the community would have been better served with a zero-waste store or pretty much anything else.
- Bord Na Mona are establishing a new building in Newbridge. There is potential for this development to become a Sustainable Energy Hub or a Circular Economy Hub. Similar to the Rediscovery Centre<sup>2</sup> (Ballymun) or Circuléire<sup>3</sup> in Mullingar.
- Support MERITS in hosting sustainability pre accelerator programme (start-ups)
- Assessing planned developments such as the new Athy Food Hub. How can they embed sustainability? Developing a Green Building, focus on sustainable food?
- Local Enterprise Office to increase focus on sustainable enterprises and sustainability related courses.

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<sup>1</sup> <https://changingplaces.ie/>

<sup>2</sup> <http://www.rediscoverycentre.ie/>

<sup>3</sup> <https://circuleire.ie/>

- Expansion of Climate Innovation Initiative launched in Celbridge/Leixlip MD to all MDs.
- Support sustainable enterprise in county e.g., The Library of Things<sup>4</sup> is a place where people can borrow items only needed occasionally or that are too bulky or costly to own.
- Support the upcycle movement designs solutions to combat textile waste.
- Support plastic- free, waste-free and chemical-free shops eg. Reuzi (Blackrock) one stop shop for organic, eco friendly natural products.
- Support Green tourism e.g. Hotel Doolin first certified carbon neutral hotel in Ireland.
- Incentivise or support no plastic packaging food suppliers.
- More outdoor dining facilities: Embrace and adapt the New York “Open Streets Restaurants Programme” to our climatic conditions.
- Convert derelict town centre sites to remote and flexible working hubs or pop-up shops. This will help boost local economies.
- Meet local needs as far as possible. Change bye-laws to ensure that farmer’s markets and other local initiatives/markets are not hindered by prohibitive legislation.
- Identify where we are at risk in terms of sustainability, for example:
  - energy
  - food
  - water
  - Employment
  - cultural
  - social
  - infrastructure
  - human skills and expertise
  - health of community
  - engagement of community
  - capacity of community
  - preparedness
  - cohesion and cross community link

This will help identify threats and opportunities. Opportunities can translate to business and economic opportunity. Engage local community in all of these efforts. KWETB are already doing some of this. Make it organised. Take control of it. People know we have huge issues. They want to see local government taking radical direct convincing action.

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<sup>4</sup> <https://www.libraryofthings.co.uk/>

## 2.3 Climate Action: Environment, Climate Change and Adaptation

### *How can the Plan best address the challenges of climate change?*

- The Plan should take a Climate And Biodiversity First approach. Every element included should be considered in terms of its impacts on both climate and biodiversity.
- Addressing climate breakdown and biodiversity loss needs to underpin every single part of the plan. We suggest developing a set of criteria or questions to measure every element of the proposed plan against, for example:
  - Is this element of the plan in line with our goals to combat climate breakdown?
  - How can it be improved or changed to help further with climate breakdown mitigation or adaptation?
  - Is this element of the plan in line with our goals to combat biodiversity loss? etc.
- We suggest that the plan changes the wording throughout from “Climate Change” to “Climate Breakdown” or “Climate Emergency” to accurately reflect the situation as acknowledged by scientists.
- This Plan has an opportunity to greatly influence greenhouse gas emissions, for example, whether:
  - Carbon remains locked up in bogs
  - Bogs can be rewetted to enhance carbon sequestration
  - Carbon remains locked up in wetlands
  - Carbon remains locked up in hedgerows and trees
  - Buildings are sufficiently insulated
  - Buildings are self-sufficient in energy terms from renewable energy
  - Enabling a modal shift to sustainable modes of transport
- Air Quality is an increasingly important and concerning issue, that does not seem to feature throughout the Issues Paper.
  - KCC to increase the number of air quality meters present in the county.
  - KCC should support and provide funding for readout monitors in busy town centres, in order to make the issue of air quality forefront in people’s minds.
- Liaise with professionals in Maynooth University to support undergraduate and postgraduate projects relevant to climate change and biodiversity at the local level.
- Through Green Procurement, KCC can influence suppliers and stakeholders to improve their sustainability credentials.
- Set KCC planning policy so that carbon polluters need to pay for their emissions.
- KCC divest funds from polluting activities or discourage in any way they can polluting activities-avoid stocks in fossil fuels or banks that invest in fossil fuels.
- KCC to create a master plan of reducing emissions by sector and by Municipal District.
- Progress a green energy/circular economy hub and centre of excellence in circular research and practices.

### *How can the plan support our transition to a low carbon climate resilient and environmentally sustainable economy?*

- Improved public transport. By delivering change in modes of transport rather than just aspiring to it.
- Encourage local provision of requirements to facilitate business start-ups. Encourage the set-up of ‘not for profit’ businesses – like Community Supported Agriculture where the people involved get a living wage. Encourage these by reducing costs, rates and other barriers to set up.
- By providing grants to businesses that are willing to set up sustainable businesses – e.g., shared car schemes.
- By identifying the industrial and housing sectors where our carbon emissions come from within the County. Target the highest emission areas first. Empower communities to become involved.

- In other words, expand focus in relation to energy and reducing emissions to the whole built environment in the county and not just the Council's own housing stock and buildings, which is a very small percentage of the built environment in the county. Focus on Scope 3 Emission Impacts and how KCC can enable stakeholders to support them in reducing these emissions.
- Tying targets back to commitments made in other plan, for example, the commitment to reduce CO<sub>2</sub> and other greenhouse gas emissions in the county by 40% by 2030 per the *Kildare County Council Climate Change Adaptation Strategy (2019 – 2024)*.
- Tidy towns and similar groups should be better funded as they are vital in the war against litter. It is vital the council gets tough on litter and dog poo in local parks and the council needs to both educate and encourage other groups to educate that litter, anti-social behaviour and dog poo are anti-social activities.
- Cut out waste in refurbishing council housing, recycle, reuse initiatives.
- All new businesses must have some form of bike parking
- KCC to introduce a sustainability competition for estates/towns.
- KCC to ensure sustainability is a major factor for all funding applications.
- KCC to produce a list of sustainable practices to be implemented in homes and businesses and link the progress to local property tax/commercial rates.
- KCC to ensure measurable targets for GHG emissions are included.
- KCC to implement a school streets policy which has been shown to improve air quality as well as safety in the vicinity of schools.

### ***How can the Plan achieve a balance between the growth of the County and the protection of the environment?***

- We suggest that this be rephased to “How can we achieve environmentally sustainable growth in the County.” Growth without protection of our environment is regression.
- By promoting coordinated spatial planning to conserve and enhance the biodiversity of our habitats and species.
- By identifying and protecting green Infrastructure in the region and promoting the sustainable management of strategic natural assets such as our wetlands, peatlands, uplands, woodlands, and farmlands in an integrated and coherent manner.
- Employ experts on biodiversity and planning to inform the policies and plan.
- By protecting those parts of our environment that are most useful as carbon sinks and habitats for biodiversity.
- At a minimum, the provisions of the County Development Plan (Section 17 of the current CDP) on development management standards should be provided to every homeowner on purchase. This should be in an easy to digest format, clearly outlining the obligations on the developer, the local authority's remit in overseeing the development and the timelines involved in taking the estate in charge. In the event that an owners' management company (OMC) is a condition of planning, the local authority should clearly outline to new homeowners what part of the estate is to be taken in charge, if any, and what timelines are involved. The developer should provide a plain English document which outlines the respective responsibilities and obligations of the developer, the local authority and the member, based on the provisions of MUDs Act, with clear steps outlined on how new members join the board of the OMC.
- As part of building strong, resilient and self-sustaining communities, it is proposed that €100 is ring-fenced in a fund for community development in the new estate. This fund should be collected from the developer by the local authority and administered on behalf of the community by the local authority. The process will involve a resident's association which is set up, based on clearly established guidelines and a template constitution issued by the local authority
- Bogs are of utmost importance – the first aim for all bogs in the county should be to rehabilitate those suitable for rehabilitation.

- Other uses for bogs should only be considered where it has been established conclusively by experts that this alternative use will give better results for our climate and biodiversity goals.
- Lack of dark spaces due to development is affecting biodiversity. Investigate use of energy efficient lighting that is suitable for nocturnal creatures.
- Some public buildings are lit up all night. Change these to be motion sensor lighting.
- Investigate if motion sensor lighting could also be done for lighting on motorways.
- Support air quality monitoring and reporting throughout the county.
- The Council must plan for infrastructure which will enable increased cycling and walking to reduce environmental degradation from private cars.

### ***How can the Plan address flood risk and build resilience to better cope with the increasing frequency of extreme weather events?***

- Planning developments should take into consideration flood plains and impacts of future increased rainfall and extreme weather events.
- Flooding management approaches should take a nature first approach.
- Sustainable Urban Drainage Systems and permeable surfaces should be considered.
- Experts including hydrologists, geologists, engineers, builders and planners should form interdisciplinary teams to address these issues in the county.
- An assessment should be conducted throughout the county to:
  - identify areas most at risk and
  - best international practice identified to address any problems.

### ***How can the Plan increase the levels of renewable energy production and energy efficiency in the county while protecting the environment, the landscape and public amenity?***

- Developments for wind and solar farms on peatlands should include conditions that ensure the carbon sequestration and biodiversity value of the peatlands are maintained and enhanced.
- A windfarm strategy for the county should be completed as soon as possible.
- Local communities should play a key role in the development of renewable energy throughout the county.
- Interdisciplinary teams including experts in renewable energy production and energy efficiency along with ecologists, botanists, entomologists, hydrologists, geologists, engineers, builders, and planners should be formed to address this issue in the holistic manner necessary.

### ***What methods should be encouraged to maximise renewable energy provision for commercial developments and individual homes?***

- Planning development should include conditions to utilise roof space for solar panels.
- Developments should be looked at in a holistic manner to identify opportunities to develop renewable energy provision through solar, wind, or district heating.
- Housing developments should be built to the highest standards.
- Local, community renewable energy projects should be encouraged and enabled by KCC.
- Interdisciplinary teams including experts in renewable energy production and energy efficiency along with ecologists, botanists, entomologists, hydrologists, geologists, engineers, builders, and planners should be formed to address this issue in the holistic manner necessary.

### ***What are the main environmental issues that currently face the county?***

- Within the context of the Climate and Biodiversity crises, there are several environmental issues facing the county including:
  - Risk to species
  - Pollution of our waterways
  - Depletion of our water resources

- Depletion of our soils
- Depletion of our peatlands
- Plastic pollution
- Air pollution
- Noise pollution
- Light pollution

***What measures can be introduced to protect and safeguard the water quality of our rivers and groundwater?***

- Stemming the flow of contaminants including litter, pesticides and other run off.
- Leveraging nature-based solutions such as reed beds to protect water quality.
- Create water harvesting infrastructure.
- Enforcing the correct protection of water courses on agricultural land.
- Enforcing the correct use of discharge licenses from commercial buildings.
- Enforcing the correct use and maintenance of septic tanks.
- Increasing water quality testing around the county, both in terms of increased locations and increased frequency.
- All new urban estates must have sustainable urban drainage systems. Sustainable urban drainage systems must be incorporated into current town areas as much as possible.
- Ponds and Reed beds beside motorways for run off.
- Biological treatment treat system run off water.
- All new urban estates to include water harvesting infrastructure, communal reservoirs under green areas in all new builds (residential and commercial) and sustainable urban drainage systems.
- Creating interdisciplinary teams including experts in hydrology, ichthyology, ecology, botany, entomology, engineering, building and planning, to address this issue.

***Are there adequate recycling facilities in the county and if not, where should they be located?***

- Reducing waste at source should take precedence over recycling. Promote the top tiers of the waste hierarchy triangle which are **reduce** and **reuse** (instead of recycling, which has led to the increased proliferation of plastic waste)
- The CDP should take into account a Circular Economy approach and support the development of circular economy solutions throughout the county.
- Pursue the elimination of single use plastics in the environment through KCC procurement.
- Actively promote relationship with town/village community organisations, e.g., GAA, Boy scouts, Girl Guides and other community groups for annual advertised collections of electrical, metal waste etc.
- Areas that need to be provided for are apartment buildings to allow separation of waste.
- Provide more public segregated bins with awareness campaigns.
- Increased recycling facilities are needed for metals, electrical items, batteries.
- Create a closed loop plan to collect organic waste throughout the county, including leaves, which can be used as compost by the Parks Department or by local community gardens.
- Provide communal areas for leaf composting, supported by awareness campaigns of the right way to collect leaves.
- KCC to support the creation of climate action hubs in the county to include sharing libraries, re-use of household 'waste' items, scrap store, zero waste shopping etc, markets etc.
- Incentivize the collection and proper sorting of waste.
- Provide Deposit Return Scheme Machines in strategic locations.
- Launch and roll out Reuse campaigns across the County. Encourage the purchase of drinks (and food), from soft drinks to beer on draught, in re-usable containers people can bring themselves.
- Support the establishment of formal Library of Things and Repair Cafes.

- Facilitate local shops and enterprises coming together to collaborate to minimise waste and form joint solutions for waste disposal.
- Provision should be made in all parks and certain outdoor spaces for public water fountains or water refill point so that users can refill their bottles when doing exercise .

***Should we encourage greater use of green roofs, green streets or other green infrastructure approaches (e.g. tree planting) in new or existing development to provide solutions in relation to water management and the need to adapt to the predicted impacts of climate change?***

- Green and Biophilic Design should be encouraged among all new developments.
- At a minimum, developers should be required to retain and protect all existing hedgerows (and all trees if possible) and to incorporate existing hedgerows into planning design.
- Green roof technologies should be explored for mitigation of water run-off, along with their insulation effects, enhancement of biodiversity and ability to blend into the landscape (see Organic Centre, Rosinver)
- Of course, greening of streets is absolutely welcomed, however, the council needs to be cognizant of the fact:
  - that increased leaf fall will require drains to be cleared more frequently and
  - any such trees planted will need management plans
- Green infrastructure should also be considered in it's role in shading and cooling, as we prepare for growing temperatures in Ireland.

***What measures or strategies can be included in the Plan to support the protection and enhancement of our environment in our daily lives?***

- All measures and strategies included in the Plan should be assessed for their environmental impact. Only those with positive impacts should be pursued.
- Clear metrics should be identified to measure how KCC protects and enhances the environment.
- Decisions made by KCC should clearly outline how environmental considerations have been assessed.
- KCC need to lead by example and use their influence to ensure other stakeholders such as developers, businesses and others are driving positive environmental impact.
- The Plan should aim to go beyond legislative and regulatory requirements. KCC should aim to be a Local Authority Climate Action and Biodiversity Leader.

***How can the Plan support sustainable energy communities in County Kildare?***

Dedicated Energy Agency for Co Kildare

- We recommend the setting up of a Kildare Energy Agency, formally sponsored by KCC. An Energy Agency of this kind would support the energy transition for the county. We think that Ireland will increasingly need to look at the energy transition and build capacity on a county by county basis. Kildare with a population in excess of 222,000 could certainly provide sufficient work to make this a very worthwhile project.
- A dedicated energy agency would provide consolidated access to the systems, processes & services required to coordinate and drive the required decarbonization of Kildare's public & private energy systems over the next 30 years.
- Kildare Energy Agency would be a key enabler of the work required to contribute to the implementation the national policies around energy use set out in the Climate Action Plans (32% reduction in emissions by year 2030 (EU) & 70% electricity from renewable sources by 2030 ) & begin the widespread journey towards a low carbon society & economy.
- For example, currently 97% of domestic properties in Ireland use fossil fuels for heat - this includes 60% of the properties that were built before 2018. Irish homes are 60% more carbon intensive

than the average EU home. This is because they tend to be larger per person, have poor insulation & the owners make poor fuel choices.

- In order to meet our targets 500,000 homes countrywide will need renovation in order to minimize their carbon impact- this includes the installation of 600,000 heat pumps, & public & private EV charge points to support the EV targets.
- An Energy Agency would also engage in all activities that would allow communities in the county to move towards the development and everyday use of renewable energy sources so as to have security of energy supply and reduced carbon emissions.
- Kildare Energy Agency would provide a “One stop shop” for all energy efficiency and sustainable energy generation projects in Co. Kildare. It would provide advice, access to grants & financial support via the SEAI, other Irish and European agencies, contractor development & deployment, project management & help in sourcing low-cost finance.
- Kildare Energy Agency would also support KCC in the following areas:
  - Strategic Advice and Support – focussing on longer-term community development, education, implementing relevant policies & identifying strategic funding for energy projects.
  - Conducting accredited energy audits to the required standard, feasibility studies, and business cases for retrofits & renewable energy projects that develop
  - Project Management of efficiency projects (M&A) & upgrades.
  - Training, and Outreach to Communities – provision of training and seminars to encourage KCC staff and the general community to embrace energy efficiency and to progress energy efficiency & REN projects.
  - Energy Efficiency Projects and Energy Generation Projects – carry out specific aspects of energy efficiency and energy generation projects including analysis and post project evaluation.
  - Consolidation of output of Energy Master Plans for towns and villages in Kildare under the SEAI Sustainable Energy Community (SEC Network).

#### Emissions Targets

- We ask that the new CDP “locks in” targets for Kildare County Council’s Scope 3 emissions. These targets could be delivered by KCC in partnership with Sustainable Energy Communities supported by a dedicated local energy agency. These targets should be ambitious, adequately resourced and regular updates on progress should be publicly available.

#### Community Owned Renewable Electricity Generation

- The new County Development Plan should compel Grid Networks Ireland to ring-fence some grid connection capacity for communities in Co. Kildare. Protecting grid capacity in this way will give local communities breathing space to develop their renewable energy (RE) projects under the Renewable Energy Support Scheme. The revenue generated from these RE projects can be used to support other community projects. This will help build a more resilient and sustainable Kildare.
- The new County Development Plan should provide public land where possible for community-owned RE projects. This has already happened in Co. Mayo and is in progress in several other counties e.g. Co. Leitrim, Co. Westmeath and Co. Limerick.
- The new County Development Plan should insist that every private/developer RE project in County Kildare should have a proportion of the project in community ownership i.e., for every ten turbines a developer is applying for, one or two of the turbines should be community owned. This will bring much more significant benefits to the local community and to Kildare than just giving them the money mandated by the Community Benefit element of the Renewable Electricity Support Scheme. Even if the Community Project has to lease the site and pay for the RE project itself, it would still be a huge benefit if it could piggy-back on the grid and planning applications for the private development.

### Data Centres

- The Development Plan should set a cap on the number of data centres to be built in Co. Kildare for the life of the plan. Each data centre will employ relatively few people while being a major consumer of electricity.
- Any new data centres must be district heating supply-enabled (like Amazon data centre in SD which will heat SDCC building, library, Rua Red Arts centre, Civic theatre and with the heat from Amazon servers that would be otherwise wasted, Heatworks) and must supply their own renewable energy and the number of data centres in Kildare must be limited.

### Additional Suggestions

- Install district heating (common in Europe where waste heat from local industry, power stations or incinerators is used to heat other premises) for new cultural quarter planned for Bórd na Mona old headquarters and in other suitable places across the county.
- All new urban estates to be district heating enabled to ensure a rapid transition from gas.
- Solar PV, EV chargers, water harvesting infrastructure, communal reservoirs under green areas in all new builds (residential and commercial) and urban drainage systems.
- When considering planning applications, critical analysis of the impact of biomass fuelled power station should be conducted. Consideration on the efficiency of using biomass, as well as the dependency on imports of raw material should all be assessed against the county's climate ambitions.
- Finance project managers to work with sustainable energy communities - build a knowledge base in the county and support SECs to create their own power eg by providing land for Kildare SECs because we have the grid infrastructure in Kildare to sell back to the grid but we're low on land.
- Identify sites close to towns to facilitate community energy projects. See: <https://communitypower.ie/community-power-success-new-support-for-community-owned-renewables-puts-power-in-the-peoples-hands/>
- Create a KCC owned solar farm. (e.g., Kilwinning in UK)
- Leverage the role of KCC to encourage solar panels be installed on every feasible shed in the county.
- Future fit new park and rides with solar roofs.
- All new rural houses to have heat pumps.
- Set local planning policy to demand better of developers...ie solar roofs/green roofs, EV infrastructure:
- Hugely reduce energy demand from buildings including heritage assets by insulating and retrofitting all KCC office and housing stock. Potential for some group scheme retrofits in older estates in Naas (air quality poor, fires burning)
- Buy only 100% renewable energy and replace all lighting with LEDs.
- Support local residents with better guidance on retrofitting listed buildings via work of the conservation team.
- Raise awareness of and interest in domestic retrofit among householders in their area.
- Lighting - all public buildings, schools, medical centres are all lit up brightly at night. If they need lighting for security can we have a requirement that all public buildings have to install motion sensor lighting, and turn off the always-on lights.
- Remove local bylaws which prevent community markets (local food means less miles travelled)
- Planning guidance for the development of large-scale ground mounted solar PV systems
- Dedicated car free days in towns and villages.

## 2.4 Sustainable Mobility: Movement and Transport

### *What should be done to encourage people to walk, cycle or use public transport more?*

- Enable rather than promote active travel.
- Multi-disciplined teams are required which include engineers to ensure that redesigns include walking AND cycling, with even investment throughout the county.

### Walking and Cycling

- Install safe cycling routes to schools and town centres.
- Safe secure bike parking facilities at public transport sites (for example, there is none provided at Kilcock Railway station) and in the towns.
- Increase permeability through housing estates for pedestrians and bicycles. Many towns have housing estates adjacent to each other but are not connected. Creating permeability would create safe, direct and faster access to town centres and other amenities.
- The challenge is to attract people to active modes of travel for short journeys of less 5km by the provision of high-quality walking and cycling infrastructure, in contrast to the many low-quality ones provided to date. Now, with the appearance of E-bikes, the distances cycled by people are being increased but infrastructure is a prerequisite to greater use.
- Develop a Strategic Cycling Plan with local targets and annual monitoring and reporting.
- Emphasis that its policy is to reduce car dependency on the grounds of health, environment, and sustainability.
- Design healthy streets to enable and prioritise more active travel in accordance with the *Design Manual for Urban Roads and Streets* rather than just ticking the box of active travel.
- Improve conditions for pedestrians with higher development standards i.e., greater effective width of paths. The current standard of a 2m wide path is effectively reduced by road furniture, especially by road signage and traffic light poles. The standards of paths for new developments should be defined in terms of effective width, and paths should be continuous across minor junctions as is common practice abroad.
- Shared paths are acceptable in areas with low volumes of people both now and in the future, but should be the last option for pedestrians and cyclists on main roads. Where they are used, the designers should estimate the number of pedestrians and cyclists both currently and in 20 years' time to ensure that they are future-proofed.
- Shared space is seemingly a favoured option – not least because it does not involve any impact on traffic. However, the disabled and many cyclists have serious concerns about it. Shared space can work where there is reduction in traffic volumes to less than 2000 vehicles per day but are inappropriate at the level of traffic currently found in many Kildare towns and villages.
- Kildare County Council must identify dedicated cycle networks or alternative ways of enabling cycling in Kilcullen, Rathangan, Monasterevin and Castledermot, all of which are omitted from the Greater Dublin Area Cycle Network Plan (2013)
- Where shared paths are provided, the Council must consider that they have a tactile line in the centre for the vision impaired to separate the area for pedestrians from cyclists
- Create all new bridges with wide footpaths, bridges too narrow eg bridge over motorway at Sunnyhill and over motorway at Baroda Stud, Rosetown.
- Double storey cycle parking.
- Cargo bike parking.
- Safe streets at schools throughout the county eg St Francis school is Dublin's first school zone designed to encourage vehicles to slow down, discourage drop off and pick up, to reduce congestion and to increase safety at the school gate.
- Council to put up signage showing the 1.5 metre passing margin for cyclists - there is government funding for this and many Councils are already doing this.

- Council to promote safe cycling, to educate all road users that the road is a shared space, and teach people to respect cyclists as happens in other countries. There is a prevailing issue in this country in the behaviour and attitude of certain road users towards cyclists who are vulnerable road users. To encourage cycling as a healthy, safe pastime and environmentally sustainable mode of transport there needs to be a Council lead targeted road safety and respect campaign.
- Allow cyclists to turn left on red light - as is allowed in many other countries e.g Denmark (except of course it is for right turns in Denmark).
- Change traffic lights automatic sensors to be able to detect cyclists - most currently only can detect cars.

#### Public Transport

- Where schools are located on the periphery of towns, provide shared bus facilities from town centres to reduce single car usage.
- Public transport needs to be encouraged; anti-social behaviour needs to be discouraged strongly.

#### Park and Ride

- Install park and ride facilities adjacent to public transport.
- Local park and ride parks need to be enlarged along with public transport organised so their destination will be the car parks that serve commuters, especially in the morning. There needs to be more joined up thinking when getting commuters to their place of work such as Dublin.

#### Cars

- Car owners need to be encouraged to park in car parks rather than outside a shop, there needs to be more car free streets.
- Slow down the traffic on the streets in towns to make them safer. Street furniture/ chicanes.
- Reduce the default speed limit in urban areas in the interests of the safety of vulnerable road users.
- The Council must ensure that universal access is available at all car parks and other amenities areas. Barriers/ poles can prevent the access of wheelchair users and their vehicles.
- Create traffic management systems to slow traffic down (speed ramps / speed cameras).
- Limit the volume of HGVs that are permitted to drive through small villages.
- Incentivise carpooling or car clubs.
- Further expand the network of GoCars.

#### *How can we reduce the need to travel and/or travel more sustainably beyond Co. Kildare, for example, for work, retail or recreation purposes?*

- Kildare must future proof new transport developments and ensure that they are compatible with other Council policies in particular with climate change policies. Mitigating climate change implies an overall reduction in travel by private car, but TII standards, which local authorities follow for non-national roads, requires that current traffic is modelled in the current year and for twenty years' time, assuming a 1% increase in traffic per year.

#### *Is new or improved transport infrastructure required in the County and, if so, where?*

- Kildare is well catered for in terms of national roads and the government has announced plans to invest heavily in rail.
- Cycling infrastructure has been neglected by governments for the last 70 years. The new Programme for Government includes a commitment to a high level of investment. Unless the Council commits to spending what is on offer on high quality infrastructure, the funding will be spent without a sizeable increase in cycling.
- Standards for new development should consider micro mobility, for example, E-bike parking requirements, E-scooter cargo bikes and the re-allocation of road space.

- If new schools must be located on the outskirts of towns, such as has happened in Maynooth, then thought needs to be put into planning how to remove the associated car transport, whether that is through:
  - provision of safe cycling route for students or
  - communal buses from more central town locations.
- Provision should be made for cross county public transport to high density job locations, such as Intel in Leixlip. This could be planned and facilitated through surveys of employees in these high-density job locations.
- Investment in better facilities for towns such as Athy, Naas (Sallins), Celbridge (Hazelhatch), Newbridge and Kildare, together with the extension of the DART from Maynooth to serve Kilcock would yield a significant return on investment in terms of combating the impact of climate change. A wonderful opportunity to reduce traffic congestion and CO<sub>2</sub> emissions will be missed by not extending the DART to serve the town of Kilcock (particularly when the service will run to overnight storage sheds for security purposes at a planned location between Maynooth and Kilcock).
- Provide, as a matter of priority, park and ride facilities as an incentive for commuters to travel by public transport, along the lines of those operated in the cities of Oxford and Cambridge. Persons park their motor vehicles at these facilities on the outskirts of the city and take a shuttle bus to the city itself.
- The Council must support the engagement and progression of the Rail Transport 2020 Route projects, in particular the extension of the electrified line from Hazel-Hatch to Kildare town. We cannot continue widening and creating more motorways.
- Provision of a light rail line from Sallins to Naas.

#### ***How should we manage private car access and parking in our towns while at the same time making our towns vibrant places?***

- On the Continent, many historic towns and villages do not allow cars in their historic centres and instead parking is located at the edge of the small town/village. The Council should do likewise.
- On the grounds of safety, Kildare should eliminate rat running by using filtered permeability to reduce the risk of collisions in residential areas.
- Traffic Management Plans should be designed to force traffic to keep to the “main roads”. Active travel should be prioritised on short direct routes, with traffic diverted along longer indirect travel as is the practice in Ghent, Groningen, Houten etc.
- Examine the feasibility, suitability, and acceptability of creating a cycle town for Maynooth in association with Maynooth University along the lines of the facilities available in the University Cities of Oxford and Cambridge. This would entail the university being agreeable to the construction of cycle pathways which would traverse through the university complex that could be used by both students/staff and non-students alike.
- Support provision for cycling within the county towns, possibly within the context of the availability of park and ride facilities, but this would be conditional on adequate infrastructure such as provision of lock-up facilities for bicycles, provision of appropriate anti-theft measures in association with An Garda Síochána.
- The cost of parking in our town centres should be high to discourage all day parking. The need for parking will reduce if we reduce car dependency.
- The Council should divert HGVs away from towns, except for local deliveries.

#### ***How can rural living be more sustainable and rural isolation reduced with greater accessibility?***

- Rural isolation is generally experienced by our elderly people who have lost community members. Supports should be in place for these people to connect with other elderly people, for example:
  - through provision of transport to weekly get togethers in community centres
  - through community meals on wheels

### ***How can we create successful streets that easily facilitate the needs of cyclists, pedestrians and vehicles, in our towns and residential areas?***

- Significantly increase the number of crossings (controlled and uncontrolled) for pedestrians and cyclists in towns and villages. For example, on the continent there is often four zebra crossings at a crossroads.
- Restrict motorised traffic as is being done in Dun Laoghaire, Dublin City as well as Paris, Helsinki etc.
- Provide high quality protected cycling facilities that enables Cycling for All.
- Implement ambitious school streets and school zones, if it is to benefit from the government's proposed *Safe Route to Schools* programme.
- Currently, the phases of many traffic lights are controlled by the volume of traffic. Instead, outside the morning and evening peak times, the Council must prioritise active travel by switching control to fixed times.
- Provide more outdoor seating in our streetscapes, recreation, and outdoor areas.
- Surface cycle tracks with red wearing course in the interests of road safety and road legibility.

### ***How best can we co-ordinate and integrate transport and land use planning in order to reduce the demand for travel and dependence on private car transport?***

- By having a willingness and time-bound plan to effect change
- By giving thought to the placement of new housing developments, schools, and factories.
- Through a systematic survey of private car transport pressure points in the county to determine where resources and planning can be directed immediately
- Create a bus/transport interchange in Naas at the depot at KCC yard beside Hedderman's car park. This can deal with local, county and Irish Rail feeder buses and can be designed to offer environmentally friendly effective and efficient sustainable transport options.

### ***Do we need more Electric Vehicle (EV) charge points in our towns/villages? If so, where?***

- The Development Plan should set ambitious targets for roll-out of public EV charging across Kildare.
- There are very few EV charge points in towns and villages, so more will need to be provided at minimum in all towns. However, electric cars are not a silver bullet to address the challenge of sustainability, the health crisis or congestion. Furthermore, although Ireland is generating more power from renewables, a significant portion is still generated from fossil fuels.
- EV charging points requests needs to be added to planning permissions as a condition before permission is given for all houses, apartment schemes and commercial enterprises.
- EV charge Points should be located in strategic settings, based on journey data.
- Charging units should not be located on footpaths or cycle tracks. The space should be relocated from road space and/or car parking spaces.

### ***Where are the most suitable locations for Park and Ride or Park and Stride facilities?***

- Park and Stride facilities for children going to and from school should be located a reasonable distance from schools in order to reduce the risk to children of a collision with a motorised vehicle.
- Near Church car parks or supermarkets would be suitable which would simultaneously give the parent/guardian the opportunity to shop locally.
- The DART is coming so Park and Rides and sustainable local link buses should be planned in advance.
- Near public transport to encourage train and bus use.

*How can we promote best use of Transport Infrastructure, existing and planned, and promote sustainable and active modes of travel?*

- We need better enforcement to ensure that footpaths and cycle tracks are not used as car parks.
- Naas and Maynooth will benefit from their designation as key towns. Consequently, KCC must require higher standards for the level of bike parking especially at new schools compared to elsewhere in the county.
- KCC must ensure that there are direct accessible public transport links and high-quality cycle infrastructure between rail stations and surrounding towns

## 2.5 Creative Places: Social, Community and Cultural Development

### ***Are there adequate community facilities in our towns and villages throughout the County? If not, where are the deficiencies/gaps?***

- Conduct an accessibility audit throughout the County. This would include dishing and ramps to roads, footpaths, pedestrian, and pelican/zebra crossings, access to graveyards, heritage sites, public parks, and buildings.
- Use and include KCC's Access Strategy vision for a society in which disabled people can work and to live a full life with family and as part of their community.
- Surveys are required to check community halls and ensure such meeting places are available both in towns and villages within the county.
- Include, childcare, shops, and pubs with new estate permissions along with other social requirements such as halls.

### ***What policies should be included in the Plan to support and enhance childcare and retirement living options in the transition to nursing home provision throughout the County?***

N/A

### ***How can the Plan promote social inclusion and equality for all our citizens?***

- Promote environmentally sustainable jobs which provide our young people with decent livelihoods, where they will have the time to contribute to their communities.
- Foster jobs and livelihoods in our county, where wealth is distributed equitably in the community.
- Establish consultation processes that seek to hear from diverse voices and understand specific challenges and needs.
- Support the development of community supports to assist new citizens in understanding:
  - their rights and responsibilities
  - how they can interact with their community
  - have a say in local community and county wide matters
- Through promoting more knowledge of contact between and respect for diverse groups.
- The need to promote the highest levels of universal accessibility in all new and existing community facilities.
- The need to ensure that services and facilities are physically integrated with residential and employment areas, clustered to optimise accessibility and usage.
- To ensure language and terminology used is inclusive and respectful to all.
- To ensure grants and investments are shared equally across the county.
- To create safe, welcoming spaces for communities to gather.
- To ensure issues raised by citizens are taken, and responded to, with sincerity. Including consultations.

### ***Are the current standards for public open space provision associated with new developments appropriate?***

- Make sure open spaces for residential use is adhered and fully maintained.
- Ensure permeability throughout open spaces.
- Ensure teenager requirements are added to the plan such as skate parks, playing fields and areas set aside for them to socialise in.
- Increase grants which involve youth.
- Grants for existing community facilities need to be increased, such as mc Auley place.

***What policies and objectives need to be put in place to ensure recreational and community resources meet the demand of Kildare's growing population, while protecting existing resources from inappropriate development?***

- Expert guidance needed on an increased number of well planned, easily accessible walking and cycling routes that consider:
  - the sensitivity of the local environment
  - the interconnectivity of recreational resources in towns and villages with housing developments
- Education for existing inhabitants and new inhabitants, to cover:
  - information about habitats in their area, and their responsibilities for them
  - information about active transport.

***How can the value of existing community facilities be maximised?***

- We would like to see measures in the CDP for empowerment of communities.
- Strategies to increase community interaction, engagement and self-efficacy

## 2.6 Enhanced Amenity and Heritage: Landscape and Green Infrastructure

### *How can we promote co-ordinated spatial planning to conserve and enhance the biodiversity of our protected habitats and species including landscape and heritage protection?*

It is of particular relevance here that in the Introduction Section of the *Kildare County Development Plan - Issues paper* (2021), no reference is made to biodiversity loss. This is surely a critical oversight by KCC and perhaps points to a lack of awareness of the severity of the crises. We argue that the consequences of biodiversity loss far exceed those of the impacts of Brexit and even of the Covid-19 pandemic. A growing body of scientific research points to the fact that further pandemics are inevitable given the global extent of biodiversity loss and climate change. It is incumbent on all of us to reflect these issues ourselves on how we are intrinsically interconnected with the natural world.

Objective 2 of the *County Kildare Biodiversity Plan* (2009-2014) states that KCC will: “Develop and maintain a dedicated heritage website for the county to be part of Kildare County Council’s website. This web site will be linked to other relevant websites”. and additionally, states that the County Council will: “Develop and promote a Kildare biodiversity website”. In accessing the Councils Biodiversity and Natural Heritage main web page (Feb 2021), one is brought to a range of headings, with a number of headings not containing active links. It is immediately evident that the overwhelming body of publications cover pollinators (see Appendix A)

Additionally, when accessing the KCC’s central publications page (Feb 2021) there is no link to the *County Kildare Biodiversity Plan* or any of the publications on natural heritage.

There were many good recommendations in the previous Kildare biodiversity plan.

- Were the actions numbered 1 to 8 under Objective 1 undertaken? And are the results publically available? e.g. Objective 1.21 Conduct a waterways corridor study for Kildare’s canals Was this undertaken? In Objective 2, Action 13: have we Kildare biodiversity website?
- One of the actions of the previous biodiversity plan for Kildare was a review of hedgerows. At least 3,000km cut back by local authorities since 2018 during the prohibited season between March and August, was Objective 3 Action 25 delivered, i.e. training provided in hedgerow management?
- Objective 4, update on actions 23 – 25 is needed.

KCC should give practical credibility to its declared Climate and Biodiversity Emergency (June 2019) by employing suitably qualified biodiversity staff to:

- expertly review planning applications and enforce planning requirements.
- practically achieve environmental education by developing a one-stop-shop on the Council’s website of easily accessible environmental information (compiled from previous publications). This will allow local Tidy Towns/interested groups and individuals to easily access correct scientific information on, for example, the following topic (not exclusive):
  - the ecological value of habitats such as:
    - roadside verges
    - hedgerows
    - canals, lakes, rivers
    - riparian vegetation
    - fens
    - bogs
    - marshes
    - marginal lands
    - meadows with local diversity etc.

- the importance of invertebrates (not just pollinators) and other species
  - the current state of our habitats and species
  - the importance of preserving the genetic integrity of our own native tree species
  - the importance of preserving the genetic integrity of our own native and local wildflower species and to discourage the planting of non-local, commercial 'wildflower' seed mixes
  - the importance of our geological heritage
  - ways to make our gardens more nature friendly (not just pollinator friendly) through planting
  - ways to make our houses/gardens more nature friendly e.g., by reducing biocides/pesticides
  - ways to divest our purchasing power from unsustainable purchases
  - ways to reduce wasteful consumption of water (not just in drought periods)
  - ways to reduce wasteful consumption of other resources
  - ways to recycle hazardous waste
- This information could then be easily copied and pasted into more local awareness campaigns in towns and villages by community volunteers (to empower and facilitate communities, to avoid well intentioned community organisations giving out inaccurate information, to increase efficiencies/ avoid having to reinvent the wheel.

#### Biodiversity Enhancement on Council Land

- Council managed estates and land (housing estates, parks, gardens, roadsides, roundabouts) provide a terrific opportunity for the Council to be exemplary in implementing biodiversity initiatives, for example:
  - Implementing the *All-Ireland Pollinator Plan* correctly under the guidance of expert staff
  - Banning pesticide/herbicide use
  - Creating and managing native wildflower meadows instead of mown grass areas
  - Creating small urban woodlands and copses
  - Sustainably and correctly managing native hedgerows and roadside verges
- We request that KCC make a written statement in the Development Plan to outline their policy and how they will achieve this.
- Recommendations from the *All-Ireland Pollinator Plan* should be incorporated into any Council managed lands and implemented correctly. There are a number of examples nationwide where many of the principles have been implemented highly successfully and at a negative cost input.
- Dun Laoghaire Rathdown have been to the forefront in banning pesticide/herbicide use, KCC should follow.
- Undertake an aerial assessment of each village and town in the county, to identify any land that is un-used, in order to see how biodiversity can be promoted in the area.
- Liaise with managers of open spaces with a focus on goals to which they can relate – e.g. creating shelter for playing pitch by planting belt of trees, schools – creating spaces for outdoor learning, health
- Plant all town planters /pots with herbaceous perennials that are pollinator friendly. Also consider planting herbs in some of these.
- Engage with community to see if it is possible to identify people who can propagate plants for use by tidy towns
- Consider buildings with eaves that might be suitable for swift boxes

- The advice of the ecologist is needed on the impact of street lighting at night on biodiversity, and, in addition, the impact of different types of lighting.

#### Biodiversity Enhancement on Private Land

- Developers must retain existing hedgerows and trees.
- Sustainability objectives should be central to any further development plans.
- With regards to housing developments, especially in high density apartment blocks, developers should be required to provide designated areas for general/recyclable/green waste sorting at a minimum.
- Hedgerows should not be cut as a matter of course at any time and builders should be sanctioned strongly if they pull them up. The power to stop should be strengthened.
- Set local planning policy to require developers to include:
  - green spaces; edible hedges, bramble, community orchards, wildflower meadows, mature trees to be retained, install community composting, community gardens, swift bricks and wild bee bricks in all new residential estates, with financial penalties for non-compliance.
- Set local planning policy to require developers to leave hedgerows and trees in place, and to provide evidence as to why they need to remove any natural vegetation, with financial penalties for non-compliance.
- Set local planning policy to require farmers and owners of hedgerows along waterways to maintain them in a fit state for the maintenance of biodiversity with financial penalties for non-compliance..
- Native trees to be planted at intervals along hedgerows. All boundaries and perimeters, including security fencing to have native hedgerow planted along it (hawthorn, apple, pear, plum, hazelnut). Bare stone walls could have ivy or honeysuckle,

#### Hedgerows

- A higher level of protection for existing hedgerows and trees should be given on all development sites as a priority. Protection of these features should be central and non-compliance should result in heavy enforcement fines.
- These old hedgerows (whether deemed of high, moderate or low conservation value) are key, not only to biodiversity (in terms of habitats and wildlife corridors), but also have many other ecosystem benefits such as carbon sequestration and flood mitigation.
- It is of little conservation/biodiversity/heritage value to require developers to plant trees in replacement of existing hedgerows. Especially when a maintenance plan is neither required or enforced.
- It should be a requirement of planning permission for developers to suitably restore existing hedgerows deemed as low conservation by employing local experts in hedge laying.
- Hedgerows - farmers and even waterway hedgerows (along canal) are cut much too far back, way lower than the limits required for biodiversity. We need penalties for where this happens. Hedgerows must be allowed to grow bigger and taller to support more wildlife.

#### Enforcement

- While strong considerations to hedgerows, woodlands and trees are made in the current CDP, (e.g. Section 4, 13.10, 17.2.6) there is growing concern that these conditions are not being enforced.

#### Trees

- We would like to see a published Tree Strategy for Kildare (see *Dublin City Tree Strategy 2016*<sup>5</sup>)

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<sup>5</sup> <https://www.dublincity.ie/dublin-city-development-plan-2016-2022/16-development-standards/163-landscaping/1633-trees>)

- Planting trees needs to be further encouraged especially native Irish species, it should be the policy of the council to plant at a minimum a tree where one is knocked and replant / plant new trees wherever possible. Residents should also be encouraged to plant trees in their gardens.
- In consultation with the National Biodiversity Centre, the EPA, Birdwatch, and other NGOs and relevant stakeholders, to undertake an inventory of all woodlands in the county. Following this, an ecological assessment and management plan for each site, to include conservation corridors connecting all pockets of remaining native woodland.

#### Pesticide and Herbicide Use

- Widen glyphosate ban across the county.

#### Wildflower Meadows

- Creating and managing native wildflower meadows instead of mown grass areas
- managed mowing of grass areas to encourage wildflower production.

#### Creating Small Urban Woodlands and Copses

- There are a number of existing areas in towns and villages in Kildare that would benefit from small woodland features. One example might be in the stepped back areas in housing estates adjacent to motor ways. Often these areas are simply grassed over with no attention. These copses would provide a range of benefits to the residents in these areas, such as filtration of noise and wind and a connection with biodiversity. Community involvement in the creation of these woodland areas, under the guidance of the Council's Parks Department could have many positive effects and would provide an excellent opportunity to engage and educate.

#### Peatlands

- Conservation of all peatlands in the county for their flood alleviation ability (they act as sponges), their water purification ability, their carbon sequestration ability.
- The IPCC Lodge bog has been described as Ireland's first peatland habitat best practice model for research, restoration and education resource, and could be used as a model of how to restore bog land.
- Bórd na Mona rail infrastructure on bogs could be upcycled and maintained as walking trails to witness nature's recovery in bog.
- Partnerships could be developed between Bórd na Mona, KCC, Birdwatch Ireland, IPCC, Butterfly Conservation.
- Development of conservation corridors connecting all pockets of remaining native woodland and peatland.
- In consultation with IPCC and other relevant stakeholders, to undertake an inventory of all peatlands in the county, and following this, an ecological assessment and management plan for each site
- Immediate ban on peat harvesting for horticulture.

#### Pollinators

- The All-Ireland Pollinator Plan has been a huge success nationally due the hard work and expertise of a relatively small number of individuals. These individuals have tailor made pollinator plans for various sectors in our society which can easily be applied at the local level.
- We absolutely welcome the various initiatives by KCC to make the general public aware of the plight of pollinators. However, understandably, some key messages of the pollinator plan are overlooked, as the general public are not experienced entomologists, botanists or ecologists, with specialist knowledge. Specifically:
  - Saving generalist garden bee species will not save our specialist bees.

- We find pollinators in various insect groups, not just bees. Often these insects have several stages in their lifecycles and are dependent on heterogeneous habitats (i.e., not just 'wildflowers').
- The perception that 'wildflowers' equals native species. We see this evident in the proliferation of 'wildflower' seed imported from Holland in the supermarket and horticultural trades, and the advice given by many horticultural and agricultural advisers to make areas 'pollinator friendly'.
- It is not just pollinating insects that are under threat but a whole host of organisms and habitats, including to mention a few organisms: many other invertebrates, fish, reptiles, mammals, along with various members of the plant kingdom and soil microbes.

#### Biodiversity Action Plans for Kildare Towns

- Ten towns in Kildare have had 5-year Biodiversity Action Plans drawn up for them by Green Pine Consultants funded by Leader and KCC.
- We would ask KCC to support Local Community Groups to implement the following consultants recommendations, as follows:
  - Conduct whole town reviews – using aerial maps plus photos to look at every area in the town, consider who owns / manages each area and plan to collaborate with them.
  - Separate into public / business spaces and residential (housing estates) and discuss what can be done in each area to promote biodiversity.
  - Look at the function of all spaces.
  - Consider all mown grass areas that are not being used as an amenity (sport etc) and liaise with owner/club/business/school to see if can be developed into meadow.
  - Look at boundaries and perimeters of all spaces, with the following in mind:
    - Security fencing could have native hedgerow planted along it – remove all Laurel
    - Bare walls could have ivy planted (important for birds, pollinators and other invertebrates)
    - Liaise with owner/manager – focus also on goals they can relate to – e.g. creating shelter for playing pitch by planting belt of trees, schools – creating spaces for outdoor learning, health spaces – improving well-being.
    - Habitat mapping when planning any projects.
    - Retention and enhancement of green spaces, and for green infrastructure in any new developments.
    - To consider buildings with eaves that might be suitable for swift boxes.
    - Rewilding where appropriate.
    - Lighting - all public buildings, schools, medical centres are all lit up brightly at night. Light pollution has a big effect on biodiversity. If they need lighting for security can we have a requirement that all public buildings have to install motion sensor lighting, and turn off the always on lights. Street lighting - a lot of the street lights are being replaced now with LED lights. These always seem to be a lot brighter. Can we organise for these to be of lowest power when they are installed and compliant with biodiversity enhancement?
    - Roll out of All Ireland Pollinator plan KCC has signed up to across the county.
    - Transform urban roundabouts into wildlife havens, Ennis tidy towns worked with MD staff to make 80% of the town's roundabouts pollinator friendly without supplementary planting. The beautiful wildflower meadows are simply a result of reducing mowing and removing cuttings each year to reduce soil fertility. To ensure public support, the edges of the roundabouts are cut short to make it clear that a purposeful form of management is taking place. Sculptures of bees and butterflies were erected to show the aim of these areas. This is a smart goal, specific, measurable, attainable, relevant and time-bound.

### Biodiversity and Heritage Action Plan

- Review and update the Biodiversity and Heritage Action Plan to give due consideration to the protection and enhancement of biodiversity (as stated in the National Biodiversity Action Plan 2017-2021), with:
  - key measurable targets
  - annual succinct reviews of the progress of this plan
  - plans and reports that are easily readable, without fancy graphics and redundant pictures
  - the financial cost of graphic design/production of such plans/reports to be clearly stated (to foster openness and transparency in where finances are being spent)

### Resources

- Kildare needs a full-time professional ecologist with a support team, and whose remit would include making a list of all endangered species in Kildare, and ensure that their habitats are such that they support their life-cycles.
- A national biodiversity emergency has been declared and it is vital therefore that Kildare's development plan fully recognizes this. Pressure on habitats is the leading cause of biodiversity loss, and the most recent habitat assessment in Ireland reported that that 85% of the habitats had unfavourable status, with almost half of habitats showing on-going decline. There has been no real improvement in habitats since the first assessment in 2007.

### *How do we achieve and maintain a balance between development pressure and protection of our built and natural heritage?*

- Foster agriculture and industry where Irish production does not contribute to:
  - Habitat destruction and depletion of resources
- Refuse planning permission for solar/wind farms and other developments which would contribute to the decline of:
  - Rare habitats, such as bogs, fens, marshes, damp meadows and other wetlands
  - Prime agricultural land

### *How should we protect and enhance Green Infrastructure and ecosystem services and promote the sustainable management of farmlands, peatlands, uplands, woodlands and wetlands?*

- By promoting the planting of native woodland schemes
- By promoting education in the planting of native woodland schemes
- By promoting education in the long-term management of native continuous cover forestry
- By supporting sustainable, locally produced food.
- Retain bogs suitable for rewetting in Kildare by:
  - Rapidly identifying such bogs
  - Educating the community of the value of this strategy
  - Proactively supporting the rewetting of these bogs as a matter of priority
  - Proactively supporting the community in investigating tourism opportunities
- Install and enforce a sufficient planning bond to deter developers from damaging or removing hedgerows, trees or other natural features. We see many examples of environmental damage in currently/recently developed sites on a daily basis. For example, hedges being removed, non-native laurel plants being used for landscaping.
- Provide spaces for community gardens and allotments where people can connect with community, nature and sunshine and fresh air and grow some of their own food locally.

- Promote the reduction of mown grass and the return of grassland with diverse local species in any areas within towns and villages that are not required for children to play, for example, roundabouts, vacant areas of housing estates, roadside verges.
- Identify, promote and support small woodland schemes in areas within towns and villages that are not required for children to play, for example, vacant areas of housing estates adjacent to motorways
- Remove herbicides and other pesticides in the management of Council spaces.
- Promote the reduction of herbicides and other pesticides in the management of amenity spaces by Tidy Towns, Residents Associations, businesses and individuals.
- Reduce further threats to bats and other nocturnal wildlife in our towns by installing appropriate street lighting.
- Refuse planning permission for solar/wind farms and other developments which would contribute to the decline of:
  - Rare habitats, such as bogs, fens, marshes, damp meadows and other wetlands
  - Prime agricultural land

***Are there any buildings or structures of special interest in your area that should be added to the Record of Protected Structures (RPS)?***

N/A

***How can the Plan encourage the reuse of Protected Structures that have fallen into disuse?***

- Explore their use as digital hubs, communal workspaces, provide financial incentives to restore etc.
- Grants could be a way of getting protected structures back into use that have become derelict, through the county council or through individual taxes.

***How can natural heritage and biodiversity be enhanced?***

- Employ more biodiversity and heritage staff with the requisite knowledge, to explore and advise on options.
- Provide for publicly accessible allotments and space for community growing projects in each MD.
- An education officer, either attached to the county council or another environmental group, is essential, their mission to improve the amenities of towns and villages for example to the lake area of Naas. They would visit the schools on a regular basis, keep tract of wildlife and educate.
- A greater knowledge of graveyards and their wildlife is required in towns and villages.

***How can greater access to the natural, built and archaeological heritage be facilitated, while having regard to the sensitive nature of many sites?***

- Explore other site examples, for example, Boora Bog in Offaly
- Expert guidance needed on an increased number of well planned, easily accessible walking and cycling routes that take into account:
  - the sensitivity of the local environment
  - the interconnectivity of recreational resources in towns and villages with housing developments
- Education for existing inhabitants and new inhabitants, to cover:
  - information about habitats in their area, and their responsibilities for them
  - information about active transport
- Employ more biodiversity and heritage staff with the requisite knowledge to explore and advise on options

*How can we enhance, integrate and protect our arts, culture and heritage assets to promote creative places and heritage led regeneration?*

- Promote the development of a coherent county-wide tourism strategy, capitalizing and integrating our geological and landscape heritage; habitats of European and National importance (SACs, SPAs, NHAs and pNHAs); built heritage and remaining areas raised bogs, fens, rivers and woodlands that traverse our county
- Support the biodiversity plans developed by Heritage office /Green Pine Consulting for ten towns in the county, and more to be developed this year.
- Greater protection for trees, requiring tree felling licences for the removal of mature, healthy trees in the community. In other words, valid reasons need to be given. This should be enforced and have large penalties for infringement.
- A higher level of protection for existing hedgerows and trees should be given on all development sites as a priority. Development design plans should incorporate these hedgerows and trees where possible. Protection of these features should be central and non-compliance should result in heavy enforcement fines.
- Correct management of hedgerow cutting
- Identify commons land throughout the county and provide access to it to communities
- Kildare Co. Co. to provide every town with space for allotments or community supported agriculture. Local sustainably produced food protects the global environment.
- Support for developments such as Umeras Peatlands Park where sustainable tourism can be created that also supports local biodiversity and wildlife habitats.

## 2.7 Making it happen: Infrastructure, Energy and Communications

### ***Are there infrastructural deficits which are inhibiting economic growth and development in the County?***

- There are many infrastructural deficits that inhibit our environmentally sustainable economic growth and development, for example on infrastructure relating to:
  - Sustainable travel
  - Sustainable energy provision
  - Broadband etc.
  - Look at per capital allocation of infrastructure
- Kilcock does not have the infrastructure (schools, retail, social, sport) to support the current population and all the new houses built over the last 2 years, never mind the planned expansion.
- Cross border Local Area Plan also required for Kilcock which actually spans two counties. The current CDP only mentions having a cross border plan with Co Meath for Maynooth.

### ***How can the Plan support the relevant external agencies in the provision of electricity, gas, water, wastewater, renewable energy, telecommunication and broadband infrastructure?***

N/A

### ***How can we conserve and enhance our water resources to ensure clean water supply, adequate wastewater treatment and greater resource efficiency to realise the benefits of the circular economy?***

A County Development Plan should be central to the protection, management and conservation of watercourses, lakes, reservoirs and groundwater. Inland Fisheries Ireland (IFI) reports that Ireland has over 70,000 kilometres of rivers and streams and 144,000 hectares of lakes. County Kildare hosts many rivers and streams, the main ones being The Liffey and Barrow along with many substantial tributaries. Kildare also hosts a portion of the Blessington Lakes and Golden Falls Reservoir, Grand and Royal Canals, along with critical wetlands, canal feeders, and nationally important aquifers such as the Curragh Aquifer.

There are many “Water” stakeholders in Ireland, all tasked with specific functions and a County Development Plan has the ability to pull all of their mandates together. The main public stakeholders are: Local Authorities, Irish Water, OPW, Waterways Ireland, EPA, ESB and IFI, who have various responsibilities aimed at pollution control, navigation, recreation and amenity, fisheries, protection, management, conservation, power supply and extraction. The battle between stakeholders to fulfil their own mandates is real and conflicts are a constant.

For example, IFI is mandated to ensure that the fisheries of the State are protected. To protect means to keep safe, defend, to shield from danger, injury or change. IFI stated in their submission to the National Planning Framework in 2017 that they are of the view that the NPF in considering the protection of the quality of the aquatic environment, must address not only water quality but also include the protection of the physical environment, hydrological processes and biodiversity.

The EU Water Framework Directive (WFD) (2000/60/EC) entered into force in December 2000 requires the protection of the ecological status of river catchments – this encompasses water quality and requires the conservation of habitats for ecological communities. One of the primary objectives of the Directive is to establish a framework which prevents further deterioration and protects and enhances the status of aquatic ecosystems. Protection of aquatic ecosystems requires that river systems be protected on a catchment basis.

The CDP must recognise that protection of the aquatic environment/habitat not only requires the

protection of water quality but also necessitates the protection and maintenance of physical habitat and hydrological processes/regimes.

The following script can be credited to Inland Fisheries Ireland in their deliberations on the National Planning Framework. The Climate Action Linkage Group would like to see these objectives built into Kildare's County Development Plan.

#### Water Quality and Municipal Sewage Treatment Infrastructure

Sufficient treatment capacity must be available both within the receiving sewerage systems locally and downstream of waste water treatment plants (WWTPs) over the full duration of the plan in order that the ecological integrity of the ultimate receiving waters is protected. The importance of building a comprehensive and robust assessment of both local infrastructural needs and Irish Water/Local Authority capacity to meet those needs into the plan cannot be understated. Should particular WWTPs fail to provide expected capacities during the life of the plan the risk of associated significant environmental impacts which may result from local development is significant. There are examples all along the rivers in Kildare where, over the years excessive discharges have been tolerated. The Liffey alone hosts three very significant large town discharges at Ballymore Eustace (which in the point of wastewater discharge for Blessington, County Wicklow), Osberstown (Upper Liffey) and Leixlip (Lower Liffey). The Liffey is expected to cater for a population equivalent of 300,000 (and that's not to mention the Water Treatment Plant extractions and discharges at Ballymore Eustace and Leixlip which account for a population equivalent of 2,000,000).

The Planning and Development Act 2000 requires that a CDP must *be consistent as far as possible with National Plans, Strategies and Policies which relate to proper planning and sustainable development*. The policy of granting planning permissions for developments with associated increased loading on inadequate or already overloaded municipal sewage treatment plants is clearly not a sustainable practice. Taking account of the adverse effects of increased wastewater discharges on the general wellbeing and quality of rivers, it must be considered that in areas where treatment facilities necessary for development do not exist, planning permissions should either be refused on the grounds that such development is premature, or the developer should be constrained by an appropriate condition requiring that connections to the sewer will not be permitted until sewage works upgrading is completed and operational.

#### Water Quality and Integrated Constructed Wetlands (ICWs)

The CDP must regulate the installation of systems intended to treat wastewaters and improve the quality of discharges to the environment. Wetland systems should satisfy the criteria detailed in the November 2010 publication "*Department of the Environment, Heritage and Local Government, Integrated Constructed Wetlands, Guidance Document for Farmyard Soiled Water and Domestic Wastewater Applications*".

Integrated Constructed Wetlands (ICWs) must be viewed as an adjunct to good agricultural practice and not as a low-cost way of getting rid of farm waste. Farmers must firstly be required to provide safe and secure storage for animal manures, slurries, silage effluent, dairy wastes and soiled waters. Such materials should be regarded as a resource to be reused and recycled in accordance with Department of Agriculture, Food and the Marine (DAFM) recommendations and guidelines. In accordance with good practice, clean water from roofing systems and yards should be kept out of effluent and waste holding facilities so as to ensure efficient use of such containment facilities. Good management practices also minimise the areas of farmyard which become soiled and contaminated. Due to the extensive size and water demands of ICWs it may be necessary to consider the implications of surface water abstractions to sustain the wetlands during periods of dry weather.

### Aquatic Habitat Protection (including protection of Riparian Habitat)

A policy in relation to aquatic habitat protection should be included in the CDP. Protection of the aquatic environment has to date been generally addressed on an ad-hoc basis under planning control/legislation.

The current planning regulations do not sufficiently address issues of wetland and watercourse protection and management. The impacts of some developments on the aquatic environment may only become apparent in the long term. Developments such as road and bypass development, urbanisation, flood relief, afforestation and river drainage have caused and are causing major disturbances to the physical habitat.

“Development” can require that extensive sections of wetland and watercourses be drained, altered and diverted, flood plains may be modified to accommodate housing and industrial development. Impermeable surface areas in towns and on motorways have increased giving rise to increased runoff, and smaller streams and rivers have been culverted to accommodate development. The Planning Authority under the terms of the EU Water Framework Directive (2000/60/EC) is legally obliged to protect the ecological status of river catchments and channels. Therefore, consideration has to be given to other factors including flow, drainage, dams, bank erosion, quality of instream vegetation and riparian habitat etc.

The impacts of development when not policy driven or environmentally managed are numerous. The destruction of riparian areas along river banks results in fragmentation of riparian habitat within the river corridor, loss of cover for fish and aquatic animals and can further reduce the value of waterways as amenity areas. Watercourses are natural corridors for fish and wildlife movement. They may be of significant amenity value or have such potential. They may also be of significance in terms of a town's traditional and social history.

Where development is proposed in the few remaining areas within our towns, open watercourses are considered an obstacle and are frequently the first natural features to be realigned/ culverted or covered over etc. It is a poor reflection on the development objectives which exist both at National and Local Planning level for the protection of the natural environment, when a stream or river which has existed for many generations in a locality with its own habitat, wildlife etc; is allowed to be covered over and in effect lost forever.

The disparity which currently exists must be acknowledged, e.g. a Tree Preservation Order will provide for the protection of a single mature oak tree in an area while in that same area permission may be given to culvert or cover over a stream or river. IFI requests that such disparity be addressed within the Development Plan. It is essential that watercourses be maintained in an environmentally and aesthetically sensitive manner for future generations to cherish and protect.

To insure that impacts from development or change in land use practices (including flood plain development) do not interfere with the aquatic environment it is essential that those areas adjacent to waterways (riparian buffer zones) are managed in a manner which will lessen impacts to these habitats. A riparian/buffer zone is a vegetated area near a stream, which helps shade and partially protect a stream from the impact of adjacent land uses. It is a discrete ecological and geographical entity. It is the point of contact between the land (i.e. the terrestrial ecosystem) and the freshwater body (i.e. the aquatic ecosystem). It plays a key role in protecting/improving water quality in associated watercourses (streams, rivers, and lakes), thus providing environmental benefits. With the decline of many aquatic ecosystems due to development (both urbanisation and agricultural production), riparian buffers have become a common conservation measure aimed at improving water quality and lessening pollution impacts. The riparian/buffer zone must be sufficiently wide to

protect the watercourse. Riparian buffers in addition to water quality benefits (bank stabilisation, interception of nutrients, sediments and pesticides) also provide habitat benefits in terms of providing shade, enhancing instream diversity (overhanging vegetation creates niches and supplies invertebrates and leaf-litter into the aquatic zone) and help mitigate habitat fragmentation by providing connectivity i.e. as linear features in the landscape. Riparian zones/woodlands can reduce fragmentation by connecting isolated habitats/woodlands, thereby creating greater structural diversity and critical mass.

Protection of aquatic zones can require riparian/buffer zones of up to 50m. The width of the riparian/buffer zone will depend on factors such as land use, land topography (e.g. slope), soil type, channel width/gradient and critical habitats to be protected.

Numerous Local Authorities in the review and preparation of their respective development plans have included specific policies which reserve riparian/buffer zones free from inappropriate development along banks of rivers and streams for the purposes of, inter alia, providing habitat, river maintenance, access for anglers, walkers, recreational area and pollution buffer zone and have undertaken to maintain such corridors.

However, some local authorities appear to consider a set-aside adjacent to watercourses solely for the purpose of channel maintenance i.e. biodiversity/amenity etc. requirements are not a consideration. Kildare County Council is urged to acknowledge and address the need for riparian habitat protection. The protection of habitats outside designated areas and a Council commitment to reject proposals that would interfere with natural floodplains would greatly benefit both aquatic and riparian habitats.

#### Invasive Species

The Development Plan should include policies to ensure that developments do not lead to the spread of invasive species. Invasive species may drive local native species to extinction via competitive exclusion, niche displacement or hybridisation with related native species. For example, Himalayan balsam, Giant hogweed and Japanese knotweed compete with native bank vegetation undermining banks resulting in increased erosion and siltation of fish spawning beds. Giant Hogweed is also a human health hazard. Zebra mussels and Asian clam compete with fish and alter the water chemistry of a waterbody, they can also mask the effects of eutrophication/enrichment. Invasive species can transform habitats and endanger whole ecosystems with serious implications for the environment and the economy. An example of a proactive policy in this regard would be to prohibit invasive species from inclusion in landscape design proposals. Landscaping proposals etc. should require the use of native species from local stock.

#### River Crossing Structures

The impacts of poorly designed river/stream crossing structures can be serious in terms of habitat loss. Prevention of the free upstream migration of fish species such as Salmon, Trout and Lamprey effectively results in the loss of spawning habitat upstream of the barrier to migration. This could have serious implications for the populations of fish species concerned and contravenes the legal obligation under the WFD to protect the ecological status of river catchments and channels. Indeed, it is an offence under the Fisheries Acts to prevent the free passage of fish. When structures are being designed for crossing waters, consideration must be given to the following biological criteria: species of fish required to safely pass; size of fish required to pass (life stage); time of year in which fish passage is required; and high and low design passage flows etc. Bridges and bottomless culverts have the least impact on fish passage. The Plan should include a clear policy on the use of clear span structures where possible on fisheries waters and that IFI should be consulted on any such proposed developments.

### Stream Fragmentation

The CDP should include a clear policy on the prevention of river fragmentation and to encourage the connectivity or the re-connectivity where possible on applicable waters.

### Water Conservation

The Development Plan is an opportunity to promote policies and awareness of water conservation which may ultimately result in a reduction in water use. Water conservation and water use efficiency are central elements of any strategy to enhance water supply reliability, restore ecosystems, and respond to climate change and changing demographics. Significant increases in water conservation and water use efficiency will be required to ensure reliable water supplies in the future. Best practice should be promoted in respect of water conservation in all developments through methods such as rain water harvesting. Another problem which is particular to summer months (when river/stream flows are often low) is wide scale unregulated water abstraction for crop irrigation. This practice may have significant ecological implications/impacts if large volumes of water are abstracted over a short period of time from small fish nursery or spawning streams. Such abstractions during dry weather or drought periods could have severe repercussions for aquatic habitats, fish stocks and accordingly the ecological status of watercourses in terms of the Water Framework Directive (WFD).

Accomplishing water conservation and water use efficiency goals will require action by all water users, including residential, commercial, industrial and agricultural water users, local and regional planning agencies, state agencies, chambers of commerce, and business, commercial and industrial professional and trade unions/associations.

### Sustainable Urban Drainage Systems (SUDS)

The requirement for the inclusion of SUDS for surface water disposal is a positive indicator of the Council's intention for the sustainable development of the area and should, in conjunction with good management of the site, aid in flooding and pollution management. Such a design should be included in all development design proposals.

### Management Policies

River Management Policies should be an integral part of any County development process and all waterways within the County should be considered as a natural resource requiring protection and development. The following mechanisms for protection of the aquatic environment should be considered:

- River Corridor Management Areas which provide for the protection and development of the aquatic environment (particularly within towns and cities).
- Special Preservation Orders provided for specific habitats in need of protection e.g. an Aquatic Protection Order.
- Special Amenity Areas, identified for their potential as Linear Parklands along waterways.

Within the context of the CDP, a watercourse could be assessed in relation to its existing aesthetic, amenity and recreational value, its potential for improvement and protection and the requirements to achieve this potential i.e. control of further physical interference, water quality deterioration, access, community participation etc.

Rivers and watercourses are assets which provide a basis for the development of visual and amenity features of the areas through which they flow. In housing and industrial site planning they provide a feature around which landscape design and development can be based. They can provide a focus for the involvement of the communities in the protection of water quality and the biological/wildlife diversity of aquatic habitats within these areas.

The 1997 Habitats Regulations and Special Areas of Conservation (SAC) Directive does not extend to the inclusion of all aquatic habitats of fish bearing importance or of amenity value.

Therefore, the reliance of the Development Plan on these area designations solely will exclude significant numbers of waterways which are in need of protection. IFI requests that the Development Plan provide for the maintenance and preservation of all watercourses, wetlands and associated riparian habitats.

In determining the likely significant effects of the CDP, consideration should be given to potential significant impacts on:

- Water quality
- Aquatic and associated riparian habitats
- Biological Diversity
- Ecosystem structure and functioning
- Fish spawning and nursery areas
- Surface water hydrology
- Passage of migratory fish
- Areas of natural heritage importance including geological heritage sites
- Sport and commercial fishing and angling
- Amenity and recreational areas

The CDP should:

- Be consistent with River Basin Management Plans and comply with the requirements of the EU Water Framework Directive (2000/60/EC).
- Include policies which preclude developments in areas where the sewage infrastructure facilities necessary for development do not exist.
- Advocate a change from an acceptance of river corridor interference to an assumption against it.
- Promote the integration and improvement of natural watercourses in urban renewal and development proposals.
- Encourage Local participation in urban and rural renewal.
- Include provision for consultation with IFI on developments which may impact on the aquatic environment.

The above points have been published by Inland Fisheries Ireland in their 2017 submission to the National Planning Framework and certainly hold true for Kildare's County Development Plan also.

It is the view of the Climate Action Linkage Group that due to its ever-increasing population, Kildare is currently and will continue to be under significant landuse pressures.

- New demands will be made on the Liffey and Barrow to dump wastewater and to extract drinking water.
- Developers will endeavour to build as close to or on top of riparian stretches and wetland if the Council continues to make provision for inappropriate zonings.
- Surface water contains contaminants and therefore methods need to be considered to stop direct discharges of surfacewater directly to watercourses, by the innovative use of swales and constructed wetlands
- The Development Plan should provide maps of the various rivers, streams and wetlands and their associated catchments for ease of reference when planning decisions are required.

In recent a report on the State of the Environment 2020, by the EPA, it is clear our planning policies have not been working to date. The report highlights Climate and Nature as significant problem areas for Ireland.

In addition to point 1 to 8 above, The Climate Action Linkage Group would also like to raise the following additional water related issues.

#### Security of water supply

Although the Irish Climate has been getting wetter<sup>6</sup> The change in rainfall pattern is of equal significance to Kildare, with the East of Ireland experiencing increasingly lengthy droughts. The County Development Plan should ensure that Kildare's water infrastructure has sufficient storage capacity to ensure sufficiency of supply during droughts. This may involve increasing the amount of rainfall captured by constructing reservoirs or by liaising with neighbouring Local Authorities to ensure a secure and robust water supply for Kildare.

#### Water Harvesting

The CDP should also include mandatory water harvesting in all new buildings/developments. This would help reduce pressure on our finite and expensive supply of potable water.

#### One-off housing

The provision of one-off housing should continue to be strictly restricted to reduce the need to install oneoff septic tanks which have the potential to pollute groundwater.

#### ***What nature-based solutions are there for surface water management and how can these be integrated into the Plan?***

- See previous responses in Sections 2.2, 2.3,

#### ***Should the Plan give positive support to the development of renewable energy at the expense of other considerations?***

- See previous responses in Sections 2.1, 2.3, 2.4 and 2.6.
- This question needs to be further defined in terms of what 'other' considerations entails.
- Renewable Energy Developments require holistic assessment, considering impacts on local habitats and biodiversity as well as decarbonisation ability.

#### ***How can we encourage the use of renewable energy sources?***

- See previous responses in Sections 2.1, 2.3, 2.4 and 2.6.
- By employing suitably qualified staff to evaluate and explore options
- By listening to energy experts
- By fostering creative solutions

#### ***Given the rapid expanse of the digital world, ecommerce, on-line shopping, social media platforms and cloud solutions, there is increasing demand for data centre developments – how can Kildare best respond to this emerging demand, space and electricity requirements?***

- Require the incorporation of sustainability strategies in all new data centres, such as rainwater reclamation, solar energy and heat recycling as per numerous examples worldwide.
- Given that Ireland has the ideal climate for the location of these data centres, and that there will be very little associated employment upon completion, KCC should ensure that the county is getting sufficient value in housing these data centres, through annual levies, contributions to climate change mitigation or biodiversity enhancement in the community.

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<sup>6</sup> <https://www.maynoothuniversity.ie/icarus/news/ireland-wettest-it-has-been-more-300-years>

- Require that associated landscaping incorporate a sufficient quantity of native trees of local provenance as screening.

***Are there economic opportunities associated with climate change mitigation that the Plan can harness?***

- See previous responses in Section 2.2

## 3.0 Additional Feedback

### 3.1 Community Engagement

- One theme that is seemingly missing from the Issues Paper is Community Engagement.
- KCC should create a policy of engaging citizens in climate and biodiversity action as part of the CDP:
  - Implement a 'green participatory budget' where local residents can engage with the council on climate initiatives in their local area.
  - Roll out a community activation programme for households and businesses such as tree planting, planting for biodiversity, stop use of pesticides, stop mowing lawns, water conservation, GIY etc, community gardens, community orchards.
  - Lead and facilitate community conversations in climate education and action.
  - Engage the community in citizen science.

### 3.2 Structure of the Plan

- We would like to renewed focus in the process of developing County Plans, ensuring that the planning process clearly identifies not just what the Council hopes will be developed, but is an actual fit for purpose plan identifying, for example:
  - What timeframes are set over the course of the plan?
  - How do we ensure that any targets are achieved?
  - What part of the plan or process has to change to ensure the plan is achieved?
  - Do we need to change the enforcement process?
  - What management and feedback loops are contained in the plan?
  - Are all parts of the plan actively driven and managed by the council?
  - Who is responsible for achieving what part of the plan?
  - Are additional expert resources required for specific targets?
  - What targets will be achieved through collaboration with other bodies or individuals?
- We would like to point out that current plans, for example, the Kildare County Council Climate Change Adaptation Strategy (2019 – 2024)) uses many verbs such as: "explore" "assess" and "consider". To achieve anything, plans need to be specific and to clearly articulate the actions being taken to achieve goals and targets. If the CDP is guided by the current Climate Adaptation plan, we are not sufficiently on track to achieve climate related goals..
- We would like to see the CDP structured with overall goals, specific realistic measurable targets with key performance indicators. It should be broken down into specific steps with target dates.
- Key performance indicators need to be present, actions must be measurable, have to be accountable and enforcement.
- Metrics used must be based on actual impact. For e.g., '10 SECs Established' is not impact. It is the subsequent achievements of these SECs (emission reduction, renewable energy generation, etc.) that matter. Impacts are what metrics should be based on and how progress should be measured.
- Targets should be science based.
- We believe the plan should include much longer-term goals as, if these are not identified now and work started on them, they will never be achieved.
- We would like to see a reporting structure set up by KCC to communicate progress on these targets. We would also like to see in the plan discussion on the targets being aimed for.
- We would like to see more detailed feedback to community groups regarding unsuccessful funding applications in order to facilitate greater success in future funding applications.
- Reviews of progress at regular intervals should be built into the CDP, so that the public have sight into what has been achieved on time, and what has yet to be achieved.

### 3.3 Accessibility of information

- In an attempt to make planning information more easily accessible to the general public and to encourage more inclusive participation, we would like to request that some thought be given to the presentation of the Development Plan information on the Kildare County Council website. See: [Kildare County Council > All Services > Planning > Development Plans> Kildare County Development Plan 2017-2023](#)
- While we acknowledge that a person is freely entitled to purchase a copy of the development plan, we would like to suggest that more thought should be given to how this information is presented to the public. For example:
  - The planning page is poorly laid out. For instance, the top of the page has two links which give the impression that these are the only links on the page. When opening this page on a standard laptop, it is very easy to miss the links further down at the bottom of the page as there is additional text in between.
  - Further down the page there are a number of different links with non-standardised font formatting and unclear titles. To anyone unfamiliar with County Development Plans, it is a difficult to interpret this page.
  - Please note that within the County Development Plan: While local town/village information is for the most part contained within a single page; the town/village maps are not on the same page as the corresponding information on that area. This makes it difficult for the public to follow local information of interest.
  - We suggest that local area maps be orientated in the north/south direction, and interpretation keys are in an upright orientation, to allow ease of interpretation and to make them clearly legible in computer format.

### 3.4 County Plan Development Consultation Process

- While public consultation on the County Development Plan is welcomed, we feel the process may not be working as well as hoped. The various County Council and PPN meetings have witnessed a small number of well-informed individuals in attendance.
- In engaging with this process, we recognise that it is very difficult to participate in the planning process when we have had no genuine review of the existing plan and the management processes around it. We feel that the planning process is not accessible to the general public for reasons already stated here; and, in addition, most people in the community do not have time to locate and wade through the various reports, particularly when there is a lot of repeated information.
- Additionally, many people would rightly feel that they do not have sufficient expertise to comment knowledgeably on the questions posed in the Issues paper.
- We are entirely reliant on KCC possessing sufficient expertise or hiring such expertise to guide elements of the CDP relating to climate science, renewable energy, biodiversity, sustainable land use etc.
- A large number of questions that form part of this consultation are highly technical and require specific expertise. We are highly concerned, that we the non-expert public are being asked to input answers to these questions, and are not clear what input or review from experts has or will occur as part of this process.
- It is highly worrying that these technical questions should be presented to the public in this manner without demonstrating that possible solutions have already been researched and good ideas and proposals to address each area have been put forward. It is of limited value that members of the general public should have to research the solutions to these questions and make submissions.
- The required time to read all 66 questions in the Issues Paper, let alone carry out the research necessary to understand the significance of these questions, to the preparation of answers is an enormous barrier to engagement by the public, and volunteer community groups.

- We would like to understand:
  - What are the goals of the public consultation process?
  - What results are the Council hoping for?
  - How the design of the public consultation process aligns with, and hopes to achieve, those aims?
  - We appreciate that the community absolutely must engage with this process, but we feel that the format as presented is not productive.
  - We presume that the data from this initial consultation process will be collated and disseminated in some form. We would like to request that all submission points be bullet pointed under relevant headings, in a simple straightforward document. Submitted items for consideration should be grouped and subtended by a comment of:
    - Accepted for further consideration or
    - Not considered and briefly why

## 4.0 Conclusion

We are at a critical moment of time in terms of tackling both the Climate and Biodiversity Challenges. The decisions we make, and the structures we put in place, as part of the CDP, will decide what role Kildare will play in being either a leader or a laggard on these important issues.

Our vision for Kildare is a county where people can live in dignity and harmony with the natural world. Where communities can thrive. Where innovation to tackle these challenges is fostered. Where we can live and work sustainably and pass on our communities to the next generation in as healthy a state as we possibly can.

We argue that it is time now for demonstrable action, with targeted time-bound achievements, and sufficiently punitive measures to deter actions that are not in support of climate change mitigation measures or biodiversity loss measures.

We are asking Kildare County Council to become a leader in Climate and Biodiversity Action, and to show the commitment and leadership needed to tackle Climate Change and Biodiversity Loss.

## Appendix A Biodiversity and Natural Heritage List of Publications

### Heritage

- No publications

### Biodiversity of County Kildare

- No publications

### Kildare Biodiversity Action Plan

- Publications:
  - County Kildare Biodiversity Plan (2009-2014)

### All Ireland Pollinator Plan:

- Publications:
  - Gardens: Actions to help pollinators
  - Farmland: Actions to help pollinators
  - Local Communities: Actions to help pollinators
  - Businesses: Actions to help pollinators
  - Faith Communities: Actions to help pollinators
  - Councils - Actions to help pollinators
  - School: Pollinator How to Guide
  - Junior Pollinator Plan
  - Protecting Farmland Pollinators for Kids

### Hedgerows

- No publications – webpage not available

### Geology of Kildare

- Publications
  - The Geological Heritage of Kildare - Kildare Audit - 2005 (GSI, HC, KCC)
  - Bedrock Geology of County Kildare – 2004 (OSI)

### Green Infrastructure and Habitat Mapping

- Publications:
  - Green Infrastructure Report Kildare – 2011 (Kildare, Newbridge and Kilcullen)
  - Map of Kildare Green Infrastructure – 2011 (Kildare, Newbridge and Kilcullen)
  - Local

### Local Biodiversity Action Plans

- No publications – webpage not available

### Saving Swifts

- Guardians for the Swift (Birdwatch Ireland Publication, NPWS)

### Biodiversity Week

- No publications