



Uimhir Thagarta Uathúil: KCC-C55-490

Údar: Sherwood Homes

Stádas: Submitted

Aighneacht:

Submission prepared by Tom Phillips + Associates on behalf of
Sherwood Homes

Comhairliúchán:

Draft Kildare County Development Plan 2023 - 2029

2. Core Strategy

Caibidil: Volume 1 - chapters » 2. Core
Strategy

Ábhair: Core Strategy

Chapter 2: Core Strategy & Settlement Strategy

We submit this Submission on behalf of Sherwood Homes Limited, Ratoath, Co. Meath.

Overview of the Submission

In summary, we seek the following, namely that:

1. The *Amended Draft Plan* be updated to reflect the findings of **Census 2022**, rather than **Census 2016**, and that it reflects the subsequent influx of Ukrainian Refugees that will result in a higher base population.
2. The HNDA be based on the concept of a 'floor' rather than a 'ceiling,' the former as pertains in Scotland; the latter as referenced in Ireland. (See quote below.)
3. A time commitment be given in Objective CSO 1.9 (Local Area Plans) and in Objective CSO 1.15 (lands zoned for employment purposes) for the review and updating of the mandatory LAP for Maynooth, not least as the current LAP dates from 2013-2109.

Footnote 8 of the *Draft Development Plan's* Table 2.8 (of the Settlement Hierarchy Population and Housing Unit Targets Q1-2023 to Q2-2028) states:

"Additional population allocation for Maynooth of up to 10,000 persons from redistribution of NPF City and Suburbs allocation (EMRA, July 2020). The precise allocation that will be attributed to Maynooth however will be determined at LAP stage on foot of detailed assessments and audits of available social and physical infrastructure."

As currently composed, the Draft suggests that Maynooth LAP updating could be deferred until 2028, the end of the new Development Plan. At that time, the LAP would be 15 years old, notwithstanding the increased planning role for Maynooth identified in the National and Regional Planning strategies, including significant residential expansion, as well as the potential effect of DART West on accessibility.

In a recent study by Ronan Lyons (the noted TCD economist and Member of the Government's Housing Commission), he notes *inter alia* that:

"Firstly, despite the stated aim of the NPF that local authorities develop a long-term strategic view of housing need, the implementation of the HNDA so far appears to have been based on an assumption by the OPR that numbers given by the exercise represent ceilings, rather than floors or centres of a range on which LAs can develop their own estimates. An equivalent system in the UK takes the resulting numbers as floors (minima) rather than ceilings (maxima), reflecting the clear empirical evidence that greater availability of housing improves its affordability. Moreover, in relation to the use of numbers so far, it appears to be an implicit assumption by the OPR that zoning by local authorities converts fully into the construction of new homes. However, data on Irish land use, construction and housing suggest that this assumption cannot be sustained. More fundamentally, numbers from a projection exercise should never be taken as definitive: they can only ever be regarded as illustrative of housing need and reflecting the assumptions made. Ranges, rather than precise numbers, should be used to guide policy, and where pressures emerge, local authorities should be able to reflect this in development plans."[Our emphasis.]

Accordingly, review of the *Maynooth Local Area Plan 2022-2028* must be a priority for the forthcoming Development Plan.

Attachments:

KCC-C55-490-10910 - Kildare DCDP 2022 on behalf of Sherwood Homes.pdf