

The Administrative Officer,
Forward Planning,
Áras Chill Dara,
Devoy Park,
Naas,
Co. Kildare.



18/05/2022

Submission to the Draft Kildare County Development Plan 2023-2029.
This submission seeks to have lands zoned for Residential Use at Drennan, Derrinturn, Co. Kildare.

AKM Design
Unit 6
Kingswood Business Centre
4075 Kingswood Road
Citywest Business Campus
Dublin 24
D24 A068

Dear Officer,

Please consider our submission to the Kildare Draft Development Plan on behalf of Joe Mulligan of [REDACTED]. Please send us an acknowledgement of our submission. Please see enclosed appendices showing a map of the site and refer to appendices A, B, C.

P: +353 1 479 6234
E: info@akmdesign.ie
W: www.akmdesign.ie

1.0 Introduction

Joe Mulligan owns a 1.2 hectare site in the town centre of Derrinturn. Mr. Mulligan previously constructed 26 no. Dwellings on the adjacent land known as Ballyshannon Manor. The lands are ideally located in terms of Sequential Development within 400 metres of the identified town centre and despite Mr. Mulligan's submission on the last four successive Draft Development Plans these lands have overlooked for residential development while lands on the outer edge of the town centre have been zoned. We submit that the lands are centrally located in Derrinturn, adjacent to all essential, retail, educational, health care and recreational amenities and comply with principle of 'Sustainable Communities' and 'Active Travel'. We ask that Kildare County Council consider this submission, through their reserve and executive function and that the land be zoned 'New Residential' within the Kildare County Development Plan 2023-2029.

2.0. Risk of No New Homes in Derrinturn from 2023-2029

The Draft Kildare County Development Plan 2023-2029 identifies Three unconnected site zoned 'New Residential' for Derrinturn. The Site to the West, identified as '1' in Appendix A is already practically completed. The Site to the North, identified as '2' in Appendix A is also practically complete. The site to the West identified as '3' in Appendix A has been zoned, in part, 'New Residential' in the last four County Development Plans. Despite this, the site remains undeveloped. This suggests a likelihood that this site could remain undeveloped. It may be the case that the land is 'landlocked'.

If Site 3 remains undeveloped, there will be no new homes within Derrinturn town in the lifetime of the Kildare County Plan 2023-2029.

3.0 Criteria Supporting the Re-Zoning of the Subject Lands to New Residential

3.1 Town Centre First

The subject site is within 500 metres of Derrinturn town centre and is therefore consistent with the 'Town Centre First- A Policy Approach for Irish Towns' prepared by the Department of Housing, Local Government and Heritage and the Department of Rural and Community Development in February 2022.

3.2 Sequential Development

The subject site is closer to Derrinturn town centre than other sites which have been zoned for residential development. This is contrary the policy of Sequential Development'. The applicant has made an application to have the lands zoned for residential use in the last three successive Kildare

County Development Plans. The lands have been overlooked on each occasion despite the ideal location within the Town Centre.

3.3 Fully Serviced Site

The subject lands are fully serviced with vehicular access and proximity to all water services.

3.4 Intention to Development

The lands are in the ownership of an entity that can deliver housing efficiently. It is the intention of the owner to provide houses for sale and not 'build to rent'.

3.5 Potential for Affordable or Social Housing

The owner will consider delivery of housing at this location under the recently introduced 'Affordable Housing Scheme' or delivery through an Affordable Housing Body'.

3.6 Consistent with Submission of The Office of the Planning Regulator.

The Issues Paper for the Draft Kildare County Development Plan 2023 – 2029 submitted by the Office of the Planning Regulator, 8th of March 2021 states;

Compact growth is one of the National Strategic Outcomes of the NPF, with a target under NPO 3c to 'Deliver at least 30% of all new homes that are targeted in settlements other than the five Cities and their suburbs, within their existing built-up footprints'.

The Subject Site is within 500 metres of the settlement centre.
The Issues Paper also states;

'Planning authorities will be required to apply a standardised, tiered approach to differentiate between i) zoned land that is serviced and ii) zoned land that is serviceable within the life of the plan.'

The subject Site falls into category (i) whereas the site to the East which is zoned for residential use in the Draft Kildare County Development Plan 2023 – 2029 appears to fall into category (ii).

3.7 Zoning Lands in Derrinturn town centre will reduce pressure for One-Off Houses in the Rural Hinterland.

The Office of the Planning Regulator notes that;

...there remains considerable pressure for the development of single homes in rural areas across County Kildare '15.
Having regard to the above, it is important that the forthcoming plan provides a strong policy framework to protect against urban generated housing in open countryside and to proactively address issues of town/village decline and compact growth.
In this regard, the plan's policies will need to demonstrate consistency with NPO 15, NPO 19 and NPO 20.
Furthermore, the plan will need to consider the practical implementation of appropriate policy objectives through suitable land activation approaches and proactive facilitation of the building of homes within the existing footprint of rural settlements through measures such as site acquisition and serviced sites, consistent with NPO 18a and NPO 18b.
Such initiatives have the potential to alleviate pressure on the open countryside through provision of a desirable alternative to one-off housing for families who would like to live close to the facilities, services and amenities available in rural villages and towns whilst maintaining ties to the wider rural community.

The subject site can yield in the region of 40 housing units and therefore can facilitate in directing housing into the settlement centre and reduce the pressure on the surrounding rural hinterland.

3.8 The Requirement for Additional Lands in Appropriate Locations for Housing

National Policy is to deliver 33,000 houses per annum under Housing for All. Due to site closure due to Covid 19 significant delays have occurred in housing completions. Upward pressure on building costs and *difficulties* in supply lines for building *materials* have caused sites to close reducing supply. There is therefore an increased need in short term supply of housing in sustainable locations that are fully serviced.

Derrinturn meets all the criteria set on in the Department of Housing, Local Government and Heritage document 'Quality Housing for Sustainable Communities'. The subject site is within 750 metres and has all essential services including schools, shops, recreational facilities, public transport and a regional health centre.

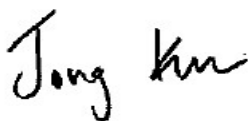
The Ukrainian crisis has resulted in increased housing demand which was not anticipated under the NDP.

3.9 Conclusion

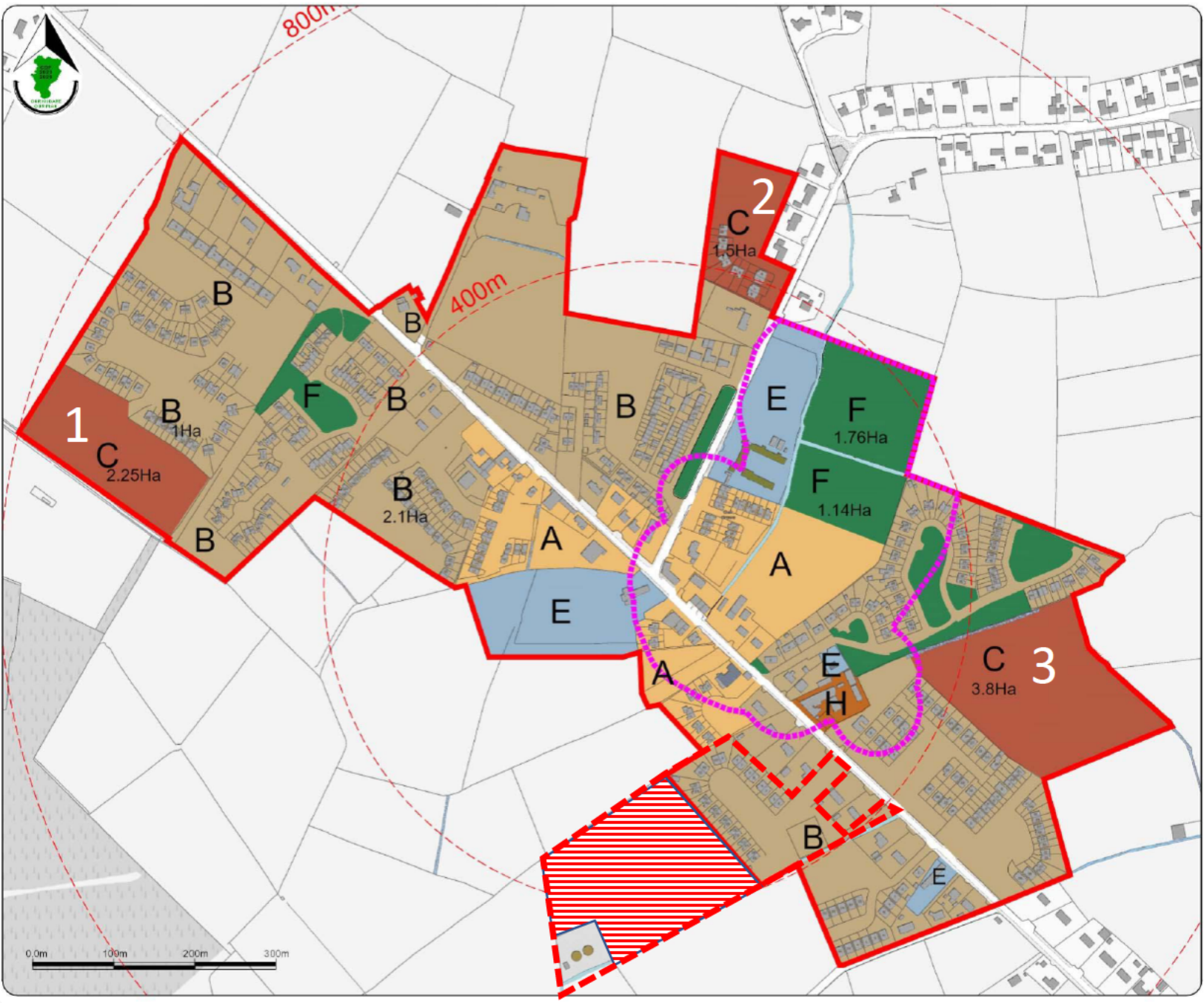
- The Subject Lands should not have been overlooked for zoning if Kildare County Council complied with the principle of sequential development in Derrinturn.
- If the Subject Lands are not zoned 'New Residential' there is a likelihood that there will be no new housing in the lifetime of the Kildare County Development Plan 2023 — 2029.
- The subject lands are serviced and located entirely within 500 metres of Derrinturn Town Centre.
- The lands meet the requirements for sustainable communities.
- The re-zoning of the lands to 'New Residential' meets national policy and is consistent with the submission of the Office of the Planning Regulator.
- There is additional housing need since the making of the Draft Kildare County Development Plan 2023 - 2029.

We submit that it is appropriate to zone the Subject Lands 'New Residential' in the Kildare County Development Plan 2023 — 2029.

Yours sincerely,



Jong Kim MIPI
AKM Design



Legend:

- Small Town Boundary
- A: Town Centre
- B: Existing / Infill Residential
- C: New Residential
- E: Community and Education
- F: Open Space and Amenity
- H: Industry and Warehousing
- Flood Risk Assessment
- Distance from Town Centre (at 400m/800m)

Stage	Date	Description
Draft County Development Plan	14/09/2022	Draft Plan issued for Public Consultation
Draft County Development Plan	12/12/2021	Draft Plan issued to Elected Members

Land Use Zoning Map

Scale: N.T.S.	Map Ref.: V2-1.2a
Date: February 2022	Drawing No.: 200201226
Drawn by: D. Dolan <small>18/01/2022</small>	Directed by: L. Crawford <small>18/01/2022</small>
Approved by: C. O'Donnell <small>18/01/2022</small>	

This drawing is to be read in conjunction with the written statement.

Appendix A

Land Zoning Map for Derrinturn with Subject Lands indicated and Other Sites Zoned 'New Residential' Identified.

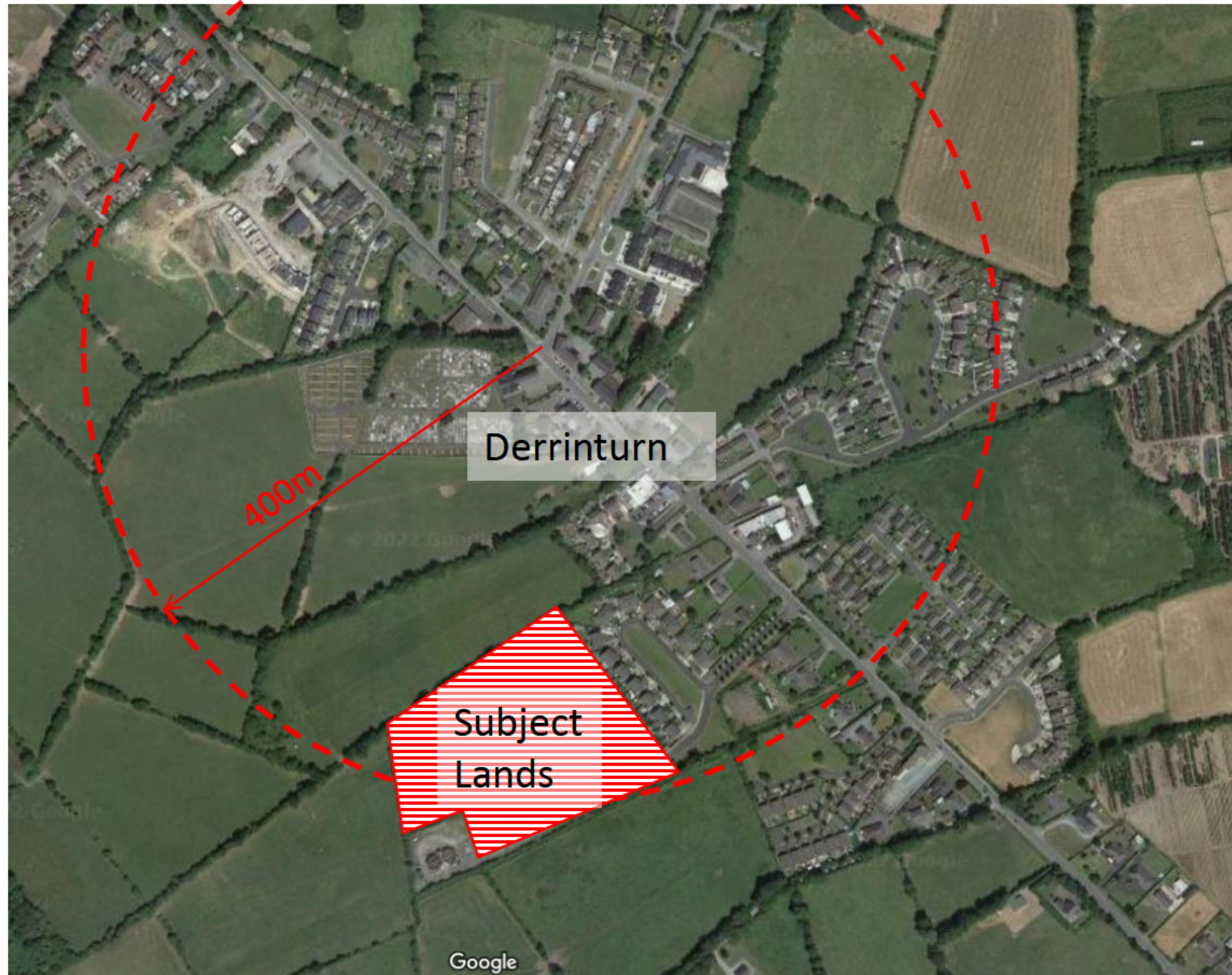
Land in Ownership of Joe Mulligan Surrounded Red Thus



Subject Lands proposed to be zoned 'New Residential' Outlined Shown Red Hatching Thus



Appendix B
Subject Lands Relative to
Derrinturn Town Centre



Appendix C
Potential Development

