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SUBMISSION

to

DRAFT KILDARE COUNTY DEVELOPMENT PLAN 2023-29

concerning lands at

BARBERSTOWN ROAD, STRAFFAN, CO. KILDARE

Client: KOCF Limited

17th May 2022

EXECUTIVE SUMMARY

David Mulcahy Planning Consultants Ltd, have been instructed by **KOCF Limited** to prepare a submission to the draft Kildare County Development Plan 2023-29 concerning lands measuring 1.09 hectares at Barberstown Road, Straffan, Co. Kildare.

The lands in question are owned entirely by KOCF Limited in a single landholding.

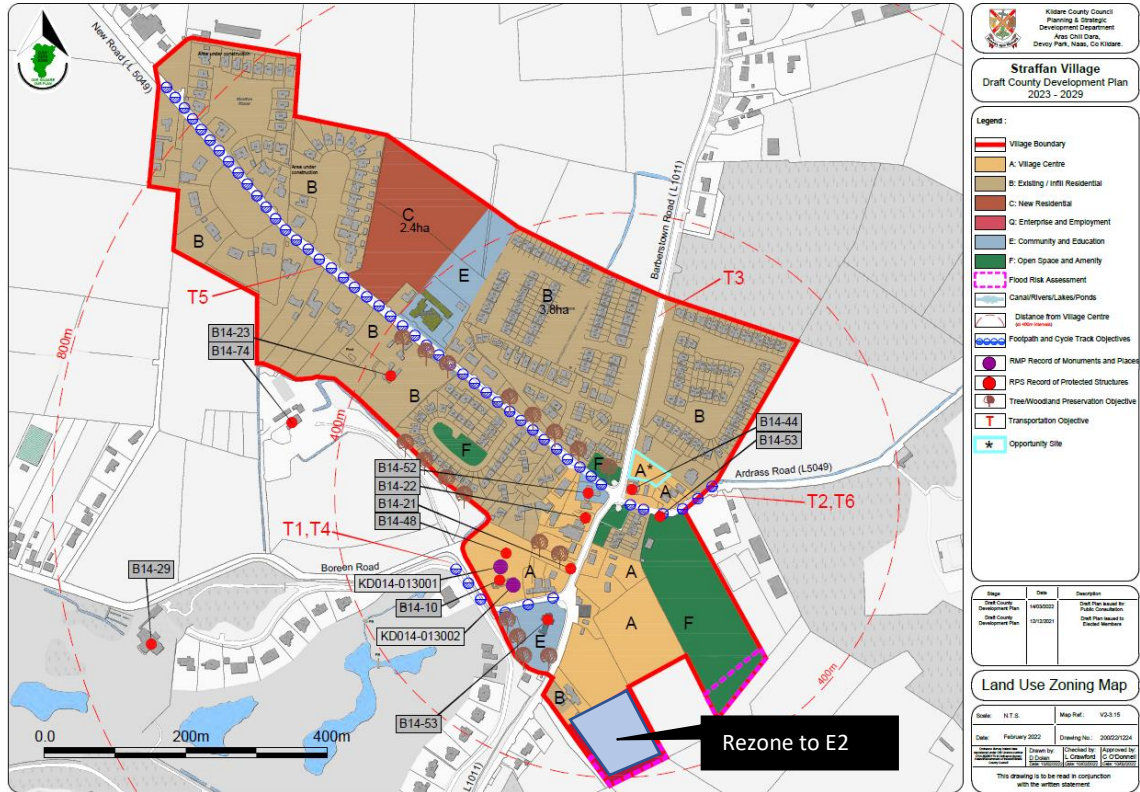
A report from Conor Furey Consulting Engineers demonstrates that there is no flood risk associated with the lands.

At present the subject lands, which are backland in nature, are **greenfield in nature** and are zoned for **Enterprise and Employment** under the KCDP 2017-23.

The draft KCDP 2023-29 again zones these lands for **Enterprise and Employment**.

This submission will demonstrate to the Council that the **lands should be rezoned Education and Community, with a specific objective for Nursing Home use.**

A nursing home use would generate significant employment opportunities, be compatible with the adjoining residential development under construction and provide a much needed facility for this part of the county based on demographic trends.



Straffan Village Zoning Map in the dKCDP 2023-29 adapted to show proposed new E2 Zoning Objective to facilitate Nursing Home use.

1.0 INTRODUCTION

David Mulcahy Planning Consultants Ltd, have been instructed by KOCF Limited to prepare a submission to the draft Kildare County Development Plan 2023-29 concerning lands measuring 1.09 hectares at Barberstown Road, Straffan, Co. Kildare.

The lands in question are owned entirely by KOCF Limited in a single landholding.

A report from Conor Furey Consulting Engineers demonstrates that the lands are serviceable.

At present the subject lands, which are backland in nature, are greenfield in nature and are zoned for Employment under the KCDP 2017-23.

The draft KCDP 2023-29 again zones these lands for Employment.

This submission will demonstrate to the Council that the lands should be rezoned **Education and Community**, with a specific objective for Nursing Home use.

2.0 BACKGROUND

2.1 Location

The subject lands are located on the south west side of Straffan village, close to the village centre, on the south side of the Barberstown Road, at the rear of a site which is being developed for residential dwellings (The Darley).



Fig No.1 Site Location Map (source: Myplan.ie - OSI Licence No.EN 0080915)

2.2 Description

At present the site is primarily greenfield in nature and enclosed by mature trees and hedgerow, apart from the north boundary which is not defined. Straffan sewerage treatment plant is located in the south-west corner of the site.

There is a vehicular entrance off Barberstown Road to the sewerage treatment plant.



Fig No.2 Site Context Map (source: Myplan.ie - OSI Licence No.EN 0080915). Red line indicative only, refer to site layout plan for accurate red line boundary.

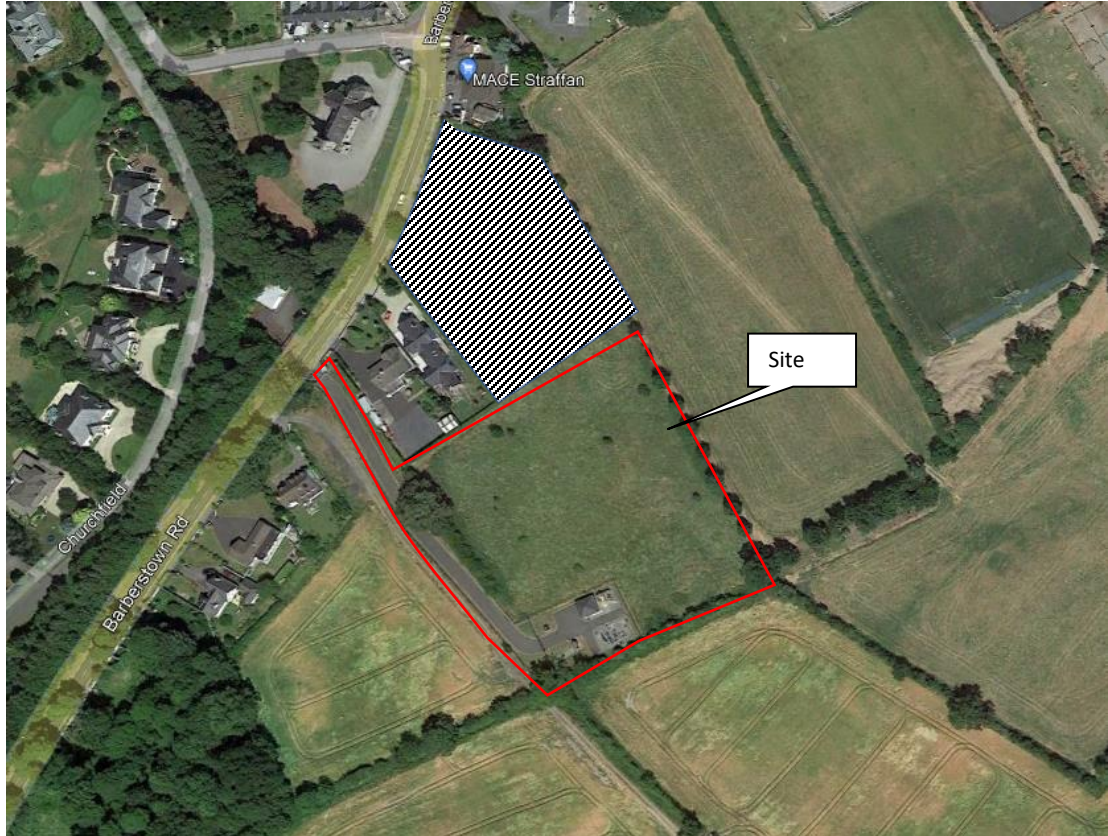


Fig No.3 Aerial photograph of the site (source Google Earth Pro, June 2018). The hatched area has been developed for housing - The Darley.

2.3 Ownership

The applicant owns the entire site¹.

2.4 Constraints

The lands are free of any natural or built heritage constraints.

¹ Southern portion of Folio Ref. KE36621F. There is a wayleave along the western portion of the folio to the WWTP.

2.5 Flood Risk

A report from Conor Furey Consulting Engineers **enclosed** confirms that there is no flood risk and this was not an issue in the recent planning application on these lands.

2.6 Services

There was no issues raised by the Council in respect of services under the recent planning application on these lands in respect of a nursing home.

2.7 Adjoining Land Uses

South

Agricultural fields adjoin the site to the south.

North

There is a field to the north of the site which has planning permission for residential development (see details below). The Barberstown Road runs of same and includes a public footpath which connects back into the village centre.

There are 2 no. residential dwellings to the north of the site, one whose boundaries adjoin the site.

West

Agricultural fields adjoin the site to the west.

East

Agricultural fields adjoin the site to the east.

2.8 Public Transport

The number 120 Bus Eireann service serves the Straffan to Dublin route and has an almost hourly service in both directions. There are two bus stops on either side of the L5049 approximately 250m from Barberstown Road to the north of the subject site.



Fig.4 Proximity to bus stops for 120 bus routes

2.9 General Area

The subject site is located in the village of Straffan which has a population of 853 people as recorded in the 2016 Census². The general area where the site is located in the village is characterised by community land uses (church, GAA) with a shop, some housing and agricultural land. Straffan Church of Ireland church, which is located on the opposite side of Barberstown Road is a Protected Structure.

² No update on Census due to Covid 19.

There is **no nursing home in Straffan or its hinterland**. The closest nursing homes for this catchment are in Celbridge (Glenashling or Elm Hall Nursing Homes), Maynooth (Maynooth Lodge or TLC Nursing Home) or Prosperous (Hazel Hall). These nursing home options are all understood to be in high demand from residents in their own respective local communities which have notably high populations.

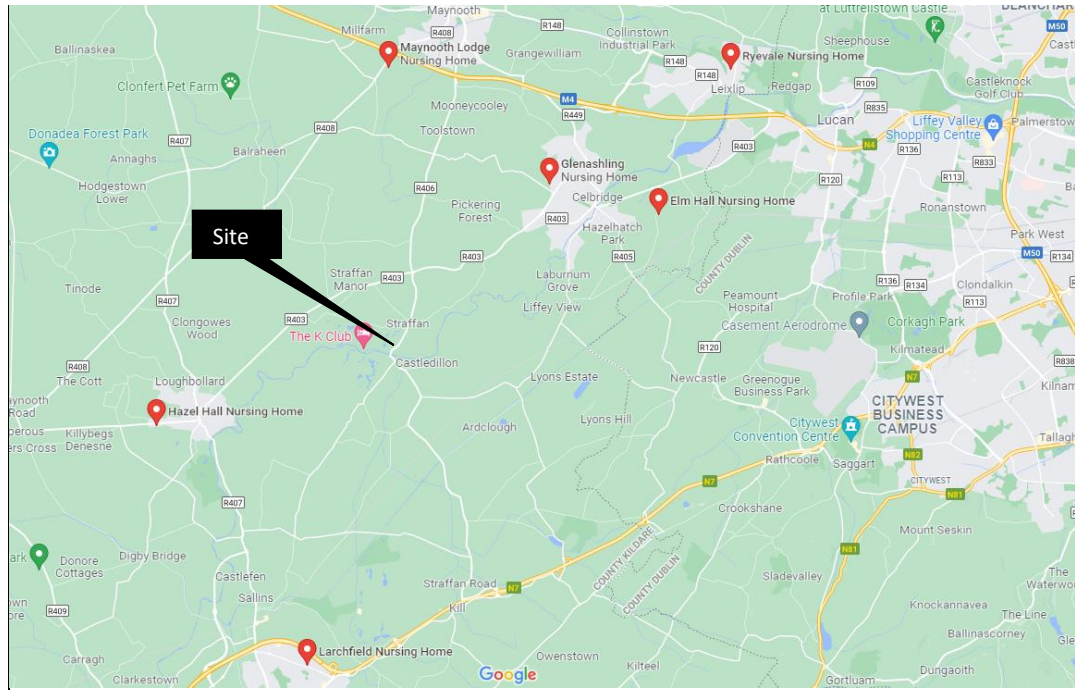


Fig. No.5 Nursing homes in north County Kildare relative to the subject site.

3.0 PLANNING HISTORY

3.1 Subject Lands

Reg. Ref. 05/2551

Conditional planning granted for **temporary works and use of lands to facilitate the Ryder Cup Golf.**

Reg. Ref. 21/1758

In February 2022 permission was refused for **two storey 91 No. bed nursing home** with an overall area of 4,572 sq.m and associated works for one reason relating to the fact that the proposed development materially contravened the zoning objective. This is current on **appeal** to An Bord Pleanála.

3.2 Relevant Planning History in the Vicinity (site to north)

3.2.1 **Reg. Ref. 21/1223**

An application has been granted for alterations to existing grant of planning permission (Kildare County Council Planning Reference Number 17/1299 and An Bord Pleanála Order No. ABP-303191-18).

3.2.2 **Reg. Ref. 211200**

An application has been lodged by the applicant for an **additional dwelling unit** to the south of existing grant of planning permission (Kildare County Council Planning Reference No. 17/1299 and An Bord Pleanála Order No. ABP-303191-18) at Lodge Park, Straffan.

3.2.3 **KCC Ref. 17/1299; An Bord Pleanála Order No. ABP-303191-18**

In April 2019 An Bord Pleanála granted permission for removal of existing derelict structures and **construction of 22 housing units.**

As part of the planning permission there is a road connection to the south providing access to the lands which are the subject of the current application.



Fig No.6 Permitted scheme to the north of the subject site (The Darley).

4.0 CONSISTENCY WITH PLANNING CONTEXT

4.1 National Planning Framework ('NPF') 2040

The framework plan deals with Age Friendly Communities and recognises that there is an urgent need for healthcare services given the rapidly ageing population.

ESRI projections indicate that the numbers of people aged over 65 will more than double to 1.3 million people by 2040, making up approximately 23% of the population. This compares to 13.5% in 2016. In addition, it is expected that the population aged over 85 will quadruple. As people get older they are likely to have increasingly complex healthcare needs, with a requirement for services and facilities to support provision of suitable and necessary care.

National Strategic Outcome 10 - Access to Quality Childcare, Education and Health Services

Services for Older People:

Additional capacity through long-term residential care beds to meet demographic needs and additional short-term beds to deliver an improved model of care for older persons.

4.2 Regional Spatial and Economic Strategy for the Eastern and Midland Region, ('RSES') 2019³

At its core, the RSES sets out a settlement and economic growth strategy that seeks to ensure that the needs of the Regions' citizens such as access to employment opportunities and services, ease of travel and overall well-being are met.

³ Currently the subject of a Ministerial Draft Direction.

Straffan is located in the **Dublin Metropolitan Area** which is the primary settlement area in the country.

By 2031 there will be a significant increase in the regional population aged over 65 and we need to plan for adequate healthcare, accommodation and services to enable independent living for as long as possible, encourage active lifestyles and address isolation for our older residents (pg. 16).

Provision of Health Services

REGIONAL POLICY OBJECTIVE 9.23

Facilitate the development of primary health care centres, hospitals, clinics, and facilities to cater for the specific needs of an ageing population in appropriate urban areas in accordance with RSES settlement strategy and core strategies of development plans.

4.3 Kildare County Development Plan ('CDP') 2017 – 2023 (As varied)

Section 4.7 of the CDP deals with 'Specific Needs Housing'. Under 'Housing for older people' it states that:-

"The changing nature of the age profile of the county requires greater consideration of the housing needs of the elderly. There are two aspects which need to be addressed in order to provide housing for older people:

– Sheltered housing, nursing homes and other residential facilities catering specifically for older people should be appropriately located close to public transport, community facilities, retail and other amenities".

The site is located close to commercial and community facilities in the village of Straffan i.e shop, café, churches, GAA etc. It is also within walking distance of the bus stops in the village (250m from the site).

It is important to highlight that Government policy seek to care for elderly people in their own homes and those persons who do end up in nursing homes tend, in

the main, to be immobile/bed-ridden or suffering from dementia. As such the residents do not generally avail of outside services. It is only staff or visitors who would avail of same.

Policies: Specific Needs Housing

It is the policy of the Council to:

- SN 1 Seek to ensure that groups with special housing needs, such as the elderly, people with disabilities, the homeless, those in need of emergency accommodation and Travellers are accommodated in a way suitable to their specific needs.
- SN 2 Support the provision of accommodation for older people in established residential and mixed use areas that offer a choice and mix of accommodation types to older people for independent living, semi independent living and assisted living.
- SN 3 Provide for and facilitate the provision of accommodation to meet the needs of older people and to encourage the provision of a range of housing options for elderly persons in central, convenient and easily accessible locations and to integrate such housing with mainstream housing.

4.13.9 Specialised Care Facilities

It is the policy of the Council to:

RH 28 Manage the provision of specialised care facilities, such as care homes, nursing homes etc in rural areas by encouraging applicants to locate in villages and settlements where services / facilities are more readily available and accessible.

The site is located in a village environment.

11.8.3 Older People

According to Census 2011, the '65 and over' age cohort has rapidly increased in Kildare, representing 7.9% of the total population living in the county.

This is an increase of 1.2% since 2006. There are very clear spatial differences with the rate of older people in rural Kildare at 10.4% compared to 7% in urban Kildare.

The CSO report Regional Population Projections 2016- 2031 projects that the number of old persons (65 years and over) will almost double in every region over the life-time of the projections, with the most marked increases are likely to occur in the Mid-East (+136.5%) and Midland (+95.1%) regions.

There is widespread recognition of the need to plan and design for housing, community and care facilities for the elderly.

The 'National Quality Standards for Residential Care Settings for Older People in Ireland' published by the Health Information and Quality Authority (February 2009) set standards for the provision of care facilities for the elderly. These standards provide a baseline for those with the responsibility for providing nursing home facilities and include specific standards for the design and layout of the internal and external environment of care facilities. This Plan will provide for a mixed urban/rural setting for nursing homes in the county.

A nursing home would increase the options available for elderly residents in the county who need nursing care in a dedicated residential care facility.

Policies: Older People

It is the policy of the Council to:

- OP 1 *Facilitate the provision of continuing care facilities for the elderly, such as own homes (designed to meet the needs of elderly people), sheltered housing, day-care facilities, nursing homes and specialised care units (e.g. dementia specific units) at appropriate locations throughout the county.*
- OP 2 *Cater for the diversity of older people's needs by promoting adaptability and flexibility in the design of homes, and the promotion of appropriate*

commercial and community facilities in population centres with higher proportions of older people.

OP 3 *Provide for a mixed urban/rural setting for nursing homes in the county and to site residential care facilities for the elderly in accordance with the following:*

(i) *Facilities should be located close to community and social facilities required by occupants (e.g. shops, post office, community centres, etc) thereby ensuring that older people can remain part of existing communities.*

(ii) *Facilities should be easily accessible for residents, employees, visitors and service providers. Such facilities will generally be acceptable in villages and rural settlements to cater for local demand. A mobility strategy shall be provided detailing connections to town and village centres for residents, employees and visitors.*

(iii) *Facilities should be located within an environment that is suitable for their stated purpose, integrating within the wider community while providing a safe environment for residents.*

(iv) *Facilities should be located in an area which can benefit from the creation of strong links between the care for the elderly facilities and the local community including activities linked to other community groups.*

OP 4 *To require the design and layout of residential care facilities for the elderly to comply with all relevant standards set out in the 'National Quality Standards for Residential Care Settings for Older People in Ireland' published by the Health Information and Quality Authority (2009) or the relevant standards for any subsequent national guidelines.*

A nursing home would be located close to commercial and community facilities in the village of Straffan i.e shop, café, churches, GAA etc. It would be easily accessible for residents, employees, visitors and service providers.

Settlement Strategy

Straffan is identified as a **Village** in the Settlement Strategy (5th tier in the hierarchy).

Zoning Objective

The subject lands are zoned '**Q (Enterprise and Employment)**' the objective of which is "To promote the development of employment generating uses".

Under Table 2.4, Land Use Zoning Objectives, it states that "*The purpose of this zoning is to promote the development of local employment. Permissible uses may include enterprise and incubator units, small scale industry and workshops. Uses will be considered on the merits of each planning application. Any proposal within this zone should have regard to the character of the village and of neighbouring uses*".

Under Table 2.6 (Land Use Zoning Matrix) a 'Nursing Home' is **Not Permitted**.

The Village Plan map show that the site:

- is within 400m of the village centre,
- is in an area where a flood risk assessment is required.

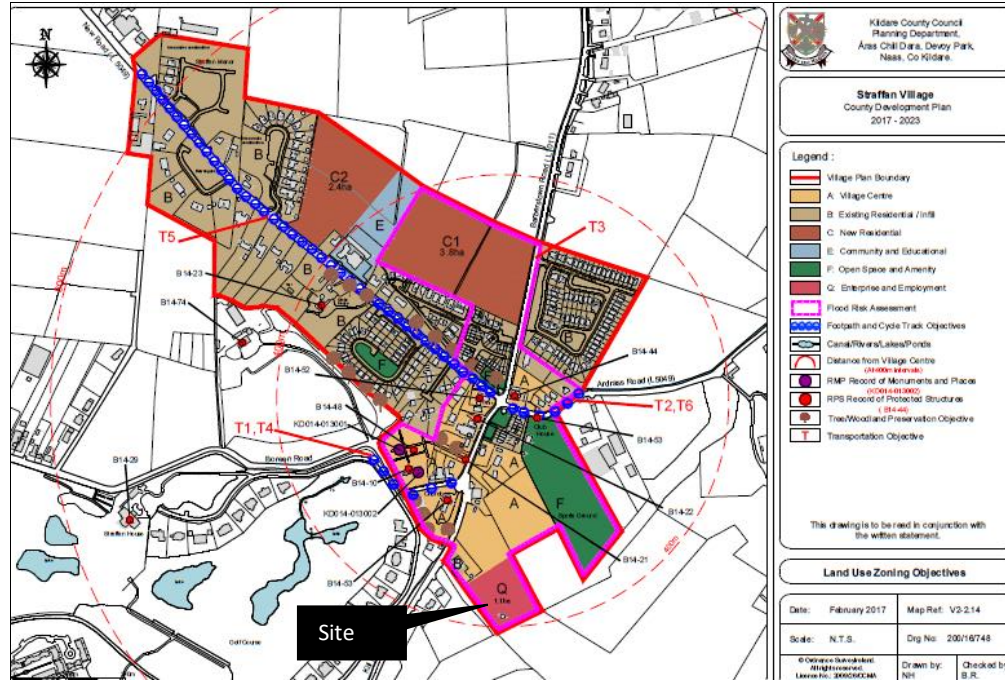


Fig No.7 Straffan Village Zoning Map (Map V2-2.14, Kildare CDP 2017-23).

5.0 RELEVANT RESEARCH

5.1 CBRE, 2020

In July 2020 CBRE published an article entitled 'Shortage of Nursing Homes Expected to Become More Acute'⁴. The article noted that CBRE Healthcare have undertaken a comprehensive analysis of Ireland's existing nursing home stock as well as looking to the supply line of new nursing homes that are currently at various stages of the planning process. They concluded that:-

"Ireland is currently severely undersupplied in terms of good quality nursing homes - a situation that is likely to worsen post Covid 19. To keep pace with our ageing population, we need 7,500 new nursing home beds to come into the system by 2026, but the reality is that only 935 new beds have been delivered in recent years and there is very little expected to be built in the next few years other than the 1,144 beds which are on site.

To add to this, post Covid 19, some nursing home beds may be lost to the system as smaller homes struggle to survive. A combination of rising building costs and the 2016 Standards being enforced by HIQA may severely impact the viability of some new developments. Supply and demand equilibrium is likely to be out of kilter for some time, and this is not good news for elderly care".

⁴ <https://www.cbre.ie/en/about-cbre/newsroom/articles/2020/shortage%20of%20nursing%20homes%20expected%20to%20become%20more%20acute>

6.0 DRAFT KILDARE COUNTY DEVELOPMENT PLAN 2023-29

6.1 Straffan

Straffan remains as Village status under the dKCDP 2023-29 and the site remains zoned for Enterprise and Employment under the Straffan Village Zoning Map.

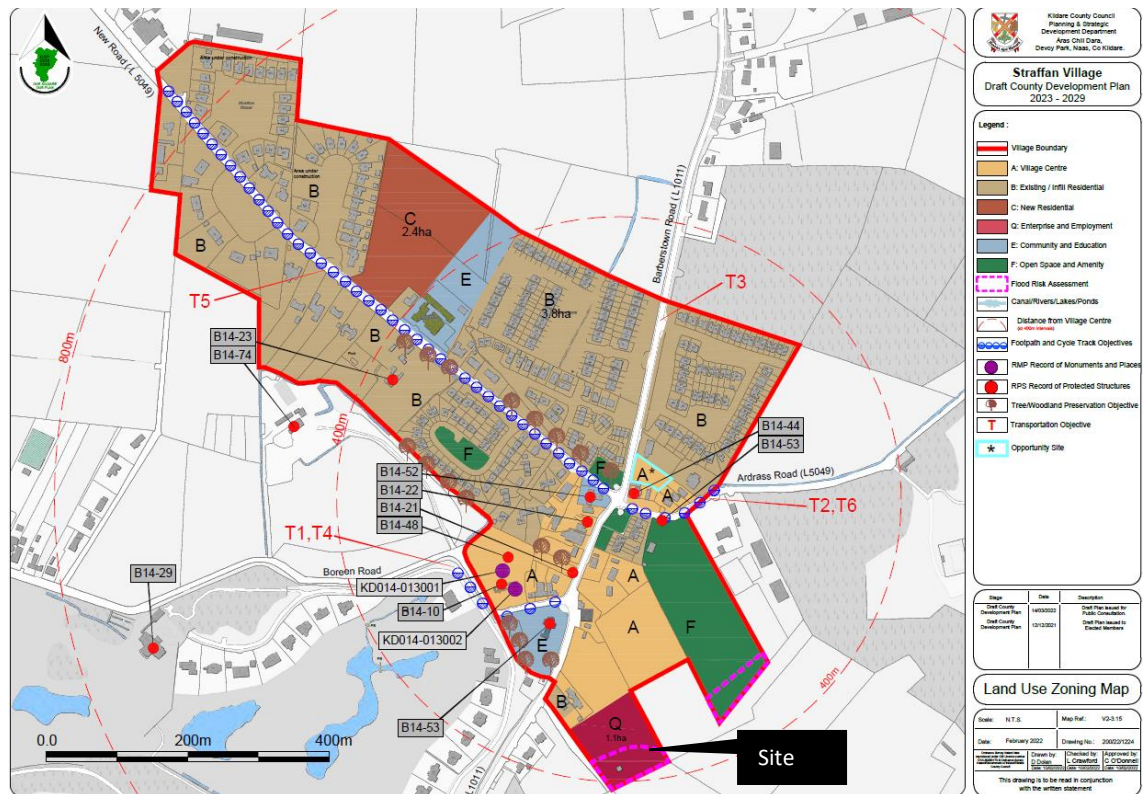


Fig No.8 Extract from the Straffan Village Zoning Map in the dKCDP 2023-29.

The policies and objectives concerning the need for nursing homes arising out of demographic patterns remains the same as that in the current KCDP.

We note that the southern portion of the site is subject to a flood risk proposal but we submit that this did not arise as an issue of concern on the recent application for a nursing home on the site. In fact there were no technical issues arising - the sole issue was the material contravention of the zoning objective.

7.0 SUBMISSION

7.1 Aim

This submission aims to ensure that a nursing home is a permissible land use on the subject site under the new KCDP.

This could be achieved by simply allowing Nursing Home to be permissible under the Q zoning objective.

Alternatively the lands could be rezoned for **Community and Educational ('E')** with a specific objective for **nursing home**. This approach has previously been adopted in the Newbridge LAP 2013 -19 (as extended) where a E2 designation was applied and we consider it to be the optimum choice.

Alternatively, we submit that a **new Q1 zoning objective** could be introduced to the new KCDP in the same manner that was done for Johnstown Garden Centre i.e. Q1 zoning objective under the current KCDP. 'Nursing Home' could be added to the land use matrix for Enterprise and Employment Q2 Zoning Objective given it is a significant employment generator.

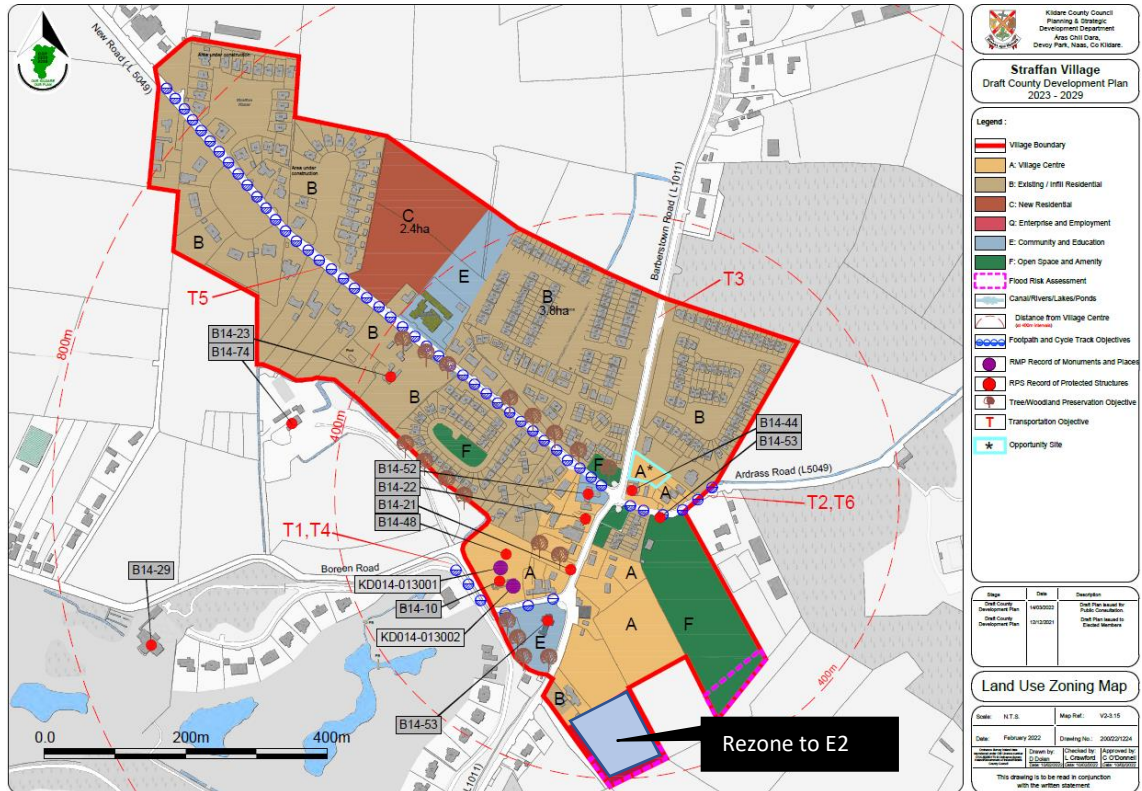


Fig No. 9 Straffan Village Zoning Map in the dKCDP 2023-29 adapted to show proposed new E2 Zoning Objective to facilitate Nursing Home use.

7.2 Compatibility

A nursing home land use would complement the adjoining residential land use to the north of the site.

7.3 Planning Gain

It is submitted to the Council that a nursing home development on this site would:

- Provide a **vital residential healthcare facility** for a cohort of the population that is rapidly expanding and generating a strong demand for such facilities.
- Generate **significant employment opportunities** in the village and hinterland, where currently there is a lack of such opportunities, and encouraging the need to avoid long commutes - **c.95-130 jobs**.

- Generate an **economic spin-off for other services** in the village including the shop, café, hotel and public house.

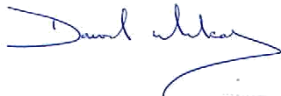
7.4 Loss of Employment Zoning

We note that this site has remained zoned 'Q' for the past two development plans **without attracting any employment uses** which strongly suggests that there is no demand for this zoning objective or it is in the wrong location.

In the event that the Council are concerned about the loss of the Q zoning objective in the village we submit that there **other suitable locations** around the edge of the village to accommodate a similar type zoning.

We trust the Council will give this submission serious consideration. We consider that a zoning objective which facilitates a nursing home on this site would accord with the proper planning and sustainable development of the area.

Signed:



David Mulcahy

David Mulcahy Planning Consultants Ltd

CHARTERED PLANNING CONSULTANTS

Encl Report from Conor Furey Associates addressing flood risk.