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SUBMISSION

to

DRAFT KILDARE COUNTY DEVELOPMENT PLAN 2023-2029

concerning lands at

KILL EAST, KILL, CO. KILDARE

Client: Mark Grainger

Xth May 2022

EXECUTIVE SUMMARY

David Mulcahy Planning Consultants Ltd, have been instructed by **Mark Grainger** to prepare a submission to the draft Kildare County Development Plan 2023-29 concerning lands measuring c.1.02 hectares at Kill East, Kill, Co. Kildare.

The lands in question are owned entirely by Mark Grainger in a **single landholding**.

At present the subject lands are **greenfield in nature** and are outside the development plan boundary for Kill under the KCDP 2017-23.

The draft KCDP 2023-29 again excludes these lands from the boundary and they are effectively deemed agricultural.

This submission will demonstrate to the Council that the subject lands **should be designated for Serviced Sites**.

The serviced sites will provide a viable alternative to persons who meet local needs criteria but cannot obtain planning permission for a dwelling.

It is further submitted that **all lands east of the N7 should be zoned**, including the subject lands.



OS Map adapted to show indicative new zoning objectives under this submission, along with suggested Serviced Sites for the subject lands.

1.0 INTRODUCTION

David Mulcahy Planning Consultants Ltd, have been instructed by **Mark Grainger** to prepare a submission to the draft Kildare County Development Plan 2023-29 concerning lands measuring c.1.02 hectares at Kill East, Kill, Co. Kildare.

At present the subject lands are greenfield in nature and are outside the development plan boundary for Kill under the KCDP 2017-23. The draft KCDP 2023-29 again excludes these lands from the boundary and they are effectively deemed agricultural.

This submission will demonstrate to the Council that the subject lands should be designated for **Serviced Sites**.

Note: All maps are orientated due north.

2.0 CONTEXT

2.1 Location

The subject site is located north of the M7 on the west side of the Straffan Road - see Fig No.1 below.



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

2.2 Description

The subject lands measure approximately 1.03 hectares. The lands are greenfield in nature and contain mature hedgerows around the perimeter. The subject lands and the wider lands to the north of the N7 are connected to Kill village via a pedestrian overpass on the N7.

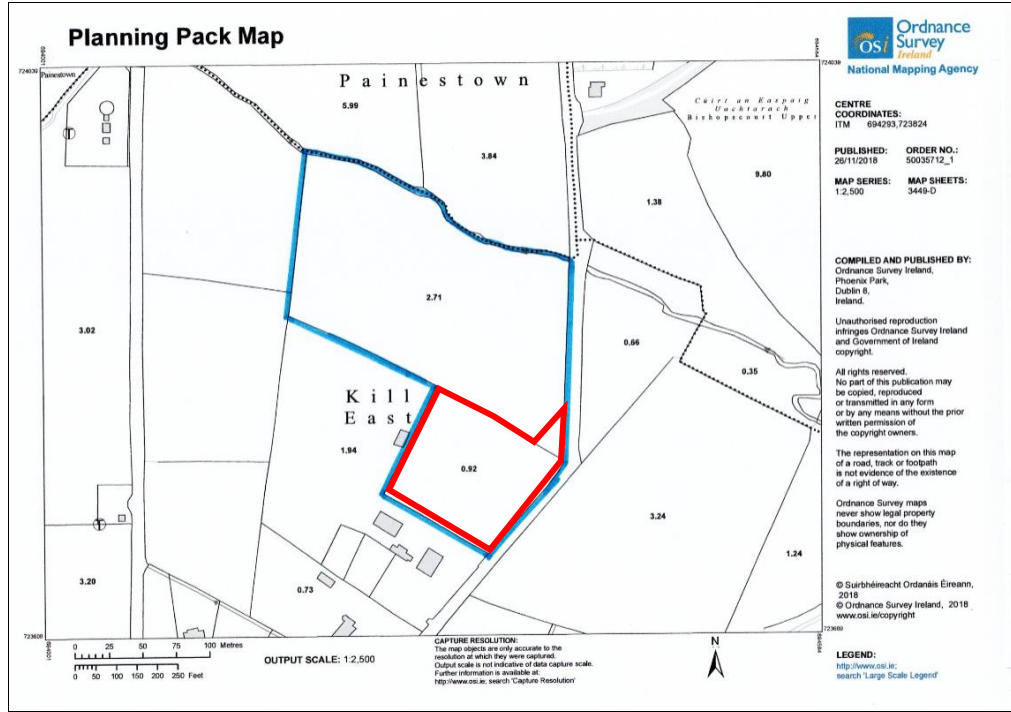


Fig No.2 Location of site outlined in red with wider lands owned by Mr. Grainger outlined in blue.

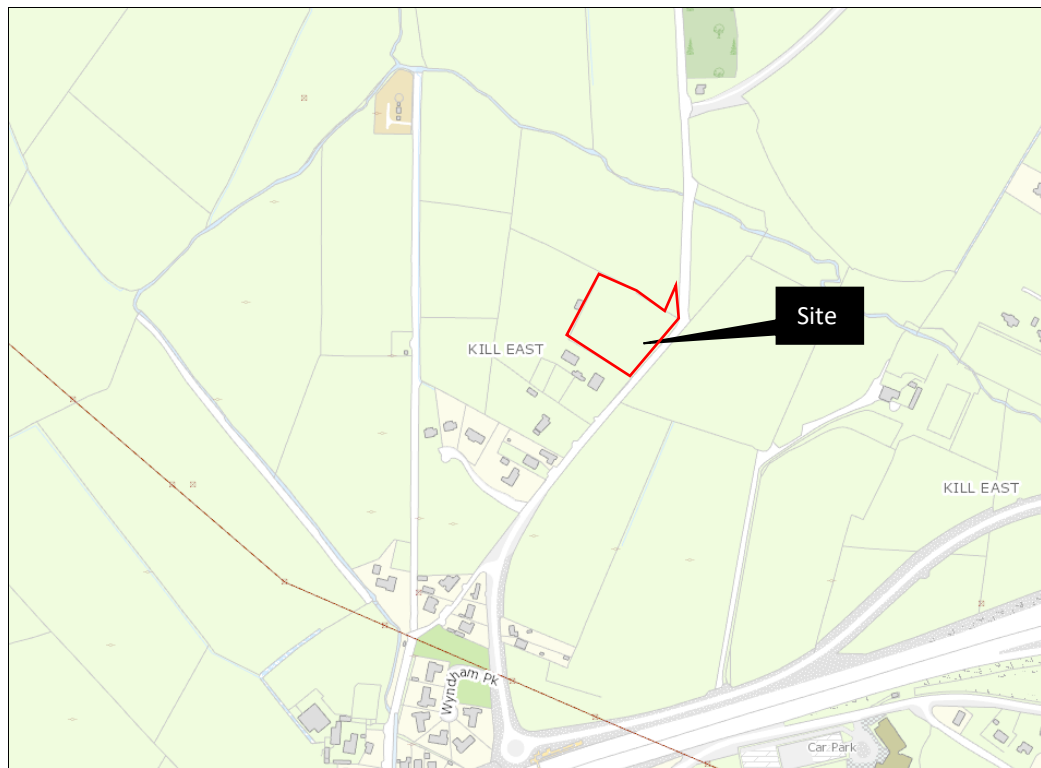


Fig No.3 Site Context Map (source: Myplan.ie - OSI Licence No.EN 0080915).



Fig No.3 Satellite image of the site (source: March 2022).

2.3 Ownership

The applicants own the site¹ in its entirety.

2.4 Adjoining Land Uses

North:	Agricultural land
South:	Residential dwelling
West:	Builders yard
East:	Straffan Road

¹ Southern portion of Folio Ref KE1835 and southern portion of KE1836 (same as planning application under Reg. Ref. 22/290).

2.5 Built and Natural Heritage

There are no known built or natural heritage constraints associated with the subject.

2.6 Flood Risk

The subject site is elevated and there is no flood risk associated with same based on a review of floodinfo.ie.

2.7 Services

Refer to map from Irish Water enclosed which shows showing Kill Foul Pumping Station near the subject site.

2.8 General Area

The subject lands adjoin a **developed area north of the N7** which consists mainly of residential land uses, along with some industrial and some amenity facilities (football pitches). The **majority** of this development land is **within the CSO Boundary** for the town of Kill, yet for some strange reason is not zoned and therefore in effect is deemed to be primarily agricultural.

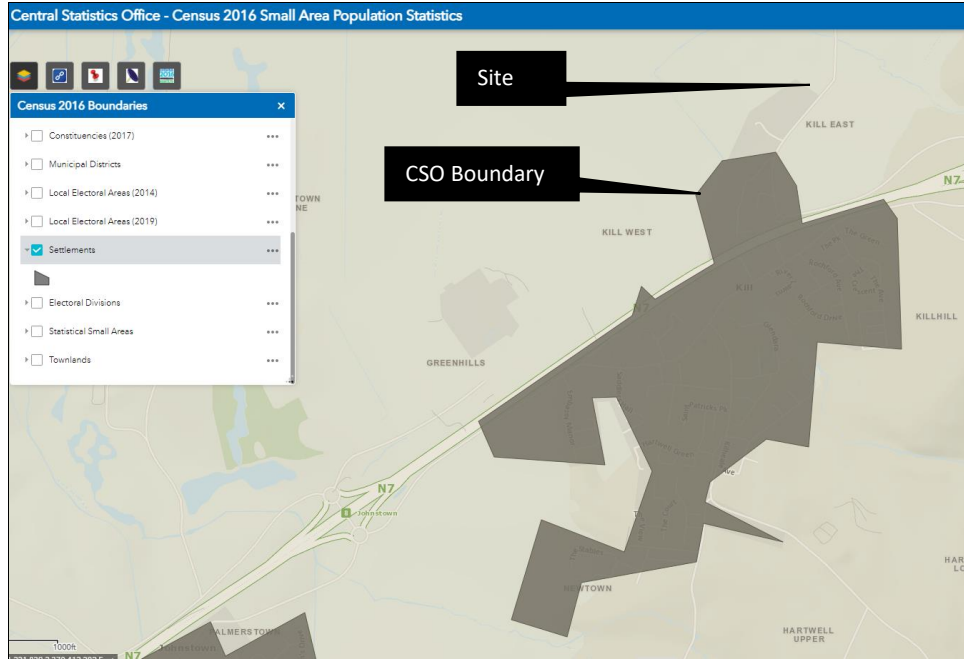


Fig No.4 Extract from CSO Mapping showing the majority of developed lands north of the N7 to be within the CSO Boundary for the town.

There is significant pressure for one-off housing in the general hinterland with many applications being refused in recent times due to the absorption capacity of the area being reached and/or the need to protect lands around urban areas from such development.

3.0 PLANNING HISTORY

3.1 Subject Lands

There is a planning history associated with the subject lands based on a review of the Kildare on-line planning enquiry system. It relates to applications for a **one-off house** by Mr. Grainger which have all been refused, despite his meeting all local needs criteria, on account of the impact of such development on the future orderly development of the town of Kill.

4.0 PLANNING CONTEXT

4.1 National Framework Plan 2040

The NPF is based on a projection of a 5.7 million people population by 2040 which is used as a benchmark against which the strategy is placed. This benchmark provides for one million additional people, 660,000 additional jobs and 550,000 new homes by 2040 (or **25,000 houses to be built each year**).

50% of the national population growth should happen in the Eastern and Midlands (EMRA) Region and 50% of this population growth should happen within the City of Dublin and its suburbs. This represents significant housing growth in the EMRA Region up to 2040 which includes Co. Kildare.

National Policy Objective 11

In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth – emphasis added

4.2 Housing For All - a New Housing Plan for Ireland, 2021

On the 3rd September 2021 the government unveiled the Housing for All - a New Housing Plan for Ireland. The government's vision for the housing system over the longer term is to achieve a steady supply of housing in the right locations with economic, social and environmental sustainability built into the system.

It is estimated that Ireland will need an average of 33,000 new homes to be provided each year from 2021 to 2030.

The policy has four pathways to achieving housing for all:

1. supporting home ownership and increasing affordability
2. eradicating homelessness, increasing social housing delivery and supporting social inclusion
3. **increasing new housing supply**
4. addressing vacancy and efficient use of existing stock

4.3 ERSI: Regional demographics and structural housing demand at a county level

On 14th December 2020 the ESRI published a new report, funded by the Department of Housing, Local Heritage and Government, which provides estimates of the amount of housing needed based on projected population growth at a local authority level out to 2040.

The report estimates future housing demand, based on the number of new households formed. In the 'business as usual' scenario around **28,000 new houses per annum** over the medium term just to keep up with the demand generated by population growth. In a high international migration scenario, that figure would be closer to **33,000 new houses a year**, whereas in the low migration scenario the figure would be above 26,000 a year.

The report notes that at a regional level, in the baseline scenario, the Eastern² and Midlands region is expected to experience the fastest population growth and to capture the majority (55.6 per cent or 514,000 people) of the total expected population growth over the 2016 to 2040 period:- *“Within this region, Dublin is expected to continue have the highest population share, although the Mid-East region, the area surrounding Dublin, is likely to experience the fastest population growth”.*

² County Kildare is located in the Eastern Region.

Relative to their population shares, the research expects “*higher levels of housing demand in Dún Laoghaire-Rathdown, Cork City, Meath and **Kildare** and relatively lower levels of demand in Mayo and Fingal*” - bold text emphasised.

4.4 Sustainable Urban Residential Development Guidelines, 2009

The Guidelines advise that **smaller towns** and villages are defined as those with a population ranging from 400 to 5,000 persons. The Guidelines advise for these smaller towns that:

- *Development of acceptable “green-field” sites at suitable locations within the immediate environs of the small town is encouraged.*
- *Increased densities of development can be acceptable as long as they contribute to the enhancement of town or village form by reinforcing the street pattern or assisting in the redevelopment of **backlands**. In all cases, special care will be required to protect the architectural and environmental qualities of small towns and villages of special character.*
- *In some limited circumstances, notably where pressure for development of single homes in rural areas is high, proposals for **lower densities** of development may be considered acceptable at locations on serviced land within the environs of the town or village in order **to offer people, who would otherwise seek to develop a house in an unserviced rural area**, the option to develop in a small town or village where services are available and within walking and cycling distance.*

4.5 Regional Spatial and Economic Strategy for the Eastern and Midland Region, ('RSES') 2019

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.

County Kildare is located in the Eastern Region.

The following elements of the RSES are considered relevant:

Settlement Strategy - Small towns, villages and rural areas

Support the sustainable growth of rural areas by promoting the regeneration and revitalisation of rural towns and villages coupled with investment where required to support local employment and services and targeted rural housing policies to be determined by local authorities.

Regional Strategic Outcome: Compact growth and Urban regeneration

Promote the regeneration of our cities, towns and villages by making better use of under-used land and buildings within the existing built-up urban footprint and to drive the delivery of quality housing and employment choice for the Region's citizens (NSO 1).

4.6 Kildare County Development Plan 2017 – 2023

4.6.1 Kill Small Town

The subject site is outside the development boundary of the village.

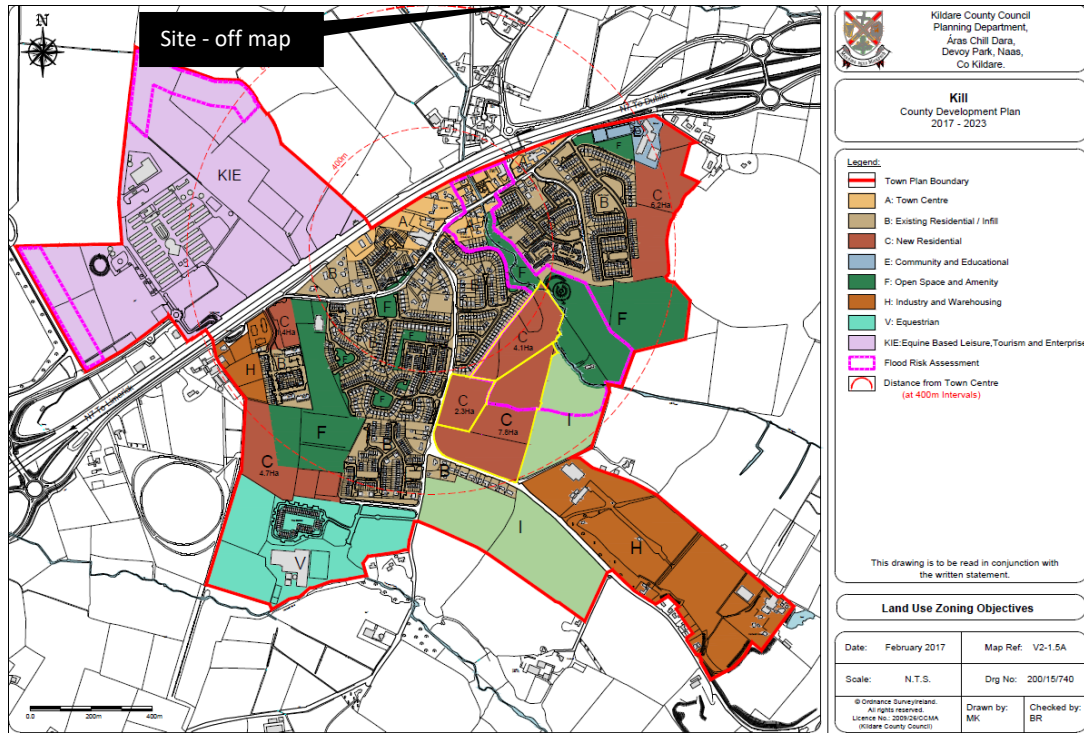


Fig No.5 Kill zoning map showing site outside zoned lands.

5.0 DRAFT KILDARE COUNTY DEVELOPMENT PLAN 2023-29

5.1 Settlement Strategy

Kill remains designated as a **Small Town**

The draft Plan notes that:

- The population for Kill was recorded as 3,348 (2016 Census³) an increase of 8.2% from 2011 (3,095).
- Kill is connected to the ULVSS (Osberstown WWTP) with additional capacity of 37,450 PE.

5.2 Designations

Under the draft KCDP the subject site is again outside the rural settlement boundary.

³ Not updated Census due to Covid 19.

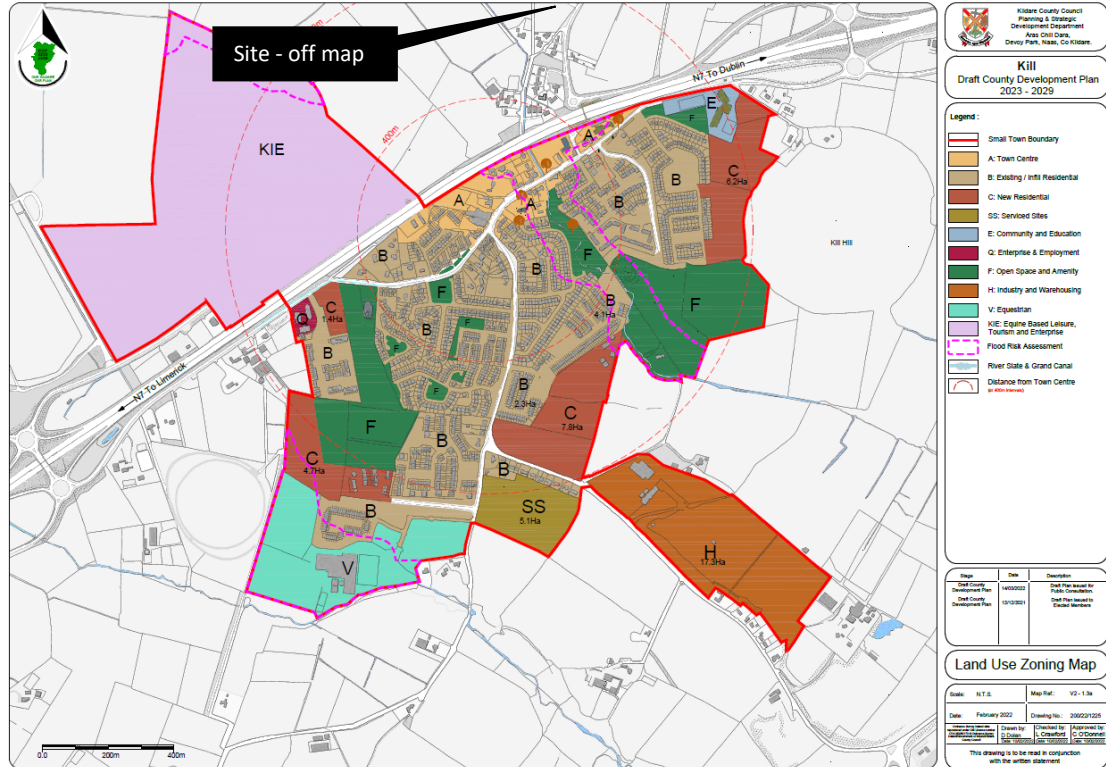


Fig No.6 Zoning Map dKCDP 2023-29 showing lands outside the town boundary. **Serviced Sites**

5.3 Sustainable alternative to One Off Housing

Section 3.13.7 of the draft CDP deals with 'Providing a sustainable alternative to One Off Housing'

It states that it is **“a priority of this plan”** to put the policy provisions in place to implement this objective, by providing a **model for serviced sites** in established communities, as a sustainable alternative to one of housing in the open countryside. It is envisaged that the establishment of a **“County Kildare Serviced Sites Initiative”** will attract new residents in to live in our villages and sustain the communities and economies of these areas.

Policies

It is the policy of the Council to:

HO P22 **Promote and facilitate the provision of sustainable alternatives to one off housing** through the designation of lands specifically for serviced sites across a series of villages and rural settlements in County Kildare.

HO P23 notes that no development shall take place on sites designated “Serviced Sites” until such time as the KCC Serviced Sites Initiative Scheme is agreed by the Elected Members of Kildare County Council.

HO O55 seeks to ensure that that the development of any serviced sites;

- Adequately addresses infrastructural requirements, including water, wastewater and surface water drainage as well as footpaths and lighting which shall link with the respective town/village/rural settlement
- Provide for small scale housing developments (no more than 10 units per hectare)
- Include a Design Statement for the overall site to inform the design, mix and type of the proposed dwellings
- Include a clear timeframe for the delivery of the required infrastructure to service the development proposed

HO A8 Prepare a Kildare County Council Serviced Sites Scheme Policy Document to guide the development of serviced sites, no later than 6 months after the adoption of this Plan.

The draft KCDP shows provision for **5.1 hectares** of lands on the south side of the town to be designated for Serviced Sites. It is submitted that this zoning seems relatively small given the high demand and pressure for one-off housing in the surrounding area on both sides of the N7.

6.0 SUBMISSION

6.1 Introduction

The planning status of the site can be summarised as follows:

- National and regional planning strategies promote compact urban settlements with an emphasis on developing lands close to town centres for residential development.
- The site is located outside the town boundary for Kill in the Kildare CDP 2017-23 and again in the draft Kildare CDP 2023-29, although it directly adjoins developed lands much of which are in the CSO boundary for the town.
- The surrounding hinterland is under pressure for one-off houses and a viable alternative is required in order to attract such persons into villages.
- There are no known built or natural heritage constraints associated with the land, or flood risk.

6.2 Submission

6.2.1 Aim

This submission seeks for **all developed lands west of the N7 in Kill to be zoned** to reflect the land uses on the ground and for the subject site to be designated for **Serviced Sites**.



Fig No.7 OS Map adapted to show indicative new zoning objectives under this submission, along with suggested Serviced Sites for the subject lands.

6.2.2 Precedent

The principle of zoning lands on the opposite side of a national road, dual carriageway or motorway is well established in the Kildare County Development Plan 2017-23 and again in the 2023-29 draft. Examples includes Johnstown Garden Centre to the south of Kill, industrial lands to the south of Maynooth and residential and leisure zonings south of Kilcock.

6.2.3 Planning Gain

The development of the site for Services Sites would provide much needed homes in a current housing crisis.

It would provide a viable alternative for persons who qualify for local needs in the hinterland area of Kill but are struggling to obtain planning permission for dwellings as the absorption capacity is largely saturated.

6.2.4 Access

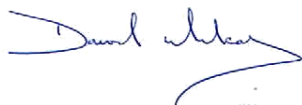
Please refer to the traffic report from TPS Ltd attached with this submission relating to a previous application for one-off house at this location demonstrating that safe vehicular access can be achieved.

Conclusion

We trust that the Council will afford this submission serious consideration. We consider that this proposed zoning for Serviced Sites along with the zoning of the wider developed area north of the N7 would be consistent with the proper planning and sustainable development of the area.

Note: Mr. Grainer would be open to his adjoining lands to the north, outlined in blue in figure No.2, also being zoned for Serviced Sites, if the Council were in support of same. We submit that limiting the amount of Serviced Sites in any settlement to one site only risks impacting on the cost of such sites and two or more sites will increase competition which is more likely to drive down the cost of such sites for potential purchasers.

Signed:



David Mulcahy

David Mulcahy Planning Consultants Ltd
CHARTERED PLANNING CONSULTANTS

Encl. Map from Irish Water showing Kill Foul Pumping Station near the subject site.

Separate Enclosure - traffic report from TPS Ltd relating to previous application for one-off house at this location demonstrating that safe vehicular access can be achieved.

