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SUBMISSION

to

DRAFT KILDARE COUNTY DEVELOPMENT PLAN 2023-2029

concerning lands at

BALLYMORE EUSTACE, CO. KILDARE

Client: Joe & Ann Headon

23rd May 2022

EXECUTIVE SUMMARY

David Mulcahy Planning Consultants Ltd, have been instructed by **Joe & Ann Headon** to prepare a submission to the draft Kildare County Development Plan 2023-29 concerning lands measuring **c.7 hectares** at Ballymore Eustace, Co. Kildare.

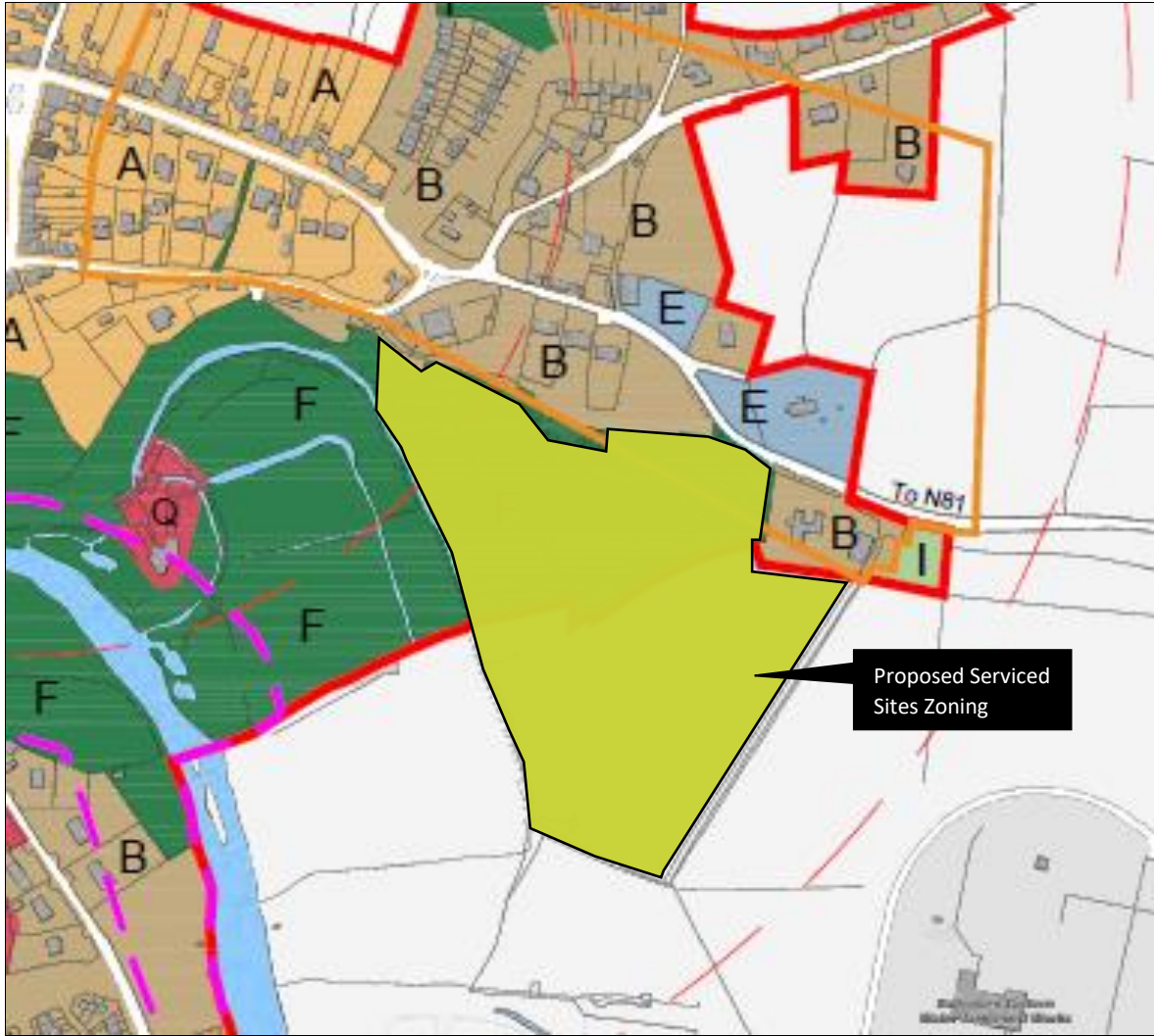
The lands in question are owned entirely by Joe Headon in a single landholding.

A report from Donnacadh O'Brien Consulting Engineers demonstrates that the lands are serviceable.

A desk-top archaeological assessment reveals no items of note associated with the landholding.

At present the northern portion of the subject lands are greenfield in nature and zoned Agriculture ('I') in the KCDP 2017-23. The draft Plan 2023-29 shows the northern portion of the lands to be zoned Open Space & Amenity. This submission will demonstrate to the Council that the subject lands should be zoned for Serviced Sites in their entirety.

In addition to providing much needed housing, planning gain will be achieved in the form of an enhanced public footpath to the north, with lighting and opening up of the attractive woodlands (which are currently in private ownership) to the village.



Proposed changes to dKCDP 2023-29 Zoning Map being sought under this submission

1.0 INTRODUCTION

David Mulcahy Planning Consultants Ltd, have been instructed by Joe & Ann Headon to prepare a submission to the draft Kildare County Development Plan 2023-29 concerning lands measuring c.7 hectares at Ballymore Eustace, Co. Kildare.

The lands in question are owned entirely by Joe & Ann Headon in a single landholding.

At present the northern portion of the subject lands are greenfield in nature and zoned **Agriculture ('I')**. The draft Plan shows the northern portion of the lands to be zoned Open Space & Amenity. This submission will demonstrate to the Council that the subject lands should be zoned for **Serviced Sites** in their entirety.

In addition to providing much needed housing, planning gain will be achieved in the form of an enhanced public footpath to the north, with lighting and opening up of the attractive woodlands (which are currently in private ownership) to the village.

Note: All maps are orientated due north.

2.0 CONTEXT

2.1 Location

The subject lands are located to the south-east of Ballymore Eustace village¹ approximately **420m** from the village centre, south of the L2025 - see Fig. No.1 below.



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

¹ Within the Townlands of Ballymore Eustace East (northern portion) and Bishopslane (southern portion).

2.2 Description

The subject site² measures c.7 hectares and is greenfield in nature (consisting of 2 no. agricultural fields). The site is enclosed by mature hedgerow and it contains a centrally located hedgerow. The western and southern portion of the site consists of woodland.

Access to the site is currently via an agricultural access on the L2025.



Fig No: 2 Map showing the subject site along with additional lands owned by the applicant in blue (source: Myplan.ie - OSI Licence No.EN 0080915).

² Folio ref: folio KE65071F (1.36ha), the majority of KE6538 (4.43ha less the area where the dwelling is located) and KE65071F (1.59ha).



Fig No: 3 Satellite image showing subject site (source: Google Earth Pro, March 2018).

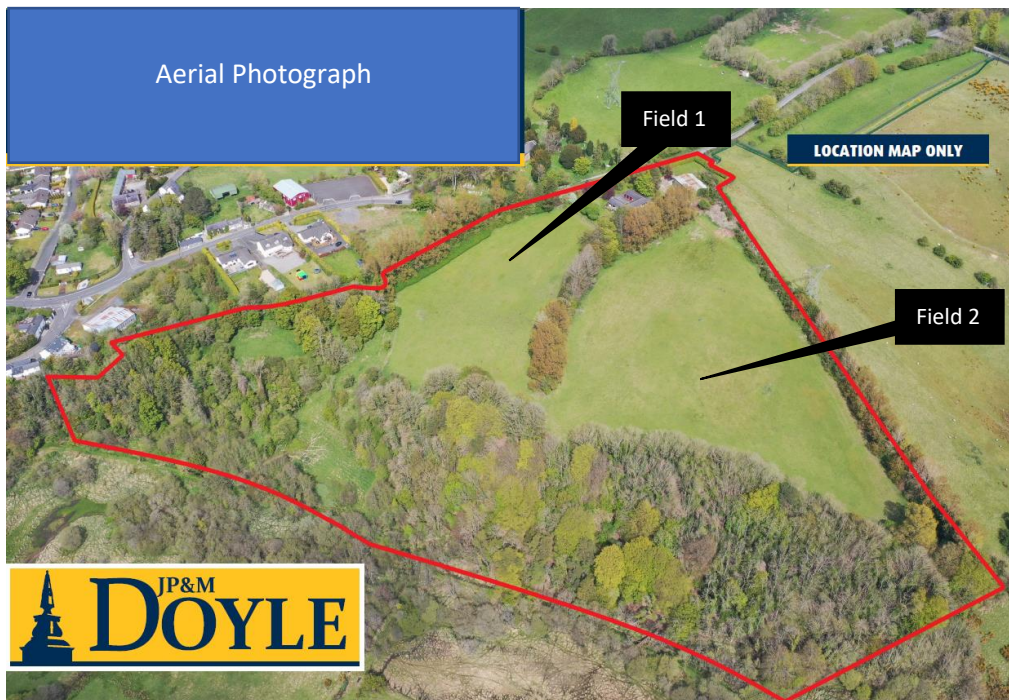


Fig No.4 Aerial photograph of the subject site (including adjoining dwelling) - source JP&M Doyle, Sales Agent Brochure.

2.3 Adjoining Land Uses

North	The L2025 runs along the northern boundary of the site. The site is entirely within the 50kph posted speed limit. There is a pedestrian route connecting the site back into the village (Pudding Lane). There is no public lighting.
South	The lands to the south are undeveloped and consist of woodland with agricultural fields beyond.
East	There is a dwelling to the north east (owned by Mr. Headon ³). The remainder of the lands to the east are agricultural.
West	The lands to the south are undeveloped and consist of woodland with agricultural fields beyond.



Fig No.5 Northern boundary of the site showing posted speed limit sign and pedestrian route back into the village.

³ Eircode: W91T8K0

2.4 Services

The site is serviceable - please refer to the **engineering report prepared by Donnachadh O'Brien Consulting Engineers enclosed** which accompanies this submission.

2.5 Archaeology

The Historic Environment Viewer is an on-line digital service provided by the Department of Culture, Heritage and the Gaeltacht providing databases of the National Monuments Service Sites and Monuments Record (SMR) and the National Inventory of Architectural Heritage (NIAH). It shows no recorded monuments associated with the subject lands but the very northern portion of the site is within a zone of archaeological potential. On this basis it was deemed prudent to obtain a desk-top archaeological assessment by **Dr. Charles Mount** - see copy **enclosed** with the submission. This report concludes that there are no findings of archaeology associated with the subject site but test trenching of the site is recommended prior to any potential future development.

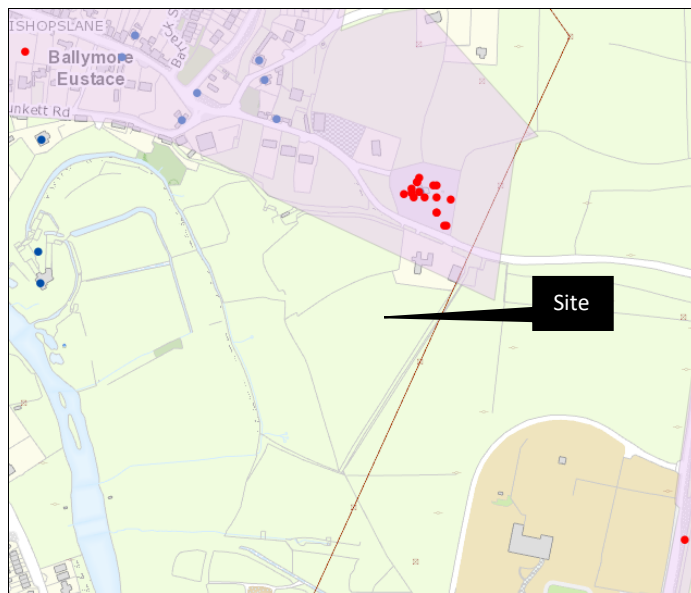


Fig No.6 Extract from the Historic Environment Viewer.

2.6 Ecology

There are no ecological designations in the vicinity of the subject site (i.e. pNHA, NHA, Natura 2000 etc).

2.7 Ballymore Eustace

The population for the village was recorded as 873 in the 2016 Census⁴ (most recent Census) an increase of 1 from 2011 (872). The Housing Stock was recorded as 372 houses, of which 331 were occupied and 41 were vacant.

Water is supplied by the Ballymore Eustace WTP, which is located close to the village. The draft CDP notes that Ballymore Eustace has an adequate water supply to meet the current demands and the future planned growth over the life of this Plan. Ballymore Eustace is serviced by the Ballymore Eustace WWTP and the draft CDP notes that the plant has spare capacity for 1,185(PE).

There is a lot of one-off housing around the village and surrounding area and the demand for the off-spring of these families is likely to increase the pressure for one-off dwellings.

3.0 PLANNING HISTORY

3.1 Subject Lands

A review of the Kildare County Council on-line planning enquiry system revealed **no relevant planning applications** associated with the subject site.

⁴ There has been no updated from the 2016 Census due to Covid 19.

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.*

National Policy Objective 18b

*Develop a programme for 'new homes in small towns and villages' with local authorities, public infrastructure agencies such as Irish Water and local communities to **provide serviced sites** with appropriate infrastructure **to attract people to build their own homes and live in small towns and villages.***

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 Eastern⁵ 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”.*

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

⁵ County Kildare is located in the Eastern Region.

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.

In relation to Development within **Smaller Towns** and Villages Circular letter **NRUP 02/2021** points out that the Sustainable Residential Development in Urban Areas - Guidelines for Planning Authorities, DEHLG (2009) cautions against large scale, rapid development that may overwhelm and detract from the quintessential character of towns and villages that have developed slowly and organically over time, and furthermore, clarifies that there is **already clear scope for greater variation in density in smaller towns**, but that this should not lead to provision for disproportionate development in such places through excessive zoning.

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 Ballymore Eustace Village

Zoning Objective

The Ballymore Eustace zoning map shows the northern portion of the site to be zoned **Agricultural**. It is also within the **zone of archaeological potential** and in an area where **flood risk assessment** is required for any future planning application.

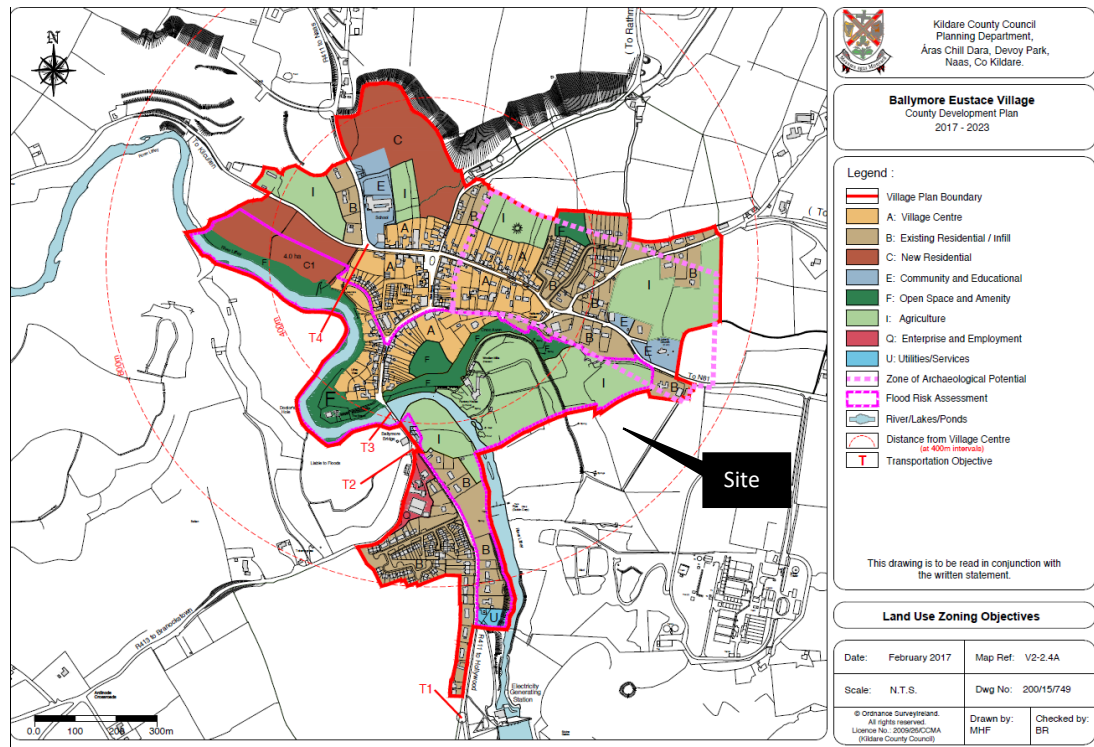


Fig No.7 KCDP 2017-23 Zoning Map for Ballymore Eustace showing top portion of the site zoned Agricultural ('I') and the remainder outside the village plan boundary.

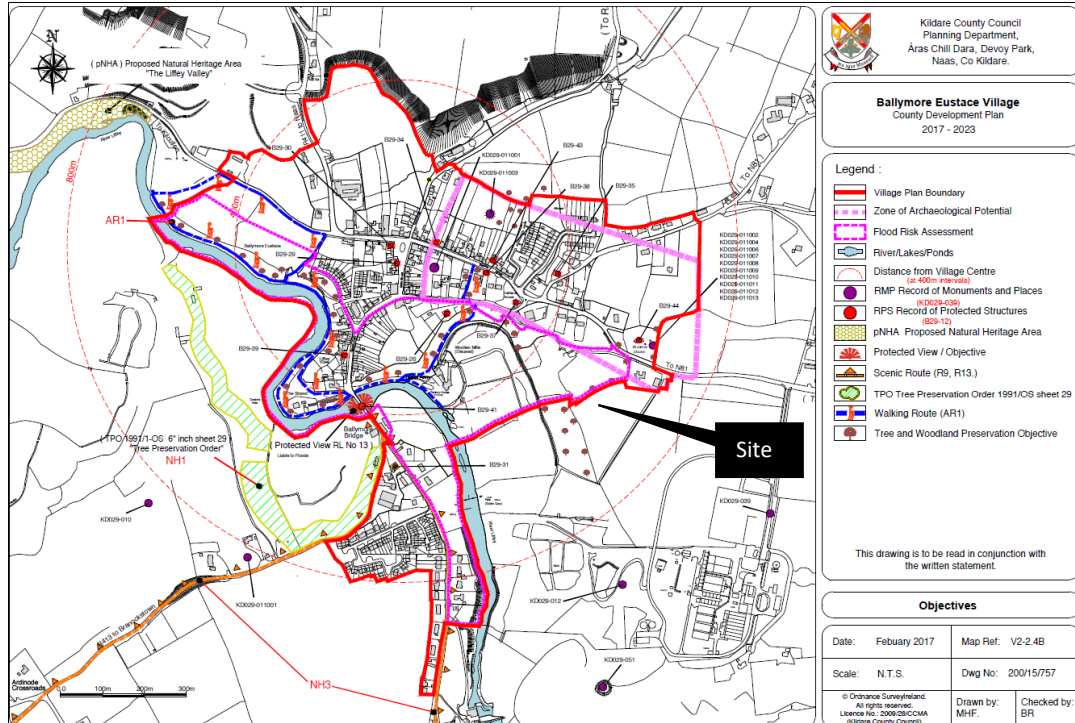


Fig No.8 Ballymore Eustace Objectives map, KCDP 2017-23.

5.0 DRAFT KILDARE COUNTY DEVELOPMENT PLAN 2023-29

5.1 Settlement Strategy

Ballymore Eustace remains designated as a **Village** under the dKCDP 2023-29.

The dKCDP 2023-29 also notes, inter alia, that:

- The village had a population 873 (2016 Census) an increase of 1 from 2011 (872)
- Water – Supplied by the Ballymore Eustace WTP, which is located close to the village. Ballymore Eustace has an adequate water supply to meet the current demands and the future planned growth over the life of this Plan.
- Wastewater – Ballymore Eustace is serviced by the Ballymore Eustace WWTP. The plant has spare capacity for 1,185(PE).

- The Dublin City bus route (no. 65) serves Ballymore Eustace and terminates at Eden Quay in Dublin City and provides a regular daily service.

5.2 Zoning Objective

Under the draft KCDP the northern portion of the site is zoned **Open Space and Amenity ('F')**.

The Objectives Map shows the northern portion of the site to be within the **zone of archaeological potential** and containing a **Tree & Woodland Preservation Objective**. The entirety of the site is **within 800m of the village centre**.

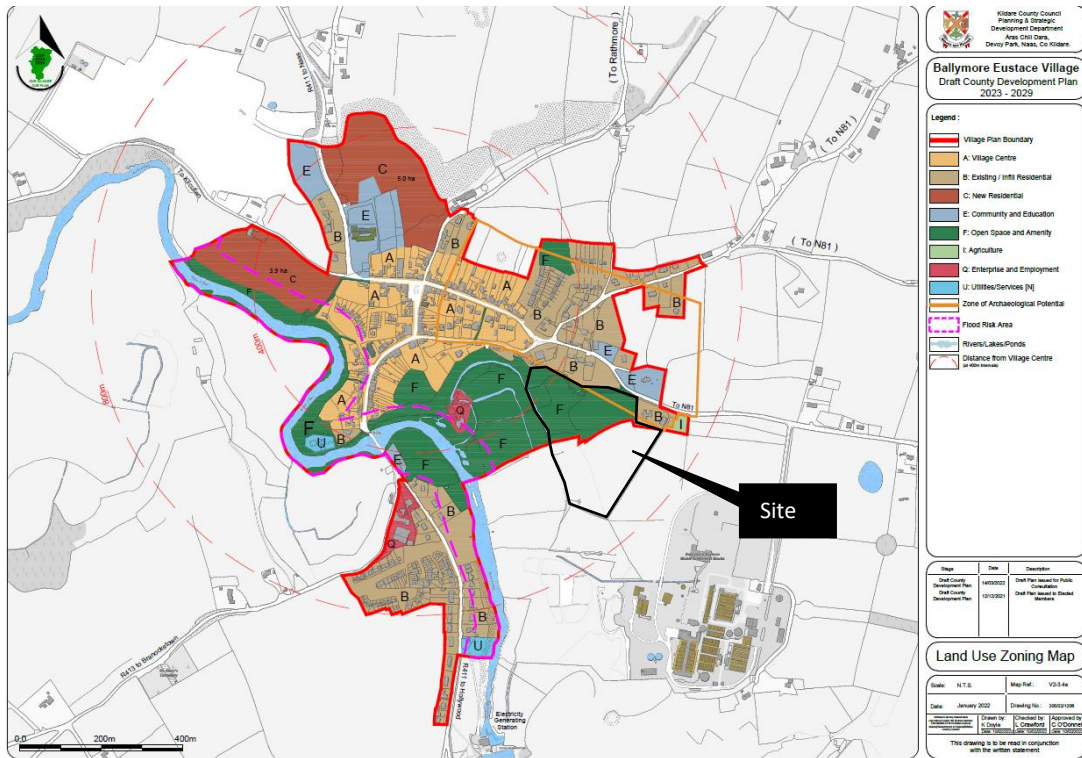


Fig No.9 Zoning Map dKCDP 2023-29 showing the northern portion of the site to be zoned Open Space and Amenity and the remainder to be located outside the village plan boundary.

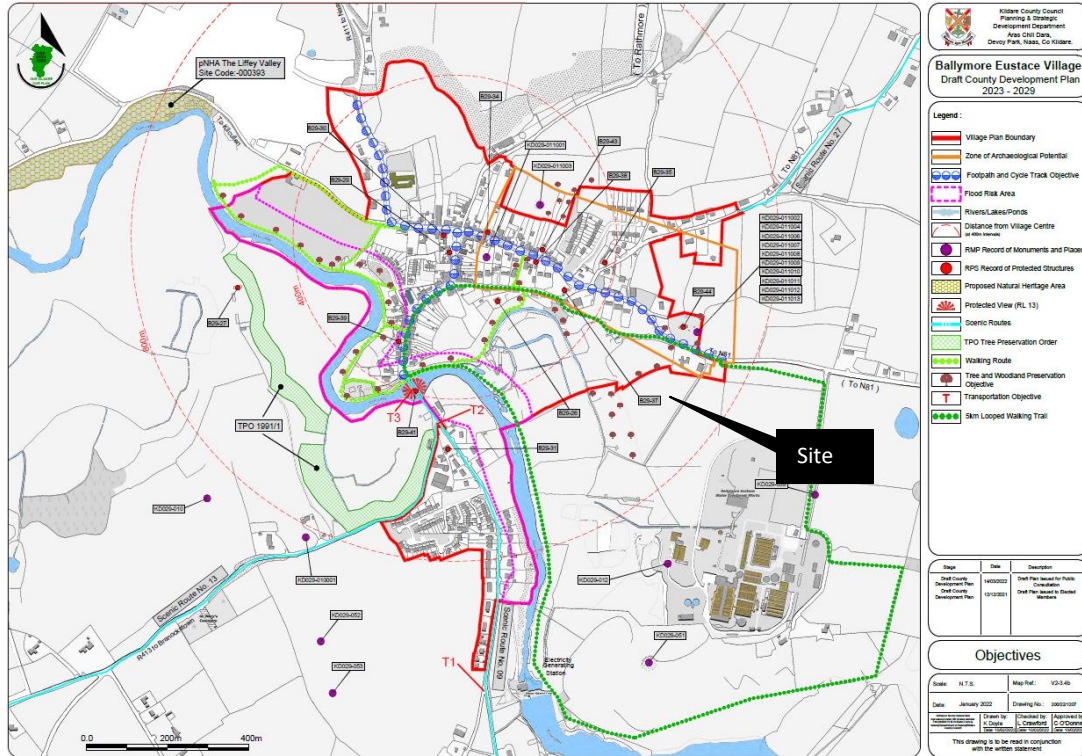


Fig No.10 Objectives Map dKCDP 2023-29.

5.3 Serviced Sites

The dKCDP 2023-29 notes the following:

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.

No land has been allocated for Serviced Sites in Ballymore Eustace unlike other Villages around the county - despite the fact that is located within an area that is under pressure for one-off housing and where viable alternatives are required.

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 in Ballymore Eustace which is a Village in the Kildare Settlement Strategy.
- The site is partly within the 800m radius from the village centre.
- The northern portion of the site is within the development plan boundary under the dKCDP 2017-23 and is currently zoned 'Agricultural'.
- There are no known built or natural heritage constraints associated with the land (subject to test trenching) or flood risk.
- The site is heavily wooded on the west side only.
- There is an established pedestrian access back into the village.
- The site is within the 50kph posted speed limit.
- Under the dKCDP 2023-29 the northern portion of the site is zoned Open Space and Amenity, despite being fully privately owned.

6.2 Submission

6.2.1 Aim

This submission seeks for the subject lands to be zoned for **Serviced Sites**.

This would involve expanding the development boundary; however, this has been done elsewhere under the dKCDP 2023-29 and is not considered to be a prohibitive.

Our client would also be open to a New Residential Zoning objective, or a combination of New Residential and Serviced Sites. We note that the 3.9ha site zoned New Residential is currently being built out.

6.2.2 Rationale

There are **no lands zoned for Serviced Sites in Ballymore Eustace** in the draft KCDP, unlike other villages around the county, despite significant pressure for one-off housing in the wider hinterland area.

The subject site presents as an **ideal location** for such sites given its location at the edge of the village in an area that would be screened from existing built-up area by a heavily wooded area which is likely to prove very attractive to rural persons looking to build in a rural setting.

This wooded area is currently in private ownership with no access to the public. It **would however become usable by future home owners and the wider village** if it formed part of a serviced site development.

6.2.3 Potential Constraints

In relation to the **Zone of Archaeological Potential** any future development of the site would be the subject of test trenching in advance of a planning application.

In relation to the **Tree & Woodland Preservation Objective** any future development of the site would be the subject of an arboricultural assessment in advance of a planning application. It is likely that the majority of the area to the west of the site would be left undeveloped with the tree remaining in situ.

6.2.4 Vehicular Access

The residential units would be accessed via the L2025.

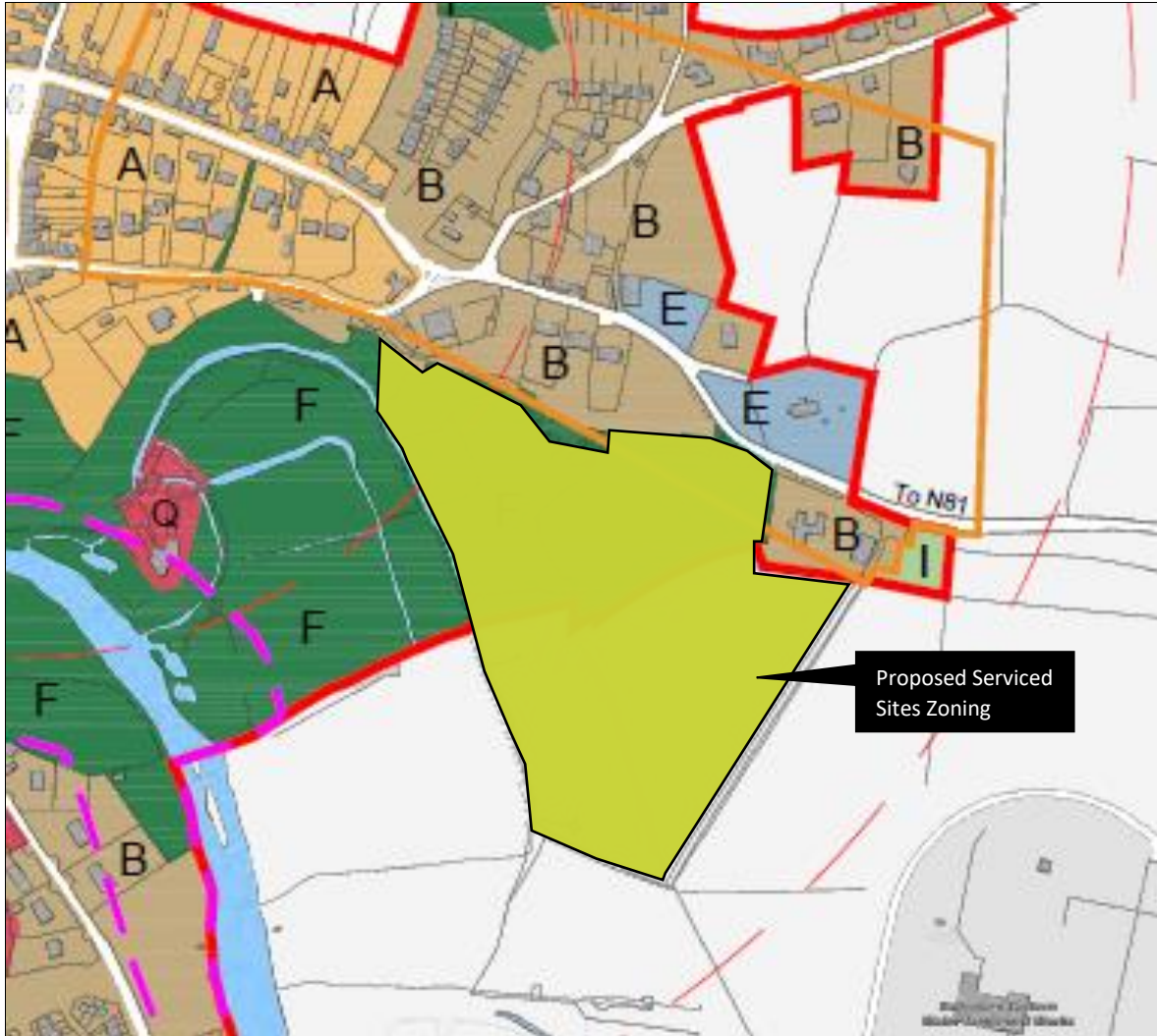
6.2.5 Planning Gain

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

20% of the dwellings would be Part V housing.

The existing pedestrian route to the north of the site could be upgraded and improved including public lighting.

Public access to the wooded area would be made available to the village by means of a walking trail, linking with the proposed 5k looped walking trail.



Proposed changes to dKCDP 2023-29 Zoning Map being sought under this submission

We trust that the Council will afford this submission serious consideration. We consider that these proposed zoning objectives would be consistent with the proper planning and sustainable development of the area.

Signed:

David Mulcahy
David Mulcahy Planning Consultants Ltd
CHARTERED PLANNING CONSULTANTS

Separate Enclosures

1. Desk-top Archaeological Impact Assessment prepared by Dr. Charles Mount.
2. Engineering Services Report prepared by Donnachadh O'Brien Associates Consulting Engineers