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SUBMISSION TO DRAFT KILDARE COUNTY DEVELOPMENT PLAN 2023-29

CONCERNING FUTURE DEVELOPMENT OF

**COOLERAGH, COILL DUBH,
CO. KILDARE**

Client: Mr. Adrian McAndrew

23rd May 2022

EXECUTIVE SUMMARY

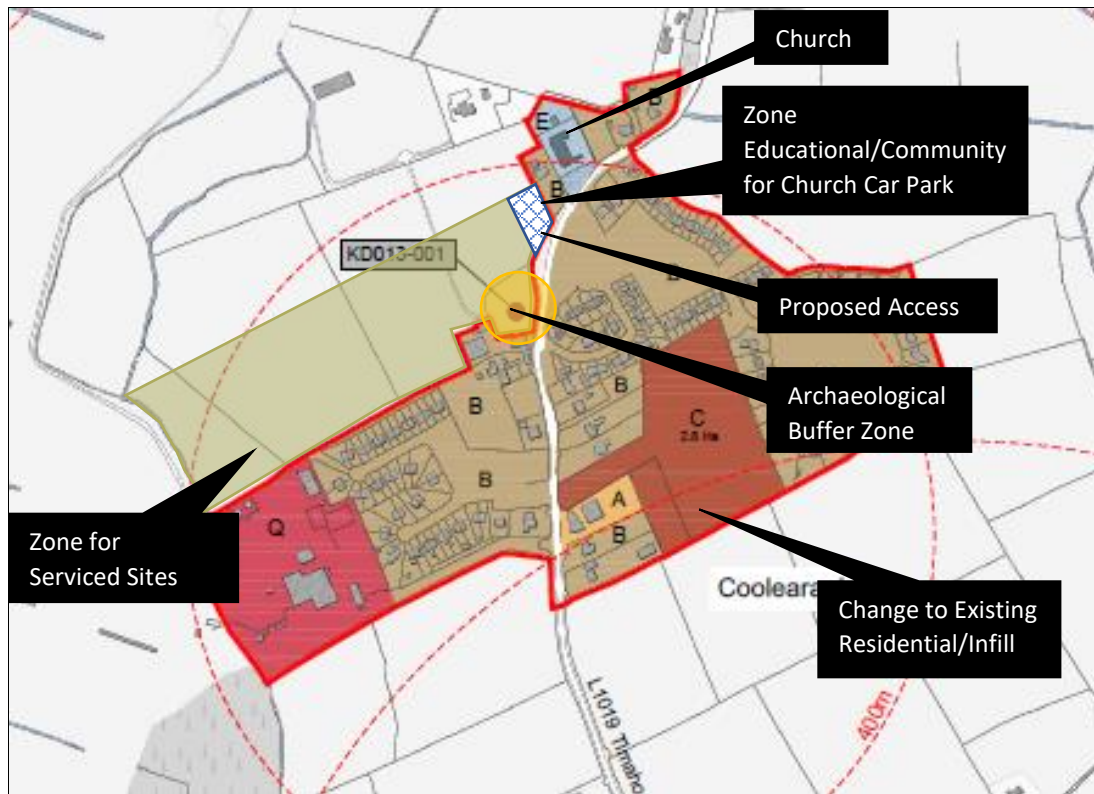
The purpose of this submission is to demonstrate that Serviced Sites should be provided for in the village of Cooleragh to provide a **genuine alternative for local persons who would otherwise seek to build one-off houses in the countryside.**

Alternatively, the subject lands should be zoned **New Residential**, with the existing New Residential zoned lands in the village (2.8Ha) rezoned Existing Residential/Infill given the permitted dwellings on this site are largely built out.

Mr. McAndrew's lands were previously included in the village boundary and were the subject of a grant of planning permission by Kildare County Council, although this was later refused by An Bord Pleanála on account of its scale and the lack of a footpath connection. The scale of develop envisaged under this submission is much smaller and the footpath is now in situ.

The submission also seeks to provide **community gain** in the form of a **car park for the Church** so as to address the serious problem of church-goers parking on the footpaths in the vicinity.

An engineering statement by Kavanagh Burke has confirmed that the lands are serviceable.



Proposed changes to the draft KCDP 2023-29 Coolera Village Zoning Map.

1.0 INTRODUCTION

David Mulcahy Planning Consultants Ltd have been retained by **Mr. Adrian McAndrew** to prepare a submission to the draft Kildare County Development Plan 2023-29 concerning the future development of the Rural Settlement of Cooleragh, Co. Kildare.

The purpose of this submission is to demonstrate that additional housing should be provided for in the village of Cooleragh to provide a genuine alternative for local persons who would otherwise seek to build one-off houses in the countryside.

The submission outlines that lands measuring c.6 hectares in the single ownership of Mr. McAndrew **should be included in the village boundary of Cooleragh** to accommodate such housing, by way of **serviced sites**.

Alternatively, the subject lands should be zoned New Residential, with the existing New Residential zoned lands in the village (2.8Ha) rezoned Existing Residential/Infill given the permitted dwellings on this site are largely built out.

The report finds that whilst residential zoned land in the village of Cooleragh/Coill Dubh has the benefit of permission for 103 houses these are **suburban** in nature and are unlikely to attract persons who would otherwise build a one-off house into the village.

The submission also seeks to facilitate lands owned by Mr. McAndrew being zoned **Education & Community** to facilitate a **car park for the church** to address on-street car parking issues which create a significant traffic hazard.

Note: All maps in this report are aligned due north. All underlined italics is author's emphasis.

2.0 LOCATION AND DESCRIPTION

2.1 The Two Villages

The rural settlements of Coill Dubh and Cooleragh are located approximately 40 kilometres from Dublin in north of County Kildare, west of the village of Prosperous.

Coill Dubh consists primarily of residential dwellings but has good community infrastructure in the form of a school, church, GAA club etc.

Cooleragh consists primarily of suburban style residential dwellings with a church and filling station in terms of community infrastructure. There is also a Bord na Mona facility.

The two settlements are separated from each other by agricultural lands.

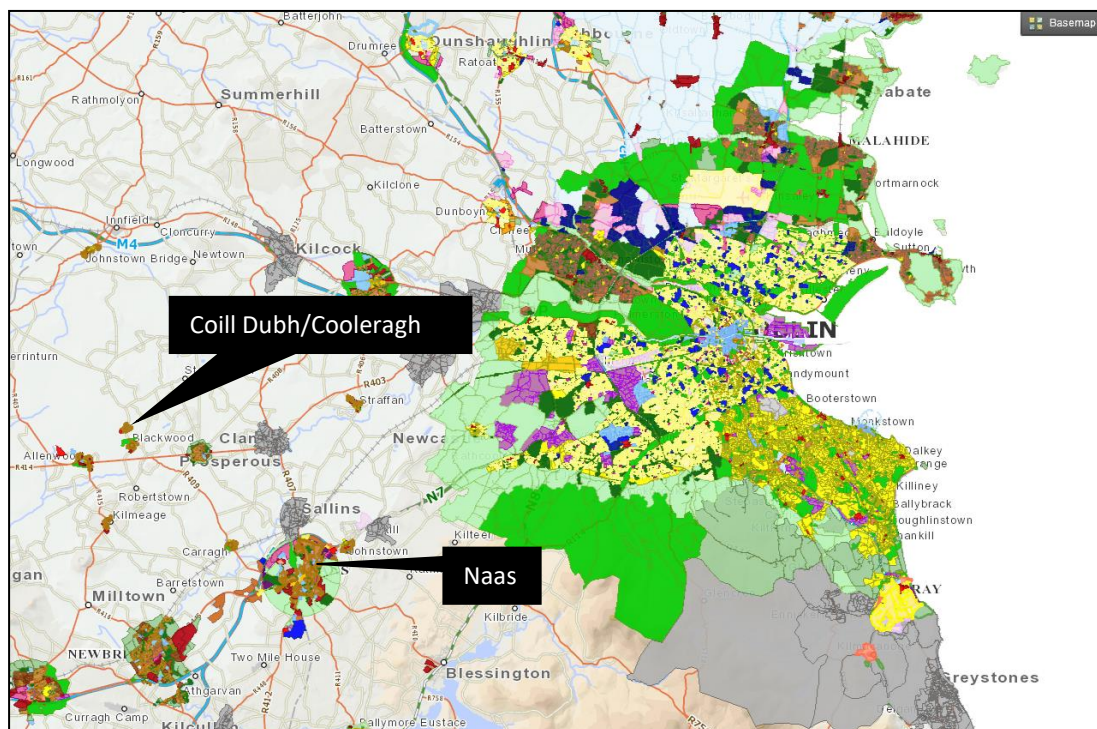


Fig No.1 Location of Coill Dubh relative to Dublin and Naas (source: Myplan.ie - OSI Licence No.EN 0080915).



Fig No.2 Map of Coill Dubh to the south and Cooleragh to the north (source: Myplan.ie - OSI Licence No.EN 0080915).

2.2 Subject Lands

The lands in the ownership of Mr. McAndrew¹ (c.6 hectares) are located to the north-west of the settlement of Cooleragh with frontage onto the local public (L1019) road running through the settlement.

At present these lands are primarily vacant and under grass. They contain a cluster of agricultural buildings to the south and there is a rath to the east which is covered by trees and shrubs (see details below).

¹ Part of Folio KE56981F measuring 18.22 hectares.

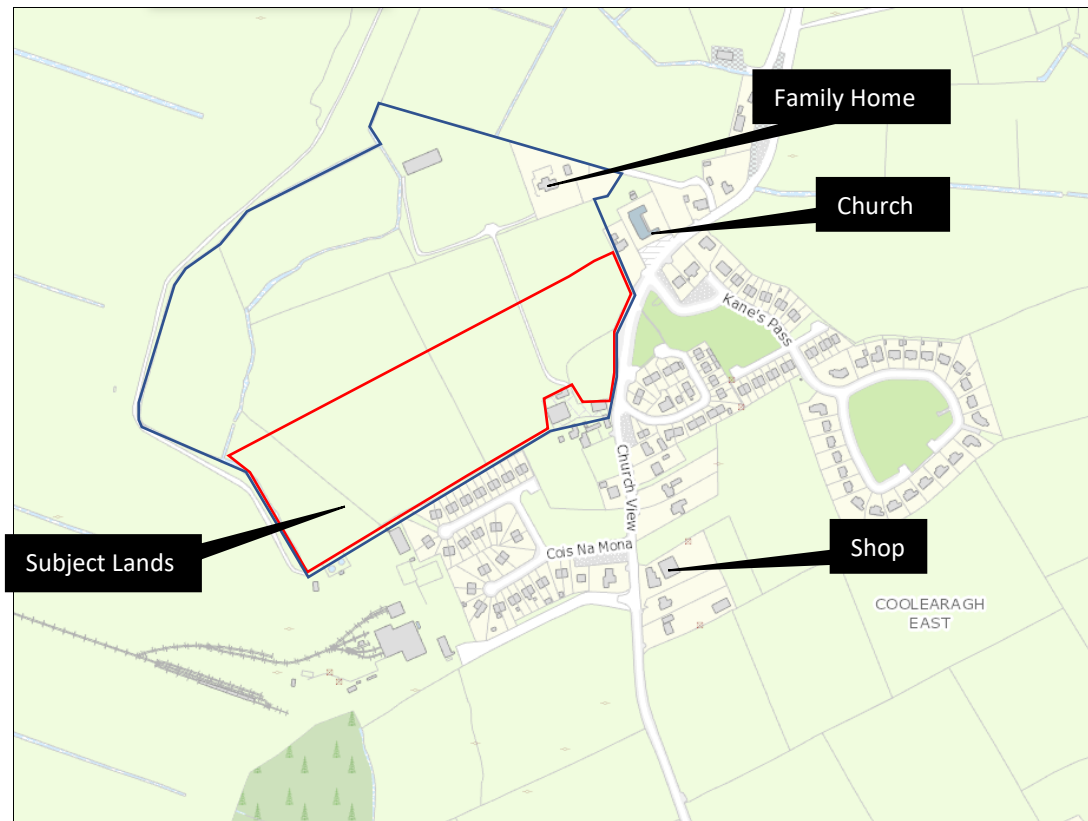


Fig No.3 Location of subject lands within Cooleragh (red line) (source: Myplan.ie - OSI Licence No.EN 0080915). Blue line indicates total ownership².



Fig No.4 Satellite Image of subject lands (Source: Google Earth Pro, 2nd June 2016). Red line indicative only.

² Folio No. KE56981F

2.3 Built and Natural Heritage Constraints

There are no known natural heritage constraints associated with the subject site based on myplan.ie. There is no direct pathway to any Natura 2000 site. The closest Natura 2000 site is Ballynafagh Lake SAC (Site Code: 001387) at a distance of approximately 2.1km from the site.

A review of the historic environment viewer identifies a Recorded Monument - Ringfort (Rath/Cashel) - on the east side of the subject site – ref: KD013-001. This does not affect a potential new zoning objective and can be dealt with by way of an appropriate buffer zone as part of any future planning application.

2.4 Flood Risk

There is no flooding associated with the subject site based on a review of floodinfo.ie

2.5 Adjoining Lands

The uses on the adjoining lands are as follows:

North:	Agricultural
East:	Public Road with footpath back to village (within the 50kph posted speed limit).
West:	Agricultural
South:	Residential dwellings

2.6 Cooleragh

The surrounding hinterland of Cooleragh and Choill Dubh is under significant pressure for one-off houses with many being refused. There has to be a viable alternative for persons who qualify under local needs but still want to live in the rural area with a generous sized plot and house.

3.0 PLANNING HISTORY

3.1 Subject Lands

Reg. Ref. 07/653

Conditional permission was granted by Kildare Co. Co. for **mixed use scheme** with a gross floor area of 12,708 square metres ranging in height from one to two storeys comprising the construction of 86 number residential units (10,882 square metres), one number crèche (324 square metres), one number medical centre (423 square metres), seven number retail units (1,079 square metres), a village green, 226 number car parking spaces and two number vehicular accesses from the existing adjoining local road on a site of 5.03 hectares at Coolearagh West , Coill Dubh Blackwood, Co. Kildare.

PL 09.231627

An Bord Pleanála subsequently **refused permission** on appeal for 2 no. reasons relating to the **scale** of the proposed development on unzoned land and the **absence of a proper public footpath** network on the L-1019 linking Coolearagh and Coill Dubh and the **absence of a proper public lighting** network in Coolearagh or on the L-1019 linking Coolearagh with Coill Dubh.



Fig No.5 Site layout for mixed use scheme under Ref. 07/653 at further information stage.

3.2 Extant Planning Permissions in Cooleragh

Reg. Ref.19/530

Conditional permission was granted to TMC Siteworks Ltd on 08/11/2019 to demolish existing agricultural outbuildings and sheds and constructing **2 no dwellings** and all ancillary site works at Cooleragh West, Coill Dubh, Co. Kildare.

Reg. Ref. 18/851

Ultra-Dawn Ltd. t/a Premier Developments were granted conditional permission in May 2019 for **52 dwellings** on residential zoned lands Cooleragh East, Coill Dubh, Naas, Co. Kildare. This permission is **largely implemented** with approximately 50% completed ('Ballynafagh Springs') - see aerial photographs dated 22nd May 2022 below.



Fig No.6 Aerial photograph of Ballynafagh Springs substantially completed.



Fig No.6a Aerial photograph of Ballynafagh Springs substantially completed.

The permitted layout is **suburban in nature** and may not be attractive to local persons who want build their own dwellings on large sites if they are to live in a village, rather than building in the countryside. Other dwellings types are required in the village to provide a viable alternative to those who qualify for local needs but cannot obtain planning permission for one off houses.



Fig. No.6b Site layout submitted at further information stage.

Reg. Ref. 22/436

An application for a **mixed-use development** involving replacement two storey service station building, 2 no. independent Office spaces and 4 no. residential apartments on first floor was recently declared invalid but is likely to be relodged imminently and will improve services in the village if granted.

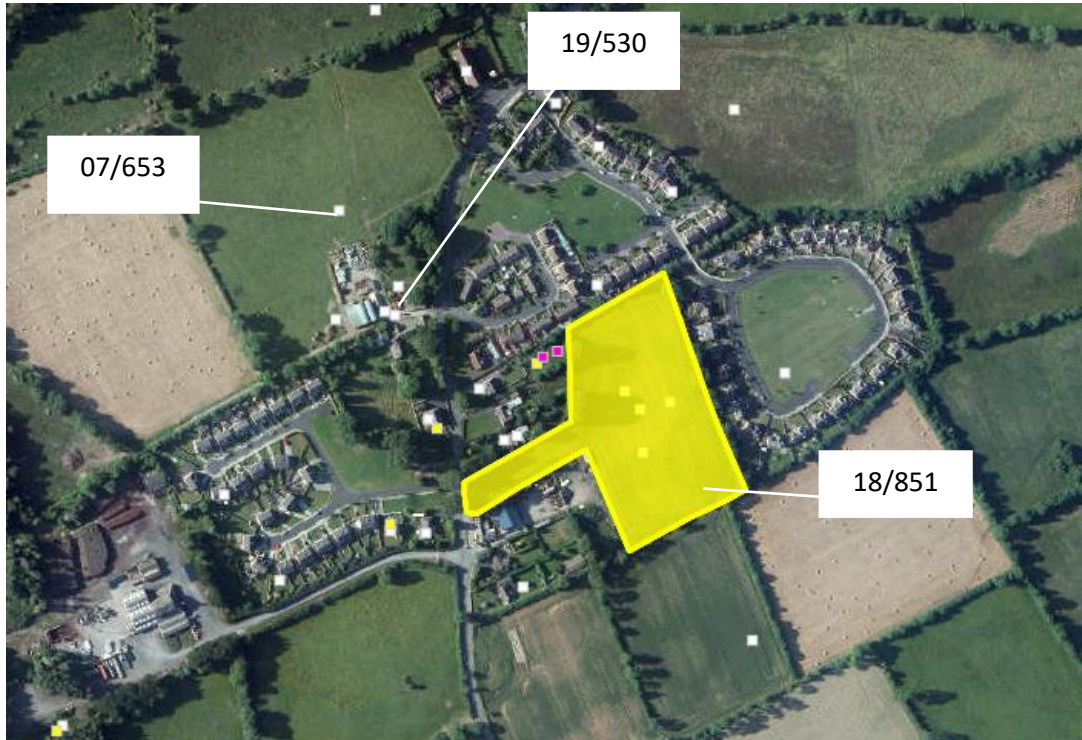


Fig. No.7 Relevant planning permissions referred to above.

3.3 Extant Planning Permissions in Choill Dubh

Reg. Ref. 19/1341

On 05/02/2020 permission for **51 dwellings** granted under Reg. Ref. 14/505 was extended 11th Jan 2025. This permission is largely implemented with approximately 50% of dwellings built out - known as Hawthorn Manor.



Fig No.X Permitted dwellings largely completed (Google Earth, April 2021)

The site layout plan shows that the layout is quite **suburban** in nature. Whilst there is a high proportion of detached houses, with the exception of 3 or 4 dwellings, they are on suburban type plots and are likely to be considered too small to attract persons who would otherwise build one-off houses into the village.



Fig No.8 Site layout submitted at further information stage under Reg. Ref. 14/505.

Summary

- All residential zoned lands within the village are the subject of extant planning permissions for suburban type layouts.
- The Council previously granted permission for a mixed use development on the McAndrew lands but this was subsequently refused by the Board.

4.0 PLANNING CONTEXT

4.1 Rebuilding Ireland - Action Plan for Housing & Homelessness 2017

The Action Plan is a response to the housing crisis which has seen a significant shortfall in housing, particularly in the greater Dublin area. The Action Plan sets ambitious targets to double the annual level of residential construction to **25,000³** homes and deliver 47,000 units of social housing in the period to 2021. There are 5 pillars to the Action Plan. Pillar 3 – Build More Homes – seeks to increase the output of private housing to meet demand at affordable prices.

4.2 National Framework Plan ('NPF') 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 3a

Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements.

This means within the existing built-up footprint of all sizes of urban settlement, as defined by the CSO.

³ Currently less than 20,000 dwellings are being built per annum, with Covid 19 affecting same.

National Policy Objective 3c

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.

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.

The NPF notes that in rural Ireland, many people seek the opportunity to build their own homes but find it difficult to do so in smaller settlements because of a lack of available sites and services. In order to assist this, local authorities will be supported in undertaking the necessary land acquisition, site preparation and local infrastructure provision to deliver self-build development options in smaller towns/villages. This would also apply in respect of private developers.

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.

4.3 Sustainable Urban Residential Development in Urban Areas Guidelines ('SURDUA') 2009

In section 6.3 'general advice', subsection (d) deals with 'Offering alternatives to urban generated housing'. It states that:-

"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 unserved rural area, the option to develop in a small town or village where services are available and within walking and cycling distance".

4.4 Regional Spatial and Economic Strategy for the Eastern and Midland Region, ('RSES') 2019 - 2031

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.

Coolreagh/Coill Dubh is located in the Hinterland Area. The following recommendations in the Strategy are 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).

4.5 Kildare County Development Plan 2005 – 11

The two separate settlements of Coill Dubh and Cooleragh were both identified as a single Village under the 2005-11 Plan. The lands within the Policy Theme Boundary for both settlements were not zoned per se but were identified for development as part of an overall aim to consolidate such settlements.

The **subject lands** to the north-west of Cooleragh **were contained within the Policy Theme Boundary in their entirety** thus indicating that the Council considered these lands suitable for development in principle.

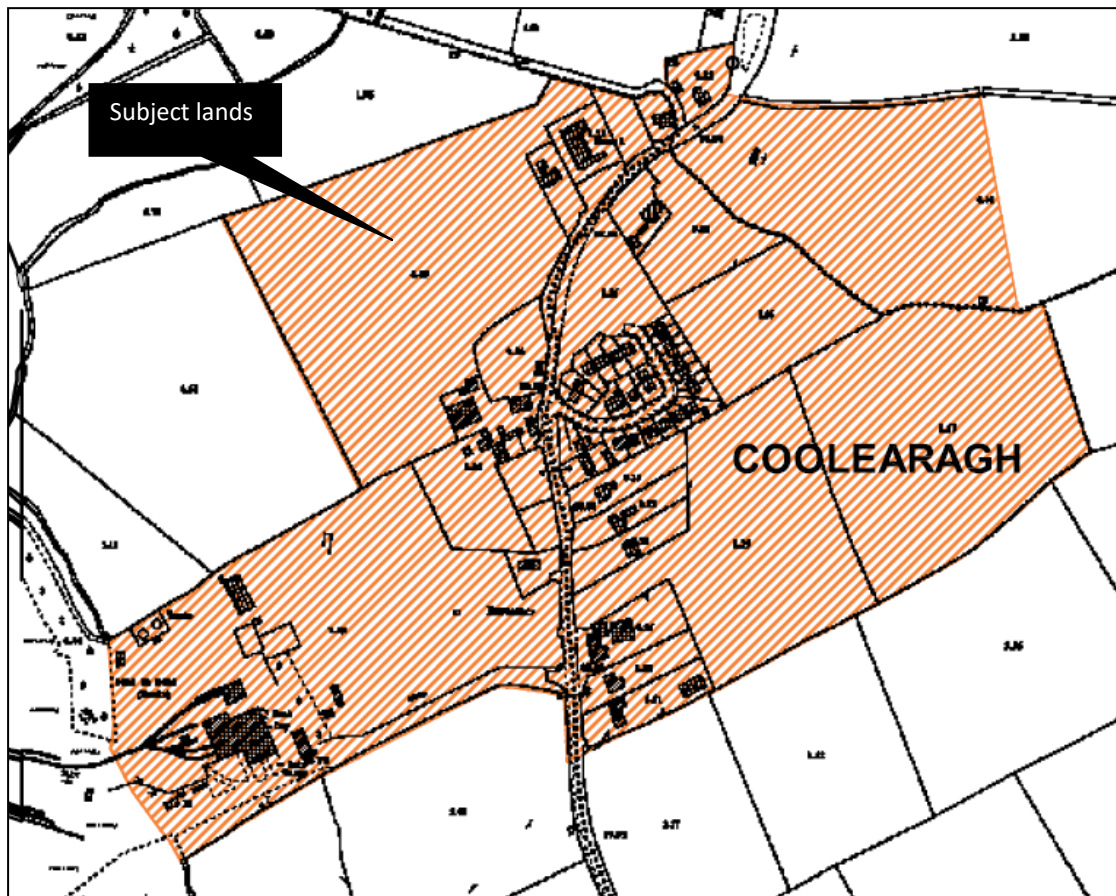


Fig No.9 Extract from Kildare County Development Plan 2005 - 2011

4.6 Kildare County Development Plan 2011 – 17

Under the KCDP 2011-17 Coill Dubh/Cooleragh the subject lands were outside the village boundary and **unzoned**.

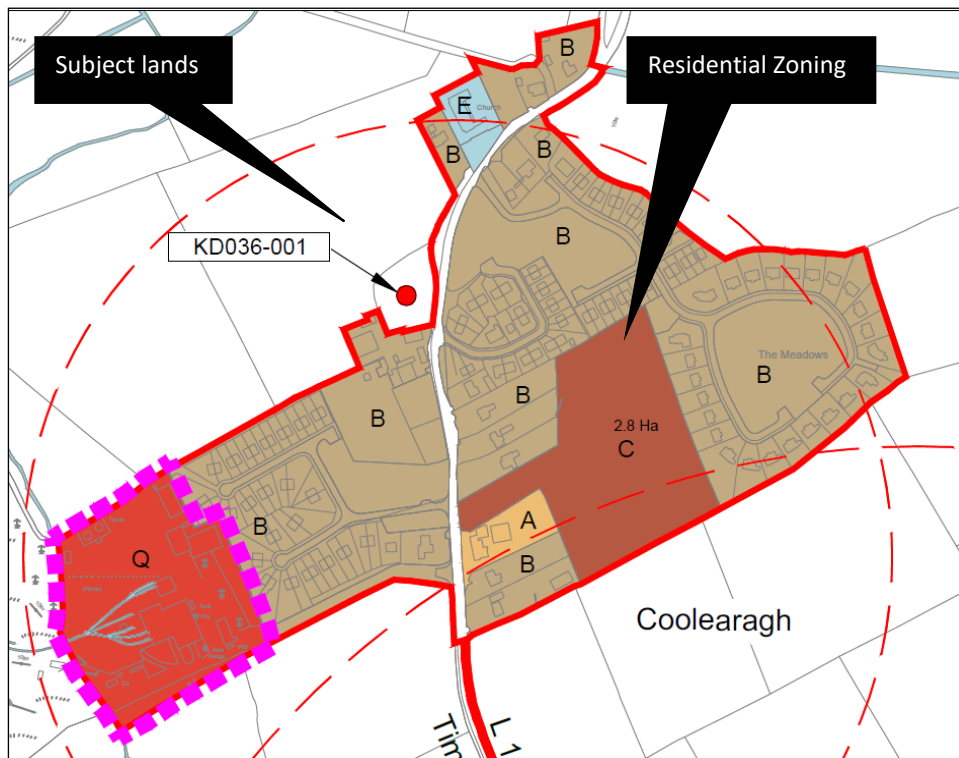


Fig No.10 Extract from Cooleragh Village Plan – source: Kildare County Development Plan 2011 – 2017.

4.7 Kildare County Development Plan 2017 - 2023

Coill Dubh and Cooleragh

The two settlements of Coill Dubh and Cooleragh together are designated as a 'Village' in the County Settlement Strategy. The subject lands are outside the village boundary and **unzoned**.

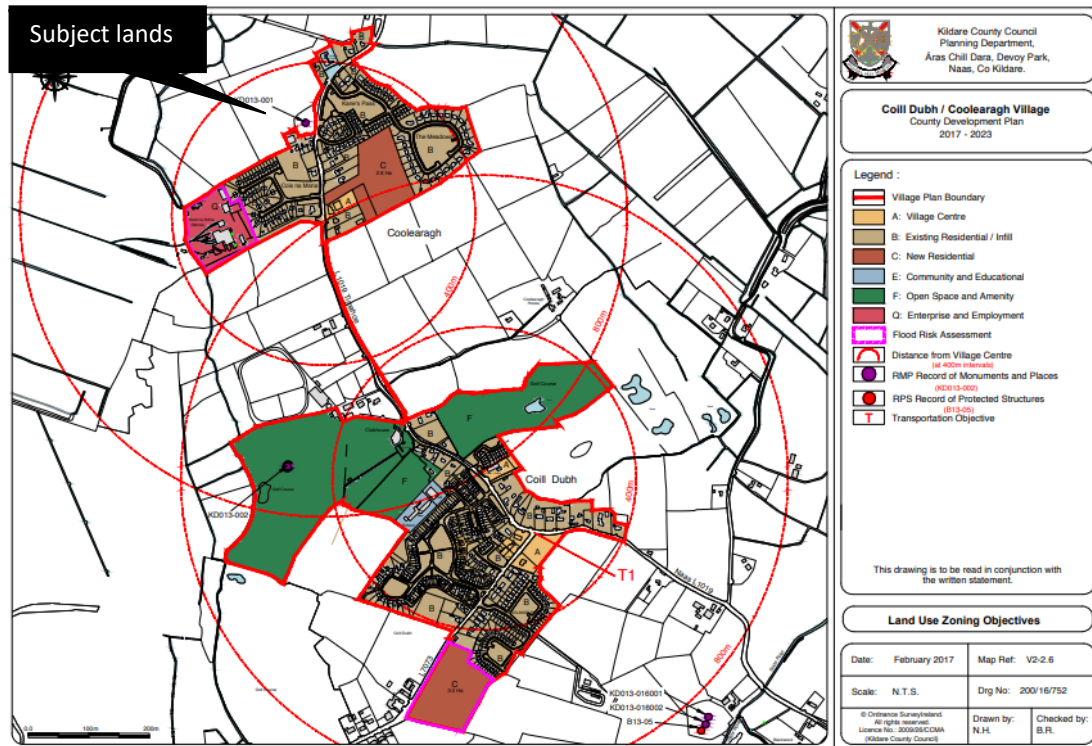


Fig No.11 Choill Dubh/Colleragh Village Plan – source: Kildare County Development Plan 2017 - 23.

5.0 DRAFT KILDARE COUNTY DEVELOPMENT PLAN 2023-29

5.1 Settlement Strategy

Cooleragh and Coill Dubh together remain designated as a **Village**.

The dKCDP notes, inter alia, that:

- The village has a population of 746 (2016 Census) an increase of 7.6% from 2011 (693). (figures only include Coill Dubh and do not include Coolearagh or the Hawthorn Manor estate to the south).
- Water – Supplied by the Srowland WTP. Coill Dubh / Cooleragh has an adequate water supply to meet the current demands and the future planned growth over the life of this Plan.
- Wastewater – Coill Dubh / Cooleragh is serviced by the Coill Dubh WWTP. The plant has **spare capacity for 630(PE)**.

5.2 Zoning Objective

Under the draft KCDP the subject lands are located **outside the Village Plan Boundary and unzoned**, despite adjoining same.

We note that the New Residential zoned land (2,8Ha) does not accurately reflect the fact that the planning permission for this site is approximately half built.

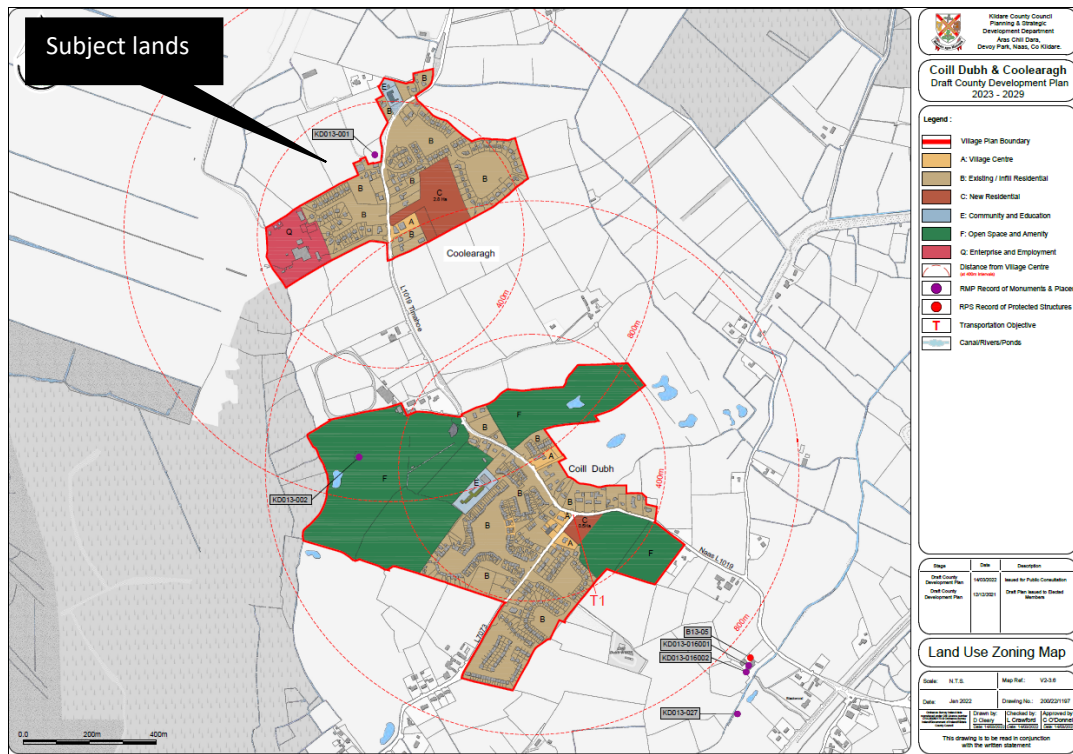


Fig No.12 Coill Dubh & Cooleragh Village Zoning Map showing subject lands unzoned under the dKCDP 2023-29.

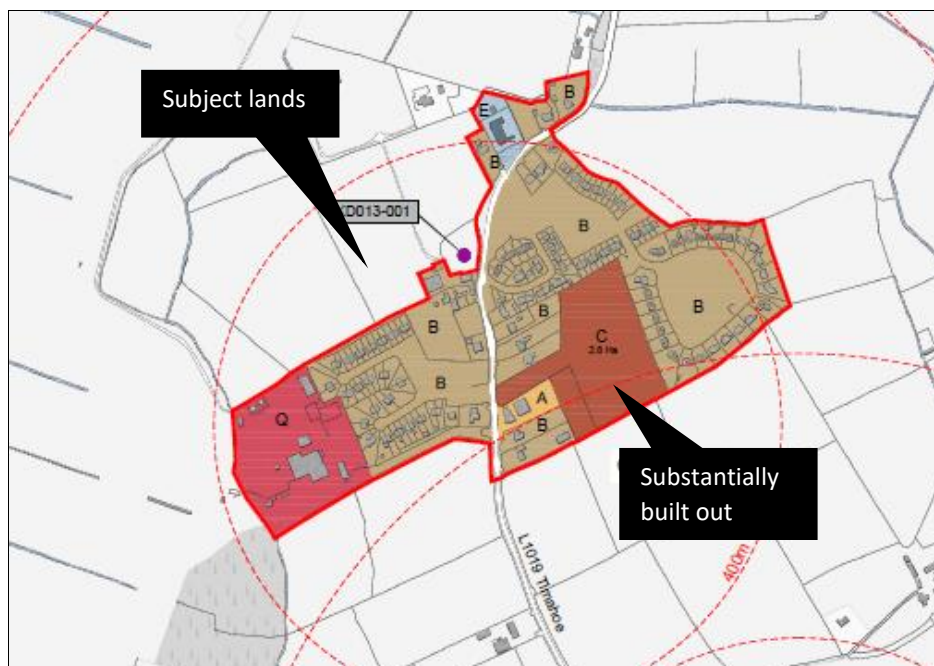


Fig No.13 Extract from the Coill Dubh & Cooleragh Village Zoning Map

5.3 Serviced Sites

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 2023-29 does not include any lands in the village of Choill Dubh and Cooleragh for Serviced Sites which seems remarkable given the pressure for one off houses in this area and the need to attract such persons into rural villages. We submit that such persons are highly unlikely to be attracted by smaller urban style dwellings and therefore there is a real need to provide a Serviced Sites Zoning or multiple such zonings in this village.

6.0 SUBMISSION

6.1 Summary

- National and regional planning strategies promote compact urban settlements with an emphasis on developing lands close to town centres for residential development.
- The site previously was included within the village boundary under the 2005-2011 KCDP and was the Council granted planning permission for a mixed-use (later refused by the Board on account of its scale).
- The site is located in Cooleragh and Choill Dubh which are both designated as a Village in the draft KCDP 2023-29 Kildare Settlement Strategy.
- The site is largely within the 400m radius from the village centre.
- The site is outside the village plan boundary under the dKCDP 2017-23.

- There are no known built or natural heritage constraints associated with the land, or flood risk; the recorded monument is easily addressed by way of a buffer zone.
- There is an established pedestrian access back into the village.
- The site is within the 50kph posted speed limit.
- The WWTP plant in the village has significant spare capacity to accommodate future growth.

6.2 Submission

The purpose of this submission is for the site to be zoned for **Serviced Sites**, which is a priority objective of the draft Plan, in order to provide a genuine alternative for local persons who would otherwise seek to build one-off houses in the countryside. Alternatively, we submit that the lands should be zoned **New Residential**.

We submit that **the New Residential zoning objective which applies to the 2.8Ha in Cooleragh should be replaced with Existing Residential/Infill** given that over 50% of the dwellings have been built out on foot of the planning permission which applies to these lands (housing estate known as Ballynafagh Springs').

There is extant permission for 103 dwellings on the 5.8 hectares zoned for residential development in Coill Dubh/Cooleragh. This equates to 288 persons based on an average household size of 2.8. This population increase ($1,095 + 288 = 1,383$) is **still well below the capacity of the WWTP** and thus more lands could also be included for residential development.

Most of the existing development in Cooleragh, and indeed permitted development, is of a **distinctly suburban nature**. It is considered that this type

of housing development does not provide a viable alternative to members of the rural community who might consider living in a village environment as opposed to a one-off house but will want larger type houses on larger plots at the edge of a village in a rural type environment i.e. Churchfield in Rathcoffey.

6.2.1 Church Car Park

Mr. McAndrew is willing to **provide a car park for the church** to avoid on-street car parking as part of any future planning application at mass times which is a problem in the area.

Please refer to the photographs below which demonstrate the on-street car parking problems that exist.



Fig No. 14 Photographs of significant on-street car parking along the L1019 associated with the church due to lack of off-street car parking.

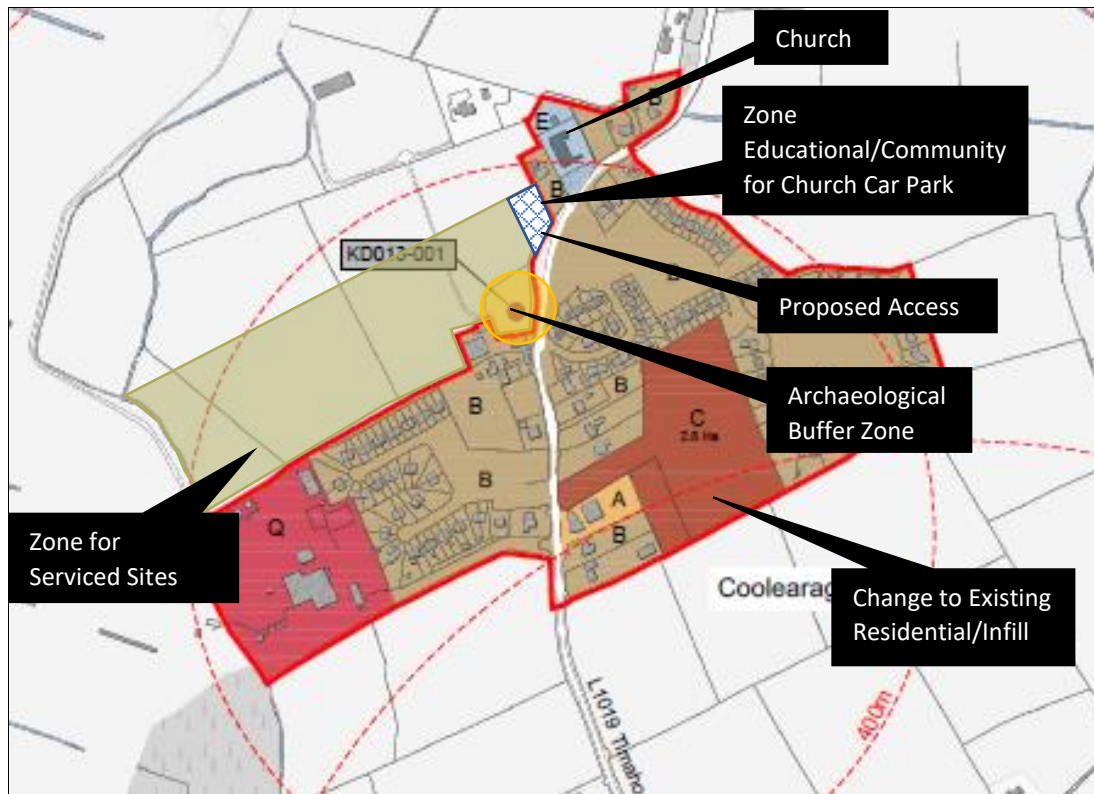


Fig No.15 Proposed changes to the draft KCDP 2023-29 Coolearagh Village Zoning Map.

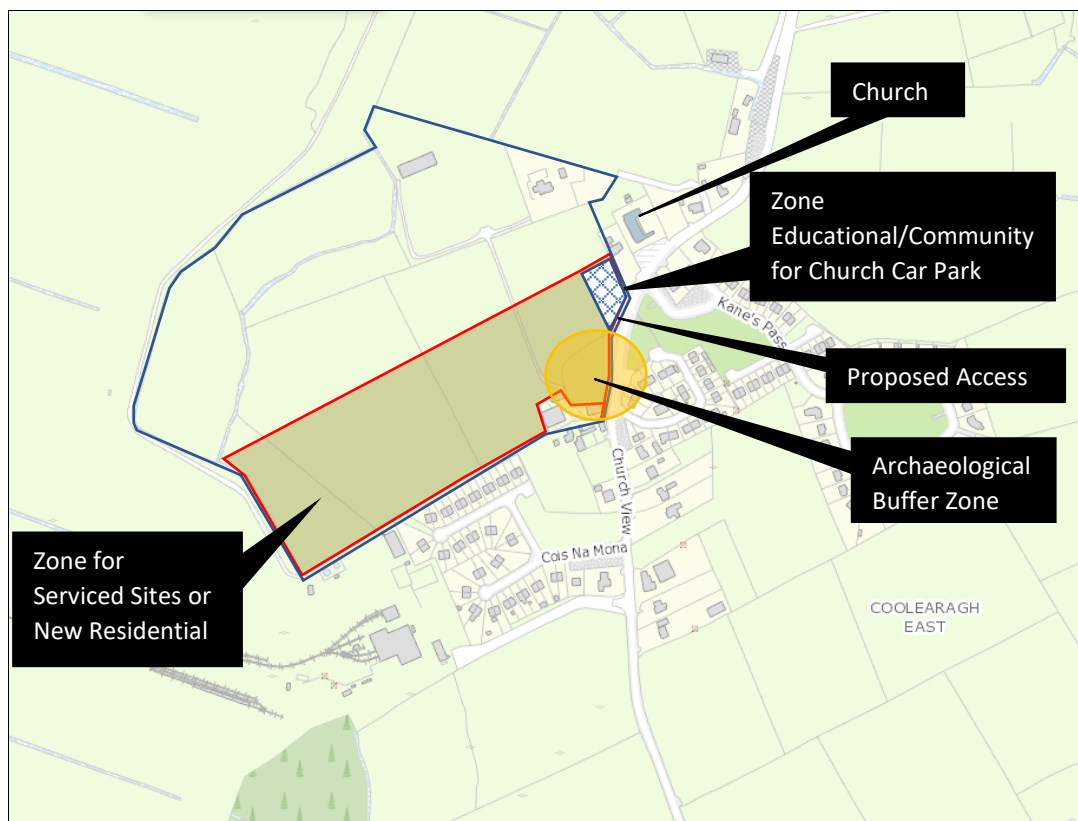


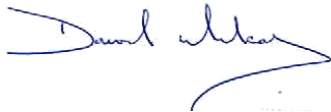
Fig No.16 Proposed changes to the draft KCDP 2023-29 Coolearagh Village Zoning Map on OSI background map.

6.2.2 Footpath

The footpath between Coill Dubh and Cooleragh that the Board previously raised as a reason for refusal for a mixed-use development on these lands is **now in situ**.

We trust the Council will take this submission into consideration in the preparation of the new Plan and zone the site for Serviced Sites or New Residential. 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

Appendix

1. Letter from Parish Priest in support of rezoning lands and obtaining a car park for the church.
2. Indicative drawing of proposed parish car park prepared by Brian Connolly Associates Consulting Engineers

1. Letter from Parish Priest in support of rezoning lands and obtaining a car park for the church.

Parochial House
Cooleragh
Coill Dubh,
Naas
Co. Kildare
W91 TX0W
20th May 2022

Áras Chill Dara
Devoy Park,
Naas
Co Kildare
W91 X77F

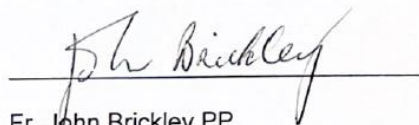
To Whom it may Concern

As a parish-faith community we wholeheartedly offer our support to Adrian McAndrew's application for re-zoning of the lands adjacent to the Parochial House, Cooleragh.

The inclusion of a car park is a huge step forward in making this area safer, as it is seriously hazardous on a regular basis due to the very poor parking facilities at or near our church.

We hope and trust that this application which includes much needed houses for families will get your support also.

Kindest Regards



Fr. John Brickley PP

STAPLESTOWN, COOLERAGH
PARISH
K & L

2. Indicative drawing of proposed parish car park prepared by Brian Connolly Associates Consulting Engineers

