

Senior Executive Officer
Planning Department
Áras Chill Dara
Devoy Park
Naas
County Kildare

23 May 2022

Re. Submission to the Draft Kildare County Development Plan 2023-2029
Submission on behalf of Westin Homes Ltd., Greenfield, Maynooth, Co Kildare

Dear Sir/Madam

This submission is made on behalf of Westin Homes Ltd., Greenfield, Maynooth, County Kildare, in response to Kildare County Council's request for submissions to the Draft Kildare County Development Plan 2023-2029 (the Draft Plan).

Westin Homes Ltd. has a proven track record in the delivery of quality housing development in County Kildare, having over 1,000 units constructed, under construction and in planning in County Kildare, including the Hayfield residential developments in Maynooth. Westin Homes Ltd. controls a strategic landbank to the south of the town, as identified on Figure 1 (Appendix 1), and is committed to the ongoing delivery of homes and the necessary supporting physical and community infrastructure.

This submission proposes the following amendments to the draft Plan to: (i) support the key core strategy objectives of the Plan for the County and Maynooth, and (ii) to support and enable the future development of Maynooth in a manner consistent with the national policy objectives of plan-led urban consolidation on sites proximate and accessible to high-capacity public transportation and town centres, and that can deliver strategic infrastructure and leverage investment in existing infrastructure.

1. That a substantial element of the 10,000-population allocation agreed with the MASP Implementation Group is allocated to Maynooth in the Draft Plan for the period 2023-2029 to appropriately reflect Maynooth's designation as a Key Town of strategic importance to the sustainable growth of the County.
2. Amend Core Strategy Objective (CSO) 1.9 to include the sentence in **yellow text** below after the sentence "*in accordance with the objectives of the County Development Plan and all relevant Section 28 Ministerial Guidelines*". ***Plan-led urban growth will prioritise sequential expansion, the development of brownfield and infill consolidation sites, and sites that can be delivered concurrently with strategic movement infrastructure and necessary social and community infrastructure.***

The planning grounds supporting the inclusion of the proposed amendments is set out below.

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The RSES, which implements the NPF, identifies Maynooth as a Key Town in the RSES Settlement Hierarchy. The role of Key Towns is to *'provide for the sustainable, compact, sequential growth and urban regeneration in the town core of identified Key Towns by consolidating the built footprint through a focus on regeneration and development of identified Key Town centre infill / brownfield sites'*.

Maynooth forms part of the Dublin Metropolitan Area (DMA) and is identified in the Dublin Metropolitan Area Strategic Plan (MASP) as a Key Town alongside Swords and Bray. The MASP seeks to facilitate the growth of the DMA to a population of 1.65 million by 2031. To realise these targets for compact growth, at least 50% of new homes must be built within or contiguous to the existing built-up area of Dublin and suburbs, and at least 30% in other settlements. The MASP seeks to align growth with enabling infrastructure which will promote capacity improvement.

Maynooth is within the North-West Development Corridor. The proposed electrification of the main Maynooth rail line by 2027 will support sequential growth in Leixlip and Maynooth. The MASP identifies strategic residential, employment and regeneration development opportunities on the corridors along with the requisite infrastructure investment needed to ensure a steady supply of sites in tandem with the delivery of key public transport projects, including the Maynooth Outer Orbital Route.

RPO 4.33 seeks to *'support the **continued development** of Maynooth, co-ordinated with the delivery of strategic infrastructure including pedestrian and cycle linkages within the town and to the Royal Canal Greenway, DART expansion and road linkages forming part of the Maynooth Outer Orbital Route in a manner which supports future development and population growth and builds on synergies with Maynooth University promoting a knowledge-based economy.'* [Emphasis added]

The MASP notes the requirement for the core strategies of the relevant local authorities to demonstrate consistency with the population targets expressed in the NPF and the Implementation Roadmap, which has since been reviewed under the Structural Housing Demand in Ireland & Housing Supply Targets Circular issued December 2020.

The Housing Supply Targets Circular issued provides that there is a total projected new household demand for almost 31,000 new households per annum every year from 2020 to 2040. The Circular states that *'there is a more pressing need to increase national housing supply to meet existing, unmet housing demand, to the greatest extent possible in the shortest time possible, while also accommodating projected national housing demand. Factoring in existing demand together with future projected demand, will require annual average national demand for just over 33,000 new households per annum, to be met during the period 2020 to 2031'*.

Section 5.7 of the RSES notes that there is a further allowance of transition population targets under National Policy Objective (NPO) 68 of the NPF by way of up to 20% of the targeted growth in the city being transferred to other settlements in the MASP. This shall apply only to the three Metropolitan Key Towns in the MASP, one of which is Maynooth, and only if they can demonstrate compact growth on high capacity planned or existing public transport corridors.

In this regard, NPO 68 states:

'A Metropolitan Area Strategic Plan may enable up to 20% of the phased population growth targeted in the principal city and suburban area, to be accommodated in the wider metropolitan area i.e., outside the city and suburbs or contiguous zoned area, in addition to growth identified for the Metropolitan area. This will be subject to:

- any relocated growth being in the form of compact development, such as infill or a sustainable*

urban extension;

- *any relocated growth being served by high-capacity public transport and/or related to significant employment provision; and*
- *National Policy Objective 9¹, as set out in Chapter 4.'*

The Draft Plan designates Maynooth as a Key Town, the highest tier in the settlement hierarchy. The Draft Plan defines Key Towns as *'large towns which are economically active that provide employment for their surrounding areas. High quality transport links and the capacity to act as regional drivers to complement the Regional Growth Centres'*.

The Core Strategy allocates 997 no. additional units to Kildare over the period to 2028, and states that *'additional population allocation for Maynooth of up to 10,000 persons from redistribution of NPF City and Suburbs allocation (EMRA, July 2020). The precise allocation that will be attributed to Maynooth however will be determined at LAP stage on foot of detailed assessments and audits of available social and physical infrastructure'*. On this basis, a residential zoned land requirement for Maynooth is not stated.

Furthermore, Objective HO O3 seeks to *'co-operate with the Eastern and Midland Regional Assembly in planning for new homes and meeting housing needs for the Dublin Metropolitan Area (which includes Maynooth, Leixlip, Celbridge, and Kilcock) through the implementation of the Dublin Metropolitan Area Strategic Plan'*.

This submission supports the approach outlined in the Draft Plan which provides for a substantial additional population allocation to Maynooth consistent with NPO 68 and the MASP. It is considered that the additional allocation to Maynooth appropriately reflects Maynooth's designation as a Key Town, of strategic importance to the future expansion and development of the County, capable of accommodating above average population growth.

The RSES Settlement Strategy for Key Towns is to *'provide for the sustainable, **compact, sequential growth and urban regeneration in the town core of identified Key Towns by consolidating the built footprint** through a focus on regeneration and development of identified Key Town centre infill / brownfield sites'* [emphasis added].

The MASP is focused on the phased and sequential delivery of a steady stream of sites to meet demand including the identification of long-term strategic future development areas. RPO 5.5 states that *'future residential development supporting the right housing and tenure mix within the Dublin Metropolitan Area **shall follow a clear sequential approach, with a primary focus on the consolidation** of Dublin and suburbs, and **the development of Key Metropolitan Towns, as set out in the Metropolitan Area Strategic Plan** (MASP) and in line with the overall Settlement Strategy for the RSES. Identification of suitable residential development sites shall be supported by a quality site selection process that addresses*

¹ National Policy Objective 9

In each Regional Assembly area, settlements not identified in Policy 2a or 2b of this Framework, may be identified for significant (i.e., 30% or more above 2016 population levels) rates of population growth at regional and local planning stages, provided this is subject to:

- Agreement (regional assembly, metropolitan area and/or local authority as appropriate);
- Balance with strategies for other urban and rural areas (regional assembly, metropolitan area and/or local authority as appropriate), which means that the totality of planned population growth has to be in line with the overall growth target; and
- A co-ordinated strategy that ensures alignment with investment in infrastructure and the provision of employment, together with supporting amenities and services.

environmental concerns' [emphasis added].

Objective HO O2 of the Draft Plan seeks to ensure that *'sufficient land is zoned at appropriate locations in compliance with the Core Strategy and Settlement Strategy of the Development Plan, in order to meet the likely future housing demands identified in the Housing Strategy and HNDA'*. In addition to ensuing sufficient zoned lands, it is submitted that consistent with national and regional policy, new development should focus on sequentially preferential lands which are accessible to the existing town centre and public transportation links.

With specific regard to Maynooth, the M4 to the south provides a strong physical boundary to the extent of development of the town. Sequentially, the lands to the south of the town are contiguous with the existing urban footprint, are characterised as an urban infill consolidation site, and, significantly, facilitate the completion of the Maynooth Outer Orbital Route (MOOR) providing high-capacity connectivity to the Motorway from the west and north of the town, alleviating congestion in the town centre, and facilitating enhanced permeability and connectivity for walking and cycling.

The strategic importance of the lands to the south west of Maynooth was specifically referenced in the Draft RSES, which stated that *'the further development of agricultural lands at Crewhill and Newtown would provide for significant residential development, extending the boundary to the north and west of the town.'* The KCC submission on the Draft RSES acknowledged the strategic importance of lands to the south west of the town stating that *'future potential for consolidation of the built form of Maynooth exists to the north west of the town are Crewhill and to the south west at Newtown where there are opportunities to provide for significant new residential development'*.

As noted, Westin Homes Ltd. has a proven track record in delivering quality homes in Maynooth, and controls the landbank immediately south of Hayfield which it developed, the train station and the town centre, as identified on Figure 1. It is considered that these lands are sequentially preferential, being the closest infill and consolidation landbank of scale relative to the train station and town centre, and can make a significant contribution to urban consolidation objectives, delivering compact growth and protecting and enhancing the quality of the built and natural environment of Maynooth. Significantly, the development of these lands presents an opportunity to deliver strategic transportation and movement infrastructure for the town in the short to medium term, including the MOOR.

I trust that the Council will afford due regard to the content of this submission and I look forward to publication of the draft amendments to the Plan in due course.

Yours faithfully,



Declan Brassil

Declan Brassil & Co.

Appendix 1

Figure 1: Location and Context of Lands at Newtown controlled by West Homes Ltd.

