

Senior Administrative Officer,
Planning Department,
Kildare County Council,
Áras Chill Dara,
Devoy Park,
Naas,
Co Kildare.

10th May 2022

Our Ref: 21040

Re: Submission to the Draft Kildare County Development Plan 2023-2029

Dear Sir/Madam,

1.0 Introduction

On behalf of our client, Newtownsland (Kill) Limited, The Grange, Newcastle Road, Lucan, Co. Dublin, we wish to make this submission to the Draft Kildare County Development Plan 2023- 2029. Our client is a significant landowner in the area, with an interest in the Former Kill Equestrian Centre.

Kildare County Council has sought public comment on the policies and provisions which are set out in the Draft County Development Plan 2023 – 2029. We also would like to promote Kill as a Compact Town, which will provide allow people to live and work within the one area, and commute to work on foot. This could be achieved through the rezoning of our clients' lands, the Former Kill Equestrian Centre, to provide for a mix of uses bringing it back into active use.

The site measures c. 12.5 hectares, of which only 2.34 hectares are proposed for residential with the remainder proposed for employment or equestrian. The site is within 13 minutes walk to the town centres and a 5 minute cycle, immediately adjacent to existing residential and the new proposed road. It is located as indicated on the Core Strategy Map in a town, within the Multi-Modal Transport Corridor and beside a new proposed road to the north of the site.



Figure 1 Outline of the subject site

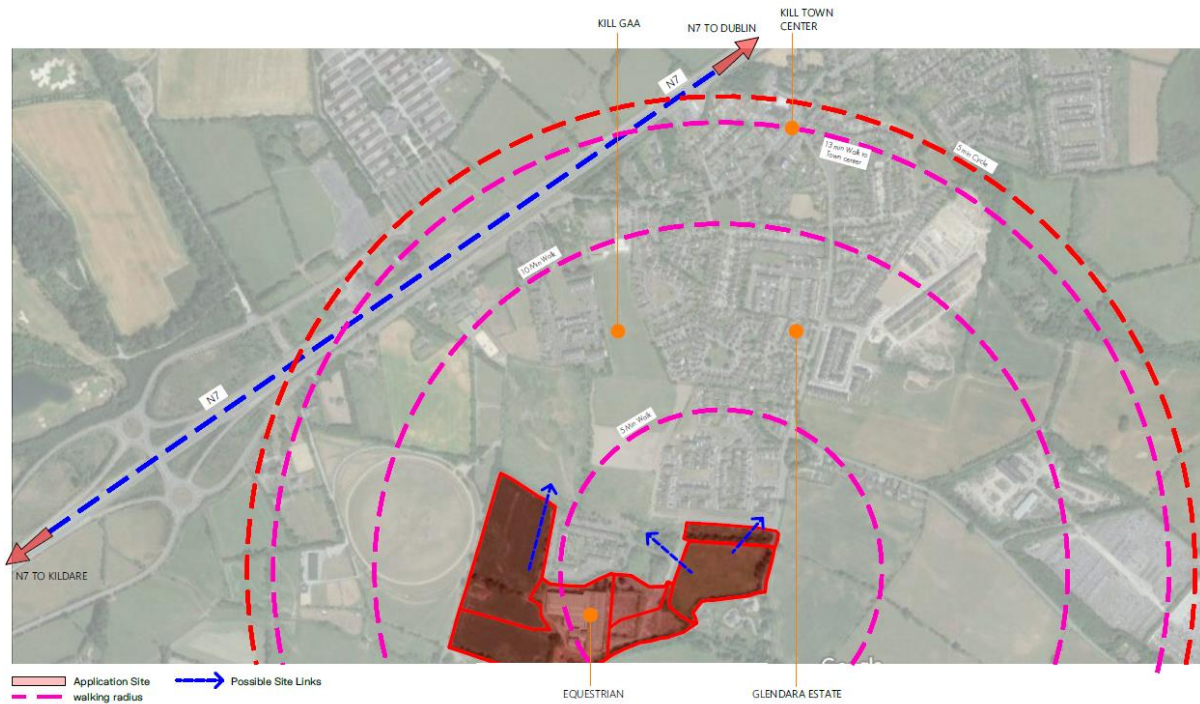


Figure 2 Relationship with the Kill Town

It is proposed that the site could accommodate a range of differing uses which would support the local area by providing housing, business space and also recreational area. The proposed masterplan for the site is indicated below.

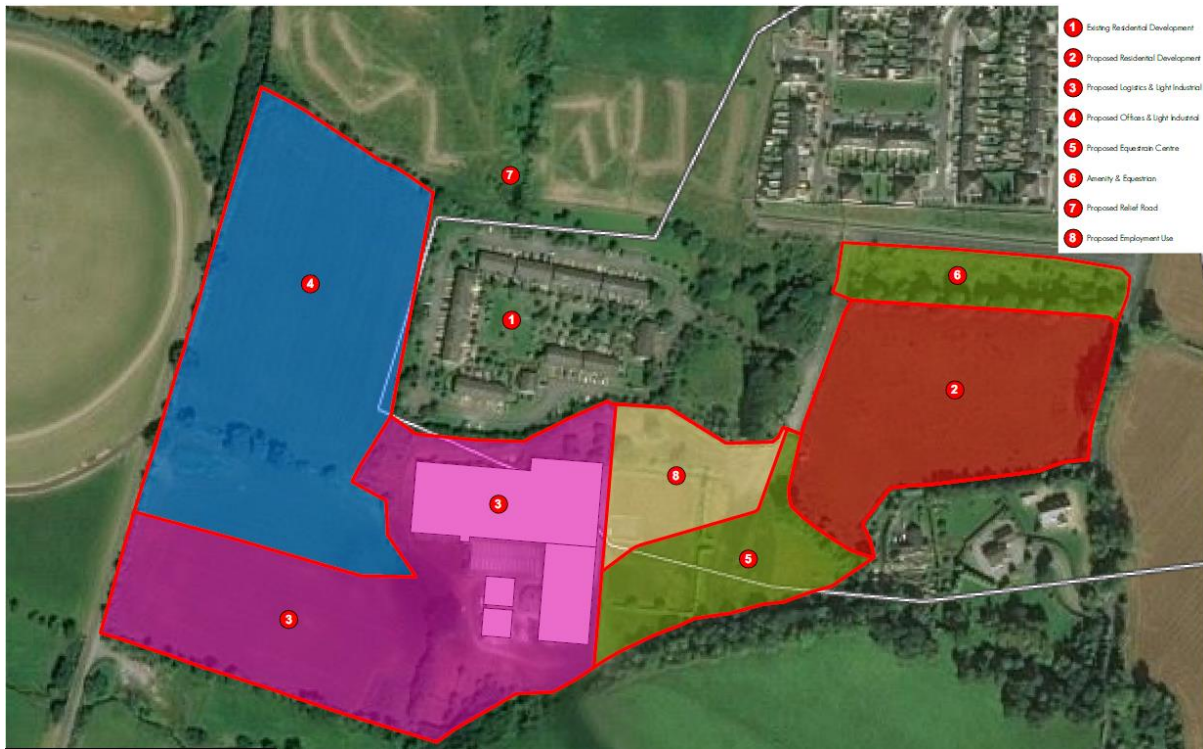


Figure 3 Proposed rezoned land uses

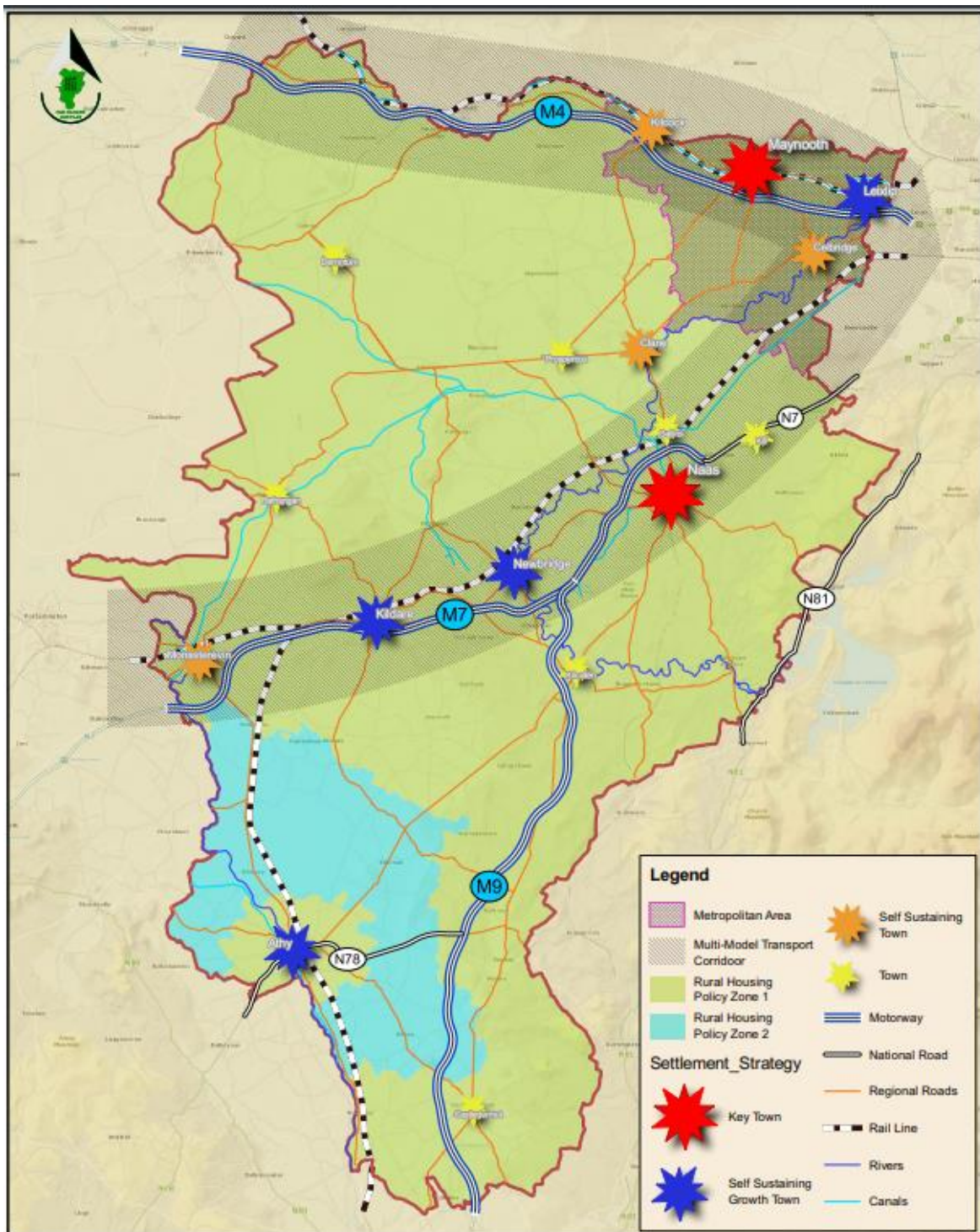


Figure 4 Location of Kill on a multi modal transport corridor in the Core Strategy as set out in the Draft Development Plan

These proposed land uses and rezoning would be inline with Chapter 2 Core Strategy and Settlement Strategy Objectives generally but specifically objectives identified at CSO1.5, CSO1.6 and CSO 1.7 as follows:

CSO 1.5 Promote compact growth and the renewal of towns and villages through the development of underutilised town centres and brownfield sites, maintaining a 'live' baseline dataset and to monitor

the delivery of population growth on existing zoned and serviced lands to achieve the sustainable compact growth targets of 30% of all new housing within the existing urban footprint of settlements.

CSO 1.6 Promote, and initiate where feasible, measures to reduce vacancy and the underutilisation of existing building stock and support initiatives that promote the reuse, refurbishment and retrofitting of existing buildings within settlements throughout the county.

CSO 1.7 Promote and facilitate the development of sustainable and socially integrated communities through land use planning, by providing for land uses capable of accommodating employment, community, leisure, recreational and cultural facilities having regard to the quality of the environment, landscape character and the archaeological and architectural heritage.



Figure 5 Indicative Masterplan layout

By locating offices and light industrial to the east it will provide for employment opportunities within Kill, adjacent to the proposed Relief Road and beside existing and proposed residential. It will also allow for the existing vacant and derelict buildings to be re-used for employment rather continuing to deteriorate. This will enable people within Kill to live and work within 10 minutes of the village centre, providing a truly walkable development.

Our client has also been approached by Endress+Hauser, who are a large local employer in Kill, regarding the potential of the use of this land to meet their growth and expansion needs. Endress+Hauser are a global leader in measurement instrumentation, services and solutions for industrial processing. They have a net sales of just under 2.9 billion euros, employ more than 15,100 employees worldwide, have over 8,600 patents and patent applications and invest c. 193 million euros each year into their company to ensure the continued growth of the company. As a local employer, of c. 45 employees (with a further 15 in Cork), who have been located here since 2014 they have a strong preference to remain in Kill. The current expansion plans is to have 80 employees by the end of 2022

with the majority of these located in Kill, their main offices. As Endress+Hauser continues to expand and grow it requires accommodation in Kill with the capacity to expand to 200 employees.

Endress+Hauser have two main activities in Ireland which include:

- To serve and service with their products (measuring devices) their customers into the 26 counties. This is mainly an engineering activity which consists of sizing and selecting their measuring devices which best fit their customers' needs and wants.
- To service Endress+Hauser Group with support and helpdesk activities in the field of SAP and Logistics. Those activities require both shift work (05:00 to 23:00) and to keep attracting talent. The service team will be 40 employees by the end of 2022.

Unfortunately, Endress+Hauser have 3 years remaining on their lease and the office space will not be able to cater for their growing needs. They therefore require a bigger space with the mandate from Endress+Hauser Group to build and own their commercial industrial office. They wish to stay in County Kildare, and more specifically Kill, as this has served them very well, and they are part of the Kildare Chamber and of the associated networks. Also, Kill is highly appreciated by the current employees and by new joiners. It is considered that locating in Kill provides a good life and work balance for their employees. As such they strongly support any zoning which prioritises a balance between residential and commercial industrial building.

The historic use of the site will not be lost, rather it will be reduced in scale to provide for an outdoor equestrian area along with stables and sheds. These will be all reused. This will provide a local equestrian facility for the enjoyment of the local community in Kill which is proportionate to the size of Kill. This reduced size, proportionate to the area, will result in a viable business in the local area. It will provide an attractive amenity for locals in terms of both facilities and also visual amenity seeing a redundant vacant building and site be replaced by an attractive, active use within this area. It is also noted that on the 24th May 2019 An Bord Pleanála granted permission (ABP Ref 303186-18) for the demolition of some of the buildings and reduction in size of the equestrian facilities on site. This grant of permission subject to conditions confirms that this facility of the existing scale is not required on this site.

The siting of the residential area, adjacent to the existing "The Stables" residential development to the east and Newtown Manner to the north. There is a need for more residential in this area, to facilitate and support the existing and proposed employment lands in this area. This request for a small amount of residential development presents an opportunity to enable the appropriate and timely delivery of residential development to meet the housing demand envisaged by the Regional Planning Guidelines, at a time when there is an ongoing housing crisis in the country.

Independent vehicular access points to the commercial and residential areas can be provided off the existing road network as well as the potential provision of a new access point when the new radial route is provided.

Support of National planning policy

This approach to this land is in line with the aims of National Planning Framework which encourages the development of more compact urban development highlighting that it *“will reduce harmful impacts on the environment by:*

- *Reducing land take, preserving agricultural land and habitats;*
- *Utilising existing infrastructure, buildings and sites and reducing the need to travel long distances, which will reduce energy consumption and carbon emissions;*
- *Improving the viability of public transport services; and*
- *Enhancing public health by encouraging and facilitating more active lifestyles by creating a more walkable and cycling friendly urban environment.”*

It goes on to highlight that the impact of urban places have *“an impact on their surrounding area and are integrated with their hinterland to some extent. They are in turn influenced by activity in the wider area, particularly in the case of smaller settlements. Where close to cities or larger towns, many have become commuter-focused, but elsewhere there are enterprise opportunities in lieu of more traditional service functions, based on local assets, innovation and quality of life, e.g. servicing an emerging resource sector or a new tourist amenity such as a greenway, supported by improving connectivity.*

Sustainable models of urban development can deliver quality and maximise the advantages and opportunities of more compact growth, based on increased population and employment density.” It is on this basis that National Policy Objective 6 was developed as follows:

“Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area.”

The NPF also targets “

- *a greater proportion (40%) of future housing development to be within and close to the existing footprint of built up areas*
- *making better use of under-utilised land and buildings including “infill, brownfield”, and publicly owned sites and vacant and under-occupied buildings, with higher housing and jobs densities, better serviced by existing facilities and public transport.”*

Zoning for Kill

Kill is ideally positioned to deliver both residential and employment in line with NPO 6. This is further confirmed by its highly accessible location close to the N7, connecting Kill to Dublin and Naas, its large areas of underutilised land available for redevelopment making it an ideal attractive location for people to set up businesses, live and work within the area.

The site is currently zoned for Equestrian uses associated with the Kill International Equestrian Centre. However, this centre has laid vacant for over 10 years, for the last two development plans, with no appetite from the equine industry to see it come back into use. There has also been substantial redevelopment of Goffs to the north side of the N7 and it is considered more appropriate to encourage and continue the consolidation of this as the primary equine location for Kill rather than trying to

spread it between two sites resulting in a conflict between the areas. If the zoning remains in place as it is at the moment, it is likely that this site will remain vacant and derelict into the future.

We acknowledge that there is a requirement for a Flood Risk Assessment required for the southern portion of this site. From an initial review our engineers indicate that *“the area is susceptible to the 1000-year return fluvial flood event with increases for High End Future Scenario (HEFS) Climate change”*. They recommend further hydraulic modelling but have advised that the land falling in this area is appropriate for employment use. As such the proposed rezoning for the site keeps any residential above the Flood Risk Assessment area.

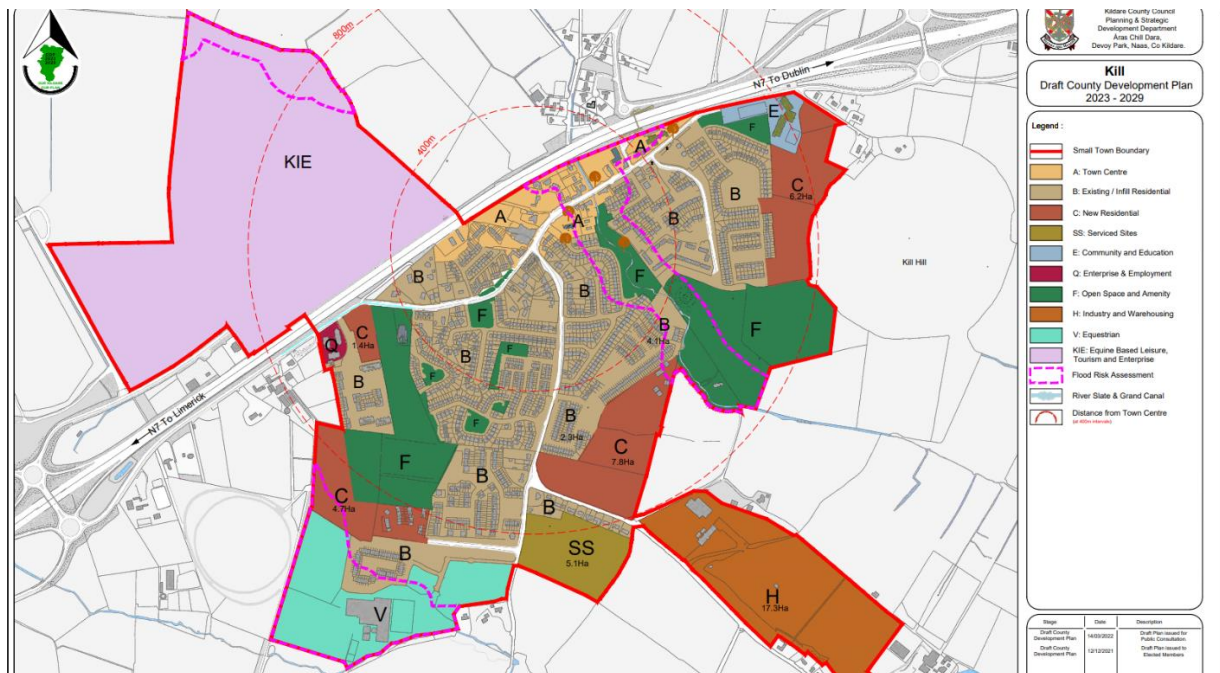


Figure 6 Proposed zoning under the Draft County Development Plan

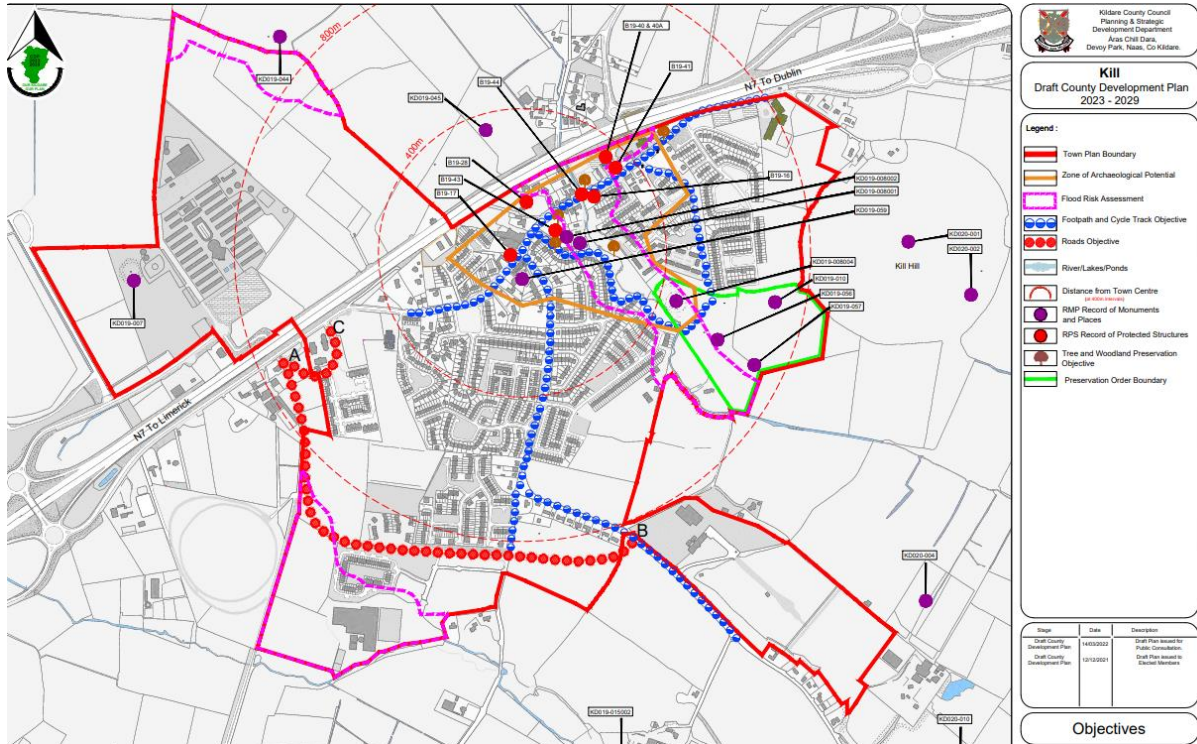


Figure 7 Proposed infrastructure

Kill is identified within the Draft Development Plan as a town. However, despite its comparable size to Kilcullen, has a restricted level of dwellings targeted for growth in this town. The proposed level of new dwellings for Kill is more akin to Prosperous than Kilcullen. Prosperous has a population of 1,000 less people than Kill. This level of growth is considered to be disproportionate to its size, the level of existing employment within the town, the quantum of brownfield land available for re-use and redevelopment within the town boundary and its proximity to the excellent transport infrastructure in the form of the N7, linking it to Dublin and Naas. All of these factors make Kill an ideal location for increased employment and residential development in the area. On this basis, the target for Kill should be at least doubled in terms of housing, and sites should also be clearly identified for new employment development.

Table 2.8 – Settlement Hierarchy – Population and Housing Unit Targets Q1-2023 to Q2-2028

| Settlement Type | Settlement Name | Census 2016 Population | Settlements percentage per total County population | 2021 Population Estimate (based on % growth from 2011-2016) | Housing & Population Target % | Population Target 2023 to 2028 (end of Q4) (persons) | Housing Target 2023 to 2028 (end of Q4) (units) in accordance with HSTGs | Residential Zoned Land Requirement (ha) | Target Residential Density (UPH) |
|-------------------------------------|------------------------|------------------------|--|---|-------------------------------|--|--|---|----------------------------------|
| County | Kildare | 222,504 | | 235387 | | 260533 | 9144 | | |
| Key Town | Naas | 21,393 | 9.60% | 22632 | 14.9% | 3747 | 1362 | 40 | 35-50 |
| | Maynooth (MASP) | 14,585 | 6.60% | 15429 | 10.90% | 2741 | 997 ^a | | 35-50 |
| Self-Sustaining Growth Towns | Newbridge | 22,742 | 10.20% | 24059 | 11.60% | 2917 | 1061 | 35 | 35-50 |
| | Leixlip | 15,504 | 7% | 16402 | 10.20% | 2565 | 933 | 31 | 35-50 |
| | Kildare Town | 8,634 | 3.90% | 9134 | 4.70% | 1182 | 430 | 14 | 35-40 |
| | Athy | 9,677 | 4.30% | 10237 | 4.80% | 1207 | 439 | 15 | 35-40 |
| Self-Sustaining Towns | Celbridge | 20,288 | 9.10% | 21463 | 10.00% | 2515 | 914 | 30 | 35-40 |
| | Kilcock | 6,093 | 2.70% | 6446 | 4.00% | 1006 | 366 | 12 | 35-40 |
| | Monasterevin | 4,246 | 1.90% | 4492 | 2.60% | 654 | 238 | 8 | 35-40 |
| | Clane | 7,280 | 3.27% | 7702 | 2.40% | 604 | 219 | 7 | 35-40 |
| Towns | Sallins | 5,849 | 2.62% | 6188 | 1.90% | 478 | 174 | 6 | 35-40 |
| | Kilcullen | 3,710 | 1.70% | 3925 | 2.50% | 629 | 229 | 8 | 35-40 |
| | Kill | 3,348 | 1.50% | 3542 | 1.30% | 327 | 119 | 4 | 35-40 |
| | Prosperous | 2,333 | 1.04% | 2468 | 1.00% | 251 | 91 | 3 | 30-35 |
| | Rathangan | 2,611 | 1.20% | 2762 | 0.90% | 226 | 82 | 3 | 30-35 |
| | Castledermot | 1,475 | 0.70% | 1560 | 0.50% | 126 | 46 | 2 | 30-35 |
| | Derrinturn | 1,602 | 0.70% | 1695 | 0.60% | 151 | 55 | 2 | 30-35 |

It is noted that in Chapter 2 it states that “The aim for this Plan is to co-locate employment centres near homes and communities, thereby reducing the need for unsustainable commuting patterns into, within or outside of the county. This can and will be achieved in a number of ways including;

- (i) Zoning lands for employment type uses throughout the County through the Local Area Plan process.
- (ii) Continuing to work with key stakeholders to identify ways of attracting investors and employers to locate in Kildare in partnership with the Kildare Local Enterprise Office and the IDA.
- (iii) Recognise the highly skilled labour force in situ in the county and to continue to work in partnership with key educational institutions such as NUI Maynooth and the KWETB to further improve the county’s labour force.
- (iv) Developing a co-working hub strategy for the County, which reduces the need for commuting and creates a dynamic environment for startups

Critically, it will be an action of this Plan to monitor the quantum of undeveloped lands as set out in Table 1 above in order to determine whether it is necessary to identify and zone additional lands for employment purposes having regard to the employment hierarchy as set out above.”

This site, given the proposed multiple uses and vacant nature is ideal to achieve this goal it will also fulfil the ambition of 2.6 to enable compact growth. There is support from existing employers in the area as set out above with an existing skilled workforce in the vicinity, necessitating the siting of Endress+Hauser in Kill. This is in line with ST K10 which states that “It is an objective of the Council to facilitate and encourage the expansion of the established enterprises operating in Kill and ensure that future development is compatible with the character and scale of the village.”

The expansion of employment in Kill would stem the outbound flow of commuters from Kildare into Dublin and Meath, tackling the issue of Kildare having the 6th highest rate of commuters in Ireland. It will also allow Kill to develop in line with section 2.15.5 which states that “The towns of Sallins, Kilcullen, Kill Prosperous, Rathangan, Castledermot and Derrinturn will continue to improve their economic offering through small scale industries, traditional natural and resource assets including food, energy and tourism.”

This ambition is further reinforced through the provision of a new roads' objective to the north of this site to provide for commercial and industrial traffic in this area. The improvement in the road network within the area, providing greater connectivity to the N7 and the wider area results in Kill as an ideal location for future development in terms of employment and residential development.

It is therefore considered appropriate the mix of residential and commercial uses for this site is an appropriate use of this vacant and redundant site.

3.0 Proposed re-zoning

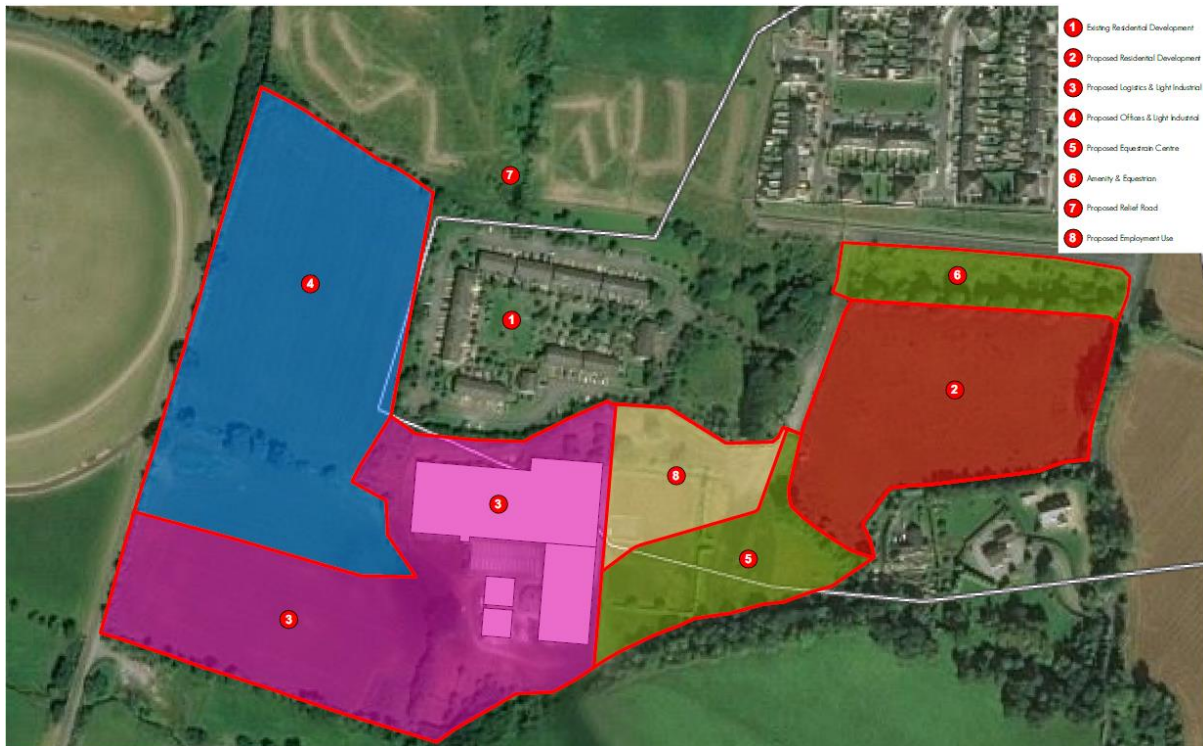
We request Kildare County Council in the new Development Plan 2023 – 2029 rezone the subject site to 3 separate zonings:

Northeast of the site (indicated as number 2): Be zoned "C" for New Residential with the zoning objective *"To provide for new residential development and associated ancillary services. Permission may also be granted for home based economic activity within this zone, subject to the preservation of residential amenity and traffic considerations. New residential areas should be developed in accordance with a comprehensive plan detailing the layout of services, roads, pedestrians and cycle routes and the landscaping of open space."*

South central area and north of the site (indicated as numbers 5 and 6): Be retained "V" as amenity and equestrian use with the zoning objective *"The purpose of this zoning is to facilitate the further development of Kill International Equestrian Centre. The primary use within this zone is equestrian related activities such as stabling, indoor and outdoor performance arenas, hay barns, veterinary centre and associated offices and car parking. A limited amount of self-catering accommodation associated with the equestrian may be acceptable in this land use zoning."* It is appropriate for this area to be reduced to enable the equine-based industry at Goffs to reach its full potential and to ensure there is no conflict between the two areas.

Western area, and north central area (indicated by numbers 3, 4 and 8): Be rezoned "T" *"General Development This zoning provides for a wide range of uses including office, leisure, residential, retail and light industrial/ employment use. In this zone, it is important to avoid abrupt transitions in scale and use at the boundary of adjoining land use zones and also to avoid developments that would be detrimental to amenity."*

These proposed rezonings is justified in the context of meeting the medium and long term growth of Kill to 2029 and beyond, accommodating both residential, equestrian and commercial development in the area in line with growth projections.



4.0 Conclusion

Kill is strategically positioned to benefit from local, national and international markets due to its excellent transport links to the N7, Naas and Dublin. It also has the benefit of planned future road works in the area. These combined factors result in a town which is highly sustainable and could, through appropriate managed development, enable the development of a truly compact, walkable town, where people can live and work within 15 minutes of each other.

The rezoning of the equestrian site would enable the best use of existing developed land beside the existing town for reuse as active commercial and residential uses in a highly sustainable and suitable location, bringing a vacant, derelict site back into active use.

Through the appropriate planning and development of sites within the existing urban boundary of Kill it could be a compact, smart, sustainable and inclusive town with both economic and residential growth for the area. It is also the intention of Kildare in the last Development Plan to improve the road network in the Kill area, this should be continued within the new development plan.

We trust that the planning authority will take on board the above submission recommending an increase in the number of dwellings proposed for this town in the new Development Plan. We would also like to see the Development Plan provide for and take advantage of existing regeneration sites and opportunities within Kill to provide for additional residential, enterprise and employment in this sustainable location for the residents of Kill along with the wider Kildare area.

Yours Sincerely,

Trevor Sadler

Enclosed:

Meitheal Architects' submission of masterplan
Note from Flood Risk Ireland