

**DOWNEY**

29 Merrion Square, D02RW64

# **DEVELOPMENT PLAN SUBMISSION**

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**Draft Kildare Development Plan 2023 – 2029  
Stage 2 Consultation**

**On behalf of: McGrath Group**

**May 2022**

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## 1.0 INTRODUCTION

Downey, Chartered Town Planners, 29 Merrion Square, D02 RW64, have prepared this submission to the draft Kildare County Development Plan 2023-2029 on behalf of the McGrath Group. This written submission is made in response to an invitation for comments from interested parties by Kildare County Council. This submission is being made within the specified timeframe for submissions i.e., 24<sup>th</sup> of May 2022, as set out on the Draft Development Plan's website.

The intended purpose of this submission is to provide a comprehensive view of the benefits of co-living development in the context of the draft Kildare County Development Plan 2023-2029. This analysis is based on the existing and emerging population of the County and in particular the educational and economic hub of Maynooth, a Key Town within the Metropolitan area.

## 2.0 PLANNING LEGISLATION

Section 9 of the Planning and Development Act 2000 (as amended) provides that, subject to the requirements set out in Section 9, 10 and 11 of the Act, that a planning authority must adopt a new Development Plan every six years. The contents of the Development Plan are set out within Section 10 of the Planning and Development Act 2000 (as amended) and must include a strategy for the proper planning and sustainable development of the area of the Development Plan and shall consist of a written statement and a plan or plans indicating the development objectives for the area in question. The process for the preparation of the draft Development Plan is contained within Section 11 of the Planning and Development Act 2000 (as amended) which states:

*"11.—(1) Not later than 4 years after the making of a development plan, a planning authority shall give notice of its intention to review its existing development plan and to prepare a new development plan for its area.*

*(2) A notice under subsection (1) shall be given to the Minister, any prescribed authorities, any adjoining planning authorities, the Board, any relevant regional authority and any town commissioners and city and county development boards within the functional area of the authority and shall be published in one or more newspapers circulating in the area to which the development plan relates and shall—*

*(a) state that the planning authority intends to review the existing development plan and to prepare a new development plan,*

*(b) indicate that submissions or observations regarding the review of the existing plan and the preparation of a new development plan may be made in writing to the planning authority within a specified period (which shall not be less than 8 weeks),*

*(c) indicate the time during which and the place or places where any background papers or draft proposals (if any) regarding the review of the existing plan and the preparation of the new development plan may be inspected.*

*(3) (a) As soon as may be after giving notice under this section of its intention to review a development plan and to prepare a new development plan, a planning authority shall take*

*whatever additional measures it considers necessary to consult with the general public and other interested bodies.*

*(b) Without prejudice to the generality of paragraph (a), a planning authority shall hold public meetings and seek written submissions regarding all or any aspect of the proposed development plan and may invite oral submissions to be made to the planning authority regarding the plan.*

*(c) In addition to paragraphs (a) and (b), a planning authority shall take whatever measures it considers necessary to consult with the providers of energy, telecommunications, transport and any other relevant infrastructure and of education, health, policing and other services in order to ascertain any long-term plans for the provision of the infrastructure and services in the area of the planning authority and the providers shall furnish the necessary information to the planning authority.*

*(4) (a) Not later than 16 weeks after giving notice under subsection (1), the manager of a planning authority shall prepare a report on any submissions or observations received under subsection (2) or (3) and the matters arising out of any consultations under subsection (3).*

*(b) A report under paragraph (a) shall—*

*(i) list the persons or bodies who made submissions or observations under this section as well as any persons or bodies consulted by the authority,*

*(ii) summarise the issues raised in the submissions and during the consultations, where appropriate,*

*(iii) give the opinion of the manager to the issues raised, taking account of the proper planning and sustainable development of the area, the statutory obligations of any local authority in the area, and any relevant policies or objectives for the time being of the Government or of any Minister of the Government, and (iv) state the manager's recommendations on the policies to be included in the draft development plan.*

*(c) A report under paragraph (a) shall be submitted to the members of the planning authority, or to a committee of the planning authority, as may be decided by the members of the authority, for their consideration.*

*(d) Following the consideration of a report under paragraph (c), the members of the planning authority or of the committee, as the case may be, may issue directions to the manager regarding the preparation of the draft development plan, and any such directions must take account of the statutory obligations of any local authority in the area and any relevant policies or objectives for the time being of the Government or of any Minister of the Government, and the manager shall comply with any such directions.*

*(e) Directions under paragraph (d) shall be issued not later than 10 weeks after the submission of a report in accordance with paragraph (c).*

*(f) In issuing directions under paragraph (d), the members shall be restricted to considering the proper planning and sustainable development of the area to which the development plan relates.*

*(5) (a) The manager shall, not later than 12 weeks following the receipt of any directions under subsection (4)(d), prepare a draft development plan and submit it to the members of the planning authority for their consideration.*

*(b) The members of a planning authority shall, as soon as may be, consider the draft development plan submitted by the manager in accordance with paragraph (a).*

*(c) Where the draft development plan has been considered in accordance with paragraph (b), it shall be deemed to be the draft development plan, unless, within 8 weeks of the submission of the draft development plan under paragraph (a), the planning authority, by resolution, amends that draft development plan.”*

This submission to the draft of the Development Plan is being made in accordance with Section 11(2)(b) and 3(b) of the Planning and Development Act 2000 (as amended) and is being submitted within the specified timeframe (24<sup>th</sup> May 2022) as set out in the Draft Kildare County Development Plan 2023-2029 public notice.

### **3.0 PLANNING POLICY CONTEXT**

#### **3.1 Housing for All (2021)**

In September 2021, the Government launched *Housing for All*, a plan to increase the supply of housing to an average of 33,000 per year over the next decade. The plan provides for an optimal mix of social, affordable, and private housing for sale and rent. These measures are supported by over €4 billion in guaranteed State funding every year, the highest ever level of government investment in building social and affordable housing. The plan also includes measures to support the availability of the land, workforce, funding, and capacity to enable both the public and private sectors to meet the targets.

The plan is based on four pathways, leading to a more sustainable housing system:

- Support homeownership and increase affordability.
- Eradicate homelessness, increase social housing delivery, and support social inclusion.
- Increase new housing supply.
- Address vacancy and make efficient use of existing stock.

Overall, the housing supply will have to increase to 33,000 new units, on average, per annum up to and including 2030. This will include, on average, 10,000 social housing units, 4,000 homes for Affordable Purchase, 2,000 Cost Rental homes and 17,000 private homes over the lifetime of the plan (to the end of 2030) the 300,000 required homes are expected to consist of: 90,000 social homes; 36,000 Affordable Purchase homes, 18,000 ‘Cost Rental’ homes and approximately 156,000 private homes. One of the key measures in achieving this is to use vacant and underutilised land within Town Centres and built-up urban areas and to provide a mix of tenure to accommodate all cohorts of society.

#### **3.2 The Housing Agency Statement of Strategy 2022-2024**

Launched in late January 2022, the Housing Agency’s Statement of Strategy, outlines how more affordable housing, increasing the supply of social and private homes and addressing social inclusion issues such as homelessness and ageing will be the priorities for the work of the Housing Agency over

2022-2024. The Statement of Strategy frames the work of The Housing Agency under three broad themes:

- Being a centre for housing knowledge;
- Bridging housing supply and demand; and,
- Building capacity for housing.

It also outlines how, over the coming years, the Housing Agency will use research, informed policy insights and data to work *“to achieve a housing system that meets the housing needs of the nation and promotes viable, sustainable communities”*.

The Housing Agency’s Strategic Plan 2022-2024 has been framed in the context of supporting Housing for All, the Government’s housing plan for Ireland and key trends in the housing system including:

- Diverse and changing housing needs for people living in Ireland.
- Long-term government policy and strategic planning for the Irish housing system.
- A continuing focus on building inclusive, sustainable communities.

It is submitted that the evidence-based approach outlined in this submission is consistent with the overarching strategy of the Housing Agency, where providing a diverse range of residential tenure will meet the needs of the future population of Kildare County, including the need for co-living developments within the County.

### 3.3 National Planning Framework (2018)

The National Planning Framework (NPF) is the national planning policy document. It replaced the previous National Spatial Strategy (NSS) as the primary national policy framework. Announced in 2018, the NPF is designed to improve the effectiveness of public investment in infrastructure and other relevant services around the country, including facilitating compact growth within existing settlements, reducing the expansion of sprawl led development and revitalising underutilised sites.

The NPF recognises the importance of making better use of under-utilised land and buildings, including vacant and under-occupied buildings, and encouraging higher housing densities where they are better serviced by existing facilities and public transport. The NPF under the ‘National Policy Objectives’ states that it is the policy to implement the following criteria:

**National Policy Objective 3a** – *“Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements”*.

**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”*.

**National Policy Objective 33:** *“Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.”*

**National Policy Objective 35** – *“Increase residential density in settlements, through a range of measures including reductions in vacancy, reuse of existing buildings, infill development schemes, area or site-based regeneration and increased building heights”.*

Implementing the ‘National Policy Objectives’ outlined above is viewed as a national priority and of strategic importance. It can be stated that providing a diverse range of residential development, including co-living developments on brownfield sites within existing urban areas will contribute to achieving the objectives of the NPF.

### 3.4 National Development Plan 2018-2027

The National Development Plan sets out the investment priorities that will underpin the successful implementation of the National Planning Framework (NPF). This will guide national, regional, and local planning and investment decisions in Ireland over the next two decades to cater for an expected population increase of over 1 million people.

Resolving the systemic factors underlying the current housing crisis is at the heart of the NPF and reflecting this, housing and sustainable urban development is a priority for the National Development Plan. In this regard, the NDP states that there is a *“need to provide in excess of half-a-million more homes over the period to 2040 corresponds to a long-term trend of 25,000 new homes every year. A higher level of output is needed in the short to medium-term to respond to the existing deficit that has given rise to the housing crisis.”*

Furthermore, the NDP states that, *“the continuation of existing patterns of development accentuates the serious risk of economic, social, and environmental unsustainability through, for example, placing more distance between where people work and where people live, and increasing energy demand. The NPF highlights the urgent requirement for a major uplift of the delivery of housing within the existing built-up areas of cities and other urban areas. It has a particular focus on brownfield development, targeting derelict and vacant sites that may have been developed before but have fallen into disuse.”*

There are several strategic outcomes identified within the NDP which are relevant to this submission. Such outcomes include:

**National Strategic Outcome 1: Compact Growth** – *“This outcome aims to secure the sustainable growth of more compact urban and rural settlements supported by jobs, houses, services and amenities, rather than continued sprawl and unplanned, uneconomic growth. This requires streamlined and co-ordinated investment in urban, rural, and regional infrastructure by public authorities to realise the potential of infill development areas within our cities, towns and villages. This will give scope for greater densities that are centrally located and, in many cases, publicly owned, as well as bringing life and economic activity back into our communities and existing settlements.*

*Creating critical mass and scale in urban areas with enabling infrastructure, in particular increased investment in public and sustainable transport and supporting amenities, can act as crucial growth drivers. This can play a crucial role in creating more attractive places for people to live and work in, facilitating economic growth and*

*employment creation by increasing Ireland’s attractiveness to foreign investment and strengthening opportunities for indigenous enterprise.”*

**National Strategic Outcome 4: Sustainable Mobility** – *“The expansion of attractive and sustainable public transport alternatives to private based car transport will reduce congestion and emissions and enable the transport sector to cater in an environmentally sustainable way for the demands associated with longer term population and employment growth envisaged under the NPF. Furthermore, the provision of safe alternative active travel options such as segregated cycling and walking facilities can also help alleviate congestion and meet climate action objectives by providing viable alternatives and connectivity with existing public transport infrastructure”.*

Particularly in built-up urban areas of Cities and Towns, high-density residential developments will provide sustainable residential development near high frequency bus networks, and cycling infrastructure, all of which promotes compact urban growth and a good quality of life in our urban areas.

### 3.5 Regional Spatial and Economic Strategy 2019-2031 (RSES)

The Regional Spatial and Economic Strategy (RSES) was published by the Eastern and Midland Regional Assembly. The RSES outlines the long-term regional level strategic planning and economic framework in support of the National Planning Framework for the period 2019-2031, by identifying regional assets, opportunities, pressures and constraints and providing a framework for investment to better manage spatial planning and economic development throughout the Eastern and Midland Region.

With a vision *“to create a sustainable and competitive Region that supports the health and wellbeing of our people and places, from urban to rural, with access to quality housing, travel and employment opportunities for all”*, the RSES, in conjunction with the NPF, introduces the Core Region as *“the peri-urban ‘hinterlands’ in the commuter catchment around Dublin, which covers the Mid-East counties of Louth, Meath, Kildare and Wicklow, extending down the East Coast and into parts of the Midlands. More than 550,000 people reside in the Core Region in 2016.”* As reiterated in the RSES, *“the Mid-East has seen the highest ten-year population growth to 2016 in the Region and contains some of the youngest and fastest growing towns in the state.”*

The Key Towns of Swords, Maynooth, Bray, Navan, Naas, Wicklow-Rathnew, Longford, Mullingar, Tullamore, Portlaoise and Graiguecullen (Carlow) are large economically active county towns, with high quality transport links that play an important service role for their catchments. Further to this, it is acknowledged that there are number of settlements, which also have strong service and employment functions, some of which may have the potential and ambition to become drivers for growth in the county or to play a key role in providing services and employment to their local catchments.

Maynooth is identified as a key town and has significant residential capacity to the north and west of the Town near Maynooth University and can provide for the sustainable, compact, sequential growth and urban regeneration in the town core by consolidating the built footprint through a focus on regeneration and development of identified Key Town centre infill / brownfield sites.



The RSES states that, *“in order to achieve these targets and the delivery of new homes within the footprint of existing settlements, active land management responses are required to ensure that land and building resources within existing settlements are used to their full potential.”*

In this regard, *“growth enablers for the Core Region include:*

- *To promote continued growth at more sustainable rates, while providing for increased employment and improved local economies, services and functions to allow towns become more self-sustaining and to create the quality of life to attract investment.*
- *Commensurate population and employment growth in Key towns, coupled with investment in enabling transport, infrastructure and services to facilitate the achievement of compact growth targets of at least 30% of all new homes to be within the existing built-up area of settlements.*
- *‘Catch up’ investment to promote consolidation and improvement in the sustainability of those areas that have experienced significant population growth but have a weak level of services and employment for their residents.*
- *Diversification and specialisation of local economies with a focus on clustering, smart specialisation, place making and urban regeneration to create the quality of life to attract FDI and indigenous investment and increase high value knowledge-based employment including second site and relocation opportunities.*

With respect to the above, building upon the strength of key Towns like Maynooth would facilitate development at a more sustainable rate in close proximity to high quality public transport and employment centres.

### **3.6 Sustainable Urban Housing: Design Standards for New Apartments (2020)**

The *“Sustainable Urban Housing: Design Standards for New Apartments”* (Apartment Guidelines, 2020) build on the content of the 2018 apartment guidance, much of which remains valid, particularly regarding design quality safeguards such as internal space standards for apartments, internal storage, and amenity space. For the purposes of determining planning applications.

The Guidelines state that: *“it is critical to ensure that apartment living is an increasingly attractive and desirable housing option for a range of household types and tenures.”*

The Guidelines also state that *“aspects of previous apartment guidance have been amended and new areas addressed in order to:*

- *“Enable a mix of apartment types that better reflects contemporary household formation and housing demand patterns and trends, particularly in urban areas.*
- *make better provision for building refurbishment and small-scale urban infill schemes.*
- *address the emerging ‘build to rent’ and ‘shared accommodation’ sectors; and*
- *remove requirements for car-parking in certain circumstances where there are better mobility solutions and to reduce costs”.*

The Guidelines acknowledge that Ireland is a long way behind European averages in terms of the numbers of households living in apartments, especially in our cities and larger towns. Given the gap between Irish and European averages in numbers of households living in apartments and the

importance of addressing the challenges of meeting the housing needs of a growing population in our key cities and towns and by building inwards and upwards rather than outwards, apartments need to become the norm for urban housing solutions.

As stated within the Guidelines, *“ongoing demographic and societal changes mean that in addition to families with children, the expanding categories of household that may wish to be accommodated in apartments include:*

- **Young professionals and workers generally;**
- *Those families with no children;*
- *‘Downsizers’; and,*
- *Older people, in both independent and assisted living settings.”*

### **Co-Living/shared Living**

Co-Living or Shared Living is also detailed within the guidelines as a ‘niche’ form of residential development to provide variety of tenure within urban areas. Shared accommodation/Co-living is described within the guidelines as:

*“The shared accommodation/co-living format comprises professionally managed rental accommodation, where individual rooms are rented within a commercial development that includes access to shared or communal facilities and amenities”.*

The 2020 Guidelines outlined that the department will *“monitor the emerging shared accommodation sector and may issue further additional technical updates to this document as appropriate. In this context and further to Ministerial review, prior to issuing these Guidelines it was determined that there is a sufficient quantum of shared accommodation/co-living units either permitted or subject to consideration within the planning system, that may be built out to demonstrate and prove this concept, without impacting the housing system.”*

### **Specific Planning Policy Requirement 9**

*“There shall be a presumption against granting planning permission for shared accommodation/co-living development unless the proposed development is either:*

- i. Required to meet specific demand identified by a local planning authority further to a Housing Need and Demand Assessment (HNDA) process; or,*
- ii. On the date of publication of these updated Guidelines, a valid planning application to a planning authority, appeal to An Bord Pleanála, or strategic housing development (SHD) planning application to An Bord Pleanála, in which case the application or appeal may be determined on its merits.”*

In this regard, it is important to note that this new format of rental accommodation, which has emerged in the private residential development sector in recent years, comprises professionally managed rental accommodation, where individual rooms are rented within a centrally managed development that includes access to shared or communal facilities and amenities. Unlike most other forms of residential accommodation, co-living is generally intended for occupation for short lease

periods of up to a year in duration, by young professionals. It is considered that certain large towns and Cities are equipped with the necessary resources and infrastructure which would allow these types of developments to support sustainable growth in the context of the NPF.

It continues to be important that the Irish planning system is equipped to appropriately address, new development formats such as co-living. In accordance with SPPR9, we would urge Kildare County Council to consider this type of tenure in assessing the needs of the growing population of the County.

### 3.7 Kildare County Development Plan 2017-2023

As stated in the County Development Plan, *“all towns, villages, settlements, rural nodes (as appropriate) should be developed in a sequential manner, with suitable undeveloped lands closest to the core and public transport routes being given preference for development in the first instance. Zoning shall extend outwards from the centre of an urban area with strong emphasis placed on encouraging infill opportunities. Areas to be zoned should generally be contiguous to existing zoned development lands.”*

Stated in the County Development Plan, *“the population target for Kildare to the end of the Plan period is 253,600, giving rise to the need for 32,497 additional residential units by 2023. This equates to a population increase of 17% over 2011 levels.*

*The distribution of housing targets over the plan period, in accordance with the Core Strategy is outlined in the Table below. It should be noted that in calculating unit projections, the RPGs apply a standardised vacancy rate of 6.5% to reflect the need for the market to operate efficiently and to allow for the normal turnover of the housing stock.*

*In the RPGs the four Metropolitan towns of Maynooth, Celbridge, Leixlip and Kilcock must accommodate a minimum of 35% of the total growth rate allocation for the county. This target will increase their share of the total population in the county from 25% in 2011 to 27% in 2023.*

As marked on the Table below, County Development Plan planned to accommodate 35% (or 11,406 no. dwellings) within the metropolitan towns, including Maynooth.

	Settlement	Housing Unit Allocation 2016-2023	% County Total	% Allocation Metropolitan/Hinterland
<b>Metropolitan Allocation</b>	Leixlip Maynooth Celbridge Kilcock	11,406	35%	35%
<b>Hinterland Town Allocation</b>	Naas Newbridge Kildare Monasterevin Athy Kilcullen	13,356	41%	65%
<b>Rural Areas</b>	Small Towns, Villages, Rural Settlements, Rural Nodes, One-off Rural Housing	7,727	24%	
<b>Total</b>		<b>32,497</b>	<b>100%</b>	

Figure 1. Housing Allocation 2016-2023 extracted from the County Development Plan

### 3.8 Maynooth Local Area Plan

The Maynooth Local Area Plan 2013–2019 has been prepared in accordance with the requirements and provisions of the Planning and Development Act 2000 as amended. It sets out an overall strategy for the proper planning and sustainable development of Maynooth in the context of the Kildare County Development Plan 2011–2017 and the Regional Planning Guidelines for the Greater Dublin Area 2010–2022. It is also informed by Ministerial Guidelines published pursuant to Section 28 of the Planning and Development Act 2000 as amended together with EU requirements regarding Strategic Environmental Assessment and Appropriate Assessment.

At national level, Maynooth is identified as a key town within the metropolitan area. Maynooth traditionally has a very young population. The 1996 census indicated that almost 30% of the town's population was aged between 20 and 29 years compared to 15% for the state as a whole. The 2002 census revealed a similar trend with 25.51% of the population in the 15–24 bracket compared to the 16.38% average for the state. Table 3 below reveals that this trend is also evident in the 2011 census results. The student population of the town is a big factor in the high proportion of young adults in the town. In general, the population of Maynooth is quite young.

It has been noted that Maynooth has a large proportion of its population of working age. It also has a number of locational advantages such as close proximity to large employers like NUI Maynooth, Intel and Hewlett Packard and excellent transport links to Dublin. It is evident from Table 8 that a large proportion of the workforce in Maynooth are employed in high skilled jobs in the trade, commerce and public service sectors.

It is envisaged that Maynooth will continue to grow over the short to medium term to achieve a critical mass which will support competitiveness, sustainability and create opportunities for economies of scale. Its development will be complemented with a range of employment, recreational, cultural, retail and educational facilities appropriate for a town of its size. It is envisaged that the National University of Ireland Maynooth will continue to grow and develop its facilities while also creating the environment required to develop further research based employment opportunities in the town.

### 3.9 Draft Kildare County Development Plan 2023-2029

Students are an increasingly important part of the housing landscape in Kildare, particularly in Maynooth. According to Census 2016, 20,559 residents of County Kildare reported their principle economic status as students (12.2% of all those aged 15 and over). Also recorded by Census 2026 was that 25.3% of the population of Maynooth town over the age of 15 are students, compared to an average of c. 11% for the other towns within the vicinity, including Leixlip and Kilcock which are connected to Maynooth via a rail line and also compared to the state average of 11.4%. Maynooth University is the only third level institution in County Kildare and it has a total enrolment of 13,700 students.

**Objective HO O36** Support the provision of purpose-built student accommodation in appropriate locations and of appropriate design (including adequate communal facilities and external communal space), to meet demand for student housing in accordance with the National Student Accommodation Strategy.

**Objective HO O37** Support increased supply of student accommodation in Maynooth, Kilcock, Leixlip and Celbridge to meet the anticipated student accommodation demand generated by Maynooth University. Applications for change of use from student housing to any other form of housing will be resisted without adequate demonstration that an over-provision of student housing exists.

**15.4.11 Purpose Built Student Accommodation:** The Government has indicated (September 2021) the critical need for purpose-built student accommodation (PBSA) to be available to meet the needs of students in third level education. As per PL05/2021 and PL8/2016, the Planning Authority will apply a flexible approach in respect of any planning conditions related to use/occupation of student accommodation.

Purpose-built student accommodation should not be used for short-term residential accommodation indefinitely, and it should be safeguarded for use by students and other people related to higher education institutes during the academic year. The removal of student accommodation from availability for student use runs contrary to the National Student Accommodation Strategy.

The Council supports the provision of high-quality, professionally managed, purpose built third level student accommodation, either on campus or in accessible locations adjacent to quality public transport corridors and active travel routes in a manner which respects the residential amenities of the locality.

The Council will ensure that student specific accommodation is:

- Not used for residential accommodation of a permanent nature.
- Safeguarded for use by students and other persons related to higher education institutes during the academic year; and
- Capable of being used for legitimate occupation by other persons/groups during holiday periods, when not required for student accommodation purposes

**15.4.9 Shared Accommodation / Co-Living Developments** Shared accommodation/co-living developments are professionally managed rental accommodation, where individual rooms are rented within a commercial development that includes access to shared or communal facilities and amenities. In accordance with SPPR 9 there shall be a presumption against granting planning permission unless a need is identified to meet a specific demand identified in the Housing Need Demand Assessment (HNDA). The HNDA prepared as part of the Plan review did not identify a specific need for this type of residential development in Kildare.

The Housing Need Demand Assessment, as drafted, contends that the HNDA has reviewed and confirmed that no co-living developments are required over the revised term of the Kildare County Development Plan (2023 to 2029). Given the proportion of student population within the County and in particular Maynooth and the need for these students to access accommodation upon graduation or when attended higher education, we would contend that the HDNA should be reviewed in this context.

The provision of co-living or shared accommodation within this area will assist in retaining the newly qualified cohort of the population and allow them to access the numerous employment sectors within the region. This flexibility of tenure is required to ensure a dynamic and sustainable population for the area.

## 4.0 JUSTIFICATION & GROUNDS FOR SUBMISSION

### 4.1 Target Market & Demographics

Co-living (or Shared Accommodation) is a concept that focuses on the creation of high-quality, purpose-built rental accommodation, placing an emphasis on community and social interaction.

The demand for rental accommodation across Ireland, particularly in its urban centres, continues to increase exponentially. Co-living developments could meet the demand for single occupancy, which the standard BTR proposition fails to satisfy.

In an analysis of the potential for co-living in Ireland, KHSK Economic Consultants (2018), identify the following socio-economic factors as key drivers in the growth of co-living accommodation:

- *“Technological progress and the emergence of a sharing economy;*
- *Changes in the structure of demand for housing types arising from the desire for greater mobility and smaller family units;*
- *Increased pressure on space and other resources in cities and the impact of this on prices; and,*
- *The need to address the danger or social isolation that comes with a footloose and urbanised society where traditional family and social ties are more difficult to maintain.”*

Therefore, co-living has the potential to meet the requirements of the change in lifestyle choices that have been influenced by the above factors, to create high-quality homes which are affordable and encourage social integration.

In this regard, a young, economically active population is a promising context of the delivery of a co-living scheme as the collective style of renting typically appeals to this demographic. The emphasis on sociable, collective living that is fostered within co-living developments with communal spaces that encourage residents to engage with one another has been shown to resonate with young professionals. In this sense, co-living is often recognised as an evolved form of student accommodation which graduates, and a large proportion of young professionals, are familiar with. Furthermore, the demographics in Kildare and in particular Maynooth show that the demand is available for co-living schemes and thus the same should be considered for inclusion.

### 4.2 Location of Co-Living Developments

In relation to the location of co-living developments, the 2018 Apartment Guidelines state that, *“in assessing proposals for Shared Accommodation, the planning authority shall therefore have regard to the need for such a type of accommodation in an area with reference to the need to cater for particular employee accommodation needs.”*

It is understood that co-living developments should be located proximate to higher density employment locations, in support of the particular need for the co-living format.

Given the nature of co-living development in an Irish context and also the concept of the ‘15 minute city’ (i.e., to access most daily needs within 15 minutes on foot from home), it is considered reasonable that proposals for co-living development would be located within 15 minutes’ walk (1km radius), or a maximum 15 minutes morning peak hour public transport journey (which would also support some locations on Luas, rail/DART or high quality QBC corridors), of a high density employment cluster.

It would also be appropriate to make provision for a limited number of exceptions, such as co-living development associated with a major hospital or educational campus or for proposals that would constitute a viable use of a Protected Structure. Historic buildings can frequently be subject to layout and structural constraints that render them unsuitable to accommodate standard apartment layouts but may be suited to a more flexible shared accommodation development format.

### 4.3 Co-Living Optimization

Co-living provides a high quality, safe and secure living environment where residents can enjoy their spacious private suite and a combination of high-quality residential amenities and facilities all covered in one monthly bill. It is a cost-effective solution to single occupancy living in Urban areas which cannot be found in any other type of tenure available on the market today.

Media articles and social media posts have raised issue with current proposals for co-living developments within the planning system, much of these concerns relate to the comparison of co-living developments with mainstream housing. There is a misconception that co-living is aimed at families and couples who will remain there in the long-term, this is not the case. Co-living generally attracts young professionals, and graduates, people who are single and the international workforce who may be working in the area temporarily. Most co-living development provide for single occupancy rooms where the individual resident has a greater level of privacy than those house or apartment sharing.

Access points throughout the building are controlled by electronic fob which is monitored from a central management system. Public access is not generally allowed or controlled where agreed. Each floor is generally designed to allow for self-containment without the need to close the entire building. Each private suite is fully equipped with cooking and cleaning facilities, naturally ventilated and has the option of concierge facilities available on request. This ensures the safety and well-being of a resident is maintained should self-isolation be required.

Throughout the Country there are new challenges facing local authorities in providing quality housing and sustainable neighbourhoods. Greater flexibility is needed for the design of homes in the context of home-working and there is a real need for neighbourhoods to become enhanced focal points and service centres for their communities. Co-living developments can provide an alternative design where home-working and community is at the centre of the design.

In addition to all the above, the level of amenities provided by these developments will provide for a standard of living higher than those in other tenures of housing. Furthermore, the opportunity to become part of a community is another aspect which is driving demand for this type of development amongst the 25-39 year cohort. Co-living operators provide a high-quality living environment where residents can work, rest and play. This means that in addition to provision of private accommodation in co-living developments, the extent of additional communal facilities and amenities provided, together with the range of associated events and related organisation on an ongoing basis, are critical to the quality of the development. These factors also differentiate co-living from other more traditional forms of living accommodation and make it an optimised residential typology suited for the urban life.

## 5.0 SAMPLE LOCATION - MAYNOOTH

The Maynooth Local Area Plan 2013–2019 has been prepared in accordance with the requirements and provisions of the Planning and Development Act 2000 as amended. It is understood that this Local Area Plan will be revised once the County Development Plan 2023-2029 has been adopted. The policies and objectives of the Kildare County Development Plan 2023-2029 will be reflected in the revised Maynooth LAP.

At national level, Maynooth is identified as a key town within the metropolitan area.



Figure 2. Housing Allocation 2016-2023 extracted from the County Development Plan

It has been noted that Maynooth has a large proportion of its population of working age. It also has a number of locational advantages such as close proximity to large employers like NUI Maynooth, Intel and Hewlett Packard and excellent transport links to Dublin



According to the current LAP, it is envisaged that Maynooth will continue to grow over the short to medium term to achieve a critical mass which will support competitiveness, sustainability and create opportunities for economies of scale. Its development will be complemented with a range of employment, recreational, cultural, retail and educational facilities appropriate for a town of its size. It is envisaged that the National University of Ireland Maynooth will continue to grow and develop its facilities while also creating the environment required to develop further research based employment opportunities in the town.

## 5.1 Demographic Profile of Maynooth

### 5.1.1 Average Household Size

In the State, the number of private households increased by 2.9% over the Census 2011-2016 with a growth of average household size from 2.73 persons to 2.75 persons which represents a reversal of the long-term decline in average household size in Ireland. This figure stood at an average of 3 persons per households for County Kildare in 2016, which shows a slight increase from 2.9 in 2011. In this context, the average household size in Maynooth stood at 2.9 which comprises 13,925 people living in 4,674 no. households. In line with the County's demographic trending, this is submitted to indicate a slight increase from the average household size of 2.8 in 2011, i.e., 11,931 people living in 4,211 no. households. Thus, the average household size in Maynooth stands marginally above the State average and slightly below the County average.

To be more precise, as illustrated in the Table below, the pattern of family formation in Maynooth is mostly characterised by small sized families, i.e., single- to three-persons households form 63.6% of the overall households residing in Maynooth. This figure is suggested to be mainly driven by the notable population of students, young professionals, and single-size families residing in the town.

*Table 1. Average Number of Persons per Private Household 2016*

Size of household	Households	Persons	% of Total
<b>1 person</b>	766	766	16.4%
<b>2 persons</b>	1,242	2,484	26.6%
<b>3 persons</b>	963	2,889	20.6%
<b>4 persons</b>	1,007	4,028	21.5%
<b>5 persons</b>	500	2,500	10.7%
<b>6 persons</b>	149	894	3.2%
<b>7 persons</b>	26	182	0.6%
<b>8 or more persons</b>	21	182	0.4%
<b>Total</b>	4,674	13,925	100.0%

As illustrated in the Figure below, spatial distribution of single-person households across Maynooth illustrates that the greater households are mainly residing towards the development boundaries of the town and outside the inner core of Maynooth. On the contrary, when moving towards the Maynooth University, St. Patrick's College, and other educational institutions, an intensification of smaller sized households can be observed.

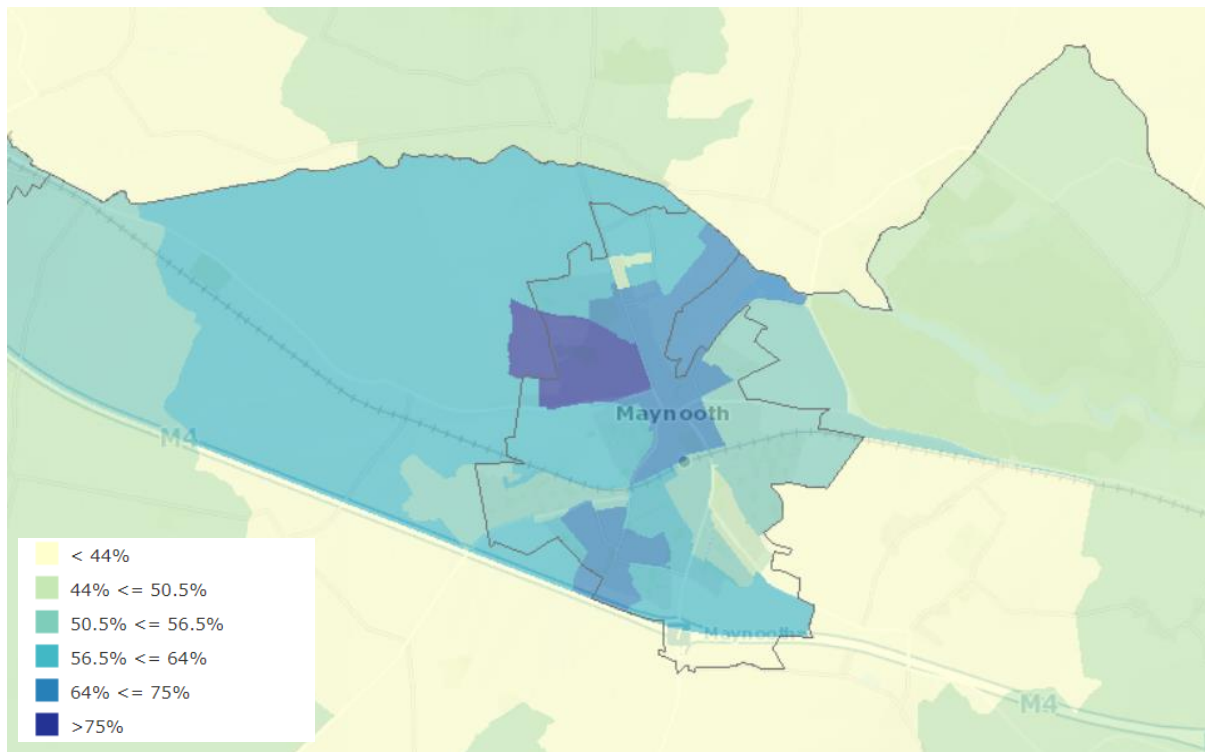


Figure 3. Spatial Distribution of Single-person Households in Maynooth, 2016

However, an overview of the households by number of rooms indicates that the stock of housing in Maynooth is largely comprised of family houses with four and more bedrooms. This reveals an existing gap in housing supply and demand in terms of housing typology, which is suggested to result in house sharing as a growing form of overcrowded accommodation in the coming years.

Co-living or shared accommodation developments can provide an alternative to house sharing where each individual has their own private accommodation with communal facilities to reduce isolation and ensure that each person becomes part of the collective community. This form of tenure provides a more sustainable and safer standard of accommodation than unregulated house sharing.

Table 2. Permanent Private Households by Number of Rooms, 2016

Number of rooms	Households	Persons	% of the total Households
1 room	48	90	1.0%
2 rooms	241	519	5.2%
3 rooms	532	1,381	11.4%
4 rooms	435	1,145	9.3%
5 rooms	1,039	2,885	22.2%
6 rooms	915	2,812	19.6%
7 rooms	619	2,137	13.2%
8 or more rooms	631	2,347	13.5%
Not stated	213	608	4.6%
<b>Total</b>	<b>4,673</b>	<b>13,924</b>	<b>100.0%</b>

### 5.1.2 Age Structure

Investigating the age profile of the town over the intercensal period also confirms the impact of educational institutions, and in particular Maynooth University, on the age structure of this town, where 20-29 age cohort appears as the predominate age group, followed by 30-39 years old and 10-19 years old. While the 30-39 age cohort reflects the share of young professionals from the overall population residing in Maynooth, the 10-19 age cohort suggests a continuation of the existing trend in the coming years.

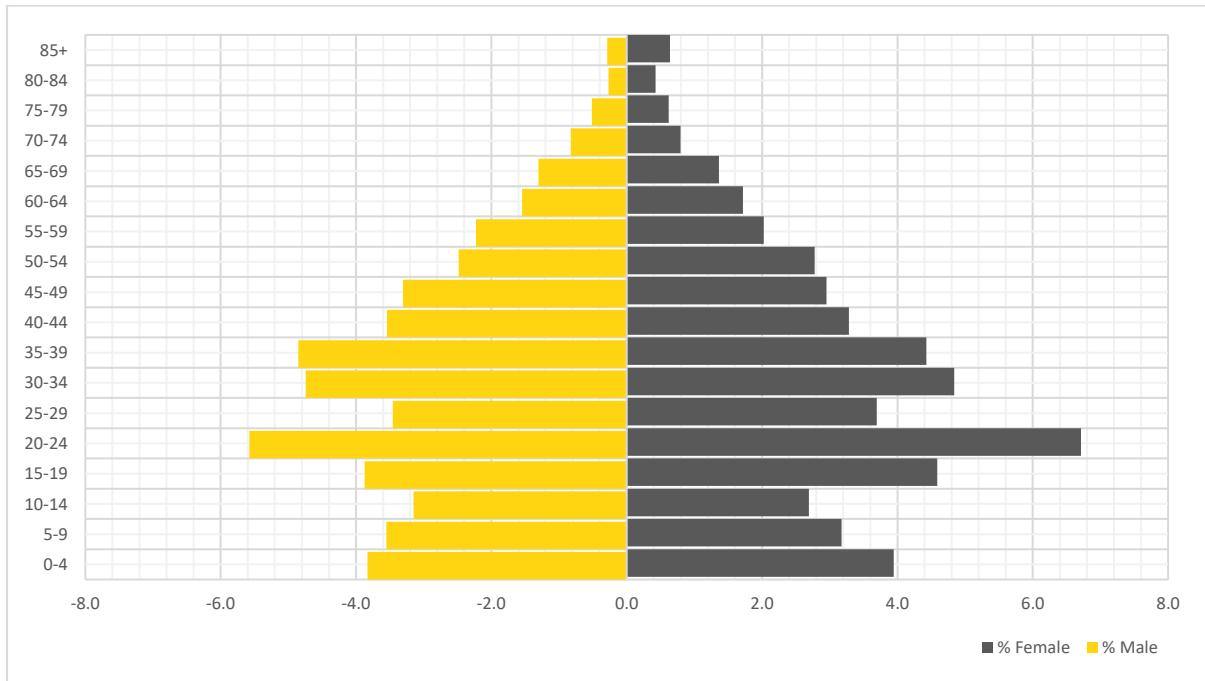


Figure 4. Population Age Pyramid of Maynooth, 2016

With respect to the above, age structure of Maynooth is suggested to be a main driver in directing the housing market in this town, where students, young professionals, and small-sized households form a considerable share of its existing and future housing demand. This is further reinforced by the average household size in Maynooth which stood at 2.9 in 2016, slightly below the County’s figure and with regard to the proposed developments of Maynooth University and St. Patrick’s College in the draft Development Plan is suggested to further decrease over the coming years.

Thus, the need for co-living or shared accommodation is rightfully based upon a housing market characterised by a steadily growing population of students and young professionals that essentially sustains the need for an extended hotel residency rather than conventional housing provision, which can also be translated to the idea of serviced apartments with shared amenities located within the inner town of Maynooth. This is suggested to also free up residentially zoned lands for conventional and family housing provision, tailoring the housing supply to the existing market by providing for a diversity of housing tenure. This is submitted to consequently facilitate smart growth of the town by an efficient use of the lands.

## 5.2 Nature of Employment and Economic Development of Maynooth

According to Census 2016 and as outlined in the draft County Development Plan, “the total Labour Force residing in Kildare is 108,244 which is equivalent to 64.1% (Labour Force Participation Rate) of the total population 15+ (168,944) residing in Kildare. This rate is higher than the State (61.4%), EMRA (63.3%) and Eastern SPA (63%) averages. Relative to other local authorities, Kildare has the 5<sup>th</sup> highest Labour Force in the State the 4<sup>th</sup> highest Labour Force Participation rate. The highest rates in the State are in Fingal (66.9%) and Dublin City (64.7%) and the lowest in Cork City (55.2%) and Donegal (57.3%). Since 2011, there has been an increase of 4,018 (3.8%) to the Labour Force in Kildare. This is similar to the State where the total labour force has increased by 3.2%.”

In Maynooth, 54.6% or 6,372 people were at work and 25.3% or 2,951 people were students in 2016. As illustrated below, 28% of the overall labour force residing in Maynooth are employed in the professional services sector, followed by 25.6% working in commerce and trade. These figures render the nature of employment in Maynooth which is mostly characterised by knowledge-based employment focusing on manufacturing and ICT (see Figure below).

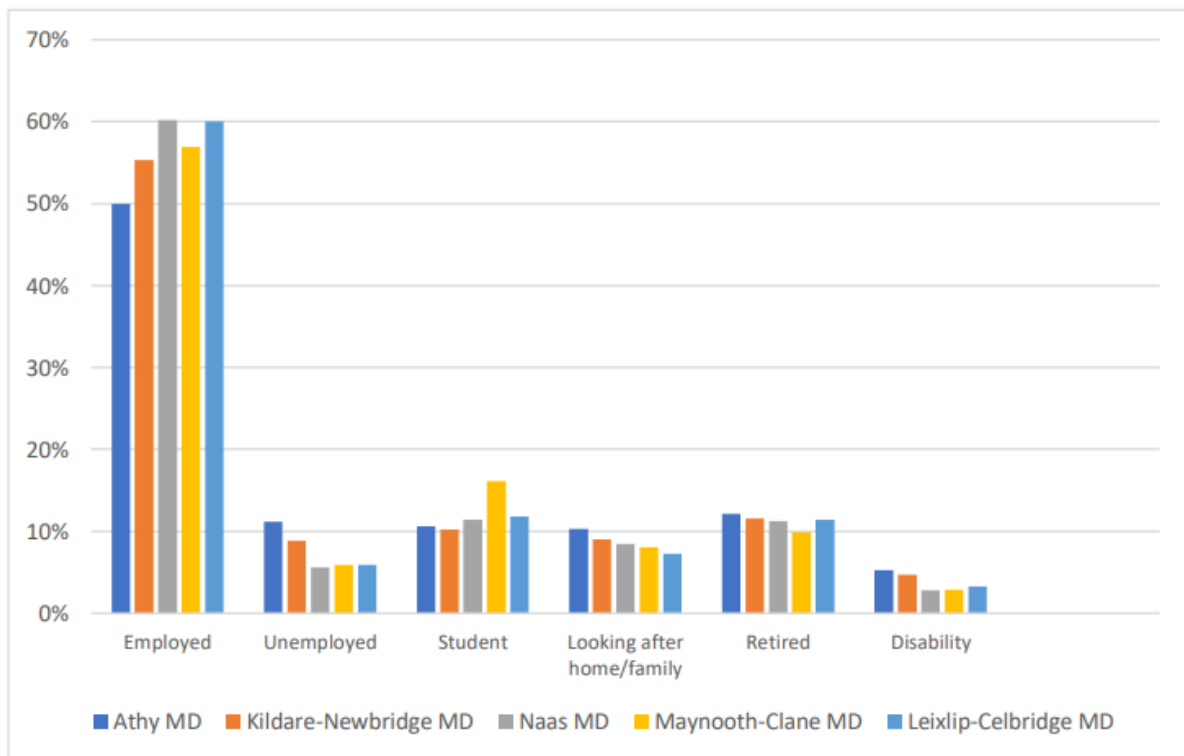


Figure 5. Principal Economic Status for each MD in Kildare County, 2016 (source: draft Development Plan)

As per economic development hierarchy of the draft County Development Plan, this is to be further reinforced by “development of Maynooth University as a leading third level research and educational facility and Development of St Patrick’s College Campus for a mix of uses.” The draft County Development Plan goes on to add that, “the Council is focussed on developing the Key Town of Maynooth as an ‘economic driver’ and ‘strategic employment location’ within the Metropolitan Area Strategic Plan (MASP)...

Employment uses for Maynooth shall focus on the development of Life Sciences, High Tech, Bio Tech, ICT, Research & Development and seek to benefit from synergies with third level institutions including

Maynooth University (MU) and major employers already established in the sub region (Intel, Hewlett Packard). The area can become a centre of excellence in the knowledge-based economy. The objective is to foster a ‘dynamic partnership’ between multi-national companies, indigenous Small and Medium-sized Enterprises (SME’s), and third level institutions such as NUI Maynooth.”

Table 3. Maynooth Population by Sex and Social Class, 2016.”

Industry	Male	Female	Total	% of Total
Agriculture, forestry and fishing	26	8	34	0.5%
Building and construction	286	25	311	4.9%
Manufacturing industries	493	180	673	10.6%
Commerce and trade	903	727	1,630	25.6%
Transport and communications	463	156	619	9.7%
Public administration	236	160	396	6.2%
Professional services	554	1,230	1,784	28.0%
Other	474	451	925	14.5%
<b>Total</b>	<b>3,435</b>	<b>2,937</b>	<b>6,372</b>	<b>100.0%</b>

As illustrated below, the spatial distribution of workers employed in the professional services sector also renders the knowledge-based economy of the town, where educational institutions and in particular Maynooth University, appear as anchor points of development and effectively change the population movement and distribution in this settlement. As shown, this industry of employment is mainly placed in west and north Maynooth and in proximity to the University and railway.

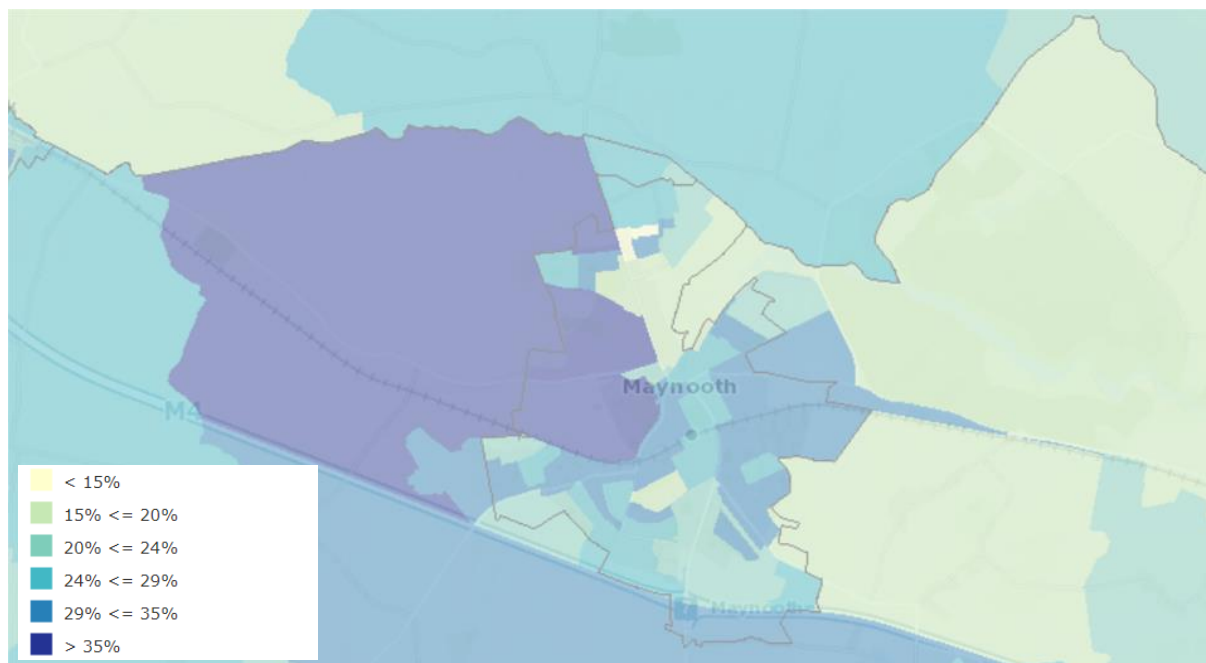


Figure 6. Spatial Distribution of Workers Employed in the Professional Services Sector, 2016

The provision of co-living or shared accommodation within Maynooth Town will provide an alternative for the young professionals working in the area and allow for their future retention and contribution to the economy of the County.

### 5.3 Educational Institutions Role in Maynooth Housing Market

As per the draft County Development Plan, *“with student numbers at Maynooth University expected to increase to 14,500 by 2022, demand for student housing can be expected to increase exponentially in Maynooth and in the adjacent towns of Kilcock and Leixlip, up to and beyond these years.*

*Students are an increasingly important part of the housing landscape in Kildare, particularly in Maynooth. According to Census 2016, 20,559 residents of Kildare County reported their principle economic status as students (12.2% of all those aged 15 and over). Referring to the Figure below, the main concentration of students is in Clane-Maynooth MD (16.1% of all those aged 15 and over).”*

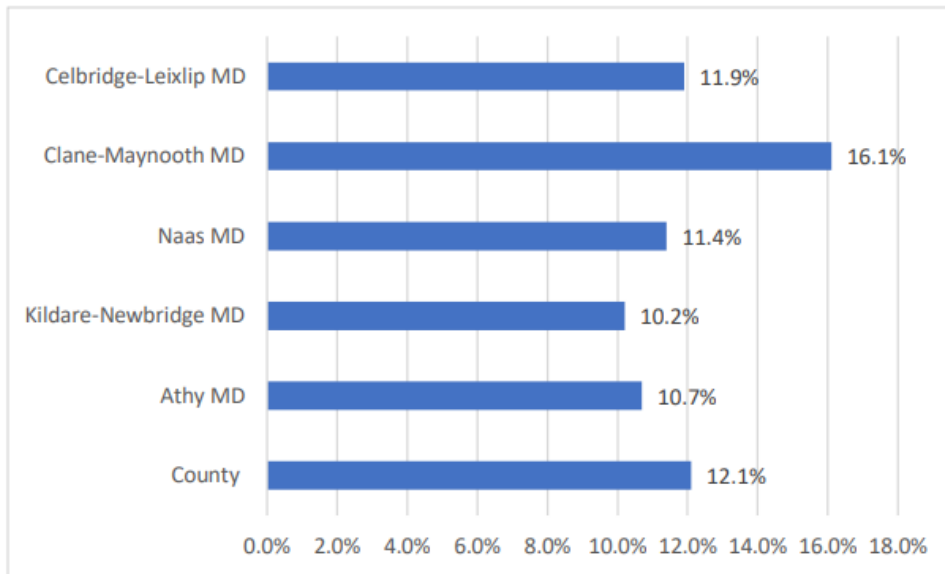


Figure 7. Number of Students as a Percentage of Total Population 15years and over, 2016

Outlined in the draft Plan, *“taking a deeper look at the Clane-Maynooth MD, and referring to the Figure below, shows that 25.3% of the population of Maynooth town over the age of 15 are students, compared to an average of c. 11% for the other towns within the vicinity, including Leixlip and Kilcock which are connected to Maynooth via a rail line.”*

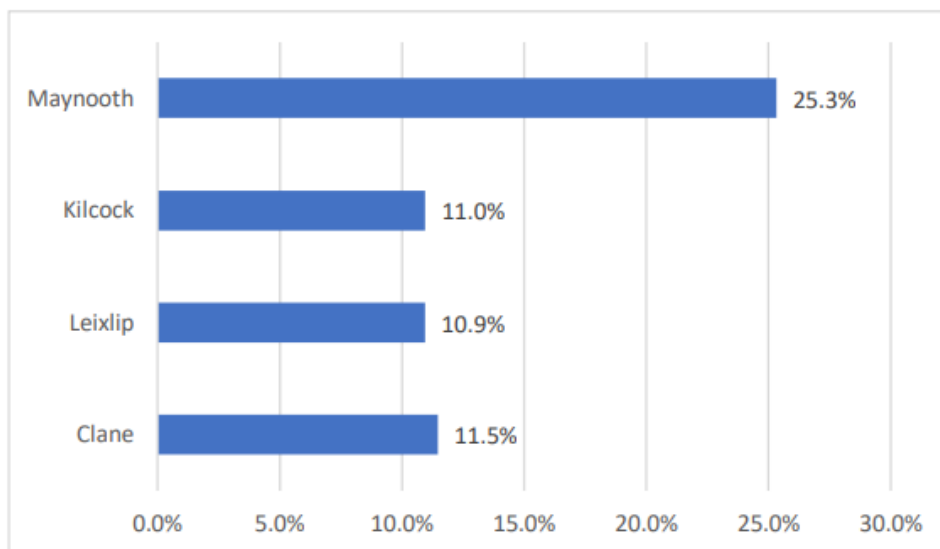


Figure 8. Number of Students as a Percentage of Total Population 15years and over, 2016

As per the draft Development Plan, “*Maynooth University is the only third level institution in County Kildare. The university has a total enrolment of 13,700 students comprising around 11,450 undergraduates and 2,240 postgraduate level students. Maynooth University received its highest-ever number of applications for admission in September 2021. Almost 17,000 applicants applied to the University, according to figures released by the Central Applications Office (CAO), an increase of 12% year on year. In a press release dated 14th July 2021, the University states that it plans to admit more than 3,500 students in the 2021/2022 academic year. Represented in the Figure below, this figure follows the trend of new entrants to the university over the last number of years.*”

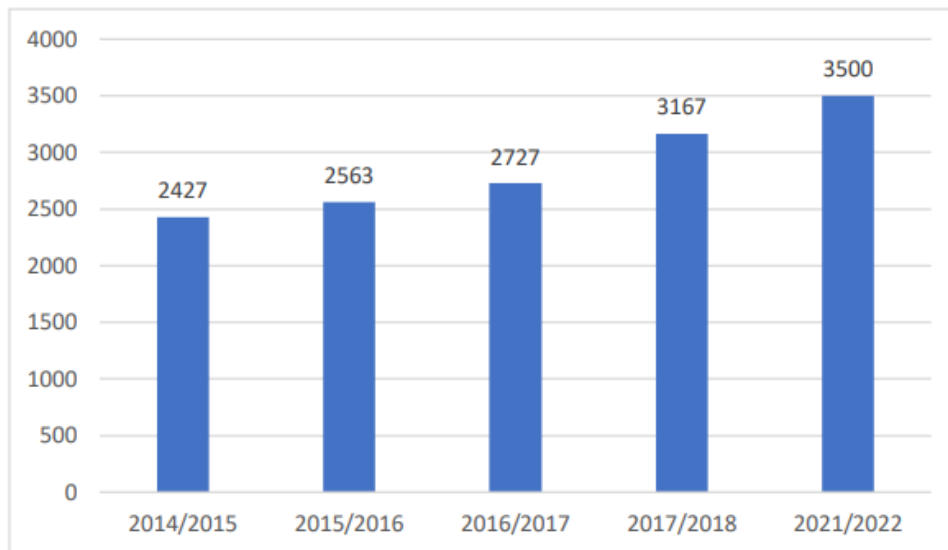


Figure 9. New Entrants to Maynooth University (source: draft Development Plan)

In addition, the draft County Development Plan states that “*on foot of planning permission Ref. 18922, construction of a two- to four-storey academic building of c. 10,554 sqm gross floor area, commenced in August 2019, and includes new teaching spaces. The planning application documentation reported that it is envisaged that the student numbers at the university would increase to 14,500 by 2022. As a result, demand for student housing can be expected to increase accordingly in Maynooth and perhaps in the adjacent towns of Kilcock and Leixlip, up to and beyond these years.*”

With respect to the above, an emerging need for co-living accommodation in Maynooth and adjacent towns is anticipated. Therefore, aligning the housing supply with the dynamics of the existing and future housing demand in Maynooth in tandem with transportation and in particular railway line is suggested to allow for a more efficient use of land facilitating smart growth of the town.

## 5.4 Sample Site -Doctors Lane

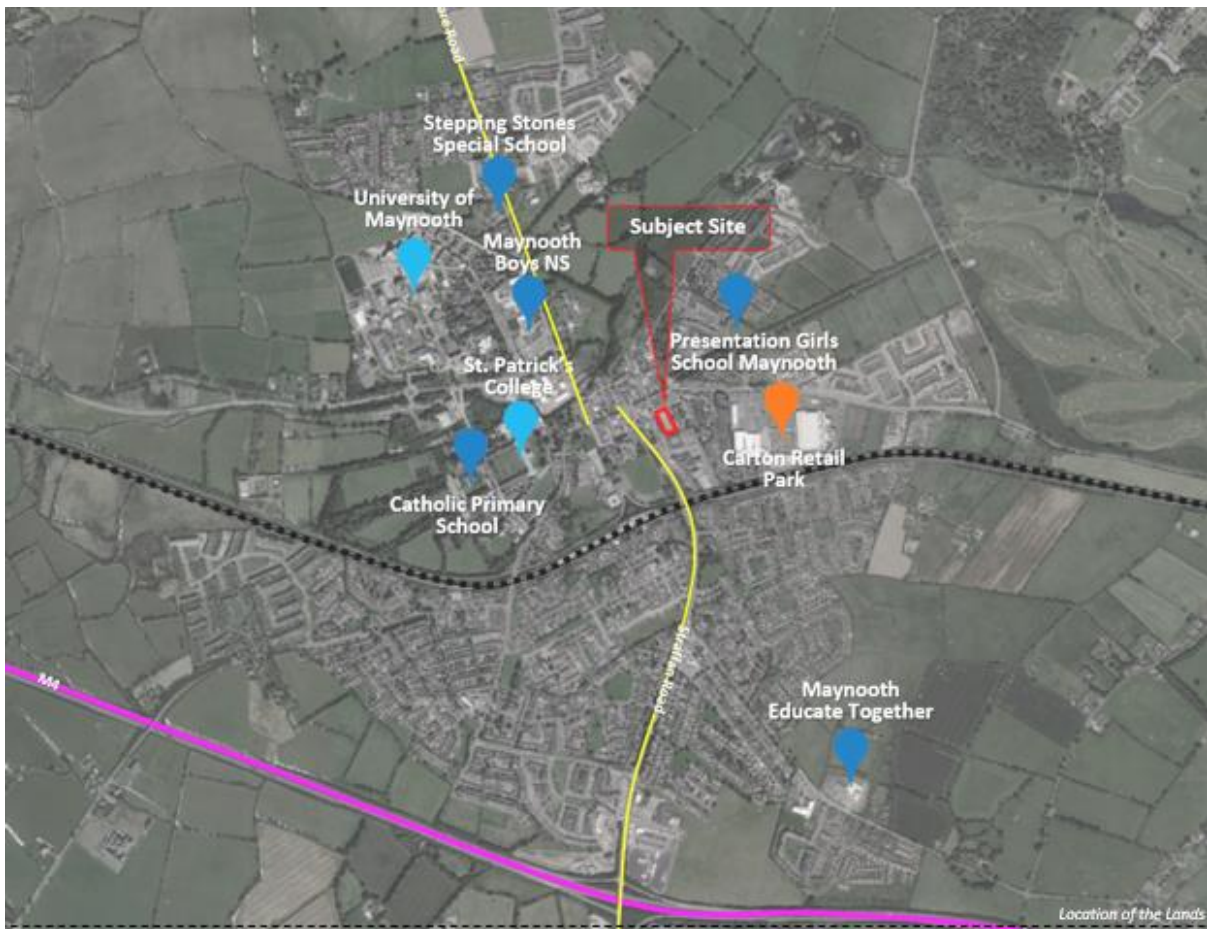


Figure 10. Location of the Sample Site

For the purpose of this submission, the site outlined above at Doctors Lane is used as an example of where co-living accommodation could be accommodated in Maynooth Town. The subject site is a browfield, infill site and is zoned Town Centre within the Maynooth Local Area Plan. Residential Development is permitted in principle.

The site is within a 10-minute walk and 5 minute cycle of Maynooth University. The site is bounded by a mix of residential and commercial uses with vehicular access to the north via Doctors Lane. The site rectangular in shape and appears to be in use as a car-park.

Demesne Architects have compiled an indicative layout to show how co-living accommodation could work on this site. The indicative scheme outlines how c.40 residential units can be accommodated along with the provision of high quality and central external open spaces which are linked to a range of indoor communal facilities for the end users. In addition to this, provision for car-parking can also be accommodated.

The indicative layout shows how the proposed co-living development can be orientated to maximise daylight and sunlight while ensuring no loss of residential amenity to adjoining properties.





*Figure 11. Location of the Sample Site*

Given the location and zoning of the site, in proximity to educational and employment sectors within the Town Centre, this site would provide an ideal example where co-living could be accommodated. By providing co-living on this brownfield site, more suitable site are made available for the residential needs of other cohorts of the population.

## 6.0 CONCLUSION

Co-living is a choice of tenure, suited to the needs of specific individuals and their lifestyles. It is identified as a distinct format within the overall residential sector, which, due to its specific nature, has a limited, 'niche' role to play in the provision of the new residential accommodation within Ireland. The co-living format comprises professionally managed rental accommodation, where individual rooms are rented within a commercial development that includes access to shared or communal facilities and amenities.

Downey Planning maintain that Kildare County Council have not evidenced that there is no need for co-living development in the HDNA, as required by the 2020 Apartment Guidelines. There remains a clear demand for co-living units to support a broad and balanced housing market. Kildare County Council's HNDAs should be updated to properly assess co-living units and the contribution they could make towards meeting housing need over the plan period, as part of next stage modifications to the draft plan.

The demand for rental accommodation across Ireland continues to increase exponentially, particularly in its urban centres, as such co-living developments have the potential to create high-quality homes which are affordable and encourage social integration. While it remains essential to meet the housing needs of all sectors of society, it is also important to address various stages of the lifecycle. In this regard, co-living developments could meet the demand for single occupancy.

As outlined above, there is a need for a mix of tenures within our built-up areas, including a need for purpose-built accommodation for the long-term rental market. This accommodation can assist in providing a more responsive private rental market in line with current housing need and national policies and objectives.

The National Planning Framework states that: *“the long-term vision for Ireland’s housing future aims to balance the provision of good quality housing that meets the needs of a diverse population, in a way that makes our cities, towns, villages and rural areas good places to live now and in the future.”*

The finding of the HNDA and the policy wording is concerning. One-bedroom units in the private sector and co-living units provide very different lifestyles and have very different costs associated with them. Factors such as the rental cost of a one-bed apartment plus utilities may be a factor in the slight reduction in demand for need versus a two-bedroom apartment where utility costs can be shared. This should be a consideration when assessing the need for co-living in County Kildare and particular Maynooth.

Considering the above, Downey Planning would respectfully request that Kildare County Council consider the concerns outlined in this submission with respect to the wording of policies pertaining to co-living and consider re-assessing them accordingly.