

Chapter 3: Housing

3.2 Strategy

We note the following in this chapter's strategy:

Engaging in active land management to promote regeneration including utilising the Vacant Sites Register and other future vehicles, including the Zoned Land Tax.

3.3. Policy Context

The following should be inserted to the list of policies governing this chapter:

- Sustainable Rural Housing Guidelines (2005)
- Derelict Sites Act, 1990 (as amended by the Planning and Development Act, 2000)
- Urban Regeneration and Housing Act 2015

3.9 Regeneration, Compact Growth and Densification

HO O13 - seeks to: *Support and promote the renovation and re-use of obsolete, vacant and derelict homes* through a number of means.

However, we note that no actions are listed under this section. There are currently six properties in County Kildare on the **Vacant Sites Register**. If this register was actively managed and the vacant site fee collected, these funds could be put to great use if invested in the communities affected.

Additionally, this would greatly encourage owners to develop these sites and revitalise town centres. There are many derelict sites in all of our towns in Kildare. This is an area where the council can exert great control. We recommend insertion of the following actions:

Additional Action 1: *Develop a staged plan to populated and actively manage the Vacant Sites Register (VSR) over the lifetime of this plan.*

Additional Action 2: *Actively enforce the Urban Regeneration and Housing Act 2015 using the VSR.*

Additional Action 3: *Actively enforce the Derelict Sites Act, 1990 (as amended by the Planning and Development Act, 2000) using the VSR.*

3.11.1 Older People

We commend the Council on all objectives **HO O21 - HO O26**

We feel that a similar actionable commitment as **HO O42** should be made to integrate the **Property Interest Register** and **Land Development Agency (LDA) maps**, and to work in partnership with the LDA to identify state owned sites in urban centres to provide **housing for older people, within walking distance of shops and services and public transport** along the lines of McAuley Place, Naas.

Additionally, there are approximately 64,000 people living with dementia in Ireland and the number of people with the condition is expected to more than double in the next 25 years to over 150,000 by 2045. (<https://alzheimer.ie/creating-change/awareness-raising/dementia-in-the-media/>). We would advocate for best practice in planning for older people in general

and for those living with dementia. For example:
https://www.rtpi.org.uk/practice/2020/september/dementia-and-town-planning/#_Toc53477595

Furthermore, the pace of digitalization is uneven. Insufficient investment in digital training for older people means that they are being left behind in this digital revolution. This is leading to difficulties, for example, in banking access and access to other services; or even in the ability to be able to contribute to the development planning process. We would like to see a firm commitment by KCC to respond to this.

HO 042 (*Support and, where feasible, work in partnership with the Land Development Agency (LDA) in the provision of social and affordable housing in County Kildare*)

Insert new objective, as follows:

Additional Objective: *Integrate the Property Interest Register and, where feasible, work in partnership with the Land Development Agency (LDA) to target sites within walking distance of shops and services and public transport for the provision of **housing for older people** in County Kildare.*

Additional Objective: *That KCC will configure and integrate planning for Dementia/Alzheimer friendly environments into their plans.*

3.13. Sustainable Rural Housing

We particularly welcome many of the objectives in this chapter relating to Rural Housing. We submit the following:

HO 050 - *Require that all applications demonstrate the ability to provide safe vehicular access to the site where the necessity to remove extensive stretches of native hedgerow and trees or can demonstrate existing hedgerow is not native and provide a landscape design to reinstate a hedgerow to outline proposals for replacement of same or comparative. Note; The need for the removal of extensive roadside hedgerow may indicate that the site is unsuitable for development.*

- **HO 050 does not seem to be** grammatically correct and does not provide a clear meaning.
- We strongly suggest that any requirement to reinstate a hedgerow should in all cases stipulate that only native species of trees or shrubs of native origin and provenance be used:
 - To protect the genetic integrity of our native island species (a component of the IUNC definition of biodiversity – see our comments on chapter 12), and to provide clear guidelines to planners and the general public (especially with regards to Technical consideration 4 “Planting for biodiversity”)
 - To reduce the risk of importation of pests and diseases, particularly microorganisms.
 - See O’Hanlon et. al. 2021 Catalogue of Pests and Pathogens of Trees on the Island of Ireland. Biology and Environment: Proceedings of the Royal Irish Academy

- *“In the last decade however, the greatest risk to trees and forests on the island of Ireland is the introduction of non-native pests and pathogens.”*
- To support local nursery stock businesses, see:
 - See **RE P13** (Chapter 4) Support and facilitate sustainable agriculture, horticulture, forestry, and other rural enterprises at suitable locations in the County.
- Implement the guidance of the **Draft Kildare County Development Plan 2023-2029 - SEA Environmental Report**:
 - <https://consult.kildarecoco.ie/en/system/files/materials/4060/Draft%20Kildare%20CDP-%20SEA%20Environmental%20Report%20Final%20Issue.pdf>
 - “Require that proposals retain and maintain existing hedgerows in all instances, with the exception only of the section required to be removed to provide visibility at the proposed site entrance. On such cases, proposals for replacement hedgerows, including details of composition and planting must be submitted with any application which requires such removal.”

Similarly, **HO P29** should state native hedgerow species of native provenance and origin.

3.17 Flood Risk Management

We refer to:

Applicants will be required to comply with the requirements of The Planning System and Flood Risk Management Guidelines for Planning Authorities, DEHLG (2009) where appropriate and applicable.

- Do these requirements reflect current pluvial flooding forecasts for Kildare along a 1.5 °C trajectory? If not, how can they be improved?

Additional Comments

- Taking account of the targets regarding student accommodation and rental properties, how does KCC plan to manage and incentivise domestic energy efficient measures to be taken in non-owner-occupied properties?
- Additionally, we note that the draft Development Plan makes no reference to **Community-led Housing (CLH)**.
 - Community-Led Housing is evolving across Europe and the wider world, empowering communities to develop solutions which address their particular housing needs. CLH is an umbrella term, encompassing a wide range of approaches, including cooperative housing, cohousing, Community Land Trusts (CLTs), and self-help housing.
 - This approach provides a framework of collaboration in the creation and revitalisation of new and existing neighbourhoods. The unique feature of CLH is the empowerment of future residents to meaningfully participate in both the design and long-term management of their homes.
 - Although no two CLH projects are the same, they all share a common goal of meeting specific local housing needs via collaboration, empowerment, and

mutual support. The idea is premised on the conviction that a house is not just a building, or an asset, it is a home: a place to live. See:

- <http://www.housingagency.ie/sites/default/files/2021-04/CLH-Launch-Flyer.pdf>
- The Self Organised Architecture (SOA) organisation have released some very important publications on this topic which contributed to the formulation of the Affordable Housing Act 2021. This sees CLHs and CLTs referenced in Irish legislation for the first time. See:
 - <https://soa.ie/>

With this recent addition to the Affordable Housing Act, KCC can take the lead in implementing community-led solutions that can positively alleviate the housing crisis across this county. This contributes to efforts to achieve SDG 1, 3, 10, 11 and 17.