

Gavin Lawlor



Planning Department  
Kildare County Council  
Devoy Park  
Naas  
Co. Kildare

Monday, 23<sup>rd</sup> May 2022  
[Via Consultation Portal]

Dear Sir/Madam,

**RE: SUBMISSION TO DRAFT KILDARE COUNTY DEVELOPMENT PLAN 2023-2029.**

I am a Town Planner with almost 30 years' experience and a director with the firm Tom Phillips and Associates, Planning Consultants. I wish to make a submission in relation to the Draft County Development Plan in private capacity. In particular, I wish to raise concern with some of the policies and provisions of Chapter 3 Housing.

My submission concerns two aspects of Chapter 3, namely a potential miscalculation as to the amount of lands needed to facilitate future housing demands (HNDA) and the Council's planned new policy in terms of Rural Housing Density.

#### **HOUSING NEED DEMAND ASSESSMENT**

The Draft plan sets out the core policy in relation to the quantum of zoned lands in Section 3.6 Housing supply at Policy HO P4. Policy HO P4 states the following:

*'It is the policy of the Council to: Ensure that sufficient zoned land continues to be available at appropriate locations to fulfil the housing requirements of the county.'*

Equally Objective HO 02 states the following:

*'Ensure that sufficient land is zoned at appropriate locations in compliance with the Core Strategy and Settlement Strategy of the Development Plan, in order to meet the likely future housing demands identified in the Housing Strategy and HNDA.'*

These are key policies and objectives which clearly states that the Council will ensure that sufficient land is available to meet the housing demand. This mandates that the 'housing requirements' determined by the HNDA should be treated as a minimum requirement for the zoning of lands and not a maximum.

It is an obvious fact that if you only zone sufficient land to meet your expected housing demand, you will not meet that demand. This is due to obvious delays in securing planning permission and then finance to build as well as other supply side shocks like Covid or the Ukrainian war.

Research completed by Tom Phillips and Associates (TPA) in 2021 has shown that c.40-60% of greenfield zoned lands are not brought forward for development between Development Plan periods (i.e., no planning applications are lodged on up to 60% of lands zoned for residential development).

In terms of planning permissions which have been granted, research by TPA has again shown that a maximum average of 50% of permissions granted have been developed over each development plan period (ie over a 6 year period). These statistics are reasonably constant over the past 20 years.

In this regard, over the life of a development plan approximately 30% of the lands zoned for residential development can be expected to deliver built houses within the life of the Plan. As such, zoning only for what you need (without any headroom), guarantees you will not reach your target.

The core Strategy as set out in Chapter 2 calculates that the Housing completion target for the end of the plan period is 9,144 units. To be clear that is 9,144 homes built within the development plan period. This assumes that an average of 1,524 units per annum can be completed for every year of the plan. It should be noted that housing delivery is never linear. During peak years more houses are delivered than the average required due to high demand and then in recessionary times very few houses are delivered.

### ***Requested Amendment***

In line with Policy HO P4, the 9,144 unit target derived for this Draft Development Plan should be treated as the minimum target for completed housing for the County and not a maximum target limiting the quantum of zoned lands. This should be specifically recognised in the development plan to ensure that the quantum of zoned lands is not limited going forward.

Equally, the quantum of zoned lands as set out in the settlements in Volume 2 should be re-assessed having regard to the need to ensure that the minimum quantum of housing which has been determined to be needed in each of these settlements is delivered within the life of the plan.

### **RURAL HOUSING DENSITY**

The council's policy on rural housing density as set out in Section 3.14 is fundamentally flawed. The policy will in fact have the opposite effect to what is intended.

The intent of the Council as expressed is to 'to manage rural housing to avoid a proliferation of one-off houses, extensive ribbon development, piecemeal and haphazard development that erode the intrinsic character of the Irish countryside.' As such to limit further proliferation means that rural housing should be kept away from areas which currently have limited rural housing densities.

If as indicated in Section 3.14 rural housing is limited to a density of 25 units per square kilometre, then applicants who have a genuine rural housing need will be forced to develop rural houses in areas with lower rural densities. Over time, areas with limited rural housing will densify resulting in an overall higher rural density in all rural areas (i.e. a proliferation of rural housing). Equally, given the fact that rural housing is less sustainable when it is spread out more, focusing new rural houses in less densely populated rural areas will also serve to be less sustainable.

The issue of Rural Housing has been adequately dealt with in the current Development Plan and there is no need for further controls and limitations. National Policy mandates that Council's make specific provision for rural generated rural housing, yet the Draft Plan is seeking to place unnecessary further controls on such housing. It appears as if the Council is anti rural housing and is seeking to make it almost impossible for persons with a genuine rural housing need to secure permission for a new home in a rural area.

### ***Requested Amendment***

I would request that the entirety of Section 3.14 is deleted from the plan and that if further controls are needed on rural housing over and above the Policies already in place then rural housing should in fact be directed to areas which already have high rural densities and clusters of rural housing.

### **CONCLUSION**

I trust that the Council will have due regard to my submission.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Gavin Lawlor', with a period at the end.

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Gavin Lawlor (B.Soc. Sci., MRUP, MIPI)