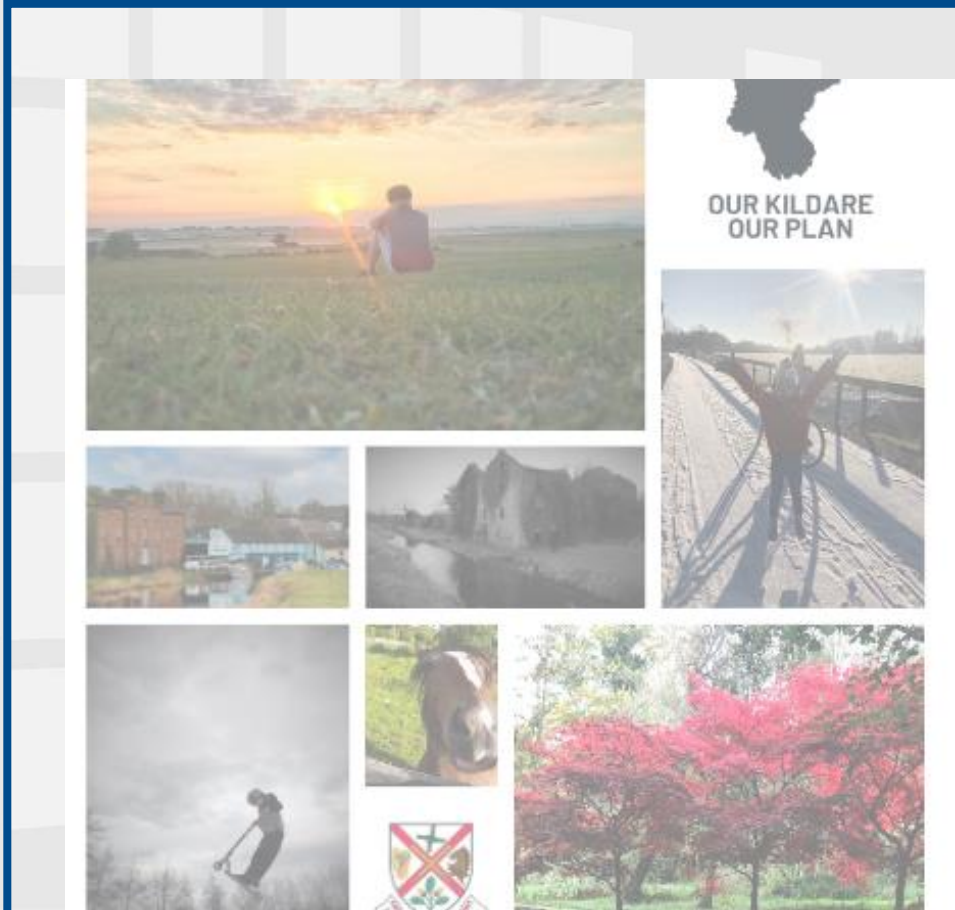


Submission

To Draft Kildare County Development Plan 2022
on behalf of O'Flynn Construction Ltd.

May 2022



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1. Introduction & Summary

This submission to the draft Kildare County Development Plan 2022 (draft KCDP) is made on behalf of O'Flynn Construction Limited (OFC).

OFC are active housing developers in Celbridge and form part of an established development company who focus on bringing forward residential development in the immediate term. They have been responsible for delivering an extensive number of homes across the country including in the Dublin metropolitan area. They obtained consent for a strategic housing application in Oldtown, Celbridge (ABP-303295-18) for 251 residential units. This development is now nearing completion and has provided considerable infrastructural benefits to the Oldtown environs, consisting of:

- Improvements to Shackleton Road, providing enhanced pedestrian, cycling and bus stop facilities.
- Improvements to the junction of Shackleton and Oldtown Road, improving traffic flow.
- Improvements to the surface water treatment in the local catchment.
- Improvements in the capacity of the foul water capacity in the local catchment.

The Oldtown development is providing desirable homes in an area with a strong need for new housing. OFC's commitment to delivering sustainable high-quality housing, in an area well connected to residential amenities and services demonstrates the importance of considering the following key issues in terms of land zoning policies:

- **Accessibility:** ensuring that zoned lands are well connected to urban centres and existing residential services and amenities.
- **Consolidation:** ensuring that zoned lands consolidate existing and permitted development within urban areas.
- **Deliverability:** ensuring that zoned lands are deliverable in terms of the availability of infrastructure services and the likelihood of landowners bringing land forward for development during the lifetime of a Development Plan.

Equally important in the context of land zoning policies is ensuring that there is flexibility within the land supply system, in recognition that not all sites are likely to come forward within the Development Plan period, and there is a need to respond quickly to changing economic and demographic pressures. Appendix 2 of this submission provides an appraisal of existing zoned lands in Celbridge. The case study demonstrates the need to ensure that deliverability is a key consideration in zoning lands if the shortage of housing supply is to be addressed.

The population and housing growth targets outlined in the draft KCDP are significantly lower than the previous plan when adopted in 2016. The impact on the estimate of zoned land required is considerable, with a 75% reduction

for the required estimate in 2016 to that detailed in the draft KCDP in 2022. The impact on the land supply market of this reduction will be significant and is likely to result in sharp increases in the cost of residential zoned land. This, coupled with increased construction costs will further undermine the viability of housing development and the ability to respond to the current lack of housing supply.

This submission outlines several concerns related to the calculation of housing need and the estimate of residential zoned land requirement. The submission also includes a detailed analysis of the availability of lands currently zoned in Celbridge. The case-study analysis indicates the challenges in bringing zoned residential land forward for development and emphasises the need for additional headroom in zoning calculations. This can be achieved in a balanced manner, without undermining the objectives 3b and 3c of the National Planning Framework, which relate to compact growth.

It is submitted that:

- The draft HNSA has under-estimated housing demand and that the true dwelling requirement for Kildare County during the lifetime of the Development Plan is a minimum of **17,607**.
- Any allocation of dwelling targets to infill / brownfield lands should be evidenced by a settlement-based assessment of the availability and viability of such lands to delivery during the lifetime of the Development Plan.
- The KCDP should provide sufficient headroom in zoned land to ensure that no shortage of land occurs during the lifetime of the development Plan.
- The KCDP should introduce a 'Tier 3' or 'Longer Term Strategic' residential zoning to identify lands suitable for residential development in the medium to longer term. This will help to alleviate upward pressure on land prices by avoid a significant 'shock' to the land supply market associated with extensive de-zoning of lands. It will also ensure that there an identified bank of appropriate development lands, should growth rates prove to be stronger than project, or zoned lands are not released for development.
- In zoning lands priority should be given to lands based on their Accessibility, Consolidation and Deliverability.
- The KCDP should include a review of land zoning in the main settlements as part of the review process and not delay until the production of Local Area Plans.
- OFC's remaining landholding at Oldtown, Celbridge should be included as Tier 1 zoned lands to be delivered in the lifetime of the forthcoming development plan.

2. Core Strategy

2.1 Overview

Summary

- Projected annual population growth between the 2016 KCDP and draft KCDP periods is similar, but there has been a significant reduction in the annual dwelling targets in the draft KCDP.
- There is a 75% reduction in identified zoned land requirement between the two Development Plan periods.
- The HNDA is being used as a tool to implement national spatial strategy. It is therefore not accurately reflecting demand likely to arise in a local authority, rather it is setting an artificial limit on the supply of land on the assumption that unmet demand will relocate to a local authority area with a higher growth target.
- A constrained land supply will result in further increases in land and house prices, undermining the economic viability of the region. The impact will be felt by households unable to afford housing and by employers unable to attract workers.

Rationale

This section of the submission considers the dwelling targets and identified zoned land requirements in the draft KCDP.

Table 2.8 of the draft KCDP sets out the settlement hierarchy and Core Strategy population and housing unit targets to 2028.

A comparison between the targets set when the previous KCDP was adopted in 2016 is provided in Table 1. Italic figures in brackets provided annualised figures (2016-2023 timeline accounts for 7 years, while 2023 to 2028 accounts for 6 years).

Analysis of the population growth and dwelling targets between the 2016-2023 (extant KCDP) and 2023-2028 (draft KCDP) indicates the projected annual population growth between the two periods is similar, with a slightly lower annual growth projected at County level in the draft KCDP period. Overall, in the main settlements it is projected that there will be a slightly lower annual population growth in the draft KCDP period.

In most settlements within the County, it is projected that there will be a decrease in the rate of annual population growth. However, in Celbridge the annual projection for the draft KCDP period is approximately 30% higher than was projected in the extant KCDP.

Settlement	Population Growth		Dwelling Target		Zoned Land (ha)	
	16-23	23-28	16-23	23-28	16-23 ¹	23-28
Naas	6,238 (891)	3,747 (625)	4,842 (692)	1,362 (227)	166	40
Maynooth	5,785 (826)	2,741 (457)	3,542 (506)	997 (166)	70	Tba (estimate 30ha)
Newbridge	4,128 (590)	2,917 (486)	3,770 (539)	1,061 (177)	108	35
Leixlip	3,477 (497)	2,565 (428)	3,315 (474)	933 (156)	63	31
Celbridge	2,170 (310)	2,515 (419)	3,250 (464)	914 (152)	83	30
Athy	2,670 (381)	1,207 (201)	1,560 (223)	439 (73)	105	15
Kildare	2,152 (307)	1,182 (197)	1,527 (218)	430 (72)	134	14
Kilcock	1,921 (274)	1,006 (168)	1,300 (186)	366 (61)	57	12
Monasterevin	1,607 (230)	654 (109)	845 (121)	238 (40)	26	8
Clane	591 (84)	604 (101)	780 (111)	219 (37)	45	7
Sub-Total Towns	30,739 (4,391)	19,138 (3,190)	24,731 (3,533)	6,959 (1,160)	857	222
Rest of County	683 (98)	6,008 (1,001)	7,766 (1,109)	2,185 (364)		
County Total	31,422 (4,489)	25,146 ² (4,191)	32,497 (4,642)	9,144 (1,524)		

Table 1: Comparison of Development Plan Growth, Targets & Zoned land

While the change in the annual projected population growth between the two Development Plan periods are relatively minor, there is a considerable reduction in the projected dwelling requirement. The assumptions used in the 2017 KCDP are not clearly detailed, however, it is noted that the dwelling targets were calculated having regard to:

- Household formation rates, and
- Vacancy rates.

¹ As detailed in Development Plan – does not account for any revisions to zoning in subsequent LAP reviews which provided additional lands.

² Population growth target from baseline of 2021, while dwelling target figure takes account of units constructed up to 2022.

There is also a considerable reduction in the estimate of zoned land requirements between the two Development Plan periods. During the extant KCDP it was estimated that there was a zoned land requirement of 857 ha in Kildare County's main towns. During the adoption of Local Area Plans additional lands were zoned, so in practice additional lands were made available. In the draft KCDP it is anticipated that there is a required for 222 ha of land in the main county towns (a reduction of 75% on the earlier Development Plan period). The main driver of this reduction is the projected dwelling target, although there is also a marginal change in the density assumptions for zoned land between the two periods.

Appendix 1 of the draft KCDP provides a very detailed assessment of the demographics and housing demand metrics, in line with the '*Guidance on the Preparation of a Housing Need and Demand Assessment.*' (HNDA). However, rigid compliance with the HNDA will result in a lack of residential land supply during the lifetime of the KCDP.

The HNDA is being used as a tool to implement national spatial strategy. It is therefore not accurately reflecting demand likely to arise in a local authority, rather it is setting an artificial limit on the supply of land on the assumption that unmet demand will relocate to a local authority area with a higher growth target. This is a fundamentally flawed premise. Housing demand is generated by employment and education opportunities and by social connections to an existing area. National spatial strategy objectives should be driven by incentives for delivering housing, employment, and education growth in key areas, not in constraining residential land supply in areas of existing pressure. A constrained land supply will result in further increases in house prices undermining the economic viability of regions. The impact will be felt by households unable to afford housing and by employers unable to attract workers.

Core Strategies and Development Plans are by their very nature 'behind the curve' in terms of estimating population and household growth and housing demand. Population estimates and policies are based on review of trends and assumptions on future growth but can never fully predict future patterns of migration or demand. No planning policy estimates predicted international level shocks, such as the Covid-19 pandemic, or the Ukrainian war (with sudden increase in migration of refugees).

As active house builders in County Kildare, OFC are seeing the impacts of hybrid and homeworking, with more people seeking to live outside of Dublin and commute on an occasional basis. This is increasing housing demand in key settlements within the wider Dublin metropolitan area and beyond.

Planning policy debate increasingly refers to building in resilience to our systems, to ensure that communities can respond effectively to issues of climate change, and other impacts over which we have limited influence.

A plan led approach relies on consistency at a national level, with objectives from the National Planning Framework feeding into Regional Spatial and Economic Strategies and then a two-year review process to adopt Core Strategies within development plans. By the very nature of a plan led

approach, by the time they are adopted, Core Strategies are out of date as they:

- Are based on previous Census data. Due to Covid-19 the current census data on which population projections are based is now 6 years old.
- Assess past trends rather than emerging market demands. Analysis of housing need is primarily based on a review of statistics associated with fertility rates, migration rates, headship rates, vacancy rates, construction output, and social housing waiting lists. However, there is limited qualitative based analysis built into the assessment process to understand emerging demands, for example: population aspirations in terms of household formation, locational preferences, tenure / housing preferences; or to understand market influences such as emerging employment investment decisions at a national and international level.

Evidence on the ground of housing demand and constraints in supply indicates that population growth in Kildare County is much stronger than projected by the NPF Roadmap, as discussed in section 2.2.

2.2 Population Growth Estimates

Summary

- Actual growth is outstripping projections and likely to be more in line with CSO Regional Population Projections 2017 – 3031.
- National population growth is higher than CSO Regional Population Projections predicted. Therefore, impact at regional level may be higher again.
- When the Regional Population projections are applied to Kildare County to 2031, almost every scenario projects a higher population than that projected by the NPF Roadmap.
- It is likely that the NPF Roadmap has underestimated the 2031 population for Kildare County by at least 20,680 people.

Rationale

The Core Strategy is based on the Transitional Regional and County population projections to 2031 for Kildare as provided in the NPF Roadmap and the RSES, as detailed in table 2.2 of the draft KCDP.

County	2016	2026	2031
Kildare	222,500	249,000 – 254,000	259,000 – 266,500

Table 2: NPF Population Targets for Kildare County to 2031

However, these population projections are based on the NPF targets for a revised spatial distribution of population growth and are therefore policy

rather than demand based. Evidence suggests that growth in the mid-east region is stronger than projected, resulting in a severe shortage in housing supply. OFC can attest to exceptionally strong demand for housing in Celbridge, with all houses released currently sold.

It is evident at a practical level that the population projections detailed in the NPF Roadmap for the Mid-East Region and Kildare County are being surpassed, resulting in a deepening of the housing crisis due to a lack of supply.

The CSO Regional Population Projections 2017 – 2036 outlined a range of growth scenarios between 2016 to 2036 (see Table A1 – Appendix 1). These projections were not based on a policy objective, but on trends and varied assumptions in terms of migration, migration flows and fertility.

The projections assumed the highest level of State growth to be 5,812,500 by 2036, and the lowest level of State growth to be 5,330,600 by 2036. Extrapolating this growth back to 2021 it would suggest a State population ranging from between 4,887,000 to 5,008,000. The latest CSO population estimate the State's population in April 2021 to have been 5,011,500³, indicating that the CSO regional growth scenarios outlined in Table A1 – Appendix 1 are likely to have been under-estimated.

When the Regional Population projects are applied to Kildare County to 2031, almost every scenario projects a higher population than that projected by the NPF Roadmap. Given that the Regional Population projections were lower than actual growth, it is again likely that the growth at the level of Kildare County is higher again. These projections are borne out by the evidence of lack of affordability in the housing market, and reports from industry experts on lack of housing supply.

At a national level, the NPF roadmap projections at the higher level do appear to account for the actual growth, although the results of the 2022 Census will be required to confirm this. The inconsistency arises in respect of how this growth has been distributed throughout the country.

Planning policy and the NPF Roadmap is aiming to direct growth to the five main cities and metropolitan areas outside the Dublin and Mid-East region. However, it is clear from evidence at county level that stronger growth than provided for by the NPF Roadmap has been experienced in these areas. It is probable that the population in Kildare County at 2031 will, at a minimum, be closer to 280,000 to 290,000 as opposed to the 259,000 – 266,500 population projected by the NPF Roadmap.

This additional population pressure, coupled with the HNDA approach to calculation household size and vacancy rates (discussed in section 2.3 and 2.4), is resulting in a considerable under-estimate of the housing need for the period Development Plan period.

³ Population and Migration Estimates, April 2021, CSO – published in August 2021

The draft Kildare County Development Plan has taken the higher population figure in the NPF Roadmap for its calculations of housing need, and this is welcomed. However, practical experience in Kildare attests to actual growth being much higher.

If the CSO mid-projections for the Dublin outflow scenario are assumed the population in Kildare County in 2031 would be 287,180⁴. This would mean that the NPF Roadmap has under-estimated population growth in the county by at least 20,680. Indeed the figure may be higher given the strong national population growth rates, impact of hybrid / homeworking and higher migration pressures.

2.3 Household Size and Headship Rates

Summary

- Lack of housing supply has had a negative impact on people's ability to form their own households – resulting in higher average household size rates and lower headship rates in younger population groups than the national average.
- HNDA household size assumptions are cementing previous housing supply constraints into land use policy.
- The young demographic age profile of the county is a predictor of increased pressure for new households in the short to medium term.
- The HNDA should be revised to assume household size rates in Kildare County align with projected state averages by 2040.

Rationale

The HNDA takes the starting household size for Kildare as 3.0 in 2016, projecting it to fall to 2.77 by 2031. This assumption fails to take account of the fact that the trend in falling household size up to 2011 was reversed by 2016 due to a lack of supply.

National and Kildare County household size rates had been falling consistently during inter-censal periods until 2016. In 2011 the household size in Kildare County was 2.95 and in the State was 2.73. by 2016 these had risen to 3.0 and 2.75 respectively. Appendix 1 of the draft KCDP (HNDA) estimates that 2017 and 2018 saw further rising in household size, before the beginning of a slight reduction.

Table 15 of Appendix 1 projects that the household size in Kildare will only fall to 2.77 by 2031. This is still higher than the state average household size of 2.75 in 2016. There is limited qualitative analysis of why the Kildare

⁴ See Table A2 – Appendix 1

household size is above average. In reality the higher household size is likely to be an indication of an unaffordable and constrained housing market, forcing delays in people forming their own households. By looking at past trends in household size the HNDA is cementing previous housing supply constraints into land use policy.

Table 1 of Appendix 1 provides a comparison of the breakdown of different age categories between Kildare and the state. Kildare has a slightly higher percentage of people within the young age categories:

- 0-14 (24.1% for Kildare compared with 21.1% for the state)
- 15-24 (12.6% for Kildare compared with 12.1% for the state)
- 25-44 (30.3% for Kildare compared with 29.5% for the state)
- [Combined 0-44] (67% for Kildare compared with 62.7 for the state)

While this is indicative of a higher proportion of younger families, it is also a predictor of increased pressure for new household formation in the short to medium term. Rather than Kildare having a lower-than-average drop in household size, the demographic profile would suggest that the underlying pressure and demand will be for a higher-than-average drop in household size.

This is also evidenced in Table 8 of Appendix 1, which shows headship rates by age category. In 2011 the headship rate in the 25–29 age category in Kildare was higher than the state average (0.36 for Kildare, compared with 0.30 for the state). By 2016 headship rates in this category had dropped at both state and county level, indicating a reducing in housing supply and affordability. However, the drop in Kildare was greater than the state average (0.27 in Kildare, compared with 0.30 for the state). This would indicate that supply and affordability were more constrained in Kildare than the state average.

One of the conclusions of the draft KCDP HNDA is that:

“...Any housing strategy must ensure that there is a adequate supply of zoned and serviced land to address the supply side as demand appears to be there – the obstacles to be addressed being finding funding for both the developer and the purchaser.”

Notwithstanding this conclusion, the draft KCDP HNDA does consider the root cause of the reversal of trends in household formation, rather it takes the rates as given and carries system failures forward to the next development plan period.

It is submitted that the draft KCDP HNDA should be revised to allow for the household size rate in County Kildare to fall to 2.5 by 2040. Table A4 - Appendix 1 illustrates the impact on projected household numbers in the County.

2.4 Vacancy Rates

Summary

- The HNDA tool does not include for any frictional vacancy rate in the housing stock in its demand calculations.
- Very low vacancy rates are an indication of pressure in the housing market and a lack of flexibility in the housing system.
- At a minimum the HNDA should provide for a frictional vacancy rate of 5.9%.

Rationale

The HNDA Guidance notes that the HNDA Tool accounts for obsolescence in its projections. However, there is no allowance for vacancy rates in the calculation. The Guidance document cautions against use of vacancy rates from the Census data because it states that this is a point in time measurement only and reasons for the vacancy on Census night are collected for a portion of vacant units only.

Notwithstanding the HNDA Guidelines, there is an inherent flaw in the calculation of housing supply needs without a recognition of the fact that all housing systems have a frictional vacancy rate. A dwelling obsolescence rate is usually around 0.5%, while the state average vacancy rate was 12.3% in 2016. The 2016 vacancy rate in County Kildare was among the lowest in the state at 5.9%, and in Celbridge was one of the lowest within the County at 3.4%. These low vacancy rates are an indication of the level of pressure on the housing market and the lack of any flexibility in the system, putting upward pressure on housing costs.

It is submitted that the draft KCDP HNDA should be revised to include a frictional vacancy rate of 5.9% in the estimating the dwelling requirement for Kildare County to 2031. Table xy, provided in Appendix 2 illustrates the impact on projected dwelling requirement in the County.

2.5 Revised Dwelling Target

Summary

- The likely minimum dwelling target for Kildare County during the lifetime of the Development Plan is 17,607, assuming:
 - Revised population growth projections
 - Household formation aligning with national trends by 2040
 - Frictional vacancy rate of 5.9%

Rationale

When the issues related to revised population project, households size rates and vacancy rate are considered, the likely dwelling target for Kildare County Council during the lifetime of the Development Plan period is at a minimum **17,607**, as estimated in Tables 3 and 4.

As discussed in section 2.2, population growth appears to be running higher than the CSO estimated when the Regional Growth scenarios for 2017 to 2036 were prepared. The actual dwelling requirement may therefore be higher again than the **17,607** estimated. Preliminary census data due to be published in June / July will give an indication of national growth rates. However, it may be later in the year before Census data can confirm the regional distribution of this growth.

Given the evidence of a shortage in housing supply and increasing affordability constraints in County Kildare, it is vital that the KCDP provides sufficient capacity to address the actual housing demand to the end of the Plan period.

	Annual Average	Total
(A) Projected new household demand 2017 – 2031 (based on extrapolation of CSO Regional Population Projections. (See tables A1, A2 & A4-Appendix 1)	2,147	32,200
(B) Less Actual new housing supply 2017-2019 (as per Draft KCDP)	1,368	4,104
(C) Plus Homeless Households & Estimated unmet demand as at census 2016 (as per Draft KCDP)	n/a	291
Household Demand 2020-2031 (A-B+C)/12	1,788	28,387
Dwelling Demand (Assuming 5.9% frictional vacancy rate)	1,894	30,062

Table 3: Revised Dwelling Demand Calculation to 2031

1.	Dwelling Demand 2020-2031 (see table xy)	30,062
2.	CSO dwelling completions for 2020. (as per draft KCDP)	-1,661
	Net Dwelling Demand 2020 -2031	28,401
	Annualised dwelling demand (divide by 11 years)	2,582
3.	Dwelling Demand to end of development plan period 2020 – 2028 (multiply by 8 years)	20,655
4.	Housing Completion estimates 2021 and 2022	-3,048
5.	CDP housing target to end of Plan period	17,607

Table 4: Revised CDP Housing Target to end of Plan period

2.6 Compact Growth

Summary

- To facilitate the development of infill and brownfield lands there is a need for active land management policies and tax incentives to support their viability.
- Any allocation of housing growth to infill and brownfield sites should be evidenced based. Such allocation should be determined following a settlement-based assessment of the availability and **viability** of infill / brownfield lands to deliver housing during the lifetime of the Development Plan.
- Compact growth can be achieved by prioritising the zoning of land that consolidates existing development and is accessible to existing residential services and amenities.
- There remains a need for some headroom in quantum of land zoned for residential development, to ensure that there is not a shortage of land supply during the lifetime of the Development Plan.
- The KCDP should introduce a zoning policy for 'Tier 3' or 'Strategic Land Reserve' to avoid further de-stabilising of the housing market and provide flexibility to respond to pressures in the housing market during the lifetime of the Development Plan.

Rationale

The planning policy focus on sustainable compact growth is supported by OFC and the wider construction sector. It is recognised that there is a need for rebalancing of the zoned land supply to focus infrastructure investments appropriately and achieve compact growth objectives.

The development of infill and brownfield lands is a laudable objective. However, development of these lands must be viable to ensure an effective contribution to delivering housing targets. The viability of infill and brownfield sites is often more challenging due to:

- Complicated site assembly
- Smaller land parcels with potentially lower return on investment required to bring schemes forward
- Development constraints associated with an existing urban context
- Costs associated with site clearance or decontamination.

To ensure that housing can be developed on infill and brownfield sites there is a need for active land management by Local Authorities or the Land Development Agency. There is also a need for policies and / or tax incentives to improve the viability of infill and brownfield sites. Constraining the supply of zoned land will not by default encourage development towards infill and

brownfield sites if they are not viable. A planning policy approach which constrains land supply below demand levels, in the absence of active land management initiatives to bring forward infill & brownfield sites, will only have the effect of deepening the housing crisis.

The level of de-zoning that will be required as a consequence of the Core Strategy will have a direct and negative impact on the supply of housing and affordability levels because:

- A constrained land supply market will inevitably result in an increase in the cost of residential land. Increased land prices will either make housing less affordable, or undermine the viability of residential development, with fewer housing coming to the market. The creation of a constrained land supply is happening alongside unprecedented increases in the cost of construction materials. Viability of housing development is marginal in many areas of the country.
- The lack of provision of headroom in zoned land supply means that there is insufficient flexibility when lands do not come forward for development. Without a radical shift in land policies, there will be a proportion of zoned land that is not brought forward for development. Reasons for zoned land not being released include an unwilling landowner whose preference remains to continue using land for its existing use, lack of viability, or expectations of further increases in land prices. The vacant site levy cannot be imposed on lands actively farmed, or where there is a lack of viability, so will not be an effective tool in ensuring all zoned lands are brought forward for development.

We have undertaken an analysis of existing lands zoned Celbridge to assess their deliverability. A copy of this study is attached as Appendix 2 of this submission.

The summary findings of this case study analysis are provided in section 3.

It is evident from the case study that there is a need to prioritise the zoning of lands that are likely to be brought forward for development and that there is a need to provide some headroom allowance in zoning policies. Current planning policy is based on a housing needs assessment that:

- Underestimates actual demand on the ground,
- Requires development targeted to infill and brownfield lands, without any policies to facilitate their viability, and
- Does not provide any headroom on the availability of zoned lands.

The principles of compact growth can be achieved by prioritising the zoning of lands which consolidate existing growth and are accessible to existing residential services and amenities, combined with effective active land management policies to bring forward viable infill and brownfield lands for development.

The development industry is being asked to deliver housing in response to the housing crisis, yet the draft KCDP zoning policies will result in a 75% reduction in the availability of zoned land.

To rebalance the supply of zoned land, without further de-stabilising the housing market, OFC submit that:

- The assessment of the quantum of housing to be delivered on infill and brownfield sites should be evidence based. A blanket percentage allocation of housing to be delivered on infill / brownfield lands should be avoided and any allocation informed by a settlement-based assessment of the availability and viability of such lands during the lifetime of the Development Plan.
- There should be an allowance of some headroom on zoned land supply, in recognition of the fact that the zoning of land cannot guarantee that landowners will bring their land forward for development during the lifetime of the Development Plan.
- The KCDP should introduce a 'Tier 3' or 'Strategic Land Reserve' policy to identify lands that are suitable for residential development in the medium to long term. Such a policy can avoid unnecessary shocks to the land supply market that would be caused by a stringent 'de-zoning' approach. The policy could allow these lands to be considered for development during the lifetime of the Development Plan in exceptional circumstances, where:
 - Population growth and housing demand is stronger than projected.
 - It is evident that Tier 1 and Tier 2 lands in the vicinity are not being brought forward for development.

Similar policies have been adopted by other Planning Authorities, such as Cork County Council and Meath County Council, and will ensure that there is some flexibility for the Development Plans to respond to pressures in the housing market.

3. Land Availability Review

3.1 Celbridge

Summary

- Of the five designated Key Development Areas, only KDA 3 at Oldtown and KDA 4 at Crodaun have seen units delivered during the lifetime of the Celbridge LAP.
- Priority should be given to zoning lands that can deliver units during the lifetime of the Development Plan.
- There is a need for headroom on zoned lands to account for:
 - Lands not being released for development.
 - Population growth, or housing demand, being stronger than projected in the Core Strategy.

Rationale

Of the 121 ha of land that were zoned in the Celbridge Local Area Plan, very limited land has been developed during the lifetime of the LAP. Of the five designated Key Development Areas (KDA), only KDA 3 at Oldtown and KDA 4 at Crodaun have seen units delivered. Infrastructure constraints and investment requirements have restricted development proposals on some lands. There has been no planning history on several land parcels, notwithstanding a severe shortage of housing supply and a high demand in the Celbridge area.

It is not possible to definitively establish why lands have not been brought forward for development. However, the case study of zoned lands in Celbridge has identified that there are considerable constraints to much of the land currently zoned. The primary constraints are:

- Investment in road infrastructure and a new bridge connection to facilitate development of lands to the south of the town.

The Celbridge case study demonstrates that there is a need for a detailed assessment on the deliverability of lands as part of the zoning process. Priority should be given to zoning lands where it can be demonstrated that units can be delivered during the lifetime of the Development Plan. There is also a need for headroom in the provision of zoned lands, to provide for some flexibility should lands not be brought forward for development, or if population / housing demand growth be stronger than projected in the Core Strategy.

4. Oldtown Lands, Celbridge

Summary

- A review of land zoning is being deferred to the production of Local Area Plans. This will result in a disconnect between the Core Strategy and zoning provisions and will also delay a review of capacity of land to deliver units during the lifetime of the Development Plan.
- OFC submit that the KCDP should include a review of land zoning in the main settlements as part of its review process.
- OFC's remaining landholding at Oldtown should be zoned as Tier 1 residential development lands because:
 - They are accessible to amenities and residential services.
 - They would consolidate the existing urban context.
 - They would be delivered during the lifetime of the forthcoming Development Plan.

Rationale

The draft KCDP does not provide any provision for zoning of lands in the main settlements, instead providing an objective to review and prepare on an ongoing basis a portfolio of LAPs for the mandatory LAP settlements (which includes Celbridge). Deferring a review of land use zoning provision not only means that many LAP zoning provisions will be out of step with the revised targets of the Core Strategy, but it also means that there is a delay in the undertaking a review of zonings to ensure that land zoned will facilitate the delivery of units during the lifetime of the Development Plan.

OFC submit that the KCDP should include a review of land zoning in the main settlements as part of the review process and not delay until the production of Local Area Plans.

OFC are currently completing the delivery of 251 units at Oldtown KDC 3, as permitted by Strategic Housing Development reference (ABP-303295-18). This development has provided considerable infrastructural benefits to the Oldtown environs, consisting of:

- Improvements to Shackleton Road, providing enhanced pedestrian, cycling and bus stop facilities.
- Improvements to the junction of Shackleton and Oldtown Road, improving traffic flow.
- Improvements to the surface water treatment in the local catchment.
- Improvements in the capacity of the foul water capacity in the local catchment.

OFC has a remaining land holding at Oldtown, as outlined in Figure 1.



Figure 1: OFC Landholding at Oldtown

OFC submit that these lands should be zoned as Tier 1 lands, for development during the lifetime of the Development Plan because:

- They would consolidate the existing urban context in the Oldtown area, being immediately adjacent to the SHD development currently being completed.
- The lands are accessible, with several amenities and residential services within walking distance. In assessing the SHD application the Board's Inspector noted that the site was within walking distance of a range of services including schools and the supermarket on the Shackleton Road.
- BusConnect proposals will see enhanced public bus services along the Shackleton Road, including improved services to the railway station at Hazelhatch.
- The works undertaken as part of the SHD development have provided capacity in the waste-water infrastructure for lands at Oldtown.
- OFC are active housebuilders and have demonstrated their commitment to bringing high quality housing units forward to the market. They remain committed to delivering housing units in Celbridge and would bring the Oldtown lands forward during the lifetime of the next Development Plan.

5. Submission Request

OFC recognise that Kildare County Council is required to prepare its draft development plan in line with national policy and guidelines, including the *Guidance on the Preparation of a Housing Need and Demand Assessment* (HNDA). It is also imperative that the Kildare County Development Plan sets out an **effective** strategy for the proper planning and sustainable development of the county. Give the evident weaknesses of the HNDA to reflect emerging housing needs at a county level it is incumbent on the Planning Authority to:

- Ensure that its land use zoning policies are sufficiently flexible to ensure that there is no shortage of residential lands during the lifetime of the Development Plan.
- Respond to the current crisis on the availability of affordable housing options in the County, by supporting the development of sustainable and affordable housing.
- Avoid causing a shock to the land supply market that will result in a significant increase in residential land prices and increased viability challenges for the development industry.
- Prioritise the zoning of lands that are likely to be delivered over the lifetime of the Development Plan.

To achieve these objectives OFC request that:

1. The draft HNDA is reviewed to take account of the stronger Regional Population growth evident in the Mid-East Region and Kildare County. It is submitted that the HNDA should be based on a minimum population projection of 287,180 in Kildare County by 2031, in line with CSO Regional Population projections 2017-2031 (M1F2 Dublin Outflow Scenario).
2. The draft HNDA is reviewed to allow for a quicker alignment of household size between Kildare County and the state, recognising that lack of affordable supply is a key factor in the county's current higher rate of household size (and low headship rates in younger age groups). It is submitted that the HNDA should be revised to allow for the household size rate in County Kildare to fall to 2.5 by 2040.
3. The Housing Target Assessment in section 2.54 of the Core Strategy is reviewed to take account of the frictional vacancy rate in the housing system. It is submitted that, at a minimum, the vacancy rate of 5.9% recorded in the 2016 Census for County Kildare should be applied.
4. In light of points 1 to 3, the dwelling target of 9,144 units to the end of the Development Plan period is adjusted to reflect the minimum requirement of **17,607** units.
5. That sufficient headroom is provided in the zoning of land to ensure that no shortage of land occurs during the lifetime of the development plan. At a minimum a provision of 25% headroom should be provided on

zoned land requirements. It should be recognised that the zoned land requirements provided in Table 2.8 of the Core Strategy are net figures and that there should be an allowance of around 15% to 20% in zoning lands to allow for site specific constraints.

6. That the KCDP introduce a 'Tier 3' or 'Longer Term Strategic Lands' residential zoning category, to identify lands that will be suitable for residential development in the longer term. Such lands should be allowed to be brought forward during the latter part the development plan process if it is evident that there is a shortage of land, or lack of delivery in Tier 1 or Tier 2 lands. Tier 3 lands could be subject to objectives which would ensure that the principles of sustainable, compact growth are retained, such as:
 - Lands would only be considered if delivery on tier 1 and 2 lands is proceeding faster than anticipated and additional land is required for the Plan period, or
 - That there are demonstrable constraints to lands zoned in Tier 1 or 2 being brought forward for development, and
 - That development of Tier 3 lands will not conflict with investment priorities, or compact growth objectives of the Development Plan.
7. That a policy objective is introduced to the KCDP that in zoning lands in forthcoming Local Area Plans, priority will be give to lands that provide:
 - **Accessibility:** ensuring that zoned lands are well connected to urban centres and existing residential services and amenities.
 - **Consolidation:** ensuring that zoned lands consolidate existing and permitted development within urban areas.
 - **Deliverability:** ensuring that zoned lands are deliverable in terms of the availability of infrastructure services and the likelihood of landowners bringing land forward for development during the lifetime of a Development Plan.
8. The KCDP should include a review of land zoning in the main settlements as part of the review process and not delay until the production of Local Area Plans.
9. OFC's remaining landholding at Oldtown, Celbridge should be included as Tier 1 zoned lands to be delivered in the lifetime of the forthcoming development plan.

Appendix 1 – Demographic Analysis

Population & Household Analysis – comparison

Table A1: Actual and Projected Population of Regional Authority Areas by Scenario, 2016 and 2036

Regional Authority Area	Actual Population	Projected Population 2036					
		Dublin Outflow			Dublin Inflow		
	2016	M1F2	M2F2	M3F2	M1F2	M2F2	M3F2
	'000						
Border	393.3	476.2	457.3	436.4	432.1	413.2	392.3
Dublin	1,335.9	1,589.9	1,491.5	1,400.9	1,860.7	1,762.4	1,671.9
Mid-East	690.9	965.3	937.1	906.8	876.2	848.0	817.7
Midland	293.4	405.4	393.9	383.3	339.2	327.6	317.0
Mid-West	472.5	553.0	530.6	506.3	548.4	525.9	501.6
South-East	421.2	500.2	489.7	477.5	446.9	436.4	424.1
South-West	685.0	812.8	781.2	750.9	809.5	777.9	747.7
West	447.5	509.7	490.5	468.5	499.5	480.3	458.3
State	4,739.6	5,812.5	5,571.7	5,330.6	5,812.5	5,571.7	5,330.6
Source: CSO Regional Population projections 2017 - 2036							

Table A2: Estimated Kildare Population to 2031, Based on CSO Projections

	2016	Projected Population to 2031					
		Dublin Outflow			Dublin Inflow		
	M1F2	M2F2	M3F2	M1F2	M2F2	M3F2	
	'000						
Mid-East	690.9	965.3	937.1	906.8	876.2	848.0	817.7
per annum (20-year period)		13.72	12.31	10.795	9.265	7.855	6.34
by 2031 (15-year period)		896.7	875.55	852.825	829.875	808.725	786
Kildare 32.8% allocation (1)		294.1176	287.1804	279.7266	272.199	265.2618	257.808

Source: Extrapolated from CSO Regional Population Projections 2017 - 2036

(1) Allocation of 32.8% in line with NPF roadmap projections for 2031.

Table A3 – Projected total households and average household size over HNDA period to 2031.

Year	Population Total	Number of Hsehdls	Average Hsehd size	Number of Anticipated Houses per annum	Total Houses between 2023 -2031
2016	222,504	73,596	3	638	
2017	225,654	74,581	3.03	985	
2018	228,804	75,799	3.02	1,218	
2019	231,954	77,700	2.99	1,901	
2020	235,104	79,221	2.97	1,521	
2021	238,254	80,752	2.95	1,531	
2022	241,404	82,340	2.93	1,588	
2023	244,553	83,921	2.91	1,581	
2024	247,702	85,451	2.9	1,530	
2025	250,851	86,943	2.89	1,492	
2026	254,000	88,451	2.87	1,508	
2027	256,500	89,994	2.85	1,543	
2028	259,000	91,587	2.83	1,593	
2029	261,500	93,136	2.81	1,549	
2030	265,000	94,651	2.79	1,515	
2031	266,500	96,180	2.77	1,529	
Household Change 2017 – 2031					22,584

Source: Table 15, Appendix 1, draft KCDP

Table A4: Revised Projected total households and average household size over HNDA period to 2031.

Year	Population Total	Number of Hsehlds	Average Hsehld size	Annual Growth in Hsehlds	Hsehld Growth 2023-2031
2016	222,504	73,596	3	638	
2017	226,816	74,857	3.03	1,261	
2018	231,128	76,532	3.02	1,676	
2019	235,440	78,742	2.99	2,210	
2020	239,752	80,725	2.97	1,982	
2021	244,064	82,734	2.95	2,009	
2022	248,376	84,886	2.93	2,152	
2023	252,688	87,059	2.90	2,173	
2024	257,000	89,267	2.88	2,208	
2025	261,312	91,512	2.86	2,245	
2026	265,624	93,794	2.83	2,282	
2027	269,936	96,114	2.81	2,320	
2028	274,248	98,473	2.79	2,359	
2029	278,560	100,873	2.76	2,399	
2030	282,872	103,313	2.74	2,441	
2031	287,184	105,796	2.71	2,483	
					20,910
Household Change 2017 - 2031					32,200

Source: Extrapolated Using the following assumptions:

- Population growth to 2031 in-line with CSO M2F2 Dublin Outflow projections, as detailed in CSO Regional Population Projections 2017 - 2. (See Table 4 of main report).
- Average household size falling in-line with projection for state to an average of 2.5 by 2040 (2.71 by 2.31).
- Assessment of growth in households – estimate of housing need provided in Tables 3 and 4 of main report, taking account of frictional vacancy rate of 5.9% (vacancy rate as recorded in 2016 Census data for Kildare).

Appendix 2 – Zoned Land Capacity

Review of Zoned Land in Celbridge

Celbridge Zoned Land Capacity Review

Analysis of deliverability

1. Introduction and Summary

As well as robust and consistent growth targets, national planning policy seeks compact growth and zoning of lands that can deliver housing within the lifetime of the relevant development plan / local area plan. There is an onus on Planning Authorities to undertake a critical assessment of the likelihood of land being available for development, taking account of:

- Infrastructure Capacity
- Ownership structure
- Willingness of landowners to bring development proposals forward and construct housing.

The following analysis provides an assessment of the lands zoned for New Residential within the Celbridge Local Area Plan 2017-2023 considering the site-specific constraints and planning history. The likelihood of land being brought forward for development can be assessed on the analysis of zoned land against the above criteria. The analysis excludes any assessment of the availability / capacity of ESB, Gas and Telecoms infrastructure. Constraints in the capacity of these utilities could further limit land being brought forward for development.

The analysis demonstrates that zoning land does not provide any guarantees that such land will be brought forward for development during the lifetime of a Development Plan (or Local Area Plan). Infrastructure constraints and requirements for masterplans limit the likelihood of lands being brought forward for development. In addition, the willingness of landowners to release lands for development is a critical factor.

Given the current crisis in the supply of housing, priority should be given to zoning lands that can demonstrate their capacity to deliver units within the lifetime of a Development Plan, are consistent with policy objectives to consolidate the existing urban context and are accessible to amenities and residential services.

2. Celbridge Zoned Land Analysis

2.1 Summary

- **KDA 1:** Due to its nature as an infill site the Planning Authority have applied lower density standards compared with other KDAs. This is reflective of the complexities of this site. Delivering this land within the lifetime of the development plan is unlikely due to ownership constraints and a lack of planning history. A number of issues have been identified that would significantly delay the planning process period of any proposed development on this site including the masterplan requirement included in the LAP, the capacity constraints of the Wastewater services in the Celbridge area and need to engage extensively with Irish Water and Kildare CoCo on solutions.
- **KDA 2:** This KDA is sizeable with a total of 29.5 hectares allocated for development yet there is no planning history associated with the entire site. A number of road improvements are required to be delivered in tandem with development of this land. The delivery of residential development in this KDA could be perceived as less cost effective for developers where contributions to the improvement of the existing road network may be required by the Planning Authority. The site is further constrained by the Flood Zone C designation traversing the site and the loss of developable land attributable to this. It is likely that a number of cost intensive mitigation measures will be applied to any development proposal for this site. In a separate section of the site an overhead cable will potentially need to be diverted to an underground cable again adding to the cost of developing this site.
- **KDA 3:** Extant permission and planning history indicates this land has been/will be developed within lifetime of development plan.
- **KDA 4:** Planning permission has been granted for two SHD developments, one site has commenced construction, and another is currently subject to a Judicial Review challenge.
- **KDA 5:** There is no planning history on this land which equates to a sizeable area (total 35 hectares). The willingness of landowners to bring the land forward for development is not evident. The site is not immediately available for development due to its dependence on the delivery of a new road and vehicular bridge. The impact of the road on the quantity of land available for residential development has not been clarified within the draft plan. The CFRAM maps also indicate a potential for flooding on the site and the cost of mitigating risk to residential amenity would likely be a consideration of any developer. Again, the requirement of a masterplan for these lands adds to the planning process timeframes involved and further impacts the likely delivery of these lands with the development plan period.

2.2 Analysis

The draft Kildare County Development Plan 2023-2028 (dKCDP) has significantly reduced the housing unit target for the whole County, including the settlement of Celbridge. Table 2.1 provides a comparison of key target metrics for Celbridge and the County between the existing development plan (16-23) and the dKCDP (23-28).

Settlement	Population Growth		Dwelling Target		Zoned Land (ha)	
	16-23	23-28	16-23	23-28	16-23 ¹	23-28
Celbridge	2,170	2,515	3,250	914	83 ²	30
County Total	31,422	25,146 ³	32,497	9,144		

Table 2.1 Core Strategy Comparisons

Celbridge will have a reduced housing target during the forthcoming Development Plan / Local Area Plan period but will retain a strong market demand for housing units. If additional units are not delivered there will be considerable upward pressure on house prices and rental rates.

Figure 1 identifies the 5 Key Development Areas within Celbridge. KDA's were identified in the 2017 LAP as strategic locations that could consolidate future growth.

Table 2.2 outlines the target housing capacity and area for each KDA set out in the 2017 LAP. This table indicates that in 2017, 107.1 ha of land was available between the KDA's. The dKCDP proposes to reduce the area of land required for residentially zoned land to 30 hectares for the forthcoming plan period 2023-2028.

The Celbridge Local Area Plan 2017-2023 (Celbridge LAP) indicated that there was 14.1 hectares of land available for residential development outside of the KDA's. A review of the land-use zoning map in the Celbridge LAP indicated that approximately 11 hectares of the additional zoned land were covered by the zoning 'New Residential' indicating that a further 3.1 hectares could be accommodated within the 'Existing Residential/Infill' zoning category.

Section 2.1 sets out an analysis of each KDA and the additional residential zoned lands from the Celbridge LAP and provides an assessment on the likelihood of land being available for development within the forthcoming development plan period.

¹ 2016 Zoned land figures taken from lands zoned in 2015, as detailed in Development Plan – does not account for any revisions to zoning in subsequent LAP reviews which provided additional lands.

² 2017 LAP zoned additional lands in Celbridge – 121 ha in total

³ Population growth target from baseline of 2021, while dwelling target figure takes account of units constructed up to 2022.

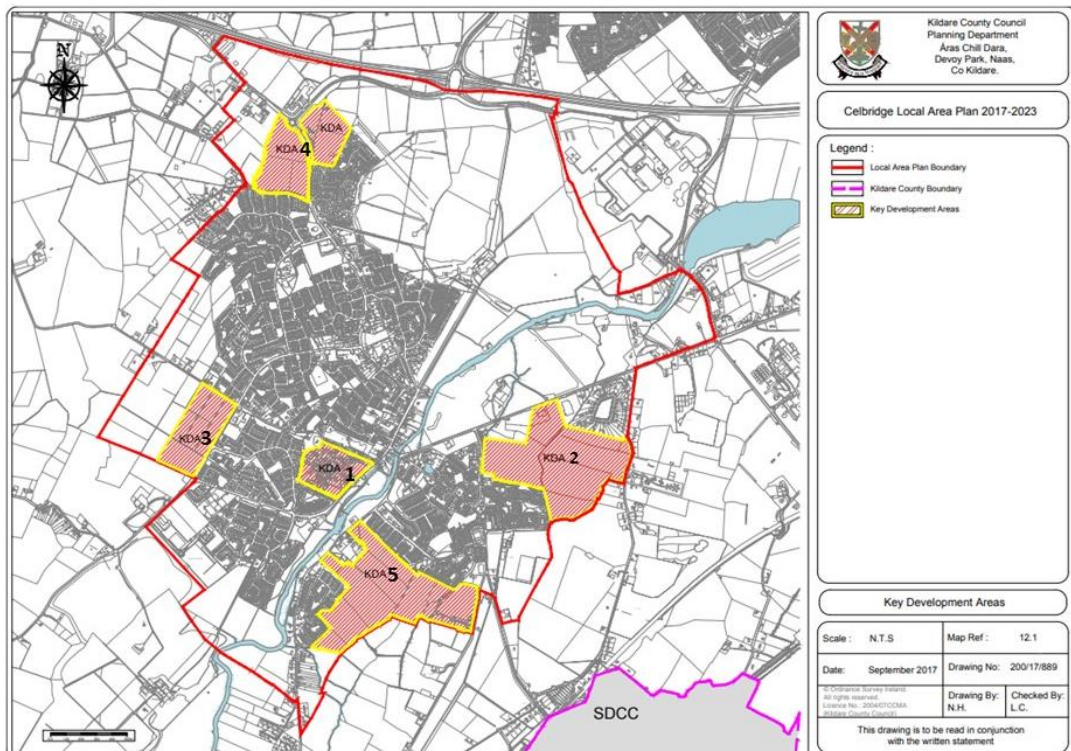


Figure 1 Map of Key Development Areas in Celbridge. Source: Celbridge Local Area Plan 2017

Key Development Area	Target Housing Capacity	Ha
1. St. Raphael's	100-150	9
2. Ballyoulster	885	29.5
3. Oldtown	411	13.7
4. Crodaun	497-597	19.9
5. Simmonstown	1050	35
Total KDA	2943-3093	107.1
New Residential ⁴	330	11
Existing Residential/Infill ⁵	93	3
Additional lands	423	14.1
Total Residential Lands	3,366-3516	121.2

Table 2.2 Housing capacity and size in hectares of KDA's set out in the Celbridge LAP 2017-2023

⁴ Estimated figure from analysis of Local Area Plan Zoning Map

⁵ Figure estimated from deducting 11 hectares on new residential land from 14.1 hectares of additional zoned land indicated in Local Area Plan

2.3 KDA 1 St. Raphael's (Oakley Park)

2.3.1 Site & Policy Context

St. Raphael's KDA comprises of approximately 9 hectares of residentially zoned land with a projected capacity for between 100-150 units. A lower density standard has been applied to this site compared to other KDA's. The LAP places an emphasis on mixed use proposals to consolidate the existing education and community uses in the area.

2.3.2 Planning History

There is no recent planning history for this site with the exception of some minor alterations to St. Raphael's Special School.

2.3.3 Constraints

Ownership

The land in this KDA is owned by St. John of God's Trust with HSE services operational on site. There is no recent planning history for the site related to residential development. Delivering the projected residential development target for this KDA within the lifetime of the next development plan/local area plan is not likely.

Masterplan

The LAP states that residential development in KDA 1 will be subject to a masterplan for the area. This process is likely to involve a number of stakeholders and will significantly increase the duration of the planning process for development of these lands.

Roads

The Celbridge Local Area Plan 2017-2023 Transport Objectives Map 8.1 identifies the proposed location of the upgrade works to the existing road and footpath along Tea Lane which is located to the north of the zoned residential lands.

Surface Water

Surface Water design for the site will be required to demonstrate compliance with the requirements of the Greater Dublin Strategic Drainage Strategy (GDSDS), the CIRIA SuDS Manual and the requirements of the Kildare County Development plan implementing Nature Based SuDS (NBS) and Natural Water Retention Measures (NWRM). Particular emphasis will be required to deliver SuDS systems which dispose surface water run-off into the ground through the provision of porous pavement such as permeable paving, swales, and detention basins and the retention of water in storage areas on the site through the construction of green roofs, rainwater harvesting, detention basins, ponds, and wetlands.

Water & Wastewater

Further to recent consultation with IW, the Connections and Developer Services (CDS) Team have noted there are capacity constraints in the Celbridge Area which will be alleviated through the completion of the Capital Projects including the Celbridge LNRP contract (Primrose Hill) and WWPS Rising Main Upgrade Programme. The Primrose Hill and Castletown projects are due for completion in 2024 and 2026 respectively and are subject to change. In advance of the completion of the Capital Projects, IW have in the past permitted storm sewer separation works to be carried out in Celbridge, however, these works require consent and co-operation from Kildare Co. Co. Water Services Department. A Pre-Connection Enquiry will be required to determine if there any local network capacity constraints requiring upgrading by the developer.

Flooding

The Celbridge Strategic Flood Risk Assessment (SFRA) (refer to Figure 3 below) and CFRAMS Flood maps (refer to Figure 4 below) shows that the site is located in Flood Zone C and identifies flooding to the south-east of the site outside of the extents of the zoned lands. A Site-Specific Flood Risk Assessment will be required as part of a Planning Application.

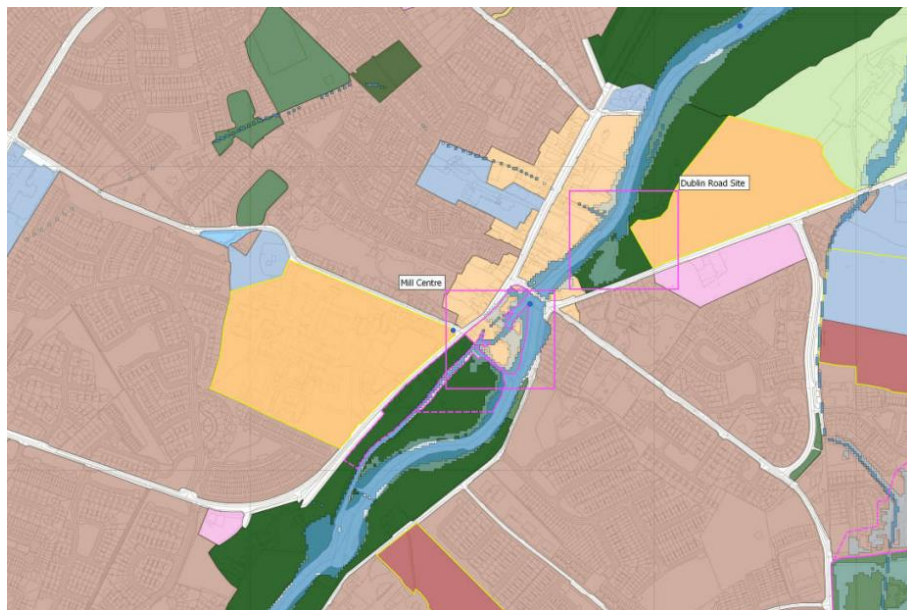


Figure 2 Extract from Celbridge SFRA illustrating Fluvial Flooding to the south-east of the site and outside of the zoned land extents

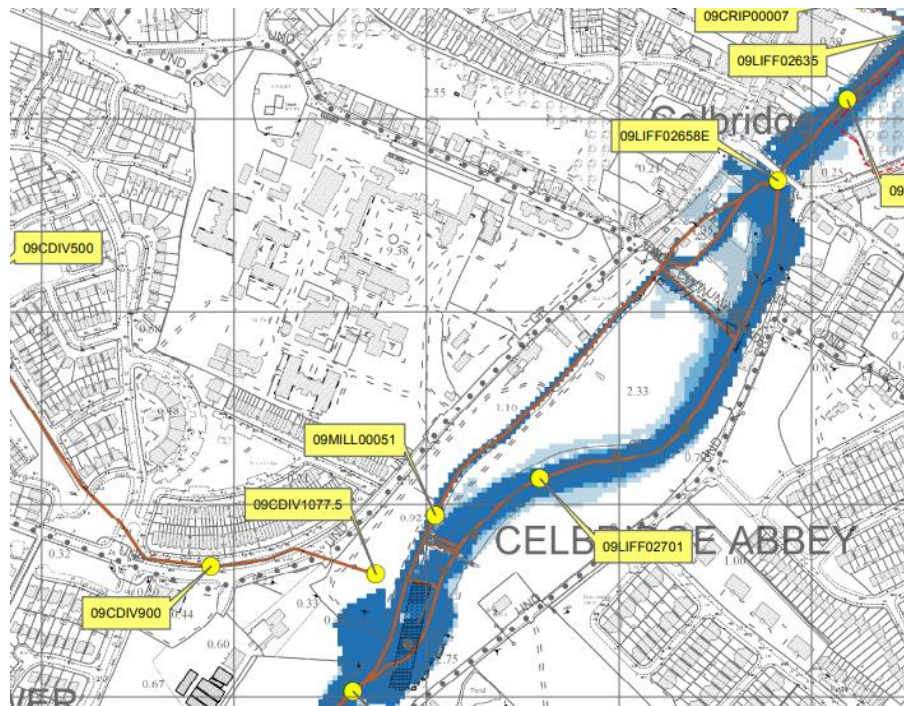


Figure 3 Extract from CFRAMS flood maps illustrating Fluvial Flooding to the south-east of the site and outside of the zoned land extents

2.4 KDA 2 Ballyoulster

2.4.1 Site & Policy Context

The Ballyoulster KDA comprises of approximately 29.5 hectares of land. The LAP sets out a target of 885 housing units to be delivered on this land, equating to a density of 30 units/ha.

2.4.2 Planning History

There is no recent planning history for this land.

2.4.3 Constraints

Ownership

This land is owned by NAMA.

Phasing & Infrastructure

Delivering the full potential of this land will require significant infrastructure improvement. The LAP sets out that new pedestrian and cycle link improvements will be required, including the construction of a new sustainable transport bridge or improvement to the existing bridge, prior to the occupation dwelling units 351 in this KDA. This reduces the capacity of the immediately deliverable residential land by 60% to 11.8 hectares.

Specific Objectives

The KDA is subject to objectives requiring the upgrade of roads and footpaths prior to the commencement of development.

The Celbridge Local Area Plan 2017-2023 Map 8.1 Transport Objectives identifies the following to be delivered on the zoned residential lands as illustrated in Figure 5 below;

- MTO 3.9 To facilitate the construction of a road from Hazelhatch Park to Newtown Road in tandem with development of KDA 5 and in the interim to protect this route from development,
- MTO 1.4c Resurface footpaths on the Dublin Road where required,
- MTO3.14g Upgrade to the Loughlinstown Road in conjunction with road objectives for KDA 3.
- New pedestrian and cycle infrastructure traversing the site north-south and east-west.

In addition, the following objectives have been identified on the Loughlinstown Road immediately to the north of the zoned lands as illustrated in Figure 5 below.

- MTO 1.4d Full provision for pedestrians and cyclists, including public lighting, on Loughlinstown Road as part of road objectives for KDA 3
- MTO 3.14g Upgrade the Loughlinstown Road in conjunction with road objectives for KDA 3.

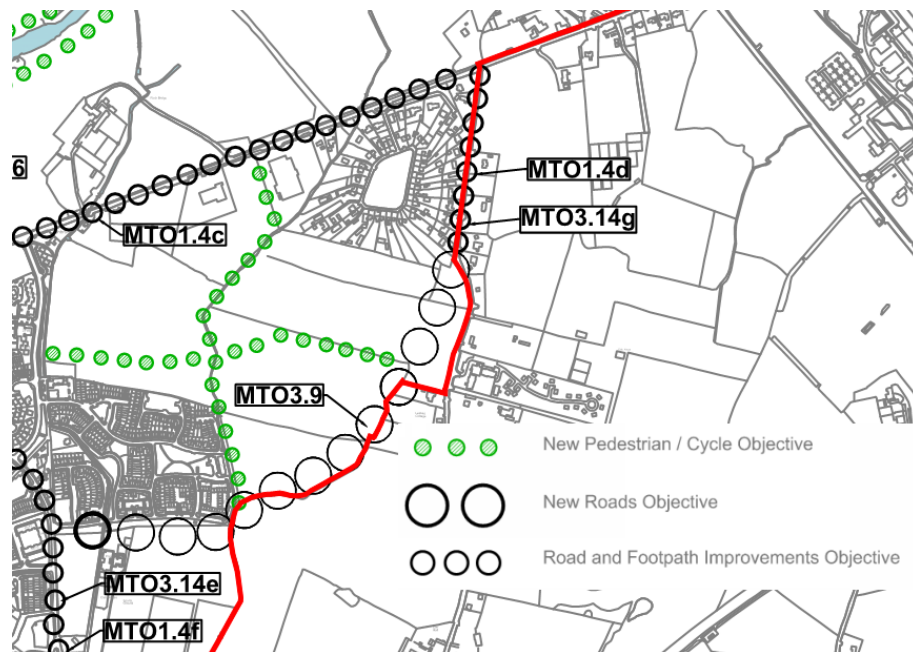


Figure 4 Extract from the Celbridge Local Area Plan 2017-2023 Map 8.1 Transport Objectives

Surface Water

Surface Water design for the site will be required to demonstrate compliance with the requirements of the Greater Dublin Strategic Drainage Strategy (GDSDS), the CIRIA SuDS Manual and the requirements of the Kildare County Development plan implementing Nature Based SuDS (NBS) and Natural Water Retention Measures (NWRM). Particular emphasis will be required to deliver SuDS systems which dispose surface water run-off into the ground through the provision of porous pavement such as permeable paving, swales, and detention basins and the retention of water in storage areas on the site through the construction of green roofs, rainwater harvesting, detention basins, ponds, and wetlands.

Water & Wastewater

Further to recent consultation with IW, the Connections and Developer Services (CDS) Team have noted there are capacity constraints in the Celbridge Area which will be alleviated through the completion of the Capital Projects including the Celbridge LNRP contract (Primrose Hill) and WWPS Rising Main Upgrade Programme. The Primrose Hill and Castletown projects are due for completion in 2024 and 2026 respectively and are subject to change. In advance of the completion of the Capital Projects, IW have in the past permitted storm sewer separation works to be carried out in Celbridge, however, these works require consent and co-operation from Kildare Co. Co. Water Services Department. A Pre-Connection Enquiry will be required to determine if there are any local network capacity constraints requiring upgrading by the developer.

Flooding

The zoned lands are identified as being under review by CFRAMS, however, the current maps have identified the lands as Flood Zone C with Fluvial Flooding identified along the channel of the watercourse which traverses the zoned lands south-north and along the western boundary as indicated in Figure 6 below. The Celbridge Strategic Flood Risk Assessment (SFRA) notes that the site will be subject to a Site-Specific Flood Risk Assessment (SSFRA) to be carried out taking cognisance of the area prone to flooding.

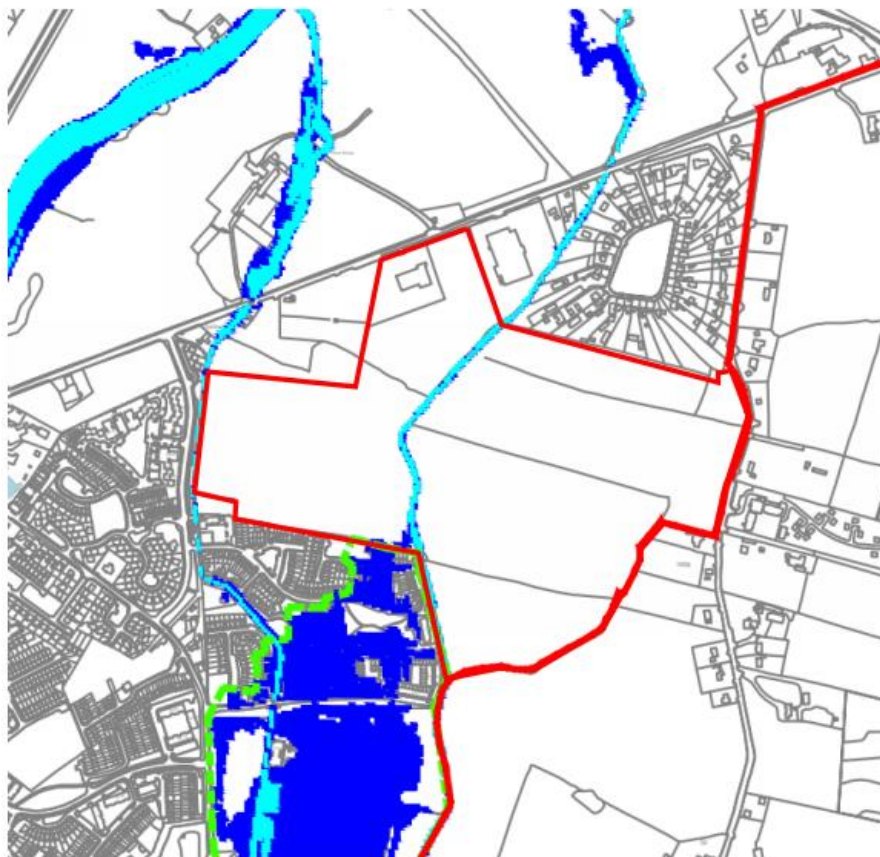


Figure 5 Extract from Celbridge SFRA illustrating Fluvial Flooding through and along the western boundary of the zoned lands

ESB

Existing overhead (O/H) powerlines traverse a portion of the site as indicated in Figure 7 below from east-west and it is assumed that these will be diverted and undergrounded as part of any proposed development.

2.5 KDA 3 Oldtown

2.5.1 Site & Policy Context

The Oldtown KDA is located to the west of the town and is bound by the R403/ Shackleton Road to the east, the oldtown road to the north and agricultural lands to the south and west. This KDA comprises approximately 13.7 hectares of residentially zoned land with a density target of 30 units per hectare.

2.5.2 Planning History

Planning Reference	Applicant	No. of Units	Area	Status	Commenced
ABP-303295-18	O'Flynn Construction Ltd	251	9.38ha	Granted	Yes
ABP-312958-22	Glenveagh Homes Ltd.	152	4.71ha	Lodged – decision pending	No

Table 2.3 Planning History for KDA 3 Oldtown

The 9.38 ha of OFC landholding has been fully developed, leaving a balance of 4.71 ha of land remaining in the Oldtown KDA.

2.5.3 Constraints

Servicing constraints were addressed on OFC lands. The application submitted by Glenveagh Homes Ltd. did not identify any infrastructure constraints for their development.

2.6 KDA 4 Crodaun

2.6.1 Site & Policy Context

The Crodaun KDA comprises approximately 19.9 hectares of land zoned for residential development with a target density of between 25-30 units per hectare. This equates to a housing target of between 497 to 597 units.

2.6.2 Planning History

Planning Reference	Applicant	No. of Units	Area	Status	Commenced
ABP-306504-20	Ardstone Homes Limited	372	9.18ha (9.55 in total including open space)	Granted	Yes
ABP-307100-20	Crodaun Development Co. Ltd	467	12.68 ha	Granted	No

Table 2.4: Planning History for KDA 4 Crodaun

2.6.3 Constraints

Phasing

The LAP sets out a requirement for a pro-rata provision of childcare facilities to delivered in two phases: from units 1-150 and from 151 to completion of development.

Roads

The Celbridge Local Area Plan 2017-2023 Map 8.1 Transport Objectives identifies the requirement for a pedestrian and cycle link to be provided along the southern boundary of the zoned lands.

Surface Water

Surface Water design for the site will be required to demonstrate compliance with the requirements of the Greater Dublin Strategic Drainage Strategy (GDSDS), the CIRIA SuDS Manual and the requirements of the Kildare County Development plan implementing Nature Based SuDS (NBS) and Natural Water Retention Measures (NWRM). Particular emphasis will be required to deliver SuDS systems which dispose surface water run-off into the ground through the provision of porous pavement such as permeable paving, swales, and detention basins and the retention of water in storage areas on the site through the construction of green roofs, rainwater harvesting, detention basins, ponds, and wetlands.

Water & Wastewater

Surface water separation works have occurred in Celbridge to date to provide capacity on the “Crodaun SHD” development site.

Flooding

Both CFRAMS and the Celbridge SFRA identify the zoned lands as being located in Flood Zone C as illustrated in Figure 10 and Figure 11 below while CFRAMS has identified Fluvial Flooding along the southern boundary of the zoned lands. A Site-Specific Flood Risk Assessment will be required as part of a Planning Application and the development will be required to take cognisance of the area prone to flooding.

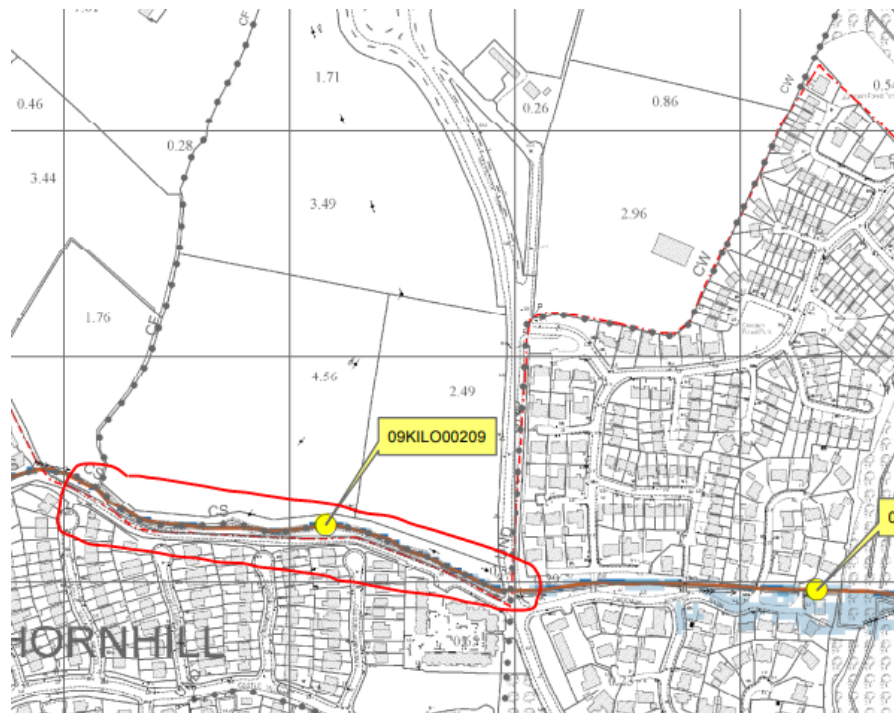


Figure 7 Extract from CFRAMS flood map

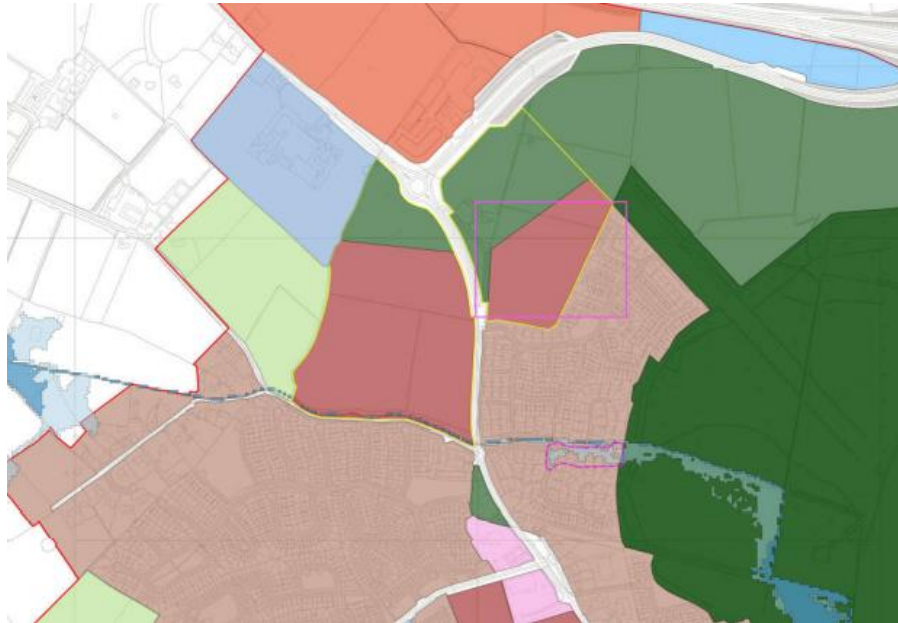


Figure 8 Extract from Celbridge LAP 2021-2017 SFRA

ESB

Existing 10kV overhead (O/H) powerlines traverse the site, and it is assumed that these shall be diverted and undergrounded as part of any development. The existing O/H lines are illustrated in green in Figure 12 below.

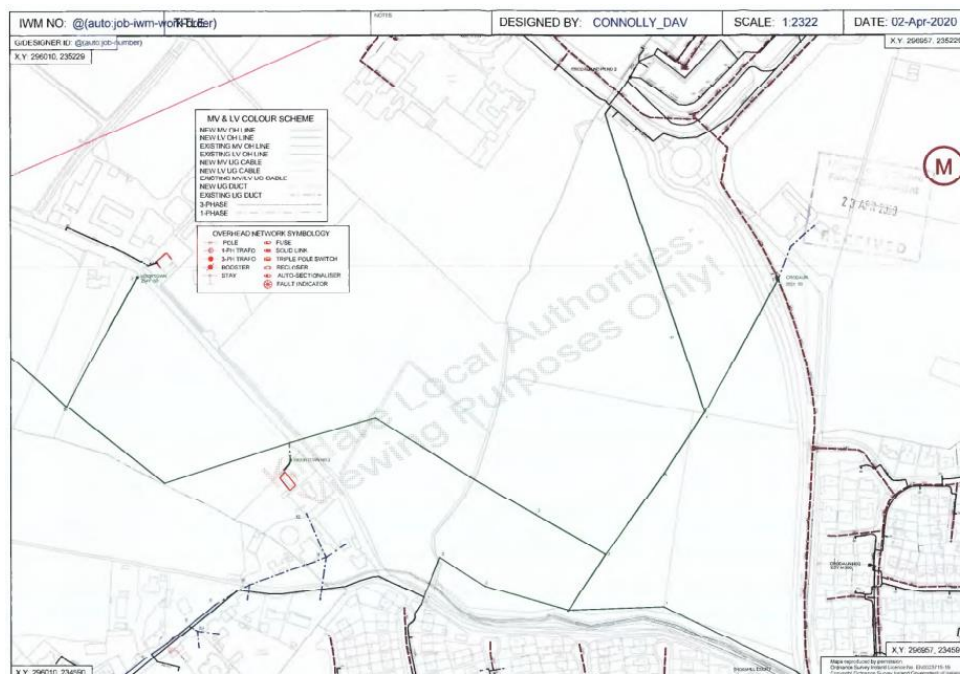


Figure 9 Existing 10kV O/H powerlines traversing the zoned lands

2.7 KDA 5 Simmonstown

2.7.1 Site & Policy Context

The Simmonstown KDA comprises approximately 35 ha of residentially zoned land with the stated capacity to deliver 1050 units. The density target for this KDA is medium to low residential development at 30 units per hectare.

2.7.2 Planning History

There is no recent planning history for these lands.

2.7.3 Constraints

Infrastructure

This KDA is significantly restricted in its capacity to deliver residential development in the short term due to the need for infrastructure to be delivered in advance of development. The LAP requires that a new River Liffey vehicular road and link bridge be completed prior to the commencement of development in the KDA. Public consultation on the Emerging Preferred Route closes on the 6th May 2022. According to a Public Consultation Roadmap prepared by MHL consulting engineers the project is a year behind its initial schedule. This means that the design and planning phases will also be delayed and likely to occur in the later part of 2023 instead of 2022 as originally planned.

An overhead power Line traverses the site and will require an appropriate buffer reducing the site area.

Specific Objectives

The following Specific Objectives related to roads infrastructure have been identified in and around the zoned lands as follows and as illustrated in Figure 13 below

- MTO1.4a To provide footpaths and public lighting at the following locations At the east side of the Newtown Road as part of development of KDA 6
- MTO3.7 To facilitate the construction of a new vehicular river crossing between the Clane Road and Newtown Road within either of the two protected corridors, as indicated on Map 8.1, subject to environmental assessment.
- MTO3.12 To facilitate the construction of a new vehicular river crossing between the Clane Road and Newtown Road within either of the two protected corridors, as indicated on Map 8.1, subject to environmental assessment.
- MTO3.13 To protect from development a route for a potential new road (including a new bridge over the River Liffey) between Clane Road (near the Celbridge North Kildare Educate Together School) and Hazelhatch Park
- MTO3.14c Improve and widen Newtown Road as part of the development of KDA 5

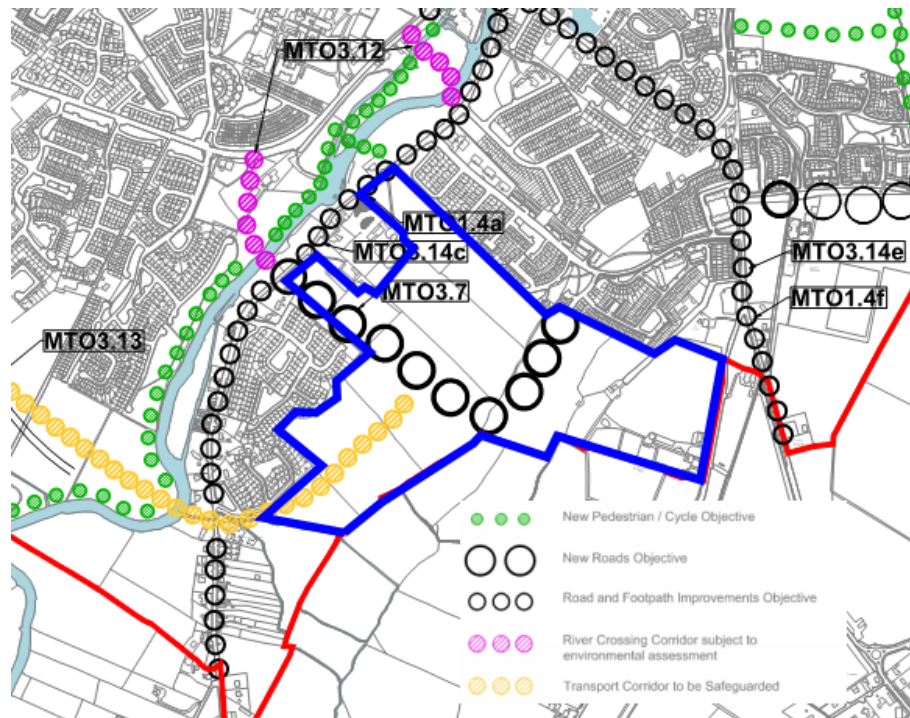


Figure 10 Extract from Celbridge LAP Roads objectives map 8.1

Surface Water

Surface Water design for the site will be required to demonstrate compliance with the requirements of the Greater Dublin Strategic Drainage Strategy (GDSDS), the CIRIA SuDS Manual and the requirements of the Kildare County Development plan implementing Nature Based SuDS (NBS) and Natural Water Retention Measures (NWRM). Particular emphasis will be required to deliver SuDS systems which dispose surface water run-off into the ground through the provision of porous pavement such as permeable paving, swales, and detention basins and the retention of water in storage areas on the site through the construction of green roofs, rainwater harvesting, detention basins, ponds, and wetlands

Water & Wastewater

Further to recent consultation with IW, the Connections and Developer Services (CDS) Team have noted there are capacity constraints in the Celbridge Area which will be alleviated through the completion of the Capital Projects including the Celbridge LNRP contract (Primrose Hill) and WWPS Rising Main Upgrade Programme. The Primrose Hill and Castletown projects are due for completion in 2024 and 2026 respectively and are subject to change. In advance of the completion of the Capital Projects, IW have in the past permitted storm sewer separation works to be carried out in Celbridge, however, these works require consent and co-operation from Kildare Co. Co. Water Services Department. A Pre-

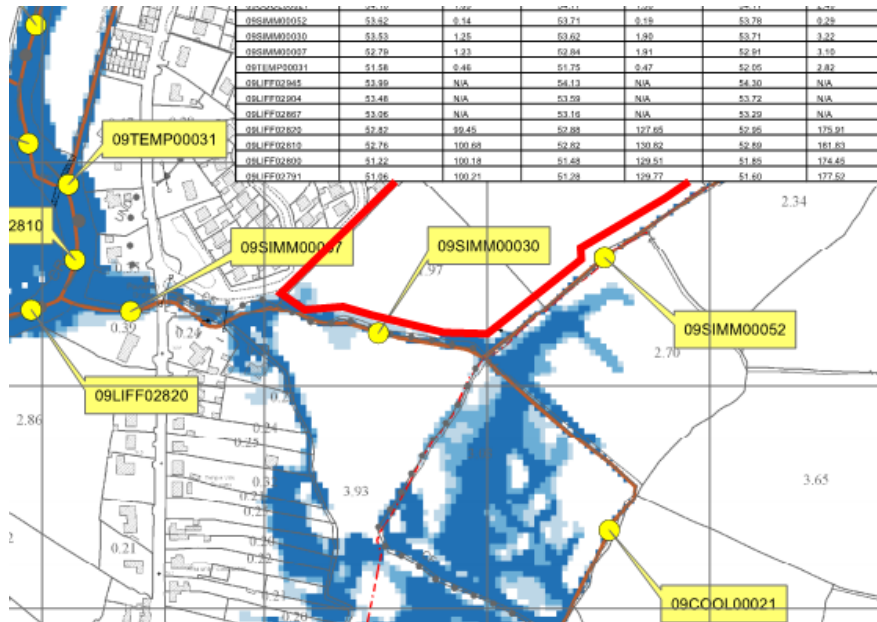


Figure 12 Extract from CFRAMS Flood map

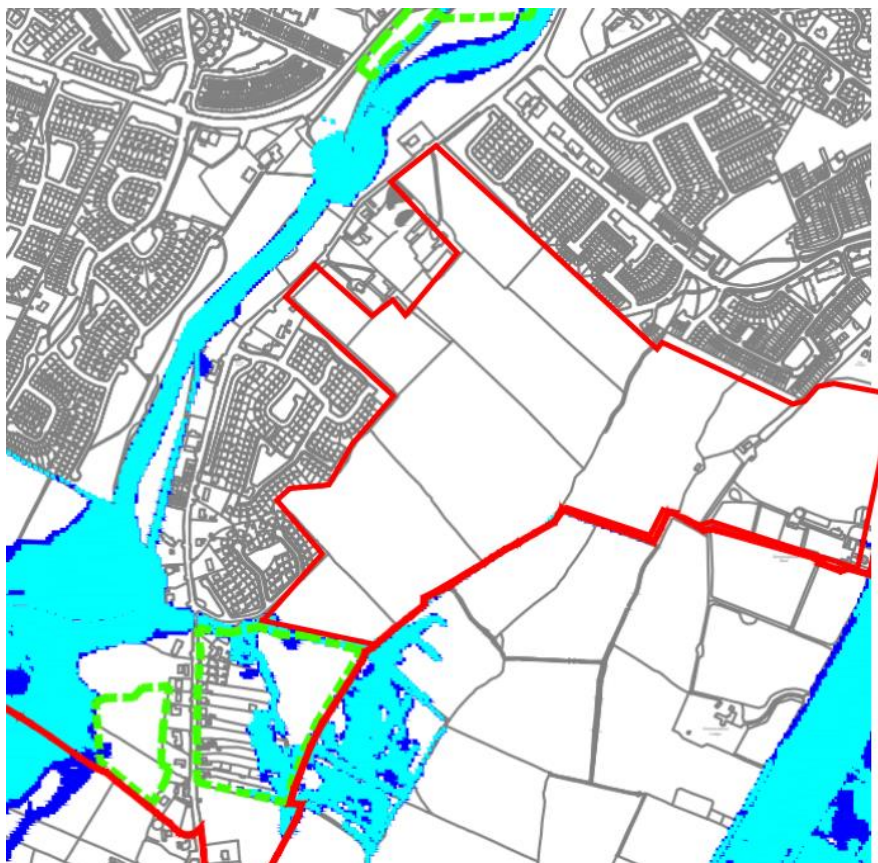


Figure 13 Extract from Celbridge 2021-2027 Strategic Flood Risk Assessment Map 9.1

ESB

Existing overhead (O/H) powerlines traverse the site and it is assumed that these shall be diverted and undergrounded as part of any development. The existing O/H lines are illustrated in blue in Figure 17 below.

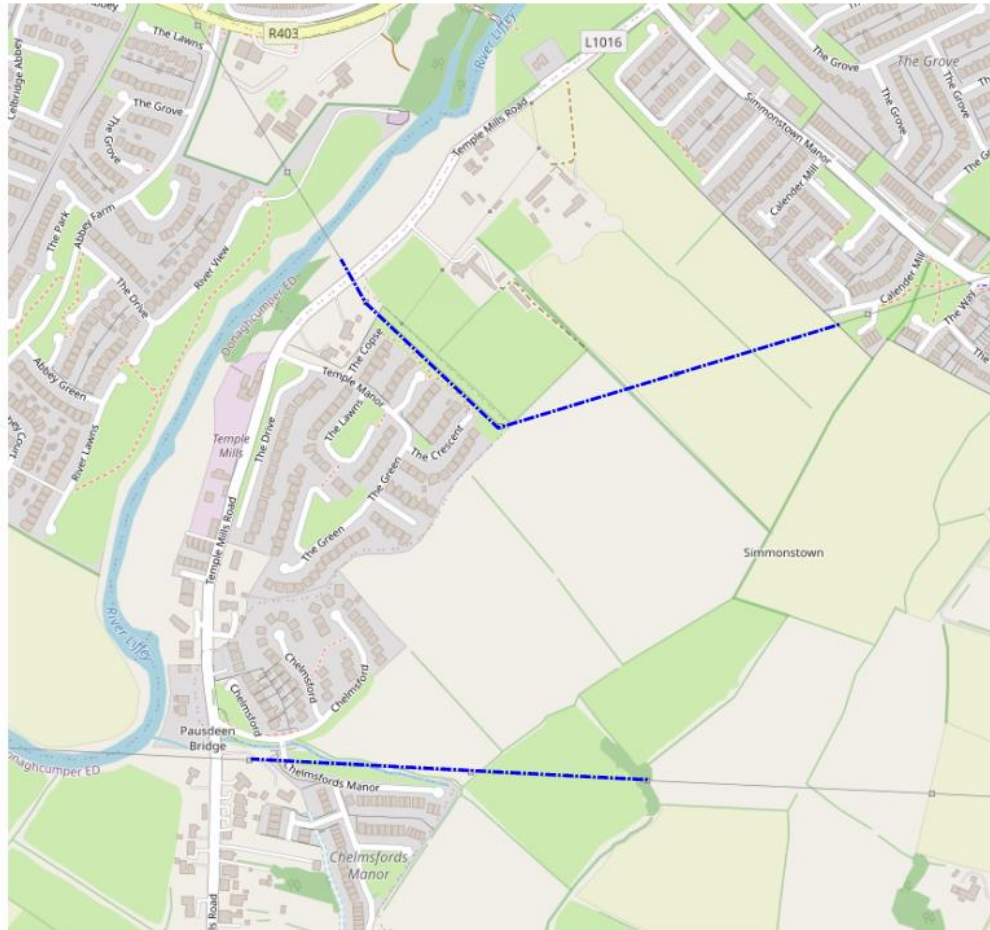


Figure 14 Existing O/H powerlines traversing the site

Masterplan

A master plan is to be prepared for these lands prior to the commencement of any development. The masterplan must provide public open space at a minimum rate of 15% of the total site area. This immediately reduces the land available for residential development to 29.75 ha and approximately 892 units from 1050 units.

2.8 Additional Zoned Lands

2.8.1 Planning History

In order to determine the planning history of these additional zoned lands data from the Council's planning register map was cross-referenced with *Map 13.1 Land-Use Zoning* of the Celbridge Local Area Plan 2017-2023. The following planning applications are of note:

New Residential:

Planning Reference	Development Address	No. of Units	Area	Status	Commenced
19/1282	Phase 3, Oldtown Mill, Celbridge, Co.Kildare	75	2.2	Granted	Yes
18/1481 ABP Ref: 305886	Newtown Townland, Celbridge, Co. Kildare	55	2.15	Granted on Appeal	Yes
16/260	Thornhill Road and Maynooth Road, Celbridge, Co.Kildare.	79	3.13	Granted	Yes

Table 2.5 Planning History for New Residential zoned lands

Existing Residential/Infill:

Planning Reference	Development Address	No. of Units	Area	Status	Commenced
22/281	Celbridge Lodge, Tea Lane / Church Road, Celbridge, Co. Kildare.	60	2.73	Decision due 8 th May	No
17/63	Abbeyfarm Estate, Celbridge Abbey, Celbridge, Co. Kildare.	6	0.93	Granted	Yes

Table 2.6 Planning History for Existing Residential/Infill zoned lands

The above planning history shows permissions granted and extant permissions on 'additional lands' since 2017 and indicates that a total of 11.12 hectares of the 14.1 hectares

have been accounted for. Approximately 2.96 hectares of land remains available for residential development within the ‘additional lands’ category. An estimated 2.6 hectares is available on lands adjacent to the site for 19/1282 at Oldtown Mill, Celbridge, Co. Kildare resulting in 0.36 hectares remaining for infill developments.

3. Summary of Celbridge

Table 3.1 below summarises the likelihood of the existing zoned lands to deliver housing within the lifetime of the forthcoming Development Plan.

Key Development Area	Total Area	Capacity to Deliver during Lifetime of Development Plan
1. St. Raphael's	9	Limited – lack of any planning history on the site.
2. Ballyoulster	29.5	Limited – no planning history and several constraints associated with the site.
3. Oldtown	13.7	250 units completed by OFC. Remaining 2.6 ha lands with live SHD planning application – likely to be delivered during lifetime of Development Plan.
4. Crodaun	19.9	Planning history for 839 units, of which approximately 200 have commenced.
5. Simmonstown	35	Unlikely given dependency on new road and vehicular bridge.
Additional Zoned Lands	14.1	Estimated 2.96 ha of land remain available for delivery during lifetime of next Development Plan.
Total	121.2	

Table 3.1 Summary of capacity of LAP residential zoned land following a review of constraints.

Oldtown KDA 3 and Crodaun KDA 4 are the only Key Development Areas identified in the Celbridge Local Area Plan that have delivered housing during the lifetime of the existing Local Area Plan. There has been no planning history on KDAs 1 (St Raphaels), 2 (Ballyoulster), or 5 (Simmonstown). While planning permission has been granted for two SHD developments on Crodaun KDA, one of these permitted developments has been delayed by Judicial Review.