

Our Ref. 22217/EMP

**CUNNANE STRATTON REYNOLDS**

Your Ref. 'Draft County Development Plan Submission'

The Administrative Office

Forward Planning

Áras Chill Dara

Devoy Park

Naas,

Co. Kildare.

W91X 77F

24<sup>th</sup> May 2022

**SUBMISSION VIA CONSULTATION PORTAL**

**RE: KILDARE COUNTY DRAFT DEVELOPMENT PLAN 2023-2029**

**Submission via the Planning Consultation Planning Portal in respect of Kellsborough House and associated lands, Newbridge, Co. Kildare**

Dear Sir/Madam,

We refer to the above and make this submission on behalf of Mr. Brendan O'Donoghue, RBK, Parkview House, Beech Hill Office Campus, Clonskeagh, Dublin 4, DD4 XX7V2, appointed Receiver over Certain Assets of Newbridge Partnership (in Receivership) that include Kellsborough House and associated lands at Newbridge, Co. Kildare.

***Introduction***

Our client wishes to congratulate Kildare County Council on the production of an extensive document that seeks to promote jobs, support the provision of new homes, support a high quality of life, and address climate change challenges. Our client recognises the difficulties of addressing the housing crisis when we are operating in challenging and unprecedented times with Covid, Brexit, geo-political instability and climate change.

***Executive Summary***

The following are the key points from this submission:

- A submission for the rezoning of the subject site at Kellsborough House in Newbridge from agriculture to residential will be made in due course when the Newbridge Draft LAP is placed on public display.

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- The quantum and development potential of lands in the new Newbridge Local Area Plan should be maximised and be sufficient flexibility consistent with (1) the emerging County Plan; (2) the provisions of the National Planning Framework (NPF); (3) the role of Newbridge as envisaged in the Eastern and Midlands Regional (EMRA) Regional Spatial and Economic Strategy (RSES); (4) relevant guidance issued under Section 28 of the Planning and Development Act 2000 (as amended); and (5) the proper planning and sustainable development of both the town and the county as a whole.
- Newbridge has the largest population in the county, the largest growth rate in the county at nearly twice the next town's (Maynooth) rate of growth since the last census (2016).
- The growth rate for population and housing allocated to Newbridge at 11.6% in the emerging Core Strategy is inadequate for its population, population growth rate and recent level of housing completions.
- Newbridge is unlikely to have a Draft LAP until 2023 at the earliest with the existing adopted LAP extended 4 years until December 2022 and it is questionable as to whether it could be extended again. Regrettably a 'new' LAP for the town that should have been adopted several years ago has not materialised and in that period sites have not come forward for zoning despite there being significant population growth and substantial housebuilding in the town.
- Housing growth allocated in the emerging County Plan for the period 2023 to 2028 for Newbridge is only 1,061 units. The number of units to be required over the 6 year period of either the emerging CDP or the subsequent Newbridge LAP should be 1,284 units.
- We are concerned that sufficient land will be zoned to accommodate adequate future growth and demand in the town evidenced by the County Councils own key performance indicators of growth.
- The capacity of Osberstown Waste Water Treatment Plant has been substantially increased since the adoption of the current Newbridge LAP in 2013 and there are no longer considered to be infrastructure constraints.
- A realistic assessment of the likelihood of implementation must also be made for zoned sites, having regard to the remaining duration of such permissions, as well as recent rates of delivery and market absorption by development type. Housing guidance indicates that dezoning should be considered where existing zoned sites have not come forward for development over several plan periods and where unzoned sites, such as our clients, more closely align with the sequential approach and the concept of compact urban form.
- Local authorities should make sure that there is sufficient provision for the delivery of housing to meet identified demand, having regard to the availability of services, the rate of take-up of development land (brownfield/infill and greenfield) and the pattern of housing completion, including rural housing, where applicable.
- Encouragement should be given to zoning sites that meet the sequential approach advocated in para 4.19 of the Ministerial Guidelines on Development Plans and also the following paras of the Ministerial Guidelines on 'Housing Supply Target Methodology for Development Planning' (2020) namely 4.5 (achievement of compact growth and consolidation of towns); para 4.6 (necessary support services and infrastructure for a new community and public transport accessibility); and para 4.7 (physical and social infrastructure such as water services, schools and public amenities, and recreational facilities and energy and communications networks). Any proposed zoning should also be cognisant of the '10 Minute City' for towns, as well as cities, whereby a range of uses for sustainable living are located within 10 minutes walking or cycling of proposed residential neighbourhoods.

- Of the 20 adopted LAP zoned sites some 9 no. are either completed or under construction. There are a further 4 no. sites that are committed in planning terms. There are an additional 2 no. sites that are the subject of a current SHD application. There are only 5 further sites that are uncommitted and have been since the adoption of the LAP in 2013, have never been the subject of any application and one must question, in line with the appropriate Housing Guidelines whether there is a reasonable prospect of those sites ever coming forward for development.

### ***The Purpose of this Submission***

Our client will, at the appropriate time when the Newbridge Local Area Plan 2013 – 2022 is being reviewed, be making a submission for the rezoning of the subject site at Kellsborough House in Newbridge from agriculture to residential.

We are aware that all Local Area Plans must be consistent with not only national and regional planning policy and guidance but also with the relevant County Development Plan. It is for this reason that we make this submission on behalf of our client on the emerging County Development Plan 2023-2029 and in particular the allocation of population and housing growth which are matters for the emerging County development Plan to determine as part of its Core Strategy.

*At this stage, our client wishes to ensure that the quantum and development potential of lands in Newbridge as to be set out in the new Newbridge Local Area Plan is maximised and contains sufficient flexibility to be consistent with (1) the emerging County Plan; (2) the provisions of the National Planning Framework (NPF); (3) the role of Newbridge as envisaged in the Eastern and Midlands Regional (EMRA) Regional Spatial and Economic Strategy (RSES); (4) relevant guidance issued under Section 28 of the Planning and Development Act 2000 (as amended); and (5) the proper planning and sustainable development of both the town and the county as a whole.*

### ***Demographic Background and Settlement Status of Newbridge***

Newbridge is the most populous settlement in County Kildare which is not reflective of its place in the settlement hierarchy for the county, as a 2<sup>nd</sup> tier (after Naas) Large Growth Town II. This primacy of Newbridge is retained in the updated regional planning aspirations in the RSES where it is identified as a Level 2 Major Town Centre.

Newbridge's population at the time of the 2016 census was 22,742. This is a growth rate of 32.78% in the period 2011-2016, the largest in the county at nearly twice the next town's (Maynooth) rate of growth (16.59%) over the same period. We believe that the above should be borne in mind when considering the future allocation of population for the town which will determine other development factors including the amount of land to be zoned for future residential development. Since the 2016 census, the 2017 County Plan in Section 1.3 (Key Challenges) recognises that '*some of the larger towns such as Newbridge experienced lower levels of population growth due to infrastructural constraints.*' We would expect that remaining infrastructural constraints would be addressed in the emerging County Plan as it is clear Newbridge experienced higher than anticipated rates of population growth reflective of its requirement to accommodate further population growth and reflective of substantial housebuilding, as set out below.

The Newbridge Local Area Plan was made in 2013 amended in 2015 and extended in December 2018 to 22<sup>nd</sup> December 2022. A particular concern that our client has is that it is our understanding that the new Newbridge LAP cannot be formulated and presented in draft, much less adopted, until such time as the emerging County Plan is adopted, and from what we are told, until after the Maynooth LAP is also adopted. This essentially means that Newbridge is unlikely to have a Draft LAP until 2023 at the earliest. This plan has already been extended 4 years until December 2022 and it is questionable as to whether it could be extended again. Regrettably a 'new' LAP for the town that should have been adopted several years ago has not materialised and in that period sites have not

come forward for zoning despite there being significant population growth and substantial housebuilding in the town.

The target for new housing units in the Newbridge LAP 2013-2019 (as amended and extended) was 2,609. This number of units was deemed to be required to accommodate the projected population for that plan period, plus 50%<sup>1</sup>, and took account of any units which had been permitted but not yet constructed in 2013. This 2,609 is for the period to 2019 but housing growth allocated in the emerging County Plan for the period 2023 to 2028 for Newbridge is only 1,061 units.

The LAP intended for 2,609 units to be provided in the town through new permissions from 2013 to 2019. A gross total of 102 ha of undeveloped land was zoned for residential development to achieve that target.

As indicated below the population and household targets for Newbridge have been revised from those originally contained in the County Plan when it was adopted, downwards as a result of revised and downward projections emanating from the NPF and derived to Newbridge in the EMRA RSES. We are concerned that sufficient land will be zoned to accommodate adequate future growth and demand in the town evidenced by the County Councils own key performance indicators of growth.

### ***The Emerging County Development Plan 2022-2028***

The key principles for the emerging County Development Plan are contained in section 1.8.1 (Overarching Guiding Principles) and are as follows:

- (i) To develop a county that is resilient to climate change, plans for and adapts to climate change and flood risk, facilitates a low carbon future, supports energy efficiency and conservation and enables the decarbonisation of our lifestyles and economy;
- (ii) To ensure the compact growth and regeneration of lands within all settlements across the Settlement Hierarchy;
- (iii) To promote the sustainable development of communities by locating residential, employment, social and community facilities in close proximity to each other;
- (iv) To support national investment in public transport services to achieve the better integration of land uses and high-quality public transport provision and to reduce car dependency throughout the county;
- (v) To achieve a quantum of services and infrastructure in all settlements to match existing and future population demands;
- (vi) To promote economic development and employment opportunities within defined Strategic Employment Development Areas in the North-West corridor of the Metropolitan Area, in line with the overall Growth Strategy;
- (vii) To recognise the role of the rural countryside in supporting the rural economy and its role as a key resource for agriculture, equine, bloodstock, forestry, energy production, tourism, recreation, mineral extraction and rural based enterprises;

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<sup>1</sup> *Development Plans Guidelines for Planning Authorities* (2007), Section 4.14 requires that any development plan or local area plan zone sufficient land for residential development to meet the population projection for the six year plan period, plus an additional three years (or an additional 50% population growth):

*"Planning authorities should take all reasonable steps to ensure that sufficient zoned residential land is available throughout the lifetime of the development plan and beyond to meet anticipated needs and allow for an element of choice. In particular, to ensure continuity of supply of zoned residential land, planning authorities should ensure that at the time they make a development plan, enough land will be available to meet residential needs for the next nine years. In this way, development plans will provide for sufficient zoned land to meet not just the expected demand arising within the development plan period of six years, but will also provide for the equivalent of 3 years demand beyond the date on which the current plan ceases to have effect."*

(viii) To support, facilitate and promote the sustainable development of renewable energy sources in the county;

(ix) To protect local assets by preserving the quality of the landscape, open space, recreational resources, natural, architectural, archaeological and cultural heritage and the material assets of the county;

(x) To promote social inclusion and facilitating the delivery of objectives contained in the Kildare Local Economic and Community Plan (LECP) 2016- 2021 and any succeeding Plan.

These overall aims are supported by our client and we request, as the Council are obliged to do, that they permeate into the formulation of the new Newbridge Local Area Plan.

The Kildare Core Strategy and Settlement Strategy is set out in Chapter 2.1 of the emerging plan where it is stated that the Overall Aim for the county is *'To provide for the delivery of an additional 9,144 housing units to accommodate an additional 25,146 people by the end of the Plan period, through the delivery of sustainable, compact settlements supported by a commensurate level of physical and social infrastructure to mitigate against climate change.'* This is a set of principles and aims that our client wholeheartedly endorses.

Newbridge is identified in the settlement hierarchy as a defined 'Self-Sustaining Growth Town' along with Leixlip, Kildare Town, and Athy where a moderate supply of jobs and services will be provided to go with what is a relatively modest growth in homes for the town.

Section 2.5 of the emerging County Plan sets out how the Core Strategy has been devised. It is generated by consideration of a number of factors including the following:

- Trends in population;
- Population projections for Kildare County;
- Evaluation of Housing demand; and
- Housing targets.

In each of these, Newbridge has performed well. For example, it is the largest town in the county, has strongest growth rates under item 1 above and is projected to grow further as a significant number of residential units come on-stream. There is also significant housing demand and this is clear from the County's Housing Need Demand Assessment which demonstrates a particularly acute demand for social housing. The only potential constraint previously identified to further zoning in the county is adequacy of infrastructure but we are aware that the capacity of Osberstown Waste Water Treatment Plant has been substantially increased and which has occurred since the adoption of the current Newbridge LAP in 2013.

Section 2.5.1 of the Draft County Plan indicates the county's strong performance in terms of population growth (ie) the fifth highest population in the State. Over a 20-year period (1996 to 2016), Kildare experienced a 64.8% (+87,512) increase in its population base, the second highest rate in the State. The growth rate from 2006 to 2016 of 19.4% is the fourth highest in the State. Within those figures, Newbridge is a leading performer within the county as identified above. County housing vacancy rates are considerably below the State average and construction of new houses in the county was seventh amongst all local authorities with Newbridge again figuring prominently in those key performance indicators. The high construction levels are set out below for the town and all of the above barometers of growth and demand would indicate a more substantial level of growth being allocated to Newbridge than is currently anticipated to be the case as stated in the emerging County Plan.



The above figures for Kildare provide for a population range for the period to 2026 and onwards to 2031. Taking the higher range for each growth band, the county population is projected to increase by 31,500 persons to 2026 with an additional 12,500 to the year 2031.

The County Council are acutely aware that they are directed by the Department of Housing, Local Government and Heritage following issuance of the 'Housing Supply Target Methodology for Development Planning' (December, 2020). Appendix 1 of the aforementioned document identified a total housing demand of 18,425 for County Kildare over the period 2020-2031 (see Table 2.3 below) as set out in Section 2.5.4 of the emerging plan.

Table 2.4 sets out the calculation of the housing target as 9,144 units for the County to the end of the emerging plan period.

In setting out this target the County Council acknowledges the need for compact growth as set out in Section 2.6 of the emerging plan. The intention in allocating the above target is to follow the principles of connected neighbourhoods and the 10 minute concept within urban settlements. The aim is to create integrated communities that provide high quality environments and provide local shops and services, amenity areas, places of employment – all the features that are already available close to the subject site and which are identified below. The rezoning of the subject site should also be consistent with the principles identified in Section 2.7 (Town and Village renewal) and the NPF, RSES including MASP and the Specific Planning Policy Requirements (SPPRs) of any relevant Ministerial Guidelines under Section 28 of the Planning and Development Act 2000 (as amended). These advocate the following which our client wholeheartedly endorses in the context of the subject site and the emerging County Plan:

*'a compact growth philosophy to the existing urban footprint of settlements in the county through the consolidation within the existing urban footprint, by ensuring 30% of all new homes are targeted within the existing built-up areas, in line with the NPF National Strategic Outcome. This means that the extent of zonings on peripheral greenfield development sites will need to be critically evaluated with regard to their compatibility with the renewal and regeneration targets set out in the NPF.'*

Our client supports this important compact growth philosophy that will govern issues of zoning in LAPs, including for Newbridge, in due course.

Our client also supports the tiered approach to land use zoning set out in Section 2.8.1 of the emerging plan.

We note that Volume 2 contains Infrastructural Assessments for lower order settlements and that *'Individual Local Area Plans will be prepared for higher order settlements, where individual Infrastructural Assessments will be carried out to apply the tiered approach to the zoning provisions associated with their respective housing allocations.'* We understand the Council's position on this. However, we would suggest that as infrastructure is linked within the county to all settlements and that infrastructure has to some large degree determined the allocation of growth within the settlement strategy within the emerging plan, and will determine the sites to be zoned within the LAPs in due course, we request that some assessment or key findings be contained within the emerging county plan in Volume 2. Otherwise, one will have to wait until the draft LAPs are produced before knowing the Council's position on infrastructure for the higher order settlements. As indicated above we have seen reference to infrastructural constraints in regard to Newbridge and it would be for the emerging county plan to set out at least what strategic infrastructural constraints, if any, are at play.

In respect of density our client supports the first paragraph of Section 2.10 (Target Residential density) which states that *'The Sustainable Residential Development Guidelines encourage net densities of between 35-50 dwellings per hectare within larger towns with net densities of between 30-35 dwellings per hectare considered acceptable in certain large town contexts and net densities of less than 30 dwellings per hectare.'*

The emerging plan applies that density range to each of the settlements culminating in the housing unit targets allocated to each of the towns including Newbridge. Table 2.8 of the emerging County Plan is partially reproduced below as Table 1.

From Table 1 it is clear that Newbridge is the most populated town in the county, is projected to have the largest population as an estimate for 2021 in the absence of a census of population being taken that year. However, Naas is allocated the largest housing and population target at 14.9% as opposed to the 11.6% of the county's population growth allocated to Newbridge.

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

Settlement Type	Settlement Name	Census 2016 Population	Settlements percentage per total County population	2021 Population Estimate (based on % growth from 2011-2016)	Housing & Population Target %	Population Target 2023 to 2028 (end of Q4) (persons)	Housing Target 2023 to 2028 (end of Q4) (units) in accordance with HSTGs	Residential Zoned Land Requirement (ha)	Target Residential Density (UPH)
County	Kildare	222,504		235,387		260,533	9,144		
Key Town	Naas	21,393	9.60%	22,632	14.9%	3,747	1,362	40	35-50
	Maynooth (MASP)	14,585	6.60%	15,429	10.90%	2,741	997 <sup>a</sup>		35-50
Self-Sustaining Growth Towns	Newbridge	22,742	10.20%	24,059	11.60%	2,917	1,061	35	35-50
	Leixlip	15,504	7%	16,402	10.20%	2,565	933	31	35-50
	Kildare Town	8,634	3.90%	9,134	4.70%	1,182	430	14	35-40
	Athy	9,677	4.30%	10,237	4.80%	1,207	439	15	35-40
Self-Sustaining Towns	Celbridge	20,288	9.10%	21,463	10.00%	2,515	914	30	35-40
	Kilcock	6,093	2.70%	6,446	4.00%	1,006	366	12	35-40
	Monasterevin	4,246	1.90%	4,492	2.60%	654	238	8	35-40
	Clane	7,280	3.27%	7,702	2.40%	604	219	7	35-40
Towns	Sallins	5,649	2.62%	6,188	1.90%	478	174	6	35-40
	Kilcullen	3,710	1.70%	3,925	2.50%	629	229	8	35-40
	Kill	3,348	1.50%	3,542	1.30%	327	119	4	35-40
	Prosperous	2,333	1.04%	2,468	1.00%	251	91	3	30-35
	Rathangan	2,611	1.20%	2,762	0.90%	226	82	3	30-35
	Castledermot	1,475	0.70%	1,560	0.50%	126	46	2	30-35
	Derrinturn	1,602	0.70%	1,695	0.60%	151	55	2	30-35

Pop Growth					25,145				
Total		222,504		235,387	260,533	9,144			

The allocation of growth to Naas is contrary to a number of facts and guidance directives including the location of Maynooth, Leixlip, Celbridge and Kilcock within the Metropolitan Area defined within the Metropolitan Area Strategic Plan (MASP) which forms part of the Eastern Midlands Regional Spatial and Economic Strategy 2019-2031. The identification of Naas and Maynooth are identified as the only settlements of regional status within the county.

Although somewhat short-changed in terms of population and housing targets Newbridge is effectively twinned with Naas in employment terms where they form part of the 'Naas to Newbridge Strategic Economic and Employment Zone'. The long-term vision for the area between Naas and Newbridge is for two dynamic and vibrant town centres linked by a strong economic corridor focused on the eastern side of the R445.

Employment and service growth is identified for both Naas and Newbridge including provision for a wide range of retail, commercial, leisure, social and cultural enterprises and civic amenities (civic squares/public realm interventions) to sustain a strong residential base that will be served by a future DART service (electrification of the rail line from Sallins to Newbridge). As indicated below the future growth of population and homes allocated for Newbridge in the emerging Core Strategy is somewhat underwhelming in light of the population growth experienced in the town over a sustained period, the take up of zoned land through the implementation of planning permissions and the completion of housing estates.

The following Core Strategy and Settlement Strategy policies and objectives are supported and our client looks forward to seeing these implemented in the formulation of the new Newbridge LAP.

*‘CSO 1.4 Ensure that sufficient zoned and adequately serviced lands are available to meet the planned population and housing growth of settlements throughout the county in line with the Core Strategy and the Settlement Hierarchy.*

*CSO 1.5 Promote compact growth and the renewal of towns and villages through the development of underutilised town centres and brownfield sites, maintaining a ‘live’ baseline dataset and to monitor the delivery of population growth on existing zoned and serviced lands to achieve the sustainable compact growth targets of 30% of all new housing within the existing urban footprint of settlements.*

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

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

*CSO 1.9 Review and prepare on an ongoing basis a portfolio of Local Area Plans (LAPs) for the mandatory LAP settlements of Naas, Maynooth, Newbridge, Leixlip, Kildare, Athy, Celbridge, Kilcock, Monasterevin, Sallins, in accordance with the objectives of the County Development Plan and all relevant Section 28 Ministerial Guidelines.*

*CSO 1.18 To consider aligning the Kildare County Development Plan 2023-2029, with the up-to-date population from the forthcoming Census, where there are verified material population differentials to those in Table 2.8 of the Plan, by way of a statutory variation pursuant to Section 13 of the Planning and Development Act 2000 (as amended).’*

### *Housing*

Chapter 2 of the emerging plan sets out the County Council policies and objectives for housing. That chapter aims to secure the provision of homes tailored to the needs of the existing and projected population. It is noted that the Housing strategy set out in Section 3.2 states that a key aim of the Housing Strategy is to provide for the right quantity of appropriate housing in the right locations that are accessible and affordable for all residents of the county through the implementation and delivery of the Housing Strategy and Housing Need & Demand Assessment (HNDA).

Chapter 2 states that the NPF acknowledges that the physical format of urban development is one of our greatest national development challenges and identifies compact growth as one of the National Strategic Outcomes. This entails delivering a greater proportion of residential development within existing built-up areas of settlements and moving away from a reliance on greenfield development to meet our development needs.

Within Section 3.6 (Housing Supply) of the emerging plan it is recognised that approximately 9,144 housing units are identified for the county to the end of 2028 and that growth is *‘directed based on the status of the town or settlement within the settlement hierarchy and the capacity of physical and social infrastructure and the environment to accommodate growth. The Plan will support consolidation through infill development and the redevelopment of areas that are in need of renewal and the sustainable extension of established urban areas.’* Our client looks forward to this being carried



forward into the formulation of the forthcoming Newbridge LAP. Our client similarly supports emerging policy HO P4 which states:

*'HO P4 Ensure that sufficient zoned land continues to be available at appropriate locations to fulfil the housing requirements of the county.'*

The following objective is also supported by our client who also looks forward to this objective being implemented at the Newbridge LAP stage.

*'HO O2 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.'*

In regard to densities, Table 3.1 of the emerging plan is excerpted below as Table 2 in respect to densities.

**Table 2:** *Appropriate density levels as per the Sustainable Residential Development in Urban Areas - Guidelines for Planning Authorities, DEHLG (2009) excerpted from Table 3.1 of the Draft County Development Plan*

Category	Location for New Residential Development	General Density Parameters (Units per Hectare)
Larger Towns (Population > 5,000)	Town Centre & Brownfield Sites	Site Specific
	Public Transport Corridors	50 units per ha
	Inner suburban/infill	Site Specific
	Institutional Lands	35-50 units per ha
	Outer Suburban /'Greenfield'	30-50 units per ha

The 'Sustainable Residential Development in Urban Areas' - Guidelines for Planning Authorities' (2009) state that the greatest efficiency in land usage on Outer Suburban / 'Greenfield' sites in Larger Towns will be achieved by providing net residential densities in the general range of 35-50 dwellings per hectare.

The principle of compact growth is promoted in Section 3.9 (Regeneration, Compact growth and Intensification). It is stated that *'It will be necessary to make the best possible use of under-utilised land and buildings, including 'infill', 'brownfield' and publicly owned sites and vacant and under-occupied buildings, with higher housing and jobs densities, serviced by existing and proposed facilities and public transport. The existing housing stock of County Kildare provides a valuable resource in terms of meeting the needs of a growing population and its retention and management is of considerable importance.'*

The following policy is supported by our client:

*'HO P6 Promote and support residential consolidation and sustainable intensification and regeneration through the consideration of applications for infill development, backland development, re-use/adaptation of existing housing stock and the use of upper floors, subject to the provision of good quality accommodation.'*

The following housing objective is supported:

*‘HO O9 Support new housing provision over the Plan period to deliver compact and sustainable growth in the towns and villages in the County, and supporting urban renewal, infill and brownfield site development and regeneration, to strengthen the roles and viability of the towns and villages, including the requirement that at least 30% of all new homes in settlements be delivered within the existing built-up footprint.’*

### ***Project Ireland 2040: National Planning Framework and National Development Plan***

One of the ten priorities within the NPF, identified as National Strategic Outcomes, and possibly the most important, is the provision of ‘compact growth’. In the context of Newbridge, where the population and household targets contained in the 2017 County Development Plan have been revised downwards and effectively pushed outwards from 2023 to 2031, it is important that future residential development within all settlements including Newbridge follows this basic concept of compact growth even in circumstances where land has to be dezoned under Section 10 of the Planning and Development Act 2000, as amended. Such dezoning should be facilitated where existing zoned sites have not come forward for development over several plan periods and where unzoned sites, such as our clients, more closely align with the sequential approach and the concept of compact urban form.

The NPF has a number of implications for County Kildare in relation to planning, housing and infrastructure policy development (i.e. the requirement to review County Development Plans, produce Infrastructure Assessments and Housing Needs Demand Assessments respectively) to ensure that policy and zoning decisions are evidentially based.

### ***EMRA Regional Spatial and Economic Strategy (RSES)***

The impact of the EMRA RSES is significant for the County as this not only sets out planning guidance but sets the population target for the County going forward. The RSES is now a major driver in determining future housing provision and effectively acts as a link between national guidance (the NPF) and local statutory plans and more clearly determine the latter. The emerging County Development Plan has to be in accordance with the EMRA RSES, the implications of which are set out below.

The Two Year Progress Report of the existing adopted County Development Plan (CDP) dated May 2019 recognised that *‘the NPF and RSES project slower rates of growth for County Kildare than the County Development Plan’*.

### ***Section 28 Guidance: Ministerial Guidelines on ‘Housing Supply Target Methodology for Development Planning’ (2020)***

These Guidelines, adopted as recently as December 2020, aim to assist local authorities in appropriately integrating the strategic national and regional population and housing projections into their statutory functions, to inform the statutory plans process and to ultimately assist in decision making around the quantum of land to be zoned to meet housing need.

In terms of the amount of land to be zoned for residential purposes para 4.8 states:

*‘City and County development plans must therefore plan to provide housing to the extent identified in the established NPF Roadmap population projections for their local authority and accordingly in the NPF 50:50 City housing projection scenario, in core strategy, settlement strategy and associated identification of development potential and zoning exercises.’*

Para 4.4 of these guidelines state that local authorities should make sure that there is sufficient provision for the delivery of housing to meet identified demand, having regard to the availability of services, the rate of take-up of development land (brownfield/infill and greenfield) and the pattern of housing completion, including rural housing, where applicable. While extant planning permissions must be taken into consideration, a realistic assessment of the likelihood of implementation must also be made, having regard to the remaining duration of such permissions, as well as recent rates of delivery and market absorption by development type.

Para 4.5 of the same document states that planning authorities must provide for housing in their development plan that is consistent with national and regional planning objectives, including the achievement of compact growth and the consolidation of towns and cities, in order to move away from a development pattern characterised by dispersed sprawl and unsustainable levels of long-distance commuting.

Para 4.7 states that planning to accommodate additional household demand must be clearly quantified and must be:

- i) Consistent with the National Planning Framework and relevant Regional Spatial and Economic Strategy in terms of the settlement hierarchy, i.e. located in cities, regional growth centres, key towns, and other sustainable urban centres;
- ii) Consistent with the NPF National Strategy outcomes to achieve compact growth, sustainable mobility and transition to a low carbon society;
- iii) Consistent with the relevant metropolitan area transport strategy, where applicable, and capable of delivering public and active transport mode choice upon occupation;
- iv) Capable of being serviced by physical and social infrastructure such as water services, schools and public amenities and recreational facilities and energy and communications networks within the plan period.

The above Ministerial Guidelines were accompanied by a Letter dated 18<sup>th</sup> December 2020 from the Minister for Housing Local Government and Heritage entitled '*Structural Housing Demand in Ireland and Housing Supply Target*'. The letter sets out in very stark terms, particularly in the current housing crisis and the unfolding Covid 19 pandemic, that the number of housing completions will have to be substantially increased over the figures identified in the NPF and associated models.

The letter indicates that the 31,000 target for completions in the NPF projections up to 2040 must be raised to 33,000 over a shorter period of time (i.e. to 2031 meaning halving the period of time originally envisaged and increasing the target over that shorter period of time) to meet need.

The letter further states:

*'there is a more pressing need to increase national housing supply to meet existing, unmet housing demand, to the greatest extent possible in the shortest time possible, while also accommodating projected national housing demand. Factoring in existing demand together with future projected demand, will require annual average national demand for just over 33,000 new households per annum, to be met during the period 2020 to 2031.'*

We believe that the emerging County Plan should have in place revised targets for Newbridge reflective of its recent history and ability in delivering much needed homes. In addition to the above the letter states that:

*'As well as targeting an increase in national housing output to at least 33,000 new homes per annum by 2025, this will mean meeting the housing needs of more than 350,000 new households by 2030. It is critical to ensure that in meeting this challenge, the new homes to be built over the next decade are located where housing demand is greatest and where there*

*is good accessibility to employment, education, public transport, and other services and amenities.'*

It is clear from the above that new homes over the next decade need to be located where housing demand is greatest and where there is good accessibility to employment, education, public transport, and other services and amenities. It should be noted that there are existing zonings co-terminus with the subject site that will facilitate those land uses, amenities and activities that will support residential development.

It is further stated in the letter that *'In the context of increasing housing supply, the importance of an early period of accelerated growth is highlighted in the NPF. In particular, the section on 'Housing Demand' (page 94) envisages an increase in new housing output to up to 35,000 homes per annum in the years to 2027, to address the deficit that had built up in the preceding years, and that this would be subject to monitoring and review.'* In the next sentence of the same letter, however, it is acknowledged that *'Since the NPF was published in 2018, there have been three further years where supply has been constrained relative to demand, exacerbated by the setback arising from the Covid-19 pandemic.'* It is therefore stated that:

*'In acceptance of the difficulty in meeting revised housing completion rates and in particular in the short term (i.e. to 2026) The Minister's Letter states the following: 'In the same way that it will take several years to converge towards targeted annual average housing output nationally, at individual local authority level, convergence with targeted annual average housing output will also occur over time. It is therefore envisaged that in some local authority areas, and in particular where recent levels of annual average housing supply already exceed annual average NPF targets, such output may, in justified circumstances and within specified limitations, be considered in the years to 2026, in the overall context of convergence with NPF scenario housing projections to 2031.*

*Justified circumstances are that provision for such development would be sustainable i.e. serviced and public transport-accessible, and subject to limitations that such provision would not exceed the mid-point between the ESRI projected 'baseline' and NPF annual average housing demand scenarios applicable to 2026 plus up to 25%, also factoring in identified 'unmet' housing demand. This methodology is set out in the accompanying Section 28 Planning Guidelines Housing Supply Target Methodology for Development Planning.'*

In respect of the above and field research undertaken by the author (see Appendices A and B attached) we believe that a significant volume of housing is being provided within Newbridge and that the town will maintain its high level of population growth and that this should be considered in respect of the preceding quote from the Housing Supply Target Guidelines.

Appendix 1 to the Letter accompanying the Ministerial Guidelines applies the methodology of the guidelines into the practical experience for County Kildare. Table 7 below is a reproduction of the section in Appendix 1 that relates to County Kildare specifically.

**Table 7: Revised Housing Demand for Co. Kildare as per recent Ministerial Guidance on 'Housing Supply Target Methodology for Development Planning.'**

<b>Table 5: Kildare County Council</b>		<b>Annual Average</b>	<b>Total Households</b>
<b>A</b>	ESRI NPF scenario projected new household demand 2017 to 2031	1,483	22,238
<b>B</b>	Actual new housing supply 2017-19	1,368	4,104
<b>C</b>	Homeless households, and estimated unmet demand as at Census 2016	N/A	291
<b>D</b>	<b>Housing Demand 2020-31 =Total (A-B+C)/12</b>	<b>1,535</b>	<b>18,425</b>

The ramifications for Newbridge under the above proposed methodology are set out further below.

**Section 28 Guidance: Ministerial Guidelines for ‘Development Plans, Guidelines for Planning Authorities’ (2007)**

These guidelines state that in para 4.14 that:

*‘Planning authorities should take all reasonable steps to ensure that sufficient zoned residential land is available throughout the lifetime of the development plan and beyond to meet anticipated needs and allow for an element of choice. In particular, to ensure continuity of supply of zoned residential land, planning authorities should ensure that at the time they make a development plan, enough land will be available to meet residential needs for the next nine years. In this way, development plans will provide for sufficient zoned land to meet not just the expected demand arising within the development plan period of six years, but will also provide for the equivalent of 3 years demand beyond the date on which the current plan ceases to have effect.’*

In terms of preferred locations for future residential zonings the ‘sequential approach’ is advocated. The application of the sequential approach is set out in para 4.19 of these guidelines which states:

*‘In order to maximise the utility of existing and future infrastructure provision and promote the achievement of sustainability, a logical sequential approach should be taken to the zoning of land for development:*

- (i) Zoning should extend outwards from the centre of an urban area, with undeveloped lands closest to the core and public transport routes being given preference (i.e. ‘leapfrogging’ to more remote areas should be avoided);*
- (ii) A strong emphasis should be placed on encouraging infill opportunities and better use of under-utilised lands; and*
- (iii) Areas to be zoned should be contiguous to existing zoned development lands.*

*Only in exceptional circumstances should the above principles be contravened, for example, where a barrier to development is involved such as a lake close to a town. Any exceptions must be clearly justified by local circumstances and such justification must be set out in the written statement of the development plan.’*

**Section 28 Guidance: Draft Ministerial Guidelines for ‘Development Plans, Guidelines for Planning Authorities’ (2021)**

These guidelines are not formally adopted but present the Government’s most up to date position on the formulation of statutory development plans including advice on Core Strategies, population growth, accommodation of housing targets and the process to be followed for considering the zoning of sites for residential and other purposes.

Section 1.3 sets out a renewed focus on more sustainable growth through compact urban settlements, supported by accessibility to transport, jobs, services and amenities which is considered is key to reducing greenhouse emissions, inefficient land and natural resource consumption and environmental degradation. It is recognised that the ‘translation of this compact growth agenda into the development plan is a key task for development plan preparation’.

Section 1.6 (Planning from an Evidence Base and Monitoring the Outcomes) stipulates that the process of preparing a county plan must be informed by local experience of planning over time. This means that the current plan-making exercise needs to be realistically informed by the delivery and outcome of previous plans and planning objectives for the area. It is also important to ensure that the impact of development plan policy and objectives can be measured and will be sufficiently tracked



into the future to inform policy choices applicable to subsequent plans'. In this regard we believe that the performance and whether zoned sites in the adopted Newbridge LAP should be considered in the formulation of the Draft County Plan and the growth allocated to the town. For that very reason we have undertaken an up to date analysis of the take up of permissions and the construction of housing on sites zoned for residential purposes within the 2013 adopted LAP.

That issue of the performance of previous plans including LAPs including within the context of a County Development Plan is addressed in Section 4.4.1 (Lands/Sites Already Zoned) of the Draft Development Plan Guidelines. The Guidelines state clearly that *'the development plan review process is an opportunity to take stock of land already zoned or residential purposes or a mixture of residential and other uses. This must be set out in the plan core strategy. It is critical to note that Section 10(8) of the Planning Act makes it clear that there is no presumption in law that land zoned for any purpose in a development plan shall remain so zoned in any subsequent development plan'*.

In regard to consideration of extant planning permission it is stated that: a site with a planning permission that has yet to commence may be regarded as having equivalent potential to any other zoned and serviced site for core strategy calculation purposes; and that a site with a planning permission that has commenced, should not be wholly excluded from core strategy calculation purposes unless almost fully built-out. A reasonable estimate should be made of housing delivery from the permission that is likely to occur during the plan period. This should be informed by recent levels of housing output and local market absorption rates on a whole settlement basis, also allowing for a progressive increase in output.

It is further stated that land and sites already zoned for residential purposes may be regarded as providing a baseline, or starting point to meet projected population and housing targets, especially in cases where planning permission has already been granted, based on the presumption that land subject to planning permission is already serviced or serviceable. It is further stated that should it be the case that there is a surplus of well-located zoned and fully serviced land to meet population and housing supply targets already zoned for development in any local authority area when reviewing a development plan, it is recommended that a phased approach be taken to prioritise and rank the preferred sequence of development of such sites. It is further stated that:

*'However, in cases where land is zoned and has remained undeveloped and unserviced through one or more development plan cycles, with no prospect of being serviced within the six-year life of the development plan that is under preparation, alternative approaches must be considered:- (i) alternative zoning objectives or (ii) discontinuing the objective.'*

Section 4.4.2 (Land/Sites Proposed to be Zoned) states that *'Estimating requirements for land and sites to be zoned for residential or a mixture of residential and other uses must follow on from an assessment of whether the amount of land already zoned is adequate to meet the housing needs of the area. The rate of take-up and build-out of such land over a preceding period of at least 6-10 years is an important consideration in this regard.'*

The Guidelines add further that:

*'Such analysis must also consider trends and projections in respect of rural housing output and infill development/building refurbishment, as well as whether land already zoned may be serviced or serviceable within the six-year life of the plan.'*

It is further noted that it is not the purpose of the planning system and the development plan process to facilitate the hoarding and speculation of serviced development land. However, it is recognised that there is a need for some degree of competition and choice in the residential development land market.

Crucially in the context of Newbridge it is stated that:

*‘ . . . in considering whether to zone additional new land and sites for residential (or a mixture of residential and other uses) to meet housing need, planning authorities must ensure that the development plan core strategy makes adequate provision for zoned and serviced sites that will come forward during the six-year life of the development plan, while also considering and factoring in the proportion of projected housing need to be met on unzoned land in rural areas.’*

In regard to the future zoning of land from targets set out in the Draft County Plan Section 4.4.3 (Ensuring Sufficient Provision of Housing Lands/Sites) states that:

*‘In making provision for housing within settlements in the core strategy of a development plan, in certain instances a planning authority may therefore provide zoned residential sites in addition to those required to meet the settlement housing supply target. This means that a planning authority, after identifying the site/land requirements to meet the housing supply target for that settlement, may also identify additional sites/lands to ensure sufficient choice for development potential is safeguarded.’*

We are concerned that where the local authority considers it necessary, and we are disappointed that this does not appear to be the case for Newbridge, that the planning authority may consider it appropriate to employ this mechanism for ‘*additional provision*’ of residential lands on a particular settlement ‘it must be clearly set out in the core strategy. We believe that Newbridge has merit in receiving additional provision without affecting the primacy of Naas and Maynooth in the county settlement hierarchy.

When considering the zoning plight of Newbridge we would refer the local planning authority to the following as outlined in the draft guidelines that:

- a) There is no automatic presumption of Additional Provision land or sites to meet housing supply targets in any development plan. The extent of any Additional Provision must be comprehensively identified, quantified and explained in the core strategy and shall not exceed 20-25% of the required quantum of zoned land and sites in settlements in any planning authority area as a whole, for any six-year plan period;
- b) Housing supply and population targets for the relevant six-year development plan period, and the location and level of servicing of lands already zoned for development. (in accordance with 4.4.1 and 4.4.2 of the same draft guidelines);
- c) The need to ensure a minimum of 30% of all new residential development in settlements outside cities and 50% in cities and their suburbs, must comprise brownfield or infill development within the boundary/built footprint of the existing built-up area;
- d) Any parts of strategic and sustainable development sites that will be phased and built out over a longer period than the six-year development plan (such as large-scale urban regeneration areas, transport-led development sites or SDZs) may be included over and above as Additional Provision lands (per section 4.4.4 of the same draft guidelines);
- e) Additional Provision must not comprise land and sites that are not serviced or serviceable within the six-year plan period (save for the exception of strategic and sustainable development sites in section 4.4.4 of the draft guidelines);
- f) The location of zoned lands and sites within the settlement must be consistent with sequential development patterns, town centre first principles, proximity to services and facilities and the need to reduce carbon emissions;
- g) Additional Provision must be phased in a clear sequence of priority to facilitate development management decisions and development monitoring by the planning authority and An Bord Pleanála;

h) Additional Provision must be compatible with the core strategy regarding the proportion of projected housing demand to be met on unzoned land in rural areas.

We would ask the County Council to exercise their discretion under the above guidance.

We have a concern at the distribution of population and housing targets to Newbridge. The draft guidelines indicate that the various settlements in the settlement hierarchy will require a rigorous, evidence-based assessment. In this regard the draft guidelines state that *'A comprehensive capacity audit of the land and sites with potential for development at a settlement level, is a prerequisite to inform the drafting of the settlement strategy. The planning authority will need a complete analysis of the capacity of each settlement to accommodate new development in terms of suitable lands and infrastructure within the plan period.'* This 'Settlement Capacity Audit' (SCA) exercise accords with Appendix 3 to the NPF, which distinguishes between lands that are 'Serviced' (Tier 1) and those that are 'Serviceable' (Tier 2). This is to ensure that an informed decision can be made as to whether or not to zone land or sites in particular settlements for residential development and to inform the core strategy considerations.' Unfortunately, that assessment or SCA is not available for Newbridge, within the Draft County Plan including its appendices.

The Draft County Plan is quite threadbare in stating that recently experienced rates of growth in settlements will be an important consideration in formulating proposals for future growth designations and subsequent zoning. In Newbridge's case this has been greatly under considered.

The draft guidelines state that *'If projected growth assumptions are proposed that deviate significantly from historic trends, there should be a clear rationale and justification for this. The draft guidelines state that Some settlements, particularly in the environs of cities and metropolitan areas, have experienced very high levels of growth in recent decades. The extent to which there are infrastructural deficits in such settlements, such as in relation to water services, transport, schools and community facilities, should be a key factor when considering additional population/housing growth. It may be appropriate to moderate growth targets in such cases.'* Such constraints do not exist in Newbridge.

Section 6.2.1 of the draft guidelines state that in generating a core strategy, of which Table 2.8 of the Draft Plan is part, the local authority are required to apply housing 'targets' to settlements only where a detailed analysis of the housing delivery potential of those settlements has been undertaken and can inform such an approach. It is stated that: *'This is to ensure alignment between the intended strategic locations for development and an understanding of the capacity of those locations to deliver such programmed development'*. Crucially, in the context of Newbridge, the draft guidelines state:

*'It is recommended that in most cases, that land-use zoning decisions should not be deferred to subsequent local area plan processes. This is to avoid a scenario whereby the development plan core strategy may be subject to challenge and effectively undermined in a separate statutory process.'*

It is stated that there are clear practical advantages to aligning the core strategy, settlement strategy and principal residential zoning functions in a single, integrated development plan process. However, in recognition of an LAP being in place over a number of previous plan cycles the following in our opinion should be carefully considered by the County Council consistent with the emerging guidance on development plans and local area plans:

- (i) Transparency and coherence in the decision-making process, with the full extent of residential zoning set out for the six-year period of the development plan;
- (ii) Ensuring certainty by avoiding a scenario whereby lands are not zoned or inappropriately zoned in separate statutory processes;

- (iii) Providing clarity, especially where there may be a risk due to the time delay in preparing a number of subsequent local area plans; Enabling planning authority resources to focus on plan implementation and monitoring;
- (iv) Enabling local area plan preparation to concentrate on detailed planning for layout, design, community facilities, transport, recreational amenities, etc. at a local level.

Accordingly, the guidelines advise that land-use zoning should principally be undertaken as part of the development plan process in tandem with the preparation of the directly-related core and settlement strategies, informed by a Settlement Capacity Audit. *We await to see the SCA and in the interests of transparency (see comments on this in the draft guidelines above) it should be presented as part of the Draft County Plan documents for public comment.*

We request that future consideration of land use zoning be conducted in accordance with the sequential approach outlined in Section 6.2.3 (Sequential Approach to Zoning for Residential Development) This sequential approach should reflect the compact growth, utilisation of existing infrastructure and town regeneration national policy objectives of the NPF, furthering developing the Tiered Approach. It is acknowledged that the spatial pattern of the growth of settlements, often along radial access routes, characterised by ribbon and low density development, has served to 'lock-in' extremely high levels of car dependence and render settlements too spread out and incoherent to comfortably get around on foot or by bicycle.

The draft guidelines seek to assist in changing this historic spatial growth pattern towards a more compact growth approach.

In conclusion on the emerging Development Plan Guidelines it should be noted that in Appendix 1 of that document states that *'all zoning decisions must be founded upon the merit of the lands in question within the contemporary strategic and statutory policy context and should not be disproportionately influenced by legacy zoning matters. Planning authorities are not obliged to carry forward legacy zonings simply on the basis that lands were zoned in a previous plan(s).'* In the context of LAPs following the adoption of the Draft County Plan we would ask that this is explicitly stated in the text. This will be important for prospective LAPs.

#### ***Our Client's Response to the Draft County Plan and Requested Amendments***

As we have previously stated in our client's submission on the County Plan 2023-2029 Issues Paper the 'narrative of the numbers' is that upon relatively recent Ministerial Guidance summarised above, the requirement for future residential zoning will be based upon some 18,425 new households required to 2031 for Kildare County as a whole (Table 2.3 of the Draft County Plan refers). This equates to some 2,137 new residential units being allocated to Newbridge up to 2031 as a 11.6% allocation of the whole county (i.e. over a 10 year horizon) or some 214 units per annum over that period for Newbridge.

As an initial point of reference, the 2,137 units that were required up to 2031 for Newbridge as set out in the NPF Roadmap compares very unfavourably with the 3,770 units identified in the CDP when it was adopted in 2017 and that were required up to 2023 for Newbridge despite the high rate of population growth, high rate of housing delivery etc. This means that the arithmetic target for Newbridge has been halved and the period for realisation of that greatly reduced target has nearly doubled, (i.e. half the target in the number of units required and the target date itself doubled).

As this reduced target (from adopted CDP to NPF derived) is over a ten year period the number of units to be required over the 6 year period of either the emerging CDP or the subsequent Newbridge LAP should be 1,284 units. However, Table 1 above (excerpted from Table 2.8 of the Draft County Plan), allocates a housing target of only 1,061 of the County's target of 9,144 (Table 2.4 of the Draft County Plan refers) over the same period. We cannot see how and why this target has reduced from

1,284 to 1,061. If anything, the housing target should be maximised/increased and it is surely unfair in the context of the demographics, growth and take up of permissions that the former target figure of 1,284 units is not at least maintained or even exceeded and that the current resting place with just 1,061 units is now proposed.

Whilst this submission is focused on the projections and the implications for future land use zonings in Newbridge generally, rather than the merits of our client's site for rezoning at this stage, we would point out that the revised forecasts should mean that the Council look at zonings afresh in each of the settlements within the county where planning permission is not extant.

Although the sequential approach to rezoning has been in place since the Ministerial Guidelines on Development Plans in 2007 it is only in recent times that the emphasis has been placed on more compact urban form, prioritisation of infill and brownfield development, utilisation of serviced sites, maximising the existence of public transport, availing of proximity of schools, amenities, shops and services and we would ask that these circumstances are prioritised in any future zonings going forward. Our client's site although unzoned compares favourably to zoned uncommitted sites in terms of these principles and priorities.

*Land Use Zoning Requirements for Newbridge in the Context of the Draft County Development Plan 2023-2029*

It is clear that based on revised and more recent population and land demand projections provided by the Minister and advocated in the NPF Roadmap that the requirements for lands to be zoned within the county will be dramatically reduced and that in certain instances there may even be a requirement for the de-zoning of lands for residential development. This may result in the County Council having to reappraise the likelihood of sites zoned over several plans coming forward within a reasonable period of time or ever coming forward against the potential of unzoned sites such as our client's that better meet the requirements of the sequential approach to zoning and the concept of compact growth brought more into focus than when the adopted LAP came into force in 2013.

It is of particular concern that such a likelihood may occur within Newbridge which is the second largest town in the County only after Naas in population terms and where significant population growth has occurred in the past. As indicated above Newbridge has a population of 22,742 as of the last census, and is designated as a Self-Sustaining Growth Town. Its population is significantly higher than the other settlements at that level of the settlement hierarchy including Leixlip, Kildare Town and Athy, and should be allowed to grow further to reach its potential. We note that the ultimate aim is to grow Naas to 50,000 and Newbridge to 30,000 and this can only be achieved if further land use zoning occurs in the latter. Growth should not be encouraged in other towns and smaller settlements at the expense of Newbridge given its growth and performance.

Any potential opportunity for a 25% uplift advocated in the Ministerial Guidelines, and referred to above, should be utilised at the top end of the settlement hierarchy including Newbridge where more compact and sustainable urban growth can be achieved consistent with best planning practice and recent national planning advice.

Residential opportunities should be availed of where zoned open space (Zoning Objective F); community and education (Zoning Objective E); and neighbourhood centre (Zoning Objective D) are all located within convenient walking distance as in the case of Kellsborough House. We believe encouragement should be given to zoning sites that meet the sequential approach advocated in para 4.19 of the Ministerial Guidelines on Development Plans and also the following paras of the Ministerial Guidelines on 'Housing Supply Target Methodology for Development Planning' (2020) namely 4.5 (achievement of compact growth and consolidation of towns); para 4.6 (necessary support services and infrastructure for a new community and public transport accessibility); and para 4.7 (physical and social infrastructure such as water services, schools and public amenities, and recreational facilities and energy and communications networks). Any proposed zoning should also be



cognisant of the '10 Minute City' for towns, as well as cities, whereby a range of uses for sustainable living are located within 10 minutes walking or cycling of proposed residential neighbourhoods.

*The Residential Zoning and Delivery of Houses in Newbridge*

There are 20 sites zoned residential in the 2013 Newbridge LAP which has been extended to the end of 2022 and which is likely to run into its 10<sup>th</sup> year as the statutory plan for the town. The location of those 20 residentially zoned sites is shown in Figure 1 below along with their planning status as of 20<sup>th</sup> May 2022.

**Figure 1:** Newbridge LAP Zoned Sites and their Planning Status



The subject site for which a zoning submission will be made during consultation on the Draft Newbridge LAP is outlined in red. Of the 20 adopted LAP zoned sites some 9 no. are either completed or under construction and in some cases nearing completion. These are site nos. C2, C4, C6, C7, C10, C15, C16, C18 and C19 and are identified in white in Figure 1. There are 4 no sites in grey that are committed in terms of having extant planning permission (Sites C1, C5, C8 and C9). There are a further 2 no. sites that are subject of a current SHD planning application (Sites C12 and C13) and these are shown in yellow. There are finally 5 no. sites (C3, C11, C14, C17 and C20) that are in orange which are uncommitted – in each case no planning application has ever been lodged and consequently no permission ever received. This practice is aware that these sites have been zoned at least over the current adopted plan (ie since 2013 nearly 10 years ago) and we believe the previous statutory plan for the town.

The planning status and the planning application history of these sites, and their actual or realised development yield is shown in Appendix A to this submission with the same colour code applied (ie uncommitted sites C3, C11, C14, C17 and C20 are shown in orange).

The development status of each of the 20 existing zoned residential sites is shown in Appendix B.

As indicated in the last line of Appendix B there are some 2,424 units built or permitted. There is a potential yield of 1,325 units based on a density of 35 unit per hectare on uncommitted sites. There is also a potential yield from uncommitted, current planning application and built or under construction units amounting to some 3,178 units. This already exceeds the potential yield of the 2013 LAP sites which we estimate at 3,010 units meaning that so far there has been a net gain of 168 units from that which could have reasonably been estimated accruing from the 2013 LAP. The issue for our client is that the emerging County Plan housing target of 1,061 units is already exceeded by the uncommitted sites on their own potentially as we have identified above and in Appendices A and B. If those sites are brought forward they will either exceed that target or at least some of those sites will have to be dezoned to enable the emerging plan target to be met, if the target is not increased. We would suggest that the target is increased as indicated above due to the growth in the town, the construction rate in the town and the fact that the adopted plan is nearly 10 years old with the prospect that any new LAP will not be adopted until 2024 at the earliest and would therefore be statutorily obliged to run to 2030. We would expect that growth calculated on an annual basis would be increased for the LAP accordingly.

It is clear from Figure 1 and Appendix B above that three of the uncommitted sites (C14, C17 and C20) can be considered urban expansion sites rather than our client's sequentially preferred site at Kellsborough which can be classified as being 'infill' being surrounded on three of its four sides by existing development and its fourth side being enclosed within lands currently zoned in the existing LAP as industry and warehousing (Zoning Objective H of the adopted LAP) and being located closer to the town centre.

### **Conclusions**

We thank you for the opportunity to comment on the Kildare Draft County Development Plan 2023-2029.

Newbridge is clearly an attractive and active location for housing development and we would request that this is acknowledged in an increased housing allocation for the town in times of great housing need which would ultimately be reflected in the zonings and provisions of the Newbridge LAP.

We would also request that any new zoning prioritises infill opportunities well located to existing and planned services and public transport and where opportunities for compact growth can be maximised.

Yours sincerely,



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Director

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