

CWPA

Planning & Architecture

Unit 10 North Street Business
Park,
Seatown West,
Swords, Co. Dublin, K67C992
Phone: 01-6856616
email: info@cwpa.ie
web: www.cwpa.ie



Director of Planning,
Planning & Strategic Development,
Kildare County Council,
Devoy Park,
Naas, Co. Kildare,
W91 X77F

Date:

RE: **Stage Two Submission to the Draft Kildare Development Plan 2023 - 2029**

Dear Sir/Madam

CWPA Planning & Architecture, North Street Business Park, Seatown West, Swords, Co. Dublin, K67 C992, have been retained by our Client, Curragh Property [REDACTED], Ireland, to prepare and submit this Rezoning Submission for Stage Two of the Draft Kildare Development Plan 2023 – 2029, for the consideration of Kildare County Council.

Please find enclosed a copy of our Rezoning Submission relating to lands at Naas Road, Kilcullen, Co. Kildare. This submission sets out the planning rationale and justification for the proposed rezoning **from H: Industrial to C: New Residential** with the Specific Objective to ***“To provide independent living and care for the older person”*** and demonstrates how it will accord with the proper planning and sustainable development of the area. This submission is being made within the appropriate timeline for submissions 24th May 2022.

We, CWPA respectfully request that Kildare County Council consider the grounds of the enclosed submission during the preparation of the Kildare Development Plan 2023 – 2029 and we look forward to the publication of the Development Plan in due course.

Yours Sincerely,

Director of Planning

Joseph Corr MSc MRPII MIPI

| **May 2022**

Prepared by CWPA Planning & Architecture

DEVELOPMENT PLAN SUBMISSION

Kilcullen, Co. Kildare

Draft Kildare Development Plan 2023 - 2029 (Stage 2)

Submission made to Kildare County Council on behalf of Curragh Property DAC

CWPA
Planning & Architecture

Unit 10, North Street Business Park. Seatown West, Swords Co. Dublin, K67 C992.
Email : info@cwpa.ie
Phone : 01- 6856616



Executive Summary

- CWPA Planning and Architecture have been retained by Curragh Property DAC to prepare this rezoning submission which is being submitted within the Stage 2 Consultation Period of the Draft Kildare County Development Plan 2023 – 2029.
- The site to which this rezoning submission relates is located on lands at Naas Road, Kilcullen, Co Kildare. The site extends to c.1.84 hectares, is currently undeveloped and zoned **"H" Industrial and Warehouse**.
- The purpose of this submission is to change the zoning objective of the subject site from **"H" Industry and Warehouse** to **"C" New Residential** with the Specific Objective to ***"To provide independent living and care for the older person"***.
- This is to support the new draft development plan's approach in providing appropriate housing options for older persons since at the time writing there is no nursing home or age friendly living accommodation provided in the town of Kilcullen and its environs. This represents a deficit in health care and community services infrastructure provision for Kildare's older persons, as well as a lack of capacity to meet the housing needs of older community members who may no longer be able to live independently.
- The proposed rezoning, would facilitate a safe and secure residential environment, and would provide a strong sense of assurance and security to family members of elderly residents, including sons and daughters.

Quality Assurance – Mandate Stature

This document has been prepared and scrutinized in accordance with CWPA Planning & Architecture Quality Assurance team provisions.

Date of Preparation	Prepared By	Checked By	Approved By
May, 2022	Vikram Roy	Mark Whelan	Fran Whelan

CWPA Ltd. DISCLAIMER. 2022

This report has been prepared by CWPA Planning and Architecture, with all reasonable skill, care and diligence within the terms of the contract with the Client, incorporation of our General Terms and Condition of Business and taking account of the resources devoted to us by agreement with the Client. We disclaim any responsibility to the Client and others in respect of any matters outside the scope of the above. This report is confidential to the Client, and we accept no responsibility of whatsoever nature to third parties to whom this report, or any part thereof, is made known. Any such party relies on the report at its own risk

Table Of Contents

1.0 Introduction	4
2.0 Planning Legislation	4
3.0 Site Location and Description	5
4.0 Rezoning Submission	8
4.1 Existing Zoning	9
4.2 Proposed Rezoning	11
5.0 Relevant Frameworks,Guidance,Plans and Policy	13
5.1 National Planning Framework	13
5.2 The Regional Spatial Economic Strategy : Eastern and Midlands Region	16
5.3 Section 28 Ministerial Guidelines	17
5.4 Age Friendly Ireland – 10 Years Delivering for Ireland A decade of Progress	18
5.5 Kildare Age Friendly Strategy – 2019-2021	18
5.6 National Launch of Age Friendly Ireland’s Suite of Age Friendly Housing Resources & The agefriendlyhomes.ie Website	19
5.7 Housing Options for Ageing Population	20
5.8 The Housing Agency-Thinking Ahead	21
5.9 SAGE – Responding to the Support & Care of our Older Population	22
6.0 Rationale	24
7.0 Proposed Rezoning	26

1.0 Introduction

CWPA Planning & Architecture have been retained by our Client, Curragh Property DAC, 51 Dawson Street, Dublin 2, D02 AN26, Ireland, to prepare this submission on the Draft Kildare County Development Plan 2023 – 2029 (Stage 2) to Kildare County Council (KCC).

The written submission is made in response to an invitation for comments from interested parties by Kildare County Council (KCC). The submission is being made within the specified 10-week timeframe for the public consultation period ending on 24th May 2022.

The Rezoning Submission sets out the planning rationale and justification to demonstrate how the proposed rezoning of the subject lands from ‘H’- Industry and Warehouse to ‘C’- New Residential. This document demonstrates how this proposed rezoning accords with the proper planning and sustainable development of the area.

2.0 Planning Legislation

According to Section 9 of the Planning and Development Act, 2000 subject to the requirements set out in Section 9, 10, 11 and 12 of the Act, States that a planning authority must adopt a new Development Plan every six years. The contents of the Development Plan are set out within Section 10 of the Planning and Development Act, 2000 (as amended). It must include a strategy for the proper planning and sustainable development of the area of the Development Plan and shall consist of a written statement and a plan or plans indicating the development objectives for the area in question. The process for the preparation of the Draft Development Plan is contained within Section 11 of the Planning and Development Act, 2000 (as amended) and the consultation process of the Draft Development Plan is contained within section 12 of the Planning and Development Act, 2000 (as amended), which states:

“12.— (1) Where the Draft Development Plan has been prepared in accordance with section 11, the planning authority shall within 2 weeks of the period referred to in section 11(5)(c)—

(a) send notice and a copy of the Draft Development Plan to the Minister, the Office of the Planning Regulator, the Board, the relevant regional assembly, the prescribed authorities and any local community development committee in the area, and

(b) publish notice of the preparation of the draft in one or more newspapers circulating in its area.

(2) A notice under subsection (1) shall state that—

(a) a copy of the draft may be inspected at a stated place or places and at stated times during a stated period of not less than 10 weeks (and the copy shall be kept available for inspection accordingly), and

(b) written submissions or observations with respect to the draft made to the planning authority within the stated period will be taken into consideration before the making of the plan.

This submission to the draft of the Development Plan is being made in accordance with Section **12(2)(b)** of the Planning and Development Act, 2000 (as amended) and is being submitted within the specified time frame (24th May 2022) as set out on the website of the Kildare Development Plan 2023-2029.

3.0 Site Location and Description

The subject site is located within the Northern portion of Kilcullen, a town in County Kildare. Kilcullen is easily accessible and is c. 0.3 Km from the R448 linking Kilcullen to Naas Town. Naas and Newbridge are designated ‘*Large Growth Towns*’ in the Draft Kildare Development Plan 2023-2029. Together with the advantage of an HSE Clinic in Kilcullen.



Figure 1: Subject Site location in Kilcullen town, Source: Google Earth



Figure 2: Subject Site location in Kilcullen, Source: Google Earth

The subject site is a greenfield site and is characterised by adjoining Existing Residential and Existing Commercial land uses. The subject site is directly adjoined by residential development to the north and an existing commercial and industrial premises consisting of a manufacturing warehouse to the south. Moreover, lands to the east are currently undeveloped whereas the Naas Road runs along the western boundary.

The Subject site which is located at Naas Road, Kilcullen is within reasonable walking distance of a host of services, facilities and amenities including Kilcullen Dental, Circle Express, Kilcullen Tennis Club, Eurospar & the garden shop. The Kilcullen neighbourhood town centre is also situated within 1 km of the site. Community Activity Infrastructure such as Kilcullen church of the Sacred Heart, Kilcullen GAA/AFC, Kilcullen Garda Station & Kilcullen Community Centre are all located within a 15 min walking radius of the site



Figure 3: Existing Residential Development near the Subject Site, Source: Google Earth

The subject site is located at Naas Road, Kilcullen is within reasonable walking distance of a host of services, facilities and amenities including

- Kilcullen Dental (1 minute Walk) • Circle Express (1 minute Walk).
- Kilcullen Tennis Club (4 minutes); • Bus Eireann Public Transport Services (8 minute walk).
- Kilcullen Main Street (shops, restaurants, cafés, banking, etc.) (8-minute walk);
- Kilcullen Farm and Nature Trail (11-minute walk); • Euro spar (12-minute walk);
- Kilcullen Church of Sacred Heart (14-minute walk); • Cross and Passion Secondary Collage (14 minute walk); • The Garden Shop (14 minute walk).
- Kilcullen Garda Station (15-minute walk); • Kilcullen Community Centre (18-minute walk); • Kilcullen GAA/ AFC (21-minute walk);



Figure 4: Subject Site Proximity Chart, Source : Author

4.0 Rezoning Submission

The planning submission proposes a change to the zoning objective of the subject site under the Draft Kildare County Development Plan 2023-2029. The forthcoming section sets out the rationale of changing the zoning objective of the subject lands from “H”-Industrial and warehousing to “C”- New Residential with a special objective to “*To provide independent living and care for the older person*”.

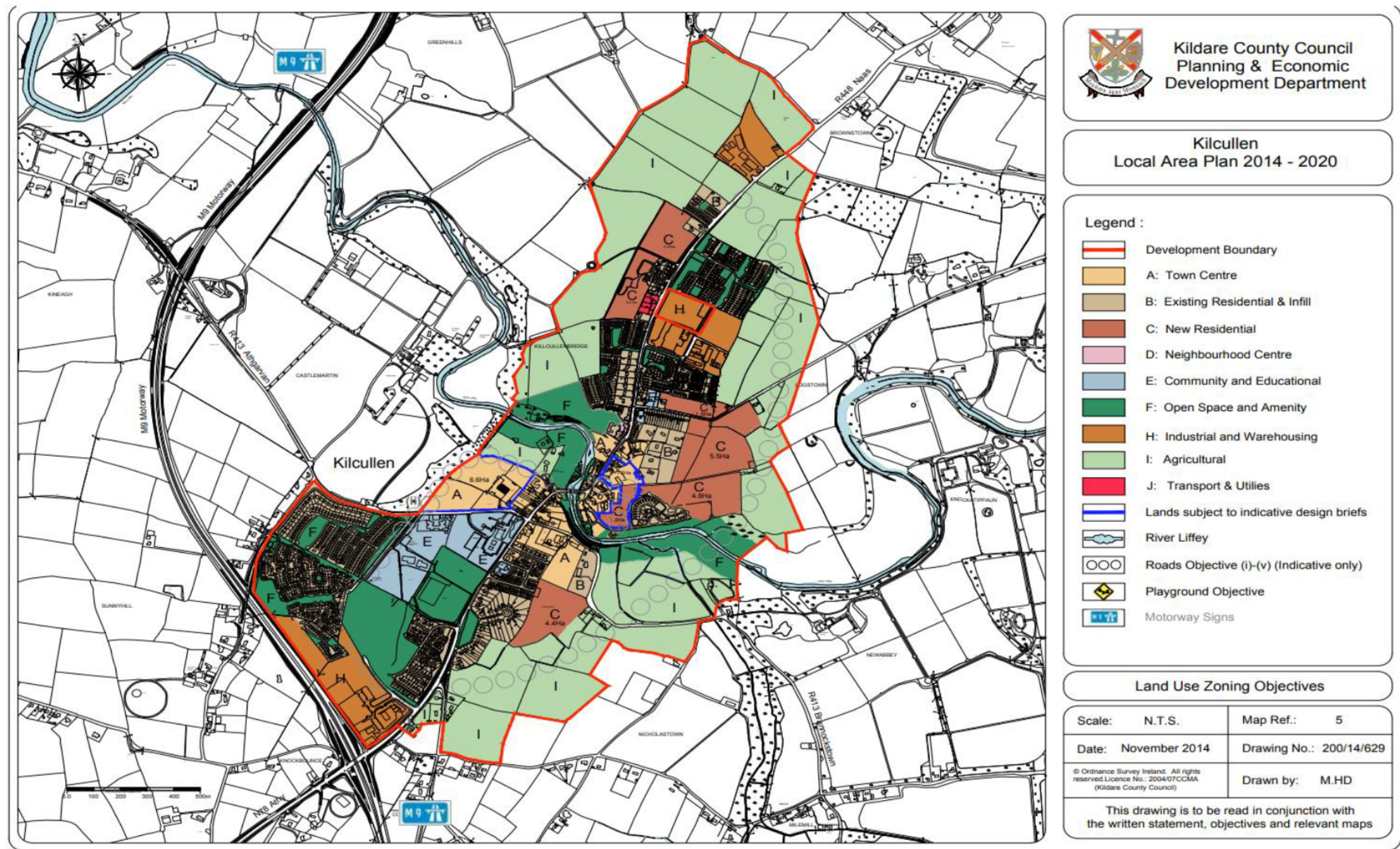


Figure 5: Red line boundary on Subject Site marked H from Land Use zoning objective, Source : Kildare Development Plan 2017-2023

4.1 Existing Zoning

The subject lands are zoned **Objective 'H' – Industrial and Warehousing** under the current Kildare County Development Plan 2017-2023.

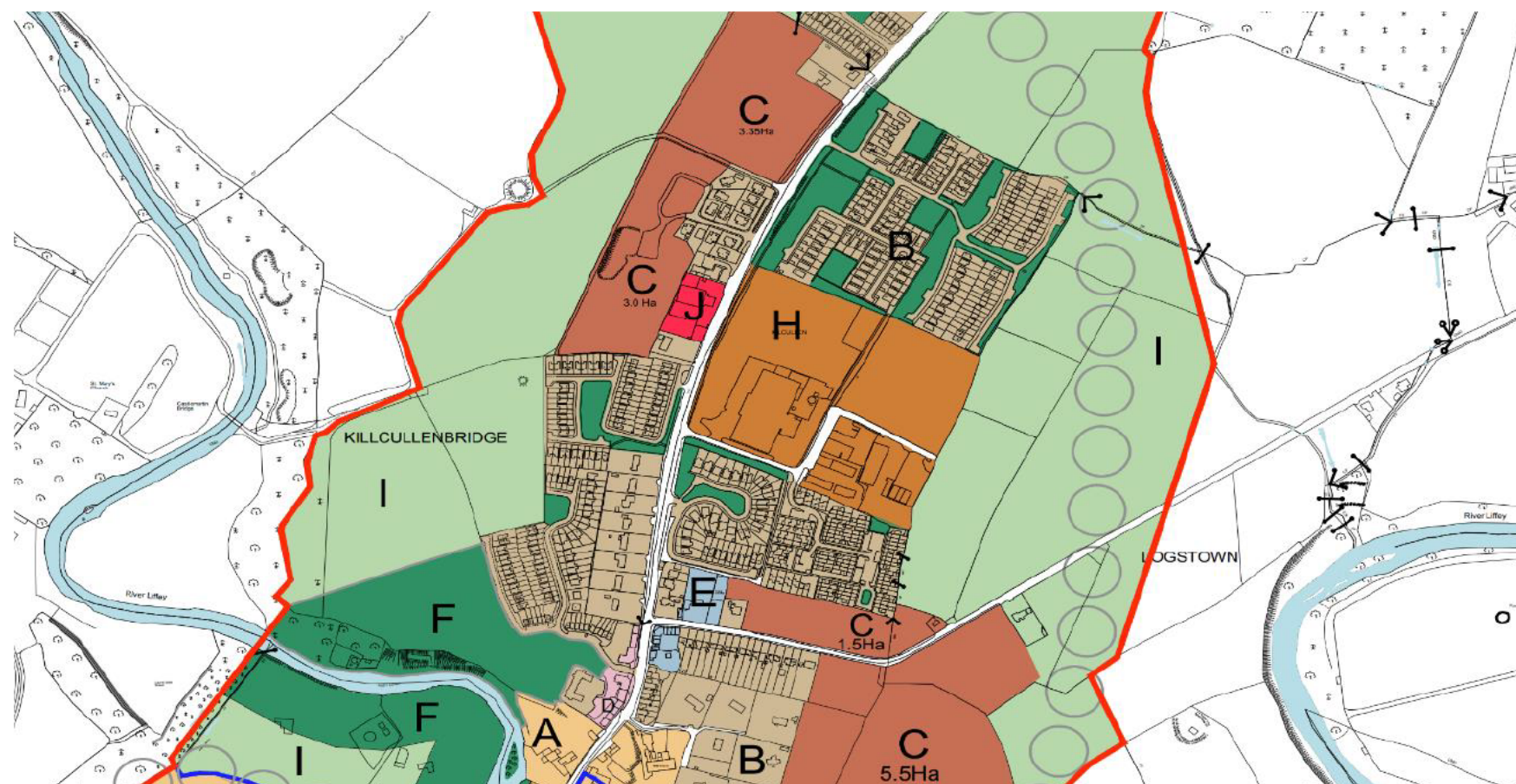


Figure 6: Current Land Use Zoning, Source : Kildare Development Plan 2017-2023

“H” - Industrial and Warehousing

The objective for this zone is to:

“To provide for and improve industrial and warehousing development.”

The Vision:

“The purpose of this zoning is to provide for industrial and warehousing uses. Other uses, ancillary or similar to industry and warehousing will be considered on the merits of the proposed development and may be acceptable in this zone. Where employment is a high generator of traffic, the location of new employment facilities at an appropriate scale, density, type and location will be encouraged to reduce demand for travel.”

The following use classes are **permitted** under this zoning objective :

Car Parks	Funeral Homes	Garage/ Car Repairs	Heavy Commercial Vehicle Parks
Industry	Industry Light	Motor Sales	Petrol Station
Repository, store, depot	Utility Structures	Warehouse(Wholesale)	Workshop

The following use classes are **open for consideration** under this zoning objective:

Community Hall	Childcare/Creche/Playschool	Halting Site	Health Centre / Clinic
Medical and Related consultancy	Offices	Park/Playground	Playing Fields
Recreational Buildings	Restaurant	Shop (Convenience)	Stable Yard

The following use classes are **not permitted** under this zoning objective :

Broiler House	Cattle shed/slatted unit	Cemetery	Cinema. Dance Hall, Disco
Cultural uses/library	Dwelling Unit	Guest House/Hotel	Waste Incinerator
Take Away	Nursing Home	Place of Worship	Pub
Residential	Retail Warehouse	School	Shop(Comparison)
Sport/Leisure Complex	Tourist camping site/Caravan Park		

4.2 Proposed Rezoning

The subject site is proposed to be zoned **Objective “C”- New Residential** area with the specific objective to *“To provide independent living and care for the older person”* under the new Kildare Development Plan 2023-2029.

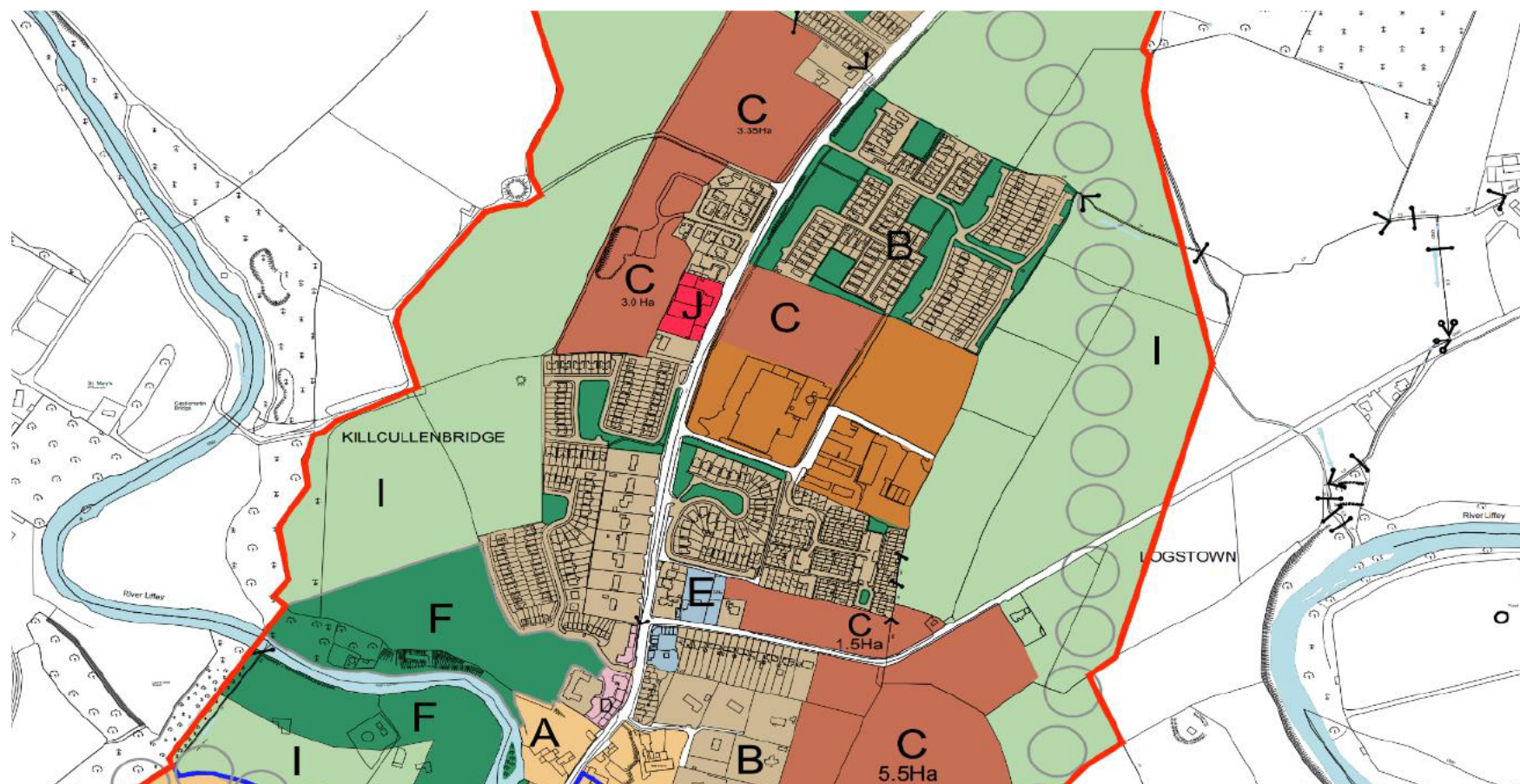


Figure 7: Proposed Land Use Zoning, Source : Kildare Development Plan 2017-2023

“C” – New Residential

The objective for this zone is to:

“To provide for new residential development.”

The Vision:

“The purpose of this zoning is to provide new residential development and other services incidental to residential development. While housing is the primary use in this zone, recreation, education, crèche/playschool, community buildings and sheltered housing will also be permitted by the Council. Limited local shopping facilities will be considered to serve the local needs of the residents.”

The following use classes are **permitted** under this zoning objective :

Childcare/Creche/Playschool	Dwelling Unit	Park/Playground	Place of Worship
Playing Fields	Residential	Utility Structures	

The following use classes are **open for consideration** under this zoning objective :

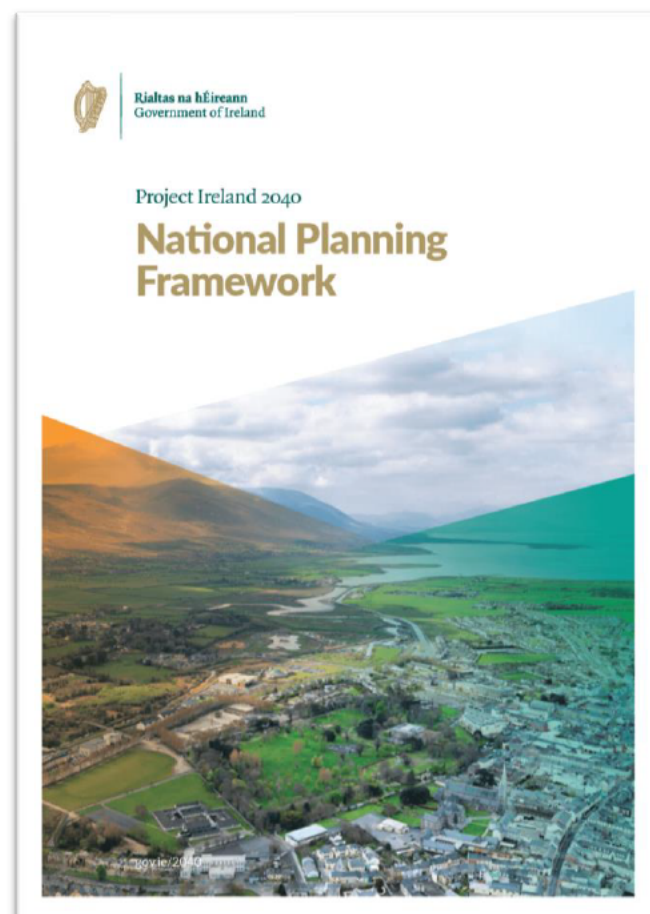
Community Hall	Cultural uses/library	Guest House	Recreational Buildings
Hotel	Halting site	Health centre/clinic	Restaurant
Medical and related consultancy	Nursing Home	Pub	School
Shop (Convenience)	Sport/leisure Complex	Tourist Camping Site	Caravan Park

The following use classes are **not permitted** under this zoning objective :

Broiler House	Car Parks	Cattle shed/Slatted Unit	Retail Warehouse
Cemetery	Cinema, dancehall, disco	Funeral Homes	Shop (Comparison)
Garages/car repairs	Heavy Commercial vehicle parks	Take-Away	Stable Yard
Industry	Industry(light)/ Workshop	Motor Sales	Warehouse (Wholesale)
Offices	Petrol Station	Repository, store, depot	Waste Incinerator

5.0 Relevant Frameworks ,Guidance ,Plans and Policy

5.1 National Planning Framework



The National Planning Framework (NPF) is the high-level strategic plan for shaping the future development in cities, towns and villages in Ireland, formulated by the Government of Ireland up to the year 2040. The NPF represents a framework to guide public and private investment, to create and promote opportunities and to protect and enhance the environment.

The NPF states that the administrative area of Kildare County Council is included in the East and Midlands Regional Authority (EMRA) area. In Appendix 2 of the NPF, Kilcullen is specifically mentioned regarding population and employment in urban settlements.

Population & Employment in Urban Settlements in the Eastern and Midlands Regional Assembly Area, Census Population 2016				
Settlement Name	Population 2016	Resident Workers	Total Jobs	Jobs: Resident Workers
Kilcullen	3,710	1,573	907	0.577

Within the NPF there rests a framework which is provided for formulating and implementing policies that deliver age friendly housing which is stated as follows:

“ESRI projections indicate that the numbers of people aged over 65 will more than double to 1.3 million people by 2040, making up approximately 23% of the population. This compares to 13.5% in 2016. In addition, it is expected that the population aged over 85 will quadruple. As people get older, they are likely to have increasingly complex healthcare needs, with a requirement for services and facilities to support provision of suitable and necessary care. As more people live longer lives, they will want to stay healthy and independent, live in their own homes and communities and keep to a minimum their use of in-patient and out-patient hospital services. Government policy is to support older people to live with dignity and independence in their own homes and communities for as long as possible. In providing a more seamless and appropriate continuum of housing choices with appropriate supports for older people and a built environment that is attractive, accessible, and safe, older people will be supported and motivated to enjoy more active, healthy and connected lives and to age confidently and comfortably in their community.

This further reinforces the need for well-designed lifetime adaptable infill and brownfield development close to existing services and facilities, supported by universal design and improved urban amenities, including public spaces and parks as well as direct and accessible walking routes. The provision of such accommodation can provide opportunities for older people to downsize from larger houses within their existing communities. This may be integrated with more supportive communal and specialist care accommodation that will be required by some older people.

The National Policy Objective 30 provided within the NPF is as follows:

“ Local planning, housing transport / accessibility and leisure policies will be developed with a focus on meeting the needs and opportunities of an ageing population along with the inclusion of specific projections, supported by clear proposals in respect of ageing communities as part of the core strategy of city and county development plans. ”

The Proposed Zoning of the site would facilitate the creation of residential uses for the older population, along with a potential nursing home and primary care centre on site. A potential future development shall be catering to healthcare design together with efficient layouts, safe and secure gardens and dementia friendly environments, providing for a supported and dignified way of life for older persons within Kilcullen.

The proposed rezoning will provide a more seamless and appropriate continuum of Home Care, Independent Living, Primary and Acute care, Short and Long-term Care all on the one site, providing for desirable, alternative housing options for the Older Person within Kilcullen and beyond.

The location of the subject site, c.10 minutes walking distance from Kilcullen Town Centre, would result in a highly attractive and accessible environment for both visitors and more active residents. This will allow residents to maintain their strong sense of connection to the local community within Kilcullen.

As previously demonstrated in Section 3 of this document, the context of the subject site location is important in determining the optimal use of the land. The subject site is surrounded on three sides by existing commercial and existing residential development while adjoining the Naas Road. Therefore, it is reasonable to present the subject site as an infill site for development.



The NPF emphasises the importance of renewing and developing existing settlements rather than continuing the sprawl of cities and towns into the countryside of the detriment of existing town centres and smaller villages. The NPF mentions that 40 % of all new housing shall be provided within the built-up areas of cities, towns, and villages on infill and/or brownfield sites. However, since the subject site is not a brownfield site it could be considered an infill site when the surrounding site and areas are considered. The NPF also mentions that within this 40 % , future housing shall be considered within the existing footprint of built areas.

To that end the following requirement is stated as follows:

- ***Making better 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, better serviced by existing facilities and public transport.***

There are several additional policies contained within the NPF that support the proposed rezoning of the subject site.

National Policy Objective 3a	<i>Deliver at least 40% of new homes nationally, within the built-up footprint of existing settlements.</i>
National Policy Objective 3c	<i>Deliver at least 30% of new homes that are targeted in settlements other than the five cities and their suburbs within their existing built up footprints</i>
National Policy Objective 11	<i>In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.</i>
National Policy Objective 34	<i>Support the provision of lifetime adaptable homes that can accommodate the changing needs of a household over time.</i>
National Policy Objective 35	<i>Increase residential density in settlements through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes area or site-based regeneration and increased building heights.</i>

5.2 The Regional Spatial Economic Strategy: Eastern and Midlands Region



The Regional Spatial and Economic Strategy 2019 – 2031 (RSES) is a strategic plan and investment framework to shape the future development of the eastern and midlands regional area to 2031 and beyond. The RSES is prepared having regard for the detailed provisions of NPF as part of the overall planning policy hierarchy of Ireland.

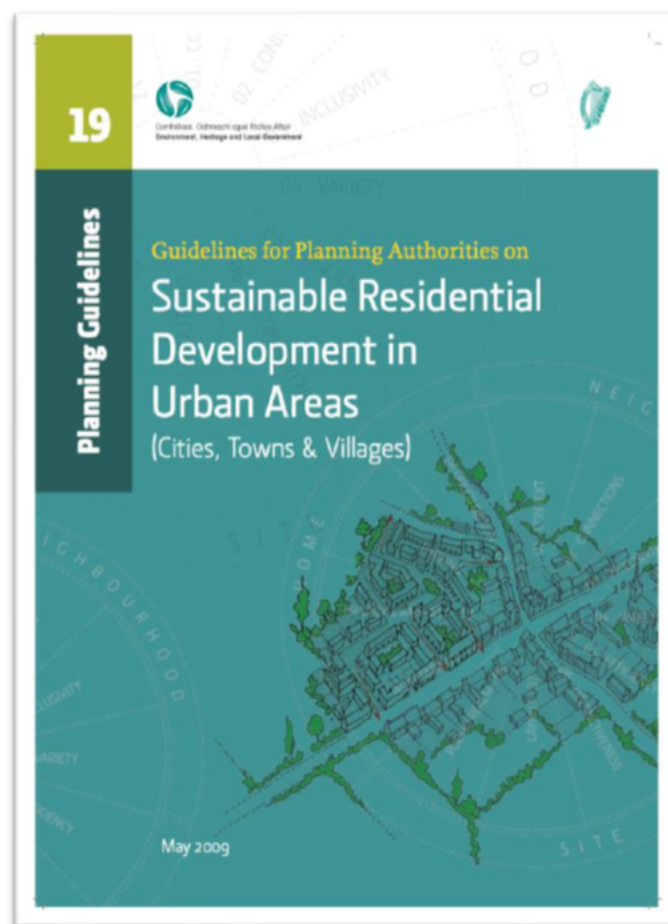
The RSES also highlights the importance of supporting communities with high quality healthcare provision for the Older Person. The following extract from RSES entitled ‘Age Friendly Communities’ states that:

“ There is an urgent need for responsive planning policy to avoid an ageing population crisis. In 2016, just under 1 in 8 people in the Region are aged over 65 but it is this cohort that is projected to increase most significantly over the lifetime of the RSES, with growth rates of over 85’s set to almost double. The RSES recognises that many factors that contribute to a good quality of life for older people are community-based and that all sectors – government, businesses, voluntary groups, service providers, local authorities and the public – have a role in creating an age-friendly society. This requires high quality healthcare and public services and, where appropriate, the choice of affordable care in the home or in the community for our older citizens. Quality placemaking should also integrate the principles of universal access in the design of buildings, housing, public realm, amenities and transport services to create places that are safe, easy to move around and accessible to all”

As demonstrated in the above extract of the RSES: ERMA, planning has a crucial role to play in addressing a potential ageing population crisis in the form of a significant demand and shortage in the provision of care and accommodation for the Older Person in Ireland, whether in the form of Independent Living or Dementia Friendly Recuperation and Step-Down Facilities, both short- and long-term stay.

The proposed site zoning will be instrumental in creating a space that helps in securing best in class Residential Design also providing a supportive and dignified way of life for older persons within Kilcullen, Co. Kildare and do well to serve the forecasted demand. This is therefore considered consistent with the above aspirations of the RSES 2019-2031.

5.3 Section 28 Ministerial Guidelines



Sustainable Residential Development in Urban Areas (2009)

The Department of Environment, Heritage and Local Government in May 2009 published The Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities. The Guidelines are provided jointly with the accompanying best practice Design Manual and together provide a sound basis on which planners, designers and developers can translate ideals of sustainable living into a practical reality. Chapter 4 of the Department Guidelines, entitled 'Planning for Sustainable Communities', highlights the importance of providing housing which is well integrated with the provision of supporting services such as schools, community services, healthcare facilities and amenities.

Section 4.7 deals with healthcare facilities and is stated as follows; *"Planning authorities should consult the Health Services Executive at the development plan drafting stage in relation to the provision of healthcare facilities in major new development areas. In addition, consideration should also be given to the variety of residential needs **such as of the elderly** and people with disabilities – for example, is there a requirement to provide alternative forms of residential accommodation e.g., nursing homes in the area? In this regard, with our ageing population, planning authorities could consider an objective to provide specifically for **residential development for independent step-down dwellings for elderly people that benefit from communal and caretaking facilities. Such development would provide alternative residential choices for elderly people not wishing to enter a nursing home and may free up larger family homes in established residential areas.**"*

The Proposed Rezoning will lead to a better residential choice for the older population, with the inclusion of independent living for the more capable elderly residents. By providing an alternate and desirable residential choice for the older person, larger family homes in the Kilcullen locality and surrounding areas of Kildare will be freed up, whilst maintaining a sense of place and connection with the community. In addition, the proposed rezoning of the subject site could facilitate a safe and secure healthcare environment, providing a strong sense of assurance and security to other family members of elderly residents, including sons and daughters, with the knowledge that their parents and/or relatives could be cared for in a development that provides a comprehensive number of specialist care supports all readily accessible on one site. This is considered consistent with the above-mentioned provisions of the said Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities 2009.

5.4 Age Friendly Ireland - 10 Years Delivering for Ireland | A Decade of Progress



In 2019, Age Friendly Ireland published '10 Years Delivering For Ireland | A Decade Of Progress'. In respect of the housing needs and preferences of Older Persons in Ireland, this research confirms respondents' preferences for housing which are highlighted as follows;

- *Stay in their homes and communities for as long as possible.*
- *Maintain autonomy, control and independence through living in appropriate housing.*
- *Grow old in a safe, comfortable, secure affordable, and interesting community.*
- *Maintain and develop their social networks.*
- *Experience less social isolation.*
- *Participate in decision-making about their housing environment.*

The proposed rezoning of the subject site at Kilcullen will be provide an opportunity to create a “best in class” healthcare design with efficient layouts, safe and secure gardens and dementia friendly environments. The proposal will also be able to provide a more seamless and appropriate continuum of Home Care, Day care, Independent Living, Primary and Acute care, Short and Long-Term Care all on the one site. This will support the achievement of the abovementioned preferences of the Older Person as confirmed in this publication, providing for a supported and dignified way of life for Older Persons within Kilcullen, Co. Kildare.

5.5 Kildare Age Friendly Strategy - 2019 - 2021



The proposed rezoning has been aimed to support the achievement of the following development goals of the Kildare Age Friendly County Alliance as contained within the publication;

- *To enhance and improve the lives of older people in the County & help create an environment where older people feel safe in their community and in their own homes.*
- *To enable older people, live active and healthy lives.*
- *To encourage older people to participate in local community and sporting activities.*
- *Working in partnership with the Local Authority and State Agencies.*
- *To help create a physical environment which is Age Friendly and caters to the demographic.*

5.6 National Launch of Age Friendly Ireland's Suite of Age Friendly Housing Resources & The agefriendlyhomes.ie Website

The proposed development has been prepared following the National Launch of Age Friendly Ireland's Suite of Age Friendly Housing of Age Friendly Housing Resources & the agefriendlyhomes.ie website by Age Friendly Ireland in collaboration with the Housing Agency, the Department of Housing Local Government and Heritage and the Department of Health on the 22nd of June 2021, in the presence of Minister Mary Butler. The **Agefriendlyhomes** website consists of a suite of resources compiled by Age Friendly Ireland which provides an array of information to support the development of Age Friendly Housing, such as case studies, research, funding information and design templates.

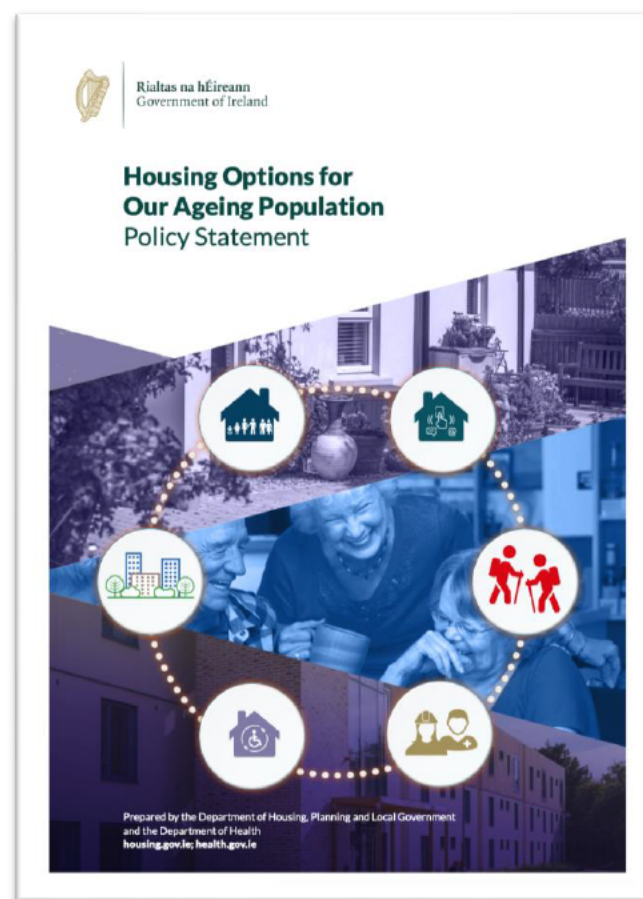
This is a very unique web portal in an Irish context and will provide a one stop shop for all resources to support Age Friendly Housing. Such recently published Resources are as follows;

- *Ten Universal Design Features to include in a Lifetime Adaptable and Age Friendly Home.*
- *Age Friendly Rating Tool.*
- *Rightsizing Research Report.*
- *Age Friendly Primary Care Centre Guidelines.*
- *Age Friendly Planning Guidelines & Recommendations.*
- *Age Friendly Pre-Planning Guidelines for Long Term Residential Care.*
- *Age Friendly Rightsizing Guide.*
- *Age Friendly Parking Toolkit*
- *Age Friendly Seating Toolkit.*



Careful consideration has been afforded to these recently published guidance documents as issued by Age Friendly Ireland prior to the submission of this planning application to Fingal County Council.

5.7 Housing Options for Ageing Population

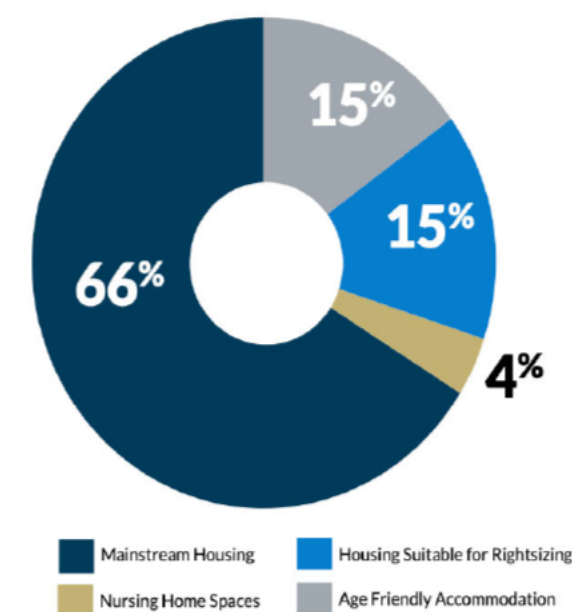


Citing research Commissioned by the Ireland Smart Ageing Exchange (ISAX) & the Housing Agency, in respect of our ageing population and the requirement to provide suitable housing options for the Older Person by 2031, the Government's Policy Statement confirms the following.

"The report, Housing for Older People – Thinking Ahead estimates that 15% of those 65+ would be willing move to a different home in their community and that a further 15% would choose to move to age-friendly accommodation, if it were available. A further 4% of older people may live in nursing homes. It is estimated that 66% of those over 65 would prefer to stay in mainstream housing. Based on these estimates the requirement for housing suitable for older people by 2031 is as follows

- ***Rightsizing housing, within existing communities (i.e. smaller dwellings designed to meet the needs of older people) – 150,000.***
- ***Age friendly accommodation – 150,000.***
- ***Nursing home spaces – approximately 36,012.***

As previously identified, planning has a crucial role to play in addressing a potential aging population crisis in the form of a significant demand and shortage in the provision of care and accommodation for the Older Person in Ireland, whether in the form of Independent Living or Dementia Friendly Recuperation and Step-Down Facilities, both short- and long-term stay. The above findings highlight that the State is facing an immediate and enormous challenge in terms of the forecasted demand for suitable healthcare accommodation for the Older Person up to 2031. In relation to supported housing and sheltered housing, ***the review report said that such schemes, linked to appropriate community health and social care services, can offer an alternative option to support older people and should be considered in the context of future service planning as an integral component of long-term care.*** The report notes that sheltered housing, which is underdeveloped in Ireland, may offer significant benefits in the longer term and emphasises the importance of ensuring that health sector funds remain effectively focused on healthcare requirements.

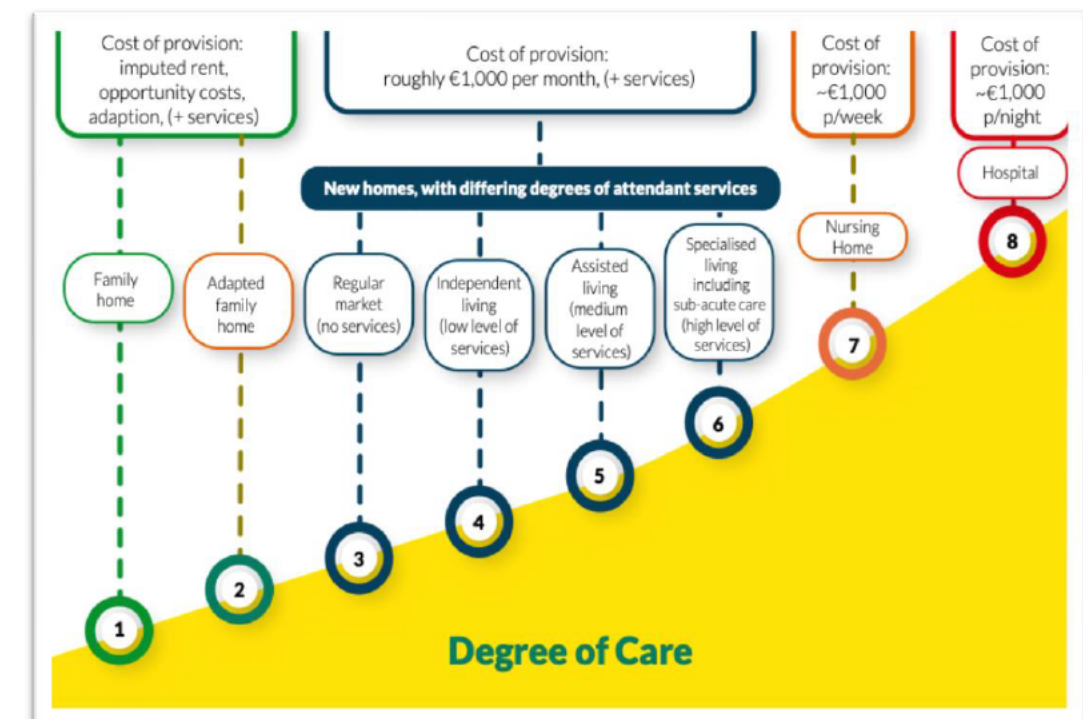
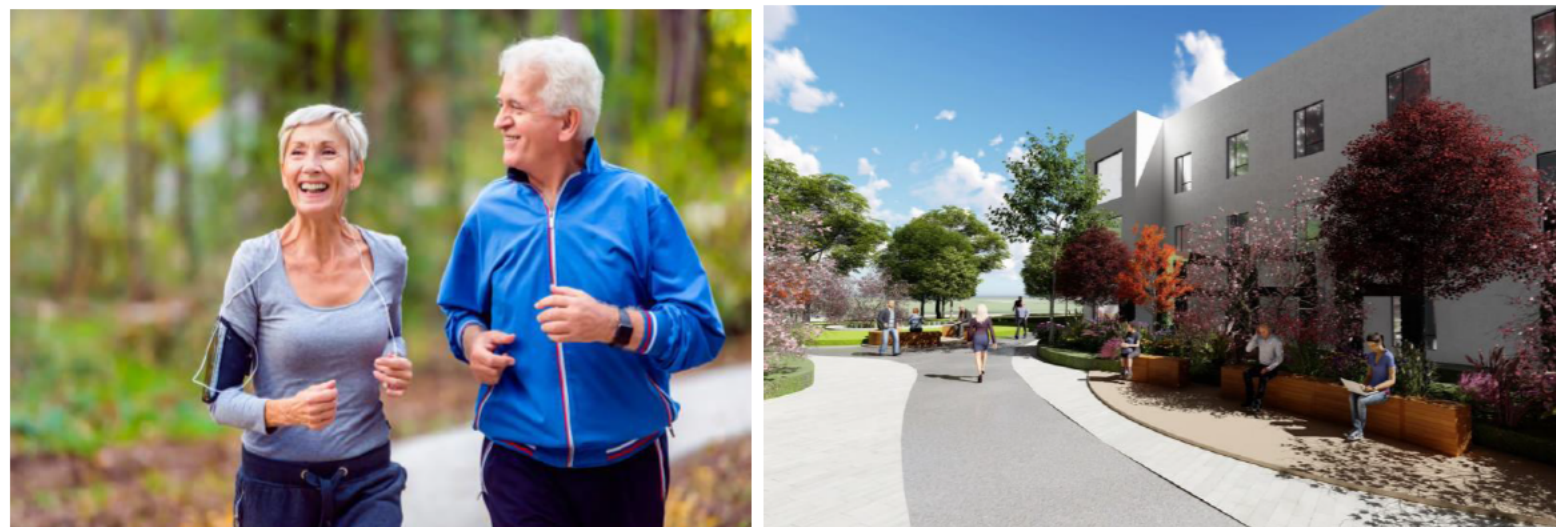


5.8 The Housing Agency - Thinking Ahead: The Financial Benefits of Investing in Supported Housing for Older People

The following research published by the Housing Agency on behalf of Peter Burke TD, Minister for State with responsibility for Local Government and Planning in October 2020, *'Thinking Ahead: The Financial Benefits of Investing in Supported Housing for Older People'*, provided for a cost-benefit analysis of Supported Housing Options in Ireland, examining capital costs, revenue stream costs and benefits of supported living. This paper was conducted as part of a range of recommended actions under the policy statement *'Housing Options for Our Ageing Population'*, published by the Government in March 2019.

Supported Housing was grouped into the following three categories for costing purposes as part of the analysis undertaken;

- **Independent Living** – Lowest cost, low level of support requirement.
- **Assisted Living** – Medium cost, medium level of support requirements.
- **Specialized Living** – Higher cost, high level of support requirements.

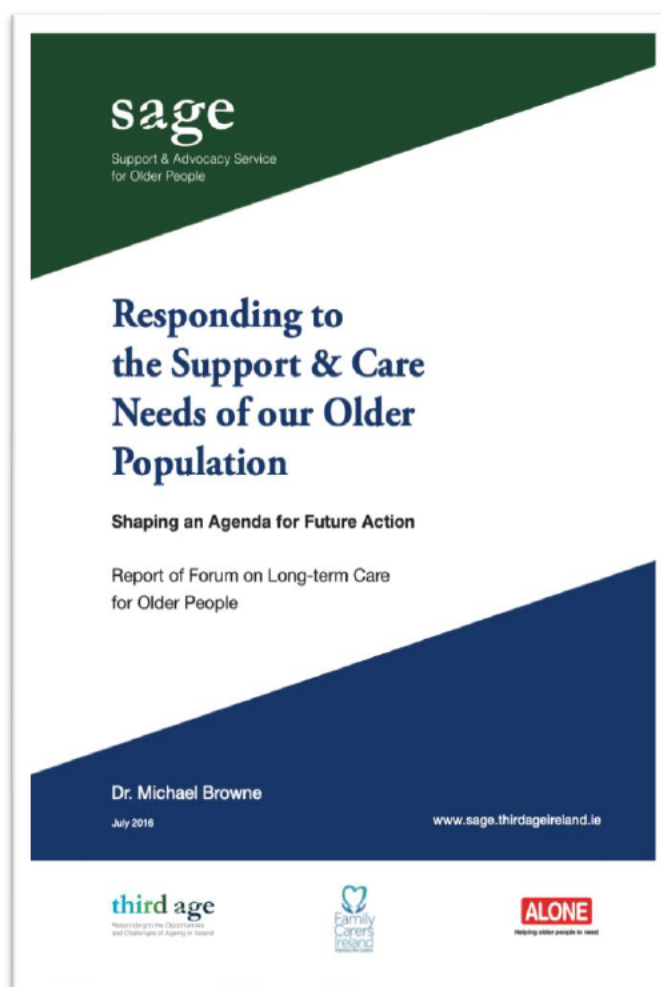


The abovementioned Supported Housing stages are demonstrated in the 'Degree of Care' graphic accompanying this page as part of a sliding range of care supports. 'Independent Living' at Stage 4 represents a home constructed to reflect older persons' needs. Stage 5 accommodation provides for increased services and is referred to 'Assisted Living'. Under this form of accommodation there may be healthcare manager, housing manager, or an activities coordinator on site.

This research draws the following key conclusion in respect of the financial importance to the State in providing suitable Supported Living Accommodation.

'This paper concludes that greater provision of Supported Living accommodation would generate large savings for the State. By making assumptions about the future investment path in Supported Housing where there is increased investment, we demonstrate that there are strong financial benefits available to the State. We estimate that direct public investment in an additional 11,400 Supported Housing homes over the next 10 years could potentially generate a total benefit of approximately €900 million for the State. Larger estimates of the required number of Supported Housing units, such as that found in the policy statement, would naturally produce a higher level of estimated savings' (The Housing Agency, Pg. 9). Having regard for the evidence of the abovementioned research, the proposed rezoning could pave the way in facilitating 'Universally Designed' Independent, Assisted and Specialist Living Units as a key component of future development thereby providing a supported and dignified way of life for the Older Person whilst being of significant financial gain to the State.'

5.9 SAGE - Responding to the Support & Care of our Older Population (2016)



In 2016, the 'Support and Advocacy Service for Older People' as part of 'Sage' initiated the following Forum on Long-term Care in partnership with Third Age, ALONE and Family Carers Ireland titled 'Responding to the Support & Care Needs of our Older Population'. This research paper set out to advise on how best to create a healthcare model more in keeping with the core values of choice, dignity, equality, self-determination, social solidarity and, indeed, social justice. The Forum consisted of a three-stage process:

- (i) A public consultation on the matter.
- (ii) A forum event involving key stakeholders to consider a draft report based on the public consultation
- (iii) The establishment of structures and mechanisms to implement an action agenda arising from Stage 1 and Stage 2.

This report presented the outcomes of the public consultation process and the related Forum event. In addition, these outcomes were integrated with relevant research findings within the broader policy and legal context.

Section 3 of this research paper, titled 'A Framework for Long-term Care', discusses various components of Long-Term Care provision, one of which Maximizing the Role of assisted living housing;

*"To date voluntary housing organisations have been the largest provider of sheltered housing. However, there is a relatively limited supply of fully developed sheltered housing as defined by the Irish Council for Social Housing (ICSH). **In view of the increasing numbers of people with additional care and support needs and their expressed wish to remain living in their own communities ,there is a clear need for the development of more supported or sheltered housing. Of crucial importance here is the availability of communal facilities and services, home care packages and, crucially, easy access to medical and nursing care as required. This is an area that requires further development in Ireland.** Housing with care clearly offers a dignified response to many people who can no longer live in their own homes but who do not require nursing home care. A UK Department of Health funded evaluation of "extra care" housing schemes found "similar or lower costs" than residential care but better outcomes. Clúid has recommended flexible schemes with varied house types, and the careful design of homes which would allow for multiple uses as the person's needs change over time. The Centre for Excellence in Universal Design has similarly outlined key principles for the design of housing for dementia that may facilitate ageing in place. **There is scope for much more development of assisted living facilities"**.*



The findings of the abovementioned research provides further confirmation of a well established need to provide independent assisted and specialized living to older persons. The proposed rezoning of the subject site complies with governmental regulations and shall be a great opportunity to provide a development with best-In-class healthcare design and safe, secure environment for the elderly.

6.0 Rationale

The planning submission proposes to change the zoning objective for the subject site from 'H'- Industry and Warehousing to 'C' – New Residential with the specific objective to *“To provide independent living and care for the older person”* in accordance with the new Kildare Development Plan 2023-2029. This is to support the new draft development plan to provide appropriate housing options for elderly citizens since at the time writing there is no nursing home or age friendly living estate in the town of Kilcullen and its environs. This represents a gap in terms of the town's health care/community service infrastructure.

Notwithstanding the expiration of the Kilcullen LAP in November 2020, it is recognised that Kildare County Council's own vision as set out in this LAP under Objectives CF 3, 4 and 5, is to support and facilitate the development of health centres, local clinics, nursing care facilities and sheltered housing within Kilcullen. The proposed rezoning therefore represents a significant opportunity to provide a unique development that undertakes the responsibility of housing and nursing older citizens. In addition, Objective CF4 demonstrates that the intention of Kildare County Council is *‘To co-operate with the HSE in the provision of health, social services and community facilities within the town’*. **The strategic location of the subject site at Kilcullen, c. 12.3 Km from Naas General Hospital and with immediate access to the M9 Motorway is therefore considered particularly well positioned to provide this proposed rezoning objective for *“To provide independent living and care for the older person”*.** In respect of Healthcare and Medical Facilities, it is recognised that the following policies and objectives contained within the Draft Kildare County Development Plan 2023 – 2029 support the provision of the proposed re-zoning within Kilcullen.

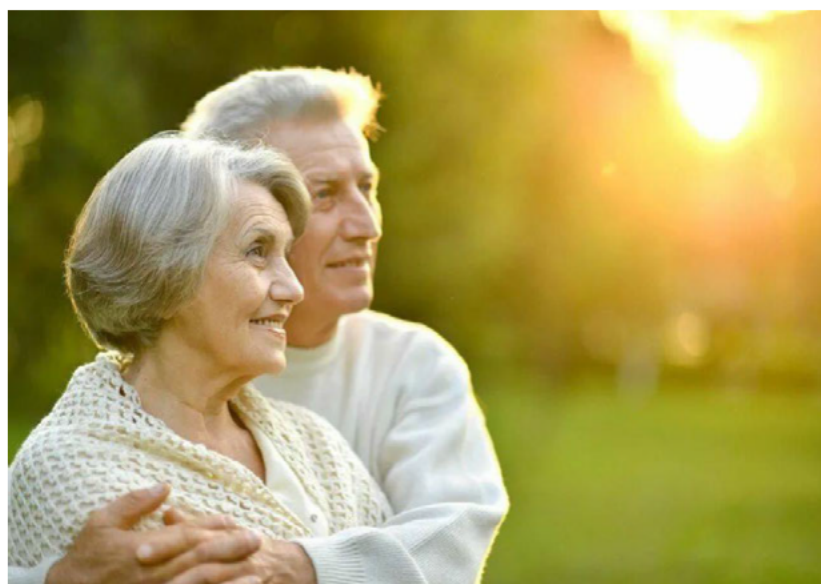


HS1	<i>Respond to current and future health needs to support healthy communities across the county and to facilitate and enable a multiagency approach to service delivery in community settings.</i>
HS2	<i>Support and co-operate with promoters or operators of public and private health care facilities by facilitating and encouraging the provision of improved health care facilities in appropriate locations.</i>
HS3	<i>Facilitate the integration of appropriate healthcare facilities within new and existing communities.</i>
HS4	<i>Support the provision of 'one stop' primary care medical centres and GP practices, particularly along public transport routes and at locations easily accessible to members of the wider community.</i>
HSO 3	<i>Support the delivery of infrastructure, facilities and services that promote and support healthy communities across Kildare. This includes progress to establish primary care centres in Kilcock, Celbridge and Kildare Town and the provision of high-quality amenity space that promotes healthy lifestyles.</i>
SN 3	<i>Provide for and facilitate the provision of accommodation to meet the needs of older people and to encourage the provision of a range of housing options for elderly persons in central, convenient and easily accessible locations and to integrate such housing with mainstream housing.</i>
SNO 1	<i>Support: (a) The provision of housing for groups with specific housing needs, including the elderly, people with disabilities, the homeless, those in need of emergency accommodation and Travellers, at appropriate locations and in accordance with the policy.</i>
SN 1	<i>Seek to ensure that groups with special housing needs, such as the elderly, people with disabilities, the homeless, those in need of emergency accommodation and Travellers are accommodated in a way suitable to their specific needs.</i>

7.0 Proposed Rezoning

It is our contention that the subject site is best positioned to meet the criteria to be rezoned "C" New Residential with the specific objective to "To provide independent living and care for the older person". The proposed site is located at Naas Road, Kilcullen, Co. Kildare.

The subject site is strategically located within Kilcullen, c. 12.3 Km from Naas General Hospital and with immediate access to the M9 Motorway and is therefore considered particularly well positioned to facilitate a development catering to the needs of the older person. The location of the subject site is also within easy reach of the centre of Kilcullen, well connected with local amenities, services and integrated very well into the surrounding community. This will allow residents to live independently and self-sufficiently in a way that maintains an established sense of connection to the community of Kilcullen.



CWPA Planning and Architecture have been retained by our client Curragh Property DAC, to prepare this submission relating to changing the zoning objective for the subject site from '**H**' – '**Industry and Warehousing**' to '**C** – '**New Residential**' with the specific objective to "To provide independent living and care for the older person".

This is to support the new draft development plan to provide appropriate housing options for elderly citizens, since at the time of writing there is no nursing home or age friendly living estate in the town of Kilcullen and its environs. This represents a gap in terms of the town's health care/community service infrastructure. We believe it is essential for the development plan to recognize the importance of providing housing opportunities for elderly citizens in order to maintain the vibrancy of established communities in towns such as Kilcullen in sustainable manner. Regarding this, CWPA Planning, and Architecture respectfully requests the Kildare County Council to amend the Draft Development Plan 2023-2029 by changing the zoning objective for the subject site from '**H**'- **Industry and Warehousing** to '**C** – **New Residential** with the specific objective to "To provide independent living and care for the older person".