

Submission to the Draft Kildare County Development Plan 2023- 2029

on behalf of Glenveagh Properties Ltd

May 2022



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Document Control Sheet

Client	Glenveagh Properties Ltd	
Project Title	Kildare Submission	
Document Title	Submission to the Draft Kildare County Development Plan 2023-2029	
Document Comprises	Volumes	--
	Pages (Including Cover)	22
	Appendices	--
Prepared by	Andrea McAuliffe/Susan Cullen	
Checked by	Susan Cullen	
Office of Issue	Cork	
Document Information	Revision	B
	Status	Final
	Issue Date	May 2022

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1. Introduction

This submission has been prepared by McCutcheon Halley Chartered Planning Consultants on behalf of Glenveagh Properties, in response to public notices inviting submissions from third parties and interested parties on the Draft Kildare County Development Plan 2023-2029 review in accordance with section 12(2)(b) of the Planning and Development Act 2000.

Our client welcomes the publication of the Draft Kildare County Development Plan 2023-2029 and the opportunity to participate in the plan making process which will inform the future delivery of homes in the lifetime of the plan and beyond.

This submission will focus on:

- Core Strategy – Our client considers that the housing allocation provided for the County over the lifetime of the plan is insufficient to meet the needs of the projected population. The assumptions in the HNDA need to be reconsidered in order to provide sufficient and affordable housing in Kildare.
- Development Management Standards - particularly the onerous and overly prescriptive standards relating to public open space, private dwelling design standards, car parking, and SuDs measures.

2. Rationale for Submission Request

We welcome the opportunity to make a submission to the Draft Development Plan and ask that the County Council consider the following items:

- Core Strategy
- Development Standards

We will discuss each of these items below:

2.1 Core Strategy

Kildare continues to be a key area for population growth for the country which has been reflected in the continued investment in public infrastructure. The County's proximity to Dublin together with the improved rail and road connections have added the County's attractiveness as a place to live. Despite the public investments made to infrastructure, the Draft County Development is proposing to throttle development by limiting the quantum of residential development during the lifetime of the Plan to levels which we consider will only add to shortfall in housing and further increase the cost of a new home in the County.

An analysis of the population growth and dwelling targets between the 2016-2023 (extant KCDP) and 2023-2028 (draft KCDP) indicates the projected annual population growth between the two periods is similar, with a slightly lower annual growth projected at County level in the draft KCDP period. While the change in the annual projected population growth between the two Development Plan periods are relatively minor, there is a considerable reduction in the projected dwelling requirement.

The reduction in the projected dwellings required to facilitate this population growth is based on a revised set of assumptions and to some degree recent trends, such as an increase to household size, which we consider are an indication of a lack of housing rather than an increase in family size.

In order to provide for the future population of Kildare we consider that the HNDA models needs to be amended to consider:

- Recent population projections released by the CSO
- Bring the average household size in line with targeted State average for 2040; and
- Consider the impact of vacancy rates on available housing supply.

Each of these points is considered in detail below and together illustrate the need to amend the housing target to the end of the Plan from 9,144 to 17,607 units in order to provide the minimum amount of housing necessary to cater for Kildare's population over the lifetime of the Plan.

2.1.1 Population Growth

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

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

Table 2.2 - Transitional Population Projections

Source: NPF Roadmap (July 2018) and RSES (June 2019)

Figure 1: Table 2.2, Chapter 2 of the Draft Development Plan

These population projections are based on the NPF targets for a revised spatial distribution of population growth and are therefore considered policy based rather than demand based projections for the County.

The CSO Regional Population Projections 2017 – 2036 outline a range of growth scenarios between 2016 to 2036 that are based but on trends and varied assumptions in terms of migration, migration flows and fertility as detailed in the table below.

Regional Population Projections							
2017 -2036							
Table 2.1 Actual and projected population of Regional Authority areas by scenario, 2016 and 2036							
Regional Authority Area	Projected Population 2036						
	Dublin Outflow			Dublin Inflow			
	2016	M1F2	M2F2	M3F2	M1F2	M2F2	M3F2
'000							
Border	393.3	476.2	457.3	436.4	432.1	413.2	392.3
Dublin	1,335.9	1,589.9	1,491.5	1,400.9	1,860.7	1,762.4	1,671.9
Mid-East	690.9	965.3	937.1	906.8	876.2	848.0	817.7
Midland	293.4	405.4	393.9	383.3	339.2	327.6	317.0
Mid-West	472.5	553.0	530.6	506.3	548.4	525.9	501.6
South-East	421.2	500.2	489.7	477.5	446.9	436.4	424.1
South-West	685.0	812.8	781.2	750.9	809.5	777.9	747.7
West	447.5	509.7	490.5	468.5	499.5	480.3	458.3
State	4,739.6	5,812.5	5,571.7	5,330.6	5,812.5	5,571.7	5,330.6

Figure 2: Table 2.1 of the CSO's CSO Population and Migration Estimates, April 2021, published in August 2021

Table 2.1 of the CSO's Regional Population Projections estimated the state Population to be **5,011,500** in April 2021 (CSO Population and Migration Estimates, April 2021, published in August 2021). The projections published in the NPF in 2018 which indicated a population of 'almost 5.7 million by 2040' a total increase of 1 million people from 2016 levels. These projections indicated an annual rate of growth of circa 40,000 persons per annum. Based on the estimated population of 5,022,500 in 2021, the State's population has experienced a rate of growth of circa 75,000 persons per annum in the period from 2016 to 2021.

It is clear that at a national level population growth is outstripping projections and while the full extent of the rate of growth will not be available until the 2022 census figures are released, regard should be had to the CSO estimates.

Furthermore, when the Regional Population projects are applied to Kildare County to 2031, almost every scenario projects a higher population than that projected by the NPF Roadmap. Regional Population projections being lower than the actual growth is an indication that growth in Kildare County is likely higher again. These projections are substantiated by evidence of the lack of affordability in the housing market, and reports from industry experts on lack of housing supply.

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

We consider that this additional population pressure, coupled with the HNDA approach to calculation household size and vacancy rates, is resulting in a considerable under-estimate of the housing need for the period of the Development Plan and that this under provision will have long term repercussions in providing affordable family homes in the County.

2.1.2 Household Size

Prior to 2011, household sizes were falling across the country. This was reversed in 2016 due to lack of supply. The HNDA takes the starting household size for Kildare as 3.0 in 2016, projecting it to fall to 2.77 by 2031 which fails to acknowledge the impact of the lack of supply on the 2016 figures. Reliance on this assumption permeates through the Draft Development Plan contributing to an under provision of new housing that will have long terms implications in housing supply in the County extending beyond the timeframe of the new Development Plan if not addressed.

National and Kildare County household size rates had been falling consistently during inter-censal periods until 2016. In 2011 the household size in Kildare County was 2.95 and in the State was 2.73. By 2016 these had risen to 3.0 and 2.75 respectively.

Table 15 of Appendix 1 projects that the household size in Kildare will only fall to 2.77 by 2031. This is remains higher than the state average household size of 2.75 in 2016. This figure appears to be based on a reverse calculation based on the projected population divided by an assumed number of projected households for the County. This approach actually highlights that there is an issue with the total number of units to be provided during the lifetime of the Plan as the average household size in is a clear indication of an unaffordable and constrained housing market, forcing delays in people forming their own households. This approach will result in continuing to perpetuate a constrained housing market.

We acknowledge that Kildare also has a higher than average percentage of residents within the younger ages categories which also contributes to household size. This is indicative of a higher proportion of younger families, however it is also a predictor of increased pressure for new household

formation in the short to medium term This demographic profile would suggest an underlying pressure and demand for housing that will result in a higher-than-average drop in household size.

	0-14	15-24	25-44	45-64	65+	15-64 Workforce
State	1,006,552	576,452	1,406,291	1,135,003	637,567	3,117,746
	21.1%	12.1%	29.5%	23.8%	13.4%	65.5%
Kildare	53,560	27,957	67,391	51,582	22,104	146,930
	24.1%	12.6%	30.3%	23.2%	9.9%	66.0%

Table 1 Population, Census 2016, by Age and Percent, Kildare and the State

Figure 3: Table 1, Appendix 1 of Draft Development Plan

Table 8 of Appendix 1 compares headship rates by age category for the State and Kildare. This measure of household formation provides an indication of when on average an age cohort considers themselves the 'head of household'. An increase in this age category, provides a clear indication of the availability and affordability of housing. In 2011 the headship rate in the 25–29 age category in Kildare was only marginally higher than the state average (0.36 for Kildare, compared with 0.35 for the state). By 2016 headship rates in this category had dropped at both state and county level with the drop in Kildare greater than the state average (0.27 in Kildare, compared with 0.30 for the state). This would indicate that supply and affordability were becoming even more constrained in Kildare.

We submit that that Draft Kildare County Development Plan HNDA needs to fully consider the basis for the reversal of the trend in relation to household size and formation. By relying on the recent trend, which has occurred during a well-established housing shortage and the period immediately prior to the housing crisis, there is a high risk that using these figures to project future housing requirements will perpetuate the current shortfall.

We submit that the Draft KCDP HNDA should be revised to allow for the household size rate in County Kildare to fall to 2.5 by 2040 which is in line with the projection for the State.

2.1.3 Vacancy Rates

In line with the HNDA Guidelines, we note the HNDA tool does not account for vacancy rates in their projections as the Census data is not considered to give a true reflection on vacancy. Notwithstanding this Guidance, we consider there is an inherent flaw in the calculation of housing supply needs without recognising that all housing systems have a frictional vacancy rate.

The 2016 vacancy rate in County Kildare was among the lowest in the state at 5.9%, and in Celbridge was one of the lowest within the County at 3.4%. These low vacancy rates are an indication of the level of pressure on the housing market and the lack of any flexibility in the system, putting upward pressure on housing costs.

We submit that the draft KCDP HNDA should be revised to include a frictional vacancy rate of 5.9% in the estimating the dwelling requirement for Kildare County to 2031.

Proposed Amendments to the Draft Plan

We consider that changes to the Draft County Development Plan, including amendments to 'Appendix 1 - Housing Need and Demand Assessment & Housing Strategy' are required to ensure there is sufficient housing provided to cater for the population projected for the County.

We submit that the following amendments are required to the Draft County Development Plan to allow for an adequate supply of housing.

1. Revise the projected total households and average household size over the HNDA period to 2031 so as to:

- Bring the population growth to 2031 to be in-line with CSO M2F2 Dublin Outflow projections
- Adjust the average household size to align projection for State of an average 2.5 persons per household by 2040; and
- Apply a frictional vacancy rate of 5.9%

We consider that that this approach better reflects the actual demand for housing in Kildare and request that Table 15 : Projected total household and average household size over HNDA period to 2031 be amended as follows:

Year	Population Total	Number of Total Households	Average Household Size	Number of Anticipated Houses per Annum	Total Anticipated Houses between 2023 - 2031
2016	222,504	73,596	3.0	638	
2017	225,654 226,816	74,584 74,857	3.03	985 1,261	
2018	228,804 231,128	75,799 76,532	3.02	1218 1,676	
2019	231,954 235,440	77,700 78,742	2.99	1901 2,210	
2020	235,104 239,752	79,221 239,752	2.97	1,521 1,982	
2021	238,254 244,064	80,752 82,734	2.95	1,532 2,009	
2022	241,404 248,376	82,340 84,886	2.93	1,588 2,152	
2023	244,553 252,688	83,921 87,059	2.91 2.90	1,581 2,173	
2024	247,702 257,000	85,451 89,267	2.90 2.88	1,530 2,208	
2025	250,851 261,312	86,943 91,512	2.89 2.86	1,492 2,245	
2026	254,000 265,624	88,451 93,794	2.87 2.83	1,508 2,282	
2027	256,500 269,936	89,994 96,114	2.85 2.81	1,543 2,320	
2028	259,000 274,248	91,587 98,473	2.83 2.79	1,593 2,359	
2029	261,500 278,560	93,136 100,873	2.81 2.76	1,549 2,399	
2030	264,000 282,872	94,651 103,313	2.79 2.74	1,515 2,441	
2031	266,500 287,184	96,180 105,796	2.77 2.71	1,529 2,483	13,840 20,910
Household change 2017 -2031					32,200

2. Modify Table 2.3 Housing Target for County Kildare

Based on the revised population projections and an amendments to align the average household size to align with the 2040 State average of 2040, we submit that Table 2.3 of the Draft Development Plan be updated to reflect the actual quantum of new housing required to meet demand in the County.

We request the following amendments be made to Table 2.3 of the Draft Development Plan.

Kildare County Council		Annual Average	Total Households
A.	ESRI NPF scenario projected new household demand 2017-2031	1,483 2,147	22,238 32,200
B.	Actual new housing supply 2017-19	1,368	4,104
C.	Homeless households and estimated unmet demand as at Census 2016	N/A	291
	Housing Demand 2020-31 = Total (columns a-B+C)/12	1,535 1,788	18,245 28,387
	Dwelling Demand (Assuming 5.9% frictional vacancy rate)	1,894	30,062

3. Modify Table 2.4 – Methodology used to determine housing targets to end of the Plan period

We request that that as per our rationale on population projections, household size and vacancy rates that the following amendments be made to Table 2.4 of the Draft Development Plan:

Step	Source	Calculation
1.	Housing demand 2020-2031	18,425 30,062
2.	CSO – dwelling completions for 2020	- 1,661
	Net Dwelling Demand 2020-2031	28,401
	Annualised dwelling demand (divide by 11 years)	2,582 =16,764/11
3.	Annual Housing Completion target for Kildare 2021-2031	= 2,582 x 8 =1,524 x 8
	Dwelling demand to end of development plan period 2020 – 2028 (multiplied by 8 years)	20,655 = 12,192
4.	Housing completion estimates for 2021 and 2022	- 3,048
5.	CDP housing target to end of Plan period	17,607 = 9,144

The total number of units required during the lifetime of the Development Plan should be amended from 9,144 units to **17,607** units. To accommodate this growth, additional lands will be required in the main county towns with an estimated uplift from 222 ha to 449 ha.

We consider that the revised population projections and household size reflect the actual needs of the County and that if these modifications are not introduced in the new Kildare County Development Plan, the shortfall in housing will further contribute to increased costs for residential lands in the County. These costs will in turn result in an increase to the cost of housing making Kildare unaffordable to the next generation of families.

2.2 Development Management Standards

The Draft Kildare County Development Plan provides a range of development management standards that will be applied to new development proposals in the County. While these standards are intended to provide a framework that will lead to sustainable development, they are not intended to be so overly restrictive as to limit innovative design. We consider that while individually some of the development management standards proposed could be considered reasonable, the Draft Plan fails to acknowledge the repercussions on new development when all standards within the Development Plan are adhered to.

We submit that a comprehensive approach to development management standards which adheres to national guidelines be reflected in the new Development Plan to ensure that sustainable development which delivers the growth envisioned in the Core Strategy is achievable.

We submit that amendments to the development management standards is required for the following:

2.2.1 Open Space Provision

The Draft Development Plan contains a number of standards which relate to public open space and these standards are found in Chapter 15 of the Draft Development Plan. The standards in general have taken a quantitative rather than qualitative approach to the provision of public open space. While we accept that public open space must be considered within the Development Plan, overly prescriptive standards will limit developers' abilities to develop high quality public open spaces on sites in a way that reflects different sites topography and characteristics.

Section 15.6 of the Draft Plan states that *"Towns in Kildare will be required to provide a minimum of 2.5 hectares of Open Space per 1,000 of population which should include both formal and informal open spaces as follows:*

- *Formal (Active Open Space, Neighbourhood/local park, Play areas)*
- *Informal (Parks and Gardens, Amenity Green Space, Natural and semi-natural)*

The breakdown and quantum of formal and informal provision will be considered on a place-by-place basis."

Section 15.6.6 states the following in relation to Open Spaces

- *On greenfield sites, the minimum area of open space that is acceptable within the site is 20% of the total site area. This may include Natural / Semi-Natural Green Spaces incorporating the planting of native species and pollinator friendly areas which enhance biodiversity up to a maximum of 8%.*
- *On institutional sites a minimum requirement of 25% of the site area may be required. This may include Natural / Semi-Natural Green Spaces incorporating the planting of native species and pollinator friendly areas which enhance biodiversity up to a maximum of 10%.*
- *In all other cases, public open space should be provided at the rate of 15% of the total site area (at a minimum). This may include Natural / Semi-Natural Green Spaces incorporating the planting of native species and pollinator friendly areas which enhance biodiversity up to a maximum of 6%.*
- *A relaxation of these standards may be considered in smaller developments (less than 8 units) for which a minimum of 10% would be required which includes 4% for biodiversity.*
- *A relaxation of these standards may also be considered on brownfield and / or regeneration sites where higher residential densities are required. On such sites a minimum of 10% would be required which includes 4% for biodiversity*
- *Areas of open space less than 500 square metres will not be taken in charge by the council for maintenance purposes*

It is considered that these requirements for public open space are overly onerous and will end up being detrimental for proposed residential developments brought forward in the future. Of particular concern is the minimum requirement of 20% of lands to be dedicated to open space on greenfield sites.

This open space requirement is completely at odds with National Guidelines, notably, the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas 2009 which states that *"In green-field sites or those sites for which a local area plan is appropriate, public open space should be provided at a minimum rate of 15% of the total site area. This allocation should be in the form of useful open spaces within residential developments and, where appropriate, larger neighbourhood parks to serve the wider community."*

It is not considered appropriate to apply a standard which is not supported by National Guidelines to residential developments on greenfield sites. These overly restrictive measures are not supported by the standards set out in the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas 2009 and will lead to an unsustainable approach to development making residential development unviable in these areas. Table 1 below identifies the national standards set out for Public Open along with the provision outlined in the Draft Kildare Development Plan.

	National Standard	Kildare Standard
Greenfield Residential	15% of site area	20% of site area
Institutional Residential	20% of site area	25% of site area
All other Areas	10% of site area	15% of site area

Table 1 National Standards V's Kildare Draft Plan Standards

Although we recognise that it is necessary to provide public open space as part of residential developments, we believe that providing quality public open space for new developments will have a much greater impact on local communities than requiring quantitative amounts of open space which currently exists and is proposed to be retained in the forthcoming Development Plan.

It is proposed that the forthcoming Development Plan introduces policies in relation to the provision of Open Space and amenity in new residential developments which is aligned with the National Guidelines. As noted in Section 4.18 of the Sustainable Residential Development in Urban Area Guidelines 2009,

Development plans have tended in the past to emphasise detailed quantitative standards, but there is now an increasing focus on the quality of public open space, which ensures that the reasonable expectations of users are more likely to be fulfilled.

We consider that the current 20% open space requirement for new residential development on greenfield sites in the Draft Plan is excessive and will prevent developers from providing residential development in key locations of Kildare County and will further prevent important and strategic lands from being developed.

We consider that providing high quality public open spaces would have a much more positive contribution to areas opposed to the quantitative measures which currently exist and are to be retained in the upcoming Development Plan. Furthermore, given the attainment of higher densities in our cities and towns in recent years in accordance with national guidance, we consider that open spaces should be based on quality opposed to unrealistic and unviable quantities.

It is proposed that the forthcoming Development Plan introduces policies in relation to the provision of Open Space and amenity in new residential developments which is aligned with the National Guidelines. As noted in Section 4.18 of the Sustainable Residential Development in Urban Area Guidelines 2009,

“Development plans have tended in the past to emphasise detailed quantitative standards, but there is now an

increasing focus on the quality of public open space, which ensures that the reasonable expectations of users are more likely to be fulfilled."

Quality public open spaces will greatly improve residential areas throughout Kildare County and consideration should be given by the Local Authority to providing a greater degree of flexibility in the approach taken to public open space development standards which moves towards a qualitative method in the forthcoming Development Plan. This in turn will allow developers to provide traditional housing which overlooks high quality, useable, public open spaces and allow Kildare to meet their housing targets throughout the lifetime of the Development Plan.

Proposed Amendments to the Draft Plan on Open Space

We submit that Section 15.6.6 of the Kildare County Development Plan be amended in relation to the provision of Open Space and be updated to be consistent with National Guidelines in relation to design and the percentage of open space required for all new residential development in Kildare County as follows:

- *On greenfield sites, the minimum area of open space that is acceptable within the site is ~~20%~~ 15% of the total site area. This may include Natural / Semi-Natural Green Spaces incorporating the planting of native species and pollinator friendly areas which enhance biodiversity up to a maximum of ~~8%~~ 6%.*
- *On institutional sites a minimum requirement of ~~25%~~ 20% of the site area may be required. This may include Natural / Semi-Natural Green Spaces incorporating the planting of native species and pollinator friendly areas which enhance biodiversity up to a maximum of ~~10%~~ 8%.*
- *In all other cases, public open space should be provided at the rate of ~~15%~~ 10% of the total site area (at a minimum). This may include Natural / Semi-Natural Green Spaces incorporating the planting of native species and pollinator friendly areas which enhance biodiversity up to a maximum of ~~6%~~ 4%.*
- *A relaxation of these standards may be considered in smaller developments (less than 8 units) for which a minimum of 10% would be required which includes 4% for biodiversity.*
- *A relaxation of these standards may also be considered on brownfield and / or regeneration sites where higher residential densities are required. On such sites a minimum of 10% would be required which includes 4% for biodiversity*
- ~~*Areas of open space less than 500 square metres will not be taken in charge by the council for maintenance purposes*~~

2.2.2 Dwelling Design

Table 0.3 of the Draft Plan outlines the minimum requirements for storage and floor areas for dwellings with four or more units. These standards are considered excessive in relation to the requirements set out by the guidance in the Quality Housing for Sustainable Communities.

Unit Type (House)	Floor Area	Storage Area	Minimum Private Open space
One bedroom	55m ²	3m ²	48m ²
Two Bedroom	85m ²	6m ²	55m ²
Three Bedroom	100m ²	9m ²	60m ²
Four Bedroom	110m ²	10m ²	75m ² *

Figure 4: Table 0.3 of the Draft Plan

There are significant differences between the required minimum floor areas and minimum storage areas as set out in the Quality Housing for Sustainable Communities in comparison to the Draft Kildare County Development Plan.

DWELLING TYPE	TARGET GROSS FLOOR AREA (m ²)	MINIMUM - MAIN LIVING ROOM (m ²)	AGGREGATE LIVING AREA (m ²)	AGGREGATE BEDROOM AREA (m ²)	STORAGE (m ²)
Family Dwellings - 3 or more persons					
4BED/7P House (3 storey)	120	15	40	43	6
4BED/7P House (2 storey)	110	15	40	43	6
4BED/7P House (1 storey)	100	15	40	43	6
4BED/7P Apartment	105	15	40	43	11
3BED/6P House (3 storey)	110	15	37	36	6
3BED/6P House (2 storey)	100	15	37	36	6
3BED/6P House (1 storey)	90	15	37	36	6
3BED/6P Apartment	94	15	37	36	10
3BED/5P House (3 storey)	102	13	34	32	5
3BED/5P House (2 storey)	92	13	34	32	5
3BED/5P House (1 storey)	82	13	34	32	5
3BED/5P Apartment	86	13	34	32	9
3BED/4P House (2 storey)	83	13	30	28	4
3BED/4P House (1 storey)	73	13	30	28	4
3BED/4P Apartment	76	13	30	28	7
2BED/4P House (2 storey)	80	13	30	25	4
2BED/4P House (1 storey)	70	13	30	25	4
2BED/4P Apartment	73	13	30	25	7
2BED/3P House (2 storey)	70	13	28	20	3
2BED/3P House (1 storey)	60	13	28	20	3
2BED/3P Apartment	63	13	28	20	5
1BED/2P House (1 storey)	44	11	23	11	2
1BED/2P Apartment	45	11	23	11	3

Figure 5 Space provision and room sizes for typical dwellings

The maximum storage required for a dwelling house in the Quality Housing for Sustainable Communities is 6sqm however, Kildare County Council requires 9sqm for a 3-bed dwelling and 10sqm for a 4-bed unit. Similarly, the floor areas have up to 17 sqm of a difference between floor areas for 3 bed units as demonstrated in Figure 6 below.

House Type	Floor Area		Storage Requirement	
	Kildare	Nationally	Kildare	Nationally
1 bed	55 sqm	44 sqm	3 sqm	3 sqm
2 <u>bed</u>	85 sqm	70-80 sqm	6 sqm	4 sqm
3 <u>bed</u>	100 sqm	73-100 sqm	9 sqm	6 sqm
4 <u>bed</u>	110 sqm	105-110sqm	10 sqm	6 sqm

Figure 6: Comparison of floor area and storage area requirements between Kildare County Development Plan and the Quality Housing for Sustainable Communities

In line with the Quality Housing for Sustainable Communities, a more flexible merit-based approach to minimum floor areas and storage requirements should be adopted by the Local Authority in line with National guidance. The removal of onerous requirements on floor and storage areas would enable the wider strategic aims of the Kildare County Development Plan and National Planning Framework to be achieved and ensure delivery of a greater number of quality affordable homes with sufficient floor areas and suitable storage facilities, in line with greater housing output targets.

Section 15.4.6 of the Draft Plan also outlines the minimum requirements for private open space requirements for new dwellings. In the interests of compact growth, it is considered that 60sqm should be the maximum requirement for dwellings of 3-bedrooms or more.

Proposed Amendments to the Draft Plan on Dwelling Design

We consider that the dwelling size and storage size outlined in the Draft Development Plan are excessive in comparison to the standards set out in the Quality Housing for Sustainable Communities and that Table 0.3 should be amended as follows:

Unit Type	Floor Area	Storage Area	Minimum Private Open Space
One Bedroom	55 sqm 45sqm	3 sqm	48 sqm
Two Bedroom	85 sqm 70sqm	6 sqm 4sqm	55 sqm
Three Bedroom	100 sqm 75sqm	9 sqm 6sqm	60 sqm
Four Bedroom	110 sqm 105sqm	10 sqm 6sqm	75 sqm 60 sqm

2.2.3 Car Parking

The car parking standards proposed in Chapter 15 of the Draft Kildare County Development Plan reflect a significant change to standards outlined in the current 2017 Kildare County Development Plan.

The maximum car parking standards proposed in Table 0.9 of the Draft Kildare County Development Plan for dwelling houses reflect a significant departure from the standards that are currently in place in the County. While our client supports sustainable modes of transport, the Local Authority should consider that in several locations within Kildare, public transport services are not widely and regularly available.

Development	Spaces Required in Current Plan	Spaces Required Draft Plan
House	2 spaces per unit	1 space each for units up to and including 3 bed units and 1 space + 0.5 visitor spaces for units of 4 units or greater

We would like to highlight that the timeframe for the Development Plan is 2023 through to 2029. The National Transport Authorities Draft Transport Strategy for the Greater Dublin Area, which is the framework for investment in transport infrastructure and services over the next two decades, extends to 2042 and as such prolongs beyond the 2029 timeframe for this Development Plan.

As part of the Development Plan process, it is important that the Local Authority implements a “step down” approach to the “norm” of 2 no. parking spaces per dwelling until such time that suitable alternative modes of transport are in place within the towns of Kildare County. As outlined, sustainable transport options are supported and encouraged by our client, however, planned improvements to the public transport network are required to be delivered and available to residents to achieve a sustained modal shift in how people travel to work, school and social facilities.

We consider that the lack of transitional arrangements which have regard to the actual delivery of public transport will potentially impact the rate at which compact growth can be delivered in some part of the County. We consider that transitional arrangements could be implemented as part of the new Development Plan which would provide flexibility and support for new residential development in line with a comprehensive Mobility Management Plan that provides for innovative solutions to address this transitional period.

The proposed car parking standards will result in the maximum car parking spaces achievable on residential sites for dwellings house, representing in nearly a fifty percent decrease than the current standard set out for residential dwellings. While Glenveagh Properties Ltd. are supportive of the planned improvements to the public transport network for Kildare County, the proposed reduction in car parking standards is being implemented well

in advance of these improvements. This level of change will be unsustainable to support growth to achieve targets set out in the Core Strategy and will prevent the development of strategic sites.

We recognise with the delivery of the improvements to public transportation envisioned for Kildare County, the car parking requirements in the future will decrease over time. In some areas of the County, the impact of the delivery will be more quickly realised, however in other areas of the County area there is going to be a need for car parking for residential dwellings until such time as these improvements are realised that there is a genuine need for car parking in excess of the levels being proposed in the Draft Plan.

Proposed Amendment to the Draft Plan on Car Parking Provision

We consider that the maximum car parking standards set out in the Draft Plan are unrealistic until such time that alternative modes of transport are implemented by the Local Authority. The severe reduction in car parking standards will encourage unauthorised car parking within residential developments and in turn result in traffic accidents.

We therefore request that Table 0.9 of the Draft Kildare County Development Plan be amended for car parking for residential houses as follows:

Residential	Proposed Amendment to Draft Plan
House	1 space each for units up to and including 3 bed units and 1 space + 0.5 visitor spaces for units of 4 units or greater 2 spaces per unit

2.2.4 Sustainable Urban Drainage Systems (SuDS)

We note that the policies and objectives in relation to Sustainable Urban Drainage Systems (SuDS) have been updated in the Draft Development Plan to facilitate greater integration of these measures into the design of new residential development.

We consider that some of the measures being proposed in Section 15.8 of the Draft Plan are overly restrictive in terms of how and where storm water management is provided for in new residential development schemes.

Proposed Amendment to the Draft Plan on SuDS

We submit the following amendment to Section 15.8 of the Draft Development Plan:

All planning applications for developments shall include proposals for the following:

- Detailed proposals for the management of surface water, where Nature Based Surface Water Management solutions

are considered and prioritised in the first instance. Groundwater monitoring, if required, should last at least 6 months and include at least one winter season.

- A Surface Water Management Plan shall be submitted which includes details inter alia the location, design and any future maintenance proposals / procedures required to maintain the surface water management system.

- Proposals for surface water management shall be in compliance with the Greater Dublin Drainage Strategy (GDDSDS), in particular Volume 2 Chapter 6 Stormwater Drainage Design Criteria, and CIRIA SuDS Manual (C753).

- In the event that a Nature Based Surface Water Management solution is not feasible, detailed information must be submitted to explain why it was not considered to be a practical solution. Traditional drainage systems will only be permitted where a demonstrable exceptional circumstance has been provided.

- Sustainable Drainage Systems *when included in areas of* ~~should not form part of the public open space provision, except where they~~ *should be sensitively integrated and* contribute in a significant and positive way to the design and quality of open space. In instances where the Council determines that SuDS make a significant and positive contribution to open space, a maximum 10% of the open space provision shall be taken up by SuDS.

~~- In the event that underground attenuation storage structures are required, they will not be accepted under areas of public open space, save in exceptional demonstrable situations.~~

- All existing site watercourses shall be retained and existing site pipework should be "de-culverted" where feasible.

3. Summary

On behalf of our clients, we would be grateful if this submission could be given careful consideration during the preparation of the upcoming development plan. We consider that the under provision of new units in the Draft Kildare County Development Plan will create a long-term deficit in housing in the County if they are not addressed in the Draft Plan. We consider that this must be addressed prior to the adoption of the Plan so that impacts of a shortfall in housing supply, which are already indicated in the higher than average household size and lower headship rates, are accounted for and are not allowed to continue.

The main points included in this submission are summarised as follows:

- The Core Strategy needs to be updated to:
 - Reflect a higher level of growth than originally outlined in policy documents.
 - Acknowledge that the County's average household size and lower than average headship rates are clear indicator of an existing under provision in the County.
 - Align with the average target household size for the State of 2.5 in 2040.
 - Include a frictional vacancy rate of 5.9% to housing targets.
- The dwelling target of 9,144 units be updated to **17,607 units** to reflect actual minimum number of units required to accommodate the population during the lifetime of the Development Plan.
- Development Standards should be updated to align with National Guidelines. The imposition of onerous development standards will have implications on the overall viability of development proposals. In particular the onerous and overly prescriptive standards relating to open space requirements for new development, dwelling design, car parking and SuDs, etc.

We respectfully request that the planning authority give consideration to the strategic issues raised in this submission and we trust that our submission will be taken into account as part of the consultation process for the review of the upcoming Development Plan.