



TECHNICAL REVIEW OF THE PLANNED PROVISION FOR HOUSING

# Submission to Draft Kildare County Development Plan 2023-2029

May 2022

**Turley**

# Executive Summary

1. Turley has been commissioned by a consortium of housebuilders<sup>1</sup> to undertake a technical review of the planned provision for housing in the draft Kildare County Development Plan 2023-2029.
2. This submission is in response to significant concerns from our clients – who have collectively been responsible for delivering in excess of **3,000 homes** in the County<sup>1</sup> over the past five years – that the proposed target of providing around 9,144 homes to the end of 2028, and the responding approach to housing provision, is insufficiently ambitious. It fails to adequately address a worsening national and local housing crisis.
3. Our clients believe that the need for new homes in the County is greater than the Draft Plan suggests. If adopted in its current form, it will restrict the industry from providing the homes that are required to meet the needs of local households now and in the future.
4. To address the deficiencies identified in this report **the Plan must zone lands of a sufficient quantum** to ensure the required level of flexibility to pro-actively plan for the increasing local housing need beyond the proposed housing target. **This zoned supply must be based on a robust evidenced assessment of urban capacity, reflect the settlement hierarchy set out in the Regional Spatial and Economic Strategy (RSES) and provide reasonable choice to the development industry.**
5. This report substantiates these conclusions, confirming that:
  - **There is a national housing crisis**, manifest in prices which have risen by 10% in the last year and resulting in substantially worsening affordability issues, impacting new households and those in most acute need.
  - **The failure to supply the homes needed at a national level has contributed to this crisis.** The government requires a rapid increase in house production. This forms a critical context to the need for proactive and positive planning from those areas, such as Kildare, where demand is strongest and there is a demonstrable track record of delivery.
  - **Addressing the consequences of this national crisis will require development rates to far exceed the targets enshrined within the NPF.** This reflects the outdated nature of the informing projection modelling, the underestimating of the full scale of pent-up demand and stronger drivers of future demographic and economic demand.



in excess of  
**3,000 homes**  
in the County

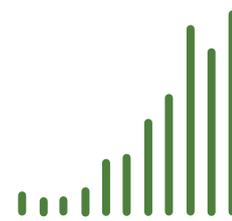


**10%** rise in house  
prices last year

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<sup>1</sup> Glenveagh Properties plc, Cairn Homes plc, O'Flynn Group and Ballymore

- The use, within this context, of the nationally provided DHLGH estimates of projected need within **the proposed housing target for Kildare will only curtail recently stronger levels of housing provision**. Over 2,000 homes were delivered last year, for example, demonstrating the strong demand for new homes and the industry's ability to respond if allowed to do so. **Our clients are facing the very real prospect of having to close existing house construction sites and mothball the opening of new 'shovel ready' sites because they might exceed artificially derived 'housing target numbers' dictated by the DHLGH**
- The Draft Plan also represents **a regressive step when compared with the current Kildare County Plan 2017-2023, and indeed earlier Plans, which identified a need for more than 2,000 homes per annum** that has been rarely met despite a recent rise in delivery rates. Downgrading the target for new housebuilding in the context of a national and local housing crisis is inexplicable.
- **Kildare is not immune from the national housing crisis**. Prices have risen to the point where the average home cost €346,389 last year, 7% higher than in the year before. This will have only exacerbated a situation where households on average incomes already struggle to afford average prices.
- **Stronger than expected population growth has been a driver of demand for housing in Kildare**. The County had an estimated 247,413 residents as of 2020, some 11,500 more than anticipated by the ESRI projections that underpin the proposed housing target and already exceeding its forecast for 2023. There is every sign that this strong population growth will continue.
- **Failing to plan for this population growth would not only perpetuate the local housing crisis but also compromise the provision of infrastructure and key services**. The HSE and the Department of Education rely on the County Development projections to plan for healthcare and schools. Irish Water, the ESB, TII and the NTA rely on these forecasts for their capital budgets for water services, power supply, roads and public transport.
- **One consequence of historic undersupply, namely pent-up demand from households unable to form independently, only adds to the future need for housing**. This has not been adequately taken into account in proposing a housing target that implicitly and inexplicably assumes that household sizes in the County will at no point fall below even the current state average, despite being a damning reflection of the local housing crisis. Failing to recognise and respond to this issue implicitly accepts that younger households in the County will not be able to enter the housing market, and would only perpetuate existing conditions.



**7%** rise in house prices in the last year

Population already **5%** larger than projections anticipated

An implicit assumption that Kildare households will **keep being larger** than the current state average

- **The Department’s focus on compact growth and prioritisation of urban development lands implicitly assumes an increase in the provision of smaller apartment schemes**, which will self-evidently accommodate smaller households. If the intention is to increase the supply of smaller units, then more units are needed.
- **Strong population growth in Kildare has coincided with strong economic performance**, with a substantial number of new jobs having been created and proven to be attractive to younger people. The Draft Plan clearly aims to sustain this trend and businesses’ recent investments suggest that this will be achieved, **but the availability of labour will be a key factor when businesses decide whether to invest**. Providing enough homes to accommodate demand from a growing labour force will be vital to achieving the stated objective of reducing unsustainable out-commuting, not least given the likelihood of continued economic pressure from Dublin.
- The Draft Plan **is fundamentally flawed** as it **fails to respond to legislative requirements**, including **Sections 10 and 95** of the Planning and Development Act 2000 (as amended) and updated **Ministerial Guidelines** (see Table 5.1 of the Report).
- The Draft Plan **fails to evidentially assess the deliverability of zoned land** and **does not explain how sufficient land will be zoned across the higher order settlements**.
- The Draft Plan is **missing a key required component** to inform its Core Strategy and Settlement Strategy/Hierarchy, this being a **comprehensive Settlement Capacity Audit**.
- **Reliance by the Draft Plan on a suite of outdated Local Area Plans** to zone the land required to deliver new homes over the plan period is an obvious **risk to housing supply**.
- A **further risk** to housing supply is the Draft Plan’s approach to **Development Management Standards** which are **onerous** when compared with the **national guidelines for planning authorities**.
- **A more positive plan-led approach could be taken by the County**. The draft Fingal Plan adopts such an approach for example, appearing to make a more realistic allowance for pent-up demand in its calculation of need before identifying a more flexible supply of land.



**13%** increase in jobs between 2011 and 2016, the second highest of 31 local authorities in the state

6. It is abundantly clear that **a more positive approach is required** to both acknowledge the scale of housing need in Kildare and provide a deliverable and flexible supply of land to meet it. The Plan simply must zone new housing land to provide the market with the opportunity to keep building on recent success, avoid any further worsening of affordability and sustainably achieve the County’s economic aspirations.

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**Client**  
Consortium of House Builders

**Our reference**  
GLEX3001

# 1. Introduction and Scope

- 1.1 Turley has been commissioned by a consortium of housebuilders<sup>1</sup> (hereafter ‘our clients’) to undertake a technical review of the planned provision for housing in the draft Kildare County Development Plan 2023-2029 (‘the Draft Plan’).
- 1.2 This is in response to significant concerns from our clients that the proposed housing supply target of approximately 9,144 homes to the end of 2028 and the responding approach to the planned provision for housing is insufficiently ambitious and fails to respond positively to the consequences of a worsening national and local housing crisis.
- 1.3 Our clients believe that the need for new homes in the County is greater than the Draft Plan suggests. If adopted in its current form, it will restrict the industry from providing the homes that are required to meet the needs of local households now and in the future.. **Our clients are greatly concerned they will have to close some sites and mothball other ‘shovel ready’ sites to conform with the Plan as it is currently drafted.**
- 1.4 **The Draft Plan is fundamentally flawed as it fails to respond to legislative requirements, including Sections 10 and 95 of the Planning and Development Act 2000 (as amended), and updated Ministerial guidelines, as outlined further in Section 5, particularly Table 5.1.**
- 1.5 This report draws on the evidence published by Kildare County Council (‘the Council’) in the form of the Housing Need & Demand Assessment (HNDA) – an appendix to the Draft Plan – as well as other available published research and local housing market datasets to provide an evidential basis for these concerns.
- 1.6 The report concludes that a more positive approach is required to both acknowledge the full scale of the need and demand for housing and provide a deliverable and flexible supply of land to accommodate it. Critically the Plan must zone new housing land to provide the market with the opportunity to keep building on recent strong rates of housing delivery, avoid exacerbating already worsening affordability issues and ensure that the County’s economic aspirations can be sustainably achieved.

## The consortium of housebuilders

- 1.7 This submission is made on behalf of four housebuilders who have provided a significant number of the new homes delivered in Kildare in recent years, Glenveagh Properties plc, Cairn Homes plc, O’Flynn Group and the Ballymore Group.
- 1.8 Between them they have been responsible for delivering **in excess of 3,000 homes** in the County over the last 5 years (to end of 2022). These are now home to a broad range of households across the settlements of Kildare. Their construction has also served to create important jobs for local residents and helped to support the wider economy by accommodating a growing labour-force.

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<sup>1</sup> Glenveagh Properties plc, Cairn Homes plc, O’Flynn Group and Ballymore

## Report structure

1.9 Evidence is presented within this report using the following structure:

- **Section 2: Planning for housing growth in Kildare** – a summary of the proposed approach to housing provision in the Draft Plan and the claimed justification. Comparison is made with the more positive approach being advanced within the emerging Draft Fingal Development Plan.
- **Section 3: A growing national housing crisis** – a summary of the evidence substantiating the widely recognised national housing crisis and the deficiencies in the current national plan-led response.
- **Section 4: Evidence of higher local housing demand and need** – presentation of evidence affirming the current and future demand and need for homes locally, and the extent to which this exceeds the level implied by the proposed housing target.
- **Section 5: The proposed supply response** – a review of national legislative and guideline requirements for Development Plans highlights a flawed approach to meet the identified demand and need for new housing which is further exacerbated by the vulnerabilities of the proposed supply of housing land as illustrated by reviewing the status of Local Area Plans across the county and by considering the Plan’s proposed Development Management Standards, where these exceed national guidelines requirements.
- **Section 6: The consequences of failing to plan positively** – the supporting evidence published by the Council affirms the real issues facing many households in the County in accessing the housing they need. The existing and future consequences of failing to adopt a more positive approach in the planning for new housing are illustrated, with a specific focus on issues relating to affordability and economic investment.
- **Section 7: Conclusion and recommendations** – this final section draws on the preceding technical analysis to arrive at a clear set of conclusions and recommendations for the Council to ensure that the Plan provides a more positive response to the severity of the housing market challenges facing the County.

## 2. Planning for housing growth in Kildare

### The Kildare Draft County Development Plan – planning for housing

2.1 In setting out its strategy for housing, the Draft Plan acknowledges that:

*“The delivery of quality homes and sustainable communities for County Kildare is a key and cross-cutting issue in ensuring that the county remains competitive as a place to live and invest in”<sup>2</sup>*

2.2 With regards to the overall provision of housing, the Draft Plan proposes a target of 9,144 homes over the plan period (to 2028). The calculation behind the target is presented at Table 2.4 of the Draft Plan and replicated below.

**Table 2.1: Methodology used to determine the housing target**

Step	Source	Calculation
1	Housing demand 2020-2031 <sup>3</sup>	18,425
2	CSO – dwelling completions for 2020	- 1,661 <sup>4</sup>
		<b>= 16,764/11<sup>5</sup></b>
3	Annual housing completions target for Kildare 2021-2031 <sup>6</sup>	= 1,524 x 8 <sup>7</sup>
		<b>= 12,192</b>
4	Housing completion estimates for 2021 and 2022	-3,048 <sup>8</sup>
<b>5</b>	<b>CDP housing target to end of plan period</b>	<b>= 9,144</b>

Source: Table 2.4 of the Draft Plan

2.3 The “housing demand” input at Step 1 is evidently a key input to the concluded target. The Draft Plan also confirms the source of this figure, and summarises its calculation, at Table 2.3 which is similarly replicated overleaf.

<sup>2</sup> Section 3.2 Strategy

<sup>3</sup> Housing Supply Target Methodology for Development Plan (Dec 2020)

<sup>4</sup> CSO NDQ 06 Official Statistics

<sup>5</sup> 2021-2031

<sup>6</sup> 11 full calendar years

<sup>7</sup> 8 full calendar years from Q1 2021 – Q4 2028 just before this plan expires in Q1 2029

<sup>8</sup> 12,192 / 8 (8 full years) x 2 (2021 and 2022 completion estimates)

**Table 2.2: Calculated housing demand for Kildare 2020 - 2031**

Kildare County Council	Annual average	Total households
A. ESRI NRF scenario projected new household demand 2017 – 2031	1,483	22,238
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
<b>Housing demand 2020-31 = total (columns A-B+C)/12</b>	<b>1,535</b>	<b>18,425</b>

Source: Table 2.3 of the Draft Plan

2.4 The Draft Plan proceeds to assert, within its Core Strategy Statement, that:

*“Having regard to SPPR DPG 6 of the Draft Development Plan Guidelines, it is considered that the above approach is consistent with the National Spatial Strategy and the Regional Economic and Spatial Strategy and moreover takes into account the more recently published Housing Supply Target (HST) Methodology for Development Planning (December 2020)”<sup>9</sup>*

2.5 It is accepted that the housing demand figure has been drawn from the Housing Need & Demand Assessment (HNDA) which is acknowledged to have been prepared in compliance with the relevant national guidance as published in April 2021<sup>10</sup>. More detailed consideration is given to the HNDA in subsequent sections of this report, specifically in section 4, but it is of immediate note that the input level of housing demand is directly aligned with the outcome of the “NPF 50:50” convergence scenario which is one of a number of scenarios that are modelled and presented in the HNDA. Whilst this ostensibly ensures consistency and alignment with the National Planning Framework (NPF) and the National Spatial Strategy it is nonetheless clear – as we set out in the following section – that this national plan is increasingly unlikely to provide the positive planning approach that is required to address the growing national housing crisis.

2.6 In order to inform the strategy for providing for the quantified need the Draft Plan proceeds to outline the settlement hierarchy at Table 2.8, proposing a distribution of the proposed target of 9,144 homes between the larger towns. It is of note that this distribution is identical to the 2017-2023 Development Plan<sup>11</sup>, and so fails to reflect the settlement hierarchy since set out in the Regional Spatial and Economic Strategy (RSES) which identified Maynooth and Naas as the two Key Towns in the County and supported the concentration of growth within these two towns and within the MASP area (Maynooth and Leixlip).

<sup>9</sup> Section 2.13 Core Strategy Statement

<sup>10</sup> Guidance on the Preparation of Housing Need and Demand Assessment, DHLGH, April 2021

<sup>11</sup> Kildare County Development Plan 2017-2023, Table 3.3

2.7 The Draft Plan nonetheless translates its distribution of growth into a proposed requirement for residential land zoning. Key information from this table is replicated in the table overleaf.

**Table 2.3: Housing Unit / Zoning targets 2023 - 2028**

Settlement Type	Settlement Name	Housing & Population Target (%)	Housing Target (total 9,144)	Residential Zoned Land Requirement (ha)
Key Town	Naas	14.9%	1,362	40
	Maynooth (MASP)	10.9%	997 <sup>12</sup>	
Self-Sustaining Growth Towns	Newbridge	11.6%	1,061	35
	Leixlip	10.2%	933	31
	Kildare Town	4.7%	430	14
	Athy	4.8%	439	15
Self-Sustaining Towns	Celbridge	10.0%	914	30
	Kilcock	4.0%	366	12
	Monasterevin	2.6%	238	8
	Clane	2.4%	219	7
Towns	Sallins	1.9%	174	6
	Kilcullen	2.5%	229	8
	Kill	1.3%	119	4
	Prosperous	1.0%	91	3
	Rathangan	0.9%	82	3
	Castledermot	0.5%	46	2
	Derrinturn	0.6%	55	2
Villages	19 listed	4.7%	366	
Rural Settlement	19 listed	1.5%	137	
Rural Dwellers		8%	732	
Blessington Environs		1%	91	
<b>Total</b>		<b>100.0%</b>	<b>9,144</b>	<b>220</b>

Source: Adapted Table 2.8 of the Draft Plan

<sup>12</sup> Additional population allocation for Maynooth of up to 10,000 persons from redistribution of NPF City and Suburbs allocation (EMRA, July 2020). The precise allocation that will be attributed to Maynooth will be determined at LAP stage on foot of detailed assessments and audits of available social and physical infrastructure.

- 2.8 No further proposals regarding the scale of land to be provided for through zoning are made within the Draft Plan. Indeed the Draft Plan itself does not quantify the total land needed. Table 2.3 of this report sums the zoned land requirement for each settlement to 220 ha. The omission of a total, however, presumably reflects the decision not to quantify the amount of land needed in Maynooth or in settlements below the town level, but nonetheless means that there is a need – based on the Council’s own logic – for *more* than 220 ha of housing land.
- 2.9 In limiting its consideration of the need for land to Table 2.8 – summarised above – the Draft Plan appears to be advocating an approach which seeks to provide a quantum of land that is directly aligned with the calculated need, based on the output of the housing supply calculation.
- 2.10 The analysis presented in sections 3 and 4 of this report respectively emphasises the severity of the national and local housing crises. It shows that the true scale of the need for housing over the period to be covered by this Plan is likely to be much higher. In this context, advocating such a restrictive approach risks further exacerbating the challenges resulting from supply falling short of demand.
- 2.11 This risk, and the likelihood of adverse consequences from such an approach, is also emphasised when considering the challenges associated with relying on existing identified land zonings of the largely outdated Local Area Plans. This is considered in section 5 and reinforces the need to adopt a more proactive approach to identifying a supply of zoned land which will ensure flexibility in delivery and enable higher levels of demand to be accommodated where it is generated.

### **Previous local planning context**

- 2.12 The limitations of the proposed approach to planning for new housing are also apparent when compared with the existing Plan.
- 2.13 The 2017 – 2023 County Kildare Development Plan identified a need to provide 6,023 homes over the remaining three years of its plan period (2020, 2021 and 2022)<sup>13</sup>. This appears to equate to a need for circa 2,000 homes per annum.
- 2.14 It also identified a need for an additional 8,038 homes over the four remaining years to 2026 (the time covered by the growth projections). This would again represent a need to provide just over 2,000 homes each year, over a period that is only two years shorter than is now to be covered by the new Plan.
- 2.15 It is of note that the current Plan was clear to state that this level of need was *‘considered to be a sustainable rate of growth and reasonable rate of housing delivery’*<sup>14</sup>.
- 2.16 As this report demonstrates through a consideration of completions in section 4, it is certainly true that the County has successfully delivered at a level that approaches or exceeds this level of need in two of the last three years. In the context of an

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<sup>13</sup> Variation (No. 1) of the Kildare County Development Plan 2017 – 2023, Footnote 6

<sup>14</sup> *Ibid*

acknowledged shortage of housing to satisfy demand, an approach which would serve to curtail delivery appears fundamentally at odds.

- 2.17 Furthermore, despite sustained evidence of strong demographic and economic growth pressures, the trend of lowering delivery expectations goes even further back. The Kildare County Development Plan 2011-2017 established population and housing targets for the period 2006 to 2022 (the current year). These targets are shown in Table 2.4 below.

**Table 2.4: Housing Targets for County Kildare**

	Housing Units
Increase 2006-2016	24,908 (2,490 units / yr)
Increase 2016-2022	18,729 (3,122 units / yr)

*Source: Kildare County Development Plan 2011 - 2017, Table 2.3*

- 2.18 It is of note that this Plan identified a need to deliver over 3,000 homes a year in the County over the last 6 years. Whilst delivery has been increasingly strong it has not met this level of need. This presents an important context in considering the contribution of supply failing to meet assessed need in full in the worsening of affordability over this period, considered further in sections 4 and 6 of this report.

### **An alternative approach: a positive plan-led approach in the Fingal Development Plan**

- 2.19 While it is understood that the Department of Housing, Local Government and Heritage (DHLGH) expects conformity with its estimates of projected housing need<sup>15</sup>, it is of note that other nearby planning areas are, through their own emerging Plans, taking a more positive approach to identifying a supply of land which will meet and exceed these targets.
- 2.20 One such example is the Draft Fingal Development Plan, which was recently subject to consultation. This Plan identified a need for 16,245 homes (2023 Q1 – 2029 Q1), equating to 2,708 homes per annum<sup>16</sup>.
- 2.21 This far exceeds the need for 1,717 homes per annum estimated, over an admittedly different period (2020-31) by the DHLGH in Appendix 1 to the letter referenced above, due to the use of a different approach to accounting for the unmet housing demand arising from 2017. In justifying this variant need figure, the Draft Fingal Plan asserts that:

<sup>15</sup> Letter dated 18 December 2020, Re. Structural Housing Demand in Ireland and Housing Supply Targets, DHLGH

<sup>16</sup> Fingal Development Plan 2023-2029, Table 2.9

*“This final calculation importantly accounts for all of the actual and estimated annual cumulative unmet demand from the period 2017 – 2023 and incorporates this demand surplus into the next Development Plan 2023-2029”<sup>17</sup>*

- 2.22 Furthermore, in providing for the homes quantified as needed, the Draft Fingal Plan identifies around 1,115 ha of zoned land, over five times as much as implied in Kildare by our earlier Table 2.3<sup>18</sup>. The Draft Fingal Plan also importantly suggests that this amount of land could accommodate circa 35,204 homes. Its Table 2.12 proceeds to suggest that an even greater amount of zoned land is allowed for, identifying a total of 1,257 ha in order to allow for the inclusion of strategic reserve sites designed to ensure the potential to deliver additional housing beyond the 6 year life of the Plan. This suggests a significant degree of flexibility, being almost twice as much as the calculated need.
- 2.23 The identification of the zoned land reflects the Council’s analysis of its existing landbank through an urban capacity assessment. This demonstrated that all of the existing lands zoned within Fingal were within the definition of Tier 1<sup>19</sup>.
- 2.24 The Council also recognised, in its proposed approach, the importance of a *‘flexible approach to provide for delivery’...‘to ensure an adequate supply of suitable lands comes forward’<sup>20</sup>*.
- 2.25 Such a level of flexibility will ensure that Fingal is able to keep building homes to respond to higher levels of demand, through the provision of a land supply that enables choice for the development industry and also better allows for the delivery of a range of tenures and types of homes.

### **Summary and implications**

- 2.26 The Draft Kildare Plan proposes a target of 9,144 homes over the plan period (to 2028), predicated on an assessed demand for 1,535 homes per annum and accounting for recent supply. It is acknowledged that this calculation complies with the calculation provided by the DHLHG and aligns with the NPF and the RESS. However, for reasons set out within subsequent sections of this report, it is considered to fail to fully recognise the true scale of demand for housing, specifically shown in evidence of stronger local population growth and the impact of an assumption that household sizes remain unreasonably high.
- 2.27 An examination of adopted and previous Developments Plans for Kildare also emphasises the regressive nature of this target, where it maintains a trend of supposedly reducing need and associated targets for new housing. Where, as this report also considers, the housing market is characterised by the consequences of demand outpacing supply, the downgrading of expectations for housing delivery as opposed to a more positive approach to seek to boost supply is inexplicable.

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<sup>17</sup> Fingal Housing Strategy Draft (2023-2029), page 39

<sup>18</sup> Fingal Draft Development Plan 2023-2029, Table 2.10

<sup>19</sup> *Ibid*, page 46

<sup>20</sup> *Ibid*

- 2.28 The adverse impact of lowering expectations is further exacerbated by the Draft Plan's unjustifiable failure to provide clarity on the quantum of land to be zoned across the County and within individual settlements. This presents a significant risk for those responsible for the delivery of new homes, where certainty and a sufficiently flexible source of land are required.
- 2.29 A review of the approach taken by other nearby authorities, specifically Fingal, reveals that a more positive plan-led approach to boosting housing supply is possible. Here the emerging Draft Plan appears to both acknowledge the possibility of a higher calculated need and propose a more positive approach to the zoning of land, which will ensure significant flexibility for the development industry to respond to.

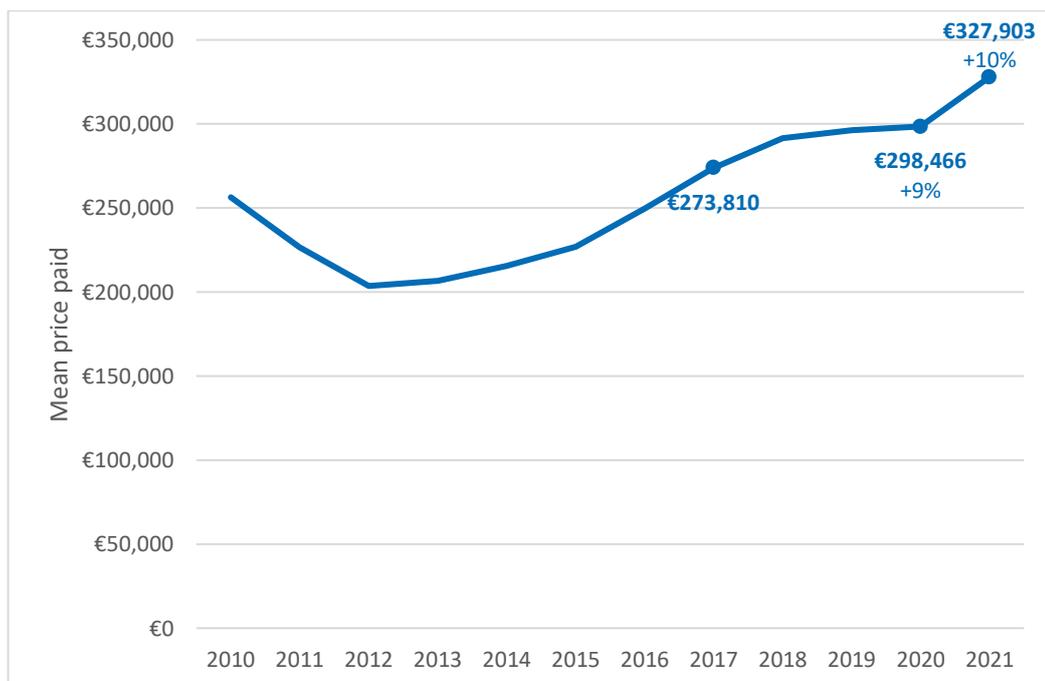
### 3. A growing national housing crisis

- 3.1 The growing national housing crisis represents a critical context in considering the proposed approach to planning for new housing in Kildare.
- 3.2 This section presents an overview of the stark pronouncements regarding the scale and severity of the crisis before considering the response presented by the existing national policy and strategy framework.

#### The scale and severity of the crisis

- 3.3 The population of Ireland grew at an annualised average rate of 1.3% per annum from 1996 to 2016, from 3.6m to 4.7m. The Department’s population projection in 2020, on which the HNDA’s calculation is based, assumed this rate of increase would fall to an average of 0.7% per annum from 2017 to 2031. In fact, the CSO’s latest data estimates the national population was 5.01m in April 2021, implying the rate of population growth has only fallen to 1.1% per annum, despite COVID and other international turbulence. This has huge implications for planning.
- 3.4 This strong population growth is almost certainly a factor behind the continued rise in house prices. CSO data indicates that an average of €327,903 was paid last year<sup>21</sup>. This was some 10% higher than the equivalent figure for 2020, meaning that the mean price paid rose by more in that year than in the previous three combined (9%).

**Figure 3.1: Mean Price Paid in Republic of Ireland (2010-21)**



<sup>21</sup> CSO Table HPA02: Residential Dwelling Property Transactions. Like the Council’s HNDA, this captures the executions of all dwellings bought on the open market by household buyers

Source: CSO; Turley analysis

- 3.5 Market commentary has noted that this price inflation is reflective of ‘soaring demand coupled with constrained supply’, with such sharp rises not having ‘come as a huge surprise given the effect the pandemic has had on the market...and considering the property market entered the pandemic with a supply issue’<sup>22</sup>. Demand is considered to have long been robust due to the strength of Ireland’s labour market, but this has only been exacerbated by a tightening of supply that has led to a record low number of homes being listed for sale, falling some 42% below the pre-pandemic trend in March 2022 and even more sharply down (46%) outside Dublin<sup>23</sup>.
- 3.6 Price rises, reflecting a persistent imbalance between supply and demand, are likely to have only worsened the affordability issues that were already facing tenants and homebuyers. A report produced in late 2020 observed that ‘home affordability has worsened for both...since 2013’, with property and rental prices having both increased faster than households’ disposable income since 2013<sup>24</sup>. Affordability constraints were found to be ‘particularly acute for low-income households’, and especially pronounced in the regions surrounding Dublin. Affordability constraints were noted as being highest in the Mid-East region, of which Kildare is part, with nearly a quarter (23%) of households in the region spending at least 30% of their net disposable income on housing between 2013 and 2016.
- 3.7 The failure to supply the quantum of homes needed has been a clear driver of worsening affordability. Indeed one observer has noted that:
- “In the five years leading up to the pandemic there was just one house built for every additional seven people in the population, substantially less than what’s required”<sup>25</sup>*
- 3.8 The rapidly worsening conditions facing new households looking to enter the housing market and exercise choice evidently requires a proactive and positive policy approach to address the scale of the challenge directly.

### The national policy response

- 3.9 The existence of a housing crisis has not gone unnoticed and the need for a boosting of supply is acknowledged by the DHLGH. Indeed, in the correspondence to the local authorities referenced in the previous section there is an acknowledged need to:
- “...substantially increase national housing output from the current estimated 2020 level of 18,000 – 20,000 homes. This will form an essential part of Ireland’s economic recovery from the Covid-19 pandemic”<sup>26</sup>*

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<sup>22</sup> MyHome.ie Property Report, Q1 2022, p3

<sup>23</sup> *Ibid*, p4

<sup>24</sup> Housing Affordability in Ireland, Economic Brief 061 (December 2020) Maria Jose Doval Tedin and Violaine Faubert

<sup>25</sup> <https://www.irishtimes.com/life-and-style/homes-and-property/no-quick-fixes-eight-ways-to-solve-ireland-s-housing-crisis-1.4570646>

<sup>26</sup> Letter ‘Re. Structural Housing Demand in Ireland and Housing Supply Targets’ (18 December, 2020), DHLGH

- 3.10 It is in this context, as articulated in section 2, that the Irish Government introduced a legislative requirement for an authority’s housing strategy to be consistent with the NPF
- 3.11 The NPF and the Regional Spatial and Economic Strategy (RSES), in the case of Kildare this being the Eastern and Midlands region (EMRA) are intended by the Irish Government to enable this increase in supply. To this end they introduced a legislative requirement for an authority’s housing strategy to be consistent with both documents.
- 3.12 In order for authorities to apply the NPF, the DHLGH commissioned the Economic and Social Research Institute (ESRI) to develop a range of modelled population and household need scenarios. Four scenarios were developed, and are considered further in section 4, but the NPF projection specifically is designed to conform with the NDP spatial strategy and reflect the NPF and RSES population targets to 2040. This scenario suggests demand being generated from just over 28,000 new households per annum, a figure which is elevated to account for unmet demand and homeless households as well as supply to 2019. This results in a calculated demand from just over 33,000 new households per annum, to be met during the period 2020 to 2031.
- 3.13 In accepting this level of assessed need, it is impossible to ignore the fact that the modelling of projected household growth was undertaken in 2017<sup>27</sup>, now five years and indeed almost an entire plan period ago.
- 3.14 Given the increasing severity of the housing crisis and scale of population growth described above, the intervening five years have seen significant changes in the national housing market and the resulting demand for new housing.
- 3.15 While national strategy and the NPF recognise a housing crisis, they have failed to keep pace with the growing severity of this crisis and the increasing underlying demand. As considered below, others now estimate there to be a markedly higher need, such that it is no longer appropriate for local authorities to restrict development rates to align with a national target that is no longer sufficient or providing the homes needed.
- 3.16

### **How many homes are needed to address the crisis?**

- 3.17 The Council’s HNDA references the Housing Market Monitor produced for Q2 2021 by the BPFi, stating that:

*“...given population growth is adding 30,000 units at a minimum each year, coupled with circa 100,000 units of latent demand built up over the past decade, it will take some time before homebuilding can start to address the housing shortage”<sup>28</sup>*

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<sup>27</sup> Housing Supply Target Methodology for Development Planning Guidelines (December 2020), Dept of Housing, Local Government and Heritage, Paragraph 2.1

<sup>28</sup> Appendix 1 to the Plan ‘Housing Need and Demand Assessment & Housing Strategy’ (2022), page 103

- 3.18 Research undertaken by Lyons in 2021 proceeds to quantify the scale of housing need nationally, with specific reference to the scale of need in the Greater Dublin area, concluding:

*“With a population of 6.5 million by mid-century, arranged into households of 2.1 persons on average, and where 0.6% of the existing building stock becomes obsolete each year, the underlying housing need in Ireland is just under 49,000 per year 2016-2051. Of these, roughly 20,000 are likely to be needed in the Greater Dublin Area, given its relative lack of construction in recent decades, leading to the emergence of a ‘Dublin premium’ in housing prices that didn’t exist prior to the 1990s”<sup>29</sup>*

- 3.19 The importance of allowing new households to form was also reported to have been emphasised by the Central Bank deputy governor Sharon Donnery, who suggested that *‘if the number of people living in each house was in line with the EU average, there should be 260,000 more households in Ireland’<sup>30</sup>*. This speaks to the fact that Ireland currently has larger households than the EU average<sup>31</sup> — and even though the NPF cites an expectation that household sizes will reduce to an average of 2.5 persons by 2040, this remains some way higher than the current EU average of 2.3 persons and is larger than recorded in 18 states now<sup>32</sup>. It also jars with the NPF’s desire to make apartments *‘a more prevalent form of housing’* in Ireland, where they are relatively rare in a European context, but this implicitly suggests a shift towards the smaller households that will fit in such accommodation<sup>33</sup>.
- 3.20 The above point to the fact that the scale of provision enabled through the NPF, , will not respond adequately to the full scale of future and pent-up demand. It is therefore imperative that the next generation of Development Plans incorporate a level of flexibility which recognises this higher need context and can match it by building on recent rates of delivery.

## Summary and implications

- 3.21 There is a growing national housing crisis in Ireland. The ongoing failure to provide the number of homes needed to address growing demand, originating from an increasing population and the legacy of a significant level of pent-up demand, are manifesting in ever-worsening affordability issues. These in turn are resulting in increasing numbers of households whose housing needs are not adequately met with the most acute demonstration of this reflected in the unfortunate increase in those reporting as homeless.
- 3.22 It is acknowledged that the DHLGH has sought to provide a policy-led, ‘evidence based’ response to this crisis in the form of the NPF and subsequent housing strategies and investment plans. There is growing evidence and critique, however, that this national

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<sup>29</sup> Institutional Investment and the Private Rental Sector in Ireland (June 2021), Roman C. Lyons, Identify Consulting for Irish Institutional Property, Executive Summary

<sup>30</sup> <https://www.irishtimes.com/life-and-style/homes-and-property/no-quick-fixes-eight-ways-to-solve-ireland-s-housing-crisis-1.4570646>

<sup>31</sup> <https://www.statista.com/statistics/1231406/average-household-size-in-europe/>

<sup>32</sup> *Ibid*; NPF page 95

<sup>33</sup> NPF page 93

policy approach has failed to keep pace with or adequately respond to the increasing severity and scale of the crisis and that the evidence on which policy is based is not robust. Informing modelling upon which the national housing targets rely is now increasingly dated and fails to capture the full implications of pent-up demand and population growth pressures. Indeed, a number of commentators have sought to convey just how far short the NPF's housing targets fall of a more up-to-date and comprehensive assessment of current needs.

- 3.23 The emerging limitations of the national policy response forms an important prism through which to view the proposed restrictive approach within the Draft Plan where its rigid compliance will mean that it too will fail to contribute positively to addressing either the national, or as we consider in the next section, the local housing crisis.

## 4. Evidence of higher local housing demand and need

- 4.1 This section considers the factors shaping the housing market in Kildare, framed in the context of the national housing crisis described in the previous section. In this regard, it is perhaps telling that the Council's HNDA, in summarising its detailed analysis of the local housing market, concludes that the '*evidence shows potential issues in the housing market*'<sup>34</sup>.
- 4.2 The potential for sustained and higher demand for housing has no doubt contributed to these '*potential issues*'. This section considers the changing demographic, economic and market factors driving elevated local demand. Separate consideration is given in section 6 of this report to some of the adverse consequences arising from the recent failure to supply a sufficient number and breadth of homes in Kildare to respond to growing needs, with this being another of the '*issues*' articulated in the HNDA.

### A strong demand context

#### Recent rates of delivery

- 4.3 The HNDA comments on the rate of housing delivery in Kildare, highlighting that as many as 1,898 homes had been completed in a single calendar year since 2011<sup>35</sup>. It was, however, unable to draw upon complete data for 2021 which is now available to confirm that last year set a new high of some 2,032 dwellings, around 7% higher than the previous peak<sup>36</sup>. This was notably also some 22% higher than the previous year, with this marked step-up contrasting with the trend throughout the state where the rate of delivery was merely sustained last year and indeed slightly fell by 0.2%.

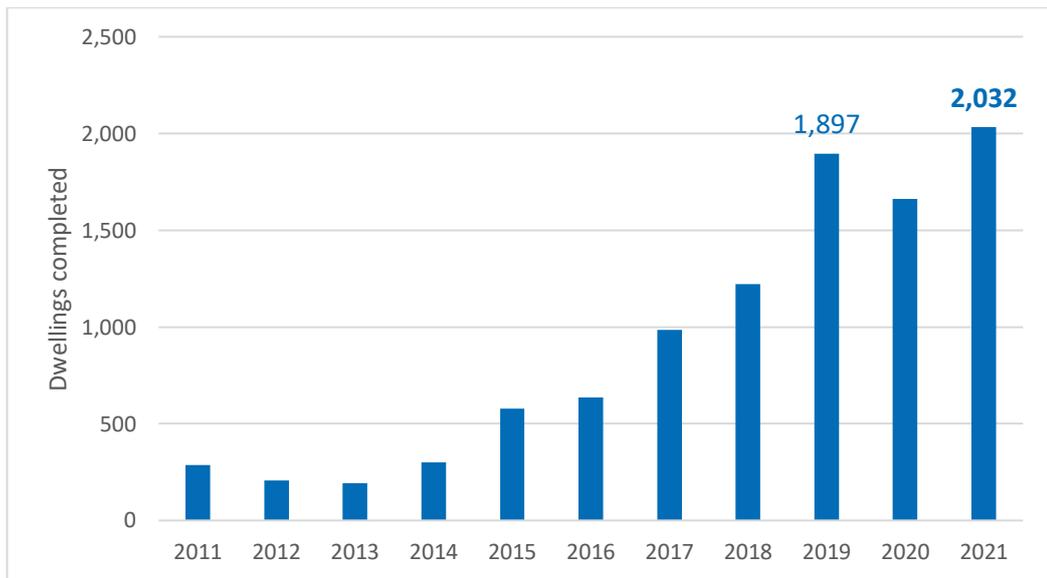
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<sup>34</sup> Appendix 1 to the Plan 'Housing Need and Demand Assessment & Housing Strategy' (2022), Executive Summary pg viii

<sup>35</sup> Draft Kildare Development Plan (2022), Section 4.2.1

<sup>36</sup> CSO Table NDQ05 – New Dwelling Completion

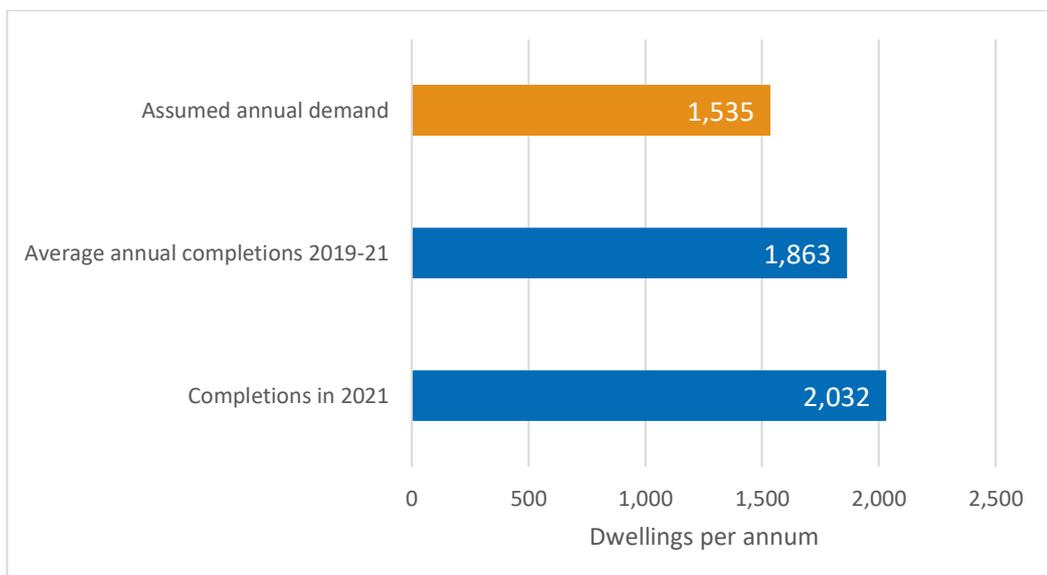
**Figure 4.1: Housing Completions in Kildare (2011-21)**



Source: CSO

- 4.4 The housing target proposed in the Draft Plan is ultimately underpinned by an assumption that there will be demand for only 1,535 homes per annum, totalling 18,425 over twelve years from 2020 to 2031, but more recent levels of completions shown above suggests that demand has been operating at a markedly higher level.
- 4.5 There has evidently been sufficient demand to enable the delivery of 21% more homes over the past three years, in which an average of 1,863 dwellings have been completed annually. Delivery last year exceeded this benchmark by nearly one third (32%).

**Figure 4.2: Benchmarking Assumed Demand against Delivery**



Source: CSO; Turley analysis

4.6 The input average need of 1,535 homes per annum therefore assumes, with insufficient justification, that demand will reduce by nearly a fifth (18%) from its recent rate. Looking at longer-term drivers of demand in this section there is no evidence to suggest that there will be a reprieve in the need pressures for new housing and therefore where the market has proven itself capable of delivering higher level of housing an approach which will curtail delivery is unjustifiable.

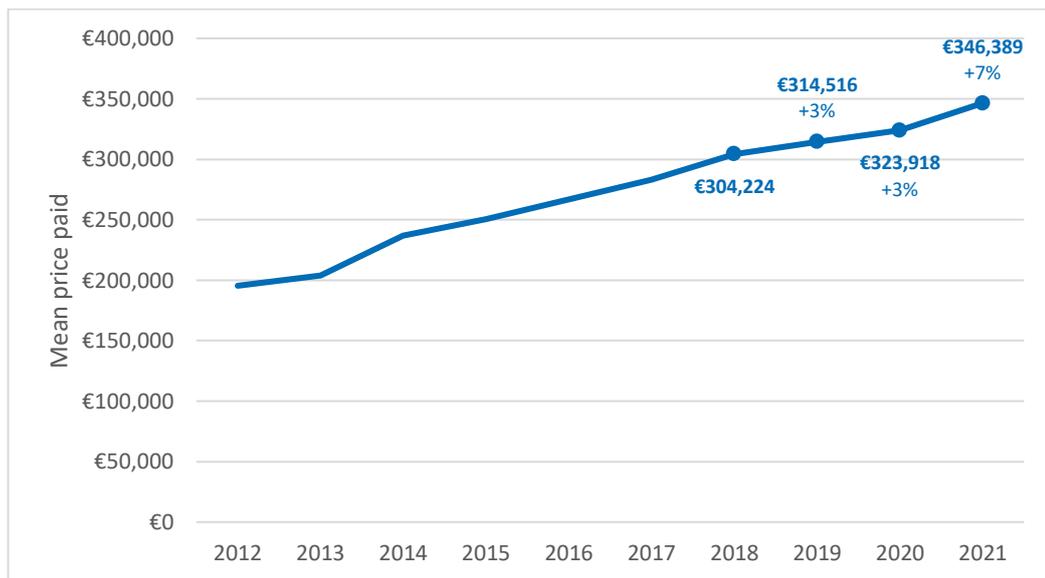
**Market signals**

4.7 Worsening market signals, including rising house prices, represent a direct symptom of an imbalance between the supply of and demand for new housing.

4.8 The HNDA reports that house prices in Kildare have ‘consistently grown since 2012’, with the mean price reaching a high of €323,994 in 2020<sup>37</sup>. This was around 3.0% higher than the year before, meaning that house prices grew at nearly four times the rate seen throughout the state (0.8%).

4.9 The HNDA could only draw upon sales to the end of July 2021, commenting that the mean price to that point (€334,769) was 3% higher than in the previous calendar year. The further data that is now available confirms that the mean price rose even further in the latter months of the year, such that the average for 2021 reached €346,389<sup>38</sup>. This was some 7% higher than the previous year, meaning that prices rose by more in that year than in the previous two combined (6%).

**Figure 4.3: Mean Price Paid for Housing in Kildare (2010-21)**



Source: CSO

<sup>37</sup> Appendix 1 to the Plan ‘Housing Need and Demand Assessment & Housing Strategy’ (2022), Table 19 and preceding paragraph

<sup>38</sup> CSO Table HPA02: Residential Dwelling Property Transactions. Like the HNDA, this captures the executions of all dwellings bought on the open market by household buyers

## Population growth pressures

4.10 The projecting of future population growth is a key input to the calculated demand for housing. The implementation of the Section 28 Planning Guidelines, with regards the Housing Supply Target Methodology, saw ESRI being tasked with providing a nationally integrated and standardised set of population projection outputs. These were derived using a model which presented a number of different development scenarios:

- **Convergence** – based on ESRI: 50:50 City Scenario and incorporating unmet demand in years 2017-19 inclusive over the period 2020-2031;
- **Baseline** – projecting a ‘business as usual’ scenario which is based on current trends and medium-term projections for the Irish economy;
- **NPF 50:50 City** – consistent with the NPF strategy;
- **High Migration** – incorporating assumptions around high international migration flows into Ireland based on higher economic growth than the baseline; and
- **Low Migration** – incorporating assumptions around lower international migration flows into Ireland based on lower economic growth than the baseline.

4.11 These scenarios are all considered in the HNDA. The implied need arising from each in Kildare is shown in Table 4.1 below, drawing on the information presented in Table 11 of the HNDA.

**Table 4.1: Forecasted Additional Households per annum: Various ESRI scenarios**

2020 – 2031	NPF: Convergence	Baseline	50:50 City	High Migration	Low Migration
Total	18,135	17,990	17,643	19,868	16,569
Annual average	1,511	1,499	1,470	1,656	1,381

*Source: Kildare HNDA, Table 11*

4.12 These scenarios show a range of need arising from the formation of between 16,569 and 19,848 households, framed by the two migration scenarios.

4.13 It is evident that the Draft Plan opts for the NPF Convergence scenario, with this aligned with the calculation of the housing target replicated in section 2 of this report and falling within this range at 18,135 households. In this regard the HNDA is clear to articulate that this scenario is *‘the recommended housing demand scenario to be used by planning authorities in order to plan for the provision of housing to meet projected levels of demand in accordance with the NPF strategy’*. It does, however, also concede that *‘the guidelines state that deviation from this scenario must be evidence-based and consistent with these guidelines’*<sup>39</sup>.

<sup>39</sup> Appendix 1 to the Plan ‘Housing Need and Demand Assessment & Housing Strategy’ (2022), page 18

- 4.14 With the analysis in section 3 clearly challenging the ongoing validity of these projections in the context of a national housing crisis, it is impossible to ignore the fact that a key principle of the NPF scenario is the redistribution of need away from Dublin and its surrounding area. This essentially means, in the context of the high existing demand pressures affirmed above and future drivers considered later in this section, that the provision of homes will be curtailed in areas such as Kildare.
- 4.15 In the context of a national housing crisis that is evidently worsening, the rate of job creation – considered further below – and the recent evidence of very strong demand for housing, the HDNA’s minimal efforts to take account of evidence of higher need are considered a significant failing.
- 4.16 The HNDA confirms that the expansion of Kildare’s population in the years to 2016 is mainly attributable to both a high birth rate (linked to a younger population) and high levels of inward migration. The County’s attractiveness in no small part results from its location close to Dublin, its strong transport connections and its economic success. These are considered in more detail later in this section but the extent to which population growth has been sustained more recently, and beyond the base date of the nationally produced projections (2017) is important in understanding future need.
- 4.17 While the 2016 Census continues to provide the last official estimate of the population, the CSO is currently experimenting with the use of administrative data and published experimental estimates for 2020 late last year, after the HNDA was finalised<sup>40</sup>. These suggest that the population of Kildare has grown by some 11% since the 2016 Census, almost doubling the rate of growth experienced in the five years prior (6%) and indeed doing so over a slightly shorter period of four years. The population of the state, by comparison, grew by only 9% over the same period, this also far exceeding the growth recorded in the previous five years (4%).

**Table 4.2: Benchmarking Population Growth in Kildare (2016-20)**

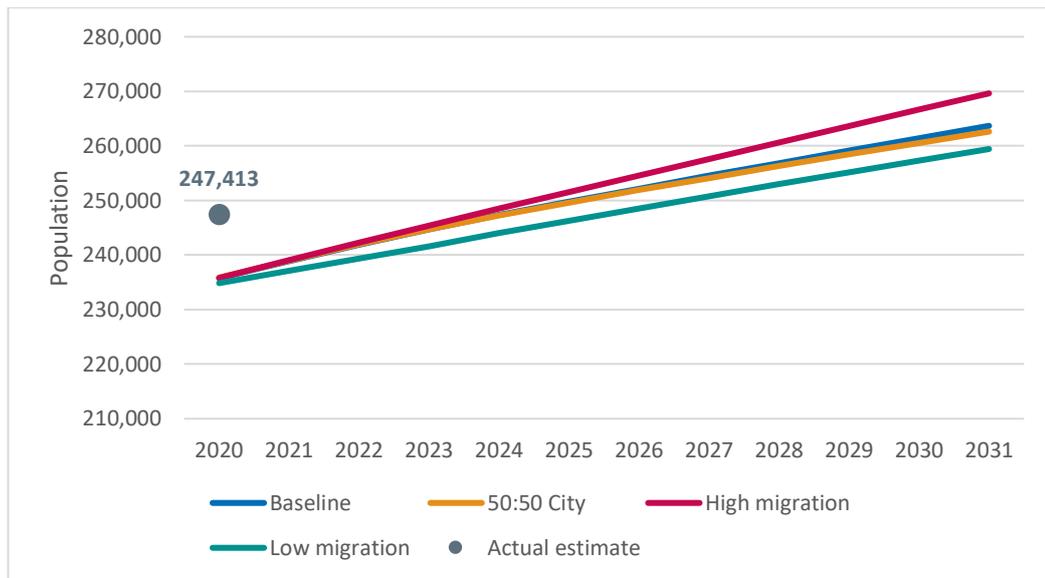
	2016	2020	Change 2016-20	Change 2011-16
Kildare	222,504	247,413	11.2%	5.8%
State	4,761,865	5,203,265	9.3%	3.8%

*Source: CSO; Turley analysis*

- 4.18 The resulting population of circa 247,413 residents, as of 2020, far exceeds what was expected by even the most optimistic of the various scenarios introduced earlier. None anticipated the County having more than 235,872 residents in 2020, but it is actually estimated to have around 11,500 more – a difference of some 5%.

<sup>40</sup> CSO (December 2021) Irish Population Estimates from Administrative Data Sources, 2020

**Figure 4.4: Benchmarking Estimated Population against Projections**



Source: CSO; Turley analysis

- 4.19 This casts doubt upon the accuracy of any scenario, but at the very least suggests that the upper end of the range they create should be favoured as an absolute minimum. The NPF scenario, sitting in the middle of the range, appears much less appropriate.
- 4.20 While the HNDAs do not consider the more recent data now available, it is evident that the population of Kildare is continuing to grow at a greater rate than nationally. It is reasonable to argue in this context that as a minimum the high migration scenario must be more representative of a potential future growth trend. In contrast the NPF scenario would serve to constrain population growth, with this having consequences for ensuring a sustainable local economy and the affordability of housing as considered further in section 6 of this report.

### Pent-up demand

- 4.21 In arriving at the housing target, it is acknowledged that the Toolkit calculation includes an estimate of unmet housing need. This does, however, squarely focus on the number of overcrowded and homeless households, in doing so failing to recognise the full consequences of issues related to pent-up demand. Indeed, it is considered that the 346 households categorised as being in unmet need, and therefore additional to projected population / household growth, is a woeful underrepresentation of the full number of potential households who are or will be constrained from exercising their ability to independently form over the plan period.
- 4.22 It assumes, for instance, that all of the households with unmet housing needs reside in the country, but this is not necessarily the case. The Draft Plan confirms that nearly 21,200 people work in the County but travel in from elsewhere<sup>41</sup>, and it is not unreasonable to expect that at least some of these individuals would prefer to live in

<sup>41</sup> Draft Kildare Development Plan (2022), Section 4.3.2

Kildare if suitable housing was available and affordable. They are extremely unlikely to be even unintentionally counted in the existing allowance for an unmet need for 346 homes, which would equate to only 2% of those commuting in from elsewhere.

4.23 The scale of the issue is better shown through analysis of recent changes to household size and related to this, household formation rate assumptions by age group. A number of commentators on the issues relating to an undersupply of housing in Ireland, introduced in the previous section, have sought to use analysis of these datasets to demonstrate that the number of households constrained from forming and entering the housing market represents a substantially higher pent-up need which is not accounted for through the nationally prescribed housing supply calculations.

4.24 The Draft Plan cites evidence from the RSES produced for the EMRA which identifies that:

*“The slow growth of housing stock compared to rates of population growth and household formation has led to an increase in the average number of persons per household to around 2.8 in the Region, based on the 2016 census, which saw a reversal of the long-term decline in the average household size”<sup>42</sup>*

4.25 Within Kildare itself, the Draft Plan observes that the 2016 Census recorded an average household size of 3.0 persons, up from 2.94 in 2011 – mirroring the rise that was notably seen in many urban areas<sup>43</sup> – but down from 3.19 in 2002 and 3.01 in 2006. The HNDA provides insight into the factors considered to have resulted in an increase in household size, stating that:

*“The increase may reflect the difficulties people have faced in forming new households as a result of the last economic cycle given the decline in both income levels and construction activity”<sup>44</sup>*

4.26 This is reinforced within the HNDA in its consideration of household formation rates, also known as headship rates. Its analysis confirms that whilst households’ ability to form improved up to 2008, it subsequently worsened both nationally and in Kildare itself. The relationship with the supply of homes and the ability to access them is importantly proven to be most acute for younger households, who displayed a much lower headship rate in 2016 to suggest that they had a much smaller chance of being able to form<sup>45</sup>. Where it is clear from periods of stronger supply and better affordability that there is a preference for younger households to be independent, it is apparent that the housing market is acting to curtail the choice available to such households in Kildare as well as nationally.

4.27 The Draft Plan proceeds to note that the NPF suggests that:

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<sup>42</sup> Draft Kildare Development Plan (2022), Section 3.4.2

<sup>43</sup> Estimating pent-up housing demand, Paul Kilgarriff

<sup>44</sup> Appendix 1 to the Plan ‘Housing Need and Demand Assessment & Housing Strategy’ (2022), page 33

<sup>45</sup> *Ibid*, Table 8

*“...the average household size is expected to decline nationally to 2.5 persons by 2040. By the end of the HNDA period, 2031, it is forecast that the average household size for County Kildare will fall to 2.77”<sup>46</sup>*

- 4.28 This confirms that that there remains an expectation, within the projection that informs the housing target, that the household size in Kildare will in 2031 still be higher than the current national average (2.73), which has itself increased in recent years.
- 4.29 The negativity of such an assumption is further emphasised when considering earlier expectations around falling household sizes. It is of note that the higher levels of housing need quantified in the 2011-2017 Kildare County Development Plan reflected an expectation that household size in the County would continue to fall to 2.39 persons by the current year<sup>47</sup> (2022). This has evidently failed to occur, despite the County having a comparatively youthful population as identified in the HNDA.
- 4.30 It is evident that alongside stronger than forecast population growth a significant contributing factor to the failure to see these trends realised has been the under-delivery of homes back over the last ten years. Whilst, as Figure 4.1 shows, recent rates of delivery have been comparatively strong taken over the longer period they have fallen well short of successive plan targets referenced in section 2.
- 4.31 Where it is clear that larger household sizes reflect a failure to provide the homes needed, it is concerning that the current estimate of housing need implicitly assumes that residents of Kildare are expected to suffer a housing market situation which is not going to meet their needs, nor enable them to realise aspirations to form their own households in the way others formerly have.
- 4.32 Furthermore, the assumption which sees average local household sizes remain comparatively high fundamentally sits at odds with the Draft Plan’s expectations around the redevelopment of urban regeneration sites and, in compliance with national policy, the emphasis on compact growth. This development strategy orients itself to the provision of increased numbers of apartments as part of the mix of new homes. The nature of this type of housing means that it will, in large part, be occupied by households of 1 or 2 persons. The outcome will therefore be a supply-led fall in household size, which if not matched with comparable numbers of new homes being provided means a further curtailing of the ability for households to find the homes they need.
- 4.33 It is of note that the HNDA acknowledges that the Council is able to substitute its own estimate of unmet need within the Toolkit calculation, according to the associated guidance<sup>48</sup>. It is strongly considered that the above and the telling market signals form a clear justification for the Council to acknowledge a much greater level of unmet need or pent-up demand.
- 4.34 Such an approach could involve a consideration of the number of homes needed to enable the average household size to reduce to levels previously seen as reflective of a

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<sup>46</sup> Draft Kildare Development Plan (2022), Section 3.10

<sup>47</sup> Kildare County Development Plan 2011 – 2017, page 24

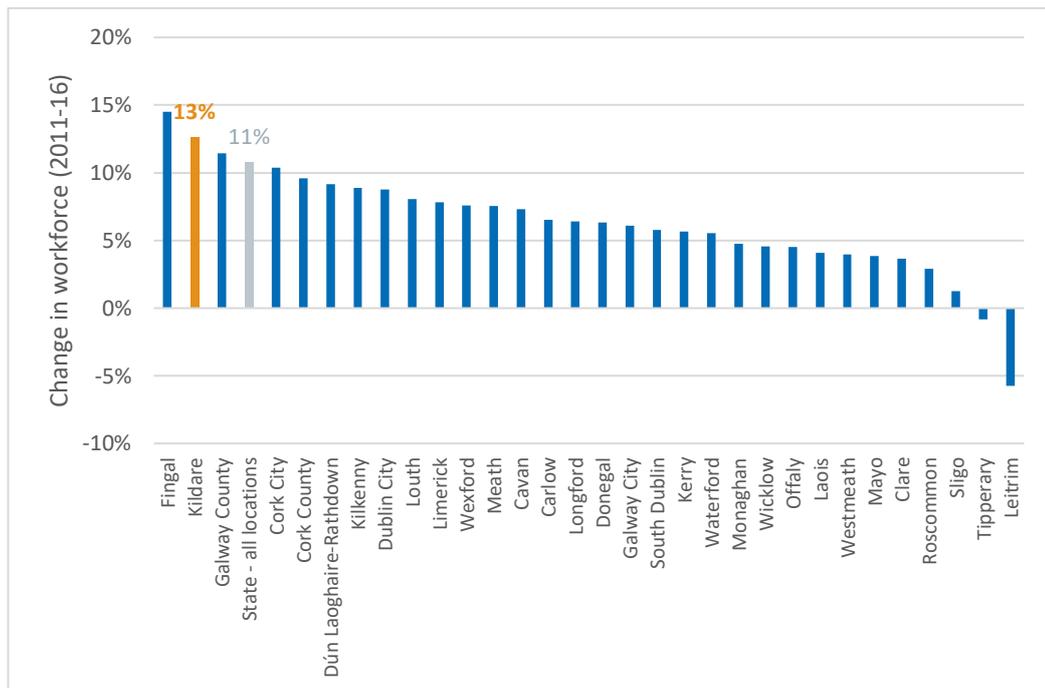
<sup>48</sup> Appendix 1 to the Plan ‘Housing Need and Demand Assessment & Housing Strategy’ (2022), page 37

healthier housing market. This would ensure that the growing number of forcibly concealed households are accounted for, and their housing needs provided for.

### Economic drivers

4.35 Kildare has been extremely successful at creating new jobs in recent years. It created an average of 489 jobs per annum during the five years to the 2016 Census, meaning that employment rose by a total of 13% in this time. This exceeds the rate of growth seen across all locations in the state (11%) and ranks as the second highest rate of growth amongst its 31 local authorities, behind only Fingal<sup>49</sup> (15%). The Draft Plan itself recognises the strength of the local economy and specifically that *‘it has traditionally attracted a lot of inward investment’*<sup>50</sup>.

**Figure 4.5: Benchmarking Job Growth in Kildare (2011-16)**



Source: CSO

4.36 The Draft Plan clearly expects and allows for this growth to be sustained over the plan period. The capacity to continue to generate jobs, for example, is recognised in the continued development of new *‘hyper scaled distribution centres’* within the Naas to Newbridge Strategic Economic and Employment Zone, with recent permissions including the largest developments of this type nationally (68,000 sqm facility for Barola/Primark). Furthermore the IDA’s acquisition of land in the zone is, it is confirmed, intended to enable the attraction of further strategic employers in the County arising from Foreign Direct Investment. The Draft Plan is clear to assert that the focus of new development in this area will be on higher value jobs and the attraction of

<sup>49</sup> CSO (2016) Census Table E6033 – Population aged 15 years and over at work, usually resident and present in the state 2011 to 2016

<sup>50</sup> Draft Kildare Development Plan (2022), Section 2.14

significant employers. Evidently the attraction of such investment will generate further demand for employees to live in proximity, with a breadth of housing needs represented by the intended scope of new jobs.

- 4.37 Separate consideration is also given to the importance of the Metropolitan Area Strategic Plan (MASP) for Kildare included in the Regional Spatial and Economic Strategy (RSES). The role of this Plan in further generating employment opportunities using existing assets such as the former Hewlett Packard Site and Collinstown site at Leixlip are emphasised. The realisation of planned regeneration and investment will need to be aligned with the parallel provision of new homes to accommodate a workforce if the intended goal of attracting *'further investment and counter commuter outflows from the county'* is to be achieved<sup>51</sup>. Indeed, the importance of an aim to *'co-locate employment centres near homes and communities, thereby reducing the need for unsustainable commuting patterns into, within or outside of the County'* is explicitly described<sup>52</sup>.
- 4.38 In this context the Draft Plan also proceeds to outline the intention to sustain employment growth within its designated Key Towns (Naas and Maynooth). It recognises the importance of the ongoing investment and growth in key education providers such as Maynooth University and St. Patrick's College Campus. The focus is again not only on job generation but also the retention and attraction of graduates in higher value knowledge-based sectors, again therefore having a direct impact in generating a sustained and strong demand for homes which match the expectations and aspirations of those employed in these sectors of the economy.
- 4.39 Furthermore, the Draft Plan recognises the potentially important role of employment land zoning to ensure a sustainable balance of jobs and housing. Table 2.9 of the Draft Plan confirms that there is currently just short of 1,100 ha of undeveloped lands suitable for employment in the County. This is evidently a significant quantum of land and the addition of further lands, required potentially to ensure land is available where there is market demand and a proximate labour-force – noting a commitment to monitor the need for new land in the Draft Plan – would represent a further potential source to sustain and indeed increase the County's capacity to create jobs and attract new labour.
- 4.40 It is recognised, as considered in the HNDA, that the County has in recent years been successful in attracting and retaining those of working age to support local economic growth and the growth of the wider functional economy, considered further below. However, given the scale of economic ambition and opportunity outlined within the Draft Plan it is apparent that this success will need to be sustained and indeed increased.
- 4.41 Given the tight labour-force this emphasises the importance of responding positively in the provision of new housing to accommodate new labour. Where the proposed level of new homes is so clearly rooted in past demographic trends, the continued acceleration of economic growth would strongly imply the need for a parallel response

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<sup>51</sup> *Ibid*, Section 2.15.2

<sup>52</sup> *Ibid*, Section 2.15.5

in further boosting housing supply above such trend-based projections of housing need.

### **Wider housing market pressures**

- 4.42 Where Kildare’s current and future economy, as described above, will clearly be expected to keep acting as a driver of high demand for housing, it is important to recognise the role the County plays in a wider economic geography. The Draft Plan recognises this in describing Kildare as having a net outflow of commuters, a position which is unsurprising where it separately notes that the County is ‘*well served by both rail and rail infrastructure and being located in close proximity to Dublin, the airport and port*’. Indeed, the complex inter-relationships in work-resident patterns are described with reference to the findings of the 2016 Census:

*“Kildare had the 6<sup>th</sup> highest rate of outbound commuters in 2016 with 39.1% out commuting with the top employment destinations being Dublin City, South Dublin, Fingal, Dun Laoghaire-Rathdown and Meath. By comparison, more than 33% of all jobs in Kildare are occupied by persons outside the county with the top employment origins being Laois, South Dublin, Meath, Dublin City and Offlay”<sup>53</sup>*

- 4.43 This highlights the flows of workers in both directions, and around a functioning economic area that includes some of the most vibrant and growth-oriented parts of the state’s economy.
- 4.44 This important wider economic context further enhances the importance of a positive approach to planning for new homes in Kildare, where it is apparent that growth pressures will be sustained not only from within but also across a wider market geography.

### **Summary and Implications**

- 4.45 There is clear evidence of a stronger current demand for housing in Kildare than implied by the calculated need for only 1,535 homes per annum that underpins the Draft Plan’s housing target.
- 4.46 Where the scale of delivery of new housing is reflective of the demand context, it is telling that an average of 1,863 homes have been completed annually over the last three years and in the last calendar year (2021) just over 2,000 new homes were built. This reflects a marked increase on the previous year and contrasts with a national picture which has seen rates of delivery broadly stagnate.
- 4.47 Rising house prices represent another important signal of imbalance between supply and demand. Even the higher rates of delivery recorded in recent years have been insufficient to address significant increases in the average price of housing. House prices have increased consistently since 2012 but reached €346,389 last year, some 7% higher than in the previous year with prices rising by more in that year than in the previous two combined (6%).

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<sup>53</sup> Draft Kildare Development Plan (2022), Section 2.14

- 4.48 This market response is the result of a complex interplay of factors but it is evident that sustained and increasing population pressures are significantly contributing. With the calculated need and therefore housing target based on the ESRI scenarios produced five years ago, the latest population estimate for Kildare (2020) suggests that population growth has far outpaced these projections. As of 2020 it is estimated that the County was home to circa 247,413 residents, with even the highest of the projections underestimating this growth by around 11,500 people (5%). In the context of a need for housing, this level of variance is significant and provides at least part of the explanation for the symptoms of stronger market demand observed above. It also serves to challenge the extent to which these nationally driven scenarios are adequately reflective of local market drivers and the need therefore for increased flexibility and/or a departure from their rigid application.
- 4.49 Another key factor is the scale of pent-up demand which has arisen over recent years. Where the housing supply calculation methodology accounts for estimates of homeless and overcrowded households, it fails to accept the wider consequences of a sustained failure to deliver the homes needed. This has manifested itself in increasing household sizes in Kildare, reflecting the inability of younger households to independently form. Significantly the 2016 Census showed that the average household size in the County stood at 3.0 persons, increasing from 2.94 in 2011. Where evidence confirms this is materially the result of a shortage of housing supply, it is of particular concern that the informing demographic projection assumes that sizes will fall to only 2.77 in 2031. This is higher than the current national rate, itself a symptom of a failing housing market. This implicitly suggests that it is acceptable for younger households to be constrained in realising their aspirations in meeting housing needs in the County. This is clearly unacceptable. Applying a more positive assumption which would see household sizes fall in line with longer term trends or to be comparable with other national housing markets would generate a substantially greater need for homes to be provided in the next plan period.
- 4.50 Finally, the continued success of the County's economy will likely act as a further sustained driver of demand. It is apparent that the increase in the availability of jobs both within Kildare but also in the wider Dublin area will have impacted on its ability to attract and retain labour. Where the Draft Plan establishes an objective to achieve a better balance of sustainable commuting it is critical that housing delivery keeps pace with local job generation. The ambition of the Draft Plan in this regard is clear with this articulated in the identification of significant areas of planned economic growth matched by evidence of significant business investment plans.

## 5. The proposed supply response

### The Draft Plan's 'Core Strategy' approach to planning for supply

- 5.1 The Draft Plan states that the 'Overall Aim' of the Core Strategy 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'*.
- 5.2 The Draft Plan adds to this by confirming that *'The primary purpose [of the Core Strategy] is to provide an evidence-based rationale for the quantum of land proposed to be zoned specifically for housing, population and employment or mixed-use to accommodate and align with projected demand'*.
- 5.3 Section 2.3 and Table 2.1 of the Draft Plan set out the statutory requirements of the 'Core Strategy' and reference is made to a 'mandatory evidence-based Core Strategy'.
- 5.4 Section 2.4 of the Draft Plan acknowledges that *'The 'Core Strategy and Settlement Hierarchy of the Draft County Development Plan are defined by the national and regional planning policy frameworks comprising: Project Ireland 2040 National Planning Framework; the Eastern and Midlands Regional Spatial and Economic Strategy 2019-2031 and Section 28 Ministerial Guidelines'*.
- 5.5 It is noted that the 'Development Plans: Guidelines for Planning Authorities (Draft Aug 2021)' are specifically referenced (among others) at Section 2.4.3 of the Draft Plan with respect to Ministerial Guidelines that directly inform the preparation of the Core Strategy.
- 5.6 In terms of devising a Core Strategy, the Draft Plan lists the following as 'main considerations' of the evidence-based analysis which has informed the Core Strategy:
- Trends in Population Growth
  - Population Projections for Kildare
  - Evaluation of Housing Demand
  - Housing Targets
- 5.7 Section 2.8 of the Draft Plan then provides commentary on the 'Tiered Approach to Zoning' as required by the National Planning Framework, which the Draft Plan describes as:
- **Tier 1: Serviced Zoned Land** – *comprising lands that are able to connect to existing development services and generally positioned within the existing built-up footprint of a settlement or contiguous to existing developed lands or spatially sequential within the plan area.*

- **Tier 2: Serviceable Zoned Land** – comprising lands that are not currently sufficiently serviced to support new development but have the potential to become fully serviced within the life of the plan. These lands may be positioned within the existing built-up footprint of a settlement, or contiguous to existing developed lands or to Tier 1 zoned lands. The potential for delivery of the required services and/or capacity to support new development on Tier 2 lands must be identified and specific details provided by the planning authority in the form of an Infrastructural Assessment.
- 5.8 The Draft Plan notes that to comply with the requirements of the NPF, a Sustainable Planning and Infrastructural Assessment (SPIA) was undertaken to assess the suitability of lands for future development.
- 5.9 The Draft Plan advises that ‘Volume 2 of the Draft Plan sets out the **land use zoning** for settlements of the **small towns and villages** within the county’ [our emphasis] and that ‘Volume 2 is **accompanied by an assessment** which provides a weighting of potential sites for future development **on the basis of sustainable planning and serviceability/infrastructural grounds**. This **assessment assists in the designation of lands as either Tier 1 lands or Tier 2 lands** and identifies the **likely development services required to support new development**. The **SPIA was integral in informing the future development strategy for the small towns and villages**’ [our emphasis].
- 5.10 So far as the higher order settlements are concerned, the Draft Plan states 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’ [our emphasis].
- 5.11 In terms of devising a Settlement Strategy, the Draft Plan notes ‘Designations should be made on the basis of **the role and function of each settlement** consistent with the **asset-based approach of the RSES** and **the potential for economic and social development**’ [our emphasis].
- 5.12 The Draft Plan also notes that ‘Assessments shall be in compliance with policy directives of the Minister issued under Section 29 and have regard to guidelines issued by the Minister under Section 28 or take account of any relevant policies or objectives of the Government, the Minister or any other Minister of the Government...’.
- 5.13 The Draft Plan acknowledges that the RSES designated Naas and Maynooth as ‘Key Towns’ but that the remaining settlements have ‘...been designated in accordance with an evidence-based assessment undertaken by Kildare County Council’.
- 5.14 In designating the remaining settlement, the Draft Plan states that ‘A range of factors were considered in the context of the allocation of settlements to each level, as follows:
- Key Town designations in the RSES.
  - Scale of existing population and the performance of individual settlements.
  - Proximity to high quality public transport services

- *Availability and capacity of physical and social infrastructure currently in place in each of the settlements.*
  - *Environmental sensitives in the county’.*
- 5.15 The Draft Plan further states that ‘As part of the preparation of this Plan **a survey was undertaken** of all settlements in the county that **did not require a mandatory Local Area Plan**’ [our emphasis]. The Draft Plan advises that the survey ‘...was undertaken to determine the level of existing physical, social and community infrastructure in each settlement’ and that ‘**A number of amendments were made to the Settlement Hierarchy arising from this process**’ [our emphasis].
- 5.16 Section 2.12 of the Core Strategy sets out the preferred development strategy for the County as follows:
- *Achieving the critical mass in the Metropolitan Area Strategic Plan (MASP) area (Maynooth, Leixlip, Celbridge & Kilcock) and in the Key Towns of Naas and Maynooth.*
  - *Measured growth with emphasis on economic growth in the towns identified as Self-Sustaining Growth Towns and Self-Sustaining Towns as per Table 2.7.*
  - *A hierarchy of smaller rural settlements to provide a range of services and employment for their local populations.*
  - *Development in rural areas with a focus on agricultural diversification, appropriate rural enterprise (e.g. renewable energy production) and the strengthening of existing towns and villages.*
  - *Protecting the environment by recognising the various environmentally sensitive zones within the county but not to exclude appropriate and otherwise acceptable uses and development.*

**Figure 5.1: Settlement Hierarchy and Typology County Kildare**

Hierarchy	Description	Locations
<b>Key Towns</b>	Large towns which are economically active that provide employment for their surrounding areas. High quality transport links and the capacity to act as regional drivers to complement the Regional Growth Centres.	Naas Maynooth
<b>Self-Sustaining Growth Towns</b>	Moderate level of jobs and services.	Newbridge Leixlip Kildare Town Athy
<b>Self-Sustaining Towns</b>	High levels of population growth and a weak employment base.	Celbridge Kilcock Monasterevin Clane
<b>Towns</b>	Local service and employment functions in close proximity to higher order urban areas.	Sallins Kilcullen Kill Prosperous Rathangan Castledermot Derrintum

### Limitations of the Draft Plan

5.17 Our review of the national legislative and Section 28 guidance requirements with respect to the preparation of Development Plans, particularly with respect to the Core Strategy, and of the approach adopted by Kildare County Council for the Draft Plan has identified a number of issues with respect to the approach proposed in the Draft Plan, as outlined below<sup>54</sup>.

**Table 5.1: Review of Development Plan Requirements and DKCDP Approach**

Requirement	Draft KCDP Limitations/Issues/Non-Compliance
<b>Section 10(1) of the Planning Act<sup>55</sup></b>	The Draft Plan does not contain ‘...a plan(s) indicating the development objectives for the area’ noting that there are no land use zoning maps provided for the ‘higher order settlements’ within the plan area.
<b>Section 10(1A) of the Planning Act</b>	Without the inclusion of land use zoning maps for the higher order settlements, and noting the reliance on out-of-date and soon to expire Local Area Plans, it is unclear if the Draft Plan is ‘...consistent, as far as practicable, with national and regional development objectives...’ and ‘...specific planning policy requirements specified in guidelines under subsection (1) of section 28’.

<sup>54</sup> Refer to Appendix 1 of this Report, which provides an overview of the key legislative and guideline requirements for Development Plans.

<sup>55</sup> Planning and Development Act 2000 (as amended)

<b>Section 10(2A)(a) of the Planning Act</b>	Same as above.
<b>Section 10(2A)(c) of the Planning Act</b>	The Core Strategy does not provide information with respect to ' <i>...land already zoned for residential use or a mixture of residential and other uses</i> ' with respect to the higher order settlements.
<b>Section 10(2A)(d) of the Planning Act</b>	The Core Strategy does not provide information with respect to ' <i>...land proposed to be zoned for residential use or a mixture of residential and other uses</i> ' with respect to the higher order settlements.
<b>S95(1)(a) of the Planning Act</b>	Without the inclusion of land use zoning maps for the higher order settlements, and noting the reliance on Local Area Plans, which are either out of date or soon to expire/likely to expire before 2029, it is unclear if the Draft Plan can: <ul style="list-style-type: none"> <li>• '<i>...ensure that sufficient and suitable land is zoned for residential use or for a mixture of residential and other uses, to meet the requirements of the housing strategy</i>'; or</li> <li>• '<i>...ensure that a scarcity of such land does not occur at any time during the period of the development plan</i>'</li> </ul>
<b>Circular Letter: NRUP 04/2021<sup>56</sup></b>	The Draft Plan has not had full ' <i>...regard to the Draft Guidelines...</i> ' – see comments below with respect to the Draft Guidelines.
<b>Draft Guidelines<sup>57</sup> – Section 4.2 Statutory Requirements</b>	The Draft Plan is missing the following information described as 'key elements of the core strategy': <ul style="list-style-type: none"> <li>• <i>demonstrate consistency with national and regional spatial strategy and policy, which must include an emphasis on ...the proportionate development of settlements based on the availability and activation of serviced land</i></li> <li>• <i>detailed analysis of existing and proposed land use zonings, with a particular focus on residential development.</i></li> </ul>
<b>Draft Guidelines – SPPR DPG 5</b>	The Draft Plan does not appear to have applied the development plan core strategy requirements ' <i>...to each individual settlement where any land is zoned for residential purposes or a mixture of residential and other</i>

<sup>56</sup> Circular Letter: NRUP 04/2021: Development Plans, Draft Guidelines for Planning Authorities

<sup>57</sup> Development Plans - Draft Guidelines for Planning Authorities, August 2021

	<p><i>uses... and presented in clear, tabular format' noting that it does not contain the following information for the higher order settlements, '...settlement and site-level information on housing and mixed-use development land, that goes beyond broad, settlement-based targets for housing'.</i></p>
<p><b>Draft Guidelines – Section 4.4.3 Ensuring a Sufficient Supply</b></p>	<p>It is not clear that if the Draft Plan incorporates a flexible approach in the zoning of housing land to ensure a sufficient supply of housing over the plan period which would provide a degree of choice in development sites and avoid restricting supply of new housing.</p> <p>It is noted that the Draft Guidelines acknowledge that it <i>'...may be necessary to zone more serviced land and sites for residential (or a mixture of residential and other uses), than would equate to meeting precisely the projected housing demand for that settlement'.</i></p>
<p><b>Draft Guidelines – Section 4.5 Devising the Settlement Strategy</b></p>	<p>The Core Strategy is currently missing important information with respect a <i>'...key consideration...'</i> in the <i>'...holistic, evidence-based analysis...'</i> that is required to formulate a <i>'...sustainable settlement strategy for the county...'</i>, i.e. a Settlement Capacity Audit (SCA) for the higher order settlements.</p> <p>It is noted that the Draft Guidelines confirm that <i>'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'.</i></p>
<p><b>Draft Guidelines – Section 4.5 Devising the Settlement Strategy</b></p>	<p>The Draft Plan does not contain <i>'...a complete analysis of the capacity of each settlement to accommodate new development in terms of suitable lands and infrastructure within the plan period'</i> which should accord with <i>'...Appendix 3 to the NPF, which distinguishes between lands that are 'Serviced' (Tier 1) and those that are 'Serviceable' (Tier 2)' and '...inform the core strategy considerations set out in Section 4.4...'</i></p>
<p><b>Draft Guidelines – SPPR DPG 6</b></p>	<p>The Draft Plan does not comply with the following requirements:</p> <p><i>'The total quantum of existing and proposed land zoned for residential use to achieve the additional housing and population targeted over the six-year plan period'</i></p> <p>The Core Strategy could also include more information to address the following requirement:</p>

	<p><i>'The rationale for the settlement strategy, that informs the settlement hierarchy, which must address each settlement and area type in the hierarchy'</i></p>
<p><b>Draft Guidelines – Section 6.2.1 Zoning in the Development Plan</b></p>	<p>The Draft Plan is in conflict with this section of the Draft Guidelines noting that it seeks to defer '<i>...land-use zoning decisions...</i>' for the higher order settlements to the local area plan process.</p> <p>The Draft Guidelines advise that this approach should be avoided as it can create '<i>...a scenario whereby the development plan core strategy may be subject to challenge and effectively undermined in a separate statutory process</i>'.</p> <p>The Draft Plan's approach results in the loss of the '<i>...clear practical advantages...</i>' associated with '<i>...aligning the core strategy, settlement strategy and principal residential zoning functions in a single, integrated development plan process</i>', such as:</p> <ul style="list-style-type: none"> <li>• Transparency and coherence in the decision-making process;</li> <li>• Ensuring certainty;</li> <li>• Providing clarity;</li> <li>• Avoiding risk caused by time delays during the LAP process; and</li> <li>• Better resource management and quality outcomes.</li> </ul> <p>It is not surprising that the Draft Guidelines advise that '<i>...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</i>'.</p>
<p><b>Office of Planning Regulator Submission</b></p>	<p>The Draft Plan does not appear to have addressed the directions provided by the OPR in its submission to the Issues Paper for the Draft Plan, including the following:</p> <ul style="list-style-type: none"> <li>• '<i>...make commensurate [population projections and housing need] allocations changes to the extent of residentially zoned land in the LAPs for the county's towns</i>'</li> <li>• '<i>...ensure that the extent of land zoned for residential development in the county's towns including settlements that have a statutory LAP is</i></li> </ul>

*aligned with the population projections and housing need allocations set out in the forthcoming core strategy’;*

- *‘...a significant proportion of the county’s future homes arising from the housing supply targets, will need to be allocated to the designated key towns and larger settlements consistent with the RSES (including MASP)’*
- *‘...revisit the categorisation and positioning of settlements in the hierarchy having regard to the asset based approach outlined in the RSES’.*
- *‘...the Office would strongly advise that all land use zoning objectives for your functional area should be included as part of the development plan rather than delayed to the preparation of local area plans’*

## **Alignment of the LAPs with National Planning Framework and Regional Spatial Economic Strategy**

5.18 Table 5.2 below summarises the status of Kildare County Council’s LAPs; the dates on which they came into effect and the status of the plan, noting if the plan has past its expiration date.

**Table 5.2: Status of Local Area Plans**

LAP	Date of LAP/Came into Effect	Status	In accordance with NPF / RSES
Naas LAP 2021 – 2027	December 2021	Expires December 2027	Yes
Athy LAP 2021 – 2027	September 2021	Expires December 2027	Yes
Leixlip LAP 2020 – 2023	December 2019	<i>February 2023</i>	Yes
Sallins LAP 2016 – 2022	April 2016	<i>Expired April 2022</i>	<i>No</i>
Celbridge LAP 2017 – 2023	August 2017	Expires August 2023	<i>No</i>
Kildare Town LAP 2019 – 2025	<i>Not Adopted</i>	<i>Paused at consultation stage due to Variation to the CDP 2017 -2023</i>	
Kildare Town Local Area Plan 2012 – 2018	December 2012		<i>No</i>

Newbridge LAP 2013 – 2019	December 2013	<i>Extended December 2018 and expired December 2021</i>	<i>No</i>
Maynooth LAP 2013 - 2019 Incorporating Amendment No.1	November 2018	<i>tbc</i>	<i>No</i>
Kilcock 2015 – 2021	November 2015	<i>Expired November 2021</i>	<i>No</i>
Clane 2017 – 2023	June 2017	Expires June 2023	<i>No</i>
Monasterevin 2016 – 2022	March 2016	<i>Expired March 2022</i>	<i>No</i>
Kilcullen 2014 – 2020	October 2014	<i>Expired October 2020</i>	<i>No</i>
Collinstown LAP 2010	January 2010	<i>Expired</i>	<i>No</i>

5.19 Given the age of these plans, it is appropriate to consider whether they have been prepared in accordance with the National Planning Framework and the Regional Spatial and Economic Strategy for the Eastern and Midland Region. It is noted that only 3 of the 13 plans have been prepared in accordance with the NPF and RSES.

5.20 Demonstrably, the majority of the Kildare LAPs are out of alignment with the current national and regional planning policy context, and yet, the Kildare County Development Plan is relying on this suite of plans to allocate the residential zonings to achieve the housing target.

## Housing Supply Constraints

### Review of Development Management Standards

5.21 Chapter 15 of the Draft Plan defines Development Management Standards (DMS) that incorporate the Guidelines for Planning Authorities issued by the Minister, under Section 28 of the Planning and Development Act 2000 (as amended). In preparing the DMS, the Council takes a view on whether to transpose the minimum standards or adjust those requirements. An assessment has been undertaken here of the proposed DMS, to determine the degree of variance from requirements in the guidelines published under Section 28 and to consider if the proposed standards could be construed as onerous and act as an impediment to delivering viable housing projects.

### Overall Approach

5.22 A mathematical rather than placemaking led approach is promoted in the DMS to the design standards, preferring to focus on the metrics of design (i.e., site coverage, plot ratio and separation distances). There are examples with other plans (e.g., Fingal Development Plan) of how a ‘design-led approach’ can be adopted, emphasising the importance of best practice urban design to establish the key design principles.

5.23 Rather than adopting a theme-based approach (e.g., prioritising placemaking, healthy places or regeneration) to the design standards and to establish design priorities (e.g., achieving quality urban design), a more mechanical approach is adopted, beginning with *General Development Standards*, then *Design Statements*, before defining the metrics of housing schemes. A design-led approach is promoted in the *Guidelines for*

*Planning Authorities on Sustainable Residential Development in Urban Areas (2009) and the Urban Design Manual – A Best Practice Guide (2009).*

**Dual Aspect**

5.24 DMS requires that dual aspect is achieved with **all** dwelling units. A dwelling is defined as ‘a house, flat or other place of residence’. While it is reasonable for all houses to be dual aspect, it is generally accepted that a proportion of flats or apartments in a development can be single aspect. Indeed, the Section 28 Guidelines entitled ‘Sustainable Urban Housing: Design Standards for New Apartments’ specifically accepts that up to 33% or 50% (depending on circumstances) of apartments can be single aspect. Whilst it is accepted that dual aspect units enhance residential amenity and improve daylight and sunlight penetration, there should be flexibility where good quality design can ensure single aspect units achieve a similar standard of amenity (e.g. overlooking open spaces, south facing etc).

**Open Space**

5.25 DMS prescribes the quantum of open space to be provided for residential development on greenfield sites to be 20% of the total site area. The requirement rises to 25% on institutional lands and elsewhere requires 15% (i.e. brownfield/infill). *Sustainable Residential Developments in Urban Areas, Guidelines for Planning Authorities (2009)* recommends 2.5 hectares per 1,000 of population, with new residential development on greenfield sites providing minimum open space of 15% of the site and 10% of the site area with new residential development on infill or brownfield sites. Table 5.3 below calculates the degree of variance from the Guidelines for Planning Authorities.

5.26 There is an overarching requirement for minimum densities of 35/ha to be achieved on zoned land, rising to 50+/ha on lands well served by public transport. Currently, with a requirement of 15% public open space, a development can consist of 50% conventional houses and 50% duplex apartments. Increasing the requirement of public open space to 20%, while still achieving the minimum 35/ha density, will increase the proportion of duplexes and apartments to 62%.

**Table 5.3: Comparative Analysis - Open Space Requirements**

	DMS of the Draft Plan	Sustainable Residential Developments in Urban Areas (2009)	Variance
Greenfield	20%	15%	+ 5%
Brownfield/other	15%	10%	+ 5%
Institutional lands	25%	Exceed normal standards	+ 10% (assuming greenfield land)

**Social Infrastructure Audit**

5.27 Conventionally, a Social Infrastructure Audit (SIA) is required for larger residential developments, usually with 50 units or more, which is logical considering these projects have a greater impact/requirement on/for social infrastructure. However, the DMS requires a SIA to accompany all new residential developments over 20 units to

determine if social and community facilities in the area are sufficient to provide for the needs of future residents.

**Parking Standards**

5.28 Parking requirements in the DMS are summarised in Table 5.4 below. Standards prescribed for apartments are comparatively onerous, particularly in smaller apartments (i.e. with 1 or 2 bedrooms).

**Table 5.4: DMS Parking Requirements**

Residential	
Up to and including 3 bedroom units	1 space
4 units or greater	1 space + 0.5 visitor spaces
Apartments	1.5 space per unit + 1 visitor space per 4 apartments

- 5.29 There appears to be a typo here in the Draft Plan and it is assumed that 1 space plus 0.5 visitor spaces per each 4-bedroom unit is what the Draft Plan intended to state here.
- 5.30 It is considered that these standards, as maximum standards, are inadequate and have the potential to create significant parking issues, such as uncontrolled parking in new housing schemes.
- 5.31 The parking strategy and application of parking standards should be informed by a wider strategy to improve the overall public transport provision in Kildare and with clear dates provided in terms of the delivery of required upgrades that would enable more sustainable travel patterns and a decrease in the reliance on the private car as a mode of transport.
- 5.32 It is also considered that a requirement for 1 parking space for every 4 children attending a creche is unrealistic and can have a detrimental impact on the quantum of available valuable serviced housing land.

**Summary and Implications**

- 5.33 The Draft Plan is currently lacking important information with respect to the ‘Core Strategy’ to formulate a sustainable settlement strategy/hierarchy that will properly guide and deliver growth and development within the County over the plan period.
- 5.34 One of the key ingredients, being a Settlement Capacity Audit, has been omitted from the Plan/‘Core strategy’ with respect to the higher order settlements which raises significant issues in terms of the validity of the approach proposed noting the importance of these settlements to deliver the growth envisioned in the Plan as well as addressing the housing needs of the County.

- 5.35 The Draft Guidelines clearly state 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*'.
- 5.36 The Draft Plan's proposed approach results in the loss of the '*...clear practical advantages...*' associated with '*...aligning the core strategy, settlement strategy and principal residential zoning functions in a single, integrated development plan process*', such as:
- Transparency and coherence in the decision-making process;
  - Ensuring certainty;
  - Providing clarity;
  - Avoiding risk caused by time delays during the LAP process; and
  - Better resource management and quality outcomes.
- 5.37 A review of Kildare's LAPs was undertaken to determine their status and respective alignment with the National Planning Framework and Regional Spatial Economic Strategy. Almost all of the LAPs are beyond their plan date. All will either expire before the 2023 to 2029 plan period or during it. Ten of the thirteen LAPs were prepared before the adoption of the National Planning Framework and the Regional Spatial Economic Strategy (for Eastern and Midland Region), meaning that they are entirely out of sync with the current policy context. There is huge uncertainty as to their status.
- 5.38 The Draft Plan presents the opportunity to promote placemaking and encourage high quality design. Unfortunately, the Development Management Standards (DMS) of the plan seeks to apply design metrics rather than a 'design-led' approach and misses the opportunity to prioritise design quality.
- 5.39 A review of the DMS requirements confirms that these generally exceed those identified (as minimums) in the Planning Guidelines, noting in particular: the 20%, 15% and 25% open space requirement for greenfield, brownfield and institutional land respectively; that all dwellings are to be dual aspect; that a low threshold is applied for requiring social infrastructure assessments; and onerous parking requirements for smaller apartments. In combination, these DMS requirements present a significant challenge to housing viability, at a time when the imperative is to optimise schemes, by complying with the Guidelines while maximizing yields.

## 6. The consequences of failing to plan positively

6.1 The Draft Plan acknowledges that the RSES for the EMRA states that:

*“...housing affordability and supply issues are impacting upon health and wellbeing, due to overcrowding, with people residing in substandard accommodation or becoming homeless”<sup>58</sup>*

6.2 The severity of some of the more significant consequences of supply failing to keep pace with need and demand locally are set out within this section. This affirms the importance of a more positive approach being taken in the Draft Plan to ensure that the provision of homes at least keeps pace and indeed builds on recent levels of housing delivery.

### Exacerbating a local housing crisis

6.3 The HNDA sets the tone for the important relationship between housing supply and house prices, affirming that:

*“Since 2010, the property market has been hit by significant undersupply nationally, and prices have risen as a result”<sup>59</sup>*

6.4 The consequences of rising house prices are laid bare in the analysis of issues relating to affordability in the County. In considering average house prices and incomes, in line with the Guidance, the HNDA reaches the important conclusion, noting the average house price of €317,500 in County Kildare at the time:

*“It has been estimated that the average income in Kildare is €66,273 and therefore at present a household on the average income would struggle to afford a dwelling and mortgage at the average price”<sup>60</sup>*

6.5 It also concludes that:

*“At present there is an affordability issue in the County and particularly in the Naas MD, Clane-Maynooth MD and Celbridge-Leixlip MD”<sup>61</sup>*

6.6 Where the analysis in section 4 has confirmed that prices have continued to rise the gap between incomes and the ability to afford a home will have continued to widen. It is therefore of the utmost importance that the supply response is sufficient to ensure a meaningful improvement in affordability. Judging from the relationship between recent comparatively strong rates of delivery and a continued worsening of affordability a further boosting of supply beyond current levels of provision is required to ensure that more households rather than less can access the housing market.

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<sup>58</sup> Draft Kildare Development Plan (2022), Section 3.4.2

<sup>59</sup> Appendix 1 to the Plan ‘Housing Need and Demand Assessment & Housing Strategy’ (2022), page 42

<sup>60</sup> *Ibid*, page 60

<sup>61</sup> *Ibid*

- 6.7 In terms of further evidence of the consequences of continuing to fail to bridge this gap the HNDA confirms that as of 2 November 2021, there were 3,417 households on the Council's Social Housing List. Many of these households will be in the most acute need and the scale of unmet need in this regard highlights the inability of the current stock to address needs in full. It is noted that this figure excludes HAP tenancies, of which there are 2,272.
- 6.8 Addressing the needs of those in most acute need will require a parallel boosting of affordable housing alongside market housing. A failure to do either, as is likely to be the result of the approach taken in the Draft Plan, will mean that increasing numbers of households continue to be priced out of the market and fail to have their housing needs met.

### **Constraining local economic growth**

- 6.9 The analysis in section 4 of this report highlighted the important role that the retention and attraction of younger households has had in supporting the County's economic growth. Ensuring that the labour force can continue to grow was also identified as being critical in the context of the economic aspirations and ambitions articulated in the Draft Plan and supporting local strategies to attract further business investment.
- 6.10 Where it is the case that the provision of new jobs will create a range of opportunities, it is reasonable to suggest that a significant proportion of these jobs will have incomes which fall below the average referenced above. In this context it is important to note, as the HNDA highlights, that first-time buyers have represented a significant part of the housing market (44% in 2020 and 43% in 2021 up to the end of July), when compared with national rates. It is also of note that new build sales have represented a significant part of transactions as well, 43% in 2020 in the county, compared to 24% nationally. In this context the HNDA observes that:
- “This might indicate a close correlation between the volume of first-time buyers, volume of new build transactions and the exceptionally high take up of the Help-to-Buy Scheme in County Kildare since its introduction in 2017”*
- 6.11 Evidently in this context a continued worsening of affordability and/or the loss of government support to such households would have a significant impact on their ability to move into the area.
- 6.12 In turn given their vital role in supporting the local economy, both in Kildare but also arguably across the wider economic footprint of Dublin, this would have potentially significant implications for the ability to keep attracting inward investment where the availability of labour is a key consideration of businesses.
- 6.13 Where such households were forced to live in more affordable areas, this would fundamentally undermine the implicit aim of the Draft Plan to address current unsustainable commuting patterns, serving instead to potentially exacerbate these.
- 6.14 Finally, it is important to acknowledge the important economic contribution that the delivery of homes has in a more direct sense with regards supporting construction and other related employment opportunities. Where the Plan suggests a curtailing of the

supply of homes, as shown in section 4, this will have adverse consequences for these sectors of the economy. Given that the longer-term consequences of the pandemic remain uncertain, the potential to undermine the industry upon which the national boosting of housing supply is dependent is inexplicable.

- 6.15 Areas such as Kildare, where there is demonstrable demand and need for homes, should instead play a more positive role in supporting the boosting of housing supply to ensure a growing capacity across the industry from which to achieve the rates of housebuilding required now and over the horizon of the NPF.

### **Misaligned infrastructure provision**

- 6.16 The Draft Plan's failure to fully recognise the scale of need pressures, including demographic growth, over the plan period coupled with uncertainty with regards the under-zoning of land will present wider challenges to those responsible for providing the infrastructure needed to support growing communities across the County.
- 6.17 This will include infrastructure providers (Irish Water, roads, public transport, ESB, broadband) and the Department of Education and the Department of Health in their planning for pupil and patient provision. The alignment of the capital programme of these departments with the County Development Plan growth projections means that where demand outpaces these projections that communities will not only be adversely affected by a shortage of housing but also the infrastructure required to sustainably meet their needs.
- 6.18 A more positive plan-led approach allowing for flexibility in a responsive land zoning strategy ensures that infrastructure providers can build in their own flexibilities to future business planning. This allows for pro-active rather than reactive planning across the full range of departments and private interests responsible for providing the infrastructure that existing and future communities will need.

### **Summary and Implications**

- 6.19 The evidence in section 4 affirmed that the failure to provide enough new homes to meet demand has contributed to increasing house prices. A consequence of rising house prices has been a parallel worsening of local affordability issues.
- 6.20 The scale of this issue is clearly articulated in the HNDA which observes that a household on the average income in the County would struggle to afford a dwelling and mortgage at an average price. Where it is the case that the gap between house prices and incomes has continued to widen even since the informing analysis was undertaken in the HNDA, the boosting of supply beyond current rates of provision is a prerequisite of making a meaningful positive contribution to addressing affordability.
- 6.21 It is equally the case that the continued worsening of affordability is impacting on those households in most acute need. The HNDA acknowledges this highlighting the number of households that remain on waiting lists and in need of suitable housing. Evidently the boosting of supply of a range of tenures is necessary if the full spectrum of needs are to be met over the plan period.

- 6.22 The consequences of failing to provide a sufficient supply response stretch beyond individual households, however, where the ability for labour to keep moving into Kildare will inform business investment decisions. The scale of the first-time buyer market in Kildare is likely to have had an important role to play in it retaining a comparatively youthful population which in turn is attractive to new businesses. Where this is unable to adequately bridge the issues related to worsening affordability this will have a detrimental effect on the Plan achieving its wider objectives to address unsustainable commuting, forcing households to look for more affordable parts of the state.
- 6.23 Similarly, the implications of under-zoning and the lack of associated planned flexibility runs the significant risk of constraining pro-active planning for those Departments and institutions responsible for delivering the infrastructure which is required to support existing and future communities.

## 7. Conclusion and recommendations

- 7.1 Turley has been commissioned by a consortium of housebuilders<sup>62</sup> to undertake a technical review of the planned provision for housing in the draft Kildare County Development Plan 2023-2029.
- 7.2 This is in response to significant concerns from our clients that the proposed housing supply target of approximately 9,144 homes to the end of 2028, and the responding approach to housing provision, is insufficiently ambitious. It fails to respond positively to the consequences of a worsening national and local housing crisis.
- 7.3 Our clients believe that the need and demand for new homes in the County is considerably greater than the approach to provide for new housing in the Plan suggests, and that its progression would serve to restrict themselves and others from providing the homes which are required to meet the current and future needs of local households.
- 7.4 Our clients believe that the need for new homes in the County is greater than the Draft Plan suggests. If adopted in its current form, it will restrict the industry from providing the homes that are required to meet the needs of local households now and in the future.
- 7.5 The report confirms that:
- **There is a national housing crisis**, manifest in prices which have risen by 10% in the last year and resulting in substantially worsening affordability issues, impacting new households and those in most acute need.
  - **The failure to supply the homes needed at a national level has contributed to this crisis.** The government requires a rapid increase in house production. This forms a critical context to the need for proactive and positive planning from those areas, such as Kildare, where demand is strongest and there is a demonstrable track record of delivery.
  - **Addressing the consequences of this national crisis will require development rates to far exceed the targets enshrined within the NPF.** This reflects the outdated nature of the informing projection modelling, the underestimating of the full scale of pent-up demand and stronger drivers of future demographic and economic demand.
  - The use, within this context, of the nationally provided DHLGH estimates of projected need within **the proposed housing target for Kildare will only curtail recently stronger levels of housing provision.** Over 2,000 homes were delivered last year, for example, demonstrating the strong demand for new homes and the industry's ability to respond if allowed to do so. **Our clients are facing the very real prospect of having to close existing house construction sites and mothball**

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<sup>62</sup> Glenveagh Properties plc, Cairn Homes plc, O'Flynn Group and Ballymore

**the opening of new 'shovel ready' sites because they might exceed artificially derived 'housing target numbers' dictated by the DHLGH**

- The Draft Plan also represents a **regressive step when compared with the current Kildare County Plan 2017-2023, and indeed earlier Plans, which identified a need for more than 2,000 homes per annum** that has been rarely met despite a recent rise in delivery rates. Downgrading the target for new housebuilding in the context of a national and local housing crisis is inexplicable.
- **Kildare is not immune from the national housing crisis.** Prices have risen to the point where the average home cost €346,389 last year, 7% higher than in the year before. This will have only exacerbated a situation where households on average incomes already struggle to afford average prices.
- **Stronger than expected population growth has been a driver of demand for housing in Kildare.** The County had an estimated 247,413 residents as of 2020, some 11,500 more than anticipated by the ESRI projections that underpin the proposed housing target and already exceeding its forecast for 2023. There is every sign that this strong population growth will continue.
- **Failing to plan for this population growth would not only perpetuate the local housing crisis but also compromise the provision of infrastructure and key services.** The HSE and the Department of Education rely on the County Development projections to plan for healthcare and schools. Irish Water, the ESB, TII and the NTA rely on these forecasts for their capital budgets for water services, power supply, roads and public transport.
- **One consequence of historic undersupply, namely pent-up demand from households unable to form independently, only adds to the future need for housing.** This has not been adequately taken into account in proposing a housing target that implicitly and inexplicably assumes that household sizes in the County will at no point fall below even the current state average, despite being a damning reflection of the local housing crisis. Failing to recognise and respond to this issue implicitly accepts that younger households in the County will not be able to enter the housing market, and would only perpetuate existing conditions.
- **The Department's focus on compact growth and prioritisation of urban development lands implicitly assumes an increase in the provision of smaller apartment schemes,** which will self-evidently accommodate smaller households. If the intention is to increase the supply of smaller units, then more units are needed.
- **Strong population growth in Kildare has coincided with strong economic performance,** with a substantial number of new jobs having been created and proven to be attractive to younger people. The Draft Plan clearly aims to sustain this trend and businesses' recent investments suggest that this will be achieved, but **the availability of labour will be a key factor when businesses decide whether to invest.** Providing enough homes to accommodate demand from a growing labour force will be vital to achieving the stated objective of reducing

unsustainable out-commuting, not least given the likelihood of continued economic pressure from Dublin.

- The Draft Plan is **fundamentally flawed** as it **fails to respond to legislative requirements**, including **Sections 10 and 95** of the Planning and Development Act 2000 (as amended) and updated **Ministerial Guidelines** (see Table 5.1 of the Report).
- The Draft Plan **fails to evidentially assess the deliverability of zoned land and does not explain how sufficient land will be zoned across the higher order settlements.**
- The Draft Plan is **missing a key required component** to inform its Core Strategy and Settlement Strategy/Hierarchy, this being a **comprehensive Settlement Capacity Audit.**
- **Reliance by the Draft Plan on a suite of outdated Local Area Plans** to zone the land required to deliver new homes over the plan period is an obvious **risk to housing supply.**
- A **further risk** to housing supply is the Draft Plan's approach to **Development Management Standards** which are **onerous** when compared with the **national guidelines for planning authorities.**
- **A more positive plan-led approach could be taken by the County.** The Draft Fingal Plan adopts such an approach for example, appearing to make a more realistic allowance for pent-up demand in its calculation of need before identifying a more flexible supply of land.

It is abundantly clear that **a more positive approach is required** to both acknowledge the scale of housing need in Kildare and provide a deliverable and flexible supply of land to meet it. The Plan simply must zone new housing land to provide the market with the opportunity to keep building on recent success, avoid any further worsening of affordability and sustainably achieve the County's economic aspirations.

# Appendix 1: Review of Development Plan Requirements

## Planning and Development Act 2000 (as amended)

1. The Planning and Development Act 2000 (as amended) (the Planning Act) sets out a number of requirements with respect to the Development Plan and its 'Core Strategy'. Sections 10 and 93 to 101 of the Planning Act contain provisions which relate to residential zoned land and housing supply.
2. We note the following for the purposes of this Report:
  - Section 10.(1): 'A development plan shall set out **an overall 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' [**our emphasis**].
  - Section 10(1A): 'The written statement referred to in subsection (1) **shall include a core strategy** which **shows that the development objectives** in the development plan are **consistent, as far as practicable**, with **national and regional development objectives** set out in the National Planning the regional spatial and economic strategy **and with specific planning policy requirements specified in guidelines under subsection (1) of section 28'** [**our emphasis**].
  - Section 10(2A): 'Without prejudice to the generality of subsection (1A), **a core strategy shall** –
    - (a) provide relevant information to show that **the development plan and the housing strategy are consistent with** the National Planning Framework and the regional spatial and economic strategy **and with the specific planning policy requirements specified in guidelines under subsection (1) of section 28;**
    - (b) take account of any policies of the Minister in relation to national and regional population targets,
    - (c) in respect of the area in the development plan **already zoned** for residential use or a mixture of residential and other uses, provide details of:
      - (i) the size of the area in hectares, and
      - (ii) the proposed number of housing units to be included in the area [**our emphasis**].
    - (d) in respect of the area in the development plan **proposed to be zoned** for residential use or a mixture of residential and other uses, provide details of:
      - (i) the size of the area in hectares,

(ii) how the zoning proposals accord with national policy that development of land shall take place on a phased basis’ **[our emphasis]**.

- Section 95(1)(a): ‘In conjunction with the inclusion of the housing strategy in its development plan, a planning authority shall, having regard to the overall strategy for the proper planning and sustainable development of the area of the development plan referred to in section 10, **ensure that sufficient and suitable land is zoned for residential use, or for a mixture of residential and other uses, to meet the requirements of the housing strategy and to ensure that a scarcity of such land does not occur at any time during the period** of the development plan’ **[our emphasis]**.

### Development Plans - Draft Guidelines for Planning Authorities

3. In August 2021, the Department of Housing, Local Government and Heritage (DHLGH) issued the ‘Development Plans - Draft Guidelines for Planning Authorities’, under Section 28 of the Planning Development Act 2000 (as amended).
4. The accompanying Ministerial Circular Letter<sup>63</sup> outlines the following with respect to the purpose and application of the Draft Guidelines:

‘These Draft Guidelines are **intended to provide clarity** to assist planning authorities **in the preparation** and variation of city and **county development plans** and the **Office of the Planning Regulator** in undertaking **statutory evaluation and assessment** of same’ **[our emphasis]**.

‘**Planning authorities** and the Office **are expected to have regard to the Draft Guidelines**, while also determining their applicability to ongoing plan review processes and the means by which this might best be achieved’ **[our emphasis]**.

### Core Strategy

5. Section 4 of the Draft Guidelines entitled ‘Core Strategy’ represents a completely new section of the Guidelines<sup>64</sup> and deals specifically with the requirements of the Core Strategy section of the Development Plan.
6. The Draft Guidelines confirm that the ‘...**key elements of the core strategy...**’ are:
  - (i) **Demonstrate consistency** with national and regional spatial strategy and policy, which must include an emphasis on **compact growth and the proportionate development of settlements** based on the **availability and activation of serviced land**;
  - (ii) Provide **detailed analysis of existing** <sup>[65]</sup> **and proposed land use zonings** <sup>[66]</sup>, with a particular **focus on residential development**, and

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<sup>63</sup> Circular Letter: NRUP 04/2021: Development Plans, Draft Guidelines for Planning Authorities

<sup>64</sup> When compared with the ‘Development Plans - Guidelines for Planning Authorities June, 2007’

<sup>65</sup> See Section 10(2A)(c) of the Planning and Development Act 2000 (as amended)

<sup>66</sup> See Section 10(2A)(d) of the Planning and Development Act 2000 (as amended)

(iii) *Set out a settlement hierarchy for a county development plan, a city development plan, or a city and county development plan, as appropriate’ [our emphasis].*

7. The Draft Guidelines then set out the following ‘Specific Planning Policy Requirement’ (SPPR):

*SPPR DPG 5 - The **development plan core strategy requirements** set out in Section 10(2A)(c) and (d) of the Planning Act **must be applied to each individual settlement** where any **land is zoned for residential** purposes or a mixture of residential and other uses, including any applicable rural settlements with a population under 1,500 persons, **and presented in clear, tabular format** [our emphasis].*

8. The above SPPR is accompanied with the following instruction ‘This requires the provision of settlement and site-level information on housing and mixed-use development land, that goes beyond broad, settlement-based targets for housing’ [our emphasis].

#### **Ensuring a Sufficient Supply**

9. Section 4.4.3 of the Draft Guidelines provides guidance with respect to ensuring a sufficient supply of housing lands/sites which may include a flexible approach in the zoning of land for housing.

10. Indeed, the Draft Guidelines state that ‘In providing housing sites for development within settlements, **it may be necessary to zone more serviced land and sites for residential** (or a mixture of residential and other uses), **than would equate to meeting precisely the projected housing demand for that settlement’ [our emphasis].**

11. The Draft Guidelines confirm that ‘This approach recognises that a degree of choice in development sites to be provided locally is desirable to avoid restricting the supply of new housing development through inactivity on a particular landholding or site’ [our emphasis].

12. In terms of the impact on a Core Strategy, the Draft Guidelines advise that ‘...in certain instances a planning authority may therefore provide zoned residential sites in addition to those required to meet the settlement housing supply target’ [our emphasis].

13. The Draft Guidelines advise that if a planning authority considers it necessary to employ the mechanism for ‘Additional Provision’ of residential lands in a particular settlement, that this must be clearly set out in the Core Strategy. The Draft Guidelines then set out specific criteria (i.e. a – h on pg. 55) to be considered if seeking to identify an additional housing land provision.

14. It is further noted that the Draft Guidelines state that ‘Development Plans **will be monitored** and evaluated on the basis of their progress towards delivering their housing supply target, the location of new housing and the extent of development of any additional land and sites provision’ [our emphasis].

### Devising the Settlement Strategy

15. Another key component of the Core Strategy is the requirement to devise a 'Settlement Strategy' which comprises those elements of Section 10(2A) of the Planning Act that relate to housing, land, population and the settlement hierarchy.
16. The Draft Guidelines state that a settlement strategy comprises those elements of Section 10(2A) of the Planning Act that relate to housing, land, population and the settlement hierarchy.
17. The Draft Guidelines then advise that 'The **settlement hierarchy** is the **defining vision** for how the county or city is likely to **grow and develop** over the lifetime of the development plan, with a **clear set of spatial priorities identified**. The **settlement strategy** of the plan is the **means by which spatial choices are made and priorities expressed**. The **totality of the core strategy articulates the detail of this** for the local authority area **as a whole and for each settlement**, in terms of targeted housing provision **and land-use zoning proposals**' [our emphasis].
18. Accordingly, the Draft Guidelines advise that '...the settlement strategy of the development plan should provide nationally and regionally consistent, as well as **additional local direction**, on the **anticipated future development of all settlements...**' [our emphasis].
19. In formulating a sustainable settlement strategy for the county, the Draft Guidelines require '...a holistic, evidence based analysis... which examines a range of interrelated factors. Key Considerations to be examined include:
  - *Overall Population and Housing Supply Target parameters;*
  - *Existing Settlement Structure **and Settlement Capacity Audit**;*
  - *Development Density;*
  - *Recent Pattern of Population and Housing Growth;*
  - *Local Context.*

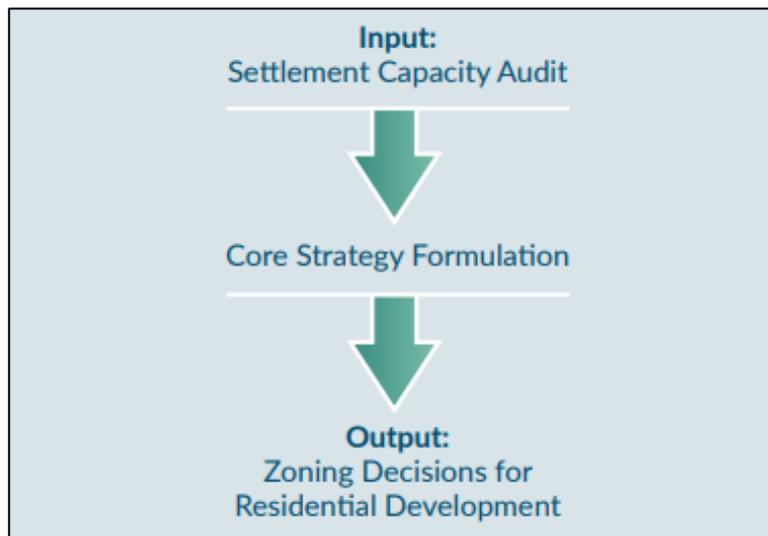
### Settlement Capacity Audit (SCA)

20. The Draft Guidelines confirm that 'In principle, the greatest proportion of targeted population and housing growth should generally **align with the larger settlements...**' [our emphasis].
21. In terms of the distribution of population and housing targets to the various settlements in the settlement hierarchy, including rural areas, the Draft Guidelines state that this '...will require **a rigorous, evidence-based assessment**' [our emphasis].
22. Importantly, the Draft Guidelines confirm 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' [our emphasis].

23. Furthermore, the Draft Guidelines state the following:

*'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)<sup>67</sup>. This is to... **inform the core strategy considerations** set out in Section 4.4 above' [**our emphasis**].*

24. The Draft Guidelines contain the following figure which highlights the importance of the SCA in terms of informing the Core Strategy which then informs zoning decisions.



25. The SCA requires an infrastructural assessment of lands within and adjacent to settlements as a key research input to the settlement strategy formulation process. Indeed, the Draft Guidelines advise that *'At the most basic site level, this infrastructural assessment must include the following infrastructure categories:*

- *Road access*
- *Footpath access*
- *Cycle access*
- *Foul sewerage drainage*
- *Water supply*
- *Surface water drainage*'.

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<sup>67</sup> Aligns with NPO72a of the NPF which states: *Planning authorities will be required to apply a standardised, tiered approach to differentiate between i) zoned land that is serviced and ii) zoned land that is serviceable within the life of the plan.* Further information regarding this is provided in Appendix 3 of the NPF: A Methodology for a Tiered Approach to Land Zoning.

26. Indeed the Draft Guidelines note that proposals to facilitate housing development through zoning ‘...**must be firmly grounded** in the knowledge that appropriate services are/will be available to enable development within the plan period **in order for the core strategy to be realisable in practice**’ [our emphasis].
27. We further note that the SCA exercise ‘...must also include an examination of the **capacity for new residential development** within the Built-Up Footprint of existing settlements in line with compact growth priorities of national planning policy<sup>68</sup>’ [our emphasis].
28. In practice, the Settlement Capacity Audit is to ‘...further develop and update the ‘Residential Land Availability’ (RLA) dataset<sup>69</sup> previously undertaken by planning authorities in 2014’.
29. Section 4 of the Draft Guidelines concludes with SPPR DPG 6, which states:

*SPPR DPG 6 - Further to Sections 10(1A) and 10(2A) of the Planning Act, a development plan core strategy shall include a core strategy statement that sets out:*

- *Consistency with national and regional spatial strategy and policy, with particular reference to the total quantum of additional housing and population targeted over the six-year plan period;*
- *The **total quantum of existing and proposed land zoned for residential use to achieve the additional housing and population targeted over the six-year plan period** [our emphasis];*
- *The rationale for the settlement strategy, that informs the settlement hierarchy, **which must address each settlement and area type in the hierarchy** [our emphasis].*

#### **Zoning in the Development Plan**

30. The Draft Guidelines provide specific guidance with respect to the approach to land use and recommend that ‘...in most cases, that **land-use zoning** decisions **should not be deferred** to subsequent **local area plan processes**’ so as to ‘...avoid a scenario whereby the development plan core strategy **may be subject to challenge** and effectively **undermined in a separate statutory process**’ [our emphasis].
31. The Draft Guidelines advise 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** including:
- (iv) **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;

<sup>68</sup> National Planning Objectives 3a-c

<sup>69</sup> Residential Land Availability Survey 2014, Summary Report, DECLG, February 2015

- (v) **Ensuring certainty** by avoiding a scenario whereby lands are not zoned or inappropriately zoned **in separate statutory processes**;
- (vi) **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**;
- (vii) **Enabling local area plan preparation to concentrate on detailed planning** for layout, design, community facilities, transport, recreational amenities, etc. **at a local level**' [our emphasis].

32. The Draft Guidelines conclude this section by confirming 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' [our emphasis].

#### **Office of Planning Regulator's Directions to Kildare County Council**

33. In accordance with the provisions of section 31AM of the Planning Act, the Office of Planning Regulator (OPR) made a submission (dated 8 March 2021) to the Issues Paper for the Kildare County Development Plan 2023 – 2029.

34. The OPR made a number of observations/comments/recommendations within its 13-page submission, and we note the following as they relate to housing supply:

- 'While the Office appreciates that Variation No. 1 to the Kildare County Development Plan 2017-2023 made changes to the population projections and housing need figures in the core strategy to align with the NPF and RSES, **it did not make commensurate changes to the extent of residentially zoned land in the LAPs for the county's towns**' [our emphasis].
- '**Therefore, a critical issue for the forthcoming development plan is to ensure that the extent of land zoned for residential development in the county's towns including settlements that have a statutory LAP is aligned with the population projections and housing need allocations set out in the forthcoming core strategy.** This will be essential to ensure that housing development over the next development plan period is consistent with national and regional policies for compact and sequential development and building centres of scale' [our emphasis].
- 'Having regard to national and regional objectives for population growth, compact growth and regeneration in determining the core strategy, the Office advises that **a significant proportion of the county's future homes arising from the housing supply targets, will need to be allocated to the designated key towns and larger settlements consistent with the RSES (including MASP).** This settlement hierarchy and associated housing supply targets should also inform the quantum of land zoned for residential development in other settlements, with the allowance allocated to the rural remainder' [our emphasis].

- *'The planning authority should **revisit the categorisation and positioning of settlements in the hierarchy** having regard to the asset based approach outlined in the RSES' [our emphasis].*
- *'Your authority is required to ensure that the development plan provides sufficient clarity and certainty in terms of the measures proposed under section 10(2)(n) to direct the preparation of future local area plans made consequent to the development plan. In this regard, **the Office would strongly advise that all land use zoning objectives for your functional area should be included as part of the development plan rather than delayed to the preparation of local area plans**' [our emphasis].*

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