



DRAFT DEVELOPMENT PLAN SUBMISSION

**DRAFT KILDARE COUNTY DEVELOPMENT PLAN 2023-2029
(STAGE II CONSULTATION)**

**Proposed “New Residential” Zoning of
Lands located off the Blessington Road (R410),
Eadestown, County Kildare**

Client: MINTMAC PROPERTIES LIMITED

May 2022

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Core Strategy & Settlement Strategy



EXECUTIVE SUMMARY

This submission is made by Downey, on behalf of our client, Mintmac Properties Ltd, in relation to proposed zoning of the lands located off the Blessington Road (R410), Eadestown, County Kildare. This is submitted to Kildare County Council in the context of the Draft Kildare County Development Plan 2023-2029, which is currently on public call for submissions. The grounds and justifications to the following submission are summarised as follows:

- *Demographic profile of County Kildare illustrating an ever-growing population since 1991 with a steady demand for housing, a legacy of un-activated planning permissions and unmet demand from the previous Plan period.*
- *Locational attributes of the lands, firstly rendered as “Areas Under Strong Urban Influence” under the draft County Development Plan which essentially shows a growing demand, second convenience distance from both Naas and Blessington which makes the site a prime location for housing delivery.*
- *Existing capacity in terms of community services in the likes of a primary school, a creche, and a GAA club all having a remarkable catchment, which provides for ascending Eadestown in the settlement hierarchy of the County if a balanced development for the village is targeted.*
- *The emerging patterns of development as a result of Covid-19 pandemic outbreak which appears as amenity-driven in-migrated flows of population providing for a rural renaissance.*
- *The zoning of the lands for housing and development can bring about significant community gain in the form of new infrastructure, community and playing pitches as well as large areas of public open space.*
- *It will create a plan-led, sustainable alternative to one-off rural housing in the open countryside.*
- *The instances of Clogherinkoe and Kilkea, which were both rural nodes, and with very similar conditions to the case of Eadestown have moved up in the Hierarchy Settlement of the County as proposed in the draft County Development Plan.*



Funbugs Childcare

Rathmore National
School

Subject Site

EADESTOWN

Church

Eadestown GAA
Club

R410

R410

Blessington

Naas

Location of the Subject Lands

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Indicative Sketch Layout of the Subject Lands

Rev	Initial	Date	Revision Description

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D C W N E Y

This planning submission is made in response to the statutory review of the Kildare County Development Plan. Stage 2, known as the 'Draft' stage, requires submissions to be of a site-specific nature. Accordingly, this submission has been prepared in the context of "Draft Kildare County Development Plan" which sets out the vision for how Kildare should develop over the life of the Plan while ensuring compliance with national and regional policy. The Development Plan presents an opportunity for the general public to shape Kildare for the future when it comes to important issues such as housing, economic development, community and heritage. We would therefore respectfully request that Kildare County Council consider the content within this planning submission. Downey Planning would like to thank the Council for the opportunity to make this submission, on behalf of our clients Mintmac Properties Limited.

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Downey Planning Document Control			
	Name	Date	Version
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1.0 INTRODUCTION

Downey, Chartered Town Planners, 29 Merrion Square, D02 RW64, have prepared this submission to the Draft Kildare County Council Development Plan 2023-2029. This submission is made on behalf of our client, Mintmac Properties Limited, 29 North Anne Street, Dublin 7, in relation to the zoning objectives of the lands located off the Blessington Road (R410), Eadestown, County Kildare.

This written submission is made in response to an invitation for comments from interested parties by Kildare County Council. This submission is being made within the specified timeframe for submissions i.e., 24th May 2022, as set out on the Draft Development Plan's public notice.

2.0 LEGISLATIVE BASIS

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

"11.—(1) Not later than 4 years after the making of a development plan, a planning authority shall give notice of its intention to review its existing development plan and to prepare a new development plan for its area.

(2) A notice under subsection (1) shall be given to the Minister, any prescribed authorities, any adjoining planning authorities, the Board, any relevant regional authority and any town commissioners and city and county development boards within the functional area of the authority and shall be published in one or more newspapers circulating in the area to which the development plan relates and shall—

(a) state that the planning authority intends to review the existing development plan and to prepare a new development plan,

(b) indicate that submissions or observations regarding the review of the existing plan and the preparation of a new development plan may be made in writing to the planning authority within a specified period (which shall not be less than 8 weeks),

(c) indicate the time during which and the place or places where any background papers or draft proposals (if any) regarding the review of the existing plan and the preparation of the new development plan may be inspected.

(3) (a) As soon as may be after giving notice under this section of its intention to review a development plan and to prepare a new development plan, a planning authority shall take whatever additional measures it considers necessary to consult with the general public and other interested bodies.

(b) Without prejudice to the generality of paragraph (a), a planning authority shall hold public meetings and seek written submissions regarding all or any aspect of the proposed development plan and may invite oral submissions to be made to the planning authority regarding the plan.

(c) In addition to paragraphs (a) and (b), a planning authority shall take whatever measures it considers necessary to consult with the providers of energy, telecommunications, transport and any other relevant infrastructure and of education, health, policing and other services in order to ascertain any long-term plans for the provision of the infrastructure and services in the area of the planning authority and the providers shall furnish the necessary information to the planning authority.

(4) (a) Not later than 16 weeks after giving notice under subsection (1), the manager of a planning authority shall prepare a report on any submissions or observations received under subsection (2) or (3) and the matters arising out of any consultations under subsection (3).

(b) A report under paragraph (a) shall—

(i) list the persons or bodies who made submissions or observations under this section as well as any persons or bodies consulted by the authority,

(ii) summarise the issues raised in the submissions and during the consultations, where appropriate,

(iii) give the opinion of the manager to the issues raised, taking account of the proper planning and sustainable development of the area, the statutory obligations of any local authority in the area, and any relevant policies or objectives for the time being of the Government or of any Minister of the Government, and (iv) state the manager's recommendations on the policies to be included in the draft development plan.

(c) A report under paragraph (a) shall be submitted to the members of the planning authority, or to a committee of the planning authority, as may be decided by the members of the authority, for their consideration.

(d) Following the consideration of a report under paragraph (c), the members of the planning authority or of the committee, as the case may be, may issue directions to the manager regarding the preparation of the draft development plan, and any such directions must take account of the statutory obligations of any local authority in the area and any relevant policies or objectives for the time being of the Government or of any Minister of the Government, and the manager shall comply with any such directions.

(e) Directions under paragraph (d) shall be issued not later than 10 weeks after the submission of a report in accordance with paragraph (c).

(f) In issuing directions under paragraph (d), the members shall be restricted to considering the proper planning and sustainable development of the area to which the development plan relates.

(5) (a) The manager shall, not later than 12 weeks following the receipt of any directions under subsection (4)(d), prepare a draft development plan and submit it to the members of the planning authority for their consideration.

(b) The members of a planning authority shall, as soon as may be, consider the draft development plan submitted by the manager in accordance with paragraph (a).

(c) Where the draft development plan has been considered in accordance with paragraph (b), it shall be deemed to be the draft development plan, unless, within 8 weeks of the submission of the draft development plan under paragraph (a), the planning authority, by resolution, amends that draft development plan."

This submission to the pre-draft of the Development Plan is being made in accordance with Section 11(2)(b) and 3(b) of the Planning and Development Act 2000 (as amended) and is being submitted within the specified timeframe (24th May 2022) as set out in the Draft Kildare County Development Plan 2023-2029 public notice.

3.0 SITE LOCATION & DESCRIPTION

The subject lands are located off the Blessington Road (R410) Regional Road, Eadestown, Co. Kildare. The lands are to the east of County Kildare, close to the Kildare-Dublin and Kildare Wicklow legislative boundaries, encompassing the south-eastern part of the Eadestown village. The lands are situated c. 7km to the south-east of Naas with appropriate levels of accessibility to both Naas and Blessington via Blessington Road (R410), i.e., approximately 7-minute driving distance or 21-minute cycling distance from Naas and 9-minute driving distance or 20-minute cycling distance from Blessington. Eadestown itself has all the social and community infrastructure associated with a village including a school, childcare facility, community centre, GAA club, church, graveyard and small car park.



Figure 1. Strategic Location of the Subject Lands (approximate boundaries of the lands are outlined in red with 1-2km buffer zones off the centre of the lands dashed in light grey)

With an approximate area of 19 hectares, the subject site is bounded to the west by Newtown Grove, to the north by Rathmore National School and greenfield lands, to the south by Blessington Road (R410) Regional Road, and to the east by greenfield lands. It is also noted that Eadestown GAA club is located c. 1.5km to the south of the subject lands, which is a 6-minute cycling distance or 20-minute walking distance from the site.

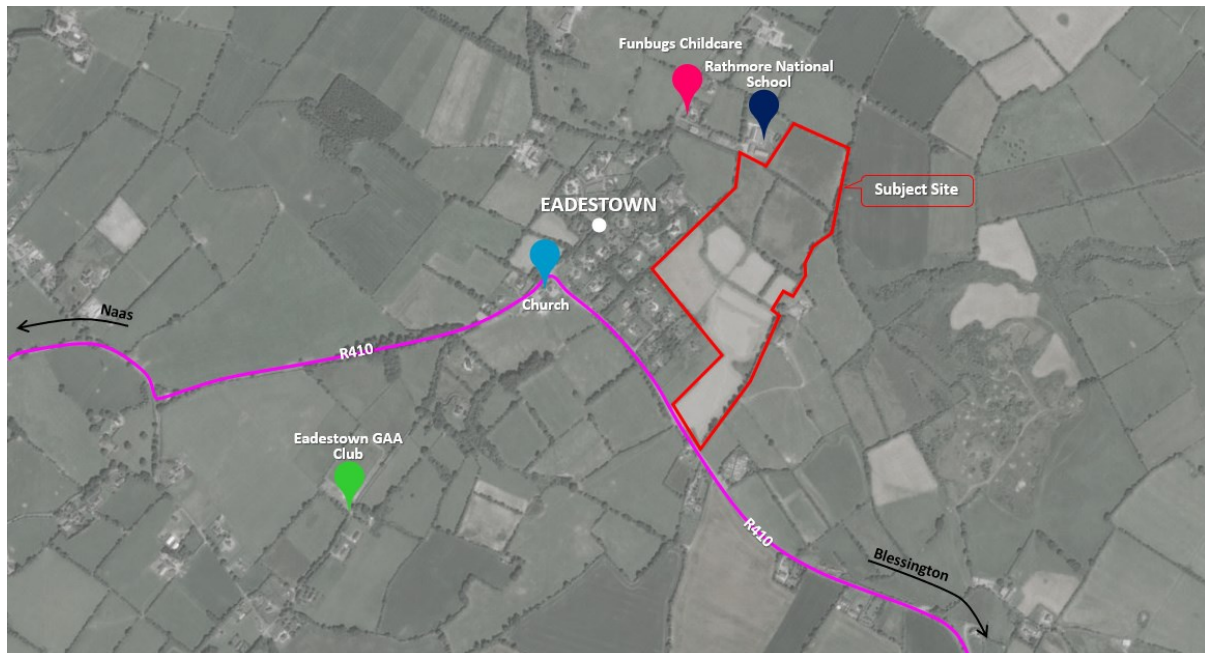


Figure 2. Subject Lands within the Context of Existing Community Amenities (approximate boundaries of the lands are outlined in red)

The built environment to the west of the lands consists of this well-established ribbon dwellings, known as Newtown Grove, which is characterised by detached single- and two-storey family houses with spacious, mostly landscaped gardens and in-curtilage car parking spaces.

The subject lands are currently in agricultural use. It lies in a single block and is divided by mature trees and hedgerows. A small stream passes through the centre of the lands. The lands are accessed at the south-western corner via the Blessington Road (R410), with a collection area for livestock situated adjacent to the entrance.



Figure 3. Aerial View of the Application Site (approximate boundaries of the subject site outlined in red)



Figure 4. Bird's Eye View of the Application Site (approximate boundaries of the subject site outlined in red)

4.0 PLANNING HISTORY

Downey have carried out a detailed examination of the planning history of the subject site, which determined that there have been no planning applications made on the subject lands.

5.0 PLANNING CONTEXT

5.1 Project Ireland 2040: National Planning Framework

The National Planning Framework (NPF) is *“the Government’s high-level strategic plan for shaping the future growth and development of our country out to the year 2040”*. It is a Framework to guide public and private investment, to create and promote opportunities for our people, and to protect and enhance our environment, from our villages to our cities and everything in between. It is stated within the NPF that, *“a major new policy emphasis on renewing and developing existing settlements will be required, rather than continual expansion and sprawl of cities and towns out into the countryside, at the expense of town centres and smaller villages.”* The NPF states that, *“Well over a third of Irish people live outside cities and towns and this proportion increases to half of the population, if smaller towns and villages are included.”* The document goes on to add, *“Rural Ireland has faced challenges in recent decades, such as the loss of traditional industries and employment, emigration and poor connectivity. The emergence of new technologies and improved infrastructural connectivity provide opportunities for diversification into new employment sectors and to build on the success of many Irish and foreign-owned companies supporting employment in rural areas.”*

Outlined in the NPF, building on Government policy and the 2017 Action Plan for Rural Development, a major focus on rural areas have been made in this document and this is in relation to:

- *“Strengthening Ireland’s rural fabric and supporting the communities who live there;*

- *Planning for the future growth and development of rural areas, including addressing decline, with a special focus on activating the potential for the renewal and development of smaller towns and villages;*
- *Putting in place planning and investment policies to support job creation in the rural economy;*
- *Addressing connectivity gaps;*
- *Better co-ordination of existing investment programmes dealing with social inclusion, rural development and town and village renewal."*

As stated in the NPF, *"the Central Statistics Office (CSO) defines rural as the areas outside settlements with a population of 1,500 or more people. This includes smaller settlements of fewer than 1,500 people, home to around 20% of the population of rural areas, and individual dwellings in the countryside, which together comprised approximately 37% of the population in 2016. This reflects Ireland's historic rural and village settlement pattern."* It also adds that, *"in support of the overall pattern of rural and small-town development in Ireland, this Framework seeks to protect areas that are under strong urban influence from unsustainable over-development on the one hand, and to encourage population to be sustained in more structurally weak areas, that have experienced low growth or decline in recent decades, on the other, while sustaining vibrant rural communities."* As such, **NPO 15** of the NPF seeks to:

"Support the sustainable development of rural areas by encouraging growth and arresting decline in areas that have experienced low population growth or decline in recent decades and by managing the growth of areas that are under strong urban influence to avoid over-development, while sustaining vibrant rural communities."

Iterated in the NPF, *"opportunities exist to create the conditions to support residential development in rural towns, whether through parking and streetscape improvements, traffic diversions, the provision of small-scale urban amenities such as open spaces or playgrounds, the acquisition of key sites and/or the opening up or amalgamation of 'backlands' for residential development and the provision of services such as waste-water treatment."* According to **NPO 18a**, the NPF seeks to:

"Support the proportionate growth of and appropriately designed development in rural towns that will contribute to their regeneration and renewal, including interventions in the public realm, the provision of amenities, the acquisition of sites and the provision of services."

Furthermore, the NPF states that *"in rural Ireland, many people seek the opportunity to build their own homes but find it difficult to do so in smaller settlements because of a lack of available sites and services. In order to assist this, local authorities will be supported in undertaking the necessary land acquisition, site preparation and local infrastructure provision to deliver self-build development options in smaller towns/villages."* As per **NPO 18b** of the NPF seeks to:

"Develop a programme for 'new homes in small towns and villages' with local authorities, public infrastructure agencies such as Irish Water and local communities to provide serviced sites with appropriate infrastructure to attract people to build their own homes and live in small towns and villages."

In the same context and with respect to the countryside, the NPF adds, *“the Irish countryside is, and will continue to be, a living and lived-in landscape focusing on the requirements of rural economies and rural communities, based on agriculture, forestry, tourism and rural enterprise, while at the same time avoiding ribbon and over-spill development from urban areas and protecting environmental qualities.”*

It is recognised that there is a continuing need for housing provision for people to live and work in Ireland’s countryside. Careful planning is required to manage demand in our most accessible countryside around cities and towns, focusing on the elements required to support the sustainable growth of rural economies and rural communities.”

Outlined in the NPF, *“It will continue to be necessary to demonstrate a functional economic or social requirement for housing need in areas under urban influence, i.e., the commuter catchment of cities and large towns and centres of employment. This will also be subject to siting and design considerations.”*

In terms of synergetic relationship of settlements and community amenities and the vitality of keeping a balance between the two, the NPF states, *“in many parts of rural Ireland, where a significant majority of housing output is in the countryside, this has contributed to spatial and social imbalance and the decline in population of smaller settlements. As a result, many key services have closed, in part due to population decline, leaving more marginalised and vulnerable citizens without access to those services.”*

With respect to the above-mentioned, the **NPO 19** of the NPF seeks to:

“Ensure, in providing for the development of rural housing, that a distinction is made between areas under urban influence, i.e., within the commuter catchment of cities and large towns and centres of employment, and elsewhere:

- *In rural areas under urban influence, facilitate the provision of single housing in the countryside based on the core consideration of demonstrable economic or social need to live in a rural area and siting and design criteria for rural housing in statutory guidelines and plans, having regard to the viability of smaller towns and rural settlements;*
- *In rural areas elsewhere, facilitate the provision of single housing in the countryside based on siting and design criteria for rural housing in statutory guidelines and plans, having regard to the viability of smaller towns and rural settlements.”*

Stated in the NPF, *“at a local level, the core strategy of county development plans will account for the demand for single housing in the countryside. This will be related to the local authority’s overall Housing Need Demand Assessment (HNDA) that will be required to be undertaken in future planning. Quantifying the need for single housing on an evidence basis will assist in supporting the preparation of a comprehensive housing strategy and associated land use policies.”* As per **NPO 20** of the NPF seeks to:

“Project the need for single housing in the countryside through the local authority’s overall Housing Need Demand Assessment (HNDA) tool and county development plan core strategy processes.”

Also, it is crucial to note that in terms of pressure to meet the growing population, the NPF outlines that *“increases in population, economic growth, higher levels of food demand, transitioning to a more sustainable energy market and conservation goals will ultimately result in increased competition for suitable land to facilitate these accumulating pressures. Some parts of Ireland are more suitable than others for facilitating particular national sectoral aims by reason of physical factors, environmental sensitivities, land capacity and existing settlement patterns.”*

With respect to the above, the proposed zoning of the lands subject to this submission would provide for housing delivery in the Eadestown Electoral Division, where this well-established village with existing community amenities such as school, creche, and sport facility, experienced a declining population over the intercensal period, decreasing from 201 persons in 2011 to 194 persons in 2016. The proposal is submitted to arrest decline in Eadestown by opening up development opportunities in an already serviced village, which consequently contributes to a sustaining community.

This is also discussed from a Housing Need and Demand Assessment point of view under following sub-sections of current and draft Kildare County Development Plans, which we invite the Council to refer to.

Therefore, the proposal is suggested to be in line with the NPF by strengthening the socio-economic fabric of Eadestown, where it builds up additional capacity for unmet demand and demographic pressures for services in an area where it is already serviced. This is also believed to prevent possible close down of existing community services by reversing population decline in the area.

5.2 Housing for All: A New Housing Plan for Ireland

The Housing for All: A New Housing Plan for Ireland states that Ireland’s housing system is not meeting the needs of enough of our people, and therefore, it needs to increase new housing supply to an average of at least 33,000 new units per year over the next decade. This will include over 10,000 social homes each year over the next five years, with 9,500 of these being new-builds, and an average of 6,000 affordable homes for purchase or rent. As per, Housing for All provides four pathways to achieving four overarching objectives:

- Supporting home ownership and increasing affordability;
- Eradicating homelessness, increasing social housing delivery, and supporting social inclusion
- Increasing new housing supply; and
- Addressing vacancy and efficient use of existing stock.

Outlined in the Plan, the State must act decisively to increase supply of both private and public housing. An average of 33,000 homes must be provided every year between now and 2030. Increased housing output is needed in all sectors - private, affordable, and social - to meet the needs of people in a wide variety of circumstances. As stated in the Housing for All, it may be necessary for the Local Authority to zone more serviced land in a development plan than would equate to meeting precisely

the projected housing demand for that settlement, to provide choice in sites locally and to avoid restricting the supply new housing development through inactivity on a particular landholding.

It is submitted that the provision for residential units on the subject lands would help the Government to achieve the objectives of the Housing for All Plan by unlocking serviced lands which are located within convenience distance from both Naas and Blessington. This would also support choice in sites locally when measuring development in the context of Naas and its environs and with respect to the fact that Eadestown is not a residential estate solely, but it also enjoys supporting community amenities. Therefore, it is submitted that the proposed development is consistent with the development framework in this regard.

5.3 The Housing Agency Statement of Strategy 2022-2024

Launched in late January 2022, the Housing Agency's Statement of Strategy, outlines how more affordable housing, increasing the supply of social and private homes and addressing social inclusion issues such as homelessness and ageing will be the priorities for the work of the Housing Agency over 2022-2024. The Statement of Strategy frames the work of The Housing Agency under three broad themes:

- Being a centre for housing knowledge;
- Bridging housing supply and demand; and,
- Building capacity for housing.

It also outlines how, over the coming years, the Housing Agency will use research, informed policy insights and data to work *"to achieve a housing system that meets the housing needs of the nation and promotes viable, sustainable communities"*.

The Housing Agency's Strategic Plan 2022-2024 has been framed in the context of supporting Housing for All, the Government's housing plan for Ireland and key trends in the housing system including:

- Diverse and changing housing needs for people living in Ireland.
- Long-term government policy and strategic planning for the Irish housing system.
- A continuing focus on building inclusive, sustainable communities.

It is submitted that the evidence-based approach outlined in Section 7 of this submission is consistent with the overarching strategy of the Housing Agency, where reversing Eadestown population decline and sustaining the existing community is aimed by providing for an optimal balance of existing community provision and residential developments in the settlement.

5.4 Regional Spatial and Economic Strategy 2019-2031 (RSES)

The Regional Spatial and Economic Strategy (RSES) was published by the Eastern and Midland Regional Assembly. The RSES outlines the long-term regional level strategic planning and economic framework in support of the National Planning Framework for the period 2019-2031, by identifying regional assets, opportunities, pressures and constraints and providing a framework for investment to better manage spatial planning and economic development throughout the Eastern and Midland Region.

With a vision *"to create a sustainable and competitive Region that supports the health and wellbeing of our people and places, from urban to rural, with access to quality housing, travel and employment"*

opportunities for all”, the RSES, in conjunction with the NPF, introduces the Core Region as “the peri-urban ‘hinterlands’ in the commuter catchment around Dublin, which covers the Mid-East counties of Louth, Meath, Kildare and Wicklow, extending down the East Coast and into parts of the Midlands. More than 550,000 people reside in the Core Region in 2016.” As reiterated in the RSES, “the Mid-East has seen the highest ten-year population growth to 2016 in the Region and contains some of the youngest and fastest growing towns in the state.”

Outlined in the RSES, “the Core Region contains a strong network of county and market towns that have a good level of local employment, services and amenities, which serve not just their resident populations but a wider catchment area. These include Arklow, Balbriggan, Drogheda, Navan, Naas, Newbridge and Wicklow. These towns have capacity for continued commensurate growth to become more self-sustaining and to attract high quality knowledge-based employment at strategic accessible locations.”

The RSES states that, “in order to achieve these targets and the delivery of new homes within the footprint of existing settlements, active land management responses are required to ensure that land and building resources within existing settlements are used to their full potential.” This includes settlements within the Core Region, such as Eadestown.

In this regard, “growth enablers for the Core Region include:

- *To promote continued growth at more sustainable rates, while providing for increased employment and improved local economies, services and functions to allow towns become more self-sustaining and to create the quality of life to attract investment.*
- *Commensurate population and employment growth in Key towns, coupled with investment in enabling transport, infrastructure and services to facilitate the achievement of compact growth targets of at least 30% of all new homes to be within the existing built-up area of settlements.*
- *‘Catch up’ investment to promote consolidation and improvement in the sustainability of those areas that have experienced significant population growth but have a weak level of services and employment for their residents.*
- *Diversification and specialisation of local economies with a focus on clustering, smart specialisation, place making and urban regeneration to create the quality of life to attract FDI and indigenous investment and increase high value knowledge-based employment including second site and relocation opportunities.*

With respect to the above, building upon growth enablers would facilitate development at a more sustainable rate, which in this instance, is suggested to be the existing community amenities and appropriate travel distances from both Naas and Blessington that represents Eadestown as a serviced village capable of accommodating further growth. This would direct a portion of growth pressure from Naas to Eadestown, also provide for sustaining development of Eadestown.

5.5 Kildare County Development Plan 2017-2023

Eadestown is designated within the County Development Plan as a “Rural Node” within the rural hinterland, which as per the same, are classed as rural one-off dwellings. Outlined in the Development Plan, “Rural Settlements and Rural Nodes are located throughout the county. It is proposed that

settlements will develop as local centres for rural catchments with growth appropriate to cater for local demand. Lower densities will be encouraged in appropriate locations to provide alternatives to one-off rural dwellings in the immediate rural area. Expansion will be controlled to minimise pressure on services, the environment and unsustainable commuting patterns. Rural Settlements have a higher order function than Rural Nodes. Rural Nodes comprise largely un-serviced areas with limited social and community infrastructure and will accommodate limited development at a sustainable scale for local demands by way of small-scale cluster developments.” The County Development Plan also adds, *“it is anticipated that each rural node can cater for a 10-15% population growth from their current population base over the period of the Plan.”*

As stated in the County Development Plan, *“all towns, villages, settlements, rural nodes (as appropriate) should be developed in a sequential manner, with suitable undeveloped lands closest to the core and public transport routes being given preference for development in the first instance. Zoning shall extend outwards from the centre of an urban area with strong emphasis placed on encouraging infill opportunities. Areas to be zoned should generally be contiguous to existing zoned development lands.”*

More specifically, the County Development Plan states, *“Rural Nodes serve as areas where members of the rural community can live as an alternative to housing in the open countryside. The Settlement Strategy encourages appropriate levels of consolidation. Many Rural Nodes have a more residential focus with fewer services available than the villages. Existing nodes are diverse in their role and function within the rural area. Consideration of planning applications for development within the nodes will have regard to the role and form of the node within the wider rural area with particular care being taken that these settlements do not compete with villages in the services they provide or the role and function they play within the rural area.”* As per **RH 25** of the County Development Plan, it is the policy of the Council to:

“Facilitate the following types of applications for housing in the rural nodes:

- (i) Individual one-off houses subject to applicants meeting the local need criteria identified in the Plan (refer to Map 4.4 and Table 4.3).*
- (ii) Small scale clusters of dwellings/serviced sites of not more than 5 housing units for applicants/occupants complying with local need criteria (refer to Map 4.4 and Table 4.3), and subject to the provision of appropriate physical infrastructure.”*

The County Development Plan also provides room for rural housing provision within rural settlements including rural nodes as outlined in the **RO 4** of the Plan, seeking to:

“Investigate the feasibility of providing/facilitating serviced sites in rural nodes, villages, settlements and small town to cater for rural generated housing demand for persons who meet the criteria set out in Table 4.3 Schedule of Local Need, as an alternative to housing in the rural countryside.”

Stated in the County Development Plan, *“the population target for Kildare to the end of the Plan period is 253,600, giving rise to the need for 32,497 additional residential units by 2023. This equates to a population increase of 17% over 2011 levels.*

The distribution of housing targets over the plan period, in accordance with the Core Strategy is outlined in the Table below. It should be noted that in calculating unit projections, the RPGs apply a standardised vacancy rate of 6.5% to reflect the need for the market to operate efficiently and to allow for the normal turnover of the housing stock.

In the RPGs the four Metropolitan towns of Maynooth, Celbridge, Leixlip and Kilcock must accommodate a minimum of 35% of the total growth rate allocation for the county. This target will increase their share of the total population in the county from 25% in 2011 to 27% in 2023.

The RPGs objective is to allocate growth within the Hinterland towns of Naas and Newbridge and to consolidate growth in Kildare, Athy, Monasterevin and Kilcullen. This is achieved by allocating a minimum 41% of the total growth rate for the county to these towns. This will increase their share of the total population in the county from 32% in 2011 to 35% in 2023.”

As marked on the Table below, County Development Plan planned to accommodate 24% (or 7,727 no. dwellings) within the Rural Areas, including Rural Nodes.

	Settlement	Housing Unit Allocation 2016-2023	% County Total	% Allocation Metropolitan/ Hinterland
Metropolitan Allocation	Leixlip Maynooth Celbridge Kilcock	11,406	35%	35%
Hinterland Town Allocation	Naas Newbridge Kildare Monasterevin Athy Kilcullen	13,356	41%	65%
Rural Areas	Small Towns, Villages, Rural Settlements, Rural Nodes, One-off Rural Housing	7,727	24%	
Total		32,497	100%	

Figure 5. Housing Allocation 2016-2023 extracted from the County Development Plan

With respect to the above-mentioned and regarding the existing community infrastructure capacity in Eadestown, including a primary school, a childcare facility, and sport facilities. In addition, Eadestown is located in appropriate travelling distances from both Naas and Blessington, as main employment hubs to this settlement. These existing capacities suggested to support further expansion of Eadestown, also keeping within the 10-15% threshold of population growth for rural nodes outlined in the County Development Plan.

5.6 Naas Local Area Plan 2021-2027

The Naas Local Area Plan 2021-2027 has been prepared by Kildare County Council in accordance with the requirements and provisions of the Planning and Development Act 2000 (as amended). The Plan

sets out an overall strategy for the proper planning and sustainable development of Naas in the context of the Kildare County Development Plan 2017-2023 (as varied), the National Planning Framework (2018), the Regional Spatial and Economic Strategy for the Eastern and Midland Region, and the Kildare County Council Climate Change Adaptation Strategy 2019-2024.

It is also informed by Ministerial Guidelines issued pursuant to Section 28 of the Act together with EU requirements regarding Strategic Environmental Assessment (SEA) an Appropriate Assessment (AA), and Strategic Flood Risk Assessment (SFRA). The Plan has also been informed by a Sustainable Planning and Infrastructure Assessment (SPIA), a Social Infrastructure Assessment (SIA) and a Transport Strategy.

Outlined in the LAP, *“Naas is the County Town of County Kildare and in recognition of its status the Regional Spatial and Economic Strategy (RSES) has designated it a Key Town, located in the Core Region of the Eastern and Midland Region. The RSES identifies Key Towns as large towns which are economically active that provide employment for their surrounding areas, with high quality transport links and the capacity to act as regional drivers to complement the Regional Growth Centres.”*

According to the LAP, *“given the proximity and connectivity of Naas to Dublin and being a key employment centre in the Core Region, it will continue to be an attractive place to live. It is anticipated that there will continue to be a strong demand for a varied mix and type of housing within the Plan area, especially for single occupancy units given the limited supply, which can provide the elderly with more suitable housing in order for them to free up larger homes by downsizing. The Plan seeks to address this imbalance by ensuring a greater mix of house types. Residential schemes should provide for both a mix of dwelling size and dwelling type to cater for a diverse range of housing needs.”*

With respect to the above and considering location of subject lands in Eadestown, which are located a close distance from Naas, it is suggested that zoning of the lands would allow for housing delivery in an area with existing strong demand. The type of housing is expected to be large family dwellings, which essentially supports provision for a mix of housing by freeing up zoned lands in Naas to supply for smaller households. Thus, the submission is consistent with the Naas Local Area Plan.

6.0 DRAFT KILDARE COUNTY DEVELOPMENT PLAN 2023-2029

Eadestown is designated within the draft County Development Plan as a “Rural Node”, which as per the same, are classed as rural one-off dwellings. Outlined in the draft County Development Plan, *“The National Planning Framework (NPF) sets out clear guidance and policy objectives (Objective 19) relating to the future growth and development of rural areas across Ireland. It is recognised within NPF that there is a continuing need for housing provision for people to live and work in Ireland’s countryside. Careful planning is required to manage demand in our most accessible countryside around cities and towns.”* As per, the draft County Development Plan identifies “Areas Under Strong Urban Influence” in County Kildare with respect to the following:

- *“High levels of commuting pattern (as per NPF/RSES guidance above)*
- *Proximity to cities/towns or to major transport corridors with ready access to urban areas*
- *Ready access to a good road network with ready access to the larger urban areas”*

With regard to the above and by taking an evidence-based approach utilised with the local knowledge, the Development Plan introduces two rural housing policy zones, including: (1) Areas Under Strong Urban Influence”, and (2) Stronger Rural Areas.

“In ‘Areas under Strong Urban Influence’, it will be an objective of the Council to facilitate the provision of single housing in the countryside based on the core considerations of:

- demonstrable ‘economic or social’ need to live in a rural area and build their home,
- siting, environmental and design criteria for rural housing in statutory guidelines and plans,
- having regard to the viability of smaller towns and rural settlements and the provision and availability of serviced sites in these areas.

In ‘Stronger Rural Areas’, it will be an objective of the Council to facilitate the provision of single housing in the countryside based on siting, environmental and design criteria for rural housing in statutory guidelines and plans, having regard to the viability of smaller towns and rural settlements. It is also recognised that certain parts of the county are of significant scenic value and must be protected to maintain and protect their landscape quality.”

As illustrated in the Rural Housing Zoning Policy map, Eadestown is located within Zone 1, i.e., Areas Under Strong Urban Influence. This indicates that there is a growing demand in the area, and as per the draft Development Plan, the Council also seeks to facilitate the provision of single housing in the

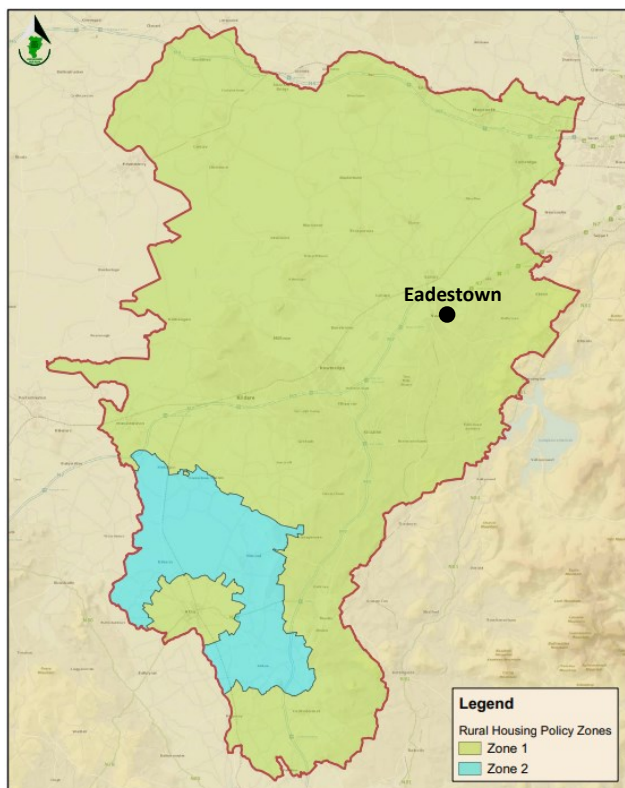


Figure 6. Rural Housing Zoning Policy, 2023-2029

area, though the proposal should be based on demonstrable economic and social grounds, having regard to the environmental and locational attributes of the site and its context.

This is further supported by the Core Strategy of the draft County Development Plan, where Census 2016 revealed that 25% of the overall population residing in the County (222,504 people) are rural dwellers. In line with this existing pattern and in order to keep with the national and regional development and planning policy, the draft County Development Plan suggests 8% of the population and housing targets envisaged for the County over Q1 2023 to Q2 2028 to be allocated to these settlements. This is submitted to be an overall total of 2,012 no. dwellings over Q1 2023 to Q2 2028.

To provide for an insight from the supply side, according to the Appendix 1 of the draft County Development Plan (Housing Need and Demand Assessment), “*Analysis of planning permission data*

from 2010 to Q2 2021, in terms of total units permitted in County Kildare, has been undertaken to assist in projecting the need for single housing in the countryside during the plan period...

The table reveals that the total number of permitted units in County Kildare has trended upwards since 2012, peaking at 5,952 units permitted in 2020 (which includes SHDs), corresponding with positive economic growth following a lag period post 2011. The correlation is noted between the growing economy and the downward number of one-off houses as a percentage of overall units granted. The table does show that from 2016 to 2020, the number of permissions for one-off dwellings averages at 175 per annum. 2021 is emerging as an anomaly in the trend across the board, on foot of the Covid-19 pandemic.

Year	One-Off Houses Permitted	All Dwellings Permitted	One-off houses as a % of all dwellings
2010	170	1021	17%
2011	123	190	65%
2012	83	122	68%
2013	78	307	25%
2014	92	317	29%
2015	108	459	24%
2016	175	736	24%
2017	170	2172	8%
2018	189	4761*	4%
2019	161	3260*	5%
2020	186	5952*	3%
2021	78**	919* **	8%
Average annual rate 2010 - Q2 2021			23%
Average annual rate 2017 - Q2 2021			6%

* Figures include grants of permission under the SHD process

** Up to Q2 2021

Figure 7. Analysis of Permitted Applications for One-Off Houses, Kildare (2010 - Q2 2021)

It is acknowledged that the presence of new rural one-off dwellings between the period 2016 to end of year 2020 does not correlate directly with permissions granted in the same year for the reason of time lag between grants of permission and commencement of development, however it is a good indication of true demand. An additional 892 rural one-off houses constructed between 2016 and end of year 2020 equates generally to 178 houses per annum.

Figures contained in the Table (Permitted Applications for One-Off Houses) indicates that between 2016 and 2020, an average of 176 one-off houses were permitted. While the CSO figure on permitted units includes urban areas, and considering the time lag for commencement, it is still considered a parallel source to gauge rural-one offs. The detailed analysis of planning permissions granted shows that in 2020, 162 permitted dwellings were in the rural areas outside of towns, villages, rural settlements and rural nodes."

Comparing the above-mentioned figures in rural housing delivery against the anticipated rural housing targets in the current County Development Plan set at 7,727 no. dwellings (24% of the County housing target at the time) indicates a considerable remaining balance which can partially be justified by the obstacles over housing supply and inactivity of particular landholdings.

With respect to the foregoing, the zoning of the lands would facilitate housing delivery on a serviced site in a village situated within the Areas Under Strong Urban Influence. This is submitted to be in line with the existing pattern of development and growing demand in the area, also consistent with the Core Strategy and HNDA of the draft County Development Plan. In addition, the active involvement of the applicant in housing delivery is submitted to reduce the risk of inactivity of a zoned land and effectively contribute to the Core Strategy and housing target of the County Development Plan.

7.0 JUSTIFICATIONS & GROUNDS OF SUBMISSION

This submission is proposing a re-zoning of the lands located off the Blessington Road (R410), Eadestown, Co. Kildare to ***“New Residential”*** which seeks to ***“Provide new residential development and other services incidental to residential development”***. The following provides the grounds and justifications to the proposed submissions.

7.1 Upward Demographic Trend of the County

According to Census data, County Kildare population stood at 222,504 people, which made Kildare as the fifth highest population of all local authorities in Ireland. Over a 20-year period from 1996 to 2016, Kildare experienced a 64.8% (+87,512) increase in its population base, which is the second highest rate in the State, compared to the state average of 31.3%. The growth rate experienced between 2006 and 2016 which resulted in an overall increase of 19.4% was the fourth highest in the State.

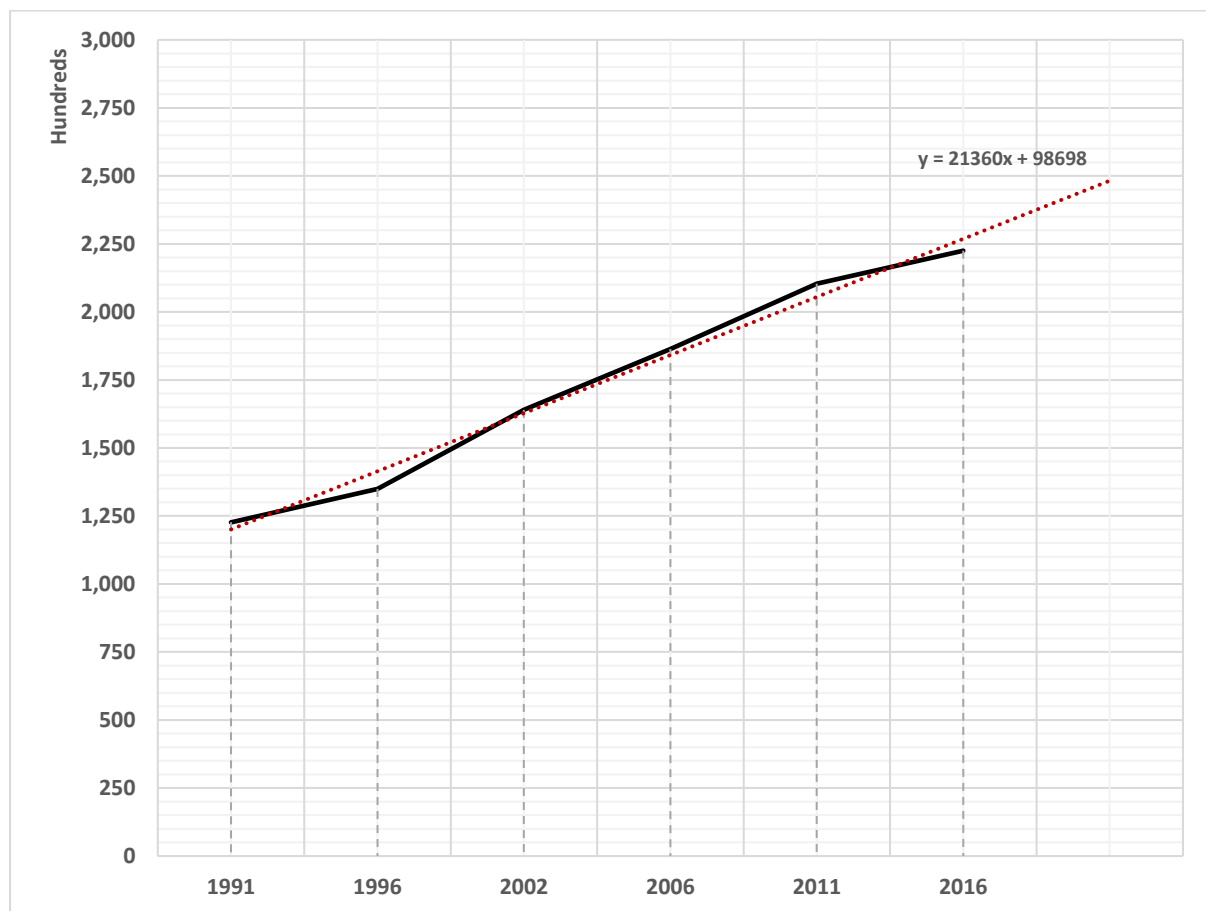


Figure 8. Demographic Trending of County Kildare over the period 1991-2016

This is explained by a strong performance in natural increase (birth rate) and a strong performance in estimated net migration. In comparison, growth rates between 2011 and 2016 have been much slower for all areas across the country. During this period, Kildare increased its population by 5.8%, which is the third highest rate of all local authorities.

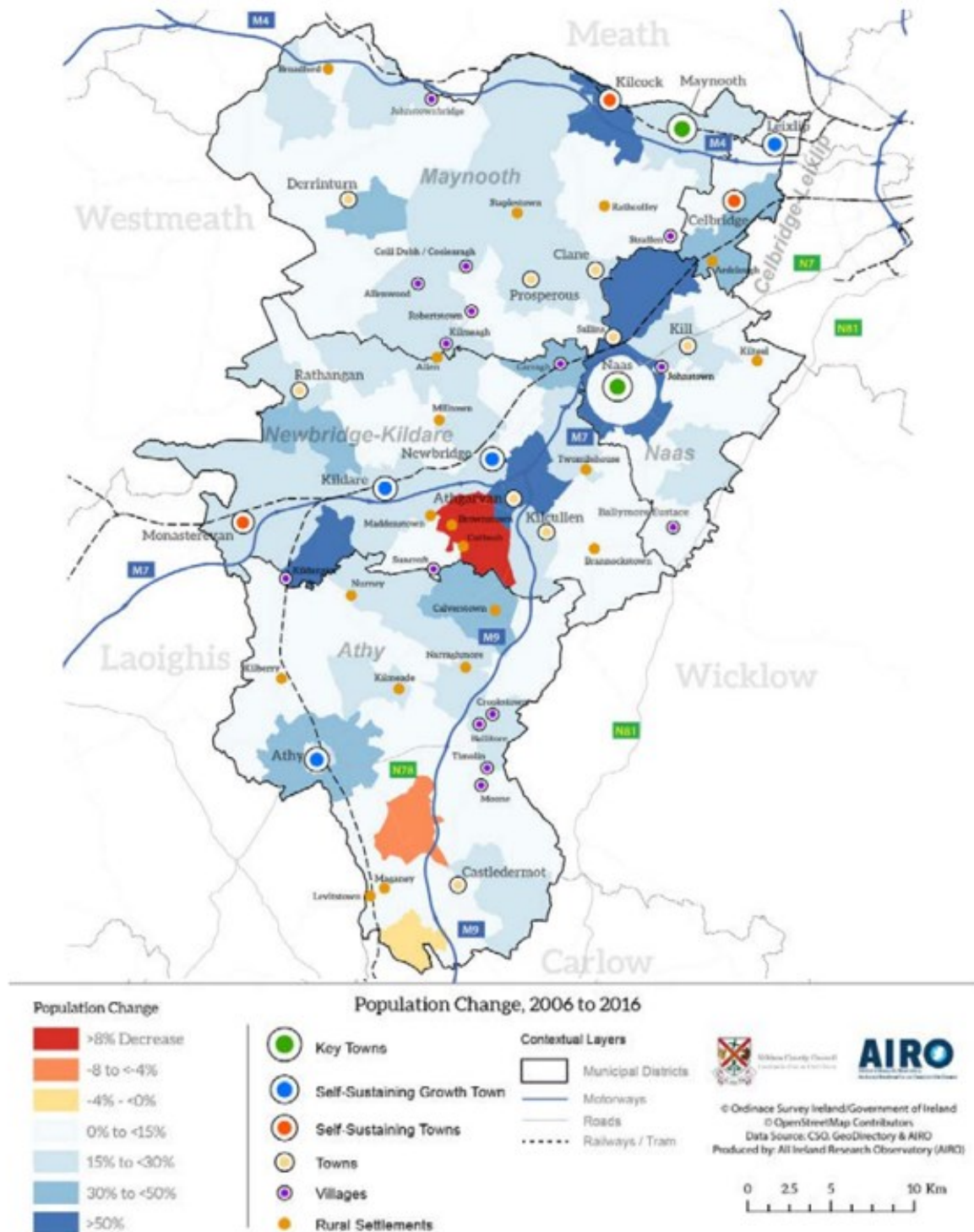


Figure 9. Population Change 2006-2016

At Electoral Division level, between 2006 and 2016, only 6 of the 89 ED's in Kildare witnessed population decline and most notable of these has been the decrease in Newbridge Urban by -2.6% (or -206 people), which is in sharp contrast to the high growth in the town's environs. As represented on

the map in the Figure above, highest increases have all been in the environs of urban areas and in general the central and northeast of the county, with the majority of this growth taking place between 2000 and 2011, influenced primarily by growth designations under the 1999 Strategic Planning Guidelines for the Greater Dublin Area, extensive residential zoning of land and Celtic tiger era construction levels. Increases in excess of 45% were recorded in the ED's of Newbridge Rural (+46.3%), Donaghcumper (+46.5%), Kilcock (+47.5%), Athy Rural (+53.1%), Naas Rural (+59.3%), Rathangan (+68.5%) and Newtown (+95%).

Despite a declining population recorded for Eadestown, decreasing from 201 persons in 2011 to 194 persons in 2016 (-3.6% growth rate), the upward demographic trend of Naas and unlocking the development potential in Eadestown is suggested to assist in reversing the population decline in this settlement. This is also submitted to sustain Eadestown growth, supporting existing community infrastructure in the village.

7.2 Sustaining Development of Eadestown

As mentioned earlier, located to the south-east of Naas and north-west of Blessington, Eadestown is an established ribbon of family houses. However, it also enjoys a variety of community services including the Rathmore National School, the Funbugs Creche, and GAA club (Eadestown GFC) located to the south of the village. According to the website Schooldays.ie, the Rathmore National School recorded an overall total of 314 no. pupils for the academic year of 2021-2022, which showcases the notable scale of performance for this school.

In relation to the creche, the TUSLA databank shows that Funbugs creche catering for 1-6 years old age cohort on a full-day and part-time basis and had an enrollment of 85 no. children in 2020. Considering the limited number of dwellings currently in Eadestown, the notable level of activity in these early childcare and educational facilities renders an active community infrastructure in this village. It also indicates the nature of most daily travels taken to Eadestown from the adjacent settlements.

In addition, the Eadestown GAA club founded in 1884, has constantly grown, both in terms of number of members and the club itself. Eadestown GFC have a growing membership and field with both a senior men's and senior ladies' team. Underage teams are also provided for and since 2012, the club have fielded their own minor team. The club has been successful at all levels and indeed the Ladies team were All Ireland Junior Champions in 2006. This is evidence of the growing size of the club and community itself.

In 2005, upgrade works were carried out in the club, and this includes the installation of floodlights, nets behind goals, playing pitch drainage system and a path around the pitch. In 2006, wooden railings, a large advertising hoarding, a sign at the entrance and a digital scoreboard were added.

Therefore, Eadestown has a notable and expanding capacity in terms of community services in an under-represented residential context. This is suggested to adversely affect the performance of existing community services, where there is an unbalance distribution of residential and services.



Figure 10. The Playground at Eadestown for 1-12 years Age Cohort Opened in June 2019 (source: Kildare County Council)

With respect to the above, it is submitted that zoning of the lands subject to this submission would provide for the smart growth of this settlement by expanding the existing community, moving Eadestown up in the hierarchy of settlement and consolidate its future development.

7.3 Easing Growth Pressure on Naas

With a population of 21,393 people in 2016, Naas has been identified as a Key Town in County Kildare, accommodating 9.6% of the overall population residing in the County. According to Core Strategy of the draft County Development Plan, Naas is suggested to take in 14.9% of the housing and population target for Kildare over the lifetime of the Plan. This translates to delivery of 1,362 no. dwellings on 40ha residentially zoned lands over Q1 2023-Q4 2028. This is suggested to be regardless of unmet targets from the previous Plan period. Therefore, the strong demand for housing in Naas is expected to grow steadily over the forthcoming Plan period. In terms of housing mix, the average household size in Naas (CSO settlement boundary) comprises of 2.76 persons per household, which is similar to the national average of 2.75. The Kildare County Development Plan 2017-2023 (as varied) uses an occupancy rate figure of 2.8 persons as this is the figure for the county as reported by Census 2016.

In 2016, 41.4% of households in Naas comprised couples with children. This is higher than the proportion across the State of 35.2% for this household composition category. In contrast the household composition of one person households in Naas is 17.8% which is significantly less than that of the State at 23.5% for this household category. Thus, there is a greater demand for family houses and relevant community services, in the likes of early childcare and educational schools, etc.

As outlined earlier in the planning policy section, considering the location of subject lands in Eadestown which provides for a suitable distance from Naas, it is suggested that zoning of the lands would allow for housing delivery in an area with existing strong demand. The type of housing is expected to be large family dwellings, which essentially supports provision for a mix of housing by freeing up zoned lands in Naas to supply for smaller households. Thus, the submission is consistent with the Naas Local Area Plan.

7.4 Pandemic-driven Rural Renaissance

The outbreak of Covid-19 pandemic and significant impacts of lockdown on building up new habits is suggested to effectively change spatial planning as well. More households seem to migrate out of cities and to the countryside, considering the remote working becoming an alternative. This rural renaissance is suggested to be an amenity-driven in-migration flow, which can be facilitated in the serviced rural, providing for a more balanced and sustainable distribution of population across the State. In light of this, this proposal is submitted to be in line with the recent demographic movements considering the fact that Eadestown has an existing capacity to support community services.

7.5 Provision of Sustainable Development with Planning & Community Gain

The proposed zoning and future development of these lands will also incorporate significant areas of public open space giving rise to increased community facilities, a south-north link road, as well as housing. The public open space creates the opportunity to provide significant community gain in the form of new playing pitches, parks, sensory gardens, walkways, biodiversity planting, designated cycle café, etc. and this is suggested to be provisioned in the northern portion of the lands as to create a synergetic relationship with the existing primary school and creche. In the medium-long term there would be the potential for the national school to expand into this area if the need demanded it. In this regard, the northern end of the site is identified for community infrastructure and recreation use as opposed to residential housing.

The north-south link road would also facilitate connection from Blessington throughout the site and all the way to the northern boundary of the land and to the school. This will provide significant improvement in terms of traffic safety and accessibility by reducing traffic movements at the existing T-junction and improve connectivity to the school.

It is noted that the L2021 road, which runs in front of Rathmore National School and the childcare centre and community centre, is very narrow and it is difficult for cars to pass without having to make dangerous maneuvers. However, the potential new link road that the development of these lands would provide for will effectively eliminate this hazard by providing for a safer means of access to the school and adjoining facilities.

The proposer would be happy to work with the Planning Authority and local community in the provision of specific facilities at the appropriate time.

Furthermore, the zoning of these lands to facilitate housing within the core of Eadestown can facilitate the future growth of the village, commensurate with the provision of new infrastructure, which the lands can deliver. This will ensure that Eadestown develops and strengthens in a plan-led manner and will provide a viable alternative to one-off housing in the open countryside.

7.6 Precedent in the draft County Development Plan

Outlined in the draft County Development Plan, *“a number of amendments were made to the Settlement Hierarchy arising from this process. Narraghmore (previously a rural settlement) was moved up the hierarchy and is now designated as a village. Clogherinkoe and Kilkea (both previously rural nodes) were moved up the hierarchy to become rural settlements while Maddenstown moved down the hierarchy to become a rural node.”*

With a population of 392 people in 2016, Kilkea is a village in south County Kildare, located c. 9km from the town of Athy via R418 Regional Road. According to the Census, the village experienced a population growth of 1% (+4 persons) over the intercensal period. In terms of community amenities, the Kilkea National School, Kilkea Church of Ireland, and Kilkea Castle Hotel and Golf resort are located within this settlement. It is worth mentioning that Kilkea National School recorded an overall total of 57 no. enrolments in the academic year of 2021-2022.

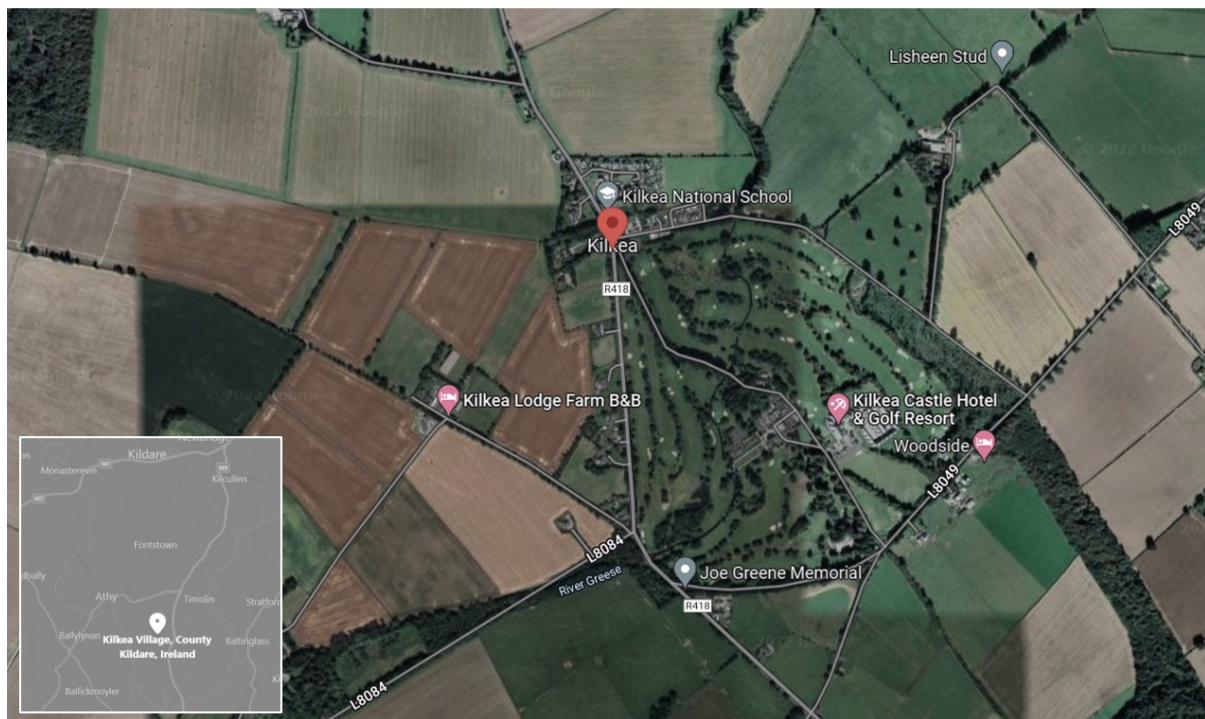


Figure 11. An Aerial Map of Kilkea illustrating Scale of the Village and Existing Community Services

With a population of 246 people in 2016, Clogherinka is a village in north County Kildare, located c. 8.2km to the west of Cadamstown via Kilglass and c. 11.2km to the north of Derrinturn via Calfstown. According to the Census, the village experienced a population growth of 3.7% (+9 persons) over the intercensal period. In terms of community amenities, the Clogherinka National School and Community Library and St. Brigid’s Church are located within the village. In addition, Clogherinka GAA club is located c. 2km to the south-east of this settlement. It is noted that Clogherinka National School recorded an overall total of 142 no. enrolments in the academic year of 2021-2022.

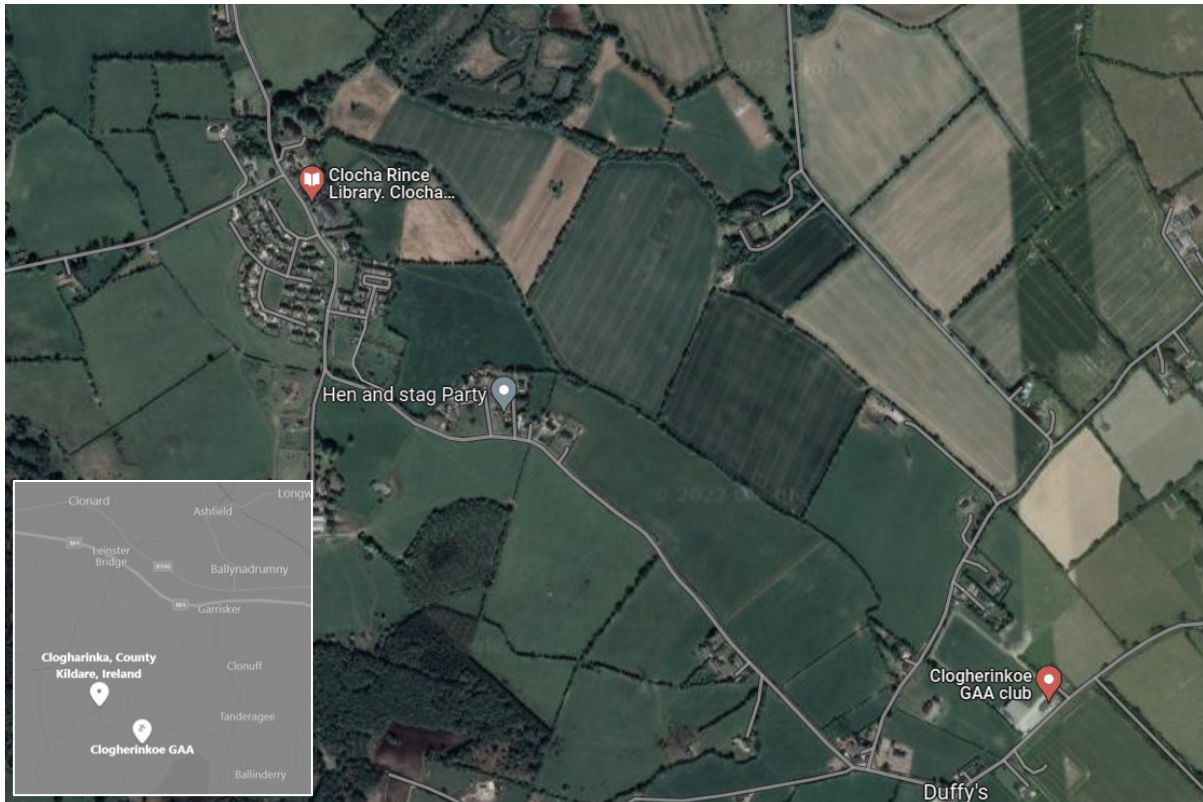


Figure 12. An Aerial Map of Clogherinkoe illustrating Scale of the Village and Existing Community Services

With respect to the above, the two settlements of Clogherinkoe and Kilkea have been moved up in the settlement hierarchy of the draft County Development Plan. Comparing the existing context to these settlements, which is very similar to the case of Eadestown, is suggested to provide grounds for promoting Eadestown to a village by providing for a more balanced community. Both settlements have a limited number of dwellings supported by a number of community services, in the likes of a school, library, sport club, etc. This is suggested to have stronger grounds in the instance of Eadestown, as this settlement is located in a more convenient distance from higher-tiered settlements of Naas and Blessington, which provides for less and/or shorter car-driven travels. It is also noted that this is to be further reinforced by provision for cycling infrastructure.

In addition, Eadestown provides for a wider array of community services, including a primary school, a creche, and a GAA club. Also, the school is submitted to have a considerably greater number of enrolments when compared to both Clogherinkoe and Kilkea schools, i.e., an overall total of 314 no. pupils for the academic year of 2021-2022 which is more than two times the size of the enrolments in Clogherinkoe National School and more than 5 times the size of enrolments in Kilkea National School. This is further supported by the creche which as mentioned earlier recorded an enrolment figure of 85 no. children.

With respect to the above, Downey are of the professional opinion that Eadestown has the capacity in terms of community infrastructure to support an increased quantum of residentially zoned lands which would sustainably assist in moving up this settlement in the Settlement Hierarchy of the County by consolidating the future growth.

8.0 CONCLUSION

Downey, Chartered Town Planners, 29 Merrion Square, D02 RW64, have prepared this submission to the Draft Kildare County Council Development Plan 2023-2029. This submission is made on behalf of our client, Mintmac Properties Limited, in relation to the zoning objectives of the lands located off the Blessington Road (R410), Eadestown, County Kildare.

In keeping with the current Development Plan, the land has been proposed to be zoned as “New Residential”, in order to correspond to the growing population, existing level of community services, and sustaining future growth of Eadestown.

Section 5 of this submission outlines consistency of this proposal within national, regional, and local planning policy and how it would contribute to sustainable planning and development of Eadestown and in particular would provide for the housing targets of the town. This is also submitted to keep with the draft County Development Plan and its proposed objectives and policies for future rural housing policy. Further details in this regard can be found in Section 6 of the submission. Section 7 of this submission further supports this proposal by providing grounds and justifications, which are summarised as follows:

- Demographic profile of County Kildare illustrating an ever-growing population since 1991 with a steady demand for housing, a legacy of un-activated planning permissions and unmet demand from the previous Plan period.
- Locational attributes of the lands, firstly rendered as “Areas Under Strong Urban Influence” under the draft County Development Plan which essentially shows a growing demand, second convenience distance from both Naas and Blessington which makes the site a prime location for housing delivery.
- Existing capacity in terms of community services in the likes of a primary school, a creche, and a GAA club all having a remarkable catchment, which provides for ascending Eadestown in the settlement hierarchy of the County if a balanced development for the village is targeted.
- The emerging patterns of development as a result of Covid-19 pandemic outbreak which appears as amenity-driven in-migrated flows of population providing for a rural renaissance.
- The zoning of the lands for housing and development can bring about significant community gain in the form of new infrastructure, community and playing pitches as well as large areas of public open space.
- It will create a plan-led, sustainable alternative to one-off rural housing in the open countryside.
- The instances of Clogherinkoe and Kilkea, which were both rural nodes, and with very similar conditions to the case of Eadestown have moved up in the Hierarchy Settlement of the County as proposed in the draft County Development Plan.

With regards to the above, Downey are of the professional opinion that the proposed zoning of the lands to “New Residential” would expedite delivery of an appropriate quantum of residential development in a prime location. Also, it provides for smart growth of Eadestown in the future by moving up this settlement in the Settlement Hierarchy.

In light of the above, Downey respectfully request that Kildare County Council consider the grounds and justifications of this submission into consideration when preparing the draft Kildare County Development Plan 2023-2029.



Figure 13. Indicative Sketch Layout of the Subject Lands