

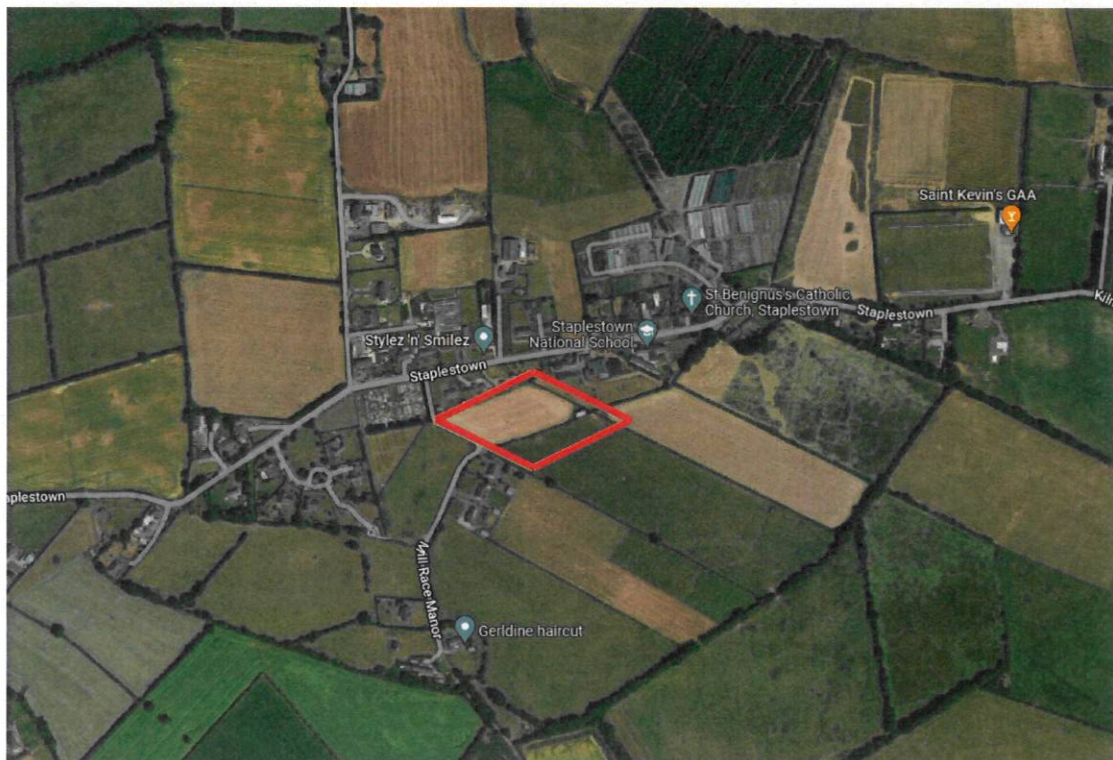


bca

brian connolly associates
CONSULTING ENGINEERS

Brian Connolly
Chartered Engineer
BSc (Eng) MSc DIC C.Eng MIEI

The Studio, Woods Way, Clane, Co. Kildare



**Application on behalf of John Noone
to have his land in Staplestown
included in the settlement boundary and designated for the
Serviced Sites Initiative/Settlement Expansion when the
Kildare County Development Plan (KCDP) 2023-2029 is
finalised in the coming months**

Introduction:

This submission has been prepared in response to the draft Kildare County Development Plan 2023-2029 published on 14/03/2022. In particular, the proposals for settlement expansion and the introduction of a new land use designation of 'Serviced Sites' in villages and rural settlements. It is noted that none of the undeveloped land in and adjacent to the Staplestown rural settlement have either of these designations in the draft KCDP

We have been requested by our client John Noone to make this submission for his lands in Staplestown (see attached map Figure 2), which are at the core of the settlement:

- (a) To be included in the settlement boundary
- (b) to be to be considered for either the new 'Serviced Sites' land use or Settlement Expansion when the Kildare County Development Plan 2023-2029 is finalised and adopted in the coming months.

The purpose of this submission is to facilitate members of his own family, who meet the criteria set out in policy HO 054 in the draft Kildare County Development Plan 2023-2029, to meet their own housing needs in a village environment.

This submission proposes to identify a realistic 'Service Sites' strategy that meets the aspirations and needs of those who wish to provide their own housing in a rural type setting in a sustainable manner and minimise the impact on the rural countryside.

Background:

There are a number of statutory documents that set out the national, regional rural housing policy that informed the rural housing policy and specifically the Serviced Sites initiative in the draft Kildare County Development Plan 2023-2029.

'Project Ireland 2040 National Planning Framework'

Chapter 5.2 of 'Project Ireland 2040 National Planning Framework' states that a tailored approach is required to residential

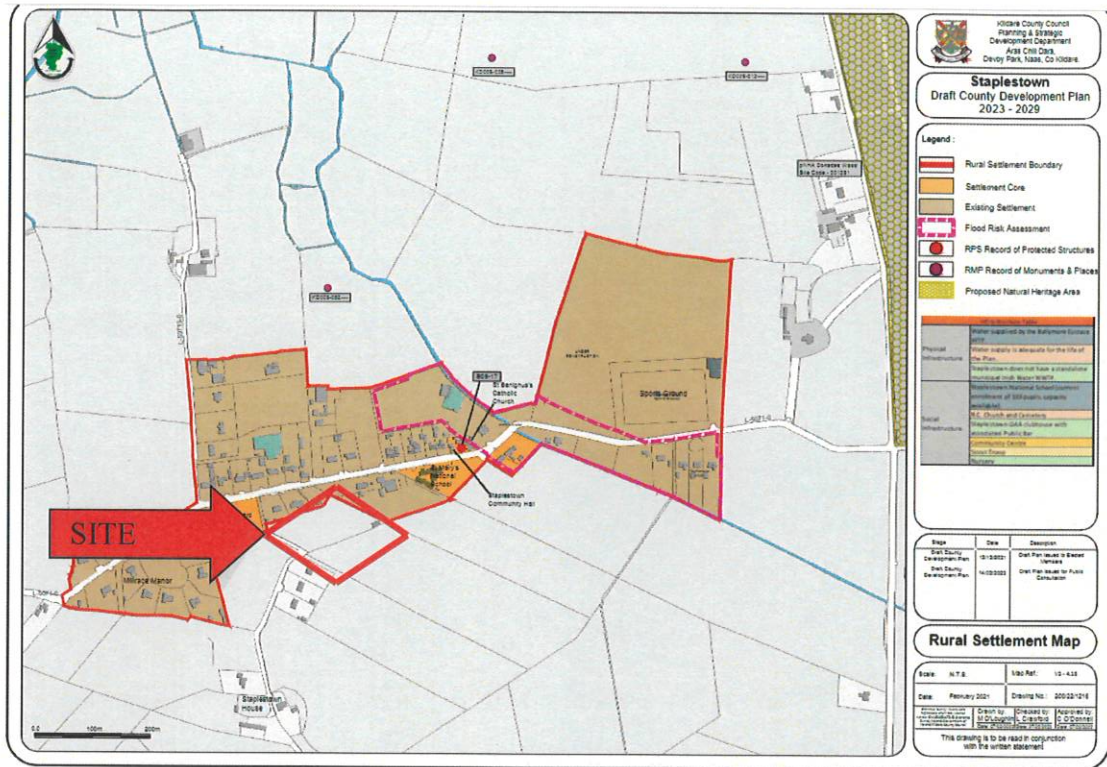


Figure 1. Map V2.4.18; Map for Draft County Development Plan 2023-2029

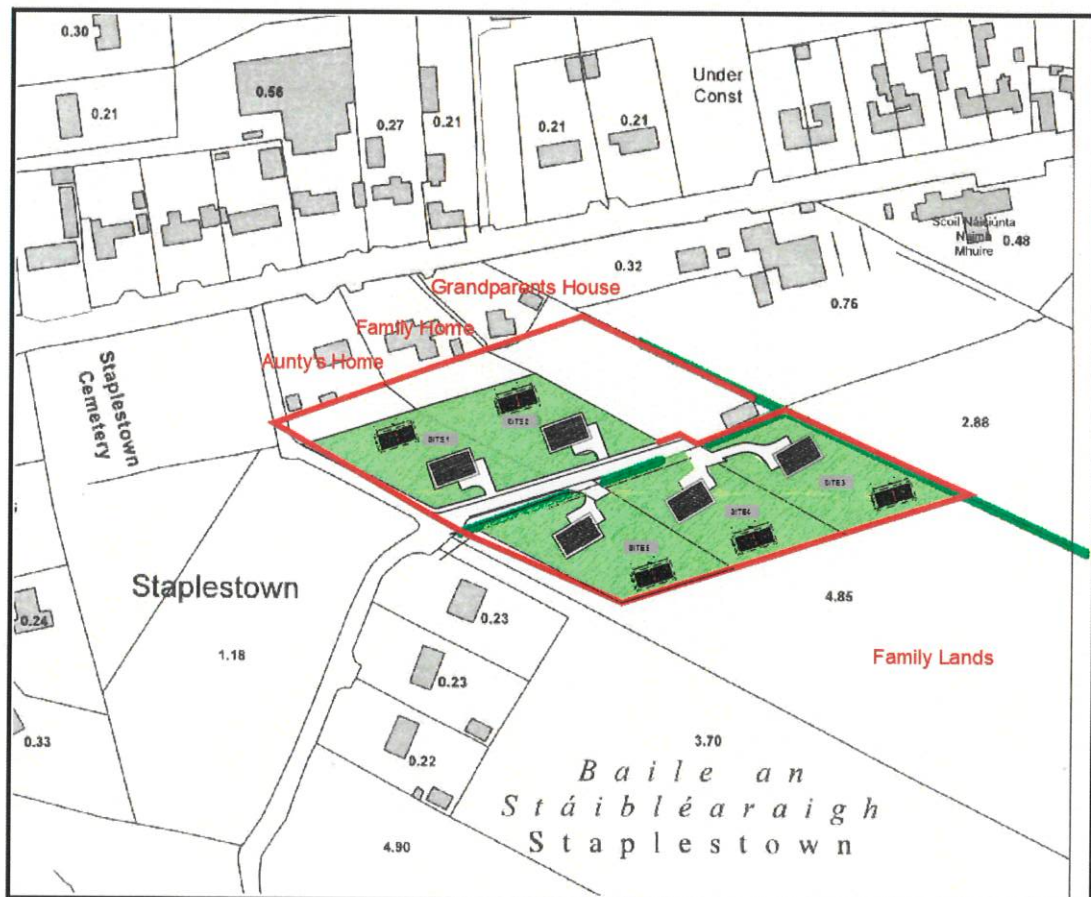


Figure 2. 2.0 Hectares of lands submitted for inclusion outlined in red

developments in rural towns to ensure that a suburban or high density urban approach is not applied to a rural setting and that development responds to the character, scale and density of the town.

National Objective Policy 18b states the need 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'*

National Objective Policy 19 limits the provision of single housing to those who have an intrinsic need to work and live in the countryside having regard to the viability of small towns and rural settlements. (This Objective has been cited by An Bord Pleannala in a recent decision (PL09. 308402, KCC 20/569) as putting further restriction on those who are eligible to provide their own housing in the rural countryside than that envisaged in the Kildare County Development Plan 2017-2023)

The Eastern and Midland Assembly Regional, Spatial and Economic Strategy' 2019-2031

Chapter 4.8 of 'The Eastern and Midland Assembly Regional, Spatial and Economic Strategy' 2019-2031 sets out the policies and objectives for Rural Places: Towns, Villages and the Countryside. It states that *'Support for housing and population growth within rural towns and villages will help to act as a viable alternative to rural one-off housing.'*

Proposals to support population growth in villages and rural settlements by the provision of 'Serviced Sites' designation contained in the draft KCC CDP 2023-2029:

The proposals for village/rural settlement expansion and the 'Serviced Sites' initiative are set out in volumes 1 and 2 of the draft KCC CDP 2023-2029.

Section 3.13.7 provides for alternatives to one off rural housing. It acknowledges the strong connection of people in Ireland with rural areas for several reasons.

It recognizes that an important challenge for national and local policy makers is maintaining the viability of villages, which is critical for rural Ireland.

It further states that a priority of the plan is to provide a model for serviced sites in established communities as a sustainable alternative to one of rural housing in the open countryside.

The draft plan proposes to establish a 'County Kildare Serviced Sites Initiative' that will attract new residents to live in villages and rural settlements and thus sustain the communities and economies of these areas.

This section contains a number of policy statements and proposed actions.

Policies:

HO P22: Promote and facilitate the provision of sustainable alternatives to one off housing by designation of lands for serviced sites in villages and rural settlements.

HO P23: No development to take place on serviced sites until the KCC 'Serviced Sites Initiative Scheme' has been agreed (adopted) by the elected members.

HO O54: Applicants for dwelling units in these serviced sites must comply with local needs criteria set out in Table 3.4 of the draft CDP

HO O55: The 'Serviced Sites' should provide for small scale housing with densities of no more than 10 units/Hectare.

Actions:

HO A8: To prepare a KCC 'Serviced Sites Scheme Policy Document' within six months of the adoption of the KCC CDP 2023-2029.

Residential Densities for villages & rural settlements and extent of proposed service sites:

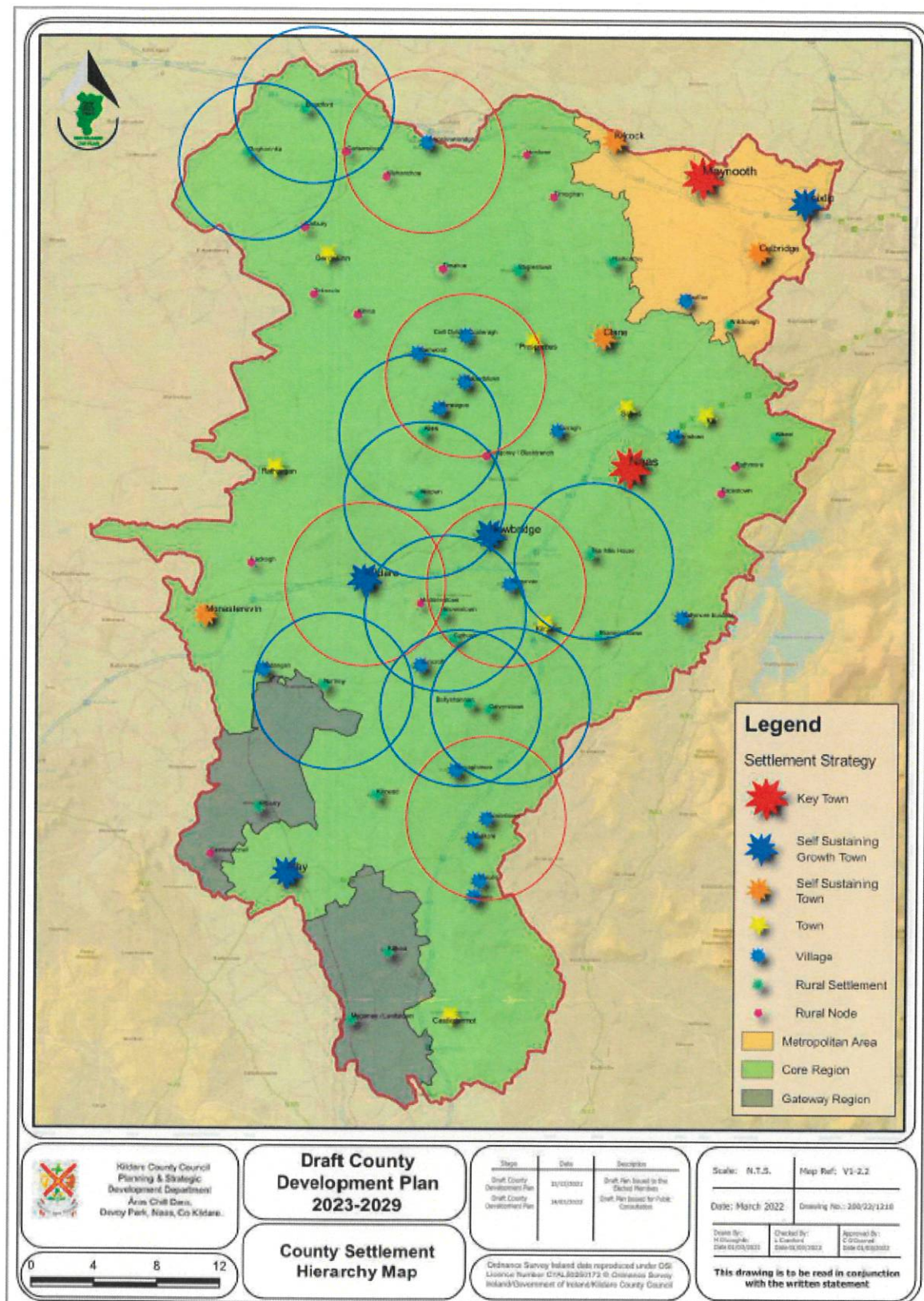


Figure 3. Map V1-2.2 with serviced sites initiative shown

Table 3.1 of Volume 1 sets out the general densities for the various settlement types. The densities for villages are 15-20 units/Hectare and for rural settlement expansions they are 15 units/Hectare.

Table 3.1 of Volume 2 sets out the 17 villages and 19 rural settlements in the settlement hierarchy.

Table 3.3 of Volume 2 identifies only 5 of the 17 villages that will benefit from the 'Serviced Sites' designation. In total 10 Hectares are designated.

There does not appear to be a similar table for the rural settlements. An audit of the development strategies for the 19 rural settlements indicate that only 9 of the 19 rural settlements have 'Serviced Sites' designation. In total 14 Hectares are designated.

In all, it is proposed to provide 24 Hectares for the 'Serviced Sites Initiative'. The maximum density for these lands are 10/Hectare (HO O55). This will provide for 240 units county wide over the period of the plan. This averages at 40 units/annum.

It should be noted that in 2021, 161 applications for one off rural houses were refused in Kildare and in the period January- April 2022 a further 39 applications have been refused.

Land Designation in Staplestown in Previous County Development Plans

The 2005-2011 CDP introduced the concept of Policy Theme Boundaries for the rural settlements in the county. The lands that are the subject of this submission were within the Staplestown rural settlement boundary in that plan, see Figure 4 below. The extent of the settlement boundary was significantly reduced in subsequent Plans.

In both the 2011-2017 and the 2017-2023 CDP, the extent of the settlement was significantly reduced. As a result, this site, which is located at the core of the settlement, was excluded from the settlement boundary while lands further from the core were retained within the boundary and were designated for 'settlement expansion'

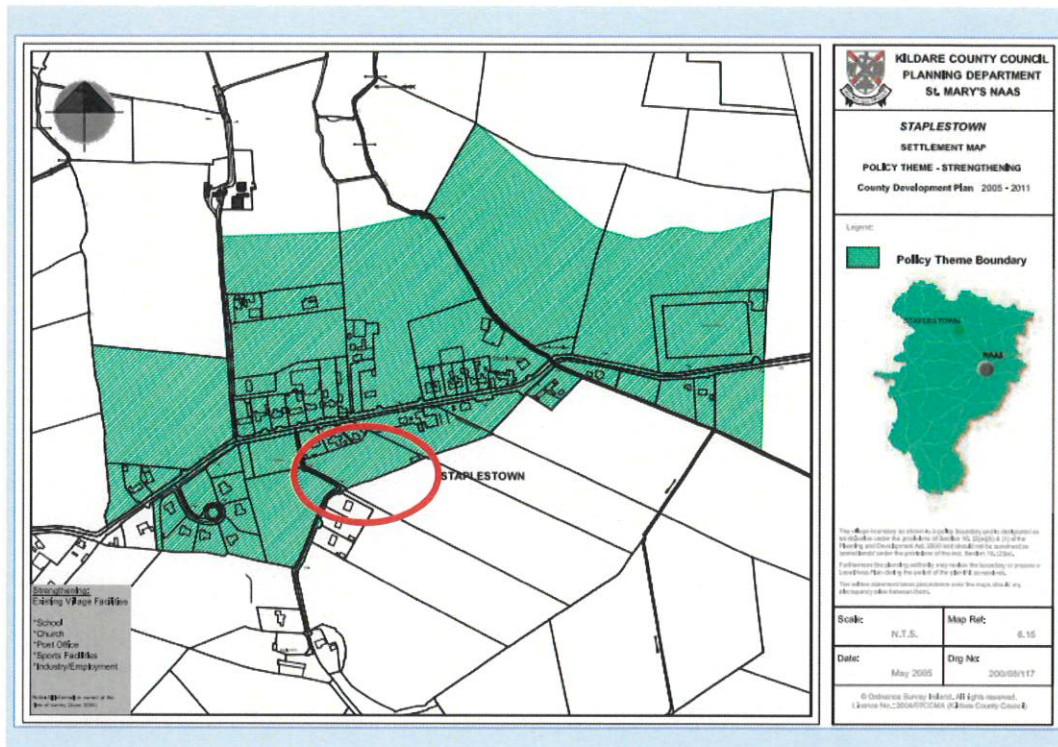


Figure 4. Map 6.15; Map from County Development Plan 2005-2011

Proposed settlement boundary expansion and 'Serviced Sites Designation' in Staplestown Co. Kildare

The introduction of the 'Serviced Sites' initiative in the draft KCC CDP 2023-2029 is welcomed. The objectives and policy statements contained in the national, regional and local development strategies, detailed above, is to direct the demand for one off rural housing into the villages and rural settlements identified in the settlement hierarchy as a viable alternative to rural one-off housing.

However, if the 'Serviced Sites' Initiative is to be a realistic viable alternative, the KCC CDP 2023-2029 will need to provide a sufficient quantum of serviced sites to meet the needs of those who wish to build their own house in a rural environment.

None of the undeveloped land in and adjacent to the Staplestown rural settlement have either settlement expansion or serviced sites designation in the draft KCDP

The draft CDP only provides for 'serviced sites' designation in 5 of the 17 villages and 9 of the 19 rural settlements. The total area of land to which this designation applies is 24 Hectares with a max. density of 10/Hectare. Even if all this land was developed to its full potential in the life of the CDP (which is highly unlikely), it would only facilitate the provision of 240 residential units, an average of 40/annum. Given that there have been 161 refusals for one off rural houses in Kildare in 2021 and a further 39 in the first four months of 2022, the number of units that are proposed in the draft CDP 2023-2029 goes nowhere near meeting the demand and need for this type of housing in Kildare. Additional serviced sites will be required if the initiative is to be successful in achieving its stated objectives.

The only way this can be achieved is by increasing the number of villages and rural settlements with 'Serviced Sites' designation, extending the boundaries of the villages and settlements and increasing the quantum of appropriately designated land in the enlarged villages and settlements

The proposed inclusion of Mr. Noone's land within the village boundary and to designate his land for 'Serviced Sites' status would facilitate members of his own family, who meet the criteria set out in policy HO 054 in the draft Kildare County Development Plan 2023-2029, to meet their own housing needs in a village environment.

Our client's land is adjacent to the current Staplestown settlement boundary as set out on attached map. It is suitable and appropriate for boundary expansion and serviced sites designation of the following reasons:

The lands that are the subject of this submission are located adjacent to the current settlement boundary, access to the lands is within in the settlement boundary and within the 50kph speed limit. The lands benefit from mains water and the land has the capacity to accommodate individual wastewater treatment plants. The settlement boundary should be amended to include these lands

The development of these lands will be the sequential development of the lands that are adjacent. The lands to the north and east of the site are in existing established residential use and the lands to the west of the site are currently under construction for new residential use (planning ref. 20/285) The development of our client's site would be 'in- fill' development and will not be a case of 'leap frogging' undeveloped land.

HO P23 states that no development will be considered on serviced sites until the KCC 'Serviced Sites Initiative Scheme' has been agreed (adopted) by the elected members. It could be argued that identifying specific sites for this designation in advance of the Scheme being prepared is premature

Summary:

The introduction of the 'Serviced Sites' Initiative detailed in the draft KCC CDP 2023-2029 is to be welcomed. However, if it is to be a successful alternative to one off rural housing, the quantum of land designated for this initiative (24 Hectares) is clearly insufficient in light of the number of unsuccessful planning applications for one off rural houses in Kildare in recent years. The fact that only 5 of the 17 villages and 9 of the 19 the rural settlements have lands with this designation.

The draft CDP does not include any land in Staplestown for 'Serviced Sites' Initiative.

The proposed expansion of the village boundary to include Mr. Noone's land and to designate his land for 'Serviced Sites' status would facilitate members of his own family, who meet the criteria set out in policy HO 054, to meet their own housing needs in a village environment.

As stated above the development of our client's land in the core of the Staplestown rural settlement would represent the sequential

development of the settlement as they are adjacent to lands currently in residential use. It is suitable and appropriate for boundary expansion and serviced sites designation

This submission is intended to offer a realistic alternative to those who do not qualify under the current Rural Housing Policy yet aspire to live in a rural type development.