



23rd May, 2022

Submission to the Draft Kildare County Development plan 2023 – 2029
in respect of a request to rezone lands at Coolearagh, Coill Dubh,
County Kildare (Draft CDP reference V2 3.7.1)

Submitted for the attention of the Senior Planner, Forward Planning, Planning Department, Kildare County Council (delivered in person, by hand, to Kildare County Council headquarters, Naas, County Kildare on Monday, 23rd May 2022.)

A Chairde,

I set out herein a request to have lands, in my family ownership, zoned at Coolearagh, Coill Dubh, Naas, County Kildare for residential use in the Kildare County Development plan 2023 – 2029. The submission is made in response to the public consultation on the draft Kildare County Development plan 2023 – 2029 (closing on Tuesday, 24th May 2022).

The submission hereunder outlines my case.

SITE LOCATION & CONTEXT

Site Location & Description

The subject lands with an area of approximately 4.45 Hectares (11 acres), are located in Coolearagh in close proximity to Coill Dubh within the Coill Dubh / Coolearagh village settlement as described at V2 3.7.1 of the Draft Kildare County Development Plan 2023 – 2029. The said lands are marked on the map attached hereunder. The site is owned by me (and my family), Carmel Kenny, having been acquired by late husband, who died suddenly in August 2021. It remains my desire (and that of my late husband and family) that housing for my children will be accommodated on the lands as part of appropriate zoning of scale on the lands in keeping with the principles of compact growth and sustainable development in tandem with the improvement of facilities and amenities within Coill Dubh and Coolearagh. Coill Dubh and Coolearagh are approximately 600 meters apart. The site that is proposed for residential zoning is approximately 250 meters from the geographic centre point of Coolearagh. The proposed site is approximately 400 meters from the current Coill Dubh development envelope boundary and it is 500 meters from Coill Dubh Hurling Club. The site is 90 meters in Cois Na Mōna housing scheme in Coolearagh.



Site Context

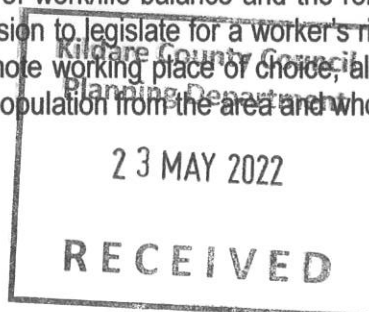
The subject site is within the village settlement, immediately adjacent to exiting residential development, is serviced by public water and wastewater facilities and it is adjacent to all services within the village settlement, including the school, church, sporting and community facilities, local retail. The village contains various service businesses, including a post office, credit union, hairdresser, warehouse/workshop. The site is within the designated 50kph speed limit for the village and there are safe pedestrian facilities throughout the village. The village enjoys bus transport linkages to Naas, Prosperous, Clane, Maynooth (National University of Ireland (NUIM)), Derrinturn, Carbury and Newbridge.

Consideration is being given by Kildare County Council to examining the feasibility of designating an architectural conservation zone within Coill Dubh. The draft county development plan seeks to protect existing retail and commercial functions within the village settlement of Coolearagh and Coill Dubh

Facilities and Services

The subject lands are located in close proximity to a wide range of amenities, services and community facilities both within the village and in its hinterland, including sporting (both immediately adjacent and in Mondello Park, childcare, education (primary) and both additional primary secondary schools within the immediate hinterland, local retail, workspace. KCC is also investigating the provision of additional community facilities, specifically a playground and a local park facility, in Coill Dubh / Coolearagh. It is also an objective of KCC to seek the regeneration of the former Board Na Mona works in the village, the rejuvenation of which will also facilitate the development of a remote working hub.

The ongoing Covid-19 pandemic has highlighted the importance of work/life balance and the role that remote working can play in society. The upcoming statutory provision to legislate for a worker's right to apply for remote working will add benefit to Coolearagh as a remote working place of choice, aligning and strengthening the village as a location of choice for the local population from the area and who wish



to continue to reside and work in the locality. The area is serviced by excellent broadband, which will be enhanced further through the national broadband project.

Connectivity

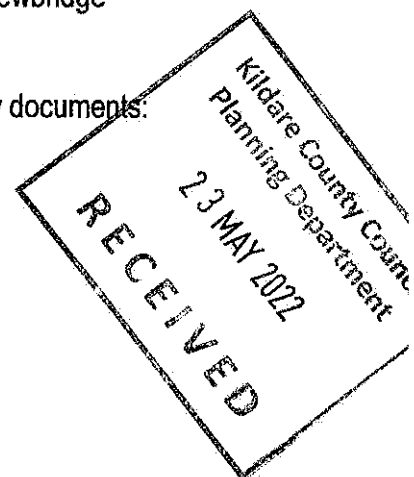
Coill Dubh and Coolearagh are accessed from the Carbury/Derrinturn Road, the R403, which links to Prosperous, Clane, and Maynooth and Celbridge. From the junction of the R403 with the R409, it is approximately 1.2km from Dagwelds Bar and Lounge to Coill Dubh and 1.8km to Coolearagh. Also from the R403 junction with the R409, it is 2.5km to Prosperous and 5 km to Clane. The same junction is 4km from Allenwood,

As outlined, the village settlement enjoys excellent connectivity by public transport to Naas, Prosperous, Clane, Maynooth (National University of Ireland (NUIM)), Derrinturn, Carbury and Newbridge

PLANNING POLICY CONTEXT

This submission has been prepared with cognisance to the following planning policy documents:

- National Planning Framework: Project Ireland 2040
- Regional Spatial & Economic Strategy for the
- Midlands East Regional Assembly 2032
- Kildare County Development Plan 2017 - 2023 &
- Draft Kildare County Development Plan 2023 - 2029



National Planning Framework

Project Ireland 2040

In 2018, the Government of Ireland adopted the National Planning Framework (NPF) entitled Ireland 2040 to succeed the National Spatial Strategy. The NPF comprises the Government's proposed long-term strategic planning framework to guide national, regional and local planning and investment decisions up to the year 2040. It is intended that the NPF will be a strategic document that will provide the framework for future development and investment in Ireland, providing a long-term and place-based aspect to public policy and investment and, aiming to coordinate sectoral areas such as housing, jobs, transport, education, health, environment, energy and communications, into an overall coherent strategy.

The NPF has a number of National Policy Objectives (NPOs) that articulate delivering on a compact urban growth programme and are relevant to the proposed rezoning of the subject lands.

- NPO 1b relating to population growth in the region, with 340,000 to 380,000 additional people to 2040
- NPO 3a deliver at least 40% of all new homes within the built-up footprint of existing settlements
- NPO 4 relating to attractive, well-designed liveable neighbourhoods;
- NPO 5 relating to sufficient scale and quality of urban development; and
- NPO 6 relating to increased residential population and employment in urban areas.
- NPO 33 prioritise provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.

It should also be noted that a report published by the National Investment Office of the Department of Public Expenditure and Reform 'Assessing the alignment of the National Planning Framework and National Development Plan' has carried out a high-level assessment of the population projections and housing needs as outlined in the NPF. The *Rebuilding Ireland* action plan set a target to reach a delivery of 25,000 homes per year in Ireland, which has further increased under 'Housing for All'. With the impact

of Covid-19 on these targets, a revised estimate for housing was developed in December 2020, which stated that the average housing supply will need to increase to an annual average of 33,000. This should also be reflected in the zoning of and to cater for growth and population increase.

Regional Spatial and Economic Strategy - Eastern and Midlands Regional Assembly (2020- 2032)

The Regional Spatial & Economic Strategy for the Eastern and Midlands Regional Assembly (2020-2032) was adopted with principal purpose of the RSES being to support the implementation of the National Planning Framework and the economic policies and objectives of the Government by providing a long-term strategic planning and economic framework for the development of the regions.

It is my analysis that the subject site should be zoned to Residential based on the following considerations:

The subject site is located immediately adjacent and abutting the existing built-up area including existing residential development. Therefore, the pattern of exiting residential development is well now established in both Coolearagh and Coill Dubh. These lands present an opportunity to extend the already established pattern of appropriate density residential development on serviced land.

The subject site is located within a strategic location in the built-up area of the Coolearagh / Coill Dubh village settlement, abutting Coolearagh in very close proximity to Coill Dubh. The subject site extends to an area of 4.45 hectares and has the capacity to assist Kildare County Council in meeting the housing requirements for County Kildare as outlined in the core strategy. The subject site is very well served by existing infrastructure in the surrounding area including roads, pedestrian links, and water infrastructure. The proposal for appropriate density residential zoning at the subject site will assist Kildare County Council in achieving the housing targets as outlined in the core strategy and 'Housing for All'. It will contribute to the achievement of a mix of house types within the area, including affordable, cost rental, acquisition, social, part 5, age friendly, life time adaptable etc.

There are no apparent planning constraints associated with the subject site:

- There are no ecological designations directly on the site, no cultural or archaeological sites, no flood zones or recorded flood events, and no concerns with access.
- Medium density residential development would be meeting both National and Regional policy objectives and population growth targets.

It is the request of this submission that Kildare County Council recognises the potential of these lands and the opportunity for growth in this area that can be provided.

Assessment

The purpose of this section is to provide an assessment of the subject site against the criteria utilised by Planning Authorities in the identification of appropriate land for new residential development and as set out in Section 4 of the Development Plans: Guidelines for Planning Authorities 2007 published by the Department of Housing, Local Government and Heritage. The key criteria from this document will be set out below and an assessment of the proposed development provided against same. These criteria are as follows:

- Need
- Policy Context

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- Capacity of Water, Drainage and Roads Infrastructure
- Supporting Infrastructure & Facilities
- Physical Suitability
- Sequential Approach
- Environmental and Heritage Policy
- This assessment also notes the criteria set out in section 6.2 of the Draft Development Plan Guidelines for Planning Authorities 2021, published by the Department of Housing, Local Government and Heritage.

Need

Section 4.13 of the Development Plans: Guidelines for Planning Authorities 2007 published by the Department of Housing, Local Government and Heritage states in relation to need that "The amount of and to be zoned for any particular land-use must be clearly based on, and justified by, a realistic assessment of need. The survey and analysis stage of plan preparation should provide the base-line data to determine future land requirements. A number of factors need to be taken into consideration when determining the location and quantity of land to be zoned".

As outlined in the core strategy of the Draft Plan, it is projected that Kildare will 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. It is considered that there is an obvious and identifiable need for lands to be zoned for residential development at appropriate locations such as the subject site.

Policy Context

The Guidelines state the following in respect of Policy Context:

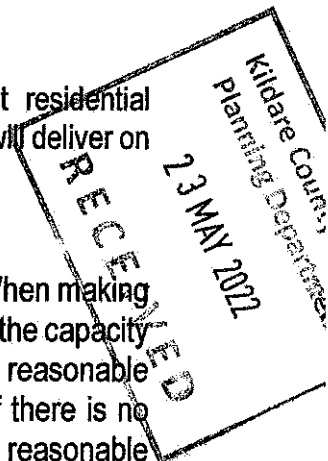
"Both the amount of land to be zoned for development and the proposed location of that land will also need to be influenced by other plans and strategies, from national and regional to local levels so that local authorities play their full part in supporting the implementation of those national and regional strategies."

My analysis of the relevant national, regional and local policy framework is that residential development would be meeting the relevant policy objectives and the proposed zoning will deliver on the objectives of the draft development plan.

Capacity of Water, Drainage and Roads Infrastructure

The Guidelines state the following in respect of Supporting Infrastructure & Facilities: "When making decisions to zone land, regard must be had to the existing and future availability of, or the capacity to provide, infrastructure. Where services are not available there should be a reasonable expectation of their being provided in the plan period. Land should not be zoned if there is no reliable prospect of providing key physical infrastructure, within the plan period or a reasonable time period thereafter, such as improved roads, footpaths, drainage and lighting to serve likely future development."

The subject site is served by existing roads and pedestrian routes. There are good and very adequate footpaths in the area. The proposed site can be easily linked into the Coolearagh settlement given its location beside the village. There are existing public water services in the area, with available



capacity. Any future development on the subject site will include a pre-connection enquiry to Irish Water for a connection to the existing public network.

Supporting Infrastructure and Facilities

The Guidelines state the following in respect of Supporting Infrastructure & Facilities: "Consideration must be given to the future availability of, or the capacity to provide, supporting infrastructure, such as community facilities, schools, public open space, retail and other service provision and public transport when allocating land for development."

There are a variety of community facilities and amenity facilities located in close proximity to the subject site. These include services such as education, retail, and recreational facilities.

Physical Suitability

The Guidelines state the following in respect of Physical Suitability:

"The development plan should strive to ensure that the form and location of new development offers the best "value for money" in terms of efficient use of existing infrastructure, while minimising the need for costly new infrastructure. Where land in green-field locations is to be zoned, account should be taken, in considering the different options available, of the land's capacity for development by way of the most cost-effective means of providing the necessary infrastructure."

There is a range of existing infrastructure located in the area surrounding the site. There are existing footpaths and pedestrian linkages located in the area with existing access points which connect with the site. There are no apparent planning constraints associated with the subject site; there are no ecological designations directly on the site, no cultural or archaeological sites, no flood zones or recorded flood events, and no concerns with access.

Sequential Approach

The Development Plans: Guidelines for Planning Authorities 2007 state the following in respect of the Sequential Approach:

"In order to maximise the utility of existing and future infrastructure provision and promote the achievement of sustainability, a logical sequential approach should be taken to the zoning of land for development:

- (i) Zoning should extend outwards from the centre of an urban area, with undeveloped lands closest to the core and public transport routes being given preference (i.e. 'leapfrogging' to more remote areas should be avoided);
- (ii) A strong emphasis should be placed on encouraging infill opportunities and better use of under-utilised lands;
- (iii) Areas to be zoned should be contiguous to existing zoned development lands."
- (iv) The subject site is located in a strategic location within 90m of Collearagh centre and within 650m of Coill Dubh.
- (v) The site is located in an area characterised by compact residential development and acceptable density.
- (vi) The site is located adjacent to low density residential new development, which is under construction.

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- (vii) Any future residential development will be sympathetic towards the surrounding area and it constitutes proper planning and sustainable development. It will provide necessary mixed tenure development to address housing local needs and the objectives of *Housing for All*.
- (viii) The site is linked and capable of being linked to the adjoining settlement and to the wider area.

Natural Heritage

The Guidelines state the following in respect of Natural Heritage:

"Local authorities have a key role to play in regard to preserving the natural heritage of their areas arising from the legal responsibilities placed on them and from the increasing public awareness of the importance of nature conservation at local level. In doing so they should also avail of opportunities that may arise to create or promote new features of biodiversity in the context of new developments."

The subject site is not located within or adjacent to any ecologically designated sites. Any future development on the site will be subject to the appropriate ecological assessments.

Conclusion

This submission has been prepared regarding the Draft Galway City Development Plan 2023-2029. Based on the assessments as outlined in this submission, it is evident that the zoning of this site at appropriate density residential is consistent with the guidance as outlined in the Development Plans: Guidelines for Planning Authorities 2007, published by the Department of Housing, Local Government and Heritage.

I respectfully request that the planning Authority gives due consideration to these matters in the preparation of the forthcoming plan.

The request of this submission is for the designation of residential zoning on the lands outlined in this submission to accommodate family need, local need and to assist with implementing the objectives of the government's policy, *Housing for All*.

Is mise le meas,


Carmel Kenny



Submission delivered in person by hand to the Planning Department, Kildare County Council, Aras an Condae, Newbridge Road, Naas, County Kildare