

Statement of Rationale for Childcare Provision

Proposed Large-scale Residential Development

Port Road and St Margaret's Road, Killarney, Co. Kerry

Client: Portal Asset Holdings May 2024

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Introduction

1.1 Purpose of Document

This statement has been prepared in support of the proposed development and outlines the schemes rationale regarding provision of childcare facilities.

The proposed development is a residential scheme consisting of 224 units off Port Road, Killarney. The proposal includes one childcare facility. Given that the majority of units (64%) within the scheme will consist of 2 bedrooms or less, we consider that the delivery of a single 334 m² creche, with capacity for 46 child spaces, will be sufficient to meet the needs of the proposed development. This was previously accepted by Kerry County Council and An Bord Pleanála as an appropriate proposal for the former 228 unit proposed residential development on the site.

1.2 Demographic Profile

Table 01 indicates that while the population of the 2 no. Electoral Divisions that Killarney falls within (Killarney Urban and Killarney Rural) has increased by c. 13% between 2011 and 2022, the preschool age population has experienced a fall of 11.5% in this period.

State	2011	2016	2022
0-4 year olds	356,329	331,515	295,415
Total Population	4,588,252	4,761,865	5,149,139
% 0-4 Year olds	7.8%	7.0%	5.7%
County Kerry	2011	2016	2022
0-4 year olds	10,025	9,020	8,300
Total Population	145,502	147,707	156,458
% 0-4 Year olds	6.9%	6.1%	5.3%
Killarney Urban & Rural Electoral Division	2011	2016	2022
0-4 year olds	1082	1027	958
Total Population	16,135	17,778	18,222
% 0-4 Year olds	6.7%	5.8%	5.3%

Table 01 - Census 2011,2016 and 2022 Figure for Pre-School Cohort

Overall, this cohort now represents just 5.3% of the total population in Killarney compared to 6.7% in 2011. While this reflects the national trend the proportion of the population accounted for by this pre-school cohort is notably smaller in County Kerry and Killarney than nationally (ref Table 01).

It was also apparent from the 2022 Census that the average household size in the Killarney Urban and Rural Electoral Divisions (ED) at 2.59 persons was below the national average of 2.74, with Killarney Urban ED being notable low at 2.42 persons per household.

The Kerry County Development Plan (CDP)– Volume Two - Killarney Town Development Plan 2022 – 2028 notes that the Killarney Urban ED had the highest average age for the larger towns category in Ireland in the 2016 Census at 42.3 years. This has increased from 40.8 years in the 2011 census, a percentage change of 3.7%. This average age is reflective of the ageing population of the County and the popularity of Killarney as a retirement destination.

1.3 Housing Mix

The proposed scheme will consist of 224 residential units comprising 76 no. dwelling houses and 148 no. duplex and apartment units. In terms of housing mix, the scheme includes the following:

- 30 no. 4-bedroom units (13.5%)
- 50 no. 3-bedroom units (22%)
- 114 no. 2-bedroom units (51%)
- 30 no. 1-bedroom units (13.5%)

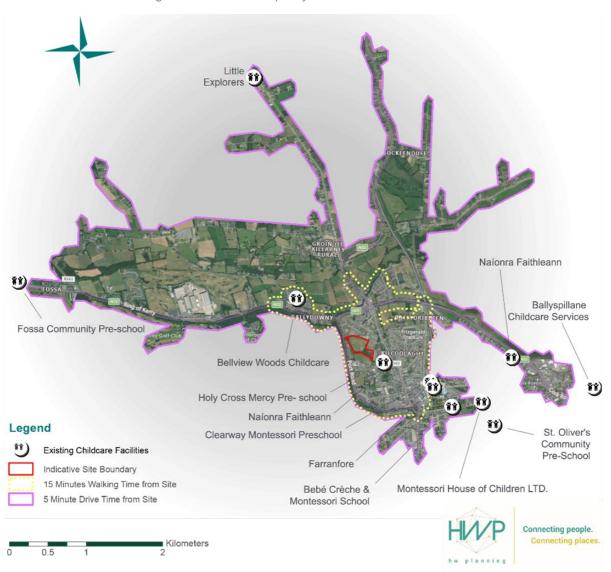
We anticipate that the 3+ bedroom dwellings (35.5% of total mix) will provide principally for family accommodation needs within the development.

Based on the demographic profile of Killarney we envisage that the primary market for the proposed apartments in the Port Road scheme will be retirees and young professionals working in the many employment centres within Killarney. The CDP Volume Two Killarney Town Plan recognizes that Killarney "is influenced by a unique set of circumstances" which put pressure on local accommodation; amongst these are its role as an international tourist destination, and the absence of affordable housing and accommodation requirements to cater for a significant number of seasonal workers.

In support of this analysis, we have reviewed identified capacity for each of the 11 childcare facilities in proximity to the proposed development. The Tusla website provides total capacity data for each registered facility which indicates a total capacity of 665 no. childcare places in the nearby facilities in 2023. Based on the snapshot of the attendance in each facility in the latest Tulsa pre-school inspection reports, predominantly in 2023, it can be extrapolated that there is a potential residual; capacity of 286 childcare spaces proximate to the site. It is acknowledged however, that attendance levels fluctuate significantly on a day-to-day basis and this assessment of capacity is purely indicative and does not take into account age group, or whether the provision is sessional,

¹ Potential capacity has been determined by reviewing reported attendance figures for each facility, and by comparing with each facilities identified capacity.

part-time or full-time. Notwithstanding the above, this assessment is based on the best available information on existing childcare service capacity².



TUSLA Reference Number	Name	Tusla Capacity	Children In Attendance (Tusla Inspection)	Potential Capacity
TU2015KY008	Ballyspillane Childcare Services	86	31	55
TU2015KY009	Bébé Crèche & Montessori	75	42	23

² Kerry County Childcare were contacted and they supported this view.

TU2015KY012	Bellview Woods Childcare	170	136	34
TU2015KY030	Clearway Montessori School	22	18	4
TU2015KY048	Fossa Community Preschool	18	15	3
TU2015KY054	Holy Cross Mercy Preschool	88	38	50
TU2017KY501	Little Explorers	20	9	11
TU2016KY007	Montessori House of Children LTD.	53	21	32
TU2015KY096	Naoinraí Faithleann (Belview Woods)	22	14	8
TU2016LK005	Niki O'Connell Montessori School AMI	45	30	15
TU2015KY117	St. Oliver's Community Pre-School	66	15	51
Total	11 Facilities	665	369	286

Table 02 – Existing Childcare Facilities

Policy Context

The national Childcare Guidelines for Planning Authorities, 2001 provide a framework to guide both local authorities in preparing development plans and assessing applications for planning permission, and developers and childcare providers in formulating development proposals.

2.1 Childcare Guidelines for Planning Authorities 2001

Appendix 2 of the guidelines establishes an indicative standard of one childcare facility per 75 dwellings in new housing areas. One facility providing a minimum of 20 childcare places is considered to be a reasonable starting point in this regard. The guidance acknowledges that other case-specific assumptions may lead to an increase or decrease in this requirement.

The guidelines emphasis that the results of any childcare needs analysis carried out as part of a county childcare strategy should also be considered.

Appendix 2 also states that the threshold for provision should be established having regard to the existing geographical distribution of childcare facilities and the emerging demographic profile of areas.

2.2 Circular PL 3/2016

In March 2016, the Government issued a circular in relation to childcare facilities under the early Childhood Care and Education (ECCE) Scheme. In accordance with the stated aspiration to increase access to childcare nationally, the circular requests that local planning authorities:

- Expedite all pre-planning application consultation requests from childcare facility providers in relation to proposals to extend opening hours, to increase capacity or to provide new facilities.
- Expedite, insofar as is possible, consideration of all planning applications or Section 5
 declaration submissions in respect of childcare facilities in order to facilitate the expansion of
 required capacity as appropriate.

2.3 Universal Design Guidelines 2019

In June 2019, the Minister for Children and Youth Affairs launched the Universal Design Guidelines for Early Learning and Care Settings. These guidelines are an important step in making all Early Learning and Care services accessible to all children. This publication offers guidance on the refurbishment, renovation and building of centres for Early Learning and Care in Ireland. The guidelines apply to both new-build and retrofit projects and provide a flexible Universal Design framework to ensure that settings are accessible, understandable and easy to use for all children, staff, families and visitors.

The Universal Design ELC setting comprises four quality features;

- Site Location, Approach, Entry and Site Layout
- Entering and Moving about the ELC setting
- Key Internal and External Spaces
- Elements and Systems

2.4 Sustainable Urban Housing Design Standards for New Apartments - Guidelines for Planning Authorities' (2022)

We note section 4.7 of the 2022 Apartment Guidelines which states that:

"One-bedroom or studio type units should not generally be considered to contribute to a requirement for any childcare provision and subject to location, this may also apply in part or whole, to units with two or more bedrooms."

2.5 Kerry County Development Plan 2022 - 2028

We also note the CDP planning policy KCDP 6-2 in terms of childcare which states that it is an objective of the Council to:

'support the provision and distribution of a range of community infrastructure facilities in accordance with the Settlement and Core Strategies to meet the needs of the County's population structure in conjunction with other statutory, voluntary, private sector agencies and community groups'.

Proposed Childcare Provision

Appendix 2 of the Childcare Guidelines for Planning Authorities establishes a standard that where 75 dwellings are constructed, one childcare facility providing a minimum of 20 childcare places is considered reasonable. On this basis, the need to provide for 40 childcare places would be triggered by reaching a threshold of 150 units, 60 places by a threshold of 225 units, 80 places by a threshold of 300 units etc.

Furthermore Section 4.7 of the 2020 Apartment Guidelines establishes that one bedroom units and to some extent two bedroom units should not generally be considered to contribute to a requirement for any childcare provision.

Of the proposed 224 units the majority (64.5%) will consist of 2 bedrooms or fewer, we consider therefore that the delivery of a single 46 child space creche (334 sq. m) will be sufficient to meet the needs of the proposed development.

3.1 Rationale

Based on Section 4.7 of the Apartment Guidelines the following assumption has been made:

 The 30 no. 1-bedroom units are all excluded from consideration in relation to generating a childcare requirement.

The childcare provision is being made based on the inclusion of all 30 no. 4-bedroom units, all 50 no. 3-bedroom units and, notwithstanding Section 4.7 of the apartment Guidelines, all 114 no. 2-bedroom units. In total this represents 194 no units. Based on Appendix 2 of the Childcare Guidelines this number of units would trigger the requirements for a 40 childcare place facility.

The proposal to provide a 46-child space facility is therefore in excess of and fully compliant with the Appendix 2 thresholds³. This will be 334 m² in area and will be located in a purpose built structure with dedicated outdoor play area. Suitable provision is made for supporting drop-off facilities, staff and visitor parking in accordance with guidelines.

This assessment has been prepared in accordance with the adopted policies of Kerry County Council and the National Childcare Guidelines. Furthermore it should be noted that this quantum of provision was accepted by ABP in relation to the previous SHD application for 228 no. dwelling on this site. (ABP-312987-22).

An evaluation of CSO data confirms that County Kerry has experienced a fall in its pre-school population in recent years. A review of public records indicates the presence of a number of childcare facilities in close proximity to the subject site. Notwithstanding this, and the presence of a

³ The inclusion of all of the 2-bed units triggers the requirement for a 40-place creche (in excess of 150 units). Again it is acknowledged in policy that not all 2-beds will contribute to childcare demand.

significant number of 2 bed units in the proposed development, provision has been made on site for a 46-child place creche in full accordance with established standards.



HW Planning 5 Joyce House, Barrack Square, Ballincollig, Cork P31 KP84

www.hwplanning.ie info@hwplanning.ie +353 (0)21 487 3250

Directors: Harold Walsh Conor Frehill

Company Reg. No. 486211

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