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Submission attached.

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SUBMISSION

to

EASTERN & MIDLAND REGIONAL ASSEMBLY: REGIONAL SPATIAL & ECONOMIC STRATEGY DRAFT, 2018

Client: W.T.N.B Partnership

21st January 2019

1.0 INTRODUCTION

David Mulcahy Planning Consultants Ltd have been engaged by **W.T.N.B Partnership** to make a submission to the Eastern and Midlands Regional Assembly RSES Draft 2018.

This submission meets the 23rd January 2019 for making a submission.

W.T.N.B Partnership own 11 hectares of lands at Walshestown, Newbridge, Co. Kildare which was previously zoned low density residential but was dezoned under the 2013 Newbridge Local Area Plan. The lands are fully serviceable and 'ready to go'. Moreover, whilst many residential zoned lands are constrained by the need for foul infrastructure, these lands can connect into the Kilcullen-Osberstown Sewer and are not therefore constrained. W.T.N.B Partnership are fully funded and ready to act on any permission for housing that they obtain.

The purpose of this submission is to highlight the lack of emphasis placed on Newbridge Town within the draft RSES despite it being the largest populated town in Co. Kildare and indeed one of the largest populated towns in the Eastern and Midlands Regional Assembly area. The submission also highlights the need to prioritise 'ready to go' sites over other residential zoned lands which are not cable of being acted upon in the short-medium terms due to infrastructure constraints.

2.0 NEWBRIDGE

It is highlighted to the Assembly that Newbridge does not receive any mention in the draft Guidelines despite being the **10th most populated town in the country** at present, the **7th most populated in the EMRA** and the **most populated in Kildare**, with a current population of 22,742 based on the 2016 Census.

Although not specifically stated, Newbridge is considered under the Draft EMRA to be a 'Medium - Large sized Settlement' – *towns with a population of over 5,000 persons where the policy response is consolidation, coupled with targeted investment.*

This classification is below that of a 'Key Town' yet, as can be seen from the Table below, Newbridge has a larger population than many other towns in the EMRA Hinterland and Outer Region which have obtained the higher 'Key Town' classification – towns highlighted in red text.

Under the Regional Planning Guidelines 2010-22, Newbridge enjoyed the status of a Large Growth Town II, reflecting its high-quality rail and motorway connections to Dublin, and was also a Primary Economic Growth Town. This status has clearly been **downgraded significantly** under the draft RSES, putting the town on a par with much smaller settlements.

We further note that the county town in Kildare i.e. Naas has not been afforded Regional Growth Centre status. This contrasts markedly with County Louth having two such designated settlements. The other Regional Growth Centre designation has been afforded to Athlone. This leaves no Regional Growth Centre south of Dublin and represents an imbalance within the EMRA. We submit that Naas should be afforded Regional Growth Centre status to address this imbalance. This would then allow Newbridge to be designated as a Key Town reflecting its size and strategic location.

In summary it is submitted to the EMRA that given its population, strong employment profile (Pfizer, Whitewater, Bord na Mona, Pennys, Lidl etc) and strategic location (M7, rail) that **Newbridge should be identified in the RSES as a 'Key Town'**.

Most populated towns in Ireland

1. Drogheda, Louth (40,956, + 6.2%)
2. Swords, Fingal (39,248, + 6.3%)
3. Dundalk, Louth (39,004, + 3.1%)
4. Bray, Wicklow (32,600, + 2.3%)
5. Navan, Meath (30,153, + 5.7%)
6. **Kilkenny, Kilkenny (26,512, + 8.6%)**
7. **Ennis, Clare (25,276, - 0.3%)**
8. Carlow, Carlow (24,272, + 5.4%)
9. Tralee, Kerry (23,691, no change)
10. **Newbridge, Kildare (22,742, + 5.5%)**
11. **Portlaoise, Laois (22,050, + 9.5%)**
12. Balbriggan, Fingal (21,722, + 8.8%)
13. **Naas, Kildare (21,393, + 3.3%)**
14. **Athlone, Westmeath (21,349, + 5.9%)**
15. **Mullingar, Westmeath (20,928, + 4.1%)**
16. Celbridge, Kildare (20,288, + 3.8%)
17. **Wexford, Wexford (20,188, + 0.6%)**
18. **Letterkenny, Donegal (19,274, - 1.6%)**
19. **Sligo, Sligo (19,199, -1.3%)**

Source: CS0 2016

Red text highlights Key Town in the EMRA with smaller populations than Newbridge. Green text highlights towns outside the EMRA.

3.0 WALSHESTOWN LANDS

WTNB Partnership is an Alternate Investment Fund with Solas Financial acting as the investment fund manager¹. They have freehold title over 11 hectares of lands at Walshestown, Newbridge, Co. Kildare, opposite Walshestown Abbey housing estate – see location map below.



Fig No.2.1 Site Location Map showing subject lands to south of Newbridge town (source: Myplan.ie - OSI Licence No.EN 0080915)

¹ Solas Financial is a registered alternate investment fund manager (AIFM) with the Central Bank of Ireland (Institutional code c154717).



Fig No: 3 Aerial photograph of subject lands, dated July 2013 (source: Bing Maps).

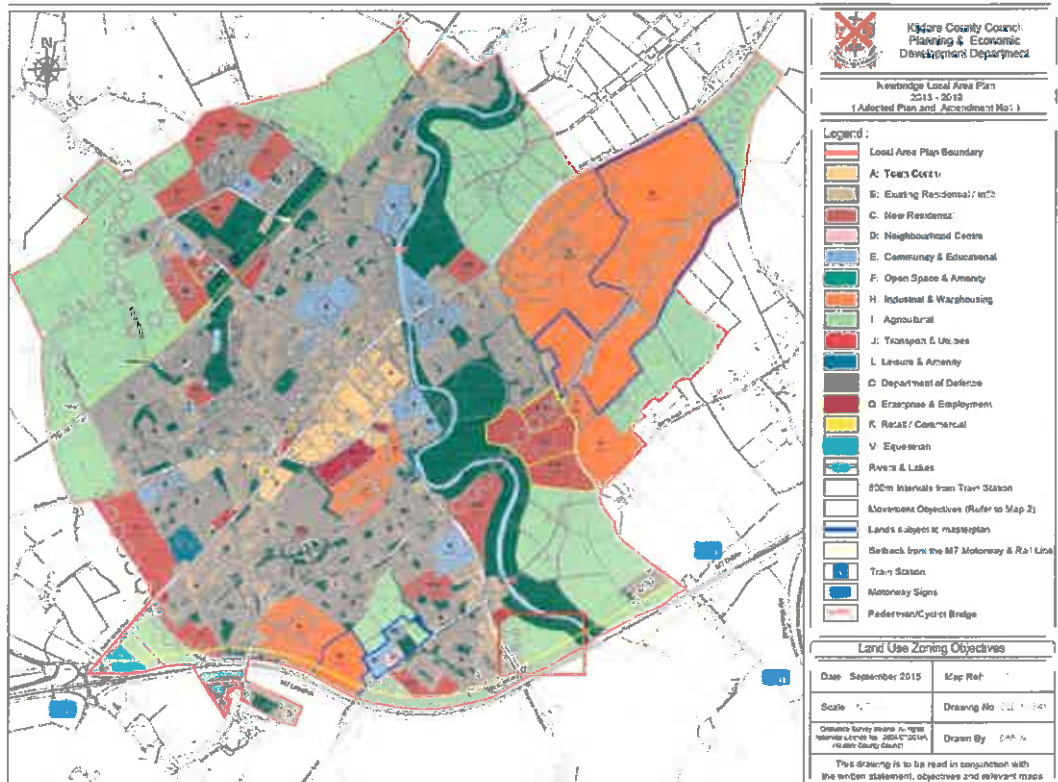


Fig No.4 Location of subject lands within Newbridge LAP 2013-19 Zoning Map

3.1 Dezoning

The draft RSES are very clear that lands should be prioritised rather than dezoned:-

"... the consideration of development land prioritisation measures by local authorities rather than 'dezoning' of lands, where there may be a surplus, would be more appropriate".

In the 2003 Newbridge Local Area Plan the subject lands were primarily zoned Objective D - *"To provide for low density residential development"* where generally no more than 15 houses per hectare (6/acre) were to be provided.

The subject lands were subsequently dezoned in the 2013 Newbridge LAP. We agree with the avoidance of dezoning stipulated in the RSES and submit that lands of this nature which are clearly suitable for residential development should not have been dezoned and should be available for housing development.

3.2 'Ready to Go' Lands

The draft RSES note that *"the zoning of land and planning permission alone do not necessarily guarantee delivery and population growth in accordance with projected, target timeframes ... much closer attention will need to be paid to actual delivery ... effective ways to tackle any tendencies toward land and/or planning permission hoarding or excessively slow delivery included ... the release of alternate lands"*.

This reflects the views expressed in the recent Circular to Planning Authorities from the Department (PL 8/2016- Rebuilding Ireland) which specifically noted that not all zoned land is actually available for residential development due a variety of reasons and therefore local authorities should consider alternative unzoned but ready to go land where the potential for development is better.

However, this consideration of alternate lands is not being reflected on the ground. WTNP Partnership have drawn Kildare County Councils attention to the subject lands and demonstrated that they are 'ready to go' in terms of a housing development but to no avail. It is submitted that there should be a more concrete mechanism whereby the Council are required to provide a **written assessment** of any submissions for lands to be considered for as alternates to existing residential zoned lands that are not yielding housing. We submit that the Guidelines should contain a policy objective to this effect.

In this particular case there are unique circumstances which make the subject lands more suitable than other lands in the town. Residential development in Newbridge is plagued by foul (Newbridge East Sewer Interceptor) and surface water infrastructure constraints which has curtailed development in recent times.

Critically the **foul infrastructure constraints** which affect the development of residential zoned lands in Newbridge town however, **do not affect the subject site as it is on a different foul network** (Kilcullen – Osberstown 450 diameter).

The subject lands therefore present as an ideal example of where alternate unzoned lands could, and should, be considered for housing development - but the proper consideration of same is not happening on the ground.

4.0 CONCLUSION

The town of Newbridge is the tenth largest in the country, the seventh largest in the EMRA and the largest in County Kildare, but this is not being reflected in the settlement hierarchy in the RSES. Newbridge should be identified as a 'Key Town' in the RSES reflecting its population, strategic connections to Dublin and its strong employment base.

The draft RSES guidelines recommend that prioritisation rather dezoning of lands should occur. WTNP Partnership's lands in Newbridge were dezoned under the

2013 Newbridge LAP despite being eminently suitable for residential development and remain so today.

The draft RSES guidelines note that *the zoning of land and planning permission along do not necessarily guarantee delivery and population growth in accordance with projected, target timeframes the release of alternate lands may need to be considered.* It is submitted that there should be a more concrete mechanism whereby the Council are required to provide a written assessment of any submissions for lands to be considered for as alternates to existing residential zoned lands that are not yielding housing.

Lands owned by WTNP Partnership in Newbridge are ready to go and are not constrained in the same manner as so many other lands in the town as they are on a different foul network. They present as an ideal example of where alternate unzoned lands could, and should, be considered for housing development.

Signed:



David Mulcahy
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