

Submission

On the

**Draft Regional Spatial and Economic Strategy for the Eastern
and Midlands Regional Assembly**

On behalf of

Crylock Developments Ltd.

To

*Eastern & Midland Regional Assembly
3rd Floor North, Ballymun Civic Centre
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22nd January 2019



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1.0 INTRODUCTION

- 1.1 On behalf of our client, **Crylock Developments Ltd., Newhall, Naas, Co. Kildare**, we wish to make a submission on the Draft Regional Spatial and Economic Strategy for the Eastern and Midlands Regional Authority. Our client is the owner of a significant landholding in the environs of Naas, which is strategically located in close proximity to the Newhall interchange on the M7 motorway.
- 1.2 A submission was previously made on behalf of our client (appended as Appendix A to this submission) on the pre-draft issues paper for the RSES, which set out in detail a rationale for the location of space extensive employment uses at Naas, and noted in particular the appropriate nature of our client's lands at Naas for a future agglomeration of space extensive uses.
- 1.3 The rationale previously provided made specific reference to supporting policies and objectives set out in existing and emerging planning policy at the time. This policy backing for the location and relocation of space extensive employment uses to locations outside of the M50 ring (with appropriate levels of accessibility) has now effectively been copper fastened by the formal adoption of the NPF which specifically targets this new spatial distribution for these uses. As will be set out below, it is considered appropriate that the RSES should specifically reflect these objectives, and move to identify locations in the hinterland area which would be suitable to accommodate new and relocated space extensive employment uses.
- 1.4 The identification of appropriate locations for the relocation and expansion of space extensive employment uses is imperative in the short term, as Brexit (in any form) is likely to lead to further increases in demand for such development, as Irish and multi-national companies seek to quickly adapt their supply chains to take account of Britain's forthcoming exit from the EU.
- 1.5 The current submission seeks to avoid the reiteration of the grounds set out in the previous submission on the pre-draft stage, but rather seeks to build upon these grounds and set out specific suggestions for minor amendments to the Draft RSES document, which it is respectfully submitted would give direct effect to the policies and provisions of the NPF while identifying Naas as a location for space extensive employment to develop or relocate (in accordance with the growth enablers for Dublin set out within the NPF).

2.0 PREVIOUS PRE-DRAFT SUBMISSION

- 2.1 The key tenets of the previous pre-draft submission (included as Appendix A) can be briefly summarised as follows (the appended submission should be referred to for supporting detail as necessary):
 - The town of Naas has been recognised as a Large Growth Town heretofore under the RPGs and accordingly has been designated for housing and employment growth;
 - The RSES issues paper noted the significant population of the town;

- Existing and emerging planning policy favours employment growth at major population nodes;
 - The NPF seeks the relocation and development of space extensive (e.g. logistics and warehousing) employment uses outside the M50 ring;
 - The town of Naas, and the lands at Newhall to the north of the M7 interchange in particular would be exceptionally well suited to facilitate space extensive, less intensive employment development on lands which are appropriately served in terms of access and services;
 - Such development would enhance the jobs / population ratio in the eastern SPA of the Region;
 - The RSES should therefore identify areas such as Naas and the subject lands at Newhall for space extensive employment development.
- 2.2 The previous submission also provided information in respect of the location, context and planning history of our client's landholding at Newhall. In summary, the lands are located approximately 2 kilometres to the west of Naas Town Centre and adjacent to the Newhall Junction of the M7 (see Figure 1 below). The lands have access to a 750mm diameter foul sewer along the Rathangan Road, potable water and electricity. The lands comprise of approximately 110 hectares in area.
- 2.3 A new sewage pipeline from Newbridge to Osborsetown treatment facility will cut through the subject site from the R445, traversing the site on its western side, and will be in the form of a 900 mm pipeline, in addition, a pumping station will be located on the northern section of the subject lands. The appointed contractor (Roadbridge) are due to begin on site for this project within a week.
- 2.4 The upgraded M7 and Junction 10 upgrade is due to open in March 2019, providing for an exceedingly high level of accessibility for the area via the national road network. The upgraded / new junction 10 directly adjoins our client's lands and is c. 600 metres from the location of the proposed and previously permitted roundabout and entrance to the subject lands.
- 2.5 Furthermore, EirGrid announced in a press release of November 23rd 2018, that it is intended to develop a new electricity infrastructure project to help meet the growing demand for electricity in the East. This growth is due to increased economic activity and the planned connection of new enterprises in the region. Under this plan, power will be transferred from the west of the country, to be distributed to the network in Meath, Kildare and Dublin. This will serve to further reinforce the electricity grid in the vicinity of the subject site. The subject site currently is traversed by a 220kV and a 110kV overhead power line from the existing Dunnstown distribution site which will be subject to the proposed upgrading of the network in the area.
- 2.6 Based on the above, it is clear that the subject site benefits from existing and planned infrastructure and services provision which militates strongly in favour of the development of the subject lands for space extensive employment uses. The lands benefit from a clear comparative advantage in this regard, and are well suited to capitalise on existing, ongoing and future investment in the provision of services.

- 2.7 The subject lands are currently in agricultural use, and are substantially flat, with very little gradient. They are therefore well suited topographically for the development of space extensive employment uses.
- 2.8 The subject lands are considered to occupy a strategic location within County Kildare, being located on the edge of the existing Naas built up area, on the M7 Economic / Transport Corridor, and offer a suitable location for the future development of Industrial / Warehousing / General Employment uses and the relocation of such uses from within the M50 ring as espoused in the NPF. There is significant demand at present within the Greater Dublin Area (GDA) for industrial / warehouse / logistic floorspace and sites due to the continuing economic growth seen nationwide (and particularly in the GDA) over the past three years, with a clear preference for premises and sites well served by major road and motorway infrastructure. It is imperative for the successful delivery of economic growth and employment development that such lands are made available and zoned appropriately.
- 2.9 Permission was previously granted by Kildare County Council on the 3rd of September 2007 (under Reg. Ref. 06707) for development on the subject lands comprising a business park / industrial estate consisting of approximately 11 no. sites for further industrial development, construction of 1 manufacturing unit on one of these sites with the remaining sites to be subject to future planning permission. This permission was subsequently extended until September 2017, but has now expired.

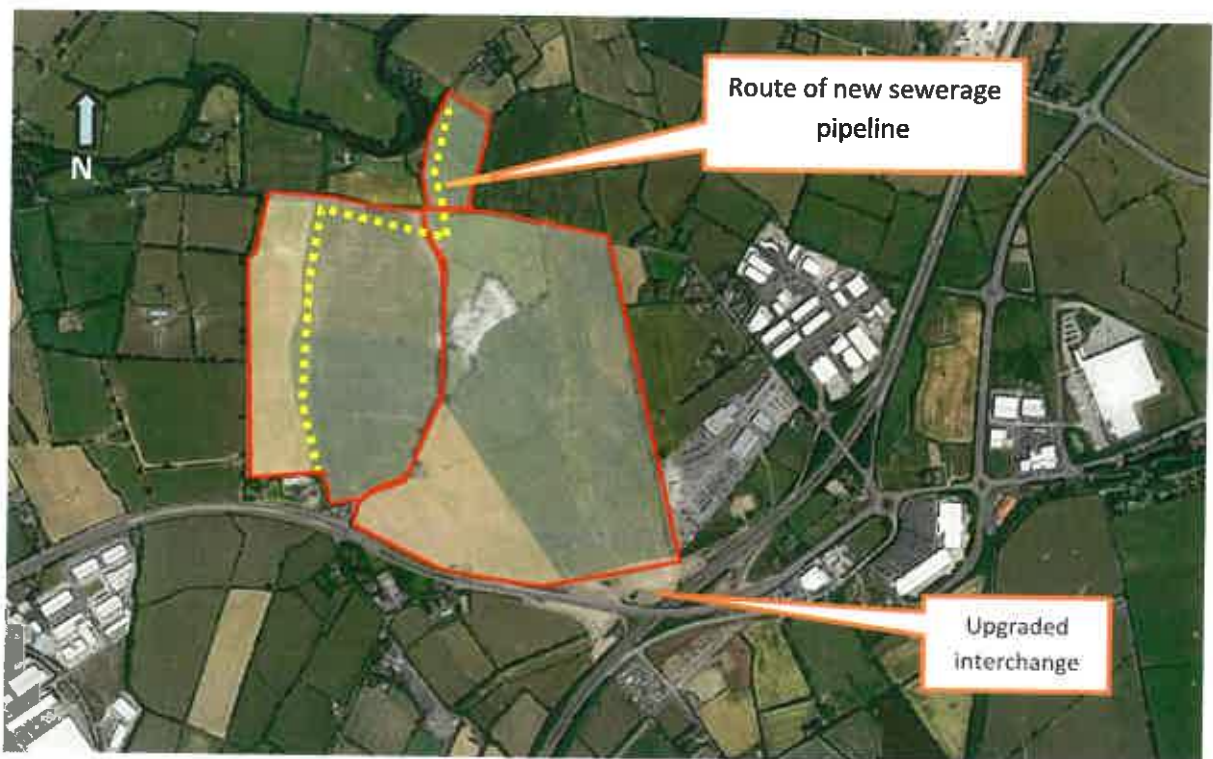


Figure 1: Site Location outlined in red

3.0 POINTS OF RELEVANCE WITHIN THE DRAFT EMRA RSES

- 3.1 Bearing the above points in mind, it is noted that the Draft RSES document does, in general terms, support the growth of Naas and its role as an economic driver for the surrounding area, while also noting the importance of identifying strategic locations for employment growth, which should be selected based on the nature of the use envisaged and the accessibility required for such uses, vis a vis the accessibility profile and locational characteristics of potential target areas.

Naas as a Key Settlement

- 3.2 The Draft RSES identifies Naas as a key settlement located within the Hinterland Area of the region with access to motorway and rail connectivity.
- 3.3 Key towns such as Naas are identified as economic drivers and employment centres for the region. Naas is noted for having a greater number of jobs than resident workers within the settlement area – in line with its role as an economic driver and employment centre.
- 3.4 The settlement strategy map on page 39 of the draft document identifies Naas as a Key Settlement within the hinterland area, located on a key road and adjacent to a rail line. Our client's landholding, as noted above, is located to the west of Naas town centre, with optimal access to the M7 roadway via the upgraded interchange. This location benefits from a high level of accessibility from Dublin and all other major cities in the State, due to the location of the lands outside of the capital and the M50 ring and on the national road network.

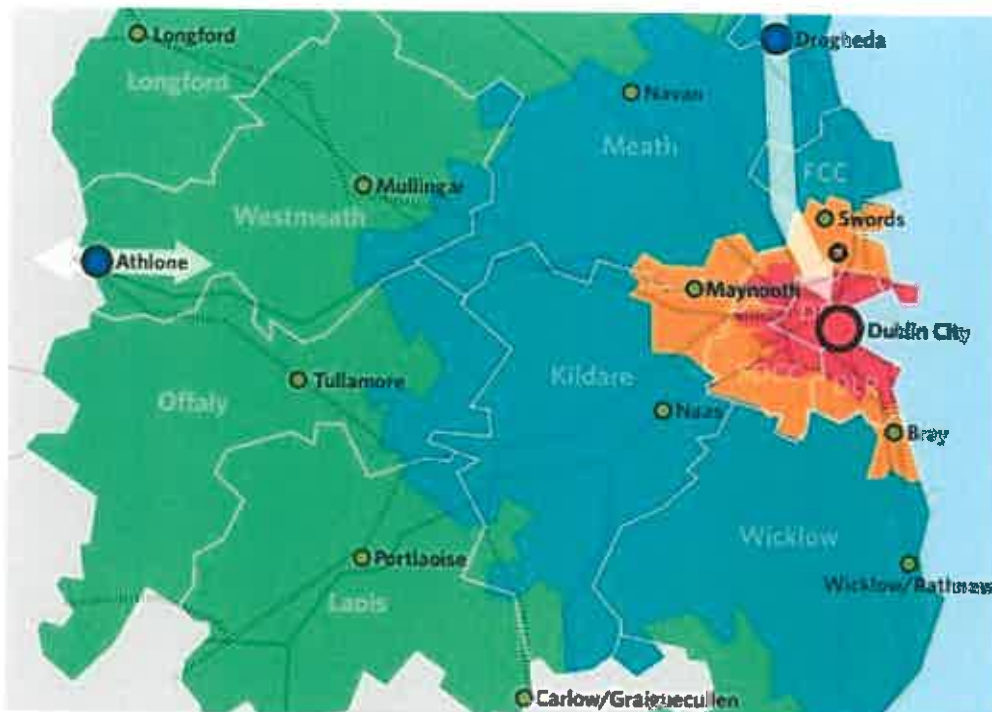


Figure 2: Extract from the RSES Settlement Strategy map

- 3.5 The definition of 'Key Towns' within the Draft RSES is as follows:

"Large economically active service and/or county towns that provide employment for their surrounding areas and with high-quality transport links and the capacity to act as growth drivers to complement the Regional Growth Centres".

- 3.6 In terms of transport profile, Key Towns are identified as *"Self-sufficient settlements (Outer Region) and commuter settlements with high quality public transport and growth capacity at transport nodes"*.

- 3.7 The policy response indicated for Key Towns is as follows: *"Commensurate population and employment growth, on high quality public transport corridors coupled with investment in services, amenities and sustainable transport"*.

- 3.8 Policy RPO 4.23 of the RSES is: *"Key Towns shall act as economic drivers and provide for strategic employment locations to improve their economic base by increasing the ratio of jobs to workers"*.

- 3.9 In relation to Naas, the Draft Strategy notes that there are strong links between the town and nearby settlements, with the RSES to support enhanced links with Sallins train station. The Draft strategy notes the following in relation to the town: *"Consolidation and regeneration shall be a key priority and objective for the development of Naas town with at least 30% of all development to be delivered on Brownfield and infill lands with a focus on the regeneration of the town centre..."*

- 3.10 The following two policy objectives are set out within the draft document, which relate specifically to Naas:

- ***"RPO 4.33: Promote the improvement of the transport network within and serving Naas town, including delivery of a robust and efficient walking, cycling and bus network with strong links to Sallins Railway Station, key destinations within the town and to the North West Quadrant and town centre area."***
- ***RPO 4.34: Support the use of the Grand Canal for amenity, recreation and sustainable transport purposes."***

Locations for Employment Growth

- 3.11 Chapter 6 of the Draft Strategy deals with Economy and Employment, which notes the importance of smart specialisation and clustering / agglomeration in encouraging investment and economic development.

- 3.12 Guiding principles for identifying locations for strategic employment development are set out on page 91 of the Draft document (to be used by planning authorities for the identification of strategic employment locations within their development plans). Among these are principles of relevance including that planning authorities must have regard to location of current employment, density of workers, land take and infrastructure dependency (e.g. roads, power, and water), potential relocation of enterprises which may be better suited to other locations to facilitate the (re)development of urban areas.

4.0 GROUNDINGS OF SUBMISSION AND SUGGESTED AMENDMENTS

- 4.1 As set out above, our client welcomes the provisions in the draft RSES which underline the importance of Naas as a key settlement which provides services and employment for its surrounding area. This is borne out by the ratio of jobs to workers resident in the town.
- 4.2 Notwithstanding the relatively strong level of employment seen in the town at present, it is considered that significant further employment growth at Naas would be appropriate, given the town's role in employment provision for the surrounding area which is comparatively populous, taking in areas such as Kill and Sallins, the populations of which were not included in the calculation of the jobs / workers ratio for Naas by the CSO, as reflected within the Draft RSES document. As both a spatial and economic policy document, it is respectfully submitted that it would be appropriate for the final RSES to reinforce the potential of lands on the M7 corridor and contiguous to the built up area of the county town of Kildare as an appropriate location for space extensive employment.

Location and Relocation of Space Extensive, Lower Intensity Employment Uses

- 4.3 To achieve a model of more compact, sustainable growth, the NPF aims to "make better use of underutilised land including 'infill and brownfield' sites. An important development put forward within the NPF to achieve this is the relocation of less intense uses to greenfield sites outside the built-up urban areas, in order to provide space for the location of more intensive uses within the city limits (in the case of Dublin within the M50).
- 4.4 It is a stated aim of the NPF (Page 31) to ensure that Dublin's growth is managed so as to avoid further unsustainable residential sprawl. Part of the Draft NPF strategy to achieve this is by freeing up currently underutilised lands in the city via the location of space extensive, low intensity employment uses outside of the urban area.
- 4.5 The NPF, at page 64 also sets out a series of criteria for the selection of locations of employment growth at Regional and Local levels. These include consideration of the relationship between the intensity of the employment use, how space extensive such uses are, and what infrastructure requirements such employment uses have.
- 4.6 The NPF identifies key future growth enablers for Dublin, among which is the following:
- "Relocating less-intensive uses outside the M50 ring in particular and from the existing built-up area generally". (Page 37 of the NPF)*
- 4.7 Throughout the NPF, references are made to the challenges presented by Brexit, both in economic and planning terms (see for example *inter alia* pages 88, 109, 154, and 186). The Draft RSES notes that a proactive response to Brexit-related risks could help mitigate against potential downsides for the economy of the region and the state.
- 4.8 At page 106, in the context of discussing local enterprise, the RSES highlight the potential disruption to existing supply chains which Brexit could wreak. Under Section 6.7 (page

109 of the draft document), Brexit is noted as one of the key challenges facing the economy of the region.

- 4.9 Page 10 of the document states that the *"key economic priorities in Enterprise 2025 that set the parameters for the development of the RSES growth strategy include to; ...*

increase the emphasis on developing Irish owned enterprises – embedding resilience in our enterprise base, enhancing productivity and delivering quality jobs – including supporting companies to navigate their way through Brexit"

- 4.10 Based on current market sentiment, and analysis of potential impacts arising from Brexit, it is increasingly clear (as its noted within the RSES document) that the exit of Britain from the EU will bring about significant changes to the existing supply chains of Irish companies, and international companies operating in Ireland. There are strong indications that companies will be forced to (and are already) realign their supply chains by setting up locations in Ireland, whereas they had previously stored and issued their goods from the UK. This will continue to increase the strong demand for industrial, logistics and warehousing space across all sectors, including the pharmaceutical, food and beverage, technology, and retailing sectors.
- 4.11 These changes will dramatically change how commercial companies operating in the state conduct both their import and export businesses, making the allocation of sufficient, appropriately located lands for the development of new logistics, warehousing, and industrial uses all the more important for the economy of the region and the state.
- 4.12 On the basis of the foregoing, it is respectfully submitted that in order to give full effect to the policies and principles of the NPF, it would be appropriate to bolster the text within the Draft RSES to make specific reference to the relocation of space extensive employment uses to suitable locations outside of the M50 ring.
- 4.13 To give direct effect to the above-stated key growth enabler for Dublin as set out in the NPF it is respectfully submitted that additional text, as set out below, could be added to the 'Guiding principles to identify Locations for strategic employment development' on page 91 of the Draft Document (within Chapter 6 – Economy and Employment).
- 4.14 For ease of reference, the relevant section from page 91 of the Draft RSES is set out below, with the additional suggested text in **green**.

Guiding principles to identify Locations for strategic employment development

These considerations were used as principles to identify the locations for strategic employment development in Chapter 4 and Chapter 5. Local Authorities in Development Plans and through LECPs should apply the same principles. The MASP has identified some of these in the metro area. Planning to accommodate strategic employment growth at regional, metropolitan and local level should include consideration of:

- *Location of Technology and Innovation Poles - Institutes of Technology (IoTs) and Universities, as key strategic sites for high potential growth of economic activity*
- *Current employment location, density of workers, land-take and resource/infrastructure dependency, including town centres, business parks, industrial estates and significant single enterprises*
- *Locations for expansion of existing enterprises*
- *Locations for new enterprises, based on the extent to which they are people intensive (i.e. employees/customers), space extensive (i.e. land), tied to resources, dependent on the availability of different types of infrastructure (e.g. telecoms, power, water, roads, airport, port etc.) or dependent on skills availability, for example the location of space-extensive employment uses at suitable locations outside of the M50 Ring, proximate to the national road network and existing settlements*
- *Locations for potential relocation of enterprises that may be better suited to alternative locations and where such a move, if facilitated, would release urban land for more efficient purposes that would be of benefit to the regeneration and development of the urban area as a whole, particularly in metropolitan areas and large towns*
- *urban areas locations where significant job location can be catered for through infrastructure servicing and proximity to public transport corridors.*

Naas as a Location for Space Extensive Employment Growth

- 4.15 As has been detailed previously within the submission made on the pre-draft stage of the RSES preparation process, it is considered that the town of Naas and its environs, and particularly our client's landholding, is well suited for the delivery of space extensive, less intensive employment growth, in accordance with the NPF. Such employment development could comprise of a combination and agglomeration of new or expanding enterprises, along with space extensive employment uses relocating to more suitable locations outside of the M50 ring.
- 4.16 As has been set out previously, our client's landholding meets all of the criteria set out within the NPF and the RSES for the targeted location of employment uses. The lands are ideally suited to space extensive, less intensive uses due to their location on the edge of Naas, a key settlement with a wider role in employment provision for its surrounding area, the proximity of the lands to the M7 interchange which has undergone recent upgrades, and access to services including water, wastewater treatment, and electricity to support development on the lands.
- 4.17 The accessibility profile of the lands matches the requirements for space extensive uses, due to the direct access to the national road network provided by the land's location.
- 4.18 The suitability of Naas to accommodate logistics, warehousing and light industrial type uses is exemplified and proven by the location of significant existing employment uses in the environs of the town, for example the Aldi distribution centre, the M7 Business Park, Millennium Park, and Naas Industrial Estate. These existing employment uses have capitalised on excellent levels of accessibility, proximity to a large and skilled workforce, and the availability of serviced lands which are topographically and geographically suited to employment generating uses.

- 4.19 The immediate environs of the town include significant areas of undeveloped greenfield lands which are highly accessible, proximate to a significant available workforce and topographically suited to the development of employment generating uses. The town has a notable comparative advantage in terms of accessibility and is located within an area which would benefit from significant employment growth.
- 4.20 This location is also strategically located to cater for increased demand for space-extensive employment floorspace, including logistics, warehousing, and industrial floor space. The current strong demand in these sectors is likely to be increased in the short to medium term by the economic and supply chain effects of Brexit, as posited above.
- 4.21 Having regard to the foregoing, it is respectfully submitted that it would be appropriate to provide for an additional Regional Policy Objective relating specifically to Naas. Such an additional objective could be inserted after RPO 4.34 on page 56 of the draft document, under the Regional Policy Objectives for Naas. The wording which is respectfully suggested for this additional RPO is as follows:

RPO 4.34: Support the delivery of space extensive, less intensive employment development at Naas, including the development of space extensive employment uses in proximity to the M7 corridor, for example to the north of the M7 interchange at Newhall.

- 4.22 It is considered that the foregoing suggested RPO would be appropriate in order to recognise the clear comparative advantage of the subject lands for space extensive employment development. The NPF and the draft RSES documents set out criteria for the selection of locations for strategic employment development at both Regional and Local levels. It is considered that the subject lands meet these relevant criteria and should therefore be recognised as strategically important at a regional level, for the accommodation of both new and relocating less intensive employment development.
- 4.23 It is considered that the identification of such key locations at a regional level for the location and relocation of space extensive employment is imperative if the corresponding goal and growth enabler for Dublin as set out within the NPF is to be achieved.

5.0 CONCLUSION

- 5.1 This submission has been prepared by John Spain Associates on behalf of our client, Crylock Developments Limited. The current submission builds upon the grounds and points set out within a previous submission made on the pre-draft stage of the RSES preparation process. This previous submission is included as Appendix A of the current document.
- 5.2 This submission on the Draft RSES respectfully puts forward minor amendments to the existing draft document, which would serve to give fuller effect to the provisions of the NPF and to identify Naas, and our client's lands to the north of the Newhall M7 interchange as an appropriate location for space extensive employment uses.

- 5.3 We would be grateful for the Assembly's consideration of these suggested amendments during the finalisation of the EMRA Regional Spatial and Economic Strategy for adoption. If you require any further information please do not hesitate to contact us.

Yours Faithfully,



John Spain Associates

Appendix A: Previous Submission made on the Pre-Draft Issues Paper for the RS

Submission

On the

**Pre-Draft Regional Spatial and Economic Strategy for the
Eastern and Midlands Regional Assembly**

On behalf of

Crylock Developments Ltd.

To

*Eastern & Midland Regional Assembly
3rd Floor North, Ballymun Civic Centre
Main Street
Ballymun
Dublin 9
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16th February 2018



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1.0 INTRODUCTION

1.0 On behalf of our client, Crylock Developments Ltd., Newhall, Naas, Co. Kildare, we wish to make a submission on the Pre-Draft Regional Spatial and Economic Strategy for the Eastern and Midlands Regional Authority. Our client is the owner of a significant landholding in the environs of Naas, which is strategically located in close proximity to the Newhall interchange on the M7 motorway (please see Appendix 1 for details of our client's lands).

1.1 The key points which this submission seeks to raise in the context of the Issues Paper for the Pre-Draft Regional Spatial and Economic Strategy are as follows:

- Naas was recognised as a Large Growth Town under the Regional Planning Guidelines for the Greater Dublin Area 2010-2022, and was accordingly designated for growth in both housing and employment.
- The EMRA RSES Issues Paper notes the large population of Naas, at over 21,000 people.
- The existing and emerging planning policy context supports the matching of employment and population growth at strategic locations, and the RSES Issues Paper poses several questions as to how a balance can be struck between existing and future population and employment provision.
- The Draft National Planning Framework seeks to advance the relocation of space extensive, less intensive employment uses from within Dublin's M50 motorway to more appropriate locations outside the M50 ring, thereby freeing up space for high density, higher intensity development within the city. Section 3.7 of the Draft NPF also highlights the need to provide competitively priced development lands for employment uses which are suited to the infrastructural requirements and level of intensity of the use type.
- It is submitted that Naas and its environs (particularly lands proximate to the M7 Newhall interchange) present an ideal opportunity for the location of space extensive employment uses having regard to the highly accessible location of Naas on a multi-modal transport corridor, the availability of appropriate land, and the existing labour force within the town and surrounding areas.
- The development of additional employment in locations such as Naas would serve to improve the population / employment ratio in the Eastern SPA of the EMRA region, thereby improving quality of life and reducing long-distance commuting by fostering the creation of live-work communities.
- It is therefore respectfully submitted that the Regional Spatial and Economic Strategy for the EMRA region should include specific objectives relating to the relocation of space extensive employment uses to appropriate locations outside the M50 such as the environs of Naas, and particularly the extensive lands at Newhall, Naas south, which are strategically located to accommodate such uses.
- It is further submitted that Naas should be recognised as a potential location for significant employment growth in sectors which require larger sites served by high quality transport infrastructure.
- Our client, Crylock Developments Ltd., is the owner of a significant landholding in the environs of Naas, which is strategically located in close proximity to the Newhall interchange on the M7 motorway which is currently undergoing a significant upgrade (please see Appendix 1 for details of our client's lands). It is respectfully submitted that these lands in particular are well suited to accommodate significant investment and employment creation going forward, with a focus on space extensive logistics and warehousing type uses.

- 1.3 This submission seeks to highlight the relevant issues and questions set out within the RSES pre-draft Issues Paper in the context of our client's strategic landholding. The submission sets out the relevant emerging and existing planning policy context (in particular the Draft National Spatial Strategy and the Regional Planning Guidelines for the Greater Dublin Area), and finally sets out in detail the grounds of submission and requested inclusions for the Draft Regional Spatial and Economic Strategy.

2.0 PRE-DRAFT ISSUES PAPER

- 2.0 The Pre-Draft Issues Paper in respect of the Eastern and Midlands Regional Authority's Regional and Spatial Economic Strategy (RSES) was published in November 2017. The Issues Paper seeks to highlight the key issues and questions pertaining to the region, in order to invite submissions on relevant planning and economic development matters from stakeholders and interested parties.
- 2.1 The Issues Paper notes that the EMRA region is geographically the smallest of the Regional Assemblies, but that it boasts almost half of the nation's population, with nearly 816,000 households and over one million jobs. The Issues Paper notes that the population of the EMRA grew by 15% over the ten years to 2016 (i.e. over two intercensal periods). This population growth rate significantly exceeds the average rate of growth for the state of 12% over the same period.
- 2.2 The region boasts a comparatively young and diverse population, and a skilled workforce, with an ability to attract highly educated workers. The issues paper notes that the distribution of these skilled workers influences the demand for services, amenities, housing, transport and employment.
- 2.3 The EMRA area is subdivided into 3 no. SPA Committee areas (the Midlands Region, Eastern Region and Dublin Region).

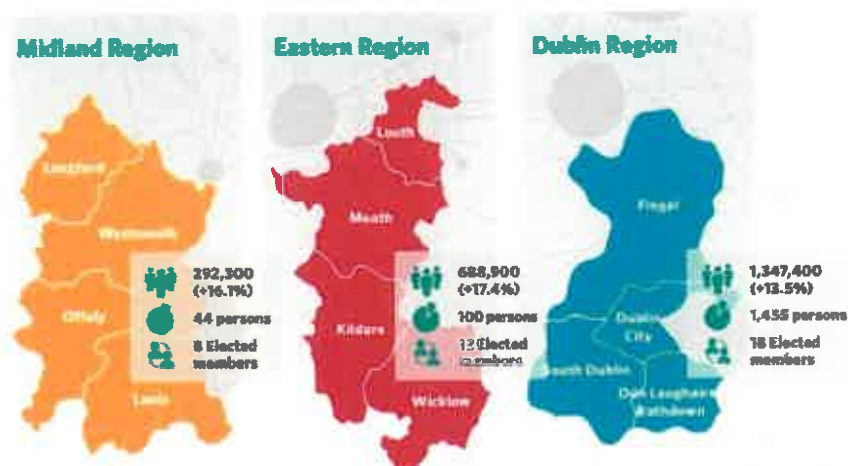


Figure 1: The three SPA Committee areas (Extract of Fig. 2.2 of the EMRA Issues Paper)

- 2.4 Section 3 of the Issues Paper deals with 'People and Places'. It is noted thereunder that "At the core of the RSES will be the consideration of a settlement hierarchy for the region, which sets out the key locations for population and employment growth, coupled with investment in infrastructure and services to meet those growth needs".

- 2.5 The definition of this settlement hierarchy will be based on the emerging National Planning Framework (which is currently in draft form), a review of the existing policy framework, and research and evidence to establish current trends within the region.
- 2.6 The Issues Paper notes the spatial distribution of large towns within the region, with a concentration of urban areas in the eastern portion of the region centring on Dublin City. More than 7 out of 10 people in the region reside in Dublin, or one of the 23 urban settlements in the region with populations of between ten thousand and forty-one thousand people.
- 2.7 The Issues Paper notes the population of Naas as 21,393 at the time of the 2016 Census of Population. The Paper states that some large towns in the region have developed as commuting towns, with many residents commuting to work in the capital city, while other large towns play a greater role in employment provision, some with more jobs than resident workers.
- 2.8 The Issues Paper poses the following questions in relation to the growth and settlement pattern of the region:
- *Where are the key strategic locations for population and employment growth?*
 - *How do we ensure the most effective use of infrastructure and resources?*
 - *How can we encourage better alignment between population growth, location of residential development and employment?*
 - *How do we ensure that every place is able to meet its potential?"*
- 2.9 The Issues Paper notes that the location of employment and accommodation for employees is an important consideration. The paper states that mismatches in these factors can lead to serious implications in terms of long distance commuting, which impacts on quality of life and precipitates strain on infrastructure. The Eastern SPA currently has a number of resident workers which exceeds the number of local jobs by 113,000, a key contributor to the trend of long-distance commuting seen in the region.
- 2.10 With regard to the economic development of the Eastern SPA, the Issues Paper highlights the strong competitive advantage of the area in terms of accessibility and quality for infrastructure. The area is also noted for its centres of education and research, and its higher than average level of skilled workers.
- 2.11 The following key questions *inter alia* are posed in respect of the economic development of the Eastern SPA:
- *"What policy response is required to deal with the adverse effects of the outwards sprawl of the city region?*
 - *How can we achieve better alignment between population and employment growth?"*
- 2.12 The summary of key questions provided on page 57 of the issues paper includes the following:
- *"How can we encourage better alignment between population growth, location of residential development and employment?*
 - *How can economic, environment and social dimensions be approached in the RSES to ensure the delivery of sustainable regional development?*
 - *How best can the RSES address regional disparities to produce a more sustainable, balanced and competitive region?"*

3.0 RELEVANT EXISTING AND EMERGING PLANNING POLICY CONTEXT

Draft National Planning Framework – Ireland 2040 Our Plan

- 3.0 The Draft National Planning Framework (NPF) was published in September 2017, following the consideration of submissions made on the pre-draft issues and choices paper. It is expected that the final National Planning Framework document will be published in Q1 2018, following consultations and extensive review. It is considered likely that the final document will be materially altered from draft stage.
- 3.2 One of the aims at the core of the National Planning Framework is the densification and intensification of Ireland's cities through compact growth, while sustaining jobs and providing for a significant increase in the population of the country by 2040. To achieve this goal, 40% of future housing development is to be directed to existing urban built up areas.
- 3.3 To achieve this model of more compact growth, the NPF aims to *"make better use of underutilised land including 'infill and brownfield" sites.*
- 3.4 A key tenet espoused by the Draft NPF is the relocation of less intense uses to greenfield sites outside the built up urban areas, in order to provide space for the location of more intensive uses within the city limits (in the case of Dublin within the M50). It is a stated aim of the Draft NPF (Page 31) to ensure that Dublin's growth is managed so as to avoid further unsustainable residential sprawl. Part of the Draft NPF strategy to achieve this is by freeing up currently underutilised lands in the city via the location of space extensive, low intensity employment uses outside of the urban area.
- 3.5 The Draft NPF suggests the use of active land management for urban sites, in order to *"relocate existing space extensive uses that may be better suited to peripheral 'greenfield' locations".* (Draft NPF page 51).
- 3.6 The NPF identifies key future growth enablers for Dublin, among which is the following:
- "Relocating less intensive uses outside the M50 ring in particular and from the existing built-up area generally".* (Draft NPF page 53)
- 3.7 Having regard to the above, it is clear that the Draft NPF envisages the incremental movement of 'space extensive', lower intensity employment uses beyond Dublin's M50 toward more suitable green-field lands served by the national road network.
- 3.8 With regard to urban employment growth, the Draft NPF (Section 3.7, page 49) states the following:
- "At an urban scale, it is important to identify locations where enterprises can access competitively priced development lands, utilities and commercial properties to the highest standards available internationally. Planning to accommodate strategic employment growth at regional and local level should include consideration of:*
- *Current employment location, density of workers, land-take and resource/infrastructure dependency, including town centres, business parks, industrial estates and significant single enterprises.*
 - *Locations for expansion of existing enterprises.*

- *Locations for new enterprises, based on the extent to which they are people intensive (i.e. employees/customers), space extensive (i.e. land), tied to resources, dependent on the availability of different types of infrastructure (e.g. telecoms, power, water, roads, airport, port etc.) or dependent on skills availability."*

3.9 National Policy Objective 9B of the Draft NPF is as follows:

"Regional and Local Authorities will identify and quantify locations for employment growth, where suitable, in urban areas generally."

3.10 All of the above points towards the need to identify additional employment lands at suitable locations outside the M50 ring (locations such as the environs of Naas along the M7 corridor) to cater for the relocation of (and new) space extensive employment uses.

Regional Planning Guidelines for the Greater Dublin Area 2010-2022

3.11 The Regional Planning Guidelines for the Greater Dublin Area were published in 2010, with an aim of directing the growth of the Greater Dublin Area (GDA) and implementing the strategic planning framework set out in the National Spatial Strategy.

3.12 The RPGs seek to foster the achievement of critical mass in population, services and employment for towns which are designated for growth. The RPGs state that this approach *"can serve the surrounding areas through growth to revitalise town cores and through phased, well designed and integrated expansions to the town"*.

3.13 Naas is identified as a 'Large Growth Town I' under the Regional Planning Guidelines and is located within the Hinterland area of the GDA as defined in the RPGs. 'Large Growth Towns I' are defined as key destinations and economically active towns supporting surrounding areas, located on Multi Modal Corridors in the Metropolitan Hinterland.

3.14 Naas is located on a multi-modal transport corridor and the M7 economic corridor. The town is served by the national road network and high frequency, train and bus-based public transport infrastructure.

3.15 The RPGs state that Large Growth Towns will accommodate significant new investment in transport, in economic and commercial activity, and in housing. These towns act as important self-sustaining regional economic drivers for the GDA, capitalising on their international connectivity and high-quality connections to Dublin City Centre, whilst also supporting and servicing a wider local economy, and for some this extends beyond the GDA into surrounding Regions.

3.16 The Regional Planning Guidelines note the need to address the commuting patterns and levels of employment in hinterland towns such as Naas. The RPGs state:

"While there have been strong efforts and a strong number of major successes over the past few years in bringing new employment opportunities to the hinterland towns, it has not matched the scale of population and housing growth experienced in these locations; increasing commuting patterns. The continuing need to address this situation within a radically changed global and local economic outlook will create further challenges for this area during the lifetime of the new RPGs"

3.17 Strategic Policy EP2 of the RPGs is *"To seek sustainable economic growth across the GDA, by the promotion of identified core economic areas across the GDA in both the*

Dublin and Mid-East Regions to facilitate new employment opportunities for existing populations and seek to reduce the volume of unsustainable long-distance commuting”.

Transport Strategy for the Greater Dublin Area 2016 - 2035

- 3.18 In April 2016 the Transport Strategy for the Greater Dublin Area was adopted by the Minister for Transport. The Strategy builds on the work undertaken as part of the Draft Greater Dublin Area Draft Transport Strategy 2011 – 2030 and provides transport planning policy to guide development in the GDA over this 19-year period.
- 3.19 The Strategy divides the GDA into a number of ‘corridors’, connecting urban centres within the GDA to Dublin City Centre. Naas is located in Corridor D, a key economic and transport corridor in the GDA.
- 3.20 A key tenet of the Transport Strategy is that transportation and landuse planning should be integrated in order to place uses with appropriate mobility requirements in the right locations. The environs of Naas are ideally suited for space extensive employment use due to the road transport needs of such uses and the accessibility of the site to a major motorway.

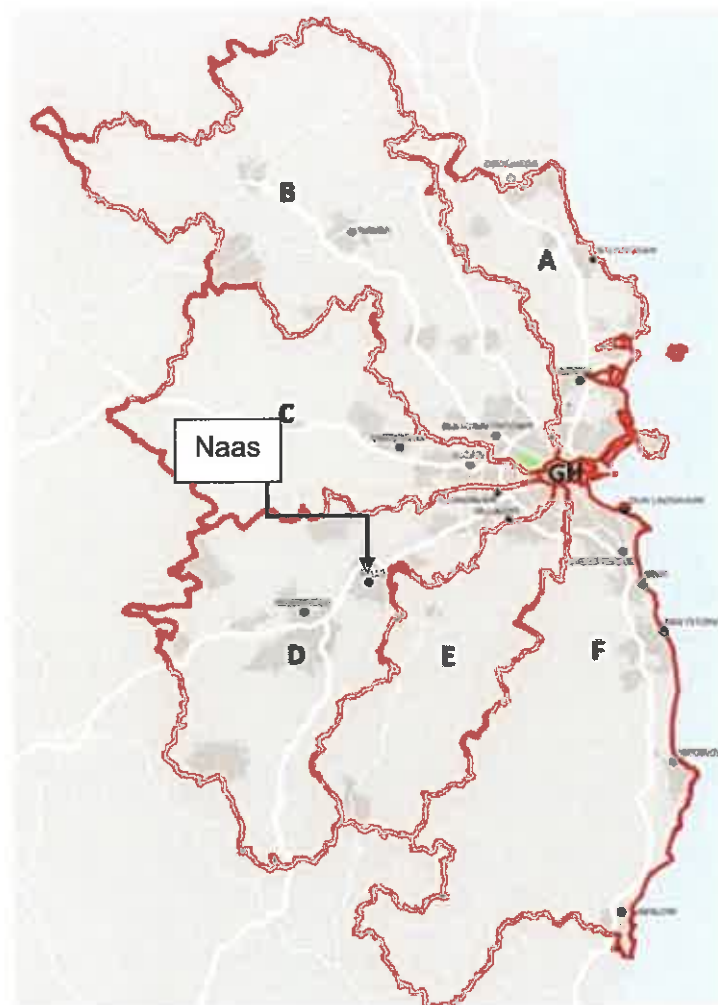


Figure 2: The Radial Corridors of the GDA (source: Transport Strategy for the Greater Dublin Area 2016 – 2035)

4.0 **GROUND'S OF SUBMISSION**

Relocation of Space Extensive Employment Uses

- 4.0 As set out above, the Draft NPF targets the relocation of space extensive, less intensive employment uses from existing built up areas as one of the key growth enablers for Dublin City. This will free up valuable and centrally located brownfield sites for more intensive residential and mixed-use development.
- 4.1 Space extensive uses, such as logistics, distribution, warehousing and light industrial uses are considered to be better suited to locations outside of Dublin's M50 ring road and outside the existing built up area of the city. The NPF also targets the identification of competitively priced development lands for employment uses, the location of which should be based on the nature of the relevant employment use type (i.e. whether the employment use is space extensive, its requirements for infrastructure and services etc.).
- 4.2 It should be noted that Dublin City Council are currently undertaking a targeted review of all Z6 (employment) zoned lands within their functional area, with a view to re-designating areas of Z6 zoned lands, particularly those underutilised lands containing lower order warehousing type uses, to accommodate compact residential and mixed use development.
- 4.3 Such a relocation of space extensive uses will free up valuable brownfield sites which can be more efficiently and beneficially utilised for the accommodation of high density residential, employment or mixed-use development within the built-up area of the city.
- 4.4 The RSES Issues Paper poses the following question:
- "What policy response is required to deal with the adverse effects of the outwards sprawl of the city region?"*
- 4.5 The freeing up of underutilised brownfield sites within the city will play a significant role in the achievement of sustainable, compact growth and the avoidance of sprawl within the EMRA over the operational period of the NPF and the RSES, with the NPF targeting 40% of future housing development within the existing built up areas of Ireland's cities.
- 4.6 It is respectfully submitted that the clear statement of intent within the Draft NPF, for the relocation of space extensive employment uses to more appropriate locations outside of the M50 ring and outside of the built-up area of Dublin, should be reflected within the Draft (and subsequently the final) Regional Spatial and Economic Strategy for the Eastern and Midlands Regional Assembly.
- 4.7 One of the core functions of the Regional Spatial and Economic Strategy is to give effect to the National Planning Framework and implement the policies and objectives contained therein. The RSES should therefore implement the objectives of the Draft NPF as they relate to the relocation of space extensive uses. The Regional and Local authorities are also required (per the Draft NPF) to identify and quantify lands for future employment uses.
- 4.8 It is submitted that this may be achieved in part via the inclusion of an objective or policy, specifically targeting the relocation of space extensive employment uses within the built-up area of Dublin to more appropriate greenfield locations outside of the M50 ring.
- 4.9 Having regard to the requirements of space extensive employment uses (specifically the availability of appropriate sites, quality transport infrastructure, and a proximate

workforce), it is submitted in detail below that the town of Naas (and more specifically our client's lands at Newhall) are ideally suited to accommodate the development and relocation of such uses.

Naas – A Suitable Location for Targeted, Sustainable Employment Growth

- 4.10 As set out above, the relocation of space extensive employment uses from the built-up area of Dublin to suitable greenfield sites is considered a key enabler for the city's sustainable and compact growth. While this relocation (to be achieved through active land management or otherwise) will free up valuable brownfield sites within the city's built-up area, the corollary is that lands will concurrently be required to accommodate these employment uses.
- 4.11 It is therefore considered that in order to proceed with this approach to the freeing up of land within the city in an orderly and plan-led manner, the Regional Spatial and Economic Strategy for the Eastern and Midlands Regional Assembly must provide direction as to the appropriate locations for these employment uses which are to be relocated.
- 4.12 It is respectfully submitted that Naas (and as elaborated further below, particularly the greenfield lands north of the new Newhall interchange on the M7 Corridor) is ideally suited as a location for employment growth of the sort set out above. The town boasts a population of over 21,000 (per the 2016 census) and is highly accessible having regard to its location on the national road network, with regular bus and rail services also serving the town. Sallins, located immediately to the north of Naas town on the northern side of the M7, provides further population of over 5,800 (as of the 2016 census) contributing to the available labour force in the immediate vicinity. Johnstown, immediately to the east of Naas, also had a population of over 1,000 at the time of the 2016 census.
- 4.13 The workforce in Naas is comparatively well educated, with over 42% holding a third level qualification. Just 3% of the workforce in the town is unskilled (per data from Census 2016).
- 4.14 Naas is a large town located in the hinterland of the Greater Dublin Area and is highly accessible having regard to its location on the M7 Corridor on the national road network and on a major arterial rail route. This constitutes one of the town's key comparative advantages, as such a high level of accessibility is a downward modifier on the cost of transporting raw materials and distributing goods. The location of the town in the hinterland of Dublin but with easy access to the capital makes Naas well suited to the provision of space extensive / lower intensity employment uses, which require ease of access to high quality road connections, but which are better suited to locations outside of denser, higher intensity urban areas.
- 4.15 The suitability of Naas to accommodate logistics, warehousing and light industrial type uses is exemplified and proven by the location of significant existing employment uses in the environs of the town, for example the Aldi distribution centre, the M7 Business Park, Millennium Park, and Naas Industrial Estate. These existing employment uses have capitalised on excellent levels of accessibility, proximity to a large and skilled workforce, and the availability of serviced lands which are topographically suited to employment generating uses.
- 4.16 The immediate environs of the town include significant areas of undeveloped greenfield lands which are highly accessible, proximate to a significant available workforce and topographically suited to the development of employment generating uses. The town has a notable comparative advantage in terms of accessibility and is located within an area which would benefit from significant employment growth.

- 4.17 Our client, on whose behalf this submission is made, is the owner of a significant landholding located in close proximity to the M7 Newhall interchange (please see Appendix 1 for details of our client's landholding). These lands benefit from an excellent level of accessibility and access to services including water, electricity and wastewater services.
- 4.18 It is respectfully submitted that economic growth comprising industrial and warehousing type uses, and other space extensive, less intensive employment uses should be focused on the area surrounding the (currently under reconstruction) Newhall interchange. This area of the towns environs is ideally suited to such development, and could accommodate a significant level of investment, fostering economic development and job creation for the town, with positive externalities accruing from the agglomeration of space extensive employment uses at this location.
- 4.19 The directing of such uses to this area would foster the achievement of economies of scale and agglomeration for employers locating there, while impacting positively on the prosperity of Naas and surrounding areas and precipitating a multiplier effect in terms of local expenditure and economic development.
- 4.20 Our client's lands were partially zoned under the previous Kildare CDP for Industrial / Warehousing use; however, this zoning objective was not carried forward into the current 2017-2023 Plan due to the intended inclusion of the environs of Naas within the new 2018 Naas LAP. The Draft Naas LAP is currently under preparation.
- 4.21 As set out hereafter in Appendix 1, our clients lands constitute serviced, greenfield lands which are ideally suited to the development of space extensive employment uses due to their high level of accessibility, proximity to a significant labour force and the topography of the lands, all of which are conducive to the development of employment uses of that nature.

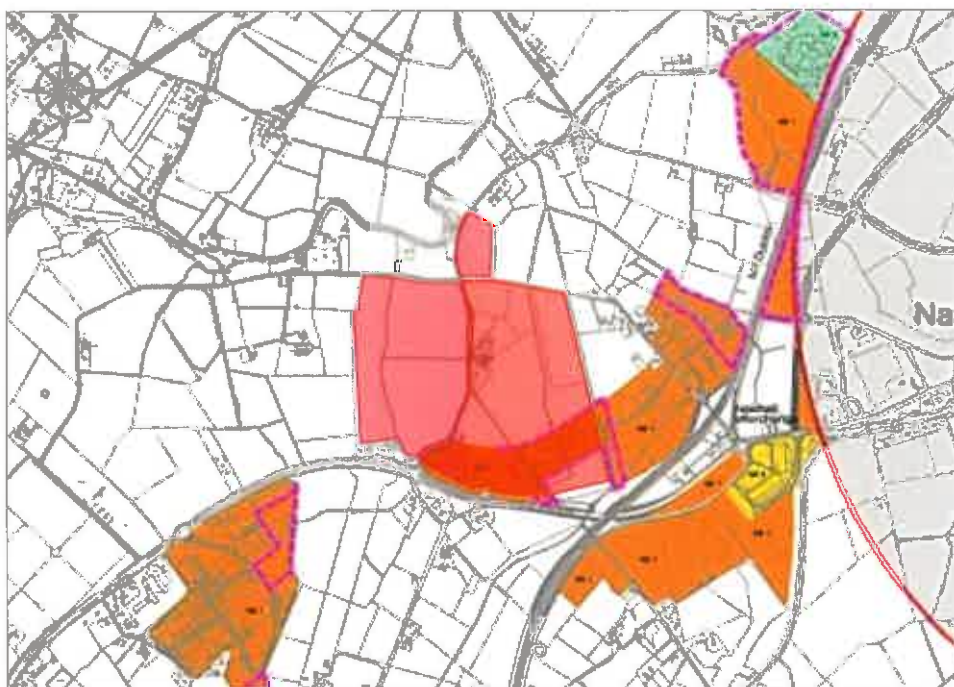


Figure 3: Former zoning of the subject lands in the CDP 2011-2017 Naas Environs (West) zoning map

4.22 The Issues Paper also puts forward the following key question:

“How do we ensure the most effective use of infrastructure and resources?”

4.23 It is submitted that the location of additional space extensive employment uses at Naas and its environs would capitalise on the comparative locational advantages of the town, along with the existing infrastructure serving the town - in particular high-quality transport infrastructure. As set out above, the relocation of these uses from the built-up area of Dublin will also allow for more efficient use of resources (land within the city) to accommodate more appropriate and intensive forms of development.

4.24 The Issues Paper for the EMRA RSES notes the current imbalance between the size of the workforce and quantity of local employment within the Eastern SPA. The deficit of 113,000 jobs when compared to the number of local workers is considered to be a key factor influencing the commuting patterns within the region and the modal choice amongst workers. The Issues Paper poses the following key question:

“How can we encourage better alignment between population growth, location of residential development and employment?”

4.25 It is submitted that the relocation of space extensive employment uses from lands in Dublin City to targeted areas outside of the M50 ring will have a dual benefit, in that land will be freed up within the built-up area of Dublin for more intensive and appropriate employment and residential uses, while concurrently providing a source of local employment in areas which currently suffer from a lack of employment to offset past and future population and housing growth, thereby encouraging more sustainable commuting patterns and improving quality of life.

4.26 The relocation of existing space extensive employment uses, and the accommodation of new employment generating uses will require the provision of adequate greenfield sites at appropriate locations, such as the environs of Naas, and in particular the lands proximate to the new Newhall interchange.

4.27 Over 26% of workers and the school-going population of Naas departed for work / school before 7am at the time of census 2016, indicating a high level of long-distance commuting. Over 66% of the population at work / education from Naas travelled by private means, one of the highest percentages of key settlements in the EMRA region.

4.28 Naas is strategically located within the Eastern SPA area to address the trend of long distance commuting via the provision of additional employment, thereby playing a role in addressing the imbalance between the population of the area and employment provision therein.

4.29 It is respectfully submitted that a specific objective should be included within the EMRA Regional Spatial and Economic Strategy, recognising the potential of Naas to accommodate employment growth, and particularly space extensive, less intensive employment uses, which are targeted for relocation from the built-up area of Dublin City.

5.0 CONCLUSIONS

5.0 We would be grateful if this submission could be given careful consideration during the preparation of the Draft RSES for the Eastern and Midlands Regional Authority.

5.1 This submission has considered the relevant questions and issues raised within the pre-draft Issues Paper for the EMRA RSES in the context of our client's lands and has provided a review of the relevant existing and emerging planning policy context and has set out in detail grounds of submission which may be summarised as follows:

- It is respectfully submitted that the RSES should include policies and objectives to give effect to the Draft NPF, in targeting the relocation of space extensive, less intensive employment uses to appropriate greenfield locations outside of the M50 ring and the built-up area of Dublin City.
- It is submitted that Naas and its environs present an ideal opportunity for the location of space extensive employment uses having regard to highly accessible location of the town on a multi-modal transport corridor, the availability of appropriate greenfield land, and the existing labour force within the town and surrounding areas.
- The development of additional employment in locations such as the lands to the north of the Newhall interchange would serve to improve the population / employment ratio in the Eastern SPA of the EMRA region, thereby improving quality of life, reducing strain on infrastructure, and reducing long-distance commuting.
- It is therefore further submitted that Naas Environs, and in particular locations proximate to the M7 corridor, should be recognised as a potential location for space extensive employment uses in sectors which require larger sites served by high quality road infrastructure.

5.2 We look forward to a favourable response from the Authority in relation to the above and if you require any further information please do not hesitate to contact us.

Yours Faithfully,


John Spain Associates

APPENDIX 1: CRYLOCK DEVELOPMENTS' LANDHOLDING AT NAAS ENVIRONS

Location and Context of the Subject Lands

Our client's lands are located approximately 2 kilometres to the west of Naas Town Centre and adjacent to the Newhall Junction of the M7 (see Figure A1 below).

It is respectfully submitted that the close proximity of the subject lands to the national motorway network, other services infrastructure and the County Town of Naas, makes these lands highly suitable for accommodating space extensive employment uses. The lands have access to a 750mm diameter foul sewer along the Rathangan Road, potable water and electricity. The lands comprise of approximately 110 hectares.



Figure A1: Site Location outlined in red

The subject lands are currently in agricultural use, and are substantially flat, with very little gradient. They are therefore well suited topographically for the development of space extensive employment uses.





Figures A2 and A3: Views of the subject lands from the roadway facing west of the subject lands and from the L2030 facing south

As illustrated in Figure A1, the subject lands occupy a substantial landholding in a strategic location on the edge of the existing built up area of the town and to the west of the M7 Motorway and Newhall Interchange, which is undergoing a substantial upgrade in 2018. The lands also offer significant frontage onto the R445 in the area at Newhall Crossroads and the local roads running north-south and east – west serving the lands. The lands are located to the west of the Easthill and M7 Business Parks and in close proximity to the Ladytown Business Park, Toughers Industrial Estate, Newhall Retail Park and the Aldi Naas Regional Distribution Centre. There are also a number of other employment generating uses in the area and undeveloped lands surrounding the Newhall Interchange. Newbridge is located approximately 6.5 kilometres to the south west of the subject lands.

The subject lands are considered to occupy a strategic location within County Kildare, being located on the edge of the existing Naas built up area, on the M7 Economic / Transport Corridor, and offer a suitable location for the future development of Industrial / Warehousing / General Employment uses. There is significant demand at present within the Greater Dublin Area (GDA) for industrial / warehouse / logistic floorspace and sites due to the continuing economic growth seen nationwide (and particularly in the GDA) over the past three years, with a clear preference for premises and sites well served by major road and motorway infrastructure. It is imperative for the successful delivery of economic growth and employment development that such lands are made available and zoned appropriately.

The development of significant quantities of additional Industrial/ Warehousing floorspace is of the utmost importance in supporting the continued recovery of both the local and wider economy. Such developments are necessary for the accommodation and success of home-grown enterprise and for attracting foreign direct investment. The appropriate zoning of these lands is important to ensure the availability of the necessary quantum of floorspace to accommodate new business in the County.

The (re)location of less intensive employment uses (including industrial and warehousing uses) beyond Dublin's M50, is provided for within the Draft National Planning Framework. The subject lands are well suited to accommodate such uses in close proximity to a population centre and on lands which are highly accessible due to their location on the edge of the built-up area of Naas, and served by the M7 motorway.

The subject lands are due to see the introduction of major infrastructural upgrades nearby in the near future with the upgrading of the M7 Naas to Newbridge Interchange and associated works to the immediate south of the lands.

The clustering of Industrial / Warehousing / General Employment related uses, which are not highly intensive uses in respect to traffic generation, on the edge of existing urban areas and with

convenient access to the national motorway network is increasingly common throughout the country and particularly in the GDA. It is respectfully submitted the lands which are the subject of this submission are ideally suited to the uses put forward.

Planning History of the Subject Lands

A planning search was undertaken in respect of the subject lands using the Kildare County Council online planning search tool. The relevant planning history of the subject lands is detailed below.

Register Reference 06/707

Permission was granted by Kildare County Council on the 3rd of September 2007 for development on the subject lands comprising a business park / industrial estate consisting of approximately 11 no. sites for further industrial development, construction of 1 manufacturing unit on one of these sites with the remaining sites to be subject to future planning permission.

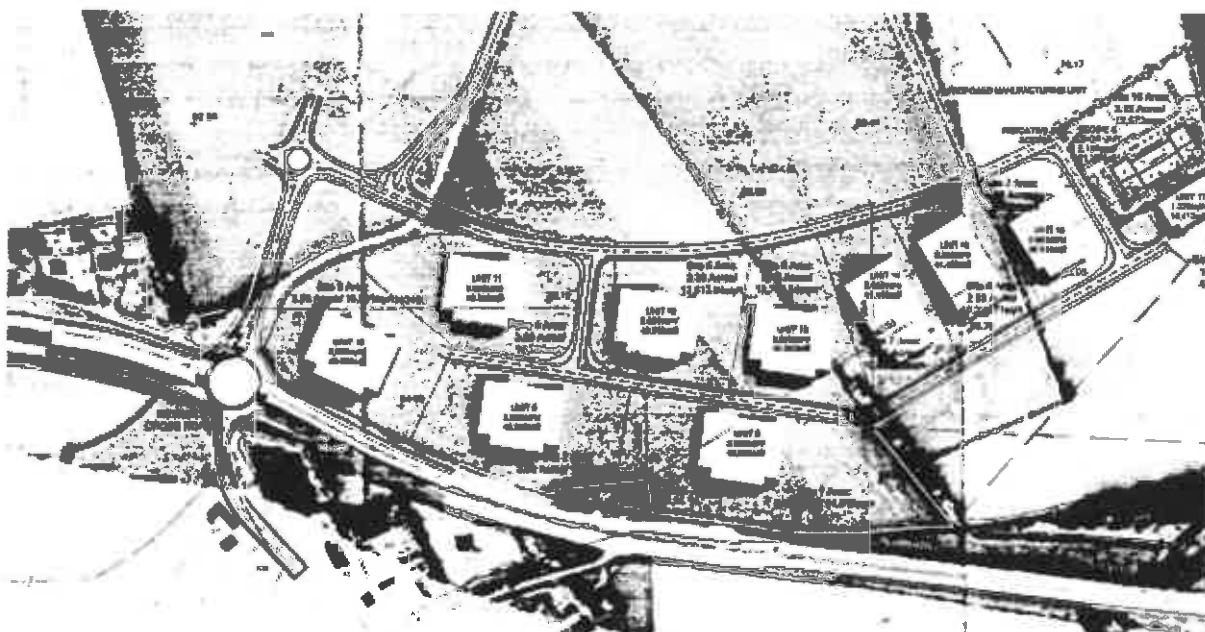


Figure A4: Extract from site layout drawing of Reg. Ref. 06/707

Register Reference 12/106

Kildare County Council granted an extension of duration of planning permission Reg. Ref.: 06/707 on the 10th of April 2012. The extended permission expired on the 1st of September 2017.