

**From:** seamie moore <[REDACTED]>  
**Sent:** Tuesday 22 January 2019 23:11  
**To:** RSES  
**Subject:** Submission on EMRA Draft RS & ES

I wish to make the following observations and requests based on a keen familiarity with the towns/cities in Ireland, their development, the development of County Kildare, the town of Naas, a 25 year experience in the drawing together of CDPs and LDPs of Naas and other towns as a member of the former Naas Town Council and Kildare County Council..

I am aware of the compilation of the NDP and NPF and the position of responsibility held by EMRA to seek, make recommendations or arrange non-major changes and allow some flexibility within our Region where a review would show beneficial results to the overall plan.

Submission.

1A. Region and sub-Regions-----No issues.It is as it is! Dublin commands the high ground of flagship recognition and supports to continue in that position.

1B. Regional Growth Data; Observation; House prices and availability in DMA force new Dublin and Kildare families to travel further away to other counties and become commuters.House prices in Dublin average €350K, in Kildare €250K and in Laois €150K. This is caused by too little zonings in Dublin & Kildare and allowing developers to pursue a higher than usual market price due to a restrictive land market. This is unfair to young couples and young commuters.. Naas had no 'Ghost Estates' and some builders were able to continue to build and sell houses during the recession in Naas. More lands should be zoned Residential in Dublin & Kildare. Local Authorities in Dublin and Kildare are responsible for artificially high prices. This is due to the pursuit of wrong and restrictive policies in Dublin and Kildare! Lack of zoning is removing 'affordability' from houses, helps create serious financial stress on young families and forces them to live further away in rural Ireland from their successful jobs in Dublin. Key towns, like Naas should be allowed a 'further 50% population ceiling' on its target growth for a single fixed six year period to allow phased constructions and conditions where residential land zonings will be lost if constructions are not commenced within the period.

2. Vision; Accessibility; Even at present (2019) there is no ease of travel for M7 commuters to Dublin for the last 30k into the city. The M7 is daily over stretched with commuters who travel from as far away as 150 kilometres and all convene together for the last 30 kilometres at/around the same time. This traffic must be substantially removed by Park & Ride facilities near Naas or a more serious and immediate plan must bring forward the electrification use of the Dublin/Cork rail to Naas/Sallins and Newbridge. There is very little proposed major investment by NTA over the period to 2031 to remove road congestion and improve connectivity over the last 30 kilometres of the M7/N7 into Dublin. A Park & Ride some where on the west of M7 and near any of the four interchanges near Naas would relieve that congestion and remove many multiple thousands of vehicles from entering Dublin. Every year Dublin Corporation eliminates traffic from City Routes and will eventually bring in a 'banning' of non-essential vehicles from rural Ireland. The M7 is such a major contributor to Dublin traffic. It is amazing that elimination or easing of such traffic has not received detailed attention in this plan. A decision to accept a Southern Axis Economic Corridor to Naas/Newbridge would highlight the benefits of a Park & Ride, Electrification of the Dublin/Cork Rail Line or a Luas type transportation system. ~~EMRA should reconsider the~~ need for this Economic Corridor and improved Connectivity along this M7/N7 Route.

Growth Strategy; The recognising and development of Economic Growth Corrdors is well founded but the vision should be increased to recognise and include phased development of a Coastal Corridor to Bray, Wicklow and Rosslare. This will be imperative for Irish exports in view of the now clear Brexit and the possible uneconomic use of the British Land Corridor to Europe.Maynooth/Dunboyne Corridor covers the existing and developing Dublin Metropolitan expansion westwards. There is an obvious omission on not accepting that a Southern Economic

Corridor already substantially exists along the M7 to Naas/Newbridge for the same reasons as any DMA site, nearness, connectivity and accessibility to Dublin City, Dublin Port and Airport and is hugely advantageous to the NDP.

This recognition should be re-examined in the light of the time frame objectives to 2031/2040 and its exclusion from state recognition in this NDP/NPF plans and the consequent omission from the necessary strategic supports needed to keep the corridor active and competitive on a national basis during that period. The Regional Authority should be able to recognise and make that case, based on the 'real-time' developments and investments that have continued to take place in both Naas and Newbridge. In recent years over €300 million of public funding in infrastructure and services has geared Naas Town towards a previously recommended growth inclusion as a Regional Growth Town in that economic/population corridor out from Dublin. Both Naas and Newbridge have sound asset based supports, easily identified, to be selected as the Southern Axis Corridor from Dublin to mid Kildare. On the basis of Kildare's 'off-take' of Dublin population over the past twenty years, the 'metropolitan' factor presently exists in mid-Kildare but it must receive your reference of 'catch-up' economic investment to become more 'self-sustaining'. This 'Planning IOU' should not be ignored by our own EMRA.

**Compact Growth;** The reference to 30% of residential developments to be built on lands within the built up areas of towns, should be flexible to cater for towns that DO NOT HAVE that capacity available because of existing encircling estates close in to the town and urban structures that will remain as the fabric of the town. Due to legal/CPOs/Court delays, the stipulation to develop such sites should be zone highlighted within the first six years 2019/2025 but phased in over 12 years to 2031. The population growth figures for a Key Town should then only have limitation considerations for the second phase of six years, ending 2031. The previous LAs in Naas have made all of the previous LAPs within a unique legal boundary and compact circle an 1.5 mile radius of Naas Town Hall. The 'lost' populations to town centre Naas is due to families setting/letting and leasing their shops whilst they retired to residential estates. Conceivably, in the light of new consumer trends, the focus of this plan should give serious considerations to returning present retail/shop areas to family homes as they were in the 1950s.

**Settlement Strategy;** The reference to a Metropolitan North Kildare is an undeniable expansion of Metropolitan Dublin and as such the allocated population growth should come from the allocated DMA of 250,000 and allow the allocated North Kildare population growth to be re-spread to other Kildare towns.

**Third Level Education Centres;** The strategy to recognise and allocate economic and population growth to Key Towns or Major Growth Towns on the basis of having their own third level University or IoTs should be relaxed to allow for the consideration to read 'towns that have connectivity to third level educational services'. This would allow a meaningful and fair consideration to Naas with its easy connectivity to Maynooth, Tallaght, Carlow and the multiples of third levels in Dublin, each one, no more than 30 minutes away, in connectivity. This would then allow a more positive 'asset consideration' for Settlement Growth of the Key Town of Naas.

**Regeneration and Development Fund ;** Access to these funds should be made available to Kildare CC to facilitate

- a) The development of a 'Green Lung' site and create a 'Stephen's Green' type Public Park in its own Oldtown Woodland Gardens for Town Centre Naas.
- b) Purchase lands for Community purposes to allocate or develop recreational/football grounds for the many under-provided clubs/groups that have evolved over past twenty years in Naas.
- c) The acquisition and development of park and ride land sites around Naas to relieve congestion within the Town Centre, for Sallins/Naas Rail commuters and for M7/Dublin City relief.

Many thanks.

Seamie Moore Cllr. Kildare CC & Naas Municipal District

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