

Laure Antoniotti

From: Suzanne Doyle <[REDACTED]>
Sent: Wednesday 23 January 2019 04:50
To: RSES
Cc: Michael Kenny
Subject: Submission on Draft RSES

To whom it may concern

I wish to make the following observations and suggestions on the draft Regional Spatial Economic Strategy for the East Midlands Regional Area, that might be considered in preparation of advancing project.

Regards

Suzanne Doyle
Member of Kildare County Councillor

1. Suspend Adoption of RSES:

That work on RSES be suspended pending outcome of BREXIT negotiations. In light of the significance being placed on the development of a Dublin Belfast corridor and the specific growth objectives outlined for Drogheda and Dundalk, it might be judicious to wait outcome of BREXIT negotiations in order that implications for this strategy can be assessed. Should a hard border materialise, the objectives laid out in this plan, supported by significant growth targets for Louth, may not be tenable or indeed optimal.

2. Action Housing Supply: (5.7)

Given the importance of housing delivery, across the full supply spectrum, as both a social and commercial imperative, more specific mechanisms of delivery need to be outlined in plan. Much of what is being proposed demonstrates no clear means for delivery.

Sustainable living through delivery of high density housing, brown field site development, while a laudable objective, it is clear that obstacles exist in realising these goals at an affordable level.

Details need to be teased out on meeting these challenges. Legislative powers and regulatory reform are necessary to make this a reality, simply stating them as objectives is a meaningless attempt without supporting the statement with actionable means.

The proposals within the RSES risk the potential of limiting supply of land for development which may compound one of the most pressing social and economic challenges that face the region. As it stands the RSES is seeking to implement policies that may simply increase house inflation and limit supply.

The RSES needs to demonstrate models of delivery that achieve what is outlined, particularly in the delivery of high quality densities. Successful delivery of density should result in housing of choice not necessity and to achieve this will require significant height to facilitate optimum private living space that can command demand and in turn revolutionize Irish dwelling patterns.

Such examples should be mandatory in all settlements identified for growth in excess of 20,000 population, where appropriate sites are zoned specifically for this type of development.

Appropriate sites should deliver on access to transport, recreation and amenity and convenience to town centre, height achieved should have capacity to deliver underground car parking, high levels of Recreation and Amenity on site and mixed development that will be appealing to a range of house types, from downsizers (requiring generous storage and living space to single occupancy units), developers might be encouraged to deliver large blank space where final fix and partition may be developed at occupiers discretion, hence attracting a large range of potential users.

Given the costs associated with achieving height, apartment living needs to be developed into the housing of choice for high income earners who can afford to support the associated costs and therefore apartment size, design and scale need to be ambitious and innovative.

Models of mixed use development in areas **of high density commercial development (docklands/ IFSC etc)** where both residential and commercial space needs to be encouraged and in some cases become mandatory. The opportunities to leverage delivery of high quality apartment development as part of lucrative office development could offset some of the associated costs of achieving height required to deliver the quality desired.

3. Quality of Life

Have concerns that the focus being given to the delivery of high density housing may result in mono socio economic demographics. Previous experience has demonstrated that mono communities can lead to social polarisation, entrenched vulnerabilities and deprivation and ultimately social instability at times of crisis. It is important to recognise the need for balance in the delivery of housing to ensure mixed development is delivered in the catchment area of all schools, to that end all **PART V delivery should be delivered within the school catchment area of original development from which it emanates.** Equally it is important to recognise areas of social deprivation and seek to rebalance communities through the delivery of more affluent housing. Beyond the social integration, the demographics of age need to be catered for and to this end mechanisms that can facilitate downsizing within communities should be facilitated and incentivized.

Access to quality childcare is correctly identified within the plan as an exclusion issue, an additional policy objective within the RPO 9.15 objectives should recommend the **co location of childcare with other relevant and complimentary services that will enable both monetary and time efficiencies,** ie schools, train stations, residential homes. To facilitate delivery of this objective may require a **review of our zoning matrix to include a special designation for social infrastructure to include Nursing Homes and Crèches, commercial activities that do not have the means to compete with other commercial uses for optimum sites but when properly located can have a positive impact on quality of life issues for community.**

While our focus is understandably on the delivery of social and affordable housing it is important that this doesn't result in an unintended consequence of mono social economic demographic and therefore, even though it may conflict with core principals, we should **accommodate certain levels of low density and even serviced site development within settlements** in an effort to ensure social integration and social stability.

Place making is referenced in 9.4 of Plan as a factor in improving quality of life. While the recommendation to invest in public realm plans is welcome, it will require policies that effectively counteract out of town development and consequently support the revitalization of our town centres. Strategies that address cost benefits to out of town centre development, strict adherence to sequential development of town centres, specific zoning for commercial activities that drive footfall in order to strengthen town core (eg multiples should be restricted to developing on specifically identified sites in recognition of their power to drive footfall and decimate town centres through relocation). Town centre development needs to be prioritised in recognition of its social value in solidifying and integrating communities. Activities of town centre development need to be reviewed in the context of revolution in retail patterns and policies that address this issue need to be developed.

4. Language (Section 9.6 & 9.9)

I note the reference to the Irish language but think the Plan fails to recognise the relevance of multiple languages within our society. A recommendation to recognise and facilitate the many languages of our pluralist society should be included and in the interest of social cohesion and integration, an objective to **support and promote the teaching of English (TEFL) to new members of our community should be included in plan.**

5. Transport:

The development of Rail network throughout Country should be a priority with the **Kildare Route Project identified as a key investment for region.** Rail Networks need to be recognised as a means of dispersing labour force in both directions, not just Dublin bound and welcome the recognition and support of this premise in plan.

Examine the Rail network to determine optimum location/ relocation of train stations, where modern train stations that facilitate necessary parking, appropriate co location activities can be provided. Funding for same could be offset through the intensive development of current sites which are normally centrally located.

Prioritise the development of settlements serviced by rail network to facilitate the reality of a flexible labour force and minimise the impact of inevitable employment changes that will take place throughout a persons career.

Prioritise the zoning of commercial and industrial sites in close proximity to railway stations and lines.

To alleviate congestion on key road networks include policy, **to facilitate the implementation of dual direction carriageways** where central lanes can be adapted to facilitate alternate direction traffic in line with peak demand. **Prioritise the development of a rail link to Dublin Airport that connects with both city centre and National grid.**

Amend following principle on page 145; 'Proposals for right of way extinguishment should **normally** only be considered where these do not result in more circuitous trips for local residents accessing public transport or local destinations'. This statement does not allow for exceptional cases where badly designed access and serious anti social behaviour is having a significant negative impact. The following should also be included, 'all development should be designed in a manner that facilitates optimum pedestrian permeability while having regard to mitigating potential adverse impacts.'

Query: Under principles for integration of land use and transport it is stated that 'All non residential development proposals should be subject to maximum parking standards' & 'In locations where the highest intensity of development occurs, an approach that caps car parking on an area-wide basis should be applied'. Are these contradictory statements?

While the statement requiring LPT (pg 146) for specific settlements does not preclude other towns, experience has taught me that to achieve necessary funding to support those not identified will be virtually impossible, therefore I think it would be more appropriate to replace with, '**LPT will be mandatory for every town with a train station and those identified for growth in excess of 10,000 population and that the LPT be reviewed and updated at intervals of 5,000 population growth.**' This is to ensure sustainable growth patterns are achieved and is particularly important in towns with train stations that act as a gateway to large volumes of commuter traffic competing for use at peak times. The function of schools, crèches and places of employment can be impacted greatly in such cases and an LPT to manage this movement is essential.

All development should be access proofed and National schemes to address deficits in this regard should be actively supported and promoted.

6. Industry and Employment

Commend comprehensive coverage of this topic, however subject to the final outcome of BREXIT and potential for hard border, plan relies too heavily on North South economic links, alternate strategies need to be investigated and planned in event of hard border.

Clearly our greatest economic asset is workforce and to insulate this asset we need to prioritise investment in education and compete effectively with International third level Universities. Recognition of this priority and a means to support the realisation of same is a key risk factor for region.

7.Environment & Energy

Page 124, to amend and include Kildare town in table under heading of Medieval, Historic & Walled Towns, in both medieval and walled categories. To include the Curragh Plains in appropriate category Heritage sites/ National Parks.

8. Settlement Strategy

Have concerns that identified settlements within the commuter belt are not prioritised having regard to principle of prioritising on transport links. Towns with rail linkages should be designated for growth in preference to towns that do not have this essential asset, in the interest of sustainable development. Recognising the advantages for economic resilience in the delivery a mobile flexible labour force.

That NPF population projections be reviewed on foot of issues raised in consideration of RSES.

That Newbridge and Naas be identified and planned as one settlement, recognising the potential efficiencies in planning the interrelationships of both towns and that a single LAP be prepared to encompass both towns in establishing a coherent settlement that can be a regional economic driver to counteract pressures of commuter culture evident daily on the M7.

9. Recreation and Amenity:

Plan should include a policy to develop a matrix that outlines optimal levels and hierarchy of recreation and amenity space as a ratio of population from which to benchmark settlements. This should be easily accessible and used as a means of measuring quality of living standards within settlements. **Basic levels of R&A should be set and**

given the same status of critical infrastructure that would be conditioned for delivery in conjunction with all development both commercial and residential. Include in recreation and amenity matrix levels of tree planting and standards of public realm (seating, lighting, safe public space, town Sq/Plaza etc). A requirement to stress test every LAP on ratios of Residential : Recreation & Amenity: Commercial: Industrial: Education & Institutional, in order to identify imbalances in the optimum equilibrium for sustainable development.

10. Existing Infrastructure Investment

While the plan clearly outlines that funding will follow the plan, I see no evidence where we are putting in place measures that ensure designation of settlements within the review of CDP's will require us to have regard to existing infrastructure and recent investments. I understand from information seminars that each County will exercise discretion on the distribution of apportioned growth. We in Kildare are already seeing the progression of Naas, Leixlip LAP's in addition to the prescribed designation of Maynooth for large proportion of growth. This leaves very little wriggle room for a County under immense development pressure, with towns such as Newbridge, Celbridge, Athy, Kildare overlooked.

At the risk of being considered parochial, I would ask that RSES examine a town like Kildare within the County under the current draft, given the priority of growth already apportioned to towns advancing LAP's prior to adoption and Maynooth's designation, we may well have to consider down zoning/phasing. Kildare has had a lacuna on development for over 10 years while awaiting delivery of very expensive critical infrastructure, in addition to delivery of schools with headroom and now despite having an excellent transport network (main rail to Dublin, Limerick, Cork, Waterford, Galway) and the capacity to deliver **affordable housing**, towns such as Leixlip & Naas are completing LAPs in advance of CDP reviews post RSES, which will inevitably result in restrictions of growth in towns that may be better equipped to deliver sustainable affordable growth. At the very least this compromises the opportunities for review of CDP, where much of the growth is already apportioned.

Given the delicate balance of water supply for region with no definite alternate resource to augment supply, **RSES should seek to future proof development and protect water resource by seeking to prioritise growth in relevant/suitable settlements that do not rely on Liffey.** The Barrow abstraction supply in County Kildare supports such towns and this should be a factor when considering the sustainable growth of region, a cost benefit analysis should be conducted in considering the optimal returns on public investment and use of finite resources.

11. Funding Structures:

To sustain quality of life environment for residents, new funding structures for delivery of services and Local government will have to be identified that seek to attach costs of supporting labour force with the generation of wealth to which it contributes. In the heavy commuter belts surrounding Dublin, neighbouring Counties are effectively subventing the cost of supporting revenue generators in the capital while the capital is failing to deliver suitable housing for this labour force in preference to the commercial development of high rate yielding sites. In addition to LPT, a mechanism to ring fence and deliver a certain proportion of rates revenue that will be applied to the County from which the worker is resident in recognition of the costs associated with supporting the vital element of Labour in the commercial equation.

A measure of public investment efficiency should be calculated to determine best use of expenditure, this needs to be a sophisticated mechanism where the potential to leverage previous investment is also captured and should be an ongoing assessment, calibrating all costs and revenues (both monetary and qualitative ie quality of living achieved) with a view to ensuring efficiency , environmental sustainability and equity in distribution of expenditure.

Simon Musial

From: Suzanne Doyle <[REDACTED]@emra.ie>
Sent: 24 January 2019 19:54
To: RSES
Subject: Re: Submission on Draft RSES

Jim

Thank you for receipt, I made a very silly typo error when referring to TMP, it appears to read LPT, could this be amended please to make some sense of the point.

Apologies, late hour and a computer with a mind of it's own, that's what you get for not proof reading!

Regards

Suzanne Doyle

On Thu, Jan 24, 2019 at 7:09 PM RSES <rses@emra.ie> wrote:

Dear Councillor Doyle,

I acknowledge receipt of your submission in the above regard, reference number: 0160

All submissions will be given consideration before formulating the final Regional Spatial and Economic Strategy which forms the next phase of the process.

Please note that public submissions may be published on our website and are subject to Freedom of Information legislation.

To avoid duplication please do not send a hard copy of this submission.

All data will be stored in accordance with the Data Protection Act 2018 and the General Data Protection Regulation (GDPR) 2016.

Thank you for your contribution.

Regards,

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