

Your Ref:

Our Ref:

23/01/2019

Mr. Jim Conway.  
Director,  
Eastern and Midland Regional Assembly,  
Ballymun Civic Centre,  
Main Street,  
Ballymun,  
Dublin 9.  
D09 C8P5.

Re: Draft Regional Spatial and Economic Strategy for the Eastern and Midland Region.

Dear Mr. Conway,

Attached is Kildare County Council's submission in response to the public consultation regarding the Draft Regional Spatial and Economic Strategy for the Eastern and Midland Region for your attention.

I would be grateful for your acknowledgement of receipt of our submitted documentation.

Yours faithfully,

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Peter Minnock  
Director of Services  
Planning and Strategic Development.



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# Draft Regional Spatial & Economic Strategy

## Eastern & Midland Regional Assembly

Submission of Kildare County Council



Planning and Strategic Development Department

23<sup>rd</sup> January 2019

## **1.0 INTRODUCTION**

This submission sets out issues of principal concern for Kildare County Council in respect of the draft Regional Spatial and Economic Strategy (RSES) published in November 2018.

While there are many elements of the draft RSES which are welcome, Kildare County Council is concerned with the lack of correlation of the growth strategy with the economic strategy – a point made in our previous submissions. In this regard, the apparent economic policy gap and lack of detail for the Eastern SPA, Key Towns and other towns across the hierarchical growth strategy are particularly relevant. In several places the draft does not provide a guide for relevant actors and agencies but merely lists the current policies and activities of the relevant actors.

The selection of Key Towns in the settlement hierarchy is based on an evidence-based approach, yet this evidence is not made available. The evidence behind such critical decisions such as designating Key Towns should be made available.

Related to this is the failure to designate Newbridge as a key town – the fifth largest town in the Eastern SPA in the Eastern Strategic Planning Area (SPA). Previous submissions have consistently raised this issue. While an earlier iteration of the draft had designated Newbridge as a Key Growth Settlement, this designation has now been removed in the draft RSES. Kildare County Council seeks to have Newbridge recognised given its strategic importance in the hinterland and proposes that Newbridge should be identified as a Key Town in the RSES.

The emphasis throughout the draft RSES on place-making (though more tangible guidance/actions are desirable), quality of life and the threading of climate awareness and considerations throughout the document is commended. Also of note is the attention to green infrastructure and related regional policy objectives.

This submission should be read together with the three previous submissions on earlier versions of the draft RSES (dated 16<sup>th</sup> February 2018, 1<sup>st</sup> June 2018 and 28<sup>th</sup> August 2018).

Your attention is drawn to Addendum 1 which sets out the concerns raised by Members of Kildare County Council at a workshop on the draft RSES held on 14<sup>th</sup> January 2019. A number of additional points (to this submission) are made which should be considered in preparing the final RSES.

## **2.0 GROWTH STRATEGY**

### **2.1 Growth Enablers**

The growth strategy is based around 'growth enablers' for the region for areas (such as Dublin Metropolitan Area, Hinterland Area and Outer Region) and the Dublin Belfast Corridor.

It is considered that regard should be had to the (1) Dublin-Wexford Corridor and (2) Regional Linkages. Growth enablers should then be considered and developed for these corridors/areas.

The Dublin-Wexford corridor is as important as the Dublin-Belfast corridor, particularly in light of Brexit. Consideration of this corridor and its implications for the region needs to be addressed in the RSES.

While much consideration is afforded to linkages to Dublin City, particularly around public transport infrastructure, no attention is afforded to linkages to and from Key Towns and regional growth centres both within the region and to such towns and centres outside the region. As Regional Growth Centres and Key Towns act as growth drivers for the region (and beyond) generally, attention needs to focus on the linkages between these settlements. An integrated land use and transportation approach (mentioned in Chapter 8 in the draft RSES) would call for such a consideration.

There is an opportunity to include relevant narrative, mapping and regional policy objectives in this regard.

## **2.2 Population Projections**

The NPF Roadmap has prescribed county population projections to 2031, within a range of 20%. While the population projection is referenced for the Dublin City and suburbs, it is has not, however, set out the population projections for the Metropolitan Areas at 2026, 2031 or 2040. Kildare County Council has previously sought clarity as to what the population projection is for the Dublin Metropolitan Area, and it is re-iterated that this information should be in the RSES. This would enable a greater understanding of how delivery and location of growth will be targeted in the MASP.

It would be beneficial if the population projections could be graphically represented relative to the relevant boundary areas. It would also be beneficial if the area in the Metropolitan Area and outside the City and Suburbs would be given a title for clarification purposes.

## **2.3 Transference of Population Growth**

It is noted that the NPF states (pg 135):

*“It would be reasonable in the context of a Metropolitan Area Strategic Plan and phasing-in the transition to achieving urban consolidation and brownfield targets, that a proportion of up to 20% of the phased population growth targeted in the principal city and suburban area, could potentially be accommodated in the wider metropolitan area i.e. outside the city and suburbs or contiguous zoned area. This would be in addition to growth identified for the Metropolitan area”,*

The ‘Roadmap’ states on pg 5:

*“All five City Metropolitan areas may make provision for 20% of targeted city and suburbs growth for each Census year and related intercensal period, in addition to projected population growth i.e. to 2026 and, subject to review, 2031”.*

In order to consider the implications of these statements the RSES needs to advise what the population projections are, not just for the Metropolitan Area (as stated above) but also for Dublin City and Suburbs over the relevant periods of 2026, 2031 and 2040. Failure to do so will result in confusion and a lack of clarity, particularly when Councils have been tasked with preparing revised Core Strategies.

The RSES states that 20% of the targeted growth of the City and suburbs can be transferred to Bray, Maynooth and Swords. It is not clear that population growth targeted for the Metropolitan Key Towns cannot be transferred to other areas in the event that additional growth from Dublin City and Suburbs is transferred to Bray, Swords and Maynooth. Clarity on this issue would be welcome.

## **2.4 Headroom**

The RSES states that the *“National Planning Framework (NPF) Roadmap population projections already incorporate 25% headroom figures for all parts of the country”*. Your attention is drawn to the NPF Roadmap which states that:

*“Cumulatively, [...] provision for 50% more growth than is required to 2026 has effectively been accounted for at national level.”<sup>1</sup>*

Clarification on the actual headroom is required.

Clarification should be provided as to whether the headroom shall be applied at population growth or land zoning. Clarity would also be welcome on the period over which the additional 25% is to be applied.

## **2.5 Asset Based Approach**

The RSES states that an evidence driven asset-based approach was developed to identify a spatial hierarchy of settlements in the region. No evidence of this assessment has been made available. It is not clear what metrics were used to measure or weight the settlements. This data (and associated methodology) should be made available for transparency and analysis. Full disclosure would enable the approach to be replicated across the region. Indeed, there should be a common evidence-based approach and methodology across the country.

The asset-based approach should be informed by environmental capacity (not just environmental sensitivities and assets).

The asset-based approach would benefit from a cost-benefit analysis of providing necessary infrastructure (where known) to facilitate growth. This additional assessment, could then, further inform the growth strategy.

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<sup>1</sup> NPF Roadmap, pg 5

## 2.6 Key Towns

The draft RSES states that there are a number of medium to large settlements, which also have strong service and employment functions and have the capacity to support a level of commensurate population and employment growth. Some of these may have the potential to become drivers for growth in the county subject to local authority assessment. It needs to be clarified that a local authority has the freedom to identify other Key Towns (such as Newbridge) in their county.

The formulation of socio-economic functions of Key Towns differs from place to place. For example, "Key Towns act as economic drivers and employment centres for the region (p.39) and "...provide employment for surrounding areas" (p. 41). This is not the same. The first function is strategic to the entire region; the latter is more local in nature.

It appears from reading section 4.3 that Key Towns can be designated at county level by local authorities. Clarification on this matter would be welcome.

### 2.6.1 Naas Key Town

It is requested that the section on Naas Key Town be enhanced along the following lines:

#### **Introduction**

Naas, Kildare's county town, holds a strategic profile nationally and regionally and is the first major town west of the Dublin Metropolitan Area. Naas enjoys multiple accesses to/from the M7 and is well serviced by the Sallins-Naas Railway Station located 3km from the town centre. The town acts as a strong employment base which is evident from its high employment base which is evident from its high ratio of jobs to resident workers of 1.122. The population of Naas at 21,597 in 2016 is relatively young and highly skilled. There is potential to capitalise on the significant infrastructure investment which has taken place in Naas, to further strengthen the local employment base, promote regeneration and consolidation of the town centre and surrounding residential and employment areas, with improved permeability and sustainable transport links and to build on assets including the historic centre, Naas Racecourse and Grand Canal.

#### **Regeneration**

A key priority for Naas is the regeneration of the historic town centre with enhancement of retail and commercial functions and consolidation of strategic development areas including the Castle Quarter, Devoy Quarter, Corban's Lane and the Canal Quarter, along with the further development of Millennium Park in the Northwest Quadrant and the regeneration of industrial lands in the north east of the

town. The targeted regeneration of these areas will enable a greater proportion of development to be delivered within the existing built-up footprint of the town.

### **Economic Development**

The regeneration of the town centre along with the opening of Corban's Lane Shopping Centre positions Naas to provide significant retail and commercial functions. Kildare County Council continues to direct high-quality high-density enterprise and employment development, including Foreign Direct Investment into the Northwest Quadrant of Naas focussing on high tech manufacturing, research, ICT, food science and production, public administration, banking, tourism and bloodstock while supporting a strong SME and start up/incubation culture through the development of the Mid East Region Think Space (MERITS) adjacent to the offices of Kildare County Council. There is also potential for re-intensification of industrial lands in the northeast of the town.

### **Services and amenities**

Naas has a general hospital and a large primary care centre while McAuley Place provides alternative residential and social care for older people in the town. Historic assets include the historic centre, St. David's Castle, Leinster Mills and Jigginstown Castle. The Naas Branch of the Grand Canal runs southwards from Sallins to the canal harbour in the heart of the town and then branching off to Corbally Harbour. There is potential to develop the amenity, recreation and sustainable transport potential of the canal including the development of greenways from Naas to Sallins and to Corbally harbour and linking to the inter-regional Grand Canal Greenway.

There is a need to redress past legacies of rapid housing growth to ensure the delivery of further appropriately and easily accessible social, education, recreation, sports and amenity spaces to ensure that facilities grow to meet the needs of the increasing population and keep pace with development.

### **Enabling Infrastructure**

Naas has high levels of car dependency, congestion and commuting to Dublin along with a strong interrelationship of services, employment and education between the settlements of Naas, Sallins and Newbridge. Further investment is needed in public transport and active travel connections within the town linking residential areas and the Northwest Quadrant to Sallins-Naas Railway Station. Through targeted investment, the town can achieve a walkable and cycle friendly connected environment underpinned by a sustainable transport network. This network is dependent upon:



- a new central spine connecting the town centre to the North West Quadrant that prioritises public transport and links to Sallins-Naas Railway Station;
- the extension of rail electrification as far as Sallins-Naas Railway Station under Iarnród Éireann's Kildare Route Project;
- the creation of new east west linkages across the Grand Canal;
- the development of a public transport interchange with Park and Ride facility to serve the existing and future population and employment growth;
- the delivery of the Naas to Sallins Greenway;
- the completion of M7 widening, Junction 9a and Sallins By Pass;
- the delivery of the LIHAF Funded Inner Relief Road;
- the rationalisation of the bus service and continued roll out of a robust and connected cycle network;
- the development of a permeability and public realm strategy for the town centre.

These objectives are being addressed in the Transport Management Plan currently being prepared by Kildare County Council.

#### **Regional Policy Objectives: Naas**

**RPO:** Regeneration and consolidation of the historic centre to improve the retail and commercial functions of the town core, with enhanced permeability and sustainable mobility within the town centre and improve links between the core and surrounding residential and employment areas through the further development of walking and cycling routes and improved public transport.

**RPO:** Strengthen the local employment base by attracting high quality high density indigenous and Foreign Direct Investment through the development of MERITS, Millennium Park in the North West Quadrant and the regeneration of underutilised lands including industrial lands in the north east of the town.

**RPO:** Promote the development of a sustainable transport network within and serving Naas town, including walking, cycling and bus links between the town centre to Sallins-Naas Railway Station and to key destinations within the town including the North West Quadrant.

**RPO:** Support the delivery of a dedicated public transport interchange in Naas with associated Park and Ride and the extension of rail electrification as far as Sallins-Naas Railway Station under the Kildare Route Project.

**RPO:** Support the development of the Grand Canal for amenity, recreation and sustainable transport purposes including the Naas to Sallins and Naas to Corbally harbour greenways and linking these to the national Grand Canal Greenway.

**RPO:** Support an enhanced role and function of Naas as the County town of Kildare, particularly as a hub for high quality employment, residential and amenities.

**RPO:** Support the development of IDA Advanced Office Space in Naas.

## **2.6.2 Maynooth Key Town**

It is requested that the section on Maynooth Key Town be enhanced along the following lines:

### **Introduction**

Maynooth, with a population of 14,585 in 2016, is a large economically active and vibrant university town in north-east Kildare. The town is located in the Dublin Metropolitan Area and is strategically located on the Dublin to Sligo railway line, M4 motorway and the Royal Canal. Maynooth has experienced significant growth rates in the last 10 years (36% compared with an EMRA average of 15%). It is a vibrant university town with a young demographic, as many students are living in and travelling to the town to attend Maynooth University. The town enjoys relatively high rates of sustainable travel. St. Patrick's College, the Royal Canal, Maynooth Castle and the nearby demesne landscape of Carton are key assets and tourist attractions. The Maynooth Business Park is located south of the M4 motorway and is one of the main employment areas in the town.

### **Regeneration**

Opportunities exist within Maynooth for the expansion of the town centre in a sustainable manner by utilising backland areas, in particular the Harbour Area which is located along the Royal Canal and the railway station and to the east of St. Patrick's College. The Canal Harbour regeneration lands comprise of a number of brownfield sites, some vacant buildings/sites and a substantial public park which provides the community with playing pitches as well as a playground.

### **Economic Development**

Maynooth provides a significant level of employment at Maynooth University, the M4 Business Park to the south of the town and through local business within the town centre. While the number of people at work within the town is relatively high, a significant number of the town's residents commute to the Dublin area for employment using the existing transport links. The town has significant opportunities to further develop a knowledge based economy focusing on high-

tech/biotechnology, research and development, ICT and manufacturing through the development of key research and technology lands adjoining the university campus with synergies to key employment sites in Leixlip such as Intel, lands at Collinstown and the HP lands at Barnhall.

The further development of Maynooth University as a leading third level research and educational facility is critical to the future development of the town and the region. Key lands are identified for the provision of a research and technology campus to the west of the existing university campus.

A number of higher order services and facilities are located in the town including high quality secondary and tertiary education services, health services, sports facilities, library and other cultural, leisure and recreational facilities. In addition, the town has significant opportunities to act as a major shopping destination with the ability to attract residents from the surrounding towns and villages. In this regard lands have been identified to facilitate the expansion of the town centre in the Harbour area and Carton Park which are capable of maximising synergies with the town's existing core retail area.

#### **Services and Amenities**

Maynooth has the potential to capitalise on existing tourism assets such as St Patrick's College, Maynooth Castle and Carton House through connections which maximise the presence of the Royal Canal and its designation as Euro Velo Route 2 forming part of a Pan-European walking and cycling route, linking Galway to Moscow.

Growth in Maynooth since the adoption of the Kildare County Development Plan 2017-2023 has been significant. New residential activity has been permitted or is under construction along the Moyglare, Dunboyne and Dublin roads with further lands designated for residential development to the south east at Greenfield and Railpark. The development of the Railpark lands to the south-east of the town are subject to LIHAF funding for a new relief road and bridge over the railway line together with the promotion of linkages to the Royal Canal towpath and town centre.

Further potential for consolidation of the built form of Maynooth exists to the north west of the town at Crewhill and to the south west at Newtown where there are opportunities to provide for significant new residential development. Lands at Moygaddy, County Meath which form part of Meath County Council's Maynooth Environs plan have been identified for development subject to appropriate infrastructure provision being provided.

## **Enabling Infrastructure**

Planned infrastructure upgrades include the M4 from Maynooth to Leixlip and approved LIHAF funding for a relief road to the south-east of the town. The DART Expansion project and proposed electrification of the rail line to Maynooth represents a significant opportunity for sequential growth in Maynooth. A new sewer connection for the Railpark lands, in association with the Local Infrastructure Housing Activation Fund (LIHAF) road linking the R148 with the M4 will unlock significant development potential.

Accessibility within and around the town requires the further promotion of pedestrian/cycle permeability alongside the development of the Maynooth Outer Orbital Route (MOOR) which encompasses lands identified for development within County Meath, connecting the east of the town and to the west where the provision of new roads connecting the Moyglare Road to the Kilcock Road are required.

The potential for a second interchange along the M4 to the west of the town offers the opportunity to further alleviate through traffic in the town centre. Having regard to the proposed status of Maynooth as a Key Town in the Metropolitan Area, the RSES should positively address the requirement for an additional M4 interchange in the vicinity of Maynooth.

Having regard to the National Policy Objective 70<sup>2</sup> in the NPF, the need for a planned approach to the overall consolidated development of the entire urban area, together with the infrastructural requirements in the delivery of the MOOR, Kildare County Council supports the preparation of a Joint Urban Area Plan for Maynooth.

## **Regional Policy Objectives: Maynooth**

**RPO:** Support the continued development of Maynooth, co-ordinated with the delivery of strategic infrastructure including pedestrian and cycle linkages within the town and to the Royal Canal Greenway, DART expansion and road linkages forming part of the Maynooth Outer Orbital Route in a manner which supports future economic development and population growth and builds on synergies with Maynooth University promoting a knowledge based economy.

**RPO:** Support the delivery of a new M4 Interchange near Maynooth.

**RPO:** Act as an economic driver for north Kildare and provide for strategic employment locations to improve the economic base of the town by increasing the ratio of jobs to workers.

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<sup>2</sup> National Planning Framework, pg 136: *“Provision will be made for urban area plans, based on current local area plan provisions, and joint urban area plans and local area plans will be prepared where a town and environs lie within the combined functional area of more than one local authority.”*

**RPO:** Prepare a cross-boundary Joint Urban Area Plan (UAP) by Kildare County Council and Meath County Council to provide a coordinated planning framework for the Maynooth area. The Joint UAP shall identify a boundary for the plan area and strategic housing and employment development areas and infrastructure investment requirements and promote greater co-ordination and sequential delivery of serviced lands for development.

**RPO:** Promote the consolidation of the town centre with a focus on regeneration of underused buildings and strategic sites and the encouragement of residential uses to encourage greater vibrancy outside of business hours and the enhancement of the public realm.

## **2.7 Newbridge as a Key Town**

Following earlier submissions made by Kildare County Council, Newbridge was included in the emerging working draft of the RSES as a 'Key Growth Settlement' in the region. Newbridge has now been removed from the draft RSES with no explanation and no evidence to suggest why it might have been removed.

The logic of excluding Newbridge as a 'Key Town' (the 5<sup>th</sup> largest town in the mid-eastern SPA) is questioned; Newbridge is the only large town of the ten largest towns in the mid-eastern SPA that is excluded as a key town. Newbridge is a dynamic town, on a main rail line, with good connectivity to the wider hinterland, is a regionally significant town with regional scale employment and retail facilities, and has been an integral part of Ireland's regional planning since the 1960s.

Kildare County Council has in previous submissions to EMRA, put forward Naas and Newbridge as Key Towns/priority settlements in County Kildare, where there is scope for both settlements to thrive. Relevant data to support the proposal of identifying Naas and Newbridge as Key Towns /priority settlements was included in earlier submissions (to EMRA) including reference to the significant investment in infrastructure which is presently being expended. Irish Water is progressing the Upper Liffey Valley Sewerage Scheme Contract 2A (at an estimate cost of €31m) which includes the construction of a new interceptor sewer to connect Newbridge to the Osberstown Wastewater Treatment Plant. Once the proposed project is complete it will facilitate increased flow to the existing Osberstown Wastewater Treatment Plant and support future population and economic growth in Newbridge.

In the event that Naas is not designated a 'Key Town' in the RSES, consideration should be given to designating Naas/Newbridge as joint towns, as was proposed in earlier iterations of the draft RSES. Their proximity and functional inter-dependence would support this approach.

## **2.8 Leixlip as a Key Town**

In line with earlier submissions, Kildare County Council seeks to have Leixlip designated as a Key Town (in the Metropolitan Area). The designation of Leixlip as a Key Town would recognise the significant presence of existing foreign companies in the town, which account for at least 4,500 jobs and would assist in enabling the delivery of the strategic employment sites mentioned in the draft RSES (at Collinstown and on the HP lands at Barnhall). Leixlip has two train stations (at Confey and Louisa Bridge), and is extremely well served by both rail and bus services. Rail electrification is planned for the Leixlip line. The proximity of the M4 is also important, and a Park and Ride facility would complement existing transport services.

This designation would acknowledge the Planning and Development (Leixlip Local Area Plan 2017 – 2023) Direction 2018, whereby the Minister has directed Kildare County Council to prepare a revised draft Leixlip Local Area Plan which provides for 3,300 new dwellings as required by the current County Kildare Core Strategy.

## **2.9 The Outer Region – Rural Areas**

It is considered that the RSES should address the issue of rural housing in a regionally co-ordinated manner. Notwithstanding that local housing need assessments will inform the approach at county level, the over-riding consideration should be based on environmental constraints, supported by evidence based data. The evidence based data, should project forward using trend analysis, to inform sustainable rural housing policies. This ‘bigger picture’ approach should be supported in the RSES.

With respect to rural towns and villages, RPO 4.50 and RPO 4.51 relate to regeneration projects and serviced sites respectively. Many of Kildare’s smaller towns and villages do not have adequate wastewater infrastructure to service existing and future populations. There is a need for the RSES to acknowledge this and to require the support of Irish Water to support the continued improvement of infrastructural deficits of our rural towns and villages in accordance with NPF objective 18b. The RSES should prepare an RPO in this regard.

It is submitted that a selection of rural town and villages for such projects or serviced sites settlement should be based on an evidence-based approach with associated cost-benefit analysis. A set of criteria could be developed to inform the selection process at County Development Plan level, and subsequently, any funding allocation.

## **2.10 Recommendations:**

1. It is considered that regard should be had to the (1) Dublin-Wexford Corridor and (2) Regional Linkages. Growth enablers should then be considered and developed for these corridors/areas.

2. The RSES needs to advise what the population projection is, not just for the Metropolitan Area but also for Dublin City and Suburbs over the relevant periods of 2026, 2031 and 2040.
3. It is not clear that population growth targeted for the Metropolitan Key Towns cannot be transferred to other areas in the event that additional growth from Dublin City and Suburbs is transferred to Bray, Swords and Maynooth.
4. Clarification on the actual headroom is required; whether the headroom shall be applied at population growth or land zoning and the period over which the additional 25% is to be applied.
5. The evidence used to identify a spatial hierarchy of settlements in the region should be made available. The asset-based approach should be informed by environmental capacity (not just environmental sensitivities and assets) and a cost-benefit analysis of providing necessary infrastructure (where known) to facilitate growth. This additional assessment, could then, further inform the growth strategy.
6. It appears from reading section 4.3 that Key Towns can be designated at county level by local authorities. Clarification on this matter would be welcome.
7. The relevant sections and RPOs on Naas & Maynooth Key Towns should be enhanced (refer to 2.6.1 and 2.6.2).
8. Newbridge and Leixlip should be identified as Key Towns having regard to its scale, function and level of investment in public services.
9. Rural towns and villages selected for serviced sites initiatives should be based on an evidence-based approach.

### **3.0 ECONOMY AND EMPLOYMENT**

It would appear that Chapter 6, Economy and Employment, includes little actual strategy. In many places, the draft provides very general ideas and refers to existing strategies and initiatives of relevant actors and seems to leave it to the local authorities to develop the strategy (via the Regional Enterprise Plans). This seems to be at odds with the notion of a Regional Spatial and *Economic Strategy*. The chapter contains few specific strategies for Key Towns and other settlement types e.g. large /medium towns.

#### **3.1 Profile**

Table 6.1 breaks down employment into Public, Services, Goods and Unclassified. This is a rather meaningless classification for strategy formulation and is not employed in the remainder of the draft. Table 6.2 is potentially more informative. However, little has been done with the data in this table to inform the economic strategy at sub-regional level.

#### **3.3 Economic Strategy**

Regarding 'Sustainable growth', RPO 6.2 states that:

*“Local Authorities shall have regard to environmental and sustainability considerations for meeting sustainable development targets and climate action commitments, in accordance with the National Adaptation Framework. In order to recognise the potential for impacts on the environment, Local Authorities shall address the proper site/route selection of any new development and examine environmental constraints including but not limited to biodiversity, flooding, landscape, cultural heritage, material assets, including the capacity of services to serve any new development.”*

The responsibility to develop sustainably falls not on local authorities alone, but on all actors that contribute to economic development. It is suggested that ‘local authorities’ should be replaced with ‘local authorities and other actors/agencies’.

Reference is made to the “Smart City concept” which “plays to our strengths in ICT and our small international scale...” It is unclear how the concept could play to “our strengths in our small international scale.”

Regarding ‘Health Place Audits’, Kildare County Council supports the idea of a Health Place Audit to audit the quality of specific places. Such audits should not be reserved to cities and Regional Growth Centres.

Regarding ‘Strategic Employment Development’, a definition of the term would be useful, particularly as Local Authorities will seek to identify such locations across the region. RPO 4.23 states that Key Towns shall provide for strategic employment locations. Chapter 6 should acknowledge/reference this RPO. The draft provides some guidelines for the process of identifying locations at regional, metropolitan and local level (pg. 91). Here, and in other places in Chapter 6, there is a strong focus on Technology Innovation Poles (TIPs) as strategic sites for employment growth and enterprise development. These TIPs are, in places, equated to Institutes of Technology and Universities (see pages 91, 95 and 104). This could lead to enterprise agencies excluding towns without a third-level institute from consideration as a location for the development of research-based, high-skilled jobs and internationally traded services.

The RSES should emphasise that locations for research-based, high-skilled jobs and internationally traded services are not restricted to towns with third-level institutions. The draft does not refer to the IDA advance office buildings programme although this provides an important infrastructure for the attraction and development of international services activities. Chapter 6 should refer to this programme and state that Key Towns and other large towns can provide suitable locations for IDA advance office buildings.

The guiding principle for investment prioritisation includes “explore a ‘second site’ strategy for Multi-national Corporations (MNCs) in outlying locations” (pg. 91). Kildare County Council strongly supports this strategy. Various locations in the Eastern SPA have already benefitted from relocations/expansions of financial services businesses out of Dublin. Examples include Naas, Drogheda and Dundalk. Enterprise agencies should undertake a study to identify companies interested in second site strategies.



### **3.4 Economic Engines & Sectoral Opportunities**

A list of sectoral opportunities for Dublin, Dublin Economic Corridor, regional growth centres, towns and villages is provided under the title 'Sectoral Opportunities in Dublin and Eastern SPAs'. The draft states "this list is not exhaustive and should not be viewed as a limitation" (pg. 94). The 'lists' of sectoral opportunities include very obvious general categories and are developed mainly in relation to Dublin and the Growth Centres. Greater emphasis on sectoral opportunities in the Eastern SPA is desirable. The new Regional Enterprise Action Plan for Kildare, Wicklow and Meath and relevant actions therein should be referenced.

Little specific ideas are developed for other places and areas outside of Dublin and the Regional Growth Centres - the single paragraph on Key Town and Medium-to-Large Towns is insufficient. Key Towns and Medium to Large Towns are twinned as if there is no differentiation between them. To reflect the growth strategy hierarchy, greater emphasis should be placed on the Key Towns, followed by Medium to Large Towns. The economic strategy could be said to be lacking in this regard.

Reference should be made to the Dublin-Rosslare Corridor, which is more critical than ever given Brexit. It is as important as the Dublin-Belfast Economic Corridor.

### **3.5 Specific Sectors: Retail, Tourism, Marine, Agriculture**

The reason for selecting the specific sectors for detailed discussion needs to be introduced/clarified.

### **3.6 Drivers for Resilient and Sustainable Economic Growth**

In a number of places, Section 6.6 does not really provide a strategy. It merely lists the active agencies and their activities.

Reference is made to 'The Smart City' and that there are "opportunities for greater innovation in and around our more consolidated areas." It is not clear what is meant here. Greater clarity would be useful.

The draft recognises the challenges faced by unemployment blackspots (pg. 106) and this is welcomed. However, the draft does not provide any guidance as to a strategy for addressing these challenges.

There is a need for high quality office space outside of Dublin (in Kildare in particular) and this should be recognised in the RSES. County Kildare has a shortage of high-spec office space. In addition, adding IDA Advance Office Buildings to the IDA property solutions in County Kildare would strongly enhance the chance of Co. Kildare attracting informational economy activities.

### **3.7 Regional Investment Plan**

Reference is made to the preparation of a Regional Investment Plan (RPO 6.27 refers). Little detail is provided about such a plan or the level of influence it would have. Also, there is no reference to local authorities having an input to these. Greater clarity and buy-in from agencies would be necessary.

#### **Recommendations:**

10. The draft provides very general ideas on the economic 'strategy' and refers to existing strategies and initiatives of relevant actors.
11. A definition of the term 'Strategic Employment Development' would be useful. The RSES should emphasise that locations for research-based, high-skilled jobs and internationally traded services are not restricted to towns with third-level institutions.
12. Reference should be made to the IDA advance office buildings programme. Key Towns and other large towns can provide suitable locations for IDA advance office buildings.
13. To reflect the growth strategy hierarchy, greater emphasis should be placed on the Key Towns, followed by Medium to Large Towns.
14. Enterprise agencies should undertake a study to identify companies interested in second site strategies, which should be incorporated into the economic strategy.
15. The RSES should provide guidance for addressing challenges such as economic blackspots.
16. The need for high quality office space outside Dublin (in Kildare in particular) should be recognised.
17. Greater detail is required in respect of the Regional Investment Plan.

### **4.0 ENVIRONMENT**

Kildare County Council strongly supports the MASP Green Infrastructure (GI) RPO 5.7 relating to a regional GI policy in the Dublin Metropolitan area, which is considered of critical importance to arrest the coalescence of metropolitan towns. RPO 5.7 should also be referenced in Section 7.6 Green and Blue Infrastructure.

A policy to identify and develop national and regional parks for an increasing population should be included. An assessment of need of regional parks/accessible open space should be undertaken based on best practice.

It is understood that an independent submission is being made by the Regional Climate Action Office in respect of Climate Change.

## **Recommendations:**

18. RPO 5.7 (relating to a Green Infrastructure policy) should also be referenced in Section 7.6 Green and Blue Infrastructure.
19. A policy to identify and develop national and regional parks for an increasing population should be included in the RSES.

## **5.0 CONNECTIVITY**

Reference is now made in the draft RSES to various LIHAF projects which are relevant to transport infrastructure – no mention however is made to the LIHAF project in Naas. Please refer to the section 2.6.1 above for further details.

Regard should be had of the need to deliver road and Vulnerable Road User projects in the identified Key Towns. Key issues with the delivery of these projects are the approval of funding and the availability of technical resources. The RSES should stress the importance of these ‘enablers’. Critical projects referenced above in relation to Naas and Maynooth Key Towns should be captured in this Chapter.

There is a concern that there may be difficulty in the future for Kildare County Council in securing funding for road and bridge infrastructure projects in towns that are not designated as Key Towns in the RSES i.e. the Celbridge Second Bridge Crossing and the Newbridge Second Bridge Crossing over the River Liffey.

There is a need to identify additional and enhanced park and ride facilities within the region, in particular in County Kildare, at Maynooth, Leixlip, Kilcock and Celbridge.

There is no mention of the DMURS standards in Chapter 8 Connectivity which promotes permeability and connectivity and alternative modes of transport, in particular cycling and walking. It is recommended that this is included.

## **Recommendations:**

20. The RSES should stress the importance of delivering road and Vulnerable Road User projects in the identified Key Towns of Naas and Maynooth.
21. There is a need to identify additional and enhanced park and ride facilities within the region, in particular in County Kildare, at Maynooth, Leixlip, Kilcock and Celbridge.
22. The RSES should support the ability of medium-large towns to attract funding where there is an identified need for critical infrastructure, e.g. Celbridge Second Bridge Crossing and the Newbridge Second Bridge Crossing.
23. The RSES should make reference to DMURS.

## 6.0 QUALITY OF LIFE

The chapter on Quality of Life while commendable lack actions and transferable policies. While much is made of the need for a better quality of life and the need for a modal shift to cycling and walking, the need for creating safer environments by reducing use of private car is not apparent. Many of our towns and villages are choked with congestion which create unsafe environments for vulnerable road users. The RSES should translate this need into positive policies. Delivering the vision of a healthier quality of life requires meaningful objectives, i.e. the need for bypasses of certain towns.

There is a greater need of integration between health planning and landuse planning. There should be a rational structure applied to services required, complementary to a health strategy, which can inform landuse planning. The level of services required should be commensurate with the function of a settlement.

## 7.0 INFRASTRUCTURE

RPO 10.9 states that EMRA supports the servicing of rural villages (serviced sites) as an alternative to one-off housing (see comment under 2.9 above). NPF National Policy Objective 18b is relevant:

*“Develop a programme for ‘new homes in small towns and villages’ with local authorities, public infrastructure agencies such as Irish Water and local communities to provide sites with appropriate infrastructure to attract people to build their own homes and live in small towns and villages.”*

The RSES should recognise that the approach of servicing rural villages will require investment from Irish Water and from Government. A Regional Policy Objective recognising that funding needs to be provided by Irish Water to support serviced sites and rural villages is considered necessary.

With regard to Infrastructural Assessments, National Planning Framework Objectives 72a-72c highlight the need for a standardised tiered approach to zoning of land with infrastructural assessments and cost of delivery of infrastructure determined. There is no mention in the draft RSES of such assessments. The NPF objectives should be referenced in the RSES and the important role of agencies should be highlighted, e.g. Irish Water. Furthermore, there is an immediate and urgent need for clear and concise guidance on Infrastructural Assessments.

### Recommendations:

24. The RSES should recognise that funding needs to be provided by Irish Water to support serviced sites and rural villages.
25. The RSES should include narrative on the use of Infrastructural Assessments to inform the zoning of land, as required by the NPF.

## **8.0 MISCELLANEOUS**

- Change references to NUI Maynooth to Maynooth University;
- The draft is not precise in the use of central/core concepts, e.g. use of 'Key Town'; Key Town is a specific concept in the settlement hierarchy adopted in the draft RSES. In some places reference is made to 'key centres' and so forth. This is confusing. The term 'Key Town' should be reserved for the towns mentioned in the settlement strategy;
- P. 61 – "as indicated in table 4.2 ...". This is not indicated in the Table.

## **9.0 SUMMARY OF RECOMMENDATIONS**

1. It is considered that regard should be had to the (1) Dublin-Wexford Corridor and (2) Regional Linkages. Growth enablers should then be considered and developed for these corridors/areas.
2. The RSES needs to advise what the population projection is, not just for the Metropolitan Area but also for Dublin City and Suburbs over the relevant periods of 2026, 2031 and 2040.
3. It is not clear that population growth targeted for the Metropolitan Key Towns cannot be transferred to other areas in the event that additional growth from Dublin City and Suburbs is transferred to Bray, Swords and Maynooth.
4. Clarification on the actual headroom is required; whether the headroom shall be applied at population growth or land zoning and the period over which the additional 25% is to be applied.
5. The evidence used to identify a spatial hierarchy of settlements in the region should be made available. The asset-based approach should be informed by environmental capacity (not just environmental sensitivities and assets) and a cost-benefit analysis of providing necessary infrastructure (where known) to facilitate growth. This additional assessment, could then, further inform the growth strategy.
6. It appears from reading section 4.3 that Key Towns can be designated at county level by local authorities. Clarification on this matter would be welcome.
7. The relevant sections and RPOs on Naas & Maynooth Key Towns should be enhanced (refer to 2.6.1 and 2.6.2).
8. Newbridge and Leixlip should be identified as Key Towns having regard to its scale, function and level of investment in public services.
9. Rural town and villages selected for serviced sites initiatives should be based on an evidence-based approach.
10. The draft provides very general ideas on the economic 'strategy' and refers to existing strategies and initiatives of relevant actors.
11. A definition of the term 'Strategic Employment Development' would be useful. The RSES should emphasise that locations for research-based, high-skilled jobs and

internationally traded services are not restricted to towns with third-level institutions.

12. Reference should be made to the IDA advance office buildings programme. Key Towns and other large towns can provide suitable locations for IDA advance office buildings.
13. To reflect the growth strategy hierarchy, greater emphasis should be placed on the Key Towns, followed by Medium to Large Towns.
14. Enterprise agencies should undertake a study to identify companies interested in second site strategies, which should be incorporated into the economic strategy.
15. The RSES should provide guidance for addressing challenges such as economic blackspots.
16. The need for high quality office space outside Dublin (in Kildare in particular) should be recognised.
17. Greater detail is required in respect of the Regional Investment Plan.
18. RPO 5.7 (relating to a Green Infrastructure policy) should also be referenced in Section 7.6 Green and Blue Infrastructure.
19. A policy to identify and develop national and regional parks for an increasing population should be included in the RSES.
20. The RSES should stress the importance of delivering road and Vulnerable Road User projects in the identified Key Towns of Naas and Maynooth.
21. There is a need to identify additional and enhanced park and ride facilities within the region, in particular in County Kildare, at Maynooth, Leixlip, Kilcock and Celbridge.
22. The RSES should support the ability of medium-large towns to attract funding where there is an identified need for critical infrastructure, e.g. Celbridge Second Bridge Crossing and the Newbridge Second Bridge Crossing.
23. The RSES should make reference to DMURS.
24. The RSES should recognise that funding needs to be provided by Irish Water to support serviced sites and rural villages.
25. The RSES should include narrative on the use of Infrastructural Assessments to inform the zoning of land, as required by the NPF.

## **Addendum 1: RSES Workshop for Members of Kildare County Council held on 14<sup>th</sup> January 2019**

The following provides a summary of the issues/concerns raised by Elected Members of Kildare County Council in regard to the Draft Regional Spatial and Economic Strategy (RSES). It is requested that such issues be taken into consideration in the preparation of the final RSES.

The issues/concerns raised have been grouped into common themes which have been linked to the chapter headings in the RSES.

### **Chapter 2 - Strategic Vision**

- It is considered that the vision and subsequent chapters of the draft RSES are very Dublin orientated. A greater emphasis should be placed on the development of County Kildare in particular Naas given its role within the County.

### **Chapters 3/4 - Growth Strategy and People and Places**

- It is considered that the draft RSES is unclear/silent on the procedure of preparing Joint Urban Areas Plans. The RSES should set out the processes for producing such plans and what role the elected members will play in such plans.
- There is a need for the RSES to recognise the role of Newbridge alongside Naas and Sallins (as a polycentric hub). Concerns are raised that the exclusion of specific references to Newbridge will impact on the future development of the town.
- The hierarchal criteria used in the selection of Key Towns should be clearly set out in the RSES. A greater emphasis should be placed on an areas ability to be served by public transport.
- The impacts of higher density development should be recognised with an emphasis placed on appropriate locations and impacts on existing residential areas.
- There is a need to highlight the positive attributes of an area being identified as a Key Town.
- The draft RSES sets out that population growth in towns which have experienced rapid commuter-focused residential expansion without equivalent increases in jobs should seek a balancing effect with a focus on consolidation. Reference should be made to other towns within the County in addition to Sallins and Clane such as Athy which have experienced similar levels of growth without adequate employment growth.
- Active land management measures should be clearly set out in the RSES.
- The draft RSES makes reference to land prioritisation measures however no detail is provided as to how this will be implemented. The RSES should provide further details in this regard.
- The classification of ‘Hinterland’ should be changed to something more appropriate and less dismissive of County Kildare’s business potential.

## **Chapter 5 - Dublin MASP**

- It is unclear from the details set out in the draft RSES how the 20% transfer of population from the Dublin Region to the Key Metropolitan Towns of Maynooth, Navan and Bray will be carried out. Details of such transfer should be clearly set out.
- The exact meaning of the term 'compact growth' should be clearly set out.
- The need for integrated plans within the MASP is emphasised with procedures for carrying out same required.
- In regard to Green Infrastructure the Liffey Valley region should be recognised.

## **Chapter 6 - Economy and Employment**

- There is a need for a hierarchy to be developed for employment for each county within the region in order to create a work-life balance.
- A consolidation of employment growth should be emphasised within the RSES.
- A polycentric hub around Naas and Newbridge should be identified as a Green Innovation and Business Hub (future investments must have green credentials).
- Regard should be had to the Regional Aid Map and associated funding, and which includes a number of towns within the Region.

## **Chapter 7 - Environment**

- It is considered that the draft RSES is unambitious in regard to climate action. Opportunities to develop renewable energy projects should be given a greater emphasis. A particular reference should be made to Geo-Thermal Energy potential within the region.
- Within the Hinterland Area opportunities for the improvement/development of Green Infrastructure should be emphasised. Opportunities for the development of the Barrow Valley should be included within the RSES.
- Reference should be made /maintained with regard to transport modal shift targets.
- There should be a proactive policy response seeking to support cessation of exportation of contaminated soil offshore.

## **Chapter 8 - Connectivity**

- Greater details are required in regard to funding mechanisms for new roads projects.
- The RSES should recognise the potential for inward commuting from the Dublin region to employment centres within County Kildare.
- There is a need to recognise the need for increased connectivity to existing Universities.
- The need for Naas train/rail integration is required and should be emphasised in the RSES.



- In regard to Maynooth the need for new infrastructure to service the level of growth envisaged for the 'Key Town' is required. The provision of a second interchange onto the M4 should also be included.
- The expansion of the Luas Saggart Line should be considered or alternatively Park and Ride facilities for connections from County Kildare to the existing Luas lines.
- The draft RSES places an emphasis on the Dublin-Belfast corridor serving Drogheda and Dundalk. It is considered that a similar corridor should be identified for Dublin–Athlone with an emphasis placed on Key Towns within County Kildare.

#### **Chapter 9 – Quality of Life**

- The issue of social integration should be included as a key component in the further development of towns and villages.
- Reference should be made in the RSES to supporting the Age-Friendly Programme.

#### **Chapter 10 - Infrastructure**

- The draft RSES fails to specify how infrastructural deficits will be addressed.
- Concerns raised in regard to the lack of emphasis placed on the importance of Park and Ride facilities to accommodate commuters and promote public transport. Specific reference is made to increased park and ride facilities for Leixlip.
- Infrastructure should be provided in order to facilitate a work life balance for residents within the region.
- Large scale infrastructural projects should not interfere with the development of urban areas.
- That the Dublin-Cork railway line would have a new station in proximity to the new Millenium Park motorway Junction at Naas. This could have extensive parking which would take pressure off Sallins and Newbridge.

#### **Misc.**

- An index should be provided to the rear of the document.

