

Simon Musial

From: Allan Shine <[REDACTED]>
Sent: 23 January 2019 14:31
To: RSES
Subject: Kildare Chamber RSES Submission
Attachments: Kildare Chamber_RSES_Submission.pdf

FAO : Jim Conway

Please find attached the submission on behalf of County Kildare Chamber in regards to the Regional Spatial Economic Strategy. Kildare Chamber is a business membership organisation of 400 companies, the membership employ in excess of 37,000 employees.

Kind regards



Vision:

To make Kildare the location of choice for existing and potential business enterprises

Keep in touch with our weekly newsletter, sign up [HERE](#)

XXXXXXXXXXXXXXXXXXXX

XXXXXXXXXXXX

XXXXXXXXXXXX

XXXXXXXXXXXXXXXXXXXX

Naas Northwest Quadrant

Submission to Draft Regional Spatial and Economic Strategy for the Eastern and Midland Region

Jan 2019





Naas Northwest Quadrant

Submission to Draft Regional Spatial and Economic Strategy for the Eastern and Midland Region

Document Control Sheet

Client:	Kildare Chamber
Project Title:	Naas Northwest Quadrant
Document Title:	Submission to Draft Regional Spatial and Economic Strategy for the Eastern and Midland Region
Document No:	MH16043 RSES Submission

Text Pages:	22	Appendices:	NA	Current Revision:	D02
-------------	----	-------------	----	-------------------	-----

Rev.	Status	Date	Author(s)		Reviewed By		Approved By	
D02	Draft	22/01/2019	MH	<i>Nicola Kyrie</i>	HG	<i>Michael Quinn</i>	KK	

Copyright RPS Group Limited. All rights reserved.

The report has been prepared for the exclusive use of our client and unless otherwise agreed in writing by RPS Group Limited no other party may use, make use of or rely on the contents of this report.

The report has been compiled using the resources agreed with the client and in accordance with the scope of work agreed with the client. No liability is accepted by RPS Group Limited for any use of this report, other than the purpose for which it was prepared.

RPS Group Limited accepts no responsibility for any documents or information supplied to RPS Group Limited by others and no legal liability arising from the use by others of opinions or data contained in this report. It is expressly stated that no independent verification of any documents or information supplied by others has been made.

RPS Group Limited has used reasonable skill, care and diligence in compiling this report and no warranty is provided as to the report's accuracy.

No part of this report may be copied or reproduced, by any means, without the written permission of RPS Group Limited



TABLE OF CONTENTS

EXECUTIVE SUMMARY	1
1 INTRODUCTION.....	3
1.1 FORMAT OF SUBMISSION.....	4
2 DEVELOPMENT OF NAAS - POLICY AND INVESTMENT CONTEXT.....	5
2.1 NATIONAL SPATIAL STRATEGY 2002– 2020	5
2.2 REGIONAL PLANNING GUIDELINES FOR THE GREATER DUBLIN AREA 2010 – 2022.....	7
2.2.1 Settlement Typology	7
2.2.2 Economic and Employment Objectives.....	8
2.2.3 Population Projections	8
2.3 REGIONAL TRANSPORT POLICY	8
2.4 KILDARE COUNTY DEVELOPMENT PLANS.....	9
2.4.1 Population Targets	10
2.4.2 Economic and Employment Objectives.....	10
2.4.3 Infrastructure Objectives.....	10
2.5 LOCAL PLANNING POLICY - NAAS TOWN DEVELOPMENT PLAN	10
2.6 LOCAL PLANNING POLICY - NAAS NORTHWEST QUADRANT MASTERPLAN 2007	11
2.7 LOCAL PLANNING POLICY - NAAS LOCAL AREA PLAN	11
2.8 SUMMARY OF POLICY REVIEW	12
3 INFRASTRUCTURAL INVESTMENT	13
3.1 INFRASTRUCTURE UPGRADE TO SUPPORT GROWTH OF NAAS.....	14
3.2 SUMMARY OF INVESTMENT REVIEW	15
4 DRAFT REGIONAL SPATIAL AND ECONOMIC STRATEGY	16
4.1 PROJECT IRELAND 2040 NATIONAL PLANNING FRAMEWORK	16
4.1.1 Managing Population Growth	16
4.1.2 Zoning and Development of Land	16
4.1.3 Application of NPF to Naas.....	17
4.2 DRAFT RSES REVIEW	17
4.2.1 RSES Settlement Typology.....	18
4.2.2 RSES Policy Objectives for Naas	20
4.2.3 Population Projections	21
4.2.4 Draft RSES Review Summary	22
5 RECOMMENDATIONS.....	23
5.1 SETTLEMENT TYPOLOGY - DESIGNATION OF NAAS	23

5.2 HOUSING AND POPULATION PROJECTIONS	24
5.3 INFRASTRUCTURAL INVESTMENT	24
5.4 CONCLUSION	25

LIST OF FIGURES

Figure 1-1 Location of Client Lands within Naas (Land Ownership TBC)	3
Figure 2-1: Naas within Dublin and Mid East Region	6
Figure 4-1: Regional Growth Strategy.....	19

LIST OF TABLES

Table 4-1: Population Projection - Co. Kildare	21
Table 4-2: Estimated Housing and Population Projections.....	21

EXECUTIVE SUMMARY

Our client, Kildare Chamber who have a vested interest in Naas being developed in line with infrastructure as constructed and in a proper manner welcomes this opportunity to comment on the Draft Regional Spatial and Economic Strategy for the Eastern and Midland Region (RSES) published in November 2018 and is fully supportive of the overarching goal of the RSES to, *"manage future growth and ensure the creation of healthy and attractive places to live, work, study, visit and invest in."*

This submission is primarily concerned with the provision of the appropriate regional planning policy context to support the development of Naas. This town is served by the national motorway and rail network and is located on one of the most active movement and economic corridors in the country. Naas has identified areas for growth, aligned with infrastructure investment and with a threshold of scale, related to population and employment.

Naas has been targeted for significant growth within the *National Spatial Strategy 2002 -2020* and the *Regional Planning Guidelines for the Greater Dublin Area 2010-2022*. On the basis of these designations there has been large scale public and private infrastructural investment to enable Naas to function as a regionally significant population and employment centre including:

- Planning and subsequent funding (through a combination of public and private contributions) for the M7 Osberstown Interchange (directly serving the Naas Northwest Quadrant) and the R407 Sallins Bypass has been secured and is currently underconstruction;
- M7 Naas to Newbridge Motorway Widening Scheme is now being advanced by Kildare County Council and is scheduled to be completed in 2019. (total cost of all M7 and Sallins Bypass works c. €110million);
- Upgrade of Osberstown Wastewater Treatment Plant from 80,00PE to 130,000PE (total cost in excess of €80million); and
- Enabling infrastructure (roads and services) within the Northwest Quadrant (total cost circa €53million);

Failure to fully exploit the opportunities associated with the assimilative capacity would be contrary to the central tenet of sustainable planning as set out in the NPF and RSES and specifically objective **RPO 4.2** included in the Draft RSES .

"Infrastructure investment and priorities shall be aligned with the spatial planning strategy of the Draft RSES. All residential and employment developments should be planned on a phased basis in collaboration with infrastructure providers so as to ensure adequate capacity for services (e.g. water supply, wastewater, transport, broadband) is available to match projected demand for services and that the assimilative capacity of the receiving environment is not exceeded."

In order to ensure the RSES provides for the growth and development of Naas in a manner that is consistent with national, regional and local planning policy and the overarching objectives of the RSES and the NPF we would formally request that the following amendments to the Draft RSES be made:

Naas should be designated a Regional Growth Centre within the RSES.

The RSES should include the following vision: **The vision provided for in the RSES is that Naas will act as the lead town for future development in the region to become a Regional Growth Centre with a long term population target in the Region of 40,000.**

In order to ensure Naas fulfils the role of a regional growth centre the following policy objectives for Naas should be included in the RSES:

- Support the development of existing designated lands within Naas including the Northwest Quadrant to optimise the potential of these lands adjacent to the town and the opportunity to facilitate a mixed residential settlement with supporting services and facilities which will support the commercial core of the town, reinforce neighbourhood identity and enhance the physical character of the area.
- Promote the expansion of the existing enterprise ecosystem in Naas and creation or expansion of distinct industrial specialisms including agri-food and equine sectors that have developed through collaboration with the relevant enterprise agencies.
- Enhance the role of Naas as a strategic employment centre on the M7 & Dublin-Cork/Limerick Rail Transport Corridor.
- Improve accessibility and sustainable mobility in the town centre and linking with Sallins and Naas Train Station by enhancing modal choice through integration of rail, bus and taxi services.
- Support the completion of the Kildare Route Project and the provision of strategic park and ride facilities at Sallins and Naas Train Station.

1 INTRODUCTION

RPS Group Ltd, West Pier, Business Campus, Dun Laoghaire, County Dublin has been instructed by our client, Kildare Chamber of Naas Town Centre, Sallins Road, Naas, to prepare this submission in response to the Public Consultation for the Draft Regional Spatial and Economic Strategy for the Eastern and Midland Region.

Based on long term national and regional planning policy the Naas Northwest Quadrant has been identified in successive Naas Town Development Plans (2005 and 2011) as the primary opportunity to achieve the coordinated and comprehensive development of enterprise, commercial, housing and associated recreational, educational and community facilities in Naas.

On the basis of long-standing public planning policies Kildare Chamber endorses the significant investment in public infrastructure serving the town. All necessary major infrastructure to serve the development of Naas is now in place or under construction.



Figure 1-1 Overview of Naas, highlighting Naas Northwest Quadrant

The Eastern and Midland Regional Assembly is currently preparing the *Regional Spatial and Economic Strategy for the Eastern and Midland Region* (herein referenced RSES). The RSES shall support the implementation of the *Project Ireland 2040 National Planning Framework* (herein referenced NPF) and the economic policies and objectives of the Government by providing a long-term strategic planning and economic framework for the development of the region.

The Assembly has invited submissions following the publication of the Draft RSES.

1.1 FORMAT OF SUBMISSION

This submission is set out in five sections:

Section 1 (this section) provides a general introduction and outlines format of submission.

Section 2 sets out the existing planning and transport policy pertaining to Naas. This review shows the longstanding policy support for significant growth within Naas.

Section 3 details the very significant public and private sector investment in infrastructure that has been made to facilitate the growth of Naas and identifies the need to exploit the opportunities associated with the existing infrastructural capacity.

Section 4 provides an outline of the Draft RSES and specifically the provisions for Naas. Key omissions in the policy framework providing for the future development of Naas are identified.

Section 5 provides a summary of the analysis and sets out a number of recommendations for inclusions within the RSES to better provide for the future development of Naas, particularly given the urgent requirement for housing within the region.

2 DEVELOPMENT OF NAAS - POLICY AND INVESTMENT CONTEXT

Naas is located strategically on a national motorway and rail transport corridor, close to Dublin city and is the county town of Kildare. The M7/M9 corridor links Cork, Limerick and Waterford to Dublin, and further through the M1 corridor to Belfast, thus linking the island's biggest settlements and economic engines.

The town has grown significantly as a population and employment centre in recent decades. There is now a population of c. 22,000 within Naas and the number of jobs in the town (10,999 as per 2016 Census) exceeds the resident working population.

Naas is a settlement which has identified areas for growth, aligned with infrastructure investment and with a threshold of scale, related to population and employment, now able to deliver on proper planning principles of variously, (a) efficiency of infrastructure utilisation, (b) well designed place making at locations such as Millennium Park, (c) green route options along the canal and associated areas, to secure a stronger definition of linkages between the main street and the employment and future residential options at Millennium Park.

The development of Naas has been supported by an appropriate planning policy framework and this has enabled significant public and private infrastructure investment. It is necessary that the RSES continues to provide appropriate regional level planning policy for Naas to allow the town deliver employment and housing in line with the infrastructural capacity of the town.

A review of the principal planning policy documents supporting this growth is set out below.

2.1 NATIONAL SPATIAL STRATEGY 2002 – 2020

The *National Spatial Strategy 2002 – 2020* (herein referenced NSS) when published in 2002 was envisaged as providing high level policy on the spatial development of the state up to 2020. Subsequent regional and local planning policy was based on the overarching policy context set out in the NSS.

Naas was designated as a 'Primary Development Centre' on a National Transport Corridor in the NSS as shown in **Figure 2.1**. With regard to Primary Development Centres the NSS states:

"The Primary Development Centres need to aim at a population level that supports self-sustaining growth, but which does not undermine the promotion of critical mass in other regions. This suggests an ultimate population horizon of up to 40,000 people for the primary development centres."



Figure 2-1: Naas within Dublin and Mid East Region

The growth of Naas was to be based upon the town serving as a centre for development and employment in its own right while also benefitting from its proximity and connectivity within Dublin. The NSS states:

"The future role of towns such as Navan, Naas and Wicklow needs to take account not just of their relationship with Dublin, but also their function in the development and servicing of their own catchment areas and their relationship with other adjoining regions."

The NSS recommends the focusing of growth on towns such as Naas:

"Concentrate development in strong towns with capacity for growth on well-served public transport corridors, such as Navan, Naas, Newbridge, Kilcullen, Arklow, Drogheda and Balbriggan."

Regional and local planning policy and private and public investment in Naas since 2002 has been based on this high level vision for Naas as a significant urban centre with a population of up to 40,000.

The NSS also sets out an 'Asset Test' for the consideration of housing in urban areas. The Asset Test sets out criteria by which the suitability of an urban area for increased housing will be considered. The criteria to be considered include; potential for reinforcing usage of public transport, walking and cycling, potential to ensure integration between the location of housing and employment, a sense of place and character and reinforcing the integrity and vitality of the local community and services.

An analysis of the Naas Northwest Quadrant with reference to the NSS Asset Test indicates that the lands are suitable for development and will:

- Have a sense of place and character – particularly through integration with the Grand Canal;
- Reinforce usage of public transport, walking and cycling – pedestrian and cycle links with existing Naas town centre, connectivity with Sallins and Naas Train Station;
- Integrate housing and employment – mixed use development including residential and employment.
- Reinforce the vitality of the local community – provide for the contiguous growth of Naas in a planned coordinated manner.

2.2 REGIONAL PLANNING GUIDELINES FOR THE GREATER DUBLIN AREA 2010 – 2022

The *Regional Planning Guidelines for the Greater Dublin Area 2010-2022* (RPG) provide a strategic planning framework for the Greater Dublin Area (herein referenced GDA). The RPG aim to direct the future growth of the Greater Dublin Area over the medium to long term and to give effect to the strategic planning framework set out in the NSS.

2.2.1 Settlement Typology

The settlement typology contained in the RPGs sets out a hierarchy of settlement types. The RPGs designate Naas a "Large Growth Town 1". It is envisaged that Large Growth Towns 1 would plan for growth up to 50,000 persons. Large Growth Towns 1 are described as, *"Key destinations, economically active towns supporting surrounding areas, located on Multi Modal Corridor in metropolitan hinterland."*

Large growth towns shall:

"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."

Naas is located adjacent to a designated Multi-Modal Transport Corridor and is served by the National Motorway Network and the rail network. The RPG state that such Large Growth Towns

with dual interconnectivity should be supported by investment in services and can be promoted as future locations for growth and act as economic drivers for the region.

2.2.2 Economic and Employment Objectives

Naas is designated as a Primary Economic Growth Town and is within the Naas / Newbridge Core Economic Area. These Primary Economic Growth Towns should be promoted as anchors for regional enterprise.

"The primary economic growth towns are the main centres of economic activity outside the city region. These have been prioritised for regional population growth and serve a pivotal role in serving their urban areas and wider suburban and rural hinterlands in terms of employment and provision of goods and services. These growth towns are located on multimodal growth corridors which provide locational advantages in terms of access to strategic rail and road networks to gateways, ports, airports."

In achieving sustainable and balanced employment within the GDA, the RPG support the improvement of jobs ratio levels in each of the constituent local authorities of the region. The RPG favour each local authority including an objective or series of measures, compliant with the RPG economic strategy, to foster employment creation and maximise the jobs potential in growth towns.

The RPG also note that Naas is designated a 'Level 2 Major Town Centre and County Town Centre' in the Retail Strategy for the Greater Dublin Area 2008 - 2016. Only Dublin City Centre within the GDA has a higher retail designation.

The development of significant employment bases within the Naas Northwest Quadrant, such as Kerry Group, are clear indicators of the success of Naas in meeting these RPG objectives. With appropriate planning other such employers can be attracted to Naas.

2.2.3 Population Projections

The population targets set out under the RPG predict that the overall population of the Greater Dublin Area will rise to just over 2.1 million by 2022. The population projections for County Kildare predict the population to rise to 252,640 persons by 2022. The Guidelines further translate the overall population projections into future demand for households. For the period 2010 to 2016, the Guidelines set out a housing unit allocation for Kildare of 8,718 units with the allocation for the period up to 2022 to be included in future reviews of the RPGs.

2.3 REGIONAL TRANSPORT POLICY

There has been a presumption in favour of sustainable transport modes and land use that supports sustainable transport patterns at all levels of transport planning. The development of Naas and the Northwest Quadrant provides an opportunity to grow the town in a sustainable, sequential manner with high quality linkages to the Sallins & Naas Train Station.

Regional transport policy has supported the development of Naas in line with NSS and RPG policies over recent decades. *Transport 21* (2006-2016) provided for key projects facilitating the development of Naas including:

- The development of the Kildare Route Project, including four-tracking between Heuston and Hazelhatch (Phase 1 complete);
- Construction of additional park and ride facilities;
- Mainstreaming of accessibility across all modes of public transport; and
- Enhanced cycling and walking facilities.

Transport 21 has been superseded by the *Transport Strategy for the Greater Dublin Area 2016 – 2035*, published by the National Transport Authority. This provides a framework for the planning and delivery of transport infrastructure and services in the Greater Dublin Area (GDA). The Strategy includes a number of specific transport upgrades which improve connectivity and support the growth of Naas, including:

- Reconfiguration of N7 from M50 to Naas to rationalise junctions and accesses to provide a higher level of service;
- Widening of the M7 between Junction 9 (Naas North) and junction 11 (M7/M9) to provide an additional lane in each direction (under construction);
- Finalisation and protection of route corridor for Leinster Orbital Route from Drogheda to Naas/Newbridge; and
- Core Bus Network Regional Corridor on N7 / M7.

In addition the Strategy includes rail upgrades in the city centre which will benefit rail connectivity between Naas and Dublin City Centre including:

- Phoenix Park Tunnel Link (now operational);
- Dart Expansion Scheme (including to Hazelhatch on the Kildare Line); and
- Dart Underground Project.

A significant number of these transport infrastructure upgrades have been provided or are in the process of being constructed and provide for the growth of the town. The key transport infrastructure within Naas which is outstanding is the delivery of Phase 2 of the Kildare Route Project. The delivery of the Kildare Route Project would increase passenger capacity to a potential capacity of 36,400 commuter passengers per day in both directions (Dublin – Sallins).

2.4 KILDARE COUNTY DEVELOPMENT PLANS

Since the publication of the NSS in 2002 there have been three Development Plan cycles within Kildare. These Development Plans have all reflected the overarching national and regional policy objectives supporting the growth of Naas. Key goals for Naas in these Development Plans have included:

- Significant population growth;
- Significant employment growth; and
- Delivery of large scale supporting infrastructure.

By way of illustrating the approach taken in successive Development Plans it is worthwhile to consider the current Kildare County Development Plan 2017 – 2023 (the Development Plan).

2.4.1 Population Targets

The Development Plan provides for the construction of 32,497 residential units to the end of April 2023 within Kildare. Naas is designated a Large Growth Town with a potential population of up to 50,000 and has a new dwellings target of 4,842 units 2016 – 2023.

2.4.2 Economic and Employment Objectives

Policy CS 5 is indicative of the approach towards employment:

“Support the development of the identified strategic growth centres of Naas, Maynooth, Leixlip and Newbridge as focal points for regional critical massing and employment growth.”

2.4.3 Infrastructure Objectives

The Development Plan also includes a number of infrastructural objectives which will support this growth including:

- MO 1 Complete the development of the third lane in each direction along the M7 including improvement of interchanges as the need arises. (under construction)
- MO 2 Complete an additional interchange along the M7 Naas by-pass, providing access to Millennium Park. (under construction)
- MO 3 Complete the upgrade and improvement of the M7 Newhall Interchange (Junction 10).
- RS 7 Secure the implementation of major road projects that are consistent with the ‘Principles of Road Development’ criteria set out in Section 5.8.3 of the Transport Strategy for the Greater Dublin Area 2016- 2035, and are identified within this County Development Plan (Table 6.1 and Table 6.2) and Local Area Plans.”

Table 6.1 includes the Sallins By-Pass R407 and the Inner Relief Road, Naas (under construction)

The ongoing delivery of the necessary infrastructure, identified within the Development Plan and partly funded by our client, presents Naas with real development potential. It is vital that the RSES maximises this opportunity afforded by the increased capacity to facilitate increased housing and employment in line with designation and land use policy.

2.5 LOCAL PLANNING POLICY - NAAS TOWN DEVELOPMENT PLAN

The Naas Town Development Plans adopted in 2005 and 2011 have been the primary local planning policy documents guiding the development of Naas for the last 14 years.

As with the County Development Plans adopted over this period, the Naas Town Development Plans have explicitly provided for the growth and development of Naas in line with its designation at National and Regional Policy level.

It was a policy of the Naas Town Development Plan 2011 - 2017 to:

“CS 4: To support the sustainable development of Naas as a focal point for regional and county economic development and employment growth.”

The Naas Town Development Plan has also explicitly supported the development of Millennium Park and the Naas Northwest Quadrant as articulated in the Naas Northwest Quadrant Masterplan 2007.

2.6 LOCAL PLANNING POLICY - NAAS NORTHWEST QUADRANT MASTERPLAN 2007

The Naas Northwest Quadrant has long been identified by Kildare County Council as a significant opportunity site for the growth and development of Naas. The lands are adjacent to the existing town and provide a natural extension to the town in addition to linking with the existing National road and rail networks.

In 2007 in accordance with the objectives of the Naas Town Development Plan 2005 the vision and local policy framework for the lands was set out in the Naas Northwest Quadrant Masterplan 2007 (herein referenced the ‘2007 Masterplan’).

The 2007 Masterplan set out a local policy framework providing for the strategic growth of Naas in accordance with the designation of Naas as a Primary Development Centre providing employment, educational facilities, local amenities and new housing. The 2007 Masterplan promoted sustainable development, high design standards and a clear rationale for the development of the lands.

The Naas Town Development Plan 2011-2017 supported the implementation of the 2007 Masterplan stating:

“The Naas Northwest Quadrant Masterplan, (2007) sets out the context, goals, objectives and structure for future development of the Northwest Quadrant to ensure that development occurs in a sustainable and planned manner. Future development within the Masterplan lands must be of high quality and should comply with urban design guidance and development management standards contained in this Plan.”

The Naas Town Development Plan 2011-2017 also re-iterated the overall vision of the 2007 Masterplan and identified the Northwest Quadrant as:

“a major opportunity to achieve the coordinated and comprehensive development of enterprise, commercial, housing and associated recreational, educational and community facilities in Naas.”

The Naas Northwest Quadrant is of regional importance and offers an opportunity to develop residential, employment and associated uses now. It is vital that the RSES is cognisant of this.

2.7 LOCAL PLANNING POLICY - NAAS LOCAL AREA PLAN

The *Draft Naas Local Area Plan* is being prepared by Kildare County Council and is currently at the pre-draft stage.

RPS Group prepared a submission in response to the Public Consultation for the Naas Local Area Plan. A review of the 2007 Masterplan was undertaken to inform the preparation of the Naas Local Area Plan. The review found that the rationale and guiding principles underpinning the 2007 Masterplan and the policies set out therein remain pertinent and appropriate.

The 2017 Naas Northwest Quadrant Masterplan was prepared and provides a more refined and appropriate framework to provide for the sustainable growth of Naas with the Northwest Quadrant remaining a key opportunity site. The overarching vision of the 2017 Masterplan is:

“to create a vibrant and bustling town expansion, wholly integrated with the fabric of Naas, offering a diverse mix of activities and providing the ideal work-life balance without the onus of long commuting. It will develop a strong employment zone and new residential neighbourhoods drawing on its natural setting to help create a community that is an extension of the town.”

In order that the LAP provides for the growth and development of Naas it is vital that the RSES provides an appropriate high level planning policy context for the development of the town.

2.8 SUMMARY OF POLICY REVIEW

This policy review has shown:

- There is a longstanding policy support at national, regional and local level for the significant population growth within Naas (Up to 40,000 - 50,000 NSS & RPG);
- Policy at all levels supports increased economic activity and employment within Naas to ensure it the town is a sustainable centre for employment;
- The development of employment and residential land uses within the Northwest Quadrant is explicitly provided for in local planning policy documents and accords with regional and national land use and transport planning policy;
- The necessary infrastructure to support the development of Naas and the Northwest Quadrant has been identified and its provision is ongoing. Significant works, involving large scale public and private sector investment, have already been undertaken; and
- Local planning policy provides a detailed vision for the sustainable development of the Northwest Quadrant.

3 INFRASTRUCTURAL INVESTMENT

The statutory designation of Naas as a Primary Growth Centre (NSS) and Large Growth Town 1 (RPG) and the local planning policy based on this has underpinned significant public and private investment in delivering the necessary infrastructure to enable Naas develop in accordance with long standing planning policy. Significant progress has been made in bringing forward the vision set out in national, regional and local planning policy documents.

- Enabling infrastructure (roads and services) within the Northwest Quadrant is in place (total cost €53million);
- Planning and subsequent funding (through a combination of public and private contributions) for the M7 Osberstown Interchange (directly serving the Naas Northwest Quadrant) and the R407 Sallins Bypass has been secured and the interchange is currently under construction;
- M7 Naas to Newbridge Motorway Widening Scheme is now being advanced by Kildare County Council and is scheduled to be completed in 2019. (total cost of all M7 and Sallins Bypass works c. €110million);
- Phase 1 of the Kildare Route Project has been delivered; and
- Upgrade of Osberstown Wastewater Treatment Plant from 80,000PE to 130,000PE (total cost in excess of €80million).

An outstanding infrastructural upgrade to be completed is the Kildare Route Rail Project. The Kildare Route Project provides for the 4 tracking of the existing rail line from Heuston to Kildare and the electrification of the line to provide for increased passenger capacity and Dart services. The Kildare Route Project will increase passenger capacity to a potential capacity of 36,400 commuter passengers per day in both directions (Dublin – Sallins). As noted above Phase 1 of the project extending 4 tracking from Heuston to Hazelhatch, the station immediately north of Sallins and Naas has been completed.

The NTA *Draft Integrated Implementation Plan (2019-2024)* includes the provision of high-frequency electrified services to Hazelhatch (or further southwards), on the Kildare Line as part of the DART Expansion Programme.

The *Transport Strategy for the Greater Dublin Area 2016 – 2035* support directly or are directly integrated with plans to the Kildare Route Rail Project including the electrification of the rail line to Hazelhatch and the Dart Expansion Programme, including Dart Underground.

The provision of phase 2 of the Kildare Route Project shall:

- Maximise the benefits associated with planned Rail and Dart upgrades;
- Enhance commuter and intercity rail services; and
- Support the sustainable development of Naas as an employment and residential centre.

The Local Infrastructure Housing Activation Fund (LIHAF) is a fund under Rebuilding Ireland: An Action Plan for Housing & Homelessness to provide public off-site infrastructure to relieve critical infrastructure blockages and accelerate the delivery of housing on key development sites in urban areas of high demand for housing. The Naas Inner Relief Road was granted €6m under this scheme to complete the Blessington Road to Dublin Road link which is currently outstanding.

Additionally, within the Northwest Quadrant the required primary infrastructure to support further development is in place:

- Sufficient capacity in water, foul, drainage, power and gas networks, together with the availability of high speed broadband and telecommunications to cater for a wide range of uses;
- High profile commercial and R&D development, most notably the Kerry Group Global Technology and Innovation Centre employing approximately 1,200 no. people;
- Residential development is progressing at 'Finlay Park', in which approximately 60 no. residential units are under construction; and
- Planning permission granted for a new secondary school (Reg. Ref. 16/434). It is envisaged that Naas Community College shall occupy the site.

Our client has provided significant funding for the delivery of the Northwest Quadrant infrastructure, including in excess of €16 million for the design and planning phases and towards the construction of the M7 Millennium Interchange and the Sallins By-pass. Our client has also funded the Distributor Road and drainage works within the Northwest Quadrant.

Such a level of public and private investment demands consistent and appropriate policies be put in place to provide for the development of Naas and the maximisation of benefits associated with such investment.

3.1 INFRASTRUCTURE UPGRADE TO SUPPORT GROWTH OF NAAS

The delivery of large scale infrastructure serving Naas has been undertaken with the clear intention of such development supporting population and employment growth within Naas and within the Northwest Quadrant.

The An Bord Pleanála Inspector's Report for the M7 Osberstown Interchange and R407 Sallins Bypass Scheme (ABP Reg. Ref. 09.HA0046 M7, 09.MA0013 and 09.KA0031) clearly sets out that that delivery of such infrastructure was in accordance with planning policy and to support the further development of Naas. The Inspector's Report states:

"I consider that the Osberstown Interchange Sallins Bypass Scheme is supported by a range of policies at national, regional and local level."

"In relation to policies at a national level, I note in particular the provisions of the National Spatial Strategy and the fact that the development facilitates access to zoned lands within the primary development cluster from the national road network."

"The scheme provides for better regional connectivity, benefits human beings and the environment of Sallins in particular and is supported by development plan policy. The relief of congestion is a significant issue. The interchange benefits economic development in particular. However, the benefits of the interchange are reinforced and optimised by the construction

of the Sallins Bypass, which would allow for development of the Naas in a more sustainable manner¹

3.2 SUMMARY OF INVESTMENT REVIEW

This review has shown:

- There has been significant public and private investment in delivering large scale infrastructure upgrades within and proximate to Naas.
- This investment has been made on the basis of:
 - Long standing planning policy objectives supporting the sustainable growth of the town;
 - The infrastructure upgrades being provided specifically to ensure sufficient assimilative capacity to provide for the growth of Naas including the Northwest Quadrant.
- The delivery of Phase 2 of the Kildare Route Project is one significant infrastructure upgrade yet to be delivered.

The level of public and private investment made demands consistent and appropriate planning policies for the on-going development of Naas.

¹Our emphasis

4 DRAFT REGIONAL SPATIAL AND ECONOMIC STRATEGY

The Draft RSES follows on from the publication in 2018 of the NPF. The NPF replaces the NSS and is now the primary articulation of national planning policy within the state. The NPF provides the primary policy context for the RSES and is considered below with specific regard to the development of Naas.

4.1 PROJECT IRELAND 2040 NATIONAL PLANNING FRAMEWORK

4.1.1 Managing Population Growth

The key factor shaping the NPF is that by 2040 there will be an additional one million people living and an additional 660,000 people working in Ireland. The NPF provides a sustainable land use strategy to cater for such growth.

The NPF sets out guiding principles for future growth and economic development of towns such as Naas requiring that there be an integrated approach which exploits local strengths and secures employment opportunities to drive self-sustaining, rather than mainly housing-led development.

With regard to housing the NPF recommends that development should be primarily based on employment growth, accessibility by sustainable transport modes and quality of life, rather than unsustainable commuting patterns. As such the NPF is concerned more with the pattern of development rather than exact numbers. The NPF states:

*'In setting overall targets for future growth, it is a pattern of development that is being targeted, rather than precise numbers. From a long-term, national perspective, the targeted location, relative scale and proportionality of growth will assist in monitoring and assessing delivery and performance.'*²

The NPF does recognise that larger urban centres have particular strengths in attracting investment and driving employment growth. National Policy Objective 5 seeks to:

"Develop cities and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment and prosperity."

The NPF therefore provides for the growth of Naas as a sustainable centre with a balanced growth of employment and population with sufficient scale to attract foreign direct investment.

4.1.2 Zoning and Development of Land

The National Planning Framework sets out a two-tier approach to land zoning. Tier 1 comprises lands that are able to connect to existing development services, i.e. road and footpath access including public lighting, foul sewer drainage, surface water drainage and water supply, for which there is service capacity available, and can therefore accommodate new development. These lands

² Our emphasis

will generally be positioned within the existing built-up footprint of a settlement or contiguous to existing developed lands.

The Naas Northwest Quadrant are considered to be Tier 1 Serviced Zoned Lands as defined in the NPF.

4.1.3 Application of NPF to Naas

The primary focus of the NPF is on logical growth aligned with embedded investment. The actual growth in the population of Naas is secondary to the outcome of the NPF provided that the population growth is sustainable and linked to infrastructural and social capacity.

Naas Northwest Quadrant which is linked with Naas town centre, served by significant infrastructure and linking with Sallins and the train station is a logical pattern of development. Naas needs to be understood as a town which has developed logically to date. Naas now has a range of facilities but also a need to continue to develop out good locations such as Millennium Park, to make the most cost effective use of this infrastructure.

The NPF supports the growth of town such as Naas and lands such as the Northwest Quadrant which have the capacity to deliver, sustainable integrated population and employment growth and have supporting infrastructure in place.

It should be noted that Kildare County Council also supports the continued growth of Naas. Kildare County Council in their submission to the NPF dated 31st March, 2017 states:

“Naas is ideally placed to play a strong role in the future growth of the Dublin City Region. It is strategically positioned and has high quality connections to Dublin and other centres, whilst also supporting and servicing a wider local economy. Its connectivity to Dublin, Waterford, Cork and Limerick along a high quality transportation corridor that includes a rail line, motorway network and strong bus routes presents a significant opportunity for Naas and for the region. It is important that the NPF and RSES acknowledge the role of Naas as a strategic economic centre within the Dublin City Region, so that economic growth can be aligned with the existing high quality labour market that exists in Naas Town and in mid-Kildare and with the attractive urban and rural setting that offers significant quality of life benefits.....

The major employment district in the North West Quadrant (Millennium Park) in proximity to the Dublin – Cork rail line, presents a significant opportunity to align new employment with an existing centre of population within the Dublin City Region. Identifying Naas as a key employment destination within the region will maximise the value of established physical and social infrastructure and connections; and build on established synergies with other key towns.”

It is imperative that the RSES reflects long standing planning policies together with the central tenets of the NPF, in facilitating employment and population growth in towns such as Naas. These have the infrastructural capacity to provide regionally significant sustainable urban development.

4.2 DRAFT RSES REVIEW

In considering the future growth of Naas RSES objective **RPO 4.2** is key:

*"Infrastructure investment and priorities shall be aligned with the **spatial planning strategy** of the Draft RSES. All residential and employment developments should be planned on a phased basis in collaboration with infrastructure providers so as to ensure **adequate capacity for services (e.g. water supply, wastewater, transport, broadband)** is available to match projected demand for services and that **the assimilative capacity of the receiving environment is not exceeded.**"³*

The RSES must ensure Naas can grow in a way which is planned and exploits infrastructural investment and the assimilative capacity of the receiving environment. The implications of this requirement are set out below.

4.2.1 RSES Settlement Typology

The Draft RSES sets out a settlement strategy as shown in **Figure 4.1**. It can be seen that Dublin City and Suburbs is designated as the most important urban centre. At a level below this are Dundalk, Drogheda and Athlone which are designated 'Regional Growth Centres'.

³ Our emphasis

Settlement Strategy

Settlement typology

The draft RSES identifies an asset-based settlement typology to provide guidance for local authorities in the preparation of Core Strategies, in their City and County Development plans and to ensure sustainable compact urban growth at a level appropriate to their position in the hierarchy

Dublin city and suburbs

Support the consolidation and re-intensification of infill, brownfield and underutilised lands with 50% of all new homes to be provided in the existing built up area of Dublin City and Suburbs in tandem with the delivery of key infrastructure to achieve a population of 1.4 million people by 2031

Regional Growth Centres

Support urban regeneration and the delivery of strategic development areas in tandem with key enabling infrastructure, with at least 30% of all new homes to be provided in the existing built up areas to enable Athlone, Drogheda and Dundalk as significant regional drivers.



Figure 4-1: Regional Growth Strategy⁴

Regional Growth Centres are defined as:

"Socio economic functions: International business core with strong diversified economic base with access to international markets. High density retail and service hub with high quality arts, culture and leisure offer. Large regional centres with strong economic base and good connectivity to Dublin and its markets. High level of service and retail functions playing a key role for a wide catchment."

⁴ Source Basemap: Draft RSES

Transport Profile: Self-sufficient settlements with higher rates of internal trips and public transport connections to Dublin and other centres.”

Despite Naas clearly functioning as a Regional Growth Centre it is not designated as such. Naas is instead designated a ‘key town’ in the Draft RSES. The failure to designate Naas as a Regional Growth Centre is a repudiation of twenty years of land use and transport planning policy and infrastructural investment.

Such an approach is particularly inexplicable in the current well understood circumstance where there is an acute shortage of housing stock available and the provision of infrastructure within Naas, at very significant cost, to support increased population and housing.

The location of Naas on the M7/M9 corridor and the national rail network also re-inforce the need for Naas to be designated a Regional Growth Centre. The population catchment of this corridor is approximately 2 million people living in the major settlements. In 2017 the Cork/Limerick/Waterford – Dublin rail corridor catered for 32,000 passengers daily. This is more than 23% higher than the 26,000 passengers catered for by the Dublin-Belfast corridor. Road traffic on the M7 at Naas is also greater than that on the M1 corridor at Drogheda. The Annual Average Daily Traffic (AADT) on the M7 is approximately 70,000 as compared to approximately 40,000 AADT on the M1. These figures indicate that the M7/M9 corridor should be afforded at least the same level of recognition as the M1 corridor in terms of designation of regional growth centres.

Given the failure to designate Naas as a Regional Growth Centre and with no designated Regional Growth Centre surrounding Dublin City within counties Kildare, Wicklow, Laois, Meath or Offaly a re-consideration of the settlement strategy is urgently required.

4.2.2 RSES Policy Objectives for Naas

The limited Regional Policy Objectives pertaining to Naas within the Draft RSES are included below.

“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.”

This objective is welcome and positive but does not provide sufficient ambition or direction for the development of Naas.

“RPO 4.34: Support the use of the Grand Canal for amenity, recreation and sustainable transport purposes.”

This objective is again positive, but fails to embrace the opportunities for Naas to be a vibrant residential and employment centre of regional and national importance.

There is a clear need for more detailed policy objectives within the RSES providing for the growth of Naas and the Northwest Quadrant given the existing infrastructure and assimilative capacity of the town.

4.2.3 Population Projections

The Draft RSES provides population projections to county level only. This is set out for Kildare in Table 4.1.

Table 4-1: Population Projection - Co. Kildare

Local Authority	2016	2026 Low – 2026 High	2031 Low – 2031 High
Kildare	222,500	249,000 - 254,000 (12% - 14% increase)	259,000 - 266,500 (16% - 20% increase)

These projections are to be further broken down by Local Authorities in the preparation of the core strategies of their development plans. Objective RPO 4.22 provides guidance on the preparation of the core strategies stating:

“Core strategies in Local Authority development plans shall support objectives to achieve a minimum of 30% of housing in key towns by way of compact growth through the identification of key sites for regeneration.”

In the case of County Kildare, there are two designated Growth Towns within the county, Maynooth and Naas. No guidance is provided within the Draft RSES regarding the allocation of population growth within these towns. The outcome of applying the 30% requirement set out in the Draft RSES and splitting it equally between Maynooth and Naas is shown in Table 4.2. However it is not clear how the guidance provided in the Draft RSES will be applied and the allocation for Naas may be greater or less than that shown.

Table 4-2: Estimated Housing and Population Projections

Town	2016	2026 Low – 2026 High	2031 Low – 2031 High
Kildare Population	21,393	3,975 – 4,725	5,475 - 6,600
Housing Units*		1,663 - 1,977	2,291 – 2,762

*Based on an average household size of 2.39 as per Kildare County Development Plan 2011 – 2017 projection for 2023

The above estimates are indicative of the lack of certainty regarding the future growth of Naas. Such uncertainty is contrary to good planning. Furthermore the possibility of the level of growth within Naas being restricted by artificial limits has the potential to undermine the longstanding planning policy and infrastructural investment.

The opportunity for Naas to act as a regionally significant population centre dictates that the RSES should provide clear guidance on the future population targets for the town in order to ensure that artificial constraints are not imposed and the infrastructural and assimilative capacity of the town is exploited.

4.2.4 Draft RSES Review Summary

In summary the Draft RSES:

- Recognises the need to align infrastructure investment and priorities with the spatial planning strategy;
- Is not sufficiently cognisant of the large scale private and public infrastructural investment and resultant assimilative capacity and provision of Tier 1 lands in Naas;
- Is inconsistent with planning policy at National, Regional and Local level since 2002 in its failure to designate Naas a Regional Growth Centre;
- Is contrary to the vision articulated by Kildare County Council for the growth of Naas in successive Development Plans and Town Plans and their submission to the NPF; and
- Fails to provide certainty or adequately facilitate the delivery of significant housing in the short term in Naas at a time of profound housing shortages.

5 RECOMMENDATIONS

Naas has benefitted from the designation of Regional Growth Centre since 2002. Naas has grown over this period. The town is now a large sustainable urban centre with a positive jobs to resident workforce ratio.

The consistent planning policy approach has also enabled significant infrastructural investment. The infrastructure and utilities to facilitate the further growth of Naas in line with this designation are now largely in place or under construction including:

- M7 Millennium Park Interchange;
- Sallins By-pass;
- Third lane M7;
- Osberstown Waste Water Treatment Plant; and
- Enabling infrastructure (roads and services) within the Northwest Quadrant.

Failure to fully exploit the opportunities associated with this assimilative capacity would be contrary to the central tenet of sustainable planning as set out in the NPF and RSES.

Any alteration of the designation of Naas and artificially limiting growth of the town when the infrastructure and economic conditions to allow Naas meet the long established policy objectives for the town is contrary to proper planning and will hinder the provision of housing with the GDA at a time of profound need.

The RSES should provide for the growth and development of Naas in a manner that is consistent with national, regional and local planning policy pertaining to Naas since 2002.

In providing this consistency the RSES should address the following particular items.

5.2 SETTLEMENT TYPOLOGY - DESIGNATION OF NAAS

In view of the strategic location of Naas on the national motorway and rail network and provision of infrastructure at a very significant public and private cost it is necessary that the RSES provides for the growth of Naas as a population and employment centre of regional importance. The designation of Naas as a 'key town' in the Draft RSES should be amended.

Naas should be designated a Regional Growth Centre within the RSES.

In line with this designation the RSES shall provide for significant rates of population growth, coupled with investment in services, amenities and sustainable transport within Naas.

In order to ensure Naas fulfils the role of a regional growth centre the following policy objectives for Naas should be included in the RSES:

- Support the development of existing designated lands within Naas including the Northwest Quadrant to optimise the potential of these lands adjacent to the town and the opportunity

to facilitate a mixed residential settlement with supporting services and facilities which will support the commercial core of the town, reinforce neighbourhood identity and enhance the physical character of the area.

- Promote the expansion of the existing enterprise ecosystem in Naas and creation or expansion of distinct industrial specialisms including agri-food and equine sectors that have developed through collaboration with the relevant enterprise agencies.
- Enhance the role of Naas as a strategic employment centre on the M7 & Dublin-Cork/Limerick Rail Transport Corridor.
- Improve accessibility and sustainable mobility in the town centre and linking with Sallins and Naas Train Station by enhancing modal choice through integration of rail, bus and taxi services.

5.3 HOUSING AND POPULATION PROJECTIONS

There is significant existing demand for housing within Kildare and particularly within Naas. Large scale infrastructural investment has been made on the basis of longstanding policy objectives to accommodate 40,000 – 50,000 people within Naas and the necessary infrastructure to support a significant increase in the population of Naas is in place.

The abandonment of these population objectives precisely when the infrastructure to support the population is in place is contrary to proper planning and undermines public confidence in the forward planning process. It is considered that in order to address the acute housing shortage that the provision of a quantum of housing in line with longstanding policy objectives and supported by existing infrastructure should be provided for in the RSES.

The RSES should explicitly provide for significant growth in population and employment within Naas in order to exploit the opportunities and assimilative capacity associated with the large scale infrastructural upgrades.

The RSES should include the following vision:

The vision provided in the RSES is that Naas will act as the lead town for future development in the region to become a Regional Growth Centre with a long term population target in the Region of 40,000.

5.4 INFRASTRUCTURAL INVESTMENT

Much of the infrastructure required for a significant growth in the resident and working population of Naas is now in place or under construction. An outstanding infrastructural upgrade is the completion of the Kildare Route Rail Project. The provision of phase 2 of the Kildare Route Project shall:

- Maximise the benefits associated with planned Rail and Dart upgrades;
- Enhance commuter and intercity rail services; and
- Support the sustainable development of Naas as an employment and residential centre.

It is considered that the following objective should be included in the RSES.

Support the completion of the Kildare Route Project and the provision of strategic park and ride facilities at Sallins and Naas Train Station.

5.5 CONCLUSION

We would formally request that the following amendments to the Draft RSES be made:

Naas should be designated a Regional Growth Centre within the RSES.

The RSES should include the following vision: **The vision provided for in the RSES is that Naas will act as the lead town for future development in the region to become a Regional Growth Centre with a long term population target in the Region of 40,000.**

In order to ensure Naas fulfils the role of a regional growth centre the following policy objectives for Naas should be included in the RSES:

- Support the development of existing designated lands within Naas including the Northwest Quadrant to optimise the potential of these lands adjacent to the town and the opportunity to facilitate a mixed residential settlement with supporting services and facilities which will support the commercial core of the town, reinforce neighbourhood identity and enhance the physical character of the area.
- Promote the expansion of the existing enterprise ecosystem in Naas and creation or expansion of distinct industrial specialisms including agri-food and equine sectors that have developed through collaboration with the relevant enterprise agencies.
- Enhance the role of Naas as a strategic employment centre on the M7 & Dublin-Cork/Limerick Rail Transport Corridor.
- Improve accessibility and sustainable mobility in the town centre and linking with Sallins and Naas Train Station by enhancing modal choice through integration of rail, bus and taxi services.
- Support the completion of the Kildare Route Project and the provision of strategic park and ride facilities at Sallins and Naas Train Station.

