

Simon Musial

From: Valerie Brennan <valerie.brennan@rpsgroup.com>
Sent: 23 January 2019 14:43
To: RSES
Cc: Leah Kenny
Subject: Submission to Draft RSES as it concerns lands located at Moygaddy, Maynooth, County Kildare
Attachments: MH14036_Draft RSES for EMRA Submission_F01_230119.pdf
Importance: High

Dear Sir / Madam,

RPS Group Ltd. has been instructed by Sky Castle Limited whose address is Ground Floor, 75 St. Stephen's Green, Dublin 2, D02 PR50 to prepare the attached Submission in relation to the Draft Regional Spatial and Economic Strategy for the Eastern and Midlands Regional Assembly (Draft RSES).

I would greatly appreciate if you could please acknowledge receipt of the attached Submission by return of e-mail.

We look forward to hearing from you.

Yours sincerely,

Valerie Brennan
On behalf of Leah Kenny, Director of Planning, RPS

Valerie Brennan

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By e-mail to: rses@emra.ie

Date: 23 January 2019

Our Ref: MH14036
File Ref: 11.0 Draft RSES for EMRA Submission

Re: Submission to the Draft Regional Spatial and Economic Strategy for the Eastern and Midland Regional Assembly as it concerns lands located at Moygaddy in the northern environs of Maynooth, County Kildare

Dear Sir / Madam,

Introduction

RPS Group Ltd. has been instructed by Sky Castle Limited whose address is Ground Floor, 75 St. Stephen's Green, Dublin 2, D02 PR50 to prepare this submission in relation to the Draft Regional Spatial and Economic Strategy for the Eastern and Midlands Regional Assembly (Draft RSES). This submission has been prepared pursuant to the invitation by EMRA for interested parties to make submissions to the content of the Draft RSES which has been on public display from 5 November 2018 to 23 January 2019 inclusive.

The purpose of this submission is to comment on a number of matters of detail within the Draft RSES which concern the need for our Client's lands at Moygaddy to be explicitly recognised as being a regionally significant growth area that will complement the northern expansion of Maynooth, County Kildare. The specific subject matter of this submission concerns Section 4.6 and Table 5.1 of the Draft RSES. The key rationale for the making of this submission is due to the fact that the subject lands:

- Concern an area of approximately 96 ha. of available land that is currently in a pre-planning phase for a variety of uses including employment related uses and a mix of complementary uses.
- Are currently zoned for a variety of uses in the Meath County Development Plan 2013-2019 including employment and associated complementary uses that provide for synergies with the vibrant university town of Maynooth.
- Form a key part of the proposed Maynooth Outer Orbital Route (MOOR) for which a Part 8 Agreement is already in place and which is a key driver to achieving Maynooth's designated role in the current regional settlement hierarchy as envisaged in the Draft RSES.

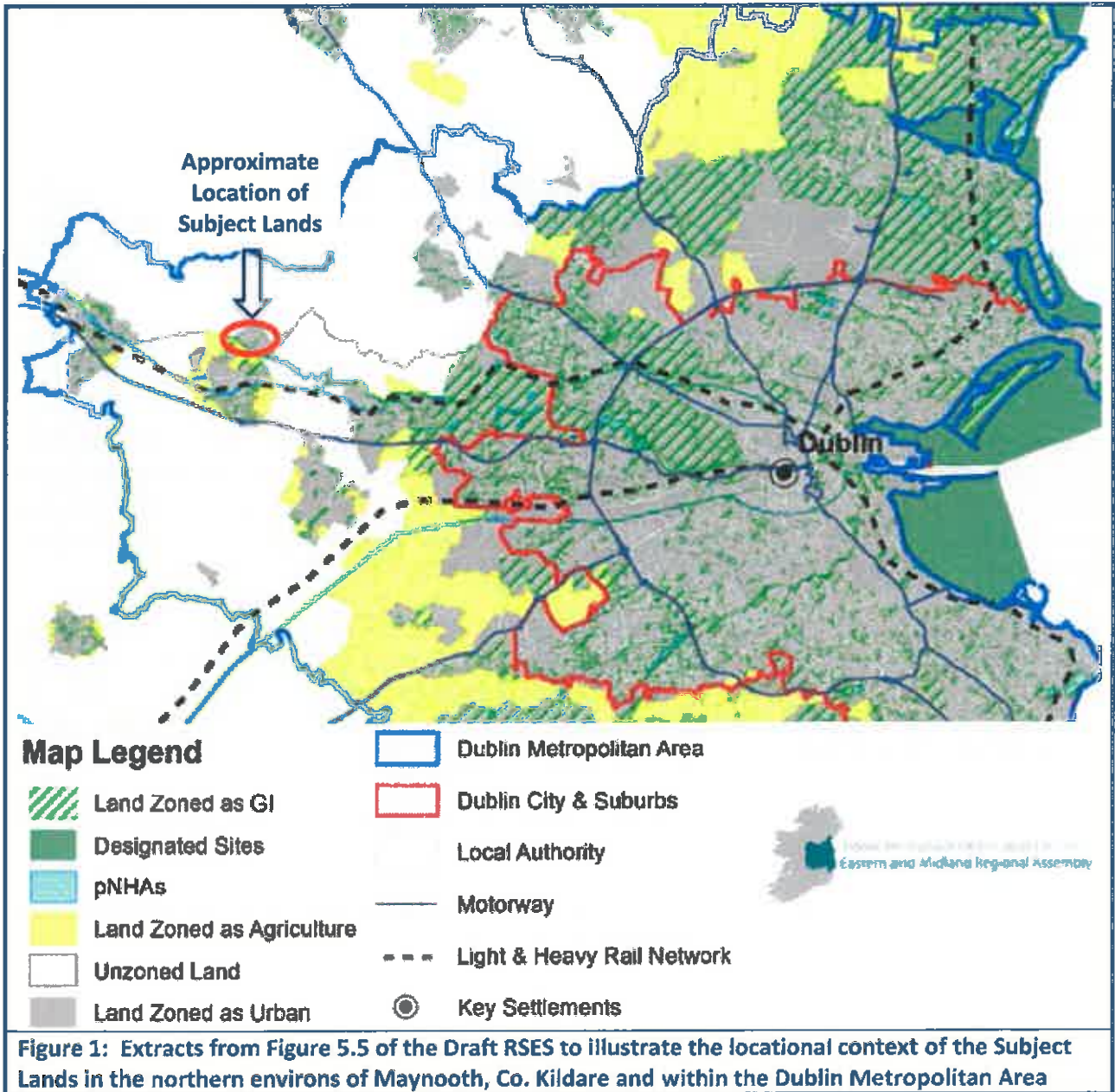
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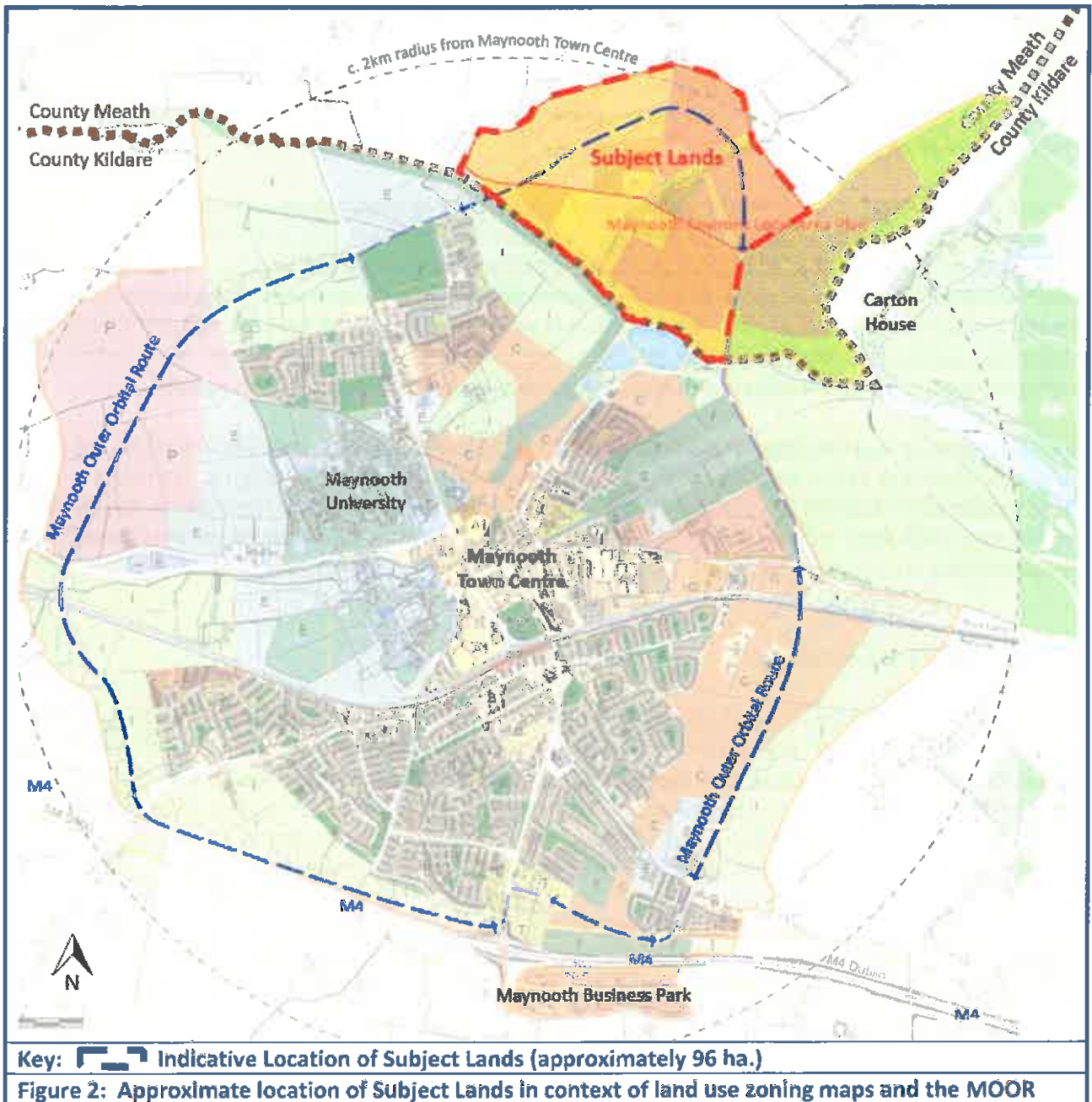


The Subject Lands

The subject lands concern a significant landholding that is located at Moygaddy in the northern environs of Maynooth. As illustrated in Figure 1, the lands are already identified in the Draft RSES as being located within the Dublin Metropolitan Area and constituting "Land Zoned as Urban". All of the subject lands are under the control and authority of Sky Castle Limited, which, on the instruction of the executors of the Murphy Estate, has the authority to instruct relation to the lands. While the subject lands are located within the administrative boundary of County Meath, they are contiguous to the administrative boundary of County Kildare and therefore form an integral part of the northern expansion plans for Maynooth town.



As indicated by Figure 2, the entirety of the subject lands are currently zoned for mix of uses including employment, tourism, residential and neighbourhood centre uses that are proposed to be accessed and permeated by the MOOR. In this context and in the interests of sustainably development, it is noted that an element of residential use provision is an important component to allow for the orderly development of the northern environs of Maynooth. The subject lands have the necessary attributes to enable locally based employment related uses to be provided for the local knowledge based economy of Maynooth beside both new and existing homes in a manner where these uses are complemented by local amenities.



The MOOR has been planned for in excess of 10 years as it allows for the appropriate development of Maynooth environs and the subject lands at Moygaddy. It was a specific objective of the Maynooth Environs Local Area Plan 2009-2015, the core broad objectives of which were extended by Variation No. 2 of the Meath County Development Plan 2013-2019¹. Significantly, a Part 8 Agreement is already in place between Meath and Kildare County Councils to allow for the development of this new cross county boundary route.

National Planning Policy Context

Published in May 2018, the National Planning Framework – Project Ireland 2040 (NPF) is the primary articulation of spatial, planning and land use policy in Ireland. One of the key considerations guiding the NPF is future growth. The NPF projects that by 2040, there will be an additional one million people living in Ireland and an additional 660,000 people working in Ireland. The NPF seeks to provide a sustainable means of providing for such growth.

The NPF concedes that in the past, the rapid growth experienced by many towns in the Mid-Eastern Region, was mainly driven by housing, rather than jobs centred development. In the context of the subject submission, it is significant to note that the National Policy Objective 5 (NPO 5) is 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.”* In addition, it is noted that Section 10.2 of the NPF states that: *“An integrated approach to the development of... towns is a priority, but playing to local strengths and securing employment opportunities to drive self-sustaining, rather than mainly housing-led development.”*

The NPF therefore seeks to ensure that spatial, economic and employment needs are developed regionally and that towns are driven to be self-sustaining in a manner that plays into local strengths. The local strengths of the subject lands includes their proximity to Maynooth University, their zoned lands status, their planned use for the realisation of the MOOR and their potential for the development of employment and complementary mixed uses.

Regional Planning Policy Context

As required under Section 24(4) of the *Planning and Development Acts 2000-2018*, the RSES is the key regional planning policy document for the whole of the Eastern and Midland Region for the period 2019-2031. Its purpose is to support the implementation of national government policies and to set out a framework for local economic development and the spatial planning of the region. The Draft RSES is therefore intended to be a strategic plan that identifies regional assets, opportunities and pressures and provide appropriate policy responses in the form of Regional Policy Objectives.

The Draft RSES identifies Maynooth as a ‘Metropolitan Key Town’. Metropolitan Key Towns are described as being *“Large economically active county towns, with high quality transport links that play an important service role for their catchments and that have the capacity to act as growth drivers to complement Dublin and the Regional Growth Centres.”*

¹ Ref. Volume 5 – Maynooth Environs Written Statement

Section 4.6 of the Draft RSES describes Maynooth as being a “vibrant university town” and notes that “the Maynooth Business Park is located south of the M4 motorway and is one of the main employment areas”. It recognises Maynooth as being “important in a regional and in a county context” and having “the capacity and future growth potential to accommodate above average growth in the Region with the requisite investment in employment creation, services, amenities and sustainable transport”. Indeed, the recognised importance of Maynooth in terms of employment creation is warmly welcomed by our Client.

The Draft RSES sets out two specific Regional Policy Objectives (RPOs) for Maynooth, namely:

“RPO 4.27: Support the continued development of Maynooth, co-ordinated with the delivery of strategic infrastructure including DART expansion to support future population growth and build on synergies with Maynooth University to promote research and economic development opportunities.

RPO 4.23: Key Towns shall act as economic drivers and provide for strategic employment locations to improve their economic base by increasing the ratio of jobs to workers.”

In the context of the subject submission and in terms of connectivity, it is also noted that a strategic outcome of the Draft RSES is integrated transport and land use planning. More specifically it is to: *“Promote best use of Transport Infrastructure, existing and planned, and promote sustainable and active modes of travel to ensure the proper integration of transportation and land use planning (NSO 2, 6, 8, 9).”*

Requested Specific Updates to Section 4.6 and Table 5.1 of the Draft RSES regarding Maynooth

We respectfully recommend that our Client’s lands at Moygaddy are specifically included in the written statement of the RSES. Our Client is seeking explicit recognition in the RSES of the development potential of the Moygaddy lands for employment and other complementary mixed uses in the short to medium term. In order to achieve this, we request that the below additional text (**highlighted in red**) be included as follows:

Section 4.6 of the Draft RSES:

*“Growth areas include the Railpark lands, with significant residential development potential located to the south east of the town, with potential links along the Royal Canal towpath to the town centre. **The Railpark lands are subject to LIHAF funding for a new relief road and bridge over the railway line. The Moygaddy lands to the north of the town are strategically suitable for employment, residential and other complementary uses and their development will also allow for the delivery of the Maynooth Outer Orbital Route.** The further development of agricultural lands at Crewhill and Newtown would provide for significant residential development, extending the boundary to the north and west of the town. It is also proposed to develop a new Research and Technology Park adjoining Maynooth University campus and subject to a new road linking the south and west of the town.*

Table 5.1 of the Draft RSES:

<i>Corridor</i>	<i>Residential</i>	<i>Employment / Mixed Use</i>	<i>Phasing / Enabling infrastructure</i>
<p>North-West corridor (Maynooth/ Dunboyne commuter line / DART) Population capacity Short 24,000 Medium 10,000 Long 3,000 Total 37,000</p>	<p>Maynooth – Significant strategic residential capacity at Railpark lands and to the north and west of the town near Maynooth University and at Moygaddy</p>	<p>New Research & technology Park adjoining Maynooth University Employment & Mixed uses at Moygaddy</p>	<p>Short to Medium term LIHAF relief road and bridge, road upgrades including the Maynooth Outer Orbital Route, sewer connection, LUAS extension to Maynooth.</p>

Conclusion

The shared administrative responsibility for the development of Maynooth highlights the need for the RSES to provide strategic regional guidance to both Kildare County Council and Meath County Council in respect of realising the development potential of Maynooth.

In terms of EMRA’s purpose, it is submitted that the RSES needs to be explicit about particular growth areas that are strategically and regionally important, particularly, transboundary lands within the administrative area of both Kildare and Meath County Councils. To date there is no specific mention of the Moygaddy lands in the draft RSES despite the significant attributes of the lands which include but are not limited to:

- Their strategically important regional location, their capacity to drive self-sustaining development, and their wholesale alignment with RPO 4.23 of the Draft RSES.
- Their suitability for the future development of employment, residential and other complementary mixed uses arising from their zoned lands status, their availability for development and their pre-planning phase status.
- Their role in enabling the delivery of the MOOR for which a Part 8 Agreement is already in place, all of which achieves the realisation of integrated transport and land use planning.

We respectfully request that the specific updates to the wording of Section 4.6 and Table 5.1 of the Draft RSES as it concerns the Metropolitan Key Town of Maynooth as set out in this submission be incorporated into the written statement of the RSES. We trust that EMRA will consider the validity of the points raised in this submission as they concern spatial and economic policy and sustainable development in the preparation of their finalised RSES.

Our client would welcome the opportunity to give any further information or detail in respect of this submission, and to meet with EMRA during the course of the finalisation of the RSES for EMRA if deemed appropriate.



If you require any further information or clarification of the information contained in this submission, please do not hesitate to contact the undersigned.

Yours sincerely,

A handwritten signature in black ink that reads 'Leah Kenny'.

Leah Kenny
Director of Planning

