

## Heather Cooke

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**From:** Stephen Purcell <stephen.purcell@futureanalytics.ie>  
**Sent:** 23 January 2019 15:45  
**To:** RSES  
**Subject:** Kaymed Woolfson, t/a Kaymed - Dublin Road, Kilcullen, Co. Kildare - Submission to EMRA Draft RSES  
**Attachments:** 2-0667 Kaymed\_Kilcullen\_Submission to EMRA Draft RSES.pdf

Mr. Jim Conway  
Director  
Eastern & Midland Regional Assembly  
3rd Floor North  
Ballymun Civic Centre  
Main Street  
Ballymun  
Dublin  
D09 C8P5

Good afternoon Jim,

I trust you are keeping well.

On behalf of Kayfoam Woolfson, trading as Kaymed (Dublin Road, Kilcullen, Co. Kildare), Future Analytics Consulting (23 Fitzwilliam Square South, Dublin 2), Chartered Town Planning and Development Consultants, wish to submit the attached submission. The submission relates to the public consultation of the Draft Regional Spatial and Economic Strategy for the Eastern and Midland Region published by the Eastern and Midland Regional Assembly. The lands in question are adjoining the existing business premises of this anchor employer for the settlement of Kilcullen, and represent a centrally located and accessible holding which is of strategic importance for the timely delivery of much needed affordable housing to accommodate the existing and future population of Kilcullen. Indeed, Kaymed's continued operation in Kilcullen is at genuine risk owing to BREXIT, and this submission sets out in detail the importance of the lands in question for the future of this settlement. Kilcullen has been performing better than its peers in recent years, from a socio-economic perspective.

We look forward to an acknowledgement receipt relating to this submission.

Given the important role that the subject lands can play for the future of Kilcullen, should the Eastern and Midland Regional Assembly find it beneficial to meet with Kaymed – **as the largest employer in the settlement** – to discuss their ambitions for this project and the prompt delivery of much needed housing, please do not hesitate to make contact with me.

Many thanks in advance for your consideration of this submission.

Yours sincerely,

Stephen

**Stephen M. Purcell**

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Submission to the

# EASTERN AND MIDLAND REGIONAL ASSEMBLY

On the Draft Regional Spatial and Economic  
Strategy for the Eastern and Midland Region

Submitted for Kayfoam Woolfson, trading as Kaymed

kaymed

Prepared by

 **Future Analytics**  
Planning | Research | Economics

January 2019





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In order to remain viable in Kilcullen with the realities of BREXIT looming, Kaymed needs to invest significantly and in turn fully explore all sources of funding including divesting of adjacent unused lands.



# EXECUTIVE SUMMARY

The following are the key points of this submission to the Eastern and Midland Regional Authority on the Draft Eastern and Midland Regional Spatial and Economic Strategy (EMRSES) on behalf of Kayfoam Woolfson, trading as Kaymed as outlined in detail in the subsequent sections:

- >> In order to remain viable in Kilcullen with the realities of BREXIT looming, Kaymed needs to invest significantly and in turn fully explore all sources of funding including divesting of adjacent unused lands. This includes the use of the lands to accommodate employees. This is actively being pursued alongside the implementation of plans to upgrade process technologies, and upskilling of employees;
- >> Kaymed supports Regional Policy Objectives RPO 6.31 and 6.32 of the EMRSES, which recognise anticipated economic risk and structural changes (EMRSES, 2018, p.109), however these do not proactively provide for resilient business strategies. Kaymed submits that the EMRSES should include Regional Planning Objective that facilitates potential “pivot strategies” for BREXIT affected business, including relocations and rezonings of land within urban centres provided the re-zoning is to a use typical of a ‘town centre’ and in line with overall objectives of county development plans;
- >> Kaymed supports all measures to achieve the stated ‘growth enablers’ for the ‘Hinterland Areas’ (EMRSES, 2018, p.29) in particular: ‘Compact and sustainable growth of towns with 30% of all growth to develop within the existing built up areas;
- >> Kaymed supports Regional Policy Objectives RPO4.50 & RPO4.51 for Local Authorities to actively support ‘ready-to-go’ regeneration projects and serviced sites as an alternative to one-off rural housing (EMRSES, 2018, p.63);
- >> Kaymed supports the ‘Guiding Principles’ for Integration of Land Use and Transport, in particular that: ‘For urban-generated development, the development of lands within or contiguous with existing urban areas should be prioritised over development in less accessible locations’(EMRSES, 2018, p.145);
- >> Kaymed does not support the Settlement Strategy, which determines that a ‘medium to large sized settlement’ is one which is above 5,000 in population and that the remaining towns are ‘small towns and villages’ (EMRSES, 2018, p.145); and
- >> Leaving aside Kaymed’s present predicament, the company is very concerned that the Settlement Strategy of the EMRSES as it is presently drafted, by bluntly using a population threshold to categorise Kilcullen as a ‘small town or village’, does not adequately recognise the importance of Kilcullen as a key employment centre in the EMRA, and one that is even outperforming many ‘medium to large towns’.



# Introduction

Future Analytics Consulting Ltd. (FAC) has prepared this submission to the Eastern and Midland Regional Assembly Draft Regional Spatial and Economic Strategy (EMRSES) on behalf of Kayfoam Woolfson, trading as Kaymed (Kaymed). Kaymed commends the Eastern and Midland Regional Assembly (the Assembly) on the publication of the document which is directly informed by Project Ireland 2040 - The National Planning Framework (NPF) and National Development Plan (NDP). Kaymed strongly supports the combination of spatial and economic planning to provide one document which supports the future growth of the Eastern and Midland Regional Assembly (EMRA) region. This overarching approach provides a high level, consistent approach to planning of the economic core of the country and is supported by Kaymed.



Kaymed commends the Eastern and Midland Regional Assembly (the Assembly) on the publication of the document which is directly informed by Project Ireland 2040 - The National Planning Framework (NPF) and National Development Plan (NDP).





# About Kaymed

Kayfoam Woolfson, trading as Kaymed is the anchor employer in Kilcullen, employing approximately 180 people, and operating locally since 1992. Kaymed is Ireland's leading manufacturer of cushioning Foam and Bedding products. The company's Foam products are sold principally into the mattress and furniture sectors, and its Bedding products, including leading brands such as King Koil, Odearest and Kaymed are sold to the major retailers in the Irish and UK markets. The company was founded in 1898 and was led by three generations of the Woolfson family, who still retain a minority shareholding. Kaymed also owns and develops a range of proprietary foam and gel polymer technologies, which it markets to global mattress manufacturers. Kaymed's key clients include Bensi (UK) and Harvey Norman (Ireland). The company received the FIRA (Furniture Industry Research Association) Innovation Award 2005. received The National Bed Federation's 2017 "Manufacturer of the Year Award" for UK and Ireland and Deloitte "Best Managed Company" award in 2018.

Kaymed's innovative technologies enable its retail and manufacturing customers to stand out and differentiate their product offerings to achieve unique positions in their markets. Through quality design and innovation, Kaymed's consumer bedding products drive retail, hotel and online sales performance for its customers. With decades of experience servicing the exact needs of international mattress manufacturers, Kaymed reduces management and supply chain complexity through IT driven customer service, order integration and supply chain management. Kaymed works collaboratively with customers to share best practice in design and marketing of modern consumer bedding products, to ensure our customers stay ahead of the competition and to maximise their commercial returns.



The company received The National Bed Federation's 2017 "Manufacturer of the Year Award" for UK and Ireland and Deloitte "Best Managed Company" award in 2018.



## Kaymed in Kilcullen

Kaymed operates a traditional consumer mattress and bedding plant in Kilcullen, County Kildare. Kaymed also manufactures Foam, Fibre and rolled mattresses at its plant in Bluebell, Dublin. Combined, the plants employ over 300 people. Consumer bed brands, including King Koil and Odearest, occupy leading market positions in Ireland and are stocked by the key retailers in the Irish market. Kaymed has been operating in Kilcullen since 1992 in the Kilcullen Industrial Estate on the Naas Road 600 metres north of the town centre. During this time Kaymed has been one of Kilcullen's biggest employers. As set out in Table 6 below, the company employs 114 unskilled manual operatives, 37 skilled manual operatives and 30 supervisors or managers. In 2015 / 2016 Kaymed expanded its operations in Kilcullen significantly, mainly driven by growth in the UK market and increased headcount, from 110 employees to 166. In 2017, Kaymed expanded its floorspace by almost 10% from 7,618 sq. m to 8,361 sq. m. Kaymed presently directly employs 164 people and 17 indirectly.

One of the enduring challenges for Kaymed is staff turnover. In 2018 Kaymed had a 25% staff turnover rate and the predominant reason cited for this is a lack of suitable residential accommodation in Kilcullen.

Kaymed's Kilcullen operations have increased turnover year on year since 2013, and in 2018 turnover for the Kilcullen operations was €34,115,000. This contributes significantly to the local economy of Kilcullen through employee salaries and purchase of local goods and services. Coinciding with the uplift in employees in 2016, the company achieved significant turnover increases that year, which has been maintained and improved upon since. Kaymed also contributes significantly to the rate base of Kildare County Council, having made annual rates payments of over €35,000 until 2017. In 2018 the council rates payment for Kaymed was increased to €43,797.

	Actual 2013	Actual 2014	Actual 2015	Actual 2016	Actual 2017	Actual 2018	Forecast 2019*	Forecast 2020*	Forecast 2021*
Turnover	€13,164,000	€15,747,000	€20,087,000	€32,224,000	€32,850,000	€34,115,000	€32,186,000	€33,474,000	€34,813,000
Direct Employees	80	85	110	166	170	164	168	171	173
Indirect Employees	17	15	15	15	17	17	17	17	17
Total Employees	97	100	125	181	187	181	185	188	190
Rates	€36,199	€36,199	€36,199	€36,199	€36,198	€43,797	€43,797	€43,797	€43,797
Floorspace (sq. ft)	82000	82000	82000	82000	90000	90000	90000	90000	90000

Table 1: Kaymed's key business statistics relating to its Kilcullen operations.

\*Forecasts based on divesting of adjacent unused adjacent landholding

## The Outlook for Kaymed in Kilcullen

Kaymed is an economic success story for the town of Kilcullen, being one of the key employers for the town since 1992 (Kilcullen's anchor employer). It has also expanded as a business with turnover increasing year-on-year alongside a growing reputation within the bedding industry. In recent years, following significant investment, the business has expanded successfully both in Kilcullen and in its sister operations in Bluebell, Dublin.

On face value Kaymed, Kilcullen is in an excellent market position for future growth and expansion. However, recent geo-political developments have put the company at considerable risk. 70% of Kaymed's exports go to the UK and with BREXIT looming there is a significant risk to business. Kaymed's Chief Financial Officer, John Sexton is of the view that:

*"no matter what the outcome of the current Brexit negotiations will be, there will be an increase in costs for companies selling in to the UK. We need to offset these increased costs by investing in cost-saving initiatives and increased efficiencies through the introduction of new technologies and automation where feasible. By not investing, the Kilcullen operation will become increasingly isolated."*

Kaymed have considered other cost saving strategies, including transport costs incurred in transfer of materials to and from the Kilcullen and Bluebell plants. John Sexton has remarked:

*"There is a considerable premium already incurred by having the two factories relatively far apart as shipping foam from Bluebell to Kilcullen is very expensive given its bulky nature. We have often reviewed and been asked by various stakeholders why we don't consolidate all manufacturing in the Bluebell operation or establish mattress manufacturing in the UK. That is always an option but not one we favour for a whole host of reasons."*

Rather than consolidating the two operating sites, the company's first preference is to remain in Kilcullen. However, in order to do this Kaymed will be required to fund the critical measures required to offset looming additional operational costs, in particular the automation of processes and upskilling of the workforce accordingly.

A detailed analysis of business risks has confirmed that Brexit will have a negative impact on the business for the foreseeable future regardless of what agreement is put in place between the EU and UK given the company's dependence on sterling sales to the UK. In preparation for this reality Kaymed have taken proactive steps to reduce the impact of increased business costs that will need to be absorbed in a post-BREXIT market. The company introduced a "just-in-time" (JIT) regime between the Dublin and Kilcullen sites which eliminated the need to hold over 180 pallet spaces of foam in the Kilcullen operation, thereby reducing space requirements. Kaymed CFO John Sexton made the following remarks of the business strategy:

*"The company resolved that any investments made in the Kilcullen facility now need to prioritise increasing efficiencies and competitiveness, to make margins more sustainable rather than incurring expensive building costs so the idea of expanding the building on the Kilcullen site is now well and truly dead."*

In order to remain viable in Kilcullen with realities of BREXIT looming, Kaymed needs to invest significantly and in turn fully explore all sources of funding including divesting of adjacent unused lands<sup>1</sup>. This is actively being pursued alongside the implementation of plans to upgrade process technologies, and upskilling of employees.

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<sup>1</sup> <https://kilcullenbridge.blogspot.com/2018/10/kaymed-drops-plans-to-extend-factory.html>

# Kaymed and the Eastern & Midland RSES

With the reality that Kaymed is to divest in its adjacent unused lands, the company is cognisant both of the role it plays as a key employer in Kilcullen area, and the strategic planning objectives for the town, the county and the wider Eastern and Midland Region. The company has reviewed the land possible land uses in terms of 'highest and best use' – one of the fundamental principles that underlie real estate appraisal. In considering the industrial use as envisaged by the zoning set down by the Kildare County Development Plan 2017-2023, Kaymed recognises that there is little market interest in investment in industrial uses in Kilcullen. This is evidenced by the extensive lands zoned industrial to the north and south of the town that lie vacant without planning permissions. Given that these lands represent more viable and accessible industrial lands, Kaymed believe that industrial zoning on its adjacent unused lands is inappropriate. Residential development of the Kaymed unused lands appear to be the most viable land use for the site, satisfying market demand for housing development within a town centre, providing much needed homes to alleviate the housing crisis, and allowing Kaymed to maintain its presence in Kilcullen as a key employer.

In engaging with Kildare County Council as a Planning Authority, it is clear that the Draft EMRSES is to play a significant role in the future development of the Kilcullen. Kaymed wishes to make a submission to the Draft EMRSES for the following reasons:

1. **Kaymed supports** Regional Policy Objectives RPO 6.31 and 6.32, which recognise anticipated economic risk and structural changes (EMRSES, 2018, p.109), however the strategy does not proactively provide for resilient business strategies. To this end, Kaymed submits that the EMRSES should include Regional Planning Objective that facilitates potential "pivot strategies" for BREXIT affected business, including relocations and rezonings of land within urban centres provided the re-zoning is to a use typical of a 'town centre' and in line with overall objectives of county development plans;
2. **Kaymed supports** all measures to achieve the stated 'growth enablers' for the Hinterland Areas (EMRSES, 2018, p.29) in particular: 'Compact and sustainable growth of towns

with 30% of all growth to develop within the existing built up areas';

3. **Kaymed supports** Regional Policy Objectives RPO4.50 & RPO4.51 for Local Authorities to actively support 'ready-to-go' regeneration projects and serviced sites as an alternative to one-off rural housing (EMRSES, 2018, p.63);
4. **Kaymed supports** the 'Guiding Principles' for Integration of Land Use and Transport, in particular that: 'For urban-generated development, the development of lands within or contiguous with existing urban areas should be prioritised over development in less accessible locations'(EMRSES, 2018, p.145); and
5. **Kaymed does not support** the Settlement Strategy, which determines that a 'medium to large sized settlement' is one which is above 5,000 in population and that the remaining towns are 'small towns and villages' (EMRSES, 2018, p.145).

The following sections set out in detail Kaymed's submission to the Draft EMRSES expanding on points 1 to 5 above.



## Anticipated Economic Risk and Structural changes

Addressing point 4 above, and underlining the importance of the efficacy of the Settlement Strategy to provide for employment centres such as Kilcullen, Kaymed supports the recognition anticipated economic risk and structural changes through Regional Policy Objectives RPO 6.31 and 6.32. Of significance to Kaymed's present business predicament, these objectives recognise the climate of economic change and potential risk for businesses and towns. It includes 'future-proofing measures to ensure readiness to address emerging challenges'. The EMRSES outlines that 'there is a variety of emerging issues such as BREXIT, international tax developments, US trade and investment policies, technological advances, and climate change. Accordingly, the EMRSES includes the following objectives:

*"RPO6.31 Prepare and operate an economic risk management system, with preventive action plans, considering social and environment factors; and*

*RPO 6.32: Support enterprise agencies, RAPJs, LECs, Regional Skills fora and local stakeholders on their introduction of contingency plans and pilot projects based on the strengths of the Region to counteract the effects from industrial decline and potential external shocks in the Region. This may include lifelong learning programmes, appropriate business supports and upskilling to facilitate moving to alternative sectors in the locality or region. (EMRSES, 2018, p.145)"*

Given the recognition of risk as expressed by EMRA, due consideration should be given to businesses such as Kaymed who are required to re-position themselves in the face of changing trading conditions as a result of Brexit in order to ensure continued economic vibrancy, particularly in Ireland's rural towns. It is notable that the focus to date has been on the hard / soft border question in relation to BREXIT. Urgent regard should be given to the implication of BREXIT on the export market. The Irish Exporters Association in their March 2018 BREXIT survey revealed that 93% of their members believe that BREXIT will have a harmful effect<sup>2</sup>.

In this context, Kaymed as well as other UK-reliant businesses in the EMRA are under considerable strain. While the above objectives recognise this, they do not proactively provide opportunities for business to reposition themselves against new trading headwinds. Kaymed therefore submit that the EMRSES should include Regional Planning Objective that facilitates potential "pivot strategies" for BREXIT affected business, including relocations and rezonings of land within urban centres provided the re-zoning is to a use typical of a 'town centre' and in line with overall objectives of county development plans.

It is believed that including an objective such as this in the EMRSES would not only recognise, but also provide for a BREXIT-ready region that is resilient and adaptable to economic stress and strain.

<sup>2</sup> <http://irishexporters.ie/2018/03/20/exports-on-the-increase-and-businesses-looking-to-diversify-iea-brexit-survey/>

## Compact Urban Form

Addressing points 1 to 3 above, Kaymed strongly believe that compact urban settlements create vibrant communities, in which its employees can thrive. The EMRSES in including the above-referenced provisions is clearly seeking to achieve this, which is commended and supported by Kaymed. It is suggested that Kaymed's unused lands adjacent to its existing facility is ideally placed to contribute towards the compact urban form in Kilcullen while maintaining the town's potential for employment growth in the vacant lands zoned industrial to the north and south of the town – more appropriate locations for industrial uses. Kaymed's unused lands are

located only 700m from Kilcullen town centre and has a proven track record as a 'clean use' residential neighbour, as evidenced by the presence of existing residential development abutting the southern boundary of the plant – Kaymed (and its adjacent unused lands) is effectively situated within a thriving residential community.

In directly employing over 180 workers, Kaymed is one of the key employers in Kilcullen. One of the ongoing objectives of the company is attracting locally-based employees. This is proving increasingly difficult with the lack of housing options within the town.

Period Built	Households	% of Total
1981 - 1990	64	4.9%
1991 - 2000	116	9.0%
2001 - 2010	671	51.8%
2011 or later	10	0.8%
Not stated	90	6.9%
Total	1,296	100.0%

Table 2: Permanent private households by year built in Kilcullen (Source: Census 2016, CSO)

Type of occupancy	Households	% of Total
1981 - 1990	8,220	11.2%
1991 - 2000	14,904	20.3%
2001 - 2010	22,334	30.4%
2011 or later	1,739	2.4%
Not stated	4,009	5.5%
Total	73,348	100%

Table 3: Permanent private households by year built in County Kildare (Source: Census 2016, CSO)

Given the low levels of residential development having been built in Kilcullen since 2011 (0.8% of the total housing stock) compared to County Kildare during the same period (2.4% of total housing stock), it is clear that there is a valid case for augmenting the residential stock in the town centre (see Tables 2 and 3 above).

The Society of Chartered Surveyors Ireland (SCSI) highlight rural depopulation in Ireland's towns as a 'barrier to ensuring vibrant regional high streets' in their recent publication *Rejuvenating Ireland's Small Towns* (2018)<sup>3</sup>, stating:

*"Population decline in rural areas, particularly because of recession-driven emigration and migration, has resulted in a lack of viability for many rural retailers because of custom base, footfall/passing trade and employment."*

Given the Kaymed lands proximity to the town centre, the site is seen to be consistent with the EMRSES provisions seeking to consolidate town centres, and creating compact urban settlements. Regional Planning Objectives 4.50 and 4.51 of the EMRSES seek to identify significant ready-to-go and serviced sites to regenerate rural towns and provide an alternative to one-off rural housing. The Kaymed lands, if appropriately zoned for residential development, would provide achieve this for Kilcullen. Figure 1 below shows the Kaymed lands in the context of the remaining lands zoned for New Residential in Kilcullen.

Utilising the Department of Housing, Planning and Local Government's Residential Land Availability Survey to assess the capacity of the residential land parcels, Kilcullen has the potential for an additional 2,206 residents within land currently zoned for new residential. Kaymed support the growth the Kilcullen to this extent. It is notable, however that many of the land parcels shown above are 'backland' sites, and have not attracted development as yet. The

site marked by the red point in Figure 1 above is the only site zoned for new residential that has an extant permission. This permission is for 108 residential units, however this has not been commenced and is due to expire in April 2019. It is submitted that the Kaymed lands are more favourable development lands than those presently zoned for the following reasons:

- » The central location of the lands within the urban extent of Kilcullen, less than 700 metres from the centre of the town, and within an existing established residential area – consistent with the compact urban form, and supported by provisions of EMRSES outlined in points 1 to 3 above;
- » The site is adjacent (to the north and south) established residential development and has excellent accessibility with a road frontage to the Naas Road and would continue the established residential use in this part of the Naas Road;
- » Many of the alternative Zone C sites are considered 'backland' sites and do not lend themselves for logical extensions to the urban area.

<sup>3</sup> [https://www.scsi.ie/resources/pdf/2018/scsi\\_rejuvenating\\_irelands\\_small\\_town\\_centres](https://www.scsi.ie/resources/pdf/2018/scsi_rejuvenating_irelands_small_town_centres)

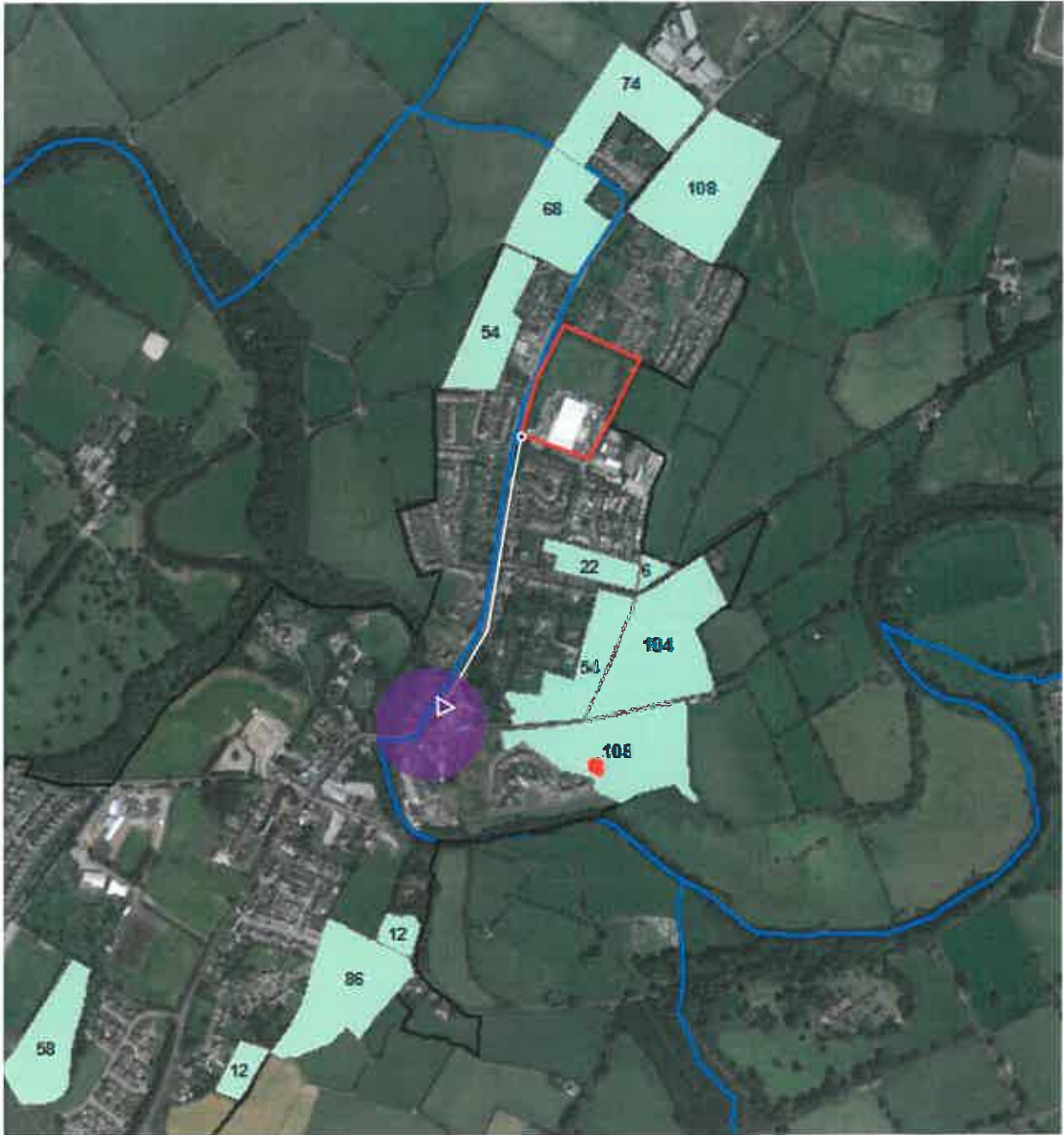


Figure 1: Kilcullen's residential capacity (light green: land parcels zoned C with capacity at 20 units p/h labelled; red point: extant permission of 108 units), Kaymed lands highlights in red and orange arrow showing 700m to town centre (Source: Residential Land Availability Survey 2014, Kildare County Council Online Planning Register)



## Co-located Delivery and Live-work Housing Concept

In the context of Kaymed having faced many years with the recurring challenge of staff retention and turnover due to a lack of suitable housing for its employees, it is envisaged to create a 'live-work' campus on its unused lands. This would have the dual benefit for Kaymed of making the most efficient, highest and best use of its lands, and ensuring its employees have access to housing in immediate proximity to its Kilcullen operations. Figure 2 shows an indicative site layout by Van Dyk Architects for 62 housing units on Kaymed unused adjacent lands, many of which could directly support Kaymed's ongoing accommodation challenges.

Kaymed is aware of successful examples of such schemes, and is committed to working with Kildare

County Council to achieve a workable scheme with appropriate social housing component. In terms of the EMRSES role in facilitating such win-win outcomes, it is again submitted that the EMRSES should include Regional Planning Objective that facilitates potential "pivot strategies" for BREXIT affected business, including relocations and rezonings of land within urban centres provided the re-zoning is to a use typical of a 'town centre' and in line with overall objectives of county development plans.

The above submission on the compact urban form has particular implications and crossovers with the EMRSES Settlement Strategy, which Kaymed is seeking to amend as per the following section.



Figure 2: Indicative site designs for Kaymed's adjacent unused lands (Van Dyk Architects)

EMRSES Settlement Strategy

Addressing point 5 above, Kaymed strongly object to the approach of the EMRSES Settlement Strategy that a 'medium to large sized settlement' is one which is above 5,000 in population and that the remaining towns are 'small towns and villages'

(EMRSES, 2018, p.145). The implication of this classification is very serious for a town like Kilcullen, which has an ambitious and dynamic population of over 4,000 residents, and is targeted to grow to 4,927 by 2023 (See Figure 2 below).

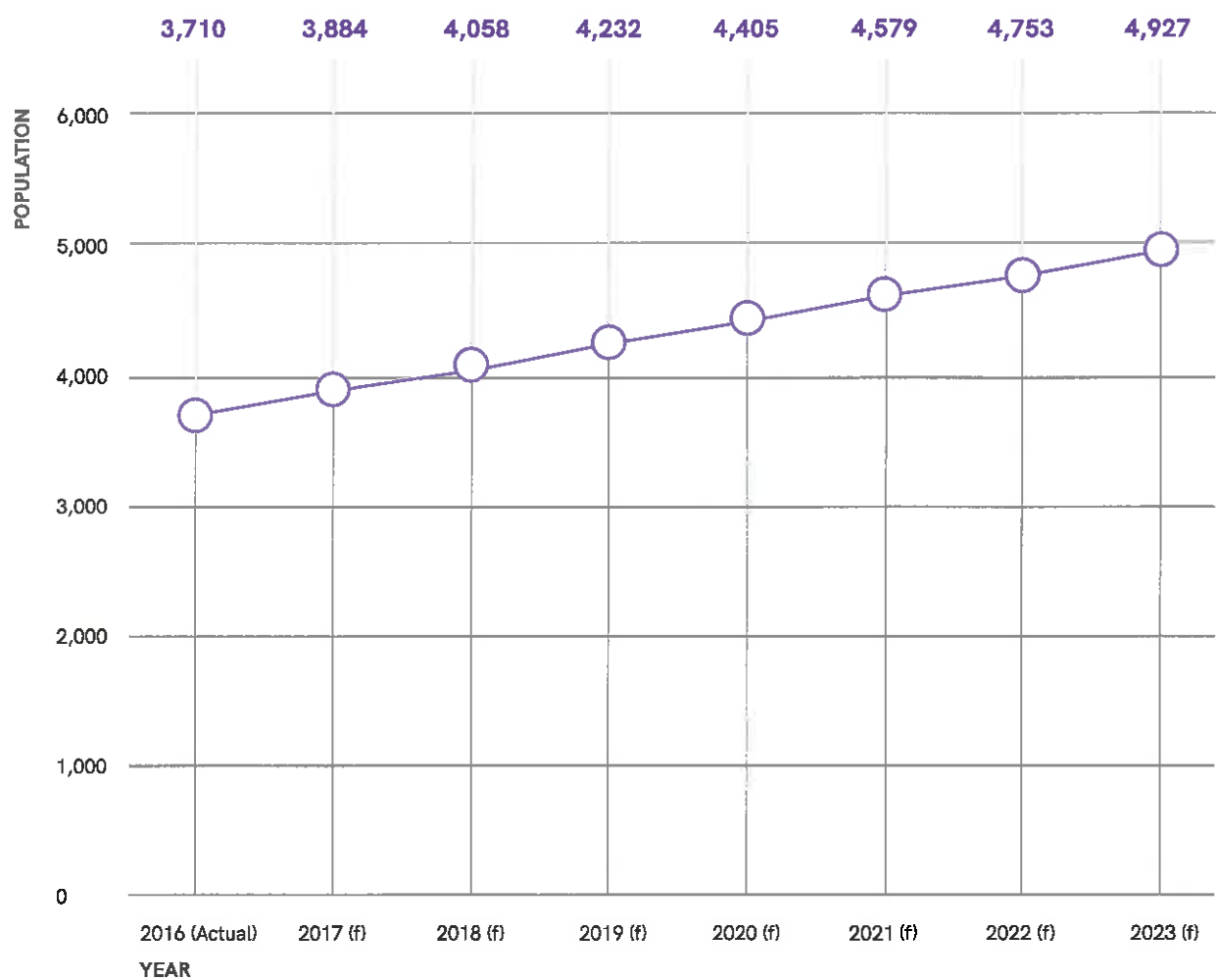


Figure 3: Projected population growth of Kilcullen, 2016–2023 (Source: Kildare County Development Plan 2017–2023 Core Strategy Target Interpolated year-on-year)

The determination of a medium or small town on the basis of a numeric value of its population appears to be an arbitrary and unnecessary approach and one which puts the future of Kilcullen in jeopardy, for example reducing allocations of structural funding for key infrastructure.

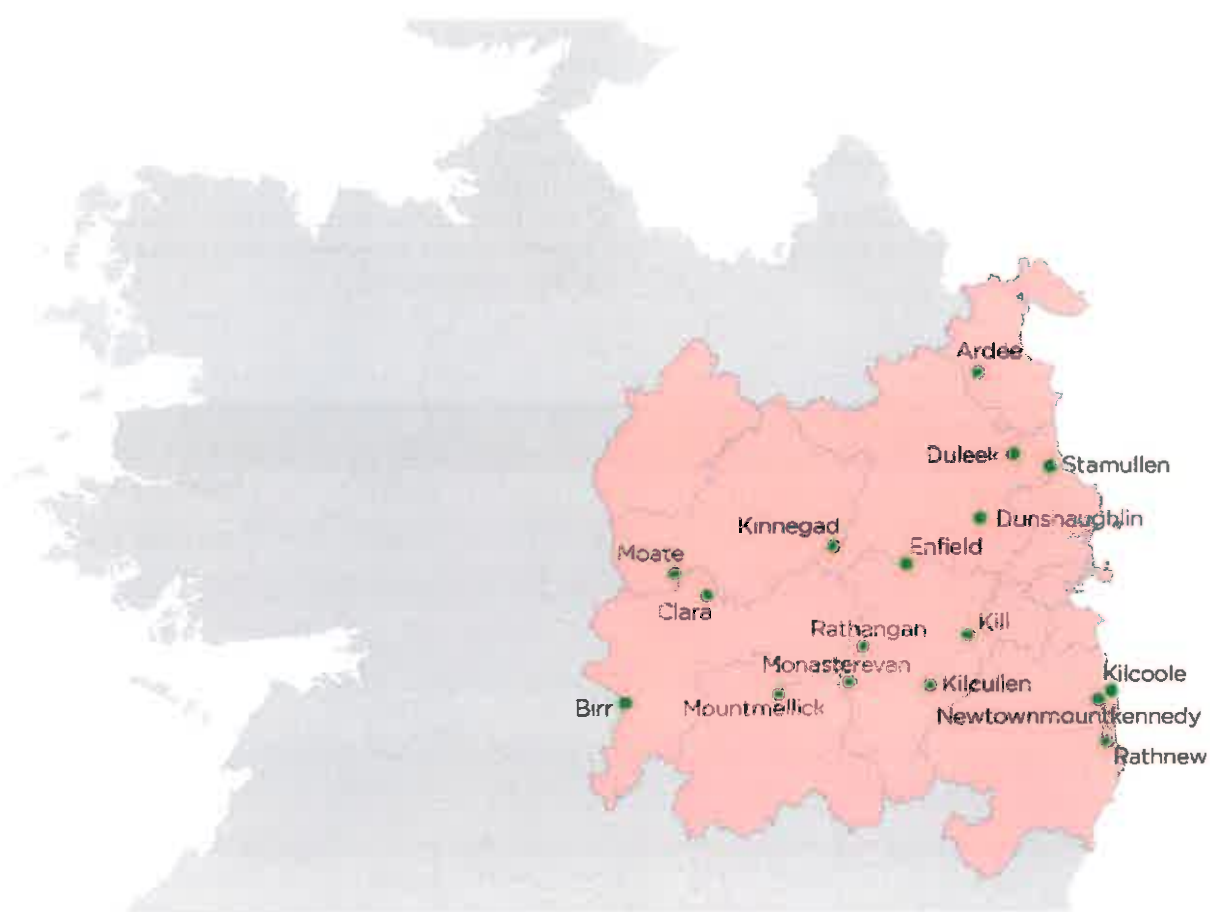


Figure 4: Key Settlements of 2,500 to 5,000 in the EMRA

Figure 3 above shows the towns in the EMRA that also fall under the threshold for a 'medium to large town', illustrating the breadth of towns which are within a similar range of population to Kilcullen. For Kilcullen, along with Enfield, Kinnegad and Dunshaughlin to be considered 'small towns or villages' is discrediting to such towns, which are key employment and service towns within the region. While Kilcullen's population may be below 5,000, the town sees itself, along with Athgarvan, as part of the urban agglomeration of Newbridge, which is home to almost 30,000 people in total. The EMRSES's blunt classification of its settlements fails to recognise this and in doing so it puts Kilcullen at risk of stagnation through lack of investment.

The Draft National Planning Framework (NPF) underlines the role of employment in Ireland's urban structure stating that:

*"Population only partly explains Ireland's urban structure and employment, or more specifically, where jobs are located, is also an important factor." (NPF, p.59).*

In seeking recognition of this, the NPF includes analysis of population and employment in urban settlements using Census 2016 data. Kilcullen is identified as having 0.577 jobs per resident workers, comparing favourably to Enfield (0.330), Kinnegad (0.391) and Dunshaughlin (0.542). Kilcullen is also shown to be out-performing towns in the category of 'medium to large towns' in terms of jobs per resident workers, namely: Blessington (0.467); Celbridge (0.250); Clane (0.377); Donabate (0.214); Dunboyne (0.368); Kilcock (0.300); Portarlinton (0.435); Ratoath (0.216); and Sallins (0.150). Table 4 below adapts the NPF population and employment table and sets out how Kilcullen compares to selected settlements.

Settlement	Population	Resident workers	Total jobs	Jobs: Resident workers	EMRSES Settlement Strategy Category
<b>Kilcullen</b>	<b>3,710</b>	<b>1,573</b>	<b>907</b>	<b>0.577</b>	<b>Small town or Village</b>
Dunshaughlin	4,035	1,841	998	0.542	Small town or Village
Blessington	5,520	2,407	1,125	0.467	Medium to Large Town
Portarlinton	8,368	3,103	1,349	0.435	Medium to Large Town
Kinnegad	2,745	1,019	398	0.391	Small town or Village
Clane	7,280	3,349	1,264	0.377	Medium to Large Town
Dunboyne	7,272	3,294	1,211	0.368	Medium to Large Town
Enfield	3,239	1,423	469	0.330	Small town or Village
Kilcock	6,093	2,827	848	0.300	Medium to Large Town
Ratoath	9,533	4,260	922	0.216	Medium to Large Town
Sallins	5,849	2,784	418	0.15	Medium to Large Town

Table 4: Jobs per resident worker for selected EMRA settlements (source: NPF) and settlement strategy categorisation (source: EMRSES)



Table 4 above shows that Kilcullen has a higher ratio of jobs per population than seven towns classified as being 'medium to large towns', and despite this the EMRSES categorises Kilcullen as a 'small town or village'. In doing so, the EMRSES Settlement Strategy fails to recognise the economic significance of Kilcullen by applying the blunt measure of population alone to categorise its settlements. In this way the EMRSES is inconsistent with the NPF, which requires a more nuanced approach to be taken to settlement strategy. National Policy Objective 7 seeks to:

*"Apply a tailored approach to urban development... with a particular focus on...*

- Encouraging population growth in strong employment and service centres of all sizes, supported by employment growth;
- In more self-contained settlements of all sizes, supporting a continuation of balanced population and employment growth" (NPF, p.61).

It is submitted that Kilcullen, rather than being a 'small town or village', is in fact a 'medium to large town' in the context of the EMRA. Medium to large sized towns are defined by the EMRSES as follows:

- "i) Medium to large sized towns with a moderate level of jobs and services- includes sub-county market towns and commuter towns with good transport links and capacity for continued commensurate growth to become more self-sustaining; and*
- ii) Towns with high levels of population growth and a weak employment base which are reliant on other areas for employment and/or services and which require targeted 'catch up' investment to become more self-sustaining" (EMRSES, 2018, p.38).*

It is argued that Kilcullen falls under the definition of a medium to large sized town under the first category above. Table 4 above shows that the town is consistent within this definition in terms of jobs and services.





### Kilcullen as a Regional Economic Driver

Expanding more on Kilcullen's workforce itself, while Kaymed provide a significant proportion of jobs, other Irish owned and operated employers are located in Kilcullen, such as the headquarters of Murphy Surveys, Provincial Security & Support Services, John Craddock Construction, Carveon Leather Manufacturers, EcoKem, and Kildare Bathroom Compnay to name just a few. Kilcullen's employment significance therefore should be recognised by the EMRSES.

Figures 6 and 7 show in more detail the trends in socio-economic groupings in Kilcullen as compared to County Kildare. The socio-economic group of persons aged 15 years or over who are at work is determined by their occupation and employment status. Overall Kilcullen's proportion of socio-economic groupings are relatively consistent with the county-wide trends, however the town has seen a proportionately higher increase in 'non-manual' workers during the period 2011 to 2016, than that of the county.



Figure 5: Murphy Surveys Headquarters and Carveon Leather Manufacturers, Kilcullen

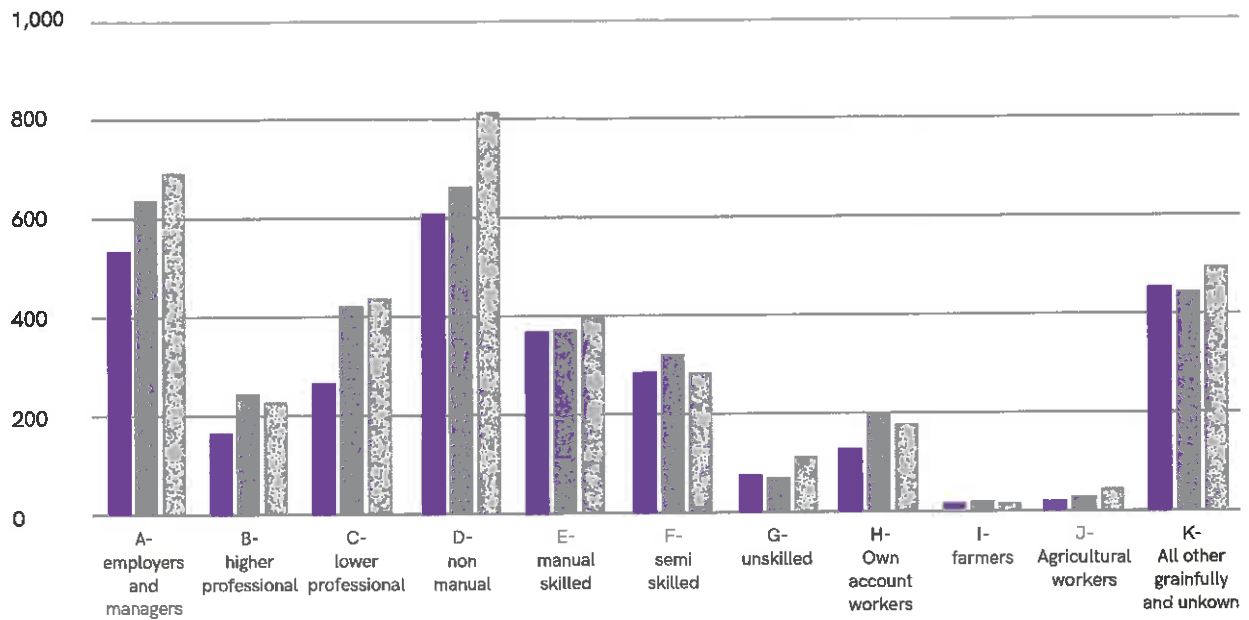


Figure 6: Persons in Kilcullen by socio-economic group (Census 2016, 2011 & 2006, CSO)

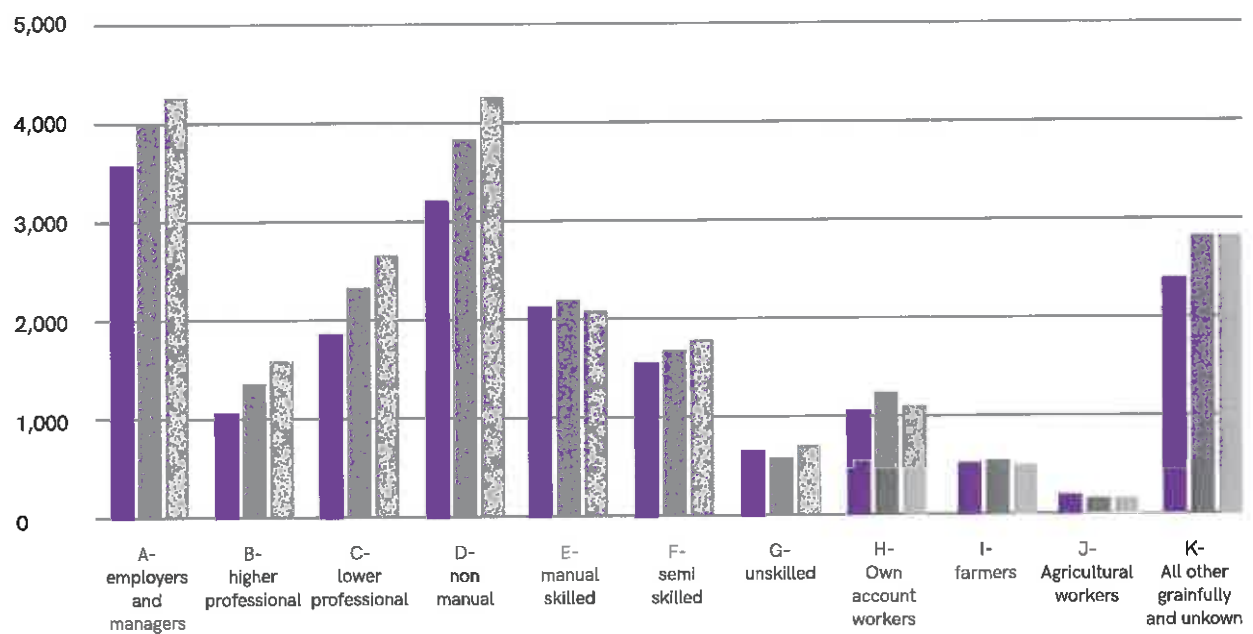


Figure 7: Persons in County Kildare by socio-economic group (Census 2016, 2011 & 2006, CSO)



In relation to transport links as indicated in the EMRS Settlement Strategy as a measure of a 'medium to large town', Kilcullen also compares favourably to other towns. This is evidenced by the working and travelling patterns of Kilcullen residents. As can be seen in Figures 7 and 8 below, Kilcullen residents' journey times to work, school or college in 2016 were reasonably similar to that of the county as a whole. Kilcullen has, however reported a more significant increase in shorter journey times (under 15 and under 30 mins) than that of the county as a whole. Less than 265 persons reported commuting between 60 and 90 minutes. This signals a shift to a more sustainable commuting model for the town. It is also notable that Kilcullen is only 8km from Newbridge Park and Ride Train Station, which provides Kilcullen with an easily accessible sustainable mode travel option to Dublin City, further underlining Kilcullen's connection with Newbridge.

destinations, for example to nearby urban centres of employment such as Newbridge, Naas and Athy. This is evidenced by the decreasing commuting time trends outlined in Figures 7 and 8 above. It is also notable that 576 persons commute to Kilcullen from outside the electoral division as working destination, supplementing the town's overall workforce.

CSO 'Workplace Zones' data allows a determination of daily net inward and outward migration of the daily workforce. This data reports that of the 1,451 residents in the electoral division of Kilcullen 'at work', 1,008 (69%) of them left Kilcullen for employment in 2016. It is argued, however that the majority of commuters from Kilcullen are doing so to local

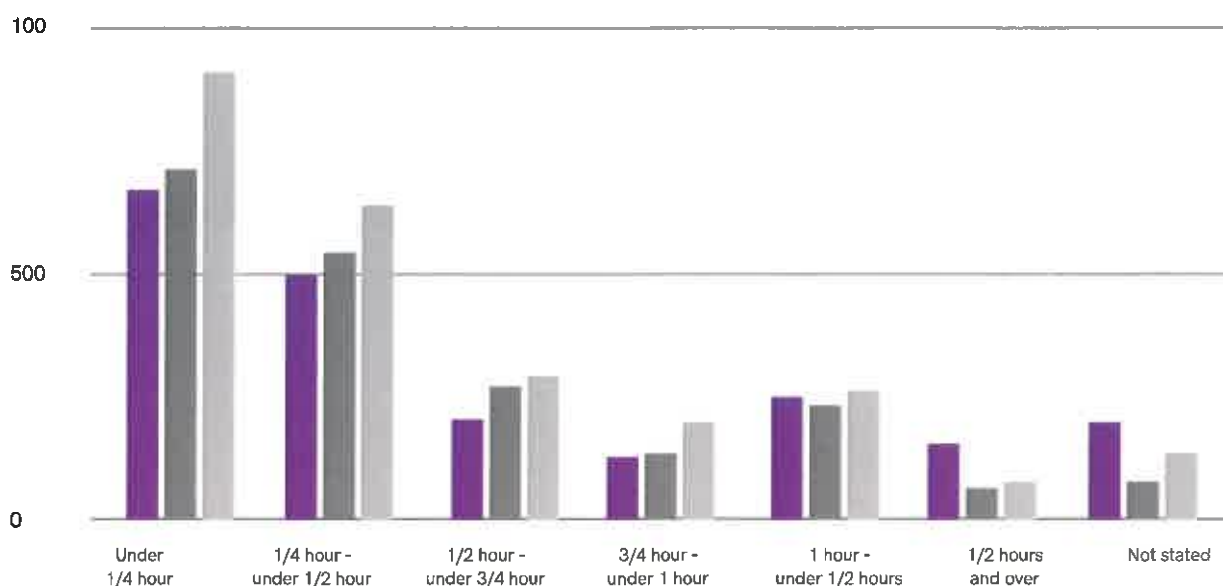


Figure 8: Kilcullen resident population aged 5 years and over by time leaving home to work, school or college (Census 2016, 2011 & 2006, CSO)



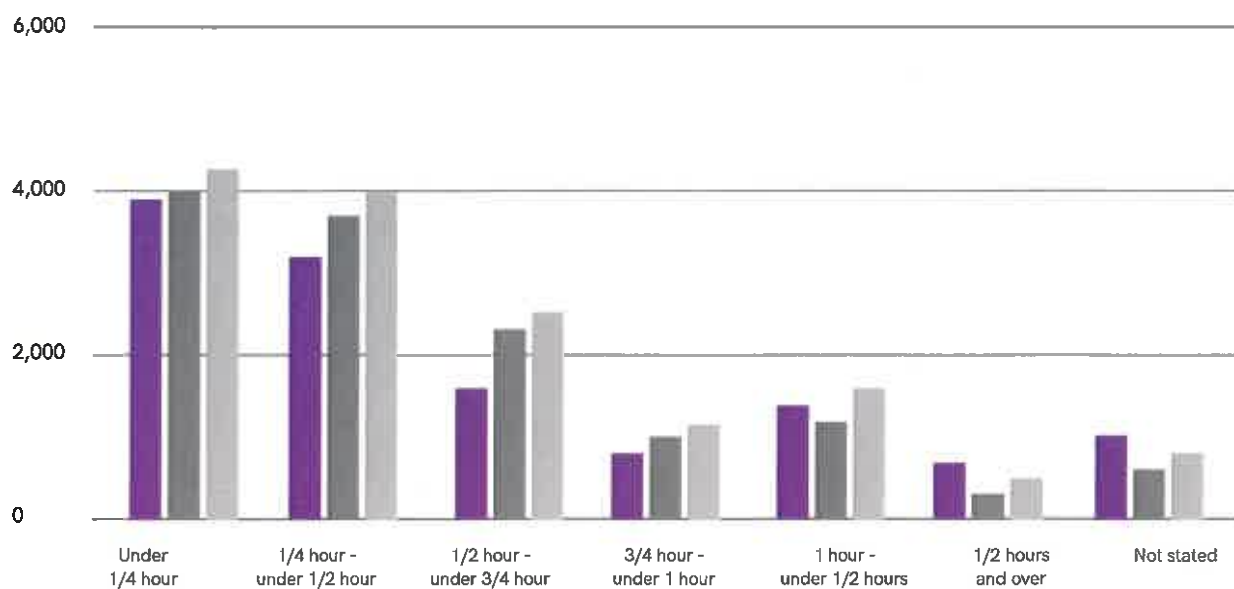


Figure 9: County Kildare resident population aged 5 years and over by time leaving home to work, school or college (Census 2016, 2011 & 2006, CSO)



Leaving aside Kaymed's present predicament, the company is very concerned that the Settlement Strategy of the Draft EMRSES, by bluntly using a population threshold to categorise Kilcullen as a 'small town or village', does not adequately recognise the importance of Kilcullen as a key urban centre in the EMRA.





# Conclusion

Kaymed, which has been operating as a key employer in Kilcullen since 1992 is re-positioning itself in the face of new trading headwinds and challenges arising from 'BREXIT'. In order to protect adversely affected margins and secure the future viability of the company's Kilcullen operation, Kaymed is pursuing technological advances, upskilling its workforce as well as rationalising transport costs to and from its Dublin plant. For these reasons, Kaymed's landholding adjacent the site to the north is no longer required, and the company has resolved to divest from it and is actively pursuing the concept of providing 'live-work' units on the site, addressing the ongoing challenge of a lack of suitable accommodation locally. It is demonstrated in this submission that the use of these lands for residential infill to achieve targeted population increases is consistent with many Regional Planning Objectives of the Draft EMRSES, which are supported. The Draft EMRSES also appropriately includes Regional Planning Objectives, which recognise anticipated economic risk and structural changes such as those currently being faced by Kaymed, however it does not proactively provide for adaptation strategies, such as re-zoning within urban centres to town centre type zones – as suggested by this submission.

Leaving aside Kaymed's present predicament, the company is very concerned that the Settlement Strategy of the Draft EMRSES, by bluntly using a population threshold to categorise Kilcullen as a 'small town or village', does not adequately recognise the importance of Kilcullen as a key urban centre in the EMRA. Kaymed is concerned that this will jeopardise the future of Kilcullen if the small town and village categorisation endures to the county development plan. The foregoing demonstrates clearly that Kilcullen provides more jobs per resident population than many towns categorised as 'medium to large towns'. The EMRSES in its Settlement Strategy fails to recognise that consideration of employment

in urban development is a key tenet of the National Planning Framework. Alongside this, it is noted that Kilcullen is moving towards a sustainable transport model with ever-reducing commuter times, and the advantage of proximity to Newbridge Park and Ride Train Station.

It is submitted that an alternative approach to the EMRSES Settlement Strategy should be adopted which recognises employment as a key tenet of the EMRSES Settlement Strategy. The alternative fails to recognise the strengths of the region, where key employment centres like Kilcullen are being categorised as 'small towns and villages' with far-reaching adverse implications for the town.



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On the Draft Regional Spatial and Economic  
Strategy for the Eastern and Midland Region

Submitted for Kayfoam Woolfson, trading as Kaymed



Prepared by

 **Future Analytics**  
Planning | Research | Economics



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