

Heather Cooke

From: Rob Power <info@emra.ie>
Sent: 23 January 2019 16:56
To: RSES
Subject: RSES - Online submission

Follow Up Flag: Follow up
Flag Status: Completed

From: Rob Power <[REDACTED]>
Organisation: Kildare County Council

Message Body:
Please find my submission document attached.

Regards,
Cllr Rob Power
Kildare County Council

--
This e-mail was sent from a submission form on Eastern & Midland Regional Assembly (<http://emra.ie>)

02/21/2014 10:10:10 AM

Cllr Rob Power
Kildare County Council

23rd January 2019

RE:

Submission on Draft Regional Spatial & Economic Strategy

Introduction

Figure 1.2 referring to Spatial Planning Hierarchy in Ireland is misleading. Clearly the reality of the situation is the inverse to this diagram whereby the NPF is the guiding document for the regional assembly which in turn is now dictating changes to county level plans. It should be acknowledged that the process of plan development in Ireland is a “Top Down” approach where the NPF dictates how more regional and local plans are formed.

3.2 Growth Enablers for the Region

Hinterland Area

When looking at growth enablers, special consideration should be given to areas which “have produced more self-sustainable towns where there are thriving local economies”. Naas and Newbridge should be included in this category and have the ability to expand further in the provision of housing supply as the local economy and social provisions enable them to do so. This should also be considered in the context of RPO 4.23 which asks that Key Towns “improve their economic base by increasing the ratio of jobs to workers”. Naas, for example, currently has a net surplus of jobs to workers in the area and should therefore not be unduly concerned by this ratio. Indeed, forcing Naas to make further improvements in this regard could mean an unbalanced approach to job growth in other Kildare towns.

Guiding Principles for Growth in the Region

Consideration should be given to the use of land in the built up area for economic use. Many towns suffered “the donut” effect in recent years where retail development has taken place on the outskirts of towns, leaving the centre hollowed-out and lacking key services. An over-emphasis on the use of this land for housing could lead to an exacerbation of this problem. It’s important that the RSES respects a balanced approach must be taken.

4.6 Key Towns

Hinterland Region Key Towns

Naas

It is concerning that the RSES would advocate for development on the “Castle Quarter” in Naas town without consideration to its importance as both a lung and potential artery within the town. Any development on this site should be scrutinized thoroughly and where possible all existing green space be reserved.

Overall this section is scant on any detail or real information. I believe further insight will be provided in an official submission on this document by Kildare County Council. I encourage EMRA to take account of this submission and to include points raised by KCC.

Newbridge

It is understood that Newbridge was identified as a Key Town in previous versions of this draft. Its subsequent exclusion without reason is concerning. As the largest town in Kildare and the 5th largest town in the region it is important that it be considered as part of the regional planning process.

It is also important for the RSES to recognize that each County has the power to designate Key Towns in its own County Development Plans.

4.8 Rural Areas

RPO 4.52

This policy objective to “identify and provide policies to...protect valuable agricultural lands” is oxymoronic. By definition the most valuable agricultural land is that which is adjacent to the built environment and has potential to support development itself. If the reference is intended to mean valuable in the context of agricultural production then this is a significant departure from the function of local authorities. The policy should be omitted entirely.

RPO 4.53 & 4.54

Given the statement that 94% of EMRAs population lives within areas under urban influence it is suggested that both of these policy objectives are overtly onerous on individuals seeking to develop one-off houses. The wording suggesting that “economic or social need” to live in a rural area be demonstrated is overly vague and is therefore not conducive to good planning policy.

Economy & Employment

This section is very vague on actual strategy. Overall the document is lacking in this respect. It is clear that very little thought has been given to how each individual key town should respond to the generic strategy concepts laid out in the draft. For example, (pg 91) asks that planning should “include consideration of: Location of...Institutes of Technology and Universities” – surely a regional plan is a far better place to examine such locations than a county development plan.

6.5 Specific Sectors:

It is unclear as to why these specific sectors have been chosen and others omitted.

Retail – RPO 6.9

It is unclear what benefit would be derived from a retail strategy for the EMRA region as a whole. There will be little interaction between shoppers in Wicklow and retailers in Louth. It is suggested that retail strategies are better lead on a county level.