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**EASTERN & MIDLAND**

**23 JAN 2019**

**REGIONAL ASSEMBLY**

22/01/2019

**Re: Submission re Draft Regional Spatial and Economic Strategy  
for the Eastern and Midland Region  
Public Consultation**

Dear Sir/Madam,

We refer to the above invitation to make submissions or observations in respect of the Draft Regional Spatial and Economic Strategy for the Eastern and Midland Region. We have been requested by our client Patricia Thorpe of Lismullen, Garlow Cross, Navan, Co. Meath the owner of the lands showing outlined in red on the map below to make the following submission in respect of the Draft RSES for the Eastern and Midland Region.

**Site Location/Description**

The subject lands comprise 5.459Ha are located in the Kilcarn townland to the south east of Navan Town Centre abutting the R147 (formerly N3) and to the west by road. The lands are relatively flat and are surrounded by mature trees which provide screening for the site which is currently used for agricultural purposes. The lands originally formed part of a larger landholding Kilcarn House and Kilcarn Lodge which are not in the ownership of the applicant.

A significant amount of residential development has taken place to the north of the subject lands with a considerable amount of residential development currently under construction in the immediate vicinity of the subject lands. The lands are serviceable by water and sewerage. There is a footpath and public lighting extending along the front of the subject lands.

**Aerial Photograph Showing location of subject lands outlined in red.**



### **Planning History**

**Ref: NA/40557**

On 8<sup>th</sup> June 2005 Planning permission was granted for the development of a 140 bedroom 3 storey hotel and leisure facilities with bars, lounges, function rooms, conference rooms, meeting rooms, restaurants, pool, treatment room, gym, aerobics area, dressing room, toilets, kitchens, stores, staff room, basement plant and cold room, keg and bottle storage rooms, court yard and other associated ancillary facilities, roads, walls and entrances subject to 20 conditions.

This planning permission was never commenced as this development was not commercially viable.

### **Background**

Our client's company is a well-established building firm who specialise in Metal Frame Construction, developing and project managing the construction of high quality houses and also extensions, renovations. The Founder of Metal Frame Construction Ltd Richard Thorpe is a competent builder who has been in business for approximately 18 years. As they are involved in the construction business they are aware of the considerable demand for residential development in the Navan area.

The zoning of the subject lands for residential would facilitate them to seek planning permission for a unique high quality residential development of Metal Frame Construction which is fully certified under NSAI.

The advantages of Metal Frame Construction are:

Versatility & Long Spans; Steel is 100% accurate unlike timber, Long spans open spaces; Steel allows Architects to design large wide-open living spaces. Cost effectiveness; Steel is cost effective because of speed of construction and less trades are needed. Unlike timber, steel does not rot, twist or crack, is galvanised and has a long-life span. Pre-fabricated indoors – there is no time loss to weather. Sustainable; 75% of steel used in light gauge steel houses is recycled. Weight to strength ratio; It takes a lot less to achieve your building design. BER Rated; High BER rating

achieved. Air tightness; Easily achieved with a steel framed; System. U values; Appropriate U values easily achieved with; Steel Framed systems.

If the subject lands were zoned for residential our clients are committed to commencing with design and pre-planning as soon as possible with a view to delivering approximately 150-180 dwellings in accordance with National Policy.

#### **National Planning Framework 2040**

This section examines the development potential of the subject lands in the accordance with the Draft National Planning Framework 2040.

The National Planning Framework focuses on:

*“Growing our regions, their cities, towns and villages and rural fabric.*

*Building more accessible urban centres of scale.*

*Better outcomes for communities and the environment, through more effective and coordinated planning, investment and delivery”.*

Navan is a Tier 1 Town in the Meath County Development, therefore its growth is supported by the National Planning Framework.

The National Planning Framework states:

*“There will be a major new policy emphasis on renewing and developing existing built-up areas rather than continual expansion and sprawl of cities and towns out into the countryside, with a target of at least 40% of new housing to be delivered within the existing built-up areas of cities, towns and villages on infill and/or brownfield sites”.*

Section 2.2 of the National Planning Framework states as follows:

**“2.2 Strategy Development**

*Practical experience and research shows that in an economy and society such as Ireland’s, simultaneously fostering economic growth on the one hand and spreading it out smoothly or evenly across a country, is neither realistic nor practical.*

*Nor can large numbers of people be directed to selected locations.*

*However, it is possible to facilitate more inclusive and integrated growth more broadly, throughout Ireland, that would have the potential to be transformational in the long run through policies that:*

*Promote convergence in living standards between places.*

*Improve the quality of places and people’s experience of living in them.*

*Anticipate and influence market forces such as agglomeration and migration.*

*Encourage scale and concentration of people and economic activity.*

*Promote economic integration between different places.*

*Address geographic peripherality through accessibility and connectivity.”*

Meath is located in the Eastern and Midland Region as shown in the Map below taken from the National Planning Framework. The Draft RSES identifies Navan as a Key Town within the Region.

### DRAFT RSES Review:

This section examines the role of Navan within the Draft RSES and the potential of the subject lands in the context of the Draft RSES.

Under Section 3.2 “Growth Enablers for the Region”, Navan is identified as being within the “Hinterland area” in the Draft RSES which states as follows:

*“Hinterland Area The Hinterland Area includes the peri-urban areas in the commuter catchment around Dublin, which covers much of the Region extending into parts of the Midlands, into Louth to the north and beyond the Region south into Wexford. The Hinterland includes key county and market towns such as Drogheda, Balbriggan, Navan, Naas, Newbridge, Wicklow and Arklow”*

The Draft RSES states as follows:

*“Growth enablers for the Hinterland area include;*

- *Compact and sustainable growth of towns with 30% of all growth to develop within the existing built up areas*
- *Above national average growth rates to continue, in a more sustainable rate*
- *Consolidation and improvement in the services and sustainability of those areas that have experienced significant population growth*
- *Drogheda as a Regional Growth Centre that will become a self-sustaining regional driver*
- *Focus on improving existing economies and creating the quality of life to attract investment*
- *High value assets and amenities to be protected and their use enhanced for all the Region”.*

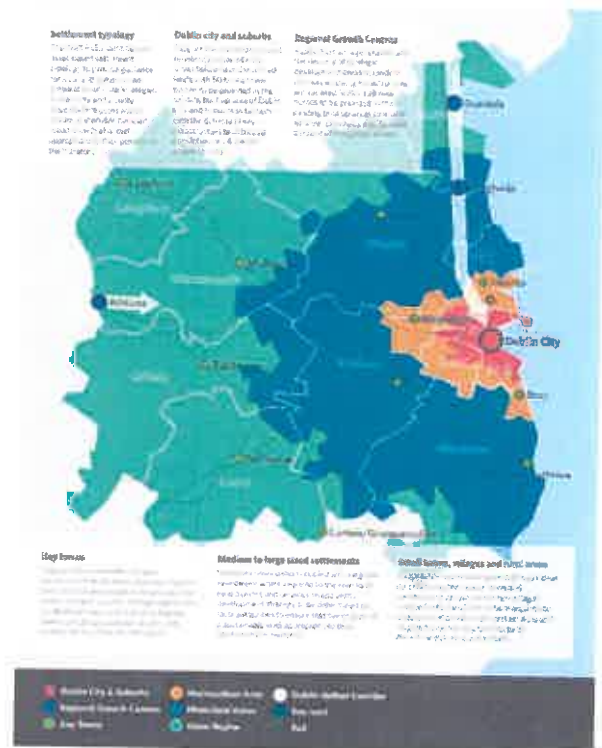
Having regard to the fact that 30% of all growth is required to develop within existing built up areas it the balance of lands should be developed in an orderly and sustainable manner. The subject lands being adjacent to the most recently completed residential development in Navan would constitute the orderly pattern of development.

**Extract from Draft RSES for Eastern and Midlands Region showing Navan as a Key Town.**

#### **“REGIONAL POLICY OBJECTIVES:**

**Key towns RPO 4.22:** *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.*

**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”*



Our client is eager to develop a high-quality residential environment which is attractive, liveable and well designed. The zoning of the subject lands would facilitate the delivery of a high-quality development by established builders in Navan.

Our client's company has an excellent established reputation in house building and are seeking to develop a unique high-quality residential development in accordance with the above policies which would give people access to a high standard quality of life. The location of this site is ideal as it represents the natural expansion of this Key adjoining established newly constructed residential estates and educational facilities and commercial units. Our client aims to deliver a density of residential development which will constitute an attractive alternative to the single house in the countryside. The location is ideal as it is close to all of the town's amenities but its setting is rural in character.

**Existing Housing recently completed adjoining the subject lands.**



The Settlement Strategy for the Region is set out in Section 4.1 of the Draft RSES. Navan is identified as a Key Town in the Hinterland of Dublin City and Suburbs. The Description of Navan is as follows:

*“Large economically active service and/or county towns that provide employment for their surrounding areas and with high-quality transport links and capacity to act as growth drivers to complement the Regional Growth Centres”.*

Having regard to the location of the subject lands within close proximity to the most recently constructed residential development and the landowner's commitment to delivery of houses within the lifetime of the next plan the delivery of these houses would address the housing supply issues in this area.

The subject lands are fully serviceable and are ready to go in terms of their delivery of approximately 150 high quality houses. The applicant has a positive record in terms of house building and is eager to develop the subject lands in a way that would facilitate the appropriate growth of Navan as a primary growth centre.

Section 4.6 states as follows:

*“Navan*

*Navan acts as the county town for Meath and has experienced significant population growth as one of the country’s fastest growing large towns between 1996 and 2016, where the population has grown rapidly without the equivalent increase in jobs.*

*As such, consolidation and regeneration shall be a key priority and objective for the development of Navan town with a focus on the regeneration of the town centre, in particular on sites such as the former County Council Offices at Railway Street.*

*Navan Key town*

*RPO 4.29: Support delivery of the distributor road at Farganstown to release strategic residential and employment lands for development.*

*RPO 4.30: Support the implementation of the Public Realm Plan ‘Navan 2030’ to make the town a more attractive place to live, shop, visit, and do business.*

*RPO 4.31: Support development of a regional hospital to serve the north east of the country.*

*RPO 4.32: Support the extension of the Boyne Greenway to include Navan to promote sustainable transport choices and as a recreation asset for the town, subject to the outcome of the planning process and environmental assessments.*

*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”.*

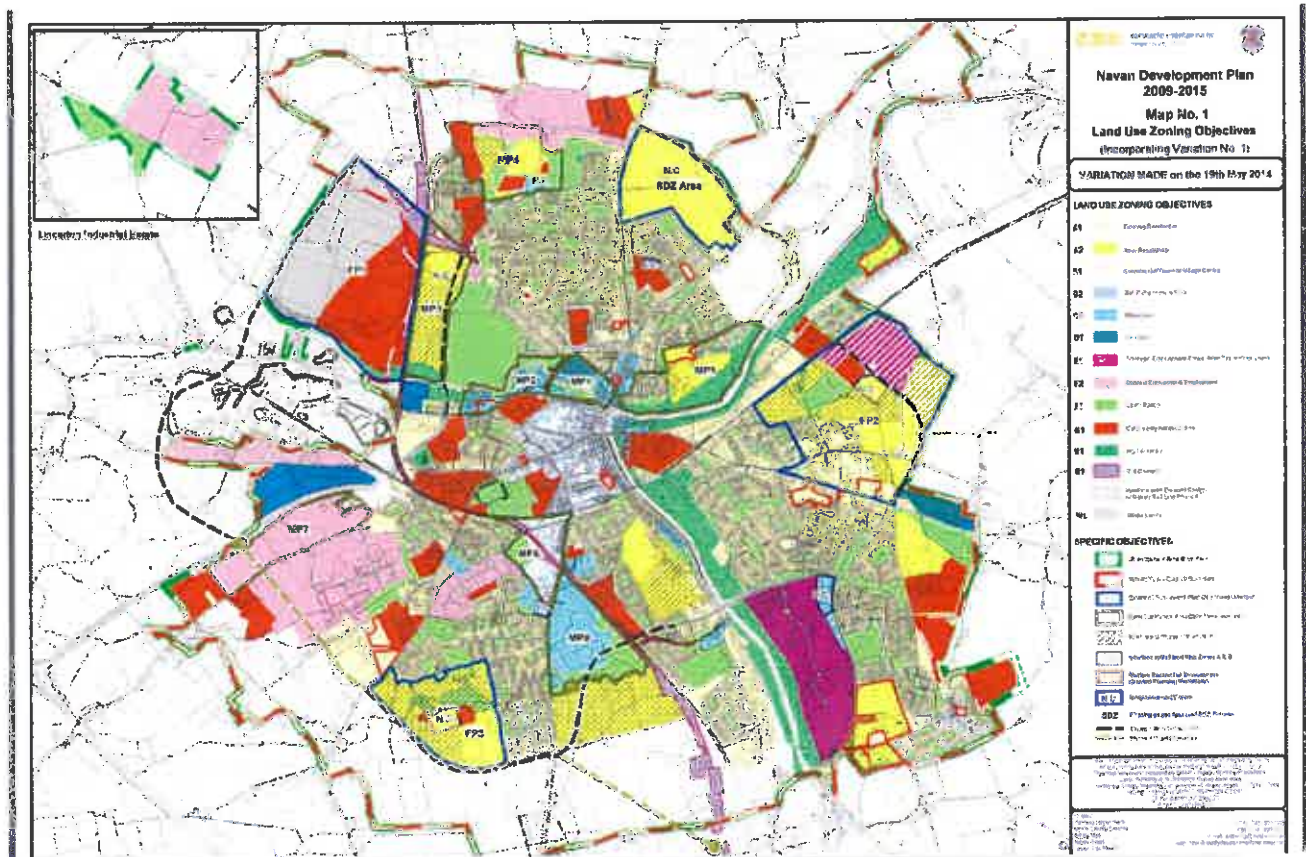
Having regard to the location of the subject lands which are located on an existing Johnstown Distributor Road and are “ready to go” and for multiple residential development it would seem more sustainable and cost effective to support their development than to rely on the expenditure of public finances on the construction of a new distributor road at Farganstown to facilitate housing.

**Justification for Extending Development Envelope and Zoning the Subject Lands:**

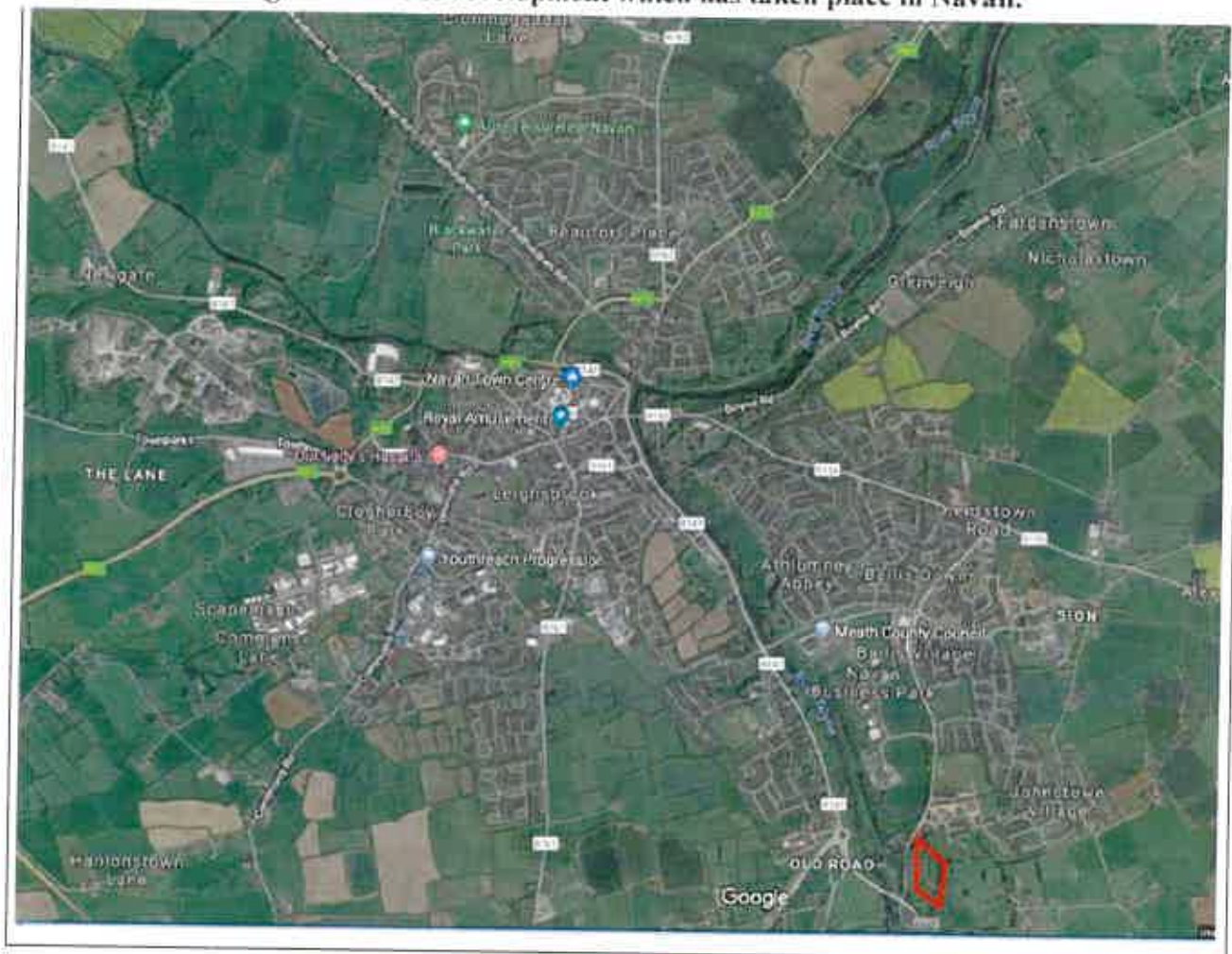
- 1. The inclusion of the subject lands within the Navan Town Boundary and the Zoning of the subject lands would constitute the orderly development of the town in a sequential manner.**
- 2. The zoning of the subject lands would facilitate the early release of residential development by a landowner who has a strong reputation in the construction of houses and who is committed to delivering approximately 150-180 houses within the lifetime of the plan on the subject lands.**
- 3. The existing residential zones adjoining the subject lands have all been developed or are nearing completion.**
- 4. The development of an attractive high quality residential scheme on the subject lands would create a visual gateway to the designated growth town of Navan.**

The aerial photo below and the zoning map will show the majority of residentially zoned lands have been developed. We would submit that there is a shortfall of residentially zoned land available to facilitate the increased demand for residential dwellings in Navan in the future.

**Zoning Map of Navan to compare with aerial photo showing extent of zoned lands which have already been developed or have planning permissions granted for multiple residential development.**



**Aerial Photo showing the extent of development which has taken place in Navan.**



Having regard to the housing shortage in the country and to the demand for additional housing any sites which were zoned in the previous Development Plan but which have not been utilised should be the subject of the “Use it or Lose it” approach. Our client purchased these lands with the aim of developing housing and has a positive record in the delivery of houses. This submission request that he be given the opportunity to develop the subject lands for the purposes of delivering residential development as soon as possible.

A site inspection will show that the majority of residentially zoned lands in the vicinity of the subject site have been developed on or are under construction as can be seen from the photos below.

The subject lands are fully serviceable by water and sewerage and are ideally located relative to Johnstown Centre.

The development of the subject lands in a high quality development would provide a sense of arrival at the entrance to the town.



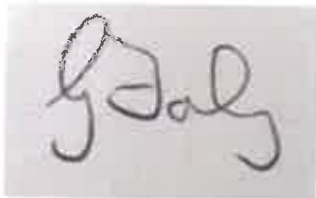
### **Conclusion**

Having regard to the foregoing and to the following:

1. The designation of Navan as a Growth Town
2. The construction of the Johnstown Distributor road to facilitate the release of lands for residential and employment use
3. The location of these lands on the Johnstown Distributor road
4. The pattern of development in the immediate vicinity.
5. These lands are ready to go for development and are not dependent on public funding or the construction of a new road to enable commencement.
6. The commitment of the landowner to deliver housing within the lifetime of the plan.

The development of these lands would accord with the policies of the Draft RSES for the Eastern and Midland Region and we would be obliged if the foregoing would be taken into consideration in the adoption of same.

Yours sincerely,



Geraldine Fahy BA MRUP MIPI

