

Eastern & Midland Regional Assembly,
3rd Floor North,
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rses@emra.ie

Date: 23rd January 2019

Dear Sir/Madam,

RE: DRAFT REGIONAL, ECONOMIC AND SPATIAL STRATEGY – EAST & MIDLANDS AREA

STRATEGIC ROLE OF LANDS AT BETTYSTOWN MEATH WITHIN THE DUBLIN TO BELFAST ECONOMIC CORRIDOR

1.0 INTRODUCTION

- 2.1 We refer to the publication of the Draft Regional Spatial and Economic Strategy (Draft RSES) for the Eastern and Midland region on the 3rd of November 2018. Davy Hickey Properties, 27 Dawson Street, Dublin 2 has instructed John Spain Associates to prepare this submission on their behalf.
- 2.2 At the outset, our client welcomes and supports the publication of the Draft RSES, which will provide the regional framework for the delivery of new dwellings for the East and Midlands region.
- 2.3 Our client, Davy Hickey Properties (DHP) has a significant track record of delivering exceptionally high quality residential and commercial development in the Greater Dublin Area. The DHP group has a proven track record on delivering large scale developments. Having regard to the ongoing shortfall in the supply of housing the subject lands could be developed in the near future if planning permission is granted.

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Summary

2.4 In reference to the Draft RSES, the following is noted:-

- Bettystown, Co. Meath is located on the Dublin to Belfast corridor, which is identified in the Draft RSES as playing a critical role in supporting economic growth and competitiveness. The development of the subject lands for residential purposes will secure the delivery of new homes at a suitable location and contribute to the sustainable growth of the area.
- The adopted RSES should recognise the supporting role that towns such as Bettystown with rail links within the Dublin to Belfast corridor can play in the building of a critical mass of population in the Dundalk/Drogheda area.
- DHP recognise the inherent need for new homes in County Meath at present. Such development should be brought forward at sustainable locations which are accessible to local services and transport links, as well as being associated with existing residential areas and nearby infrastructure which has capacity to support new development.
- It is clear that Bettystown holds significant potential for growth over the period of the next Meath CDP given its accessible location, infrastructure provision and planned improved transport links. Davy Hickey Properties have a reputation for delivering high quality residential development across the Greater Dublin Area and can contribute positively to the organic growth of Bettystown through new housing at the subject site. This will also serve to achieve the objectives of the existing East Meath LAP through the delivery of open space and community infrastructure as part of the wider scheme.
- The lands are a logical extension to neighbouring development, with capacity existing at the local waste water treatment plant. The site has no notable constraints in respect of ownership or physical matters. A strategic road objective is located adjacent to the east which will serve to improve the site's accessibility from and connectivity with the surrounding area as well as increasing road capacity to accommodate residential development at this site. In this respect, the subject lands are ideally located to justify a zoning objective for residential use in the Meath County Development Plan 2019-2025.
- It is submitted that "*a suitable pipeline of development opportunities*" will require flexibility in the allocation of zoned land in the EMA and that this will not be solely based on population figures and that a land based allocation of headroom of 50% as per current practice (in the Development Plan Guidelines 2007), is required to avoid the hoarding of land and/or planning permissions and a future shortfall in land supply for housing.
- Using a solely population based headroom for zoning as is currently suggested would have the potential effect of curtailing sites, which otherwise are appropriate for development. There still needs to be a spatial dimension to how headroom is applied in the quantum of zoned land to take into account (a) the length of time it takes to get zoned land fully serviced, (b) developer/market considerations, and (c) land assembly etc. An additional spatial element to headroom, along with the associated infrastructure review of land, is required to ensure that lands which are serviced, and ready to deliver housing supply, are not artificially constrained.

- Our client is supportive of the inclusion of an asset based criteria (or matrix) for Planning Authorities to use as tool in the determination of land zoning or prioritising, when the review of the core strategies and Local Area Plans occurs after the adoption of the RSES.
- Based on the foregoing, it is respectfully submitted that the extent of lands under ownership of Davy Hickey Properties (c. 18.9 hectares) be identified as having a valuable role in contributing to the housing need for the Greater Dublin Area.
- It is considered that the delivery of growth in the town of Bettystown over this transitional period would be appropriate given the existing capacity of the town to accommodate residential development and population growth, both on foot of existing physical and social infrastructure, and having regard to the location of the subject lands and Bettystown to the Irish Rail network.
- Having regard to the above, it is respectfully submitted that the final RSES should recognise the potential of locations with existing public transport (Bettystown for example), located within the Dublin to Belfast economic corridor to accommodate a higher population growth trajectory during the transitional period, due to its existing capacity for growth, based on existing infrastructure (including social infrastructure) and services.

2.0 SITE LOCATION AND CONTEXT

- 2.1 Davy Hickey Properties owns lands totaling approximately 16.9ha located approximately 1.2km south of Bettystown town centre. The site currently exists as greenfield land immediately abutting adjacent residential development to the south and a recently completed school and education campus to the east. Agricultural land is located to the north and the site bound by the east coast railway line to the west. The site falls in elevation moving east, towards the Irish Sea. Figure 1 notes the location of the site in the context of its surroundings.

Figure 1: Site Location Plan (Google Maps)



3.0 RELEVANT PROVISIONS OF THE DRAFT RSES AND GROUNDS OF SUBMISSION

Relevant Provisions of the Draft RSES

3.1 The overarching vision statement of the RSES is *“to create a sustainable and competitive region that supports the health and wellbeing of our people and places, from urban to rural, with access to quality housing, travel and employment opportunities for all”*.

The Dublin Belfast Corridor

3.2 Our client supports the recognition in the Draft RSES of the crucial strategic role that the Dublin to Belfast corridor plays. The Draft RSES identifies that *“the cities and towns along the corridor home to a population of around 2 million people and that the Eastern Seaboard has seen the highest growth and highest internal migration of our population.”*

Figure 2 Bettystown within Public Transport Network



3.3 The Draft RSES outlines that the corridor links the two largest cities and the large towns of Drogheda, Dundalk and Newry on the island by high-capacity road and

- national rail links and plays a critical role in supporting economic growth and competitiveness.
- 3.4 The adopted RSES should recognise the supporting role that towns such as Bettystown with rail links within the Dublin to Belfast corridor can play in the building of a critical mass of population in the Dundalk/Drogheda area.
- 3.5 The Draft RSES concurs with the Implementation Roadmap for the NPF, in noting that *"the scale of projected population targets for cities means some transfer of projected growth to their wider metropolitan areas is appropriate, particularly during the transition period to 2026."*
- 3.6 Therefore, the Draft RSES notes that as per the NPF Implementation Roadmap, certain local authorities, including Meath may target additional population growth above and beyond the 25% headroom allocated within the figures within the NPF Implementation Roadmap (up to 25% additional growth in addition to the 25% headroom). It will fall to Planning Authorities, including Meath County Council, to allocate this growth – a provision of the draft document which is welcomed by our Client.
- 3.7 It is noted that the Laytown to Bettystown Link Road was secured through a Part 8 scheme, which will facilitate development in the area. Our client assisted MCC in the delivery of the link road.
- 3.8 The NPF specifically targets the provision of development on, and the zoning for development of, lands which are fully serviced and 'ready to go', in order to allow for efficient housing delivery (particularly in current housing market conditions with significant undersupply).
- 3.9 Our client welcomes the recognition within the Draft RSES that RSES concurs with the Implementation Roadmap for the NPF, in noting that *"the scale of projected population targets for cities means some transfer of projected growth to their wider metropolitan areas is appropriate, particularly during the transition period to 2026."*

Use of Headroom

- 3.10 The Draft RSES notes that *"Practice in relation to previous Regional Planning Guidelines (RPGs) and core strategies, has generally been to match future population targets to the physical extent of land being zoned for development, based on assumptions related to density and household occupancy. A further factor of 50% of the identified land requirement has also been universally applicable as 'headroom'."*
- 3.11 The Draft RSES further notes that the concept of headroom based solely on zoned land provision does not account for housing yield arising from the re-use of existing housing stock, mixed-use development, urban intensification or infill or brownfield development. It is submitted that the core strategies of County Plans does take into account infill and regeneration sites in how land is allocated for development. As such Local Authorities are familiar with reviewing sites and making judgement on which sites are appropriate for development. Artificially constraining Local Authorities to a solely population based headroom, may lead to sites which are appropriate for development (from an asset based review), not being considered appropriate, due to perceived ceiling of a population threshold.

- 3.12 According to paragraph 4.14 of the 2007 Development Plan Guidelines for Planning Authorities, planning authorities have generally made provision for 50% more zoned land than is required to meet demand during the six-year lifetime of a Development Plan i.e. sufficient land for a further three years, in accordance with development guidance. This is known as 'headroom'. However this current headroom calculation is based on 50% additional land, which is different to the NPF and IR, which has allocated headroom based on the population growth rate. This different methodology, has material implications in respect of the future zoning allocations arising from the review of County Plans and LAPs, and could result in a reduction in the zoned land in some counties.
- 3.13 While our client is supportive of a robust analysis of land for the purposes of the delivery of sustainable housing, it is incumbent that at a time of housing shortages, within the EMR, that there is not an artificial constraint on the delivery of housing, which would accrue if the current land based 50% is not used. This is particularly so where it can be demonstrated that the lands are serviced, or capable of being serviced, in the short term.

4.0 RATIONALE FOR LANDS AT BETTYSTOWN IN MAKING A CONTRIBUTION TO THE DELIVERY OF HOMES

- 4.1 In respect of the NPF Tiering approach, the subject site is considered to constitute Tier 1 Zoned Lands as 'there are basic development services i.e. road or footpath access including lighting, drainage connectivity (foul or surface water systems) and water supply available, all of which have capacity to accommodate development to some extent, at the boundary of the zoned lands. This means that a planning application for the development may be considered during the life of a development or area plan'.
- 4.2 The lands are a logical extension to neighbouring development, with capacity existing at the local waste water treatment plant. The site has no notable constraints in respect of ownership or physical matters. A strategic road objective is located adjacent to the east which will serve to improve the site's accessibility from and connectivity with the surrounding area as well as increasing road capacity to accommodate residential development at this site. In this respect, the subject lands are ideally located to justify a zoning objective for residential use in the Meath County Development Plan 2019-2025. It is also noted that elsewhere within Bettystown lands substantial tracts of land are identified as comprising a flood risk.
- 4.3 As observed, the site possesses the following positive attributes:
- Centrally located within the settlement;
 - Can provide community open space;
 - Immediately adjacent to three schools;
 - Will contribute to delivery of planned new road infrastructure;
 - Within 500m of nearest bus stop;
 - Within 1km of local convenience retail provision;
 - Accessible to Bettystown town centre, 1.2km north;
 - Existing train station at Laytown 1.2km south;
 - Planned train station approximately 1.1km north west;
 - Potential contribution to meet needs for communal open space lands and facilities;
 - Serviced by all necessary infrastructure;
 - Immediately adjacent to existing development to the south and east;

- No flood risk constraint.
- 4.4 The period 2006-2016 saw an increase in population of circa 16% in Meath with the Regional Planning Guidelines assigning a housing target of 13,738 for the county in this period. In light of the substantial number of committed unbuilt units (1,414) at December 2014, the current Meath CDP allocates 0.7% of the total county housing requirement (12,942) to East Meath for the period 2013-2019 (100 units).
- 4.5 This figure is reflected in the East Meath LAP 2014-2020, however it is important to note that this low number reflected the 1,414 already committed units in the East Meath area in 2014. Assuming the committed units are constructed, this will result in 1,514 additional dwellings delivered in the period to 2019 in East Meath. It is therefore submitted that assuming short term growth rates remain steady in the period 2019-2025, a minimum of 1,514 units will be required, equating to c.252 units per year.
- 4.6 If current growth rates of at 9% continue to 2026, which is considered highly likely attributable to the town's strategic location and improved connectivity, it will result in an increase in population of 1,069. This is considered a conservative increase. Based on predicted household size of 2.35 in 2022, an allocation of 490 dwellings would be required in the CDP period 2019-2025 inclusive of the outstanding 35 units noted above. Including the 50% headroom required by current guidelines, a minimum of 735 units would be required. Based on residential density levels of 25 units per hectare as stated within the current East Meath LAP, this would require an additional c.29ha of residential land to be identified in the period to 2025.
- 4.7 These lands were previously zoned residential and changed to white zoning which set aside for longer term residential development. Only white lands in Bettystown, scoring chart etc. Identified as next best location previously so logically next best site. One of criteria it was marked down on was the road which is now imminent.

4.0 CONCLUSIONS

- 4.1 It is clear that Bettystown holds significant potential for growth over the period of the next Meath CDP given its accessible location, infrastructure provision and planned improved transport links. Davy Hickey Properties have a reputation for delivering high quality residential development across the Greater Dublin Area and can contribute positively to the organic growth of Bettystown through new housing at the subject site. This will also serve to achieve the objectives the existing East Meath LAP through the delivery of open space and community infrastructure as part of the wider scheme.
- 4.2 Based on the foregoing, it is respectfully submitted that the extent of lands under ownership of Davy Hickey Properties (c. 16.9 hectares) be identified as having a valuable role in contributing to the housing need for the Greater Dublin Area.
- 4.3 We respectfully request the Eastern Regional Authority takes this submission into account and to include the proposed alterations into the adopted Regional Spatial Strategy for the East and Midlands Regional Authority.

Yours Faithfully,



John Spain Associates