

Submission

On the

**Draft Regional Spatial and Economic Strategy for the
Eastern and Midlands Regional Assembly**

On behalf of

Rockture 1 Limited

To

*Eastern & Midland Regional Assembly
3rd Floor North, Ballymun Civic Centre
Main Street
Ballymun
Dublin 9
D09 C8P5*

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John Spain Associates

Planning & Development Consultants
Chartered Town Planners & Chartered Surveyors

39 Fitzwilliam Place
Dublin 2 D02 ND61
www.jsaplanning.ie

1.0 INTRODUCTION

- 1.1 On behalf of our client, Rockture 1 Limited, Unit 2, Block B, Blanchardstown Corporate Park, Dublin 15, we wish to make a submission on the Draft Regional Spatial and Economic Strategy for the Eastern and Midlands Regional Authority.
- 1.2 John Spain Associates have previously made a submission on the pre-draft stage of the Strategy preparation process (in early 2018). The current submission does not seek to reiterate at length the grounds of submission previously set out at the pre-draft stage, but rather seeks to deal more specifically with the Draft RSES document which has now been published.
- 1.3 For ease of reference, the grounds of submission raised at pre-application stage can be briefly summarised as follows:
- The town of Dunshaughlin, County Meath, is currently designated for growth as a Moderate Sustainable Growth Town within the Regional Planning Guidelines for the Greater Dublin Area.
 - Growth targets set out within the Draft National Planning Framework, provided for growth on average of 15% targeted for ‘small towns’ with a population of less than 10,000 people over the NPF operational period to 2040.
 - The submission made the case that the level of growth prescribed for ‘small towns’ should be based on criteria including the availability of infrastructure and services to sustain higher growth rates, particularly relative to a settlements current population, its location within the region and its potential to create sustainable communities. It is submitted that the RSES should recognise the need to target growth in towns which have capacity to support significant population increase.
 - It was submitted herein that towns with population of less than 10,000 that have potential to support sustainable population growth should be designated as ‘for an appropriate level of sustainable growth under the RSES’, particularly those on previously identified as Moderate Sustainable Growth Towns.
 - It was further submitted that the town of Dunshaughlin in County Meath constitutes such a town, with existing social and physical infrastructure to provide for compact and sustainable development and population growth over the lifetime of the RSES.
 - Dunshaughlin benefits from strong public transport provision, capacity for growth in terms of services (including water and wastewater), and ample provision in terms of schools and other facilities and social infrastructure.
 - On that basis, it was submitted that Dunshaughlin has the potential to accommodate a population of 8,000 or more, based on a planned and compact expansion of the town in tandem with significant employment growth in order to ameliorate long-distance commuting from the town.
- 1.4 Our client recently lodged an application for a significant strategic housing development, including a neighbourhood centre, on lands to the east of Dunshaughlin town centre, comprising a continuation of ongoing residential development on our client’s lands in the town. The application, under Reg. Ref.:

ABP – 303433-19 comprises 913 residential units (including apartments, duplex units and houses), along with a neighbourhood centre, childcare facility, high quality areas of open space, and associated site works.

- 1.5 The proposed SHD development would accommodate c. 2,370 persons based on an average household size of 2.6. Dunshaughlin has a relatively low population base at present, relative to other Moderate Sustainable Growth Towns in the County and relative to its strategic location on the M3/N3 Economic / Transport Corridor, and the town has significant capacity and potential for residential and associated employment growth, which will occur concurrently with sustainable, compact residential growth.
- 1.6 Our client's lands (on which the SHD development is currently proposed) are zoned, located within the development boundary of Dunshaughlin and in the ownership of a housebuilding company who can provide a small element of the housing provision needed in the state over the short to medium term to respond to natural and pent-up housing demand. As will be set out in this submission, Dunshaughlin is considered to be an appropriate and strategic location which could accommodate a higher growth trajectory during the transitional period provided for in the NPF Implementation Roadmap for the RSES.

2.0 RELEVANT PROVISIONS OF THE DRAFT RSES AND GROUNDS OF SUBMISSION

Relevant Provisions of the Draft RSES

- 2.1 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"*.
- 2.2 Dunshaughlin would fall within the Medium to Large Town category of the settlement typology provided as Table 4.1 of the draft document, and the relevant County Development Plan will allocate future growth to such towns which is considered an appropriate solution. The Draft RSES identify Dunshaughlin as a Town / District Centre and a Key Service Centre in Co. Meath, along with the towns of Ashbourne, Kells, and Trim, within the Retail Hierarchy for the region.
- 2.3 Dunshaughlin is identified within the hinterland area of the Region, close to the boundary of the Dublin Metropolitan Area.
- 2.4 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."*
- 2.5 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.

- 2.6 Dunshaughlin is identified within Table 6.1 of the Draft Document (page 98) as a town centre which functions as a key service centre within the retail hierarchy of the EMRA, reflecting the level of services located within the town which serve the immediate built up area of the town and the surrounding area.

Grounds of Submission

- 2.7 Dunshaughlin is well placed and serviced to provide for sustainable and compact growth. The town accommodates a range of services (both physical and social), and lands adjacent to the site of the recent SHD application made by our client have been identified for a new educational campus by the Department of Education.
- 2.8 The town is strategically located on a high-quality bus corridor with links to Pace Rail Station and onward to Dublin City Centre. It is also located on the M3 economic corridor with good connectivity to substantial areas of employment, such as Dublin Enterprise Zone in the Dublin 15 area north of Blanchardstown Major Town Centre.
- 2.9 Rebuilding Ireland – The Government’s Action Plan on Housing and Homelessness and the National Planning Framework – Ireland 2040 support the need for residential development such as that proposed on sites in close proximity to quality public transport routes and within existing urban areas.
- 2.10 It is noted that in the short term to 2020, the Housing Agency has identified a need for at least 25,000 new homes every year up to 2020, which does not include for additional pent-up demand arising from undersupply of new housing in recent years. As noted above, the lands in our client’s ownership in Dunshaughlin can play a small part in delivering much needed housing in the short to medium term.
- 2.11 In the longer term to 2040, the NPF projects a need for a minimum of 550,000 new homes, with up to half of this number targeted for provision in existing urban settlements outside Ireland’s five cities. The NPF also signals a shift in Government policy towards securing more compact and sustainable urban development, which requires at least half of new homes within Ireland’s cities to be provided within existing urban areas. A significant and sustained increase in housing output and apartment type development is necessary to meet such targets.
- 2.12 Meath County Council support the much-needed delivery of a substantial quantum of housing at Dunshaughlin in accordance with the proper planning and sustainable development of the town, and particularly to support the future delivery of an extension of existing rail links to Navan, via Dunshaughlin, a key piece of infrastructure for Co. Meath which will also serve to improve the breakdown / ratio of transport modes currently observed for residents in the county by encouraging a shift away from private care use. This rail link is noted

of employment uses on the significant landbank of employment zoned lands existing at Dunshaughlin.

- 2.17 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.”* This approach to transition is considered to be appropriate
- 2.18 It is considered that the delivery of growth in the town of Dunshaughlin 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 forthcoming investment in facilities for the town by central Government in the form of a new educational campus on lands within our client’s ownership, located immediately adjacent to the site of the current SHD application.
- 2.19 Having regard to the foregoing, it is respectfully submitted that the final RSES should recognise the potential of Dunshaughlin to accommodate a higher growth trajectory during the transitional period, due to their existing capacity for growth, predicated on existing / committed infrastructure and services. This in turn will help support the long-term objective of delivering the rail line to Navan, with a station at Dunshaughlin.

3.0 CONCLUSION

- 3.1 We would be grateful if this submission could be given consideration during the preparation of the final RSES for the Eastern and Midlands Regional Authority.
- 3.2 This submission has set out the relevant provisions of the Draft RSES document, as it pertains to the town of Dunshaughlin, Co. Meath, and has set out grounds of submission on the draft document.
- 3.3 We look forward to a favourable response from the Authority in relation to the above and if you require any further information please do not hesitate to contact us.

Yours Faithfully,


John Spain Associates