

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

22 January 2018

Re: Submission on Draft Regional Spatial and Economic Strategy for the Eastern and Midland Region.

Dear Sir/Madam,

This submission is made on behalf of Groveview Limited, Block 20 B, Beckett Way, Parkwest Business Park, Dublin 12 in response to the Assembly's request for submissions on the Draft Regional Spatial and Economic Strategy for the Eastern and Midland Region (draft RSES). Groveview Ltd controls a strategic residential landbank at Haynestown with an extant permission for over 1,000 residential units and on which permitted road and water services infrastructure has been completed to accommodate in excess of that quantum of development, and on which residential development is ongoing. The location of this landbank is identified on Figure 2, below. The draft RSES directs significant population and economic growth towards Dundalk as a key Regional Growth centre designated to grow to city scale, on the basis that growth is *'critical to the implementation of effective regional development as set out in the NPF'* (Section 4.5).

Regional Policy Objective RPO4.15 requires the preparation of an Urban Area Plan (UAP) for Dundalk to stimulate and guide the growth of the town to city scale. If Dundalk is to fulfil its national and regional roles assigned by the NPF it is imperative that the preparation of the UAP is informed by the active land management principles set out in the NPF and national policy. These principles require the identification and prioritisation of Tier 1 serviced sites that are known with reasonable certainty to be capable of delivering the quantum of development required by the Core Strategy within the lifetime of the UAP.

RPO4.15 identifies some locations that may be suitable to accommodate the compact and sustainable expansion of the town, to inform the preparation of the UAP. All but one of the areas identified are located in the core area where infill development and rejuvenation is required to achieve a minimum of 30% of the planned growth. Lands at Mount Avenue are the only area identified for future urban expansion outside of the core urban area and established urban footprint. Given the scale of growth required to meet national and regional objectives, and to enable the application of active land management principles, it is proposed that RPO4.15 is amended to include reference to other Tier 1 serviced and serviceable residential lands in Dundalk, including *inter alia* the lands at Haynestown.

In this regard, this submission proposes that RPO4.15 is amended to include the following reference in bold:

- *Facilitate Urban Expansion through development of the Mount Avenue masterplan lands, and lands at Haynestown on which roads and water services infrastructure have been provided to enable ongoing sustainable urban expansion.”*

This proposed amendment is supported by the following planning and sustainable development considerations:

1. The lands are **Tier 1** fully serviced lands with an extant planning permission of over 1000 units, on which development of housing has substantially commenced, and on which all principal roads and all water services infrastructure to service in excess of that quantum of development has been completed. In this way, the site is deliverable and is not constrained by physical, environmental or market factors.
2. The lands support the coherent and sequential development of Dundalk, being an emerging polycentric centre centred on and around the town centre, the 'Louth Pharma Hub' and major employment centres, Dundalk DIT, and Blackrock urban centre.
3. An analysis of zoned and serviced lands that have the capacity to accommodate the scale of development required over the short to medium term establishes that the Haynestown lands can play a critical role, and will be required, to meet national and regional growth and sustainable development objectives.

Figure 1. Aerial Image of Haynestown Site Identifying Completed and Ongoing Development



Figure 2. Location of Haynestown Landbank.



[Note: The base aerial photograph is dated and does not include development completed on the site and major employment development on sites to the north.]

1.0 Planning Status of the Haynestown Lands

The National Planning Framework (NPF) provides a two-tier methodology for designating land for development within the lifetime of statutory land use plans. National Policy Objective 72a states that for the purposes land use zoning, planning authorities will differentiate between i) zoned land that is serviced and ii) zoned land that is serviceable within the life of the plan. Tier 1 'Serviced Zoned Lands' comprises areas that are able to connect to existing infrastructure services and can therefore readily accommodate new development. The availability of services including foul sewer drainage, surface water drainage, a potable water supply and public lighting is central to the Tier 1 designation. Spatially, Tier 1 lands are located within or contiguous to the existing built up footprint of a settlement.

The Haynestown lands constitute Tier 1 'Serviced Zoned Land'. Significant investment has already occurred to fully service the site. Groveview Ltd and Louth County Council have invested €9.4 million and €4.1 million in completed infrastructure, respectively. Figure 3 below identifies the infrastructure and enabling works that have been completed on the Haynestown lands, with capacity to accommodate in excess of the permitted 1,000+ dwellings.

Figure 3. Overview of Infrastructure and Enabling Works undertaken at Haynestown Development Site



The Western Relief Road constructed by Groveview Ltd connects Marlbog Road in the north to Clermont Road in the south to fully enable the development of the Haynestown landbank. The Western Relief Road includes three roundabouts, bus bays and local road realignments, footpaths/cycling lanes, street lighting and improved service infrastructure. Purpose-built development access points have been constructed on the Western Relief Road and the Dublin Road.

Other completed infrastructural works include a pumping station in the south-eastern corner of the site, the realignment and widening of the Marlbog Road, upgrades to the Dublin Road, and an internal service road that runs into the centre of the site from the Dublin Road.

Mains drainage, water and electricity/gas are routed into the site and available for connection to the lands. In addition, local services have sufficient capacity to facilitate development of housing units and those services can be connected as required.

These infrastructural works were permitted under Reg. Ref. 03/1754, which provided for the construction of 1,392 units, a neighbourhood centre with commercial uses, community uses and services, and sites reserved for a primary school and childcare facilities. The provision of all enabling infrastructure at the site was prioritised to ensure deliverability, and residential development is now being provided. Some 112 of the 255 no. units (comprising 2, 3 & 4 bed homes) permitted under Ref. PL15.233961, an amendment to the parent permission, are under construction with the first phase of units being substantially complete. The first residents are expected onsite in March/April 2019. The remaining 143 units under this permission are scheduled for completion over the next 2 years. On lands on the northern side of Marlbog Road, 78 dwellings have been completed and 40 no. units are currently under construction under Ref. 03/1754. The parent permission expires in April 2020, and it is anticipated that 302 dwellings will be completed by that date at Marlmount. To facilitate the completion of the development of the serviced landbank it will be necessary to secure further planning permission(s). As such, it is important that the UAP appropriately designates the Haynestown landbank to accommodate the completion of new residential area.

Accordingly, given the current planning, active and serviced site status of the landbank, and the demonstrated capacity to deliver residential development, it is submitted that it is appropriate to include the reference to the Haynestown landbank in RPO4.15, as proposed.

2.0 Strategic Importance to the Planned and Coherent Expansion of Dundalk

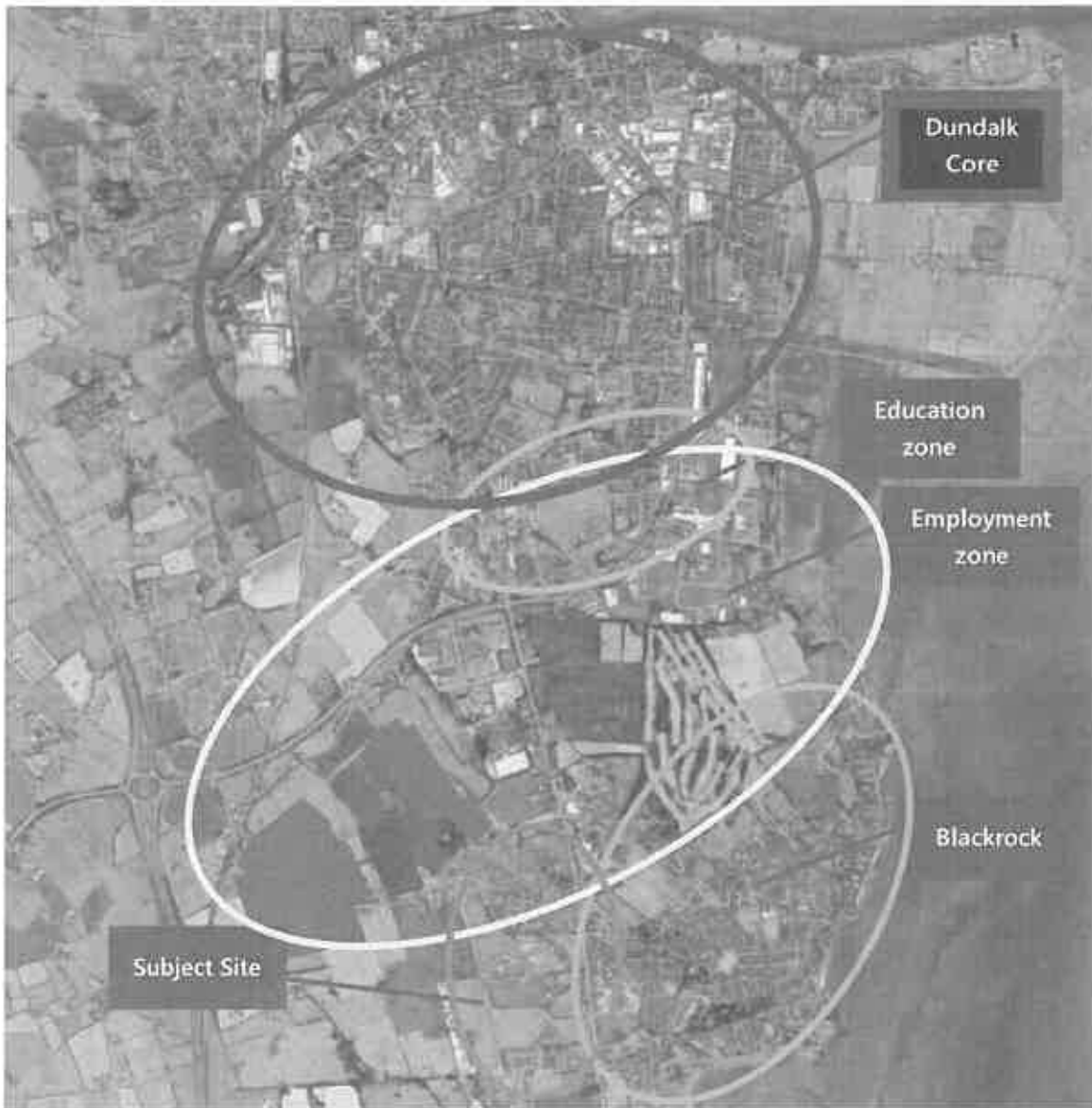
The lands support the coherent and sequential development of Dundalk, being an emerging polycentric urban area centred on and around the town centre, Blackrock urban centre, Dundalk IT, the 'Louth Pharma Hub' and major employment centres including the Xerox Technology Park.

The draft RSES acknowledges that '*Dundalk has a strong economic and employment base with a healthy equilibrium between resident workers and jobs and an established 'Louth Pharma Hub'. Furthermore, the presence of Dundalk Institute of Technology provides a key driver for an enterprise ecosystem along with the existing sectoral clusters'* (Section 4.5). Dundalk is strategically located between the economic nodes of Dublin and Belfast, and has been the subject of significant Foreign Direct Investment. Dundalk is recognised as an emerging hub for new knowledge based and pharmaceutical sectors and already houses multinational companies including, but not limited to, National Pen, PayPal, Xerox, Wasdell and Prometric. WuXi Biologics

have also recently confirmed their intention to construct a new manufacturing facility on IDA lands in Mullagharlin.

The Haynestown lands are strategically located with regard to these major employment and education centres, and to Blackrock urban centre and the Dundalk urban area.

Figure 4 Strategic Location of Haynestown



[Note: The base aerial photograph is dated and does not include development completed on the site and major employment development on sites to the north.]

Figure 4 identifies the proximity and accessibility of Haynestown to Blackrock, established employment and educational hubs, and the Dundalk urban area. Haynestown is accessible by sustainable modes to Xerox Business Park, IDA Finnabair Industrial Estate, the IDA Science and Technology Park, and the Clermont Business Park to the west. Dundalk I.T is within comfortable cycling distance at 2.5 kilometres.

Blackrock urban centre is within 1 kilometre and supports a variety of social infrastructure including a community centre, nursing home, dental practice, two GP surgeries, Garda station, schools, a credit union and two churches. Cafes, restaurants, pubs and various shops including a pharmacy and several grocery stores are clustered along the seafront. Dundalk town centre is within 4 kilometres of the site, and is readily accessible by bike or public transportation.

The lands are of sufficient scale and capacity to accommodate shops, services and community facilities to support a sustainable residential community. The extant permission (Ref. 03/1754) includes a neighbourhood centre and commercial uses, a primary school site and childcare facilities. This sustainable neighbourhood approach supports the emerging polycentric development model for Dundalk, with Blackrock and Haynestown performing complementary roles as 'urban villages' within the Dundalk urban area.

These urban villages are supported by everyday services and community facilities within walking distance of the majority of the residents, as provided for under the 'Guiding Principles for Integration of Land Use and Transport' of the draft RSES and the '10 minute' settlement concept.

Haynestown is also well serviced by public transport facilitating a sustainable modal share. Existing bus stops within 100 metres of the entrance to the lands provide direct routes to Dundalk and Drogheda via Bus Eireann routes 100 and 168. The regular Bus Eireann express route 100X connects Dundalk and Dublin and stops at Dundalk I.T. and the town centre. Matthews, a private coach company with stops at Dundalk I.T. and Dundalk town centre offer regular commuter routes from Dundalk to Dublin including routes; 900, 901, 902, 903 and 904.

Haynestown is a strategically located Tier 1 Serviced and active development site that is and can continue to make a significant contribution to achieving national and regional housing targets, in accordance with the objectives of the NPF and draft RSES. Groveview Ltd is a housebuilder of scale with a track record of delivering units, with Haynestown being one of a small number of active development sites to deliver housing in Dundalk in the last ten years. Given the objective for Dundalk to grow to city scale, and to provide the necessary housing to support existing and future employment investment in the city, it is imperative that landbanks such as Haynestown at sustainable locations that can deliver significant housing in the short to medium term, are appropriately identified in the draft RSES, as proposed.

3.0 Population Growth and Residential Development in the draft RSES

An analysis of zoned and serviced lands that have the capacity to accommodate the scale of development required over the short to medium term establishes that the Haynestown lands can play a critical role, and will be required, to meet national and regional growth and sustainable development objectives.

As one of three Regional Growth Centres identified in the draft RSES, Dundalk is to act as a key driver for economic growth in the Region. To reflect the status of the town, the draft RSES states that the population of Dundalk is envisaged to grow from c39,000 to city scale of 50,000 persons by 2031. As such, Dundalk must accommodate population growth of c11,000 in the medium term¹

¹ In the draft RSES the immediate short term is the period up to 2021, the short –medium term is from 2021 to 2026, the medium term is from 2026 to 2031 and the long term is the period post-2031.

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