

## Heather Cooke

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**From:** James Leonard <[REDACTED]>  
**Sent:** 23 January 2019 10:19  
**To:** RSES  
**Subject:** Castlethorn Submission on Draft RSES for the Eastern & Midland Region  
**Attachments:** Castlethorn Submission of Draft RSES for Eastern & Midland Region 23.1.19.pdf

**Importance:** High

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

To Whom It May Concern;

Please find attached submission from Castlethorn with respect to the Draft Regional Spatial & Economic Strategy for the Eastern & Midland Region.

I trust that an acknowledgement of this submission will be made in due course.

Regards,

James

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**James Leonard**  
Senior Project Manager - Planning

## Castlethorn

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**Building Homes – Building Communities**

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# Castlethorn

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3<sup>rd</sup> Floor North  
Ballymun Civic Centre  
Main Street  
Ballymun  
Dublin 9  
D09 C8P5

23<sup>rd</sup> January 2019

**RE: SUBMISSION WITH RESPECT TO EASTERN & MIDLAND REGIONAL ASSEMBLY  
DRAFT REGIONAL SPATIAL & ECONOMIC STRATEGY**

Dear Sir or Madam,

I write on behalf of Castlethorn, a major landowner and residential developer in the Greater Dublin Area, to set out our thoughts and comments with respect to the Draft Regional Spatial & Economic Strategy (RSES) for the Eastern & Midland Regional Assembly Area. Castlethorn have been responsible for the delivery of over 10,000 dwellings across the Greater Dublin Area since the early 1990s and we are currently active on half a dozen sites constructing circa 1,000 dwellings. We set out our thoughts below with respect to this draft regional Strategy using the same broad section headings as contained in the draft document.

## **GROWTH STRATEGY**

We fully support the recognition that the delivery of identified strategic development areas along high-quality public transport corridors, in tandem with the delivery of associated infrastructure and enabling services, is a key growth enabler in the Dublin Metropolitan Area to ensure a steady supply of sustainable sites. This would include designated Major Urban Housing Development sites (MUHDs) and other strategic landholdings subject to existing or planned Local Area Plans (LAPs) and/or Strategic Development Zones (SDZs).

We would however respectfully suggest that the potential of towns within the Hinterland, below the hierarchy order of Key or County Town, have significant potential to deliver growth, which should be recognised in Figure 3.1 in a similar vein to that stated with respect to such smaller towns in the Outer Region. The key consideration in this context should naturally relate to the physical and social carrying capacity of particular towns, and locations therein, including proximity to existing or planned public transport and indeed local employment opportunities.

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## SETTLEMENT STRATEGY

We note the reference to Appendix B in terms of the population projections to be applied by Local Authorities in preparing the core strategies of development plans to be *“informed by the transitional population projections methodology set out in the NPF Roadmap, and a robust evidence-based analysis of demand, past delivery and potential.”* We would submit that this is an important guiding statement allowing for some modest upward adjustment to national baseline average population projections having regard to established demographic trends within individual counties. The concluding part of the aforementioned statement would apply more locally and at the discretion of the Planning Authority presumably in identifying particular locations where demand is clearly evident, there is a track record of housing delivery and there is adequate infrastructural carrying capacity for additional residential growth.

The population projections within the County Population Tables in Appendix B, as inherited from the National Planning Framework, are very conservative and deliberately so in an attempt to focus residential development away from the Greater Dublin Area (GDA) to Cork, Limerick, Galway and Waterford. We would submit that it is essential that zoned, serviced land at locations with good physical and social infrastructure and particularly those close to existing or proposed public transport within the GDA should not be artificially constrained from accommodating sustainable residential development in the immediate to short term, in order to help alleviate existing housing shortages.

We would support the ‘Asset-Based Approach’ used in framing the Settlement Strategy and would support such an evidence-based and transparent approach being applied by individual Planning Authorities in preparing their core strategies. This is particularly relevant we would submit when it comes to trying to prioritise towns and landholdings and particularly those Small, Medium and Large Towns and locations therein most suited to and capable of accommodating housing allocations within the Hinterland Area. This is further reinforced on Page 42 & 43 of the Draft Strategy where active land management is called for having regard to actual delivery performance to-date, capacity of services and the likely rate of take-up and completion of permitted residential development schemes having regard to local conditions and trends.

Given the limited and more targeted housing allocations to the Greater Dublin Area going forward it is essential that the right locations are chosen where residential development will be delivered expediently. Locations where there is spare capacity in existing water supply, foul drainage and roads infrastructure can facilitate a quick development turnaround and facilitate the realisation of more affordable housing due to a reduced infrastructural cost burden to be borne by such developments. Such cost efficiencies coupled with good supporting social infrastructure can help deliver affordable and sustainable housing to help meet existing supply shortages and ensure that the target housing allocations under the draft Regional Spatial & Economic Strategy are being proactively met and delivered on-site within each County.

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## CONNECTIVITY

The importance of transport connectivity and integrated land use and transportation planning is rightly emphasised in the strategy and we are pleased to see the planned new rail stations at Pelletstown and Woodbrook (where we have significant interests) identified and supported in Table 8.2 of the draft RSES. We are further encouraged by and supportive of the recognised reappraisal of the extension of Dunboyne/M3 Parkway line to Dunshaughlin and Navan as planned by the NTA as part of their 6-year review of the Transport Strategy for the GDA. This is an important rail project that would address the fact that Navan is the only County Town within the GDA that does not have a rail service. Navan and Dunshaughlin, albeit to a lesser extent, has significant potential for further growth and we would be hopeful that the NTA commits to the delivery of this long-planned rail project in the medium term.

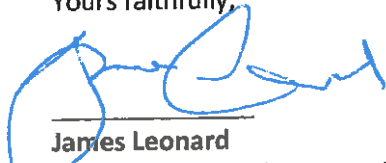
## CONCLUSIONS

We are broadly supportive of the draft RSES as it relates to lands and locations where we have significant landholdings. We would be concerned however at the potential implications of the broad policy position (of the National Planning Framework primarily) of seeking to suppress growth within the Greater Dublin Area. We would urge the Assembly to ensure that within the final document that there is some flexibility, a continued recognition of existing demographic trends and demands and capitalisation on the considerable State and private investment in physical and social infrastructure to-date within Dublin, based on its national and international importance and perennial resilience as a highly desirable place to live, work and visit and its role as an economic engine for the State.

We note the commitment to monitoring and formal review of this regional strategy, which we believe is crucial to ensure that there are no unforeseen and unduly negative implications of this emerging national and regional strategy that could inadvertently compound housing supply shortages and impact on our international competitiveness as a nation and on the quality of life of its citizens.

We trust that the broad points made in this submission will be given due consideration in the formalisation of the Regional Spatial & Economic Strategy for the Eastern & Midland Region.

Yours faithfully,



**James Leonard**

Chartered Town Planner and Senior Project Manager

*For and on behalf of Castlethorn*

