

Rory Kunz

From: Rory Kunz
Sent: Wednesday 23 January 2019 14:24
To: 'rses@emra.ie'
Subject: re: Submission to Draft RSES - DHP Navan
Attachments: 17160 DraftRSESDV1_23-1-2019.pdf

Importance: High

Dear Sir/Madam,

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 (attached) submission on their behalf.

Please confirm receipt of submission at your earliest convenience.

Best regards,
Rory

Rory Kunz, Executive Director,
John Spain Associates,
39 Fitzwilliam Place,
Dublin 2,
D02 ND61.

T: 01 662 5803
M: 087 322 5858
e-mail: RKunz@johnspainassociates.com
web: www.jsaplanning.ie



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Eastern & Midland Regional Assembly,
3rd Floor North,
Ballymun Civic Centre,
Main Street,
Ballymun, Dublin, D09 C8P5
rses@emra.ie

Date: 23rd January 2019

JSA Ref: 17160

Dear Sir/Madam,

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

SUBMISSION IN RELATION TO THE ROLE OF NAVAN IN DELIVERING HOUSING FOR THE RSES

1.0 INTRODUCTION

- 1.1 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.
- 1.2 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.
- 1.3 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 short term.

Managing Director: John P. Spain BBS MRUP MRICS ASCS MRTPI MIP

Executive Directors: Paul Tuohy BA MRUP Dip Environmental & Planning Law MIP ROY KU11Z BA (MOD) MS-ERM MAT&CP Dip EIA Mgmt MIP

Stephen Blair BA (Mod) MRUP MIP Mary Mac Mahon MSc TCP Pg Dip MSP Pg Dip Env Eng Dip Env Plg Law Dip Mgmt Dip EIA & SEA B Sc Sc MIP

Associate Directors: Stephanie Byrne BA MRUP MIP, Niall Byrne BSc(Hons) MSc MRTPI MIP

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Registered in Ireland No. 396306. Registered Office: 39, Fitzwilliam Place, Dublin 2. VAT No. IE 6416306U

Summary

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

- DHP recognise the inherent need for new homes in County Meath. 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 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.
- The development 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 and of Navan, which is identified as a 'Key town' in the Draft RSES.
- The subject lands are well served by local services which include a number of schools located in close proximity to the west, which will be accessible from the site. Bus stops are located on the Dublin Road, to the east, served by the NX Transport for Ireland route providing links between Navan and Dublin.
- The southern part of our clients' lands is also identified as *"Residential Phase II"* lands. In the Navan Development Plan, objective CS OBJ 3 states in relation to Phase II lands that *"ii) The lands identified with an A2 "New Residential" land use zoning objective but qualified as "Residential Phase II (Post 2019)" are not available for residential development prior to 2019"*. It appropriate now (in 2019) for these lands to be brought forward for development. Our client is currently in pre-application discussions with Meath County Council in relation to the subject lands and intends to lodge a Strategic Housing Development planning application to An Bord Pleanála in Q1 of 2019.
- Our client's lands in Navan will provide for an orderly and sustainable infill of a substantial site adjacent to the town centre of Navan on appropriately zoned lands which benefit from permitted infrastructure and are proximate to social and community infrastructure such as schools employment and retail.

2.0 SITE LOCATION AND CONTEXT

- 2.1 Davy Hickey Properties owns lands totaling c. 17.8 hectares and are located to the west of Academy Street and the R147 Dublin Road, approximately 900 metres south of Navan town centre (Market Square) from the entrance on Academy Street, extending to c. 1.5km to the southern-most portion of the site. The site exists currently as greenfield land and is surrounded by residential properties to the south and west, with a small strip of commercial development occupying lands located between Academy Street and Dublin Road to the east. The River Boyne is located on the eastern side of the R147 (Dublin Road).

Figure 1: Site Location Plan (Google Maps)



(Source: Google Maps).

- 2.2 The subject lands are well served by local services which include a number of schools located in close proximity to the west, which will be accessible from the site. Bus stops are located on the Dublin Road, to the east, served by the NX Transport for Ireland route providing links between Navan and Dublin.
- 2.3 A range of convenience retail, commercial and recreational facilities are located in the immediate vicinity of the site, with Navan Business Park to the east and Navan town centre to the north.

3.0 RELEVANT PROVISIONS OF THE DRAFT RSES AND GROUNDS OF SUBMISSION

Relevant Provisions of the Draft RSES

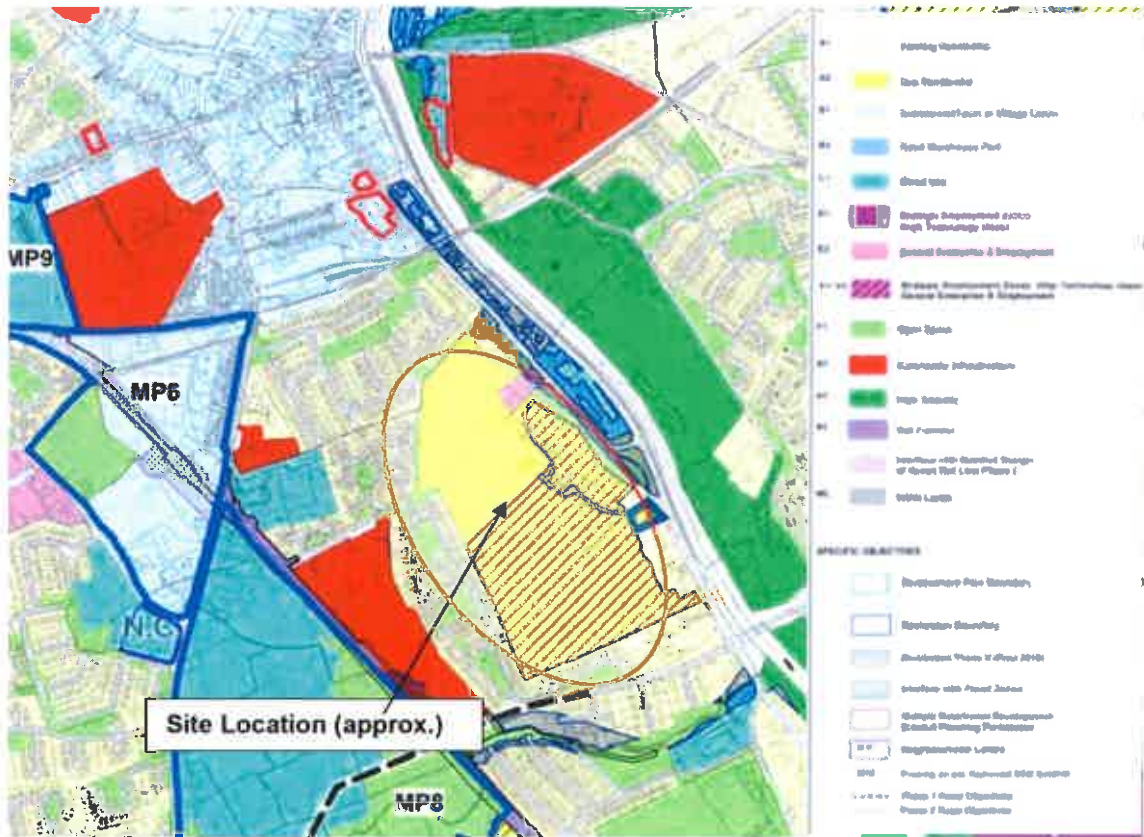
- 3.1 The overarching vision statement of the RSES is *“to create a sustainable and competitive region that supports the health and wellbeing of our people and places, from urban to rural, with access to quality housing, travel and employment opportunities for all”*.
- 3.2 Navan is identified as a ‘key town’ which are noted in table 4.1 of the RSES as *“Large economically active service and/or county towns that provide employment for their surrounding areas and with high-quality transport links and the capacity to act as growth drivers to complement the Regional Growth Centres.”*
- 3.3 It is also noted that the draft RSES supports the reappraisal of the extension of the Dunboyne/M3 Parkway line to Navan during the Mid Term Review of the GDA Transport Strategy.
- 3.4 The following Regional Policy Objective for key towns include:-
- 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.***
- 3.5 According to the draft RSES, Local authorities, in the preparation of their Core Strategies should have due regard to the settlement typology of towns in the Region and carefully consider the phasing of development lands to ensure that towns grow at a sustainable level appropriate to their position in the hierarchy. In this regard, the draft RSES states that *“higher densities in core strategies should be applied to higher order settlements such as Dublin City, Regional Growth Centres and **Key Towns.**”*
- 3.6 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.”*
- 3.7 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.
- 3.8 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

- 2.4 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’.”*
- 2.5 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.
- 2.6 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.
- 2.7 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.
- 3.0 ENSURING CENTRALLY LOCATED LANDS IN NAVAN CAN DELIVER HOUSING**
- 3.1 Our clients’ are zoned ‘A2 New Residential’ in the Navan Development Plan with an objective:
- “To provide for new residential communities with ancillary community facilities, neighbourhood facilities and employment uses as considered appropriate for the status of Navan as a Large Growth Town I.”*
- 3.2 The southern part of our clients’ lands is also identified as *“Residential Phase II”* lands. In the Navan Development Plan, objective CS OBJ 3 states in relation to Phase II lands that *“ii) The lands identified with an A2 “New Residential” land use zoning objective but qualified as “Residential Phase II (Post 2019)” are not available for residential development prior to 2019”*. It appropriate now (in 2019) for these lands to be brought forward for development. Our client is currently in pre-application discussions with Meath County Council in relation to the subject lands and intends

to lodge a Strategic Housing Development planning application to An Bord Pleanála in Q1 of 2019.

Figure 2: Navan Development Plan 2009-2015 Land Use Zoning Map



Source: Navan Development Plan 2009-2015

Phase II Lands

- 3.3 As noted above a portion of the A2 residential zoned lands are identified as “Residential Phase II”. As noted above, it is considered appropriate for these lands to be considered for development in the short term to deliver much needed housing.
- 3.4 It should be noted that the site (identified as site K by MCC) was evaluated as part of Variation No. 1 of the extant Navan Development Plan relative to residential lands and ranked first and highest A2 zoned site (out of an overall 19 no. sites) in relation to the exercise undertaken. In this regard, the site is considered to be an appropriate infill development for the town of Navan and is therefore suitable now for residential development within the emerging Meath County Development Plan 2019-2025. The Evaluation of Residentially Zoned Lands is included at Appendix 7 of the Navan Development Plan.
- 3.5 The CDP notes that the residential land evaluation placed a strong emphasis on the sequential approach to development, and that the evaluation excluded those areas within the identified flood risk mapping and those sites with the benefit of an extant permission. The footprint of the development areas are located outside the flood risk zones and sequentially the subject site is an infill site, with development on all frontages.

- 3.6 Having regard to objective CS OBJ 3, which promotes an order of priority, the release of Phase II residential lands is also considered justifiable given the following:-
- National planning policy including Rebuilding Ireland - Action Plan for Housing and Homelessness and the National Planning Framework,
 - The position of Meath in the Meath settlement hierarchy,
 - The current housing shortage in which residential developments of scale can be considered to be of strategic and national importance,
 - The location of the subject site in close proximity to a number of schools,
 - New development along Academy Street will enhance the overall street and gateway to Navan,
 - The location of the subject lands in relation to the existing services in the town centre located c. 900m and 1,500m to the north.
 - There are numerous bus operators providing a bus service to Navan (NX, 179, 109, 109a, 110, 190) and the lands are proximate to bus services.
- 3.7 The proposed development provides for an orderly and sustainable infill of a substantial site within the town of Navan on appropriately zoned lands which benefit from permitted infrastructure and are proximate to social and community infrastructure such as schools employment and retail.

4.0 CONCLUSIONS

- 4.1 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. This submission has set out the relevant provisions of the Draft RSES document, as it pertains to the town of Navan, Co. Meath, and has set out grounds of submission on the draft document.
- 4.2 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