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To: RSES
Subject: Response to the Draft RSES Eastern and Midland Region
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Dear Sir / Madam

On behalf of our client, Legendstar Ltd, please see enclosed a copy of a submission to the Draft RSES.

I would be grateful if you could confirm receipt.

Regards

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Response to the Draft Regional Spatial & Economic Strategy for Eastern and Midland Region

Enfield, County Meath

January 2019



Prepared on behalf of
Legendstar Limited

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1.0 Introduction

- 1.1 These representations to the Draft Regional Spatial & Economic Strategy (RSES) for the Eastern and Midland Region have been submitted on behalf of our client, Legendstar Limited (herein referred to as "Legendstar") who have various interests throughout County Meath, the majority of which are at Enfield.
- 1.2 Legendstar is an established house builder, who deliver homes if permission is granted and who also take pride in their ability to create superior quality new homes. Through their high standards of design, construction and project management they provide innovative, successful new developments that even surpass existing regulations
- 1.3 Legendstar are a member of the Irish Construction Industry Federation (CIF), Homebond Guarantee Scheme and as a certified skilled building contractor on the Construction Industry Register Ireland (CIRI) the only official register for competent building contractors recognised by the Government and building regulation authorities.
- 1.4 The company is based in Enfield, County Meath and has had developed over 300 houses in Enfield over the past twelve years and have been the only house builder to have been delivering homes since 2013.
- 1.5 Legendstar welcomes the publication to the Draft RSES for consultation, which follows the publication of Project Ireland 2040 – the National Planning Framework (NPF) and National Development Plan (2019-2027).

The Purpose of the RSES

- 1.6 It is understood that the principal statutory purpose of the RSES is to support the implementation of the NPF and the economic policies and objectives of the Government by providing a long-term strategic planning and economic framework for the development of the Regions. It is also noted that the RSES is required under the Planning and Development Act 2000 (as amended) to address employment, retail, housing, transport, water services, energy and communications, waste management, education, health, sports and community facilities, environment and heritage, landscape, sustainable development and climate change.
- 1.7 This regional tier is to be consistent with the NPF, as does that at a local level with the RSES, as set out in Figure 1.2 of the Draft RSES.
- 1.8 Legendstar has several comments to the Draft RSES and this report is structured to follow the order of that document, providing a number of recommendations to amend various parts of the strategy to more broadly align with the NPF, as well as needing to more positively respond and provide a framework for delivering much needed housing in the region.

2.0 Representations to Chapter 1: Introduction

Spatial and Economic Policy Background (1.4) - comment

- 2.1 The NPF is to be implemented through the RSES process, with one of the key themes in the NPF is the promotion of "effective regional development". Under this scenario there is a shift from the "business as usual" approach towards more compact growth to be concentrated (in the Eastern & Midlands region) in Dublin, and regional growth centres including Athlone, Drogheda, Sundalk, Sligo and Limerick. This policy approach has implications for population growth in the Eastern and Midland Region
- 2.2 The inclusion of the transitional period to operate to 2027 to address matters such as "pent up demand" for housing following the economic crisis, whilst in parallel planning for longer term growth and other supporting investment, is supported.

A growing region – comment and recommended changes

- 2.3 It is noted that from 2006 to 2016, the Region by 15% (an increase of over 3000,000 people), which exceeded the state average growth rate of 12% over the same period. The Draft RSES also notes that the region contains some of the fastest growing communities in the country which increases demand for housing, infrastructure and services in those areas.
- 2.4 Appendix B (Strategic Planning Area (SPA) and County Population Tables) of the Draft RSES notes that the population of County Meath is projected to increase from 195,000 in 2016 to a "high" of 231,500 by 2031. This represents an increase of up to 36,500 people. It is also noted that the NPF Roadmap allows for the potential for up to 25% to the headroom to be added to the 2026 population projection, which is supported by Legendstar.
- 2.5 However, the population growth figures has not translated the population growth into household growth.

Recommended changes

- 2.6 Therefore, greater clarity is required to allow how a settlement will develop spatially, to ensure that it is providing a sufficient (and flexible) supply of zoned lands for development, including housing. This is particularly important as it is recognised that the Core Strategy requirements set out in section 10 of the Planning and Development Act 2000 (as amended) require details of the proposed number of residential units being planned for to be provided.
- 2.7 It is therefore requested that greater clarity is provided in the RSES to allow Local Authorities to include the necessary evidence base in their emerging Core Strategies / Development Plans.

Quality of Life

Housing – objection

- 2.8 The Draft RSES also notes that one of the challenges facing the region is the continued growth rates of household formation coupled with a severe slowdown in the development of new housing stock during the economic recession, resulting in housing supply and affordability pressures in both sale and rental markets, particularly in Dublin and urban areas but affecting all of the region.

- 2.9 Legendstar notes that the 2016 Census revealed that between 2011 – 2016, nationally there was a net addition of c.8,803 properties to the residential stock, which equates to an increase of 0.4% during this five-year period. During the same period, the population of Ireland increased by 173,613 people from 4,588,252 to 4,761,865 people.
- 2.10 Therefore, whilst the overall population rose by 3.8 %, the actual number of additional homes increased by just 0.4%. This shows that nationally the number of homes delivered did not meet the needs and demands of the increasing population during this period.
- 2.11 The 2016 Census shows that the population of County Meath increased from 184,135 in 2011 to 195,044, in 2016, which represents an increase of 10,909 people (5.7%). The 2016 Census also shows homes completed that between 2011 and 2016 (i.e. 5 years), there was a net addition of 892 dwellings over the 5-year period.
- 2.12 Therefore, based on this evidence, since the MCDP came into effect on the 22nd January 2013, it is estimated that c. 534 dwellings (178 x 3 years) have been completed against a requirement of 7,800 dwellings (2,600 x 3 years).
- 2.13 This represents a completion rate of 6.8% or shortfall of 7,266 against the housing requirement during this period. This means that the required amount of homes that had been planned for, as set out in MCDP have not been delivered at the necessary rate to meet the overarching objectives of the MCDP
- 2.14 Whilst the recession would have contributed to the shortfall in delivery, within County Meath it should be noted that the Council's residential phasing policy introduced through variation no. 2 of the Meath County Development Plan has also have contributed to this shortfall.
- 2.15 Strategic Policy 3 states that:
- "To operate an Order of Priority for the release of residential lands in compliance with the requirements of CS OBJ 6 of the County Development Plan as follows:*
- i. The lands identified with an A2 "New Residential" land use zoning objective corresponds with the requirements of Table 2.4 Housing Allocation & Zoned Land Requirements in Volume I of this County Development Plan and are available for residential development within the life of this Development Plan*
 - 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 within the life of this Development Plan*
- 2.16 Therefore, those lands identified in part (ii) above have been restricted by the Council from being brought forward by the Council, during a time of significant housing shortfall in County Meath, and where there is a continued reliance on undeliverable Phase 1 zoned residential lands.

Recommended changes

- 2.17 It should therefore be noted, that, whilst the recession has impacted on developers and housebuilders to deliver homes, other matters such as restrictive planning policy has also contributed to the issue. It is therefore recommended that the third paragraph of the housing paragraph on page 15 is amended to read:

"...One of the challenges facing the region is a severe slowdown in the development of new housing stock during the economic recession and restrictive planning policies which has contributed to the lack of housing supply. This has had consequential impacts on household formation, and affordability pressures in both sale and rental markets, particularly in Dublin and urban areas but affecting all of the region."

- 2.18 Therefore, to enable Local Authorities to meet the objective of delivering the necessary number of homes for the 490,000-540,000 additional people projected for the Eastern and Midland Region by 2040, as defined in National Policy Objective 1b, the matter of phasing and prioritisation of the zoning of land is recognised not only at the regional level but is also carefully considered by Local Authorities when they are reviewing their respective County Development Plan.

3.0 Representations to Chapter 3: Growth Strategy

Development of an Asset-Based Approach / Table 3.1 - Objection

- 3.1 Legendstar is supportive of the evidence-based approach to inform the emerging regional strategy. It is noted that Table 3.1 was developed to identify an emerging spatial hierarchy of settlements in the Region.

Scale

- 3.2 Legendstar notes that in terms of "scale" (centres of scale which have the critical mass to drive growth), the second column of Table 3.1 titled "as expressed in Settlement strategy" states:

"Settlement typology based on rate of growth, scale, development capacity and availability of strategic sites"

- 3.3 Legendstar also notes that in the context of defining a settlement strategy, the availability of sites should not be restricted to those defined as "strategic". It is not clear what is meant by the term "strategic sites", as there is no definition contained in Appendix G (Glossary) of the Draft RSES.

- 3.4 In addition, whilst land may be "available", there may be issues regarding the respective deliverability, and therefore reliability on only this source of land when informing a settlement typology becomes flawed and is contrary to approach as set out in Appendix 3 (A Methodology for a Tiered Approach to Land Zoning) of the NPF.

- 3.5 By way of reference it includes a two-tier approach to land zoning as following:

- Tier 1: Serviced Zoned Land: Comprising land able to connect to existing development services, which are within the existing built up footprint of a settlement or contiguous to existing developed lands; and
- Tier 2: Serviceable Zoned Land: Lands that are not currently sufficiently serviced to support new development but have potential to become fully serviced within the life of the plan.

- 3.6 The reference and potential reliance on "available strategic sites" is likely to have potential consequences at the County Development Plan, when considering the selection and zoning of potential development lands. Based on our experience there is significant lead in times required to bring forward potential strategic sites.

- 3.7 Therefore, whilst they do represent a potential source, other (non strategic) lands should also be identified which have the ability to deliver much needed development in the short term, which would cumulatively provide the necessary development to meet the overarching objectives of the RSES and NPF.

Recommended changes to Table 3.1

- 3.8 It is therefore recommended that to be consistent with the NPF, the wording within the second column of Table 3.1 should be amended to:

"Settlement typology based on rate of growth, scale, development capacity and availability deliverability of suitable ~~strategic~~-sites"

4.0 Representations to Chapter 3: Growth Strategy and Chapter 4: People & Place

Development of alternative scenarios, selection of preferred scenario and settlement strategy (4.2) and defining a settlement typology (4.3) - Objection

- 4.1 The issues of alternative scenarios, preferred scenario and settlement typology are intrinsically linked, and therefore this response addresses both together in this section, whilst they are separated in the Draft RSES.
- 4.2 It is noted that in terms of the potential spatial scenarios identified, table 3.2 includes:
- a) Concentrated growth in Dublin and Regional Growth Centres of Athlone, Dundalk and Drogheda;
 - b) Continued dispersal of growth in all large settlements across the Region; and
 - c) Continued growth of Dublin and regional centres by a limited number of large towns based on their strengths and assets.
- 4.3 Page 34 of the Draft RSES states that the preferred spatial strategy for the Eastern and Midland draft RSES is Option C, which includes reference to planned focussed growth of a limited number of self-sustaining settlements that have the assets and capacity to grow in a sustainable manner, while minimising impacts on the receiving environment. There is reference to the "key towns" of Bray, Maynooth, Swords, Navan, Naas, Wicklow-Rathnew, Graiguecullen (Carlow), Longford, Mullingar, Tullamore and Portlaoise.
- 4.4 It is this point where this a need to consider the baseline settlement typology, as set out in the Draft RSES. The settlement strategy is defined in section 4.2 of the Draft RSES, which includes the following settlement typology:
- Dublin City and suburbs
 - Regional Growth Centres
 - Key towns
 - Medium to Large towns
 - Small towns and villages
 - Rural
- 4.5 The Draft RSES provides a "cut off", of identifying key towns and regional growth centres, with a population of at least 10,000 people and leaves the Development Plans to identify Medium to Large towns, which have the capacity for continued commensurate growth to become more self-sustaining.
- 4.6 The following table is an extract from the current RPG for the Greater Dublin Area (2010-2022), which sets out the settlement typology and hierarchy of that document.

Table 8: Settlement Typology and Hierarchy

Hierarchy	Description	Locations
Gateway Core	International business core and high density population, retail & cultural activities.	Dublin City Centre & immediate suburbs
Metropolitan Consolidation Towns	Strong active urban places within metropolitan area with strong transport links	Swords, Blanchardstown, Lucan ⁷⁶ , Clondalkin ⁷⁸ , Tallaght, Dundrum, Dun Laoghaire, Bray ⁷⁷
Large Growth Towns I	Key destinations, economically active towns supporting surrounding areas, located on Multi Modal Corridor in metropolitan hinterland	Navan, Naas, Wicklow Droichead ⁷⁹
Large Growth Towns II	Smaller in scale but strong active growth towns, economically vibrant with high quality transport links to larger towns/city	Newbridge, Greystones, Cherrywood, Arklow, Balbriggan, Dunboyne, Maynooth, Lisdrip ⁷⁸
Moderate Sustainable Growth Towns	(i) In Metropolitan area, strong edge of metropolitan area district service centres, high quality linkages and increased densities at nodes on public transport corridors (ii) In Hinterland areas, 10k from large town on public transport corridor, serve rural hinterland as market town	Donsdale, Celbridge, Lusk, Rush, Ashbourne, Kells, Trim, Dunsheughlin ⁸⁰ , Kildare, Monasterevin, Kilsallen, Kilcock, Athy, Newtownmountkennedy, Blessington.
Small Towns	Good bus or rail links, 10k from large growth towns	To be defined by Development Plans.
Villages		To be defined by Development Plans.

Figure 4.1 – Table 8 extracted from RPG for the Greater Dublin Area (2010-2022),

- 4.7 The National Planning Framework 2040 acknowledges that up to 550,00 more homes will be needed in the Eastern and Midland Region by 2040. It is further noted that there is headroom to use "...cities, towns and villages of all types and scale as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area."
- 4.8 Through the revised County Development Plans, it is a mandatory requirement to provide adequate zoned land to address matters of housing demand and to support a balanced house building market. This also includes ensuring that locations for growth and consolidation are properly referred to.
- 4.9 The amended regional strategy to not specifically identify Large Growth Towns I, Large Growth Towns II and Moderate Sustainable Growth Towns is a significant amendment in the regional context. However, there is no specific explanation and justification of why this Draft RSES has adopted this approach, and why it has only identified settlements with a population of at least a population of 10,000.
- 4.10 Of particular note is the absence in the Draft RSES of settlements defined as "Moderate Sustainable Growth Towns", where in the case of settlements in the Hinterland area, such settlements should be:
- 10km from large towns on public transport corridor; and
 - Serve the rural hinterland as a market town.
- 4.11 The RPG for the Greater Dublin Area (2010-2022), defines Moderate Sustainable Growth Towns (in the Hinterland Area) as follows:

These towns are sub-county town level, with lesser levels of economic activity beyond that required to service the local population. Commuting from here to Large Growth towns and the Gateway is

currently a significant element for both hinterland and metropolitan towns in this category, with connections by bus to a number of destinations and the City (where available by rail) meeting such needs. Most of these towns are envisaged as having an interacting and supporting role to their adjacent higher order town in hinterland areas or as part of the City within the metropolitan area. A minority of these towns are smaller in size, but have a higher level servicing function to smaller towns, villages and undeveloped rural/amenity lands in their catchments, due to their remoteness from larger towns.

It is critical that in the future Moderate Growth Towns in the hinterland area develop in a self-sufficient manner in the longer term and that continued basis for growth is that they do not become dormitory towns. These towns should provide a full range of local services adequate to meet local needs at district level and for the surrounding rural areas, but not attract long distance travel patterns. Strong social infrastructure should be a feature of such towns, with growth in population happening in tandem with ability of the community to support such growth, particularly in relation to schools and leisure facilities. Economic opportunities through good road connections, good social infrastructure and strong local labour market should be capitalised on to attract a range of enterprises. Key sites and facilities should be identified that are fully serviceable and available for encouragement of economic investment opportunities. Servicing and phasing of housing lands in these towns should aim to ensure that housing growth levels are sustainable, in that they are clearly linked to levels of natural increase or economic expansion within the town, and do not create significant increases in long distance commuting patterns, particularly for those served only by bus.

Recommended Changes to Settlement Strategy

- 4.12 Legendstar believes that to positively respond to the National Planning Framework to deliver the 550,000 more homes needed in the Eastern and Midland Region by 2040, and in the case of County Meath, a sufficient number of homes to meet the potential additional 36,500 people by 2031, as defined in Appendix B (Strategic Planning Area (SPA) and County Population Tables), the Draft RSES should include an additional settlement tier.
- 4.13 Legendstar believes that this form and type of settlement typology that has already been positively planned for in County Meath, would provide greater certainty and direction of where (outside Dublin City, Regional Growth Centres and Key Towns), development is needed and should be directed. This would also provide the necessary certainty at the regional level, with more local matters to be considered and defined at the Development Plan stage.
- 4.14 Legendstar considers that in the current housing crisis, there is a need for greater certainty, to allow strategies to positively respond (and earlier), rather than delay on these points, which in turn delays housing delivery and investments even further.
- 4.15 Therefore, Legendstar believes that the "Moderate Sustainable Growth Town" typology should be inserted in Table 4.1 (Settlement Hierarchy) of the Draft RSES immediately below "Key Towns", with Table 4.3 (Settlement Typologies and Policy Responses) amended as follows:

Settlement Typology	Description	Areas		
		Metropolitan	Hinterland	Outer Region
Moderate Sustainable Growth Towns	<p>Towns which are located on public transport corridors (both rail and bus), that include a full range of local services adequate to meet local needs at district level and for the surrounding rural areas.</p> <p>Strong social infrastructure with ability of the community to support such growth, particularly in relation to schools, housing, leisure and employment facilities to become or</p>			

Settlement Typology	Description	Areas		
		Metropolitan	Hinterland	Outer Region
	continue to be self-sustaining, and supporting a wider rural hinterland.			

Table 4.1 – Recommended changes to Table 4.1 (Settlement Hierarchy) of the Draft RSES

Settlement Typology	4. Moderate Sustainable Growth Towns
Significance	Regional / County
Socio economic functions	Towns that provide have the capacity to continue to grow in a sustainable way, to address past under supply of housing (if applicable), and future market and demographic needs that link levels of economic and education expansion within the town.
Transport profile	Self-sufficient settlements, with good public transport (rail and bus) and regional transport links.
Policy response	Commensurate population, employment and education growth on ideally on public transport corridors, with sufficient infrastructure capacity to cater for necessary growth to main its self-sufficiency, but also to serve the wider rural hinterland for where it is located.

Table 4.2– Recommended changes to Table 4.3 (Settlement Typologies and Policy Responses) of the Draft RSES

- 4.16 In addition to the above, and for comprehensiveness, it will be necessary to include a new section “4.7” titled, “Moderate Sustainable Growth Towns”. The recommended proposed wording is as follows:

“4.7 – Moderate Sustainable Growth Towns

These are towns that in the context of the Region are (or have the ability) to grow to Moderate Sustainable Growth Towns in scale, varying in function between self-sustaining settlements and those that provide a wider function to the rural hinterland.

These are towns at the regional level, which have economic activity servicing itself as a self-sufficient settlement, and the potential and capacity to serve the wider rural hinterland.

Most of these towns are envisaged as having an interacting and supporting role to their adjacent higher order town in hinterland areas or as part of the City within the metropolitan area. A minority of these towns are smaller in size, but have a higher level servicing function to smaller towns, villages and undeveloped rural/amenity lands in their catchments, due to their remoteness from larger towns.

It is critical that in the future Moderate Growth Towns in the hinterland area develop in a self-sufficient manner in the longer term and that continued basis for growth is that they do not become dormitory towns.

These towns should provide a full range of local services adequate to meet local needs at district level and for the surrounding rural areas, but not attract long distance travel patterns.

Strong social infrastructure should be a feature of such towns, with growth in population happening in tandem with ability of the community to support such growth, particularly in relation to schools and leisure facilities.

Economic opportunities through good road connections, including proximity to the motorway network, good social infrastructure and strong local labour market should be capitalised on to attract a range of enterprises. Key sites and facilities should be identified that are fully serviceable and available for encouragement of economic investment opportunities at the Development Plan stage.

Servicing and phasing of housing lands in these towns should aim to ensure that housing growth levels are sustainable but include sufficient land to address past under supply of housing (if applicable), and future market and demographic needs that link levels of economic and education expansion within the town, and do not create significant increases in long distance commuting patterns, particularly for those served only by bus.

REGIONAL POLICY OBJECTIVES:

Moderate Sustainable Growth Towns

RPO4.50: Support the sustained growth of those settlements identified as Moderate Sustainable Growth Towns to become self-sustaining settlements and providing a wider function to the rural hinterland where it is located. Future development required to achieve the growth vision for such towns including:

- *Support the regeneration of underused, vacant or derelict lands within the settlements for residential / mixed use development to facilitate population growth; and*
- *Provide for sufficient zoned lands for residential, education, economic and leisure development through the selection of sites for zoning as set out in Appendix 3 of the National Planning Framework to ensure that growth is directed towards settlements that have the capacity to grow sustainably."*

The case of Enfield, County Meath as a Moderate Sustainable Growth Town

- 4.17 Enfield, County Meath located on the southern boundary of the along the M4 "Knowledge Corridor" and on the Dublin / Sligo railway line, with good bus services and its proximity to Maynooth University, which acts as a key centre serving the wider rural hinterland for where it is located.
- 4.18 In a more local context, the current Meath County Development Plan 2013 – 2019 (MCDP) was adopted on the 17th December 2012 and came into effect on the 22nd January 2013. Since the adoption of the County Development Plan, four variations have been proposed and adopted. Of relevance to the matter of settlement hierarchy for the Draft RSES, is variation no. 3 to the MCDP.
- 4.19 In March 2016, Variation No.3 included the following amendments in respect of Enfield:

3.4.5 Small Towns - Athboy, Bettystown/Laytown/Mornington East, Duleek, Enfield, Oldcastle, Ratoath, Stamullen

The Small Towns in Meath have varying characteristics and differences can be seen in the factors that have influenced their growth. This is recognised in the RPGs. The types of Small Town present in Meath include local commuter type towns situated close to larger centres and small commercial towns, remote from the Dublin commuter areas that have strong trading tradition serving a large rural hinterland. Oldcastle and Athboy would be representative of this type of settlement. They have developed on a more local, independent and economically active basis under the influence of large towns in Meath. Meath County Council will continue to encourage them to develop in this manner. Oldcastle in particular has a strong indigenous industrial base. While the town is peripheral in Meath, it is strongly influential in its wider area of influence which extends into Cavan and Westmeath.

Within Meath, other Small Towns such as Ratoath, ~~Stamullen~~ and Bettystown/Laytown/Mornington East have developed mainly on the basis of dormitory towns and are facilitating commuting primarily to Dublin. ~~The East Meath town of Stamullen has seen its location close to the M1 and within easy reach of Dublin as a major force for development in recent years.~~

Enfield has the potential to grow to a Moderate Sustainable Growth town over the lifetime of the County Development Plan having regard to its strategic location along the M4 "Knowledge Corridor" and on the Dublin/ Sligo rail line and its proximity to Maynooth University. An opportunity to provide capacity for high end land hungry employment and secondary education facilities exists at the eastern end of the town.

Stamullen has seen its location close to the M1 International Economic Corridor and within easy reach of Dublin as a major force for development in recent years. Stamullen is envisaged to ultimately grow to a moderate sustainable growth town status along the M1 Economic Corridor. ~~in an appropriate way with employment development being incremental & commensurate with residential & population growth.~~ Any change in the status of the town is likely to occur as an incremental process, in particular any significant population growth would occur over the equivalent of several County Development Plans. If approved by the Regional Assembly it is likely that Stamullen would gradually evolve towards Moderate Growth Town status with residential development occurring in tandem with commensurate supporting, sustainable employment, community and educational facilities. Ongoing substantial engagement with the community in Stamullen and other centres will be essential to ensure local support. Furthermore it is imperative for the sustainable future growth of Stamullen that a direct road link be provided with Junction 7 of the M1 Motorway.

The status of both settlements shall be pursued with the Regional Assembly in the coming years.

- 4.20 The Land Use Zoning Plan in Figure 4.1 below shows the lands to the north east of Enfield proposed to be zoned for high end technology / manufacturing and major campus style office-based employment within high quality and accessible location.

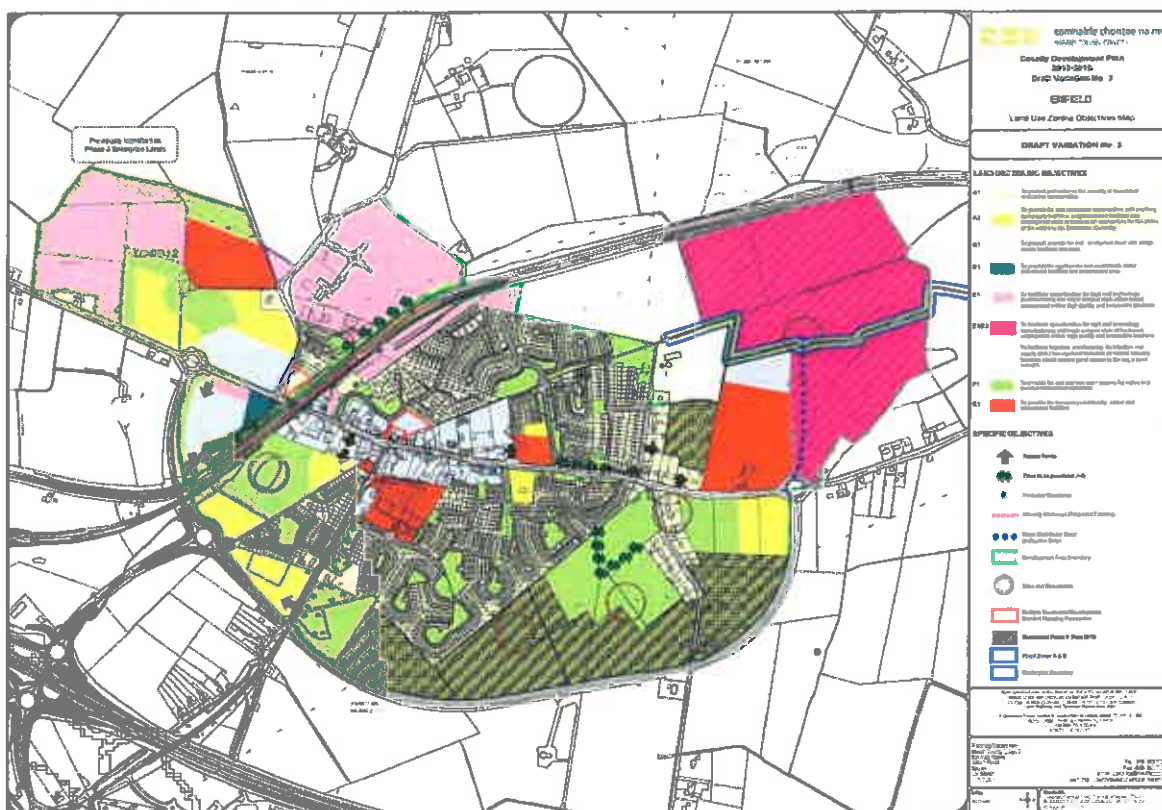


Figure 4.1: Enfield Land Use Zoning Plan (Draft Variation No.3):

- 4.21 In June 2016, following the approval by the elected members for the proposed changes, Section 3.4.5 of the MCDP was amended, whilst the land zoning plan was approved to be amended. The amended text for section 3.4.5 is set out below, whilst Figure 4.2 of this report shows the land use zoning plan for Enfield as published in the MCDP December 2016 consolidated version.

3.4.5 Small Towns - Athboy, Bettystown/Laytown/Mornington East, Duleek, Enfield, Oldcastle, Ratoath, Stamullen

The Small Towns in Meath have varying characteristics and differences can be seen in the factors that have influenced their growth. This is recognised in the RPGs. The types of Small Town present in Meath include local commuter type towns situated close to larger centres and small commercial towns, remote from the Dublin commuter areas that have strong trading tradition serving a large rural hinterland. Oldcastle and Athboy would be representative of this type of settlement. They have developed on a more local, independent and economically active basis under the influence of large towns in Meath. Meath County Council will continue to encourage them to develop in this manner. Oldcastle in particular has a strong indigenous industrial base. While the town is peripheral in Meath, it is strongly influential in its wider area of influence which extends into Cavan and Westmeath.

Within Meath, other Small Towns such as Ratoath and Bettystown/Laytown/ Mornington East have developed mainly on the basis of dormitory towns and are facilitating commuting primarily to Dublin.

Enfield has the potential to grow to a Moderate Sustainable Growth town over the lifetime of the County Development Plan having regard to its strategic location along the M4 'Knowledge Corridor' and on the Dublin/Sligo rail line and its proximity to Maynooth University. An opportunity to provide capacity for high end land hungry employment and secondary education facilities exists at the eastern end of the town.

Stamullen has seen its location close to the M1 International Economic Corridor and within easy reach of Dublin as a major force for development in recent years. Stamullen is envisaged to ultimately grow to a moderate sustainable growth town status along the M1 Economic Corridor. Any change in the status of the town is likely to occur as an incremental process, in particular any significant population growth would occur over the equivalent of several County Development Plans. If approved by the Regional Assembly it is likely that Stamullen would gradually evolve towards Moderate Growth Town status with residential development occurring in tandem with commensurate supporting, sustainable employment, community and educational facilities. Ongoing substantial engagement with the community in Stamullen and other centres will be essential to ensure local support Furthermore it is imperative for the sustainable future growth of Stamullen that a direct road link be provided with Junction 7 of the M1 Motorway.

The status of both settlements shall be pursued with the Regional Assembly in the coming years.

The pattern of commuter lead development in these towns must be limited in the future, with Small Towns catering for a greater proportion of local growth. This takes cognisance of the fact that none of the Small Towns are designated in the RPGs as being strategic centres and it will allow for a period of consolidation of local facilities and infrastructure to serve the local population, facilitating more sustainable communities as envisaged in the core strategy of this Development Plan. The distribution of household growth at the level of Small Town must therefore be appropriate to this level of the hierarchy and ensure that further commuter development will not be encouraged.

Duleek has experienced growth related to commuter development in the past but has also seen an expansion of industrial use in the business park in the town. This expansion should be encouraged to provide a greater proportion of employment locally, consistent with the role of the Small Town.

Enfield has an advantageous location along the M4 and benefits from multi modal transport linkages with the town being served by a rail line. In this respect, car parking facilities at the railway station have been extended in recent years. Opportunities to maximise the use of public transport infrastructure in the town should be taken and a greater integration of land use and transport should be promoted. However this must be managed to ensure that the town develops in a balanced manner, providing employment locally rather than creating a dependence on outward commuting for employment, even by public transport.

Ratoath has experienced substantial growth in recent years which has placed significant pressure for infrastructure and service provision. Growth in local employment and services has not matched the growth in population. In the short term, the priority is to encourage a more balanced town to develop with the expansion of social infrastructure and promotion of local employment opportunities. Ratoath has been included in the RPG's as an employment base because of its educated workforce.

The broad approach of the Development Plan for Small Towns is to manage growth in line with the ability of local services to cater for growth and respond to local demand. Relatively small and locally financed businesses are expected to locate in Small Towns. However, other economic investment opportunities should be considered and supported where sustainable and in keeping with the size and services of the town. Retail is likely to be mainly in the convenience category, with a small supermarket and possible local centres serving only the town and its local catchment area.

In line with the guidance contained in the 'Sustainable Residential Development Guidelines for Planning Authorities (Department of the Environment, Heritage and Local Government, 2009), within all Small Towns no one proposal for residential development should increase the existing housing stock (including permitted units) generally by more than 15% within the lifetime of the Development Plan.

The Meath County Development Plan 2007–2013 contained an objective requiring that 25% of all new multi-house development in Small Towns should be reserved for persons who are native to the County. This objective is not included in this Plan. Instead, the approach to ensuring that population growth in Small Towns caters for locally derived growth is through the means of apportioning an appropriate household allocation to each town, as set out in the core strategy.

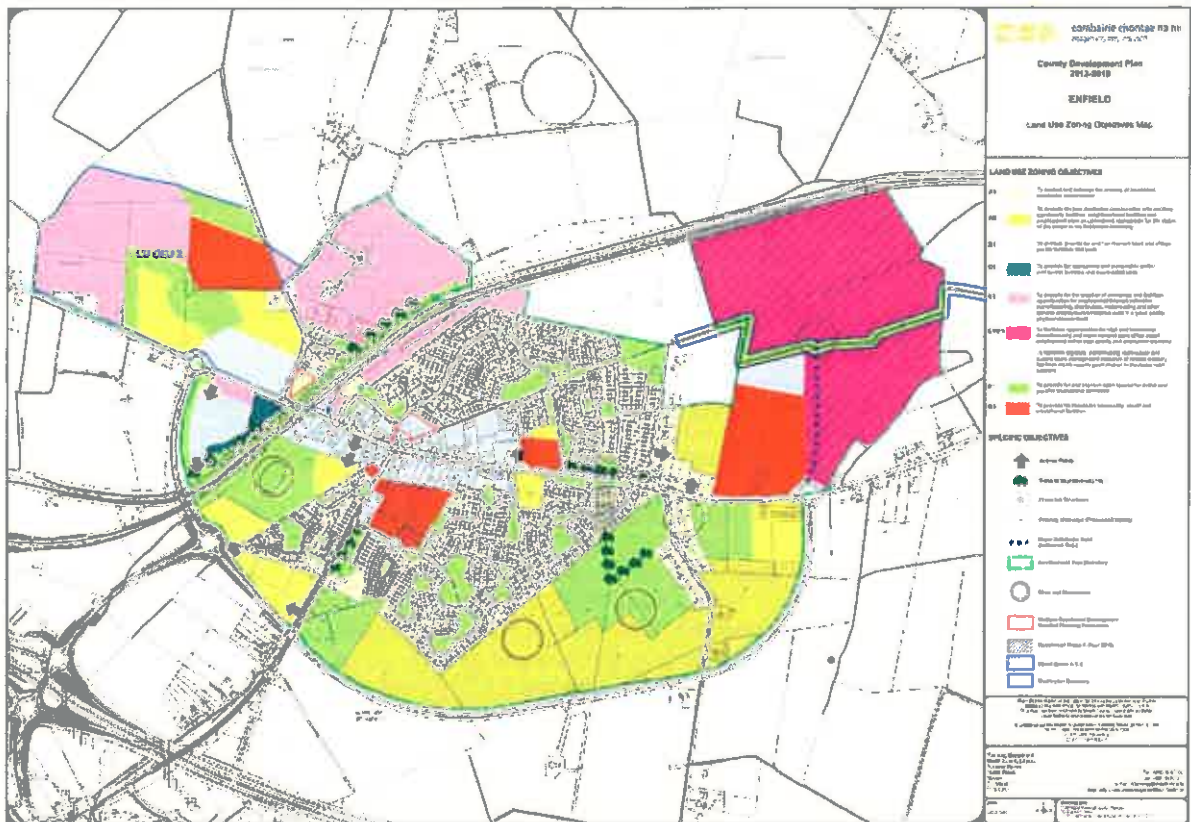


Figure 4.2: Zoning Plan for Enfield at June 2016 (published in the December 2016 consolidated version)

4.22 In addition to the above matters, it should be noted that some key attributes of Enfield include:

- **Town Centre:** Enfield includes a range of facilities including several supermarkets (Tesco Express and Supervalu), two petrol stations, hairdressers, pubs, cafes, takeaways and other local businesses.
- **Public Transport:** Enfield is served by a range of bus and rail services, linking it to Dublin.

Bus Company	Service	Route	Frequency		
			Monday to Friday	Saturday	Sunday
Bus Eirann	20	Galway to Dublin return	6-8 per day	6 – 8 per day	6 – 8 per day
	115	Dublin to Mullingar return	9-12 per day	6 per day	6 per day
	115A	Dublin to Mullingar return	5 per day	5 per day	N/A
Citylink	763	Galway to Dublin return	6-7 per day	6-7 per day	6-7 per day
Kearns	820	Edenberry to Enfield / Dublin return	One am, Two pm	N/A	N/A
	845	Portumna to Dublin return	7 in the am, 7 in the pm	N/A	N/A
	847	Portumna to Dublin return	2 per day	2 per day	3 per day

Table 4.3 – Enfield Bus Service Summary

Train Route	Frequency		
	Monday to Friday	Saturday	Sunday
Enfield to Dublin return	18 depart, 9 return	6 depart, 6 return	6 depart 7 return

Table 4.4– Enfield Train Service Summary

- **Education:** There is 1 no. primary school (St Mary's National School). There are a further three no. primary schools within 5km of the subject site. The nearest secondary school is in Longwood (Colaise Clavin), approximately 8km west from Enfield. On the 13th April 2018, Minister Bruton announced plans to establish 42 new schools over the next 4 years (2019 to 2022), with 26 schools at primary level and 16 at post primary level. One of these 16 post primary schools have been identified at Enfield (Kilcock School Planning Area), for 500 pupils and is due to open in 2020.



Figure 4.3 – Enfield Infrastructure

- 4.23 Therefore, taking into consideration the evidence presented in these representations, it is recommended that "Enfield", County Meath, is specifically identified as a Moderate Sustainable Growth Town in the emerging RSES. Please refer to Table 4.5 as follows for the recommended changes to Table 4.1 (Settlement Hierarchy) with the inclusion of Enfield:

Settlement Typology	Description	Areas		
		Metropolitan	Hinterland	Outer Region
Moderate Sustainable Growth Towns	<p>Towns which are located on public transport corridors (both rail and bus), that include a full range of local services adequate to meet local needs at district level and for the surrounding rural areas.</p> <p>Strong social infrastructure with ability of the community to support such growth, particularly in relation to schools, housing, leisure and employment facilities to become or continue to be self-sustaining, and supporting a wider rural hinterland.</p>		<ul style="list-style-type: none"> • Enfield 	

Table 4.5 – Recommended inclusion of Enfield as a Moderate Sustainable Growth Town

- 4.24 If the case of the inclusion of the "Moderate Sustainable Growth Town" is not accepted by the Regional Assembly, Legendstar would still suggest that the RSES needs to reflect the potential of Enfield, as identified in Variation No.3 of the MCDP to enable maximum advantage being taken from its existing rail and bus connections to Dublin City, and proximity to other employment centres, such as Maynooth and Kilcock.

Headroom - Support (with recommended changes)

- 4.25 The third paragraph under the sub heading of "Headroom" refers to the NPF Roadmap population projections, which have already incorporated 25% headroom figures for all part of the country (Appendix 2). This may be supplemented by additional 25% headroom, applicable in the 16 no. local authority areas (which includes County Meath) that are projected to grow at or above the national average growth figure (page 5 of the NPF Roadmap). By way of reference page 5 states:

Providing further headroom in counties where provision for population growth has been significantly adjusted up to the national average, would therefore be inappropriate, to ensure that land zoning is broadly matched to an evidentially grounded assessment of need and co-ordination in infrastructure investment. Scope for headroom, not exceeding 25%, can be considered to 2026 in those counties where projected population growth is projected to be at or above the national average baseline (i.e. Cork (City and County), Dublin (all four local authorities), Galway (City and County), Kildare, Limerick, Louth, Meath, Sligo, Waterford, Westmeath, and Wicklow.

The introduction of significant infill/brownfield targets for residential development within existing settlement 'footprints' in the NPF also must be factored in, which reflects a greater desire by Government as well as many key stakeholders, to move away from an excessive reliance on greenfield development to meet our development needs and encourage more city, town and village centre renewal. This means that the extent of zonings on peripheral greenfield development sites will need to be critically evaluated with regard to their compatibility with the renewal and regeneration targets set out in the NPF. (our emphasis)

- 4.26 Legendstar supports Meath being identified above, and whilst they have no objection to encourage more city, town and village centre renewal, given the extent and scale of homes required in Meath, there will still be a need for greenfield development sites, especially those which are serviced by the necessary infrastructure.
- 4.27 As part of the evidence-based approach there will need to be a need to critically evaluate all lands being proposed for development and identify those which have the capability of being delivered, rather than as page 42 of the RSES states that "*housing delivery in the immediate term and above all, avoiding the hoarding of land and / or planning permissions.*"
- 4.28 In addition page 42 of the RSES also states that "*sites with long-term development potential at priority locations should not be "reserved" at the land allocation stages of the plan-making and implementation processes, in such a way as would create an unreasonable dependency on such sites being brought forward or that would impede the brining forward of other suitable lands with better prospects for delivery in the short term, if the strategic sites are not being brought forward by their owners.*"
- 4.29 *Proactive land management therefore requires realistic prioritisation, proper monitoring and effective co-ordination across regional, metropolitan, city and county levels."*

Recommended changes

- 4.30 Whilst Legendstar is supportive of the recognition of Meath, however in the interests of clarity, it is suggested that an additional column could be included in the "County Population Tables" listing those authorities that can avail to the supplementary 25% headroom.

Policy RP04.2 - Objection

- 4.31 Legendstar supports the reference in Policy RPO4.2 that all residential developments should be planned on a phased basis in collaboration with infrastructure providers. However, the policy appears

to suggest that the capacity for services is available at the time of the consideration of a development proposal, and, for example does not allow for the potential for upgrades to infrastructure to facilitate development. Legendstar believes there is a need for the policy to reflect this matter, as it will become a pertinent matter at the formulation of policy at the County Development Plan stage.

Recommended changes

- 4.32 It is therefore recommended that the second paragraph of RPO 4.2 is amended (see inserted underlined text) as follows:

"..... All residential and employment developments should be planned on a phased basis in collaboration with infrastructure providers so as to ensure adequate capacity for services (e.g. water supply, wastewater, transport, broadband) is or can be made available through appropriate measures to match projected demand for services and that the assimilative capacity of the receiving environment is not exceeded"

Regional Policy Objectives (Page 63) - Objection

- 4.33 Whilst Legendstar has no specific objection to the policies as proposed in the Draft RSES., the sub-heading of "Rural Areas" is confusion as this appears to apply just to Section 4.8 (titled Rural Areas).
- 4.34 However, when reading the wording of the various policies, there is reference to "small towns" in RPO4.51, which are defined under section 4.7 (Other towns).

Recommended changes to Regional Policy Objectives (Page 63)

- 4.35 It is therefore recommended that to avoid ambiguity, and, for consistency, that the subheading of "Rural Areas" contained on page 63, is amended to (note inserted wording underlined):

"Other Towns and Rural Areas"

5.0 Representations to Chapter 6: Economy & Employment

The Region's Economic Engines and their sectoral opportunities (6.4) - Objection

- 5.1 Page 95 of the Draft RSES refers to each of the proposed settlement typologies. As Legendstar is recommending that the additional tier of "Moderate Sustainable Growth Town" is included in chapters 3 and 4 of the Draft RSES, for the sake of comprehensiveness, there is a need to define it at page 95, section 6.4 of the Draft RSES.

Recommended changes

- 5.2 It is therefore recommended to amend the paragraph at page 95, with the current sub heading of "Key towns and Medium to Large towns", to:

"Key Towns, Moderate Sustainable Growth Towns and Medium to Large Towns

The RSES growth strategy set out in Chapter 3 and settlement hierarchy in Chapter 4 identifies the ~~settlements and medium large towns~~ Key Towns, Moderate Sustainable Growth Towns and Medium to Large Towns. Key towns, strong market / sub county towns are locations that have an economic function that provides employment for their surrounding areas and have a wide catchment. In many cases these areas have varying economies and sectors, the Strategy will support their sustainable growth. Moderate Sustainable Growth Towns are towns that are and have the capacity to grow to continue to act as a self-sufficient settlement, whilst performing a wider function for the surrounding rural hinterland for where they are located.

Specific sectors: Retail, Tourism, Marine, Agriculture - Objection

- 5.3 By way of reference Figure 6.1 is an extract of the RPG for the Greater Dublin Area (2010-2022), which identifies Enfield as a Level 3: Town and / or District Centres & Sub-County Town Centres:

Figure 8: The retail hierarchy of the Retail Strategy for the Greater Dublin Area 2008-2016

Retail Hierarchy for the GDA	
LEVEL 1	METROPOLITAN CENTRE
	Dublin City Centre
LEVEL 2	MAJOR TOWN CENTRES & COUNTY TOWN CENTRES
	Fingal: Swords, Blanchardstown
	South Dublin: Tallaght, Liffey Valley
	Dun Laoghaire: Dun Laoghaire, Dundrum
	Wicklow: Bray, Wicklow
	Meath: Navan
	Kildare: Naas / Newbridge, Leixlip (including Collinstown*)
LEVEL 3	TOWN AND/OR DISTRICT CENTRES & SUB-COUNTY TOWN CENTRES (Not definitive list, see 2008 GDA Retail Strategy)
	Dublin City: Finglas, Northside Shopping Centre, Ballyfermot, Rathmines, Crumlin Shopping Centre, Donaghmede Shopping Centre, Omni, Ballymun, Point Village and Poolbeg
	Fingal: Malahide, Balbriggan, Skerries, Charlestown.
	South Dublin: Adamstown, Crumlin (Ashleaf), Clonburris/Balgaddy, Clondalkin, Fortunestown, Kilnamanagh, Lucan, Rathfarnham
	Dun Laoghaire Rathdown: Stillorgan, Blackrock, Cornelscourt, Nutgrove, Cherrywood.
	Wicklow: Greystones, Arklow, Blessington, Baltinglass
	Meath: Ashbourne, Dunboyne**, Dunshaughlin, Keils, Trim, Laytown/Bettystown, Enfield.
	Kildare: Celbridge, Kilcock, and Maynooth, Kilcullen, Athy, Kildare, Monasterevin, Clane.
LEVEL 4	NEIGHBOURHOOD CENTRES, LOCAL CENTRES-SMALL TOWNS AND VILLAGES
LEVEL 5	CORNER SHOPS/SMALL VILLAGES

*Leixlip and the Collinstown area will develop along a 20 year time period reaching level 2 status

**Dunboyne will gradually develop over the next 20 years towards level 2 status

Figure 6.1 – Extract of Figure 8 (Retail Hierarchy) from the RPG for Greater Dublin Area



- 5.4 Section 6.5 of the Draft RSES states that the retail expressed in the GDA strategy is substantially reflected in current city and county development plans and is presented here combined with the existing retail hierarchy in the remainder of the Region that was not included in the GDA.
- 5.5 However, Legendstar notes that Table 6.1 (Retail Hierarchy for the EMRA) of the Draft RSES (included as Figure 6.2 below) does not include the settlement of Enfield in the retail hierarchy.

Retail Hierarchy for the EMRA	
LEVEL 1	METROPOLITAN CENTRE Dublin City Centre
LEVEL 2	MAJOR TOWN CENTRES & COUNTY (principal) TOWN CENTRES Fingal Swords, Blanchardstown Leath Drogheda, Dundalk South Dublin Tallaght, Liffey Valley Longford Longford Dun Laoghaire Dun Laoghaire, Dundrum Laois Portlaoise Wicklow Bray, Wicklow Westmeath Athlone, Mullingar Meath Navan Offaly Tullamore Kildare Naas / Newbridge, Maynooth
LEVEL 3	TOWN AND/OR DISTRICT CENTRES & SUB-COUNTY TOWN CENTRES (key service centres) Dublin City Finglas, Northside Shopping Centre, Ballyfermot, Rathmines, Crumlin Shopping Centre, Donaghmede Shopping Centre, O'mahony, Ballymun, Point Village and Poolbeg, Clongriffin / Belmayne, Phibsborough, Naas Road Fingal Malahide, Balbriggan, Skerries, Charlestown South Dublin Adamstown, Crumlin (Ashlea), Clonburris, Clondalkin, Crywest, Kilnamanagh, Lucan, Rathfarnham Dun Laoghaire Rathdown Stillorgan, Blackrock, Cornelscourt, Nutgrove, Cherrywood Wicklow Greystones, Arklow, Blessington (Baltinglass, Rathdrum, Newtownmountkennedy) Meath Ashbourne, Dunshaughlin, Kelis, Trim (Laytown/Bettystown) Kildare Leixbridge, Kiceock, Kiceullen, Athy Kildare Monasterevin, Clane, Lexlip Laois Portlaoise, Graiguecullen Leath Ardee, Drogheda District Centre, Mathews Lane, Dundalk District Centres, Dublin Road & Ard Easumunn Offaly Birr, Edenderry Westmeath Castlepollard Longford Granard
LEVEL 4	NEIGHBOURHOOD CENTRES, LOCAL CENTRES-SMALL TOWNS AND VILLAGES
LEVEL 5	CORNER SHOPS/SMALL VILLAGES

Table 6.1: Retail hierarchy for the EMRA

Figure 6.2 – Extract from Draft RSES (Table 6.1: Retail Hierarchy for the EMRA)

- 5.6 Enfield includes a range of facilities including several supermarkets (Tesco Express and Supervalu), two petrol stations, hairdressers, pubs, cafes, takeaways and other local businesses. The town centre also includes bus stops and a rail station which links to the wider hinterland, and into Dublin.

- 5.7 There is no justification for the exclusion of the town centre of Enfield, as it clearly continues to fulfil its function as a town centre for County Meath, as expressed in the MCDP (2013-2019) and which has been identified as a Moderate Sustainable Growth Town at variation no.3 of the MCDP.

Recommended changes

- 5.8 It is recommended that for consistency, the town centre of Enfield, County Meath is referred to as a Level 3 (Town and / or District Centres & Sub-County Town Centres (key service centres) in Table 6.1 of the RSES.

6.0 Conclusion

6.1 Therefore, we submit that the RSES is amended to include:

- Clarity regarding the household growth for each individual local authority in the region;
- An additional column could be included in the "County Population Tables" listing those authorities that can avail to the supplementary 25% headroom;
- Moderate Sustainable Growth Towns as an additional settlement typology in the RSES;
- Enfield, County Meath as a specific Moderate Sustainable Growth Town; and
- The town centre of Enfield, County Meath as a Level 3 (Town and / or District Centres & Sub-County Town Centres (key service centres) in Table 6.1 of the RSES.

6.2 If the case of the inclusion of the "Moderate Sustainable Growth Town" is not accepted by the Regional Assembly, Legendstar would still suggest that the RSES needs to reflect the potential of Enfield, as identified in Variation No.3 of the MCDP to enable maximum advantage being taken from its existing rail and bus connections to Dublin City, and proximity to other employment centres, such as Maynooth and Kilcock to the east.

6.3 We trust that this submission will be taken into consideration in the preparation of the Regional Spatial Economic Strategy for the Eastern and Midland Region.