

Mr. Jim Conway, Director,  
The Eastern & Midland Regional Assembly,  
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Main Street, Ballymun,  
Dublin 9

23<sup>rd</sup> January 2019

**Re: Submission to Draft RSES for the Eastern & Midlands Region**

Dear Mr. Conway,

As you will be aware Mullingar Chamber's previous submission to the Draft RSES for the EMRA in February 2018 engaged the services of Henk Van der Kamp MScEng, FIPI, MIEI to advise and inform us in our submission and which promoted *a more balanced approach to regional development*.

The submission stated:

- *It is strongly suggested that the Regional Spatial and Economic Strategy should consider an alternative way of accommodating the 28 square kilometres of housing land required.*
- *That the Regional Spatial and Economic Strategy for the region should allocate a proportion of the 50% allocated to Dublin to a cluster of towns in the Midlands, say 20%.*
- *The NPF target to provide 125,000 dwelling units within Dublin City and its suburbs is difficult to achieve.*
- *The Midlands can accommodate population growth and jobs and facilitate a move away from the monocentric nature of the Capital.*
- *That 20% of the additional dwelling units to be built in the region could be located in the Midlands Gateway.*
- *In addition, the Midlands should accommodate a proportion of the 330,000 additional jobs planned for the region.*
- *As well as the difficulty to accommodate the dwelling units within the city of Dublin, a polycentric settlement pattern with the Midlands cluster of towns linked to the capital can exploit strategic advantages in the areas of: attracting employment, reducing commuting times, and providing a choice of living environments to new households.*

We note that the Draft RSES and associated Appendices potentially undermine any sustainable growth patterns associated with the Key Town of Mullingar and also the 'purported' Regional Growth Centre of Athlone.

The stated objectives for *Mullingar Key Town* are not very significant and do not provide a strategic vision or focus for development other than that restricted to the stated objectives related to; tourism & recreation (RPO 4.43), development of public-owned land banks (RPO 4.44) and the development of the Regional Hospital (RPO 4.45).

We propose and endorse far more sustainable spatial and economic growth objectives associated with Mullingar to provide for; the employment potential to facilitate reverse commuting from the Dublin Metropolitan Area, rather than the limited population growth to serve the jobs market in Dublin.

It is somewhat disappointing to note that whilst the RSES document has a task to accommodate additional growth, the current strategy only sets targets for population at county level and not for individual settlements. If Mullingar is to fulfil the role of a 'key town' perhaps a population growth figure should be indicated which should be above the average growth figure for the county.

There is widely held concern at local authority level (Westmeath County Council) and as is shared by the Chamber with our involvement in the Planning & Transportation, Strategic Policy Committee (SPC) that the draft RSES does not provide appropriate housing targets for Westmeath, and crucially Mullingar as a Key Service Town.

It is vital that the RSES provides for sufficient critical mass in terms of population, employment and service provision and does not unduly artificially constrict the growth of Mullingar or place unrealistic limits in relation to population growth and housing to accommodate this growth. Such a scenario would limit government's ability to realise return on current and future capital investment in the town.

Greater recognition to the role that Mullingar plays in the region should be acknowledged. Given the town has been identified in the Draft RSES as both an employment and service growth centre, with a high ratio of jobs to resident workers, the Regional Policy Objectives for the town should be expanded to include the following:

- Support Mullingar's role as an important employment hub by promoting economic development and clustering of related enterprises in areas such as engineering and ICT; consumer products; financial services; shared services (Multi-lingual) and R&D.
- Realise the potential of the existing IDA presence and property in Mullingar.
- Support Foreign Direct Investment in Mullingar at an appropriate scale commensurate with its role as a Key Town and County Town in the Region.
- Enhance the existing base of both indigenous and international companies at the forefront of their field, in sectors such as engineering, robotics and advanced manufacturing.
- Advance the development of high-quality enterprise and employment zones.
- Realisation of existing business parks potential.
- To actively support and incentivise economic development and regeneration of the town centre.
- Support the preparation of Regeneration Master Plans within Mullingar and support associated funding proposals under the Urban Regeneration and Development Fund.
- Developing innovative initiatives in the smart delivery of business and service solutions in Mullingar.

It is important to note that *Figure 6.5 EMRA's Enterprise Development and Innovation Assets Map* at page 92 whilst highlighting the presence of IDA Parks and Sites, indicates 1 no. site as opposed to the 2 no. sites present. Additionally, there is no reference to the National Science Park or the Advanced Manufacturing Research Centre and in line with the presence of a number of privately owned and developed business parks and locations thus underplays the significance and importance of the employment base of Mullingar which rivals Athlone and Maynooth in status, as opposed to Longford and Tullamore.

The understated significance of Mullingar within the Draft RSES *Assets Map* underplays the potential counterbalance to Dublin and the alternative model as proposed in our originating submission; providing high quality living environments associated with balanced regional development to facilitate reverse commuting from the Dublin Metropolitan Area, rather than the limited population growth to serve the jobs market in Dublin.

Mullingar Chamber of Commerce considers that from a planning perspective the key to economic success for Mullingar and the Midlands is best expressed in terms of our proximity to the thriving Dublin region. The focus should remain however on balancing the economic development of the region by developing jobs and employment as well as housing within the region itself and not simply developing it as a commuter belt to service the capital city. Our submission therefore sets out how Mullingar and the Midlands can achieve it's full employment potential by optimising our *special relationship* with the Dublin region to our best advantage.

Mullingar Chamber wishes to emphasise the extent of the growth underestimation, given that Mullingar has doubled in population in the last twenty years and the current constraints to growth in Dublin, being at bursting point. It would be perfectly realistic to suggest that there could a very rapid move to utilise alternative employment centres outside of Dublin but within the catchment area and in this context and the need for local employment we need IDA advanced factory and Office space to be installed in Mullingar, leveraging the available infrastructure.

We also advocate strongly in favour of the development of the N52 as a National Primary Route running from north to south and linking all the major motorways in the Region together thereby connecting towns and directing their business towards neighbouring regions and not only towards Dublin.

We remain eager and open at all times to constructive consultation with your office on any matter in which we can be of assistance and we take this opportunity to express our continued support for you in the formulation of the Economic plan for the Region.

Yours Sincerely

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**Tom Hyland**  
President Mullingar Chamber of Commerce

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**Submission on behalf of the Mullingar Chamber of Commerce to the Regional Spatial and Economic Strategy consultation phase.**

**THIRD REVISED DRAFT**

February 2018

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## 1 Introduction

Mullingar Chamber of Commerce represents the business interests of its Members and strives improve the business climate in Mullingar and the surrounding areas and to promote and develop it as a prominent place to do business, an advantageous location for industry, a rewarding tourist destination and as a desirable place to live.

## 2 Can Dublin City and Suburbs Provide for 143,000 Extra Housing Units?

The NPF states that of the additional one million people that will be living in Ireland by 2040, between 475,000 and 500,000 will be living in the Eastern and Midland Region of which 265,000 will be living in Dublin City and its suburbs.<sup>1</sup> In other words: 50% of the national population growth will happen in the region and of that additional population, 50% will happen in the city of Dublin.

If one translates this into dwelling units and housing land that is required, the following picture emerges. To accommodate housing needs of existing and additional population during the NPF plan period, a total of 550,000 houses will need to be built. The number of houses to be built in Dublin city and its suburbs will be 143,000.<sup>2</sup> The Dublin City Development Plan is based on an average density of 100 dwelling units per hectare to be achieved in the city council area. In the suburbs the three county council development plans have more modest targets of between 35 and 50 dwellings per hectare. It is therefore reasonable to assume an average density for Dublin City and suburbs of 50 dwellings per hectare. This would equate to a need for 2860 hectares; more than 28 square kilometres of development land to be found within the city and its suburbs.

The NPF has the policy to achieve compact urban development: ...*"the Ireland 2040 strategy to plan for these anticipated changes is to grow the regions, build centres of scale and ensure more compact and sustainable forms of development that can be supported by investment, fiscal measures and new governance and institutional arrangements."*<sup>3</sup> The question arises whether this is feasible given the number of dwellings to be accommodated in Dublin alone. **It is strongly suggested in this submission that the Regional Spatial and Economic Strategy should consider an alternative way of accommodating the 28 square kilometres of housing land required.**

## 3 A Polycentric Concept for the Region

During the period of the NSS Dublin has effectively remained a monocentric city with an increasing degree of urban sprawl resulting in large commuting flows into the city from the outlying urban areas. The suggested concept in this submission is to link the towns in the Midlands to Dublin. By linking the Midlands to the Capital, Dublin can change from the existing monocentric city to a polycentric urban network.

Apart from the 50% of the additional households in the region that should be accommodated in Dublin the NPF leaves population targets for other large towns to the Regional Strategies. However, it is an objective of the NPF that 16% of total population growth should be accommodated in large towns defined as above 10,000 population.<sup>4</sup> This would leave the remainder to be housed in smaller settlements and the rural area. **This submission suggests that the Regional Spatial and Economic Strategy for the region should allocate a proportion of the 50% allocated to Dublin to a cluster of towns in the Midlands, say 20%.** This would result in the following distribution of population: 30% Dublin, 20% Midlands Gateway, 16% other towns above 10,000 population and the remainder elsewhere. See table 1.

Settlement	NPF	Alternative
Dublin City & Suburbs	264,000 (50%)	158,400 (30%)
Midlands Cluster		105,600 (20%)
Towns > 10,000 pop.	84,480 (16%)	84,480 (16%)

<sup>1</sup> Ireland 2040 – Our Plan – draft National Planning Framework, Govt. of Ireland, October 2017, p. 39.

<sup>2</sup> Ireland 2040 – Our Plan – draft National Planning Framework, Govt. of Ireland, October 2017, p. 88.

<sup>3</sup> Ireland 2040 – Our Plan – draft National Planning Framework, Govt. of Ireland, October 2017, p. 47.

<sup>4</sup> Ireland 2040 – Our Plan – draft National Planning Framework, Govt. of Ireland, October 2017, Policy Objective 2b, p. 37.

Remainder of region	179,520 (rest)	179,520 (rest)
Total	528,000	528,000

Table 1 – Suggested Distribution of Population

Apart from the difficulty to find 28 sq km of housing land within the city of Dublin and its suburbs, there are other arguments in favour of directing population growth within the region to the Midlands in what is identified as the 'Outer EMRA region'.<sup>5</sup> These arguments are compelling as they provide strategic selling points for the Eastern and Midlands Region.

Three of these arguments are explained in this submission:

- Travel times to key locations in the region are favourable
- Opportunity to reduce long distance commuting patterns
- Opportunity to provide a choice of living environments.

#### 4 Travel Times to Key Locations in the Region

The M4 and M6 motorways plus rail connections that link Dublin with Athlone, Mullingar and Tullamore, provide underused infrastructure in proximity to the Capital. This is clear from traffic volume statistics. Table 2 illustrates the lack of traffic congestion and the availability of both road and rail capacity in a Midlands area linked to the Capital. The M6 at Kinnegad has traffic volumes that are less than one tenth of those experienced on the M50.

Road	Location	AADT
M50	Red Cow J9/J10	125708
N4	Lucan J3/J4	78425
M1	Swords N J4/J5	55098
M4	Mullingar J16/J17	17713
M6	Kinnegad E J4/J5	11748

Table 2 – Transport Infrastructure Capacity<sup>6</sup>

The proximity of the Midlands to the Capital can also be illustrated with the relatively short travel times to key locations. Relatively short travel times are helped by the reliability of such travel times made possible as a result of the general lack of traffic congestion on the national roads M4, M6 and also N52. For example, the travel time from Dublin airport to Mullingar is one hour, while the travel time from Maynooth University to Mullingar is similar to the travel time from Maynooth to Dublin City Centre.

#### 5 Long Distance Commuting

The percentage of workers whose commuting times are more than one hour is significantly higher in counties Kildare, Offaly and Westmeath than it is in the Dublin region. Significant commuting times above the national average therefore occur outside the Dublin region. See table 3. This suggests that currently a concentration of jobs exists in the Dublin region compared to the location of the labour force. A mismatch between jobs in the Dublin region and households in the outer areas can be corrected relatively easily if jobs are allowed to locate in the outer areas rather than forcing all households to live in the Dublin region. This will also contribute to more efficient use of transport infrastructure capacity by facilitating two way commuting flows.

A Midlands cluster of towns linked to the Capital can be effectively marketed internationally as providing good locations for inward investment accessible to a large labour market and key infrastructure such as Dublin Airport, Maynooth University and Athlone Institute of Technology while avoiding the congestion aspects manifested in the form of traffic congestions and high house prices. The Midlands can thus form a key asset for the Regional Assembly.

<sup>5</sup> EMRA - Socio-Economic Evidence Baseline Report, 2017, map p. 155.

<sup>6</sup> Source: [www.nratrafficdata.ie](http://www.nratrafficdata.ie)

Area	Total workers	No. commuting more than one hour	Percentage commuting > 1 hour
GDA	517800	44493	8.6
Kildare	82142	12652	15.4
Westmeath	30221	3971	13.1
Offaly	25577	3091	12.1
State	1695074	152465	9.0

Table 3 – Commuting Times<sup>7</sup>

It is therefore suggested that of the additional 330,000 jobs to be accommodated in the Eastern and Midlands Region area<sup>8</sup>, a significant proportion could be located in the Midlands area. This would be made easier as a result of the additional population growth of ca. 100,000 people for the Midlands suggested in this submission. Such an additional jobs allocation would also contribute to a more balanced pattern of two way commuting flows instead of commuting patterns to be in one direction only, i.e. people in the outlying areas and jobs in Dublin.

## 6 The Importance of the Residential Environment

Depending on size of household and position in the life cycle (young family vs middle aged) housing demands can vary significantly. Such demands extend not only to the type of housing unit (e.g. apartment vs. house with garden) but also the residential environment within which the dwelling unit is located (e.g. urban vs suburban). Important efforts to create sustainability are focused on high density city centre environments where concentrations of jobs can be offered and good quality public transport exists. However, equal attention is justified for locating development outside the central zones but near to public transport nodes or multi/modal interchanges.

The Midlands cluster being linked to the capital can offer an alternative lifestyle in addition to (and in contrast with) the more urban lifestyle of Dublin City (see box: 'midlands vs docklands'). International research shows that there are many types of residential environments that can be distinguished but with the two most popular and dominant ones being: (a) city centre high density living and (b) more suburban green dominant living. The poor quality environment of suburban sprawl provides neither of these types of residential environments as the benefits that high density urban living brings are not achieved (e.g. access to large range of services) while it also does not offer the quality environment that comes with good access to the countryside.

### Midlands vs Docklands

There is a risk that sustainable residential development is considered synonymous with high density urban development. However, while high density urban living is increasingly popular and reflects the general trend of movements towards the cities, a significant number of households prefer a residential environment where the (real or perceived) disadvantages of city centre urban living are avoided and the attractions of easy access to recreational amenities can be accommodated. This difference in priorities is also affected by the stage a household is in its lifecycle. It is therefore inappropriate to focus on one type of residential environment alone. Not every family is willing to live in an apartment even if the quality of the apartment can be improved from standards in the past. The key to successful cities is that different environments can be provided, allowing for choice. However, all environments need to be high quality. This can be achieved by good design (sustainable neighbourhoods) and good transport accessibility. Towns in the Midlands can make an important contribution to the demand for such high quality residential environments which the suburbs of Dublin fail to provide.

<sup>7</sup> Census 2011, Profile 10 Door to Door, CSO, 2012, table 6, p. 42.

<sup>8</sup> Ireland 2040 – Our Plan – draft National Planning Framework, Govt. of Ireland, October 2017, Table 2.1, p. 39.



## **7 Conclusion**

- **The NPF target to provide 125,000 dwelling units within Dublin City and its suburbs is difficult to achieve.**
- **The Midlands can accommodate population growth and jobs and facilitate a move away from the monocentric nature of the Capital.**
- **This submission suggests that 20% of the additional dwelling units to be built in the region could be located in the Midlands Gateway.**
- **In addition, the Midlands should accommodate a proportion of the 330,000 additional jobs planned for the region.**
- **As well as the difficulty to accommodate the dwelling units within the city of Dublin, a polycentric settlement pattern with the Midlands cluster of towns linked to the capital can exploit strategic advantages in the areas of: attracting employment, reducing commuting times, and providing a choice of living environments to new households.**

