

Heather Cooke

From: Nathan Smith <nsmith@mhplanning.ie>
Sent: 23 January 2019 16:15
To: RSES
Subject: Response to the Draft RSES Eastern and Midland Region: Ebbertson Ltd
Attachments: RPT_Draft RSES Representations for Ebbertson Ltd_190122_SUBMITTED.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Sir / Madam

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

I would be grateful if you could confirm receipt.

Nathan Smith
Senior Planning Consultant

McCutcheon Halley
CHARTERED
CONSULTANTS

PLANNING **Cork**

6 Joyce House, Barrack Square
Ballincollig, Co. Cork, P31 YX97

Tel. +353 (0)21 420 8710

Dublin

Kreston House, Arran Court,
Arran Quay, Dublin 7, D07 K271

Tel. +353 (0)1 8044477

Mob +353 (0) 860493146

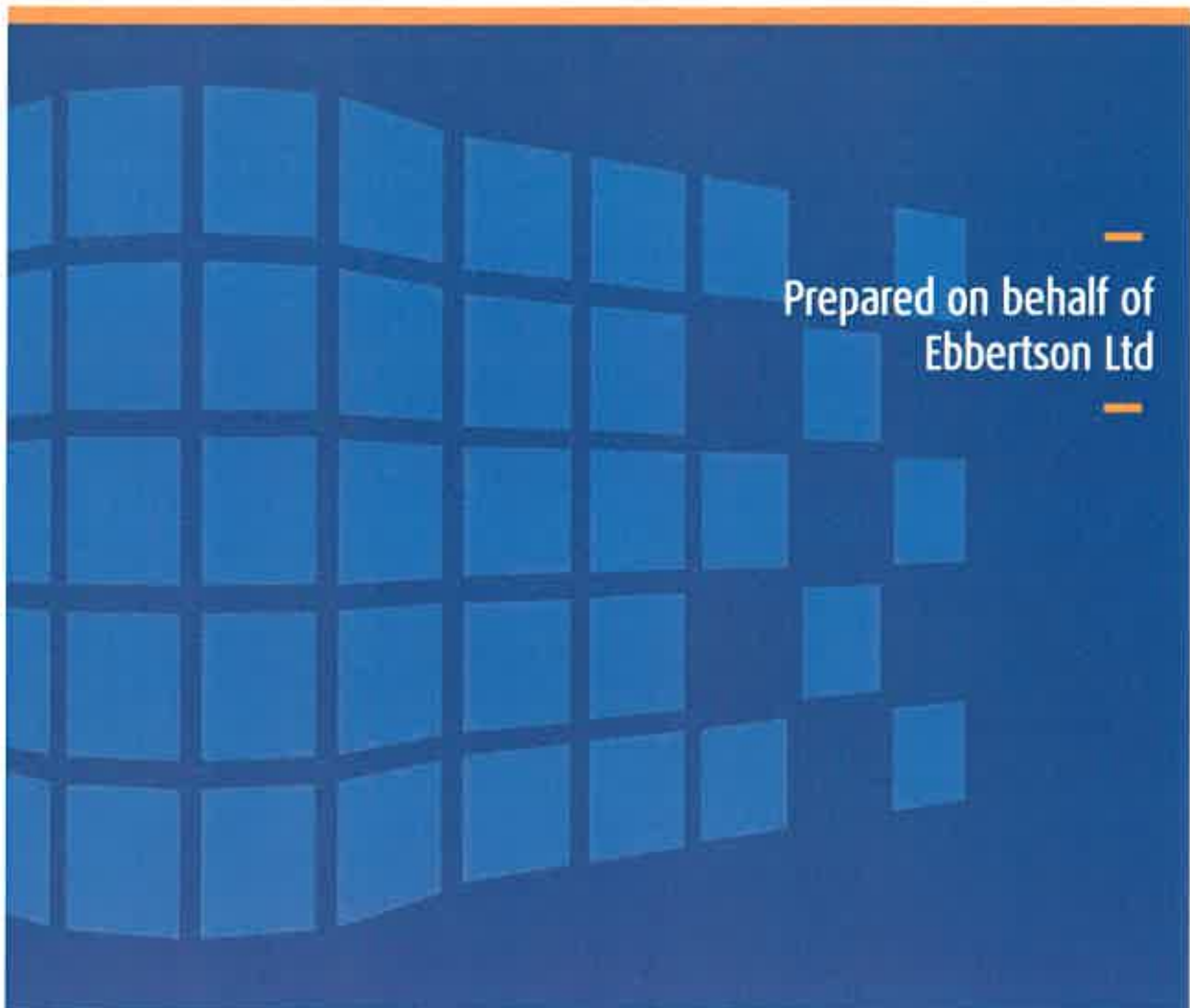
www.mhplanning.ie

The information transmitted in this email is intended for the addresses only and may contain confidential and/or privileged material. Any review, retransmission, dissemination, reliance upon or other use of this information by persons or entities other than the addressee is prohibited. If you receive this in error, please contact the sender and delete the material.

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

Donacorney, County Meath

January 2019



Document Control Sheet

Client	Ebbertson Ltd			
Project Title	Doncarney- RSES			
Document Title	Response to the Draft RSES for EM			
Document No.				
OSI Licence No	EN0005415			
Document Comprises	DCS	TOC	Text	Appendices
	1	1	"Number"	"Number"
Prepared by	NS	Checked by	JK	

Rev.	Status	Issue Date
1	Issued	21.01.19

Contents

1.0	Introduction.....	4
2.0	Location, Context and Proposal.....	5
3.0	Proposed Amendments to the Regional Spatial and Economic Strategy.....	10
4.0	Conclusion.....	21

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, Ebbertson Ltd who have various interests throughout County Meath.
- 1.2 This submission specifically relates to their lands at Donacamey, Co. Meath (refer to Figure 2.1). The purpose of this submission is to strengthen and enhance the contribution these lands will make to the residential growth and development of the settlement of Laytown-Bettystown-Mornington-Donacamey.
- 1.3 Ebbertson Ltd 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

- 1.4 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.
- 1.5 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.
- 1.6 Ebbertson Ltd 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 Location, Context and Proposal

Location and Context

2.1 Laytown-Bettystown-Mornington East is defined as a small town and Donacorney-Mornington defined as a village in the MCDP settlement hierarchy. Collectively the settlements of Laytown-Bettystown-Mornington East and Donacorney-Mornington occupy a strategic location on the east coast within close proximity to:

- the National Gateway of Dublin, Dublin Airport;
- the Dublin–Belfast railway line;
- the M1 Dublin–Belfast Economic Corridor; and
- Drogheda.

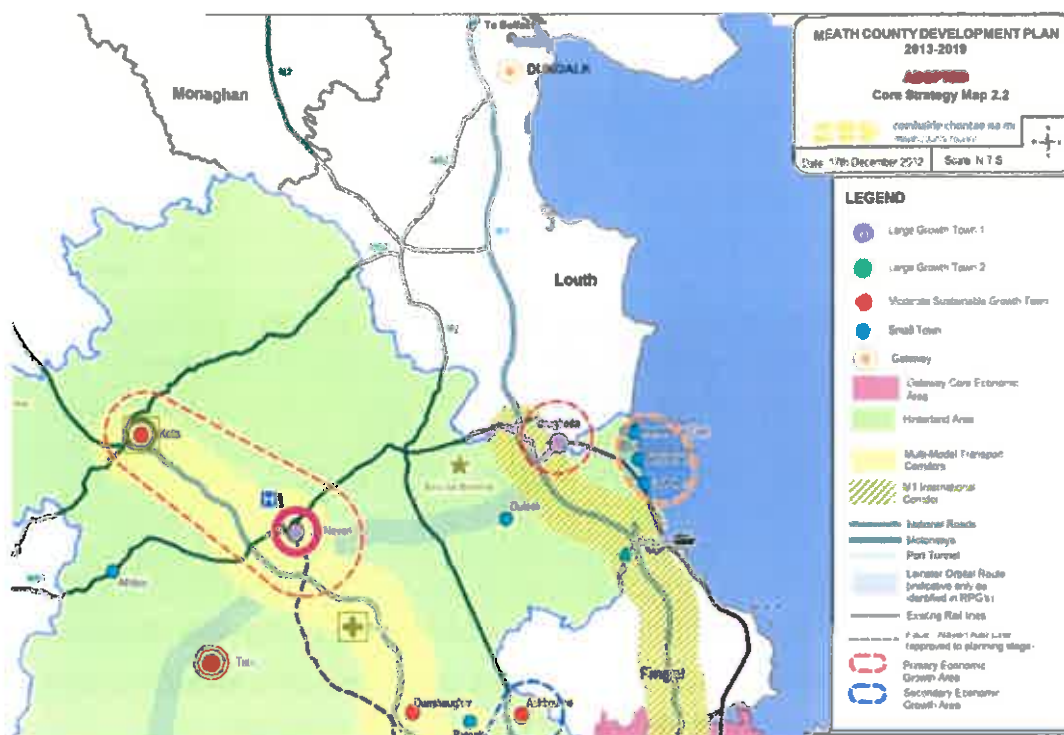


Figure 2.1 – Extract from East Meath LAP (Core Strategy Map 2.2)

- 2.2 Its location and outstanding accessibility place the settlement area in a unique position to harness the potential for sustainable employment and residential growth.
- 2.3 The settlement has a very good public transport provision, providing links to Dublin, Dundalk, Newry that includes key employment destinations, including the University College Dublin and

Origin	Service	Destination	Frequency
Laytown Donacarney-Bettystown-Mornington	Bus Eireann - D1 Bus Route	Drogheda	Monday to Friday: Service to Drogheda starts at 07:00 and operates every 30 minutes from 07:45. Return journey operates at the same frequency
Laytown-Donacarney-Bettystown-Mornington	Matthews - Route 912	Irish Financial Services Centre, Dublin	07:20 morning service, Monday to Friday. Return journey operates at 17:30.
Laytown-Donacarney-Bettystown-Mornington	Matthews - Route 910	University College Dublin, Dublin	06:50 morning service, Monday to Friday. Return journey operates at 17:15.
Bettystown-Laytown	Matthews	Dublin	Monday to Friday: Every 30 minutes from 05:30 to 09:00, then hourly until 13:00 when 30 minute frequency resumes. Weekend service also operating at a reduced frequency, approximately every 1 to 2 hours. Return journey operates at similar frequency.
Laytown	Irish Rail – Rail Service	Dundalk/Newry-Dublin	Monday to Friday: Service frequency varies throughout the day from every 15 to 20 minutes during am and pm peak periods and approximately every 30 to 60 minutes in between. Weekend services also operate, with 1 to 2 trains each hour.

Table 2.1 – Public Transport Links for Laytown-Donacarney-Bettystown-Mornington

- 2.4 Ebbertson Ltds' land comprises c. 9.5 acres and is located adjacent to the newly constructed Bunscoil Realt na Mara that caters for 1,200 pupils in Donacarney, County Meath.

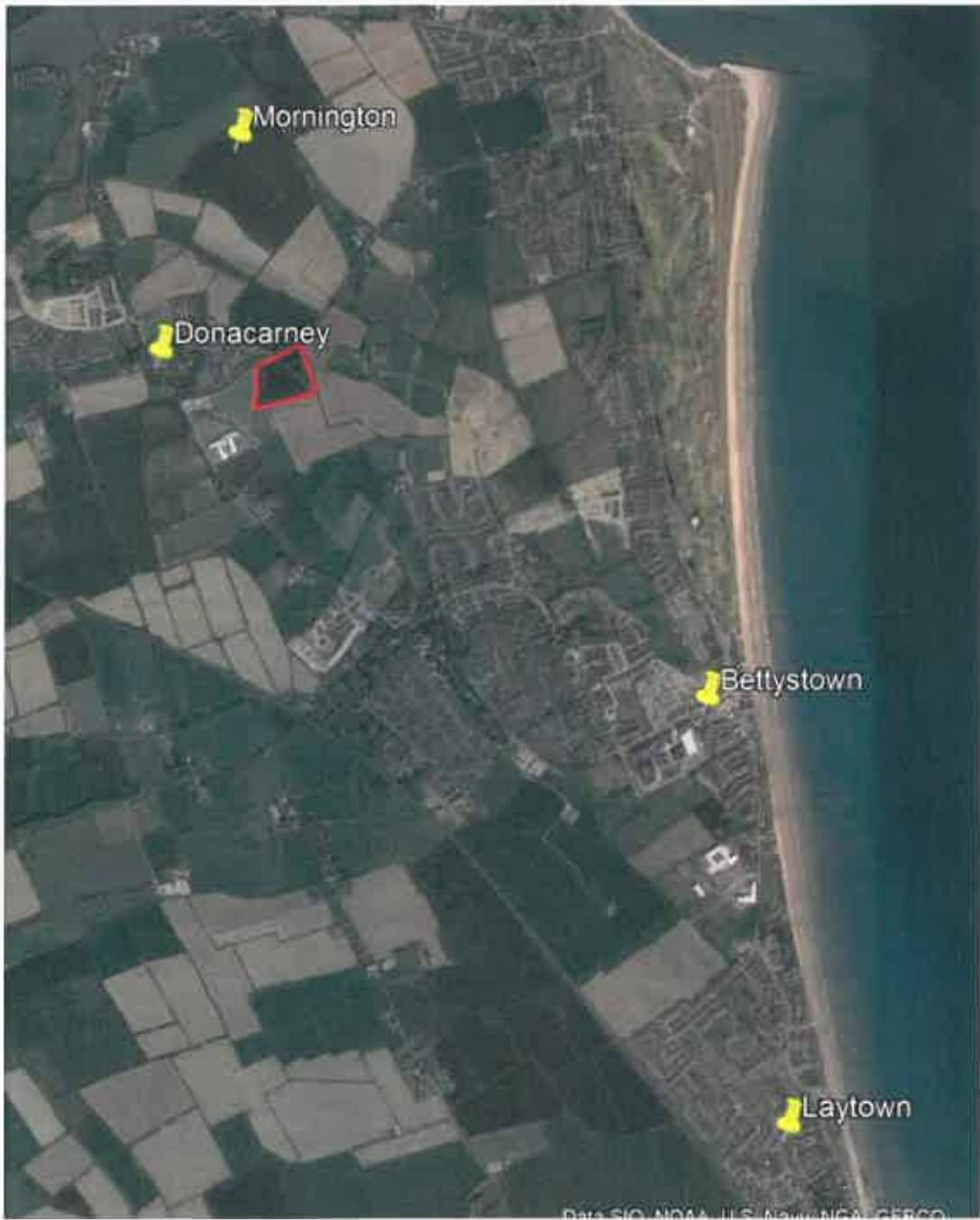


Figure 2.1 – Location of Ebberton Ltd's land at Donacarney

- 2.5 The land is not currently zoned in the East Meath Local Area Plan (2014-2020), as defined in Figure 2.2.

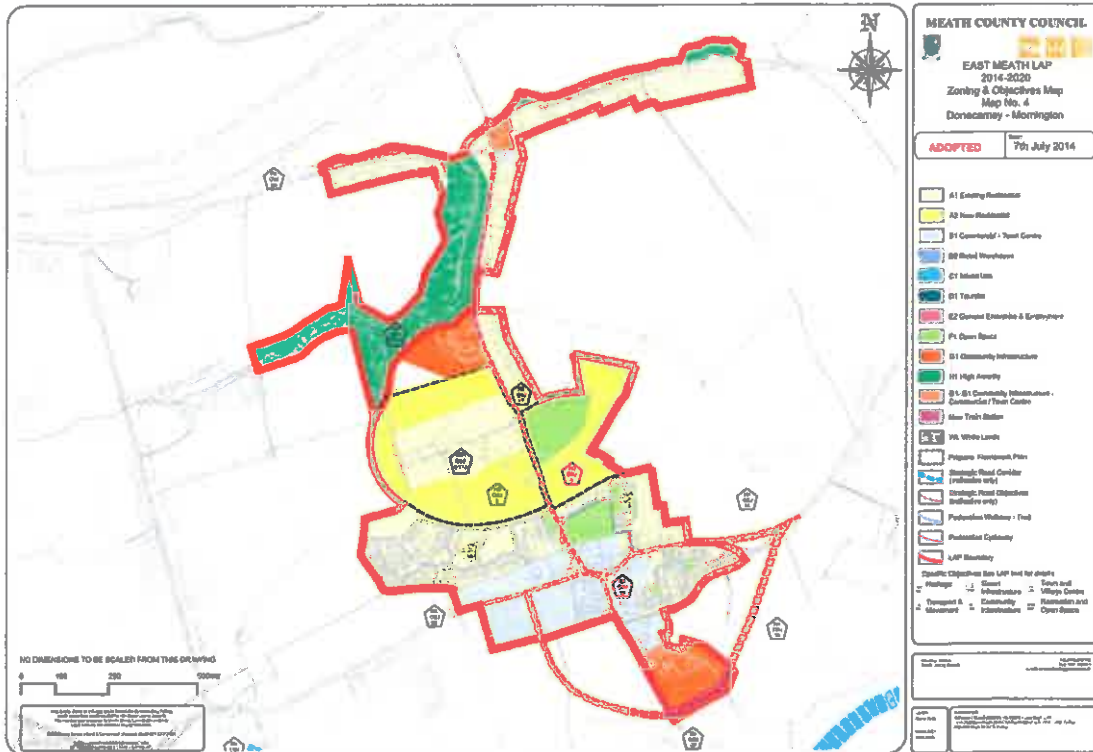


Figure 2.2 – Extract from East Meath LAP (Map No.4) Donacarney-Mornington

- 2.6 The site, depicted in a revised extract of the adopted *East Meath LAP 2014 – 2020*, is outlined in Figure 2.3 of this report by a blue line and also shows an indicative road line (TM OBJ14) with a purple-dashed line. The site is under the ownership of Eberston Ltd.
- 2.7 The proposed submission to the draft Meath Development Plan will seek:
- a changing of the site to A2 New Residential zoned land, together with some adjoining land, and the extension of the LPP boundary. Eberston Ltd. are currently negotiating with two adjoining land-owners in relation to the rezoning and no concerns have been raised to date; and
 - the inclusion in the Development Plan of a revised road line as depicted by the purple-dashed line (TM OBJ14) in Figure 2.3.
- 2.8 A proposed Strategic Road Objective has been provided in the existing East Meath LAP but it is considered that the suggested route severely restricts the development potential of the site identified. The revised road layout will better facilitate future development and ensure the viability of any residential scheme at this location. Eberston Ltd. are committed to providing the construction of the road subject to the rezoning of the land enclosed by the new road line. This proposed revision to the draft Meath Development Plan will also see the provision of much needed housing units for the Donacarney area.



Figure 2.3: Site adjacent to Bunscoil Realt na Mara to be rezoned, outlined in blue, along with a revised Strategic Road Objective route

3.0 Proposed Amendments to the Regional Spatial and Economic Strategy

Spatial and Economic Policy Background (1.4) - objection

- 3.1 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, Dundalk, Sligo and Letterkenny. This policy approach has implications for population growth in the Eastern and Midland Region
- 3.2 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.
- 3.3 It should be noted that County Meath is one of the most active authorities in the Eastern and Midlands region for residential construction, which is concentrated in southern and eastern parts of the County, which includes Laytown-Bettystown-Mornington-Donacamey.
- 3.4 Therefore, whilst there is evidence that during the 2013-2016 period that there is a shortfall in the delivery of homes, against the housing requirement as set out in the MCDP, the RSES policy of “regional parity” could undermine the improving rates of residential and economic delivery / investment in the County

Recommended change

- 3.5 Therefore, in the immediate short term, it is essential that the RSES continues to support the sustainable expansion of settlements in County Meath which are capable of delivering plan led, evidence-based communities that capable of adhering to the overarching objectives as set out in the NPF.
- 3.6 The locational advantage and importance of the combined settlement of Laytown-Bettystown-Mornington-Donacamey should be considered in this context. Therefore, the RSES, should be amended to reflect these points.

Regional Profile (1.6)

A growing region - comment and recommended changes

- 3.7 It is noted that from 2006 to 2016, the Region by 15% (an increase of over 300,000 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.

- 3.8 It should be noted that the influence of Dublin (as the Region's key influence by way of employment location) on settlements and their respective growth remains apparent, with the commuter based settlements in East Meath (including Laytown-Bettystown-Mornington-Donacamey) experiencing some of the highest levels of population growth.
- 3.9 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% of the headroom to be added to the 2026 population projection, which is supported by Ebbertson Ltd.
- 3.10 However, the population growth figures have not translated the population growth into household growth.

Recommended changes

- 3.11 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.
- 3.12 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.

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

- 3.13 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.
- 3.14 It is noted that in terms of the potential spatial scenarios identified, table 3.2 of the Draft RSES 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.
- 3.15 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.
- 3.16 It is noted that the "Laytown-Bettystown" are identified on Figure 4.1 (EMRA Large Towns (>10,000 population) of the Draft RSES as a settlement of more than 10,000 people (based on the Census 2016). The evidence base to the RSES Issues and Options paper titled "Eastern: Strategic Planning Area (SPA), Socio-Economic Evidence Baseline Report, November 2017), includes a range of statistics and evidence, which has been used to inform the RSES.

- 3.17 Of note, is the population of Laytown-Bettystown referred to on page 17 of that document, titled "Population Density per Km2, Census 2016. It states that the settlement has a total population of 11,872, and this total population figures "includes Mornington-Donacarne".
- 3.18 However, the reference to "Mornington-Donacarne" has not been translated from the evidence base into the Draft RSES, which is ambiguous when referring to a settlement in that document.
- 3.19 In the case of Donacarne, Ebbertson Ltd is seeking to ensure that Donacarne is robustly referred to at the regional tier, to provide the necessary planning policy framework to realise their aspirations when considering the matter at the County Development stage.
- 3.20 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
- 3.21 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.
- 3.22 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."
- 3.23 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.

Settlement Hierarchy

- 3.24 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 Laytown and Bettystown (including Donacarne) have not been specifically in the settlement hierarchy providing the overarching strategic direction of development and growth in the region.
- 3.25 The combined settlement of Laytown/Bettystown/Donacarne/Mornington is strategically adjacent to the Dublin-Belfast Corridor (as defined in Figure 4.2: Settlement Strategy) of the Draft RSES, with excellent transport links and supporting infrastructure that serves the settlement, whilst also being located in close proximity to Drogheda Regional Growth Centre.
- 3.26 Of 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.

3.27 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

- 3.28 Ebbertson Ltd 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.
- 3.29 Ebbertson Ltd 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.
- 3.30 Ebbertson Ltd 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.
- 3.31 Therefore, Ebbertson Ltd 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	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		Laytown/ Bettystown/ Donacamey/Mornington	

Settlement Typology	Description	Areas		
		Metropolitan	Hinterland	Outer Region
	and for the surrounding rural areas. 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.			

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

3.32 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."*

Headroom – Support (with recommended changes)

- 3.33 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)

- 3.34 Ebbertson Ltd 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.
- 3.35 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.”

- 3.36 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 bringing 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.
- 3.37 Proactive land management therefore requires realistic prioritisation, proper monitoring and effective co-ordination across regional, metropolitan, city and county levels.”

Recommended changes

- 3.38 Whilst Ebbertson Ltd 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 RPO4.2 - Objection

- 3.39 Ebbertson Ltd 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. Ebbertson Ltd 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

- 3.40 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

- 3.41 Whilst Ebbertson Ltd 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).
- 3.42 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)

- 3.43 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”

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

- 3.44 Page 95 of the Draft RSES refers to each of the proposed settlement typologies. As Ebbertson Ltd 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 page 95 at section 6.4 of the Draft RSES.

Recommended changes

- 3.45 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

- 3.46 By way of reference Figure 6.1 is an extract of the RPG for the Greater Dublin Area (2010-2022), which identifies Laytown/Bettystown 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, Kells, 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

- 3.47 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.
- 3.48 Ebberton Ltd notes that Table 6.1 (Retail Hierarchy for the EMRA) of the Draft RSES (included as Figure 6.2 below) again refers Laytown /Bettystown, defined as "key service centres", where brackets are used.

Retail Hierarchy for the EMRA	
LEVEL 1	METROPOLITAN CENTRE Dublin City Centre
LEVEL 2	MAJOR TOWN CENTRES & COUNTY (principal) TOWN CENTRES Fingal: Swords, Blanchardstown Louth: 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 / Newaridge, 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, Omni, Ballymun, Point Village and Poolbeg, Clongriffin / Belmayne, Phibsborough, Naas Road Fingal: Malahide, Balbriggan, Skerries, Charlestown South Dublin: Adamstown, Crumlin (Ashlea), Clonburris, Clonsilla, Citywest, Kinamanagh, Lucan, Rathfarnham Dun Laoghaire: Rathdown, Stillorgan, Blackrock, Cornelscourt, Nutgrove, Cherrywood Wicklow: Greystones, Arklow, Blessington (Balsinglass, Rathdrum, Newtownmountkennedy) Meath: Ashbourne, Dunshaughlin, Kelis, Trim (Laytown/Bettystown) Kildare: Celbridge, Killock, Kilkullen, Athy, Kildare, Monasterevin, Clane, Lexlip Laois: Portlaoise, Graiguecullen Louth: Ardee, Drogheda District Centre, Mathews Lane, Dundalk District Centres, Dublin Road & Ard Easmunn 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)

Recommended changes

- 3.49 It is recommended that for consistency, with how the settlement is defined (in population terms) in the evidence base, “Mornington and Doncarney” should be added to the definition at Level 3 (Town and / or District Centres & Sub-County Town Centres (key service centres) in Table 6.1 of the RSES. It is also recommended there is no need for the use of “brackets” in Table 6.1, as this is inconsistent with the definitions as set out in the adopted RPG, and there is no evidence for how and why this hierarchy has been introduced into the RSES. Therefore, it should be deleted for the sake of clarity and consistency.

4.0 Conclusion

4.1 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;
- Laytown-Bettystown-Mornington-Donacarney, County Meath as a specific Moderate Sustainable Growth Town; and
- Amendment of Table 6.1 to refer to Laytown-Bettystown-Mornington-Donacarney as a Level 3 (Town and / or District Centres & Sub-County Town Centres (key service centres).

4.2 If the case of the inclusion of the “Moderate Sustainable Growth Town” is not accepted by the Regional Assembly, Ebbertson Ltd would still suggest that the RSES needs to reflect the potential of to Laytown-Bettystown-Mornington-Donacarney to accommodate sustainable, development led planned growth to enable maximum advantage being taken from its existing rail and bus connections to Dublin City, and proximity to other employment centres, such as Drogheda and Ashbourne.

4.3 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.

