

Heather Cooke

From: Student <Student@mhplanning.ie>
Sent: 23 January 2019 16:53
To: RSES
Cc: Jim Keogan; sharon@mcgarrellreilly.ie
Subject: Submission to Draft RSES
Attachments: Kilcock dRSES submission.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Sir/Madam,

Please find attached our submission to the draft Regional Spatial and Economic Strategy, on behalf of our client McGarrell Reilly Group, regarding lands located in Kilcock.

Regards,
Martina Keenan Rivero
McCutcheon Halley Chartered Planning Consultants

Eastern and Midland Regional Assembly
3rd Floor North, Ballymun Civic Centre
Main Street
Ballymun
Dublin

23 January 2019

Re: Kilcock and Environs, County Meath. Designation in Settlement Strategy within Draft Regional Spatial and Economic Strategy

Dear Sir/Madam,

INTRODUCTION

McGarrell Reilly Group welcome the publication of the draft Regional Spatial and Economic Strategy for the Eastern and Midland Region and the opportunity to participate in the consultation process. This submission has been prepared by McCutcheon Halley Chartered Planning Consultants, on behalf of McGarrell Reilly Group (MGR).

MGR own two parcels of land, having a total area of 14.5 hectares. The lands are situated within an area identified as 'Kilcock and Environs' that straddle the Local Authority areas of County Meath and County Kildare.

The Kilcock Environs in County Meath comprise approximately 105 hectares and are contiguous to the County Kildare administrative boundary. Kilcock is located 33km south-west of Dublin city centre and its proximity to Maynooth, Leixlip and Celbridge, is a crucial asset which contributes significantly to the residential, social and economic vitality of the town.

Kilcock currently has a population of 6,093 people (CSO, 2016). It has a well-established community and enjoys a wide range of social infrastructure including numerous sporting clubs and recreational facilities such as GAA, athletics, football, rugby and canoeing clubs, a musical society, playground, a gym and golf course. The town also benefits from childcare facilities and a full range of pre-school, national and secondary schools.

The 2016 Census revealed that the population of Kilcock is younger than the national average. 40% of the population are aged between 0 to 24 years, compared with the national average of 33%. Similarly, the proportion of the Kilcock population aged 25 to 44 years is 39%, compared with 29.5% across the nation. Thus the age profile of the Kilcock settlement represents a significant asset, with a young vibrant base and significant group of working age.

Its connectivity to adjoining towns and employment locations within the region has been strengthened in recent years by the development of the M4 motorway. Subsequently, the Dublin city centre can be reached within 35 minutes by car, while Celbridge and Leixlip are now only 17 minutes away.

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Kilcock is also located on the rail network and benefits from access to both the Dublin Connolly to Longford commuter service and Dublin to Sligo Intercity Service.

PURPOSE OF SUBMISSION

The purpose of this submission is to highlight the importance of Kilcock, as an existing 'Moderate Sustainable Growth Town' to the sustainable delivery of housing in the region. Changes proposed to the Settlement Hierarchy under the draft RSES may inhibit future development in 'Kilcock and its Environs'. The town and its surrounds play an important role within the Dublin Metropolitan Area as part of a wider network of towns and urban centres that provide housing and employment for the region.

As the RSES will require county and local plans to be consistent with its objectives, the provisions of the strategy have significant potential to help or hinder the conditions for future development in the region. It is therefore recommended that the importance of Kilcock to the region be recognised, by amending the Settlement Strategy within the draft RSES to provide more targeted policy direction at the County level.

REGIONAL PLANNING GUIDELINES FOR THE GREATER DUBLIN AREA 2010-2022

Under the Regional Planning Guidelines (RPG's) for the Greater Dublin Area 2010-2022, Kilcock is located within the Metropolitan area, in recognition of its strong integration and connections with the built-up area of Dublin. The Metropolitan Area aligns with the Gateway Core Economic Area, reflecting the significance of this location to the economic vitality of the region and the nation.

The RPG's include a clear Settlement Typology and Hierarchy. The structure of the Hierarchy reflects the strategic importance and growth potential of the region's urban centres, towns and villages. It is also consistent with the population levels anticipated within those towns, as follows:

- Dublin as the Gateway Core, with a population of approximately 1.2 million;
- Metropolitan Consolidation Towns, having a population of up to 100,000 people;
- Large Growth Towns I, up to 50,000;
- Large Growth Towns II which will have populations of 15,000-30,000 respectively;
- Moderate Sustainable Growth Towns, having a population of 5-15,000;
- Small Towns (no population targets specified); and
- Villages (no population targets).

Kilcock is named within the Settlement Hierarchy and Typology as being a 'Moderate Sustainable Growth Town' which it describes as *"strong edge of metropolitan area district service centre, high quality linkages and increased densities at nodes on public transport corridors"*.

Within the RPG's, 'Moderate Sustainable Growth Towns' are recognised as having an interacting and supporting role to their adjacent higher order towns. It is further acknowledged that these towns will also continue to *"have a strong role as commuter locations within the fabric of continued consolidation of the metropolitan area."*

There is no doubt that the settlement of Kilcock continues to serve this significant role in terms of supporting Dublin City as the nation's Gateway Core. It also fulfils the important function of supporting 'Large Growth Towns', including Maynooth and Leixlip which have increasingly important economic functions.

Less than 5km away, Maynooth, designated as a Large Growth Town I in the RPG's Settlement Hierarchy, has emerged as a vibrant economic hub with a range of employment activities based around its tertiary educational institution. In the case of Leixlip, also identified as a Large Growth Town I and only 10km away, it has become the centre of economic activity associated with the rapidly expanding tech sector.

With a population in excess of 6,000, Kilcock comfortably falls within the nominated population targets for a 'Moderate Sustainable Growth Town' and has additional room to expand. It is also noted that the County of Meath has a recorded population of 195,044 (CSO 2016), in line with the growth targets specified in the RPG's. This population target was achieved despite the challenging economic environment which persisted in the years following adoption of the RPG's.

In view of the strong economic recovery of recent years and significant pressures on housing supply, it is likely Kilcock will continue to serve the Dublin Metropolitan Area as an important location for housing given its strategic importance and its proximity to the city centre, as well as other higher order growth towns in the region.

It is therefore recommended that the Settlement Hierarchy is maintained to ensure orderly housing provision in line with the principles of consolidation which were recognised in the RPG's and continue to underpin the more recent National Planning Framework.

MEATH COUNTY DEVELOPMENT PLAN 2013-2019

On the basis of its designation within the RPG's as a 'Moderate Sustainable Growth Town' and its links with the higher order growth towns and Dublin City, Kilcock is identified as a 'District Employment Centre' in the hierarchy of economic centres within the County Development Plan. The connectivity enjoyed by Kilcock with adjoining towns and the Dublin Metropolitan Area has been enhanced by its access to the strategic road and rail network.

The lands are currently zoned "*Objective A2 – To provide for new residential communities with ancillary community facilities, neighbourhood facilities and employment uses as considered appropriate for the status of the centre in the Settlement Hierarchy*" under the Meath County Development Plan 2013-2019.

Within the Development Plan, particular priority has been given to development of the Metropolitan Area, including consolidation of existing settlements and the promotion of development which facilitates the integration of land use and transport.

In accordance with the Development Plan, it is an objective (SS OBJ 2) of Meath County Council:

"To ensure that throughout the county, growth takes place concurrent with the provision of necessary services and infrastructure, including water services. Planning permission shall only be granted where the Planning Authority is satisfied that there is adequate capacity available to serve development."

The subject lands immediately adjoin the existing built up area of Kilcock and are well served by appropriate infrastructure including local roads and water supply. Irish Water have also indicated ample water in this location and so the sites are both appropriate and ready for the delivery of much needed housing for the region, consistent with the strategic principles of consolidation and growth, whilst satisfying local objectives regarding servicing and capacity.

DRAFT REGIONAL SPATIAL AND ECONOMIC STRATEGY

The National Planning Framework (NPF) identified compact growth as a priority for future development in the nation. In addition to the provision of employment, infrastructure and services, it identifies that a key consideration for the Regional Spatial and Economic Strategy in its determination of growth targets for settlements, shall be:

"Particular sub-regional interdependencies, for example, where a settlement may be located in relation to a number of nearby settlements and scope for collaboration and complementarity."

Like a number of the medium to large sized towns in the vicinity of Dublin, Kilcock forms a significant part of the 'sub-regional interdependencies' within the Metropolitan Area. The provision of housing, employment and vital community and social functions in Kilcock, combined with its proximity and connectivity to Dublin City, Maynooth, Leixlip and Celbridge, ensure it remains part of an important, strategic network of settlements that are interdependent.

The location of the subject lands adjacent to the existing developed area of Kilcock mean that their development would be consistent with the principles of consolidation and compact growth that underpin the National Planning Framework.

These principles are also embraced in the draft Regional Spatial and Economic Strategy. The growth enablers for the Dublin Metropolitan Area include the objective:

"To realise ambitious compact development targets of at least 50% of all new homes within or contiguous to the existing built up area in Dublin and at least 30% in other metropolitan settlements."

Clearly then the draft strategy recognises the need for continued, sustainable housing development. In this instance, the sites are contiguous to this existing metropolitan settlement and so satisfy national and regional objectives that promote compact growth. Development of these lands is aligned with the ambitious target of 30% of new homes within or contiguous to the existing metropolitan settlements.

The draft RSES has adopted a different approach to its settlement hierarchy compared to the RPG's and overlooks the important role of towns like Kilcock within the region. The Settlement Typology is as follows:

- Dublin City;
- Regional Growth Centres (Drogheda, Athlone and Dundalk);
- Key Towns (Bray, Maynooth, Swords, Navan, Naas, Wicklow-Rathnew, Graiguecullen (Carlow), Longford, Mullingar, Tullamore and Portlaoise);
- Medium to Large Towns (Not identified within draft RSES, instead to be defined by Local Authorities in their Development Plans);
- Small Towns and Village comprising 1,500 – 5,000 people; as well as
- Rural Villages of less than 1,500 people.

Kilcock is currently a medium sized town well-positioned within the strategic network of interdependent 'Key Towns' in the metropolitan area. The draft RSES presents an opportunity to identify appropriate medium and large towns in the regional context, clarify their role and recognise them as assets within the strategy. This is particularly important because Local Authorities will ultimately rely on regional policy direction to inform their own settlement strategy to be implemented through their development plans.

Kilcock railway station is situated on the Dublin Connolly to Longford commuter service and Dublin to Sligo Intercity Service. It is considered that better recognition of the locality within the strategy could help secure future investment in the local rail network, enhancing the town's connectivity and further solidifying it as a regional asset.

Existing infrastructure and servicing capacity mean that housing can be delivered on the subject lands as a matter of priority. Irish Water have advised that the sites are fully serviced and can meet the water demands associated with future residential development. This is a matter of paramount importance given the problems within the state of inadequate housing supply.

The 'Implementation Roadmap for the National Planning Framework' emphasises that *"strategic location, deliverability, scale, servicing capacity and achievement of outcomes within a regional and metro context should be used to assess strategic site suitability."*

The draft strategy advises that appropriate measures should be put in place during the transition period to manage the development of existing residentially zoned lands. Rather than de-zoning of surplus land, the following prioritisation measures are advocated:

"Accordingly, 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. Proactive land management therefore requires realistic prioritisation, proper monitoring and effective co-ordination across regional, metropolitan, city and county levels."

The existing infrastructure and servicing of the subject lands in Kilcock would ensure that their prioritisation for development is consistent with the approach outlined in the draft RSES.

The transitional population projections contained in the Implementation Roadmap for the NPF for County Meath indicate that it will grow from 195,000 people in 2016 to 216,000-221,000 in 2026 and up to 225,500-231,3000 in 2031. This is a population increase of up to 36,000 over the next 12 years in the county and will represent a substantial challenge to ensure adequate housing supply for the anticipated demand.

It is therefore imperative that developers with a proven track record can be supported to deliver sustainable housing in appropriate locations. In this case, the developer has already substantially commenced a major housing development on an adjoining site, situated to the south-west of the subject lands. Substantial investment has already taken place to provide local roads, flood attenuation measures, water services and parkland to benefit development on these lands. New pedestrian linkages to Kilcock Town and a school are also proposed to accompany future development of the subject sites.

The draft RSES has a vital role to play in enabling Local Authorities to meet the region's future housing needs. The draft strategy should therefore provide more certainty for Local Authorities to respond to the future population growth in a manner that complies with the NPF's sustainability objectives. Continued support for Kilcock, as an existing 'Moderate Sustainable Growth Town' should be expressed in the RSES, in the form of a Settlement Hierarchy that aligns with the tiered approach of the RPG's and recognises the strategic role of such towns within the Dublin Metropolitan Area.

In this instance, the need to identify the Kilcock settlement in the draft RSES is amplified because it straddles the two administrative boundaries of County Kildare and County Meath. Unfortunately its location along the border of these Counties has meant that the Local Authorities, particularly Meath County Council, have been somewhat reluctant to embrace additional growth of the area. This creates significant uncertainty for developers and has the potential to hamper development and additional investment in this strategically significant location.

The role of the EMRA is therefore critical in such as case. There is genuine potential for the future development potential of 'Kilcock and its Environs' to suffer by 'falling between the cracks' of these two Local Authorities. The role of the EMRA for regional oversight is therefore paramount to determining strategic spatial policy at the local level in this part of the region, thereby enabling investor confidence.

CONCLUSION

The importance of the draft RSES as a strategic policy document that underpins the future growth of the region cannot be understated. It will substantially influence the core strategies of Local Authority Development Plans and Local Area Plans throughout the eastern and midland region over the coming decades.

The strategy will also direct how funding is allocated in the region, through implementation of the National Development Plan, the Urban Regeneration and Development Fund and the Rural Regeneration and Development Fund over the next ten years. The RSES will determine priorities for how infrastructure spending is apportioned and those parts of the region that realise their growth potential.

The objective of more sustainable development in the form of more compact towns and urban centres is to be commended. As outlined above, development of the subject lands in Kilcock would be consistent with the NPF goal of achieving 30% of all new housing within or contiguous to the existing built up area (in metropolitan settlements outside Dublin).

The importance of appropriate land management and prioritisation for effective housing delivery has been stressed in both the NPF and the draft RSES documents. The subject lands in Kilcock are well placed and adequately serviced to achieve this vital aim at a time when existing housing supply is under enormous pressure and substantial population growth is anticipated.

Kilcock has a significant role to play in ensuring that the region can respond to the major demands associated with rapid economic growth and meeting future housing need. The Settlement Strategy contained within the draft RSES should therefore adopt a more targeted approach to ensuring these issues can be managed appropriately.

The Settlement Strategy contained within the RPG's appropriately identified 'Moderate Sustainable Growth Towns' within the hierarchy, recognising their strategic importance within the regional network of inter-dependent towns. Medium to large size towns, including Kilcock, should continue to be named within the settlement hierarchy of the forthcoming RSES.

Kilcock is a major asset within the Dublin Metropolitan Area, given its proximity to Dublin city centre and higher order towns of Maynooth, Leixlip and Celbridge. It is a well-established town with high levels of existing economic, community and social infrastructure and benefits from good connectivity in terms of the regional road and rail network.


The future growth of Kilcock should therefore continue to be supported in the upcoming RSES through amendment to the Settlement Strategy, ensuring that it is identified as an appropriate location for continued growth and investment. Otherwise there is a genuine risk that the Kilcock settlement will be side-lined, as a result of its location straddling the two administrative boundaries of County Kildare and County Meath. Recognition within the settlement hierarchy at a regional level is vital to ensuring the appropriate future development of the town, in a manner consistent with the former regional policy approach.

It is the hope of McGarrell Reilly Group that the contents of this submission will be considered and may be used to further inform the draft RSES prior to its adoption. Inclusion of more specific policy provisions that would provide additional tiers in the Settlement Strategy, particularly with respect to settlements formerly identified as 'Moderate Sustainable Growth Towns' is being sought.

The addition of Kilcock within the settlement strategy is considered necessary in recognition of its strategic significance within the Dublin Metropolitan Area and to determine an appropriate level of policy support at the County level.

We thank EMRA for the opportunity to make a submission at this time and would welcome the opportunity to discuss any aspect of this submission in person.

Yours sincerely

A handwritten signature in black ink, appearing to read "Jim Keogan". The signature is fluid and cursive, with a long horizontal stroke at the end.

Jim Keogan
McCutcheon Halley Chartered Planning Consultants

