

## Heather Cooke

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**From:** Student <Student@mhplanning.ie>  
**Sent:** 23 January 2019 16:57  
**To:** RSES  
**Cc:** Jim Keogan; sharon@mcgarrellreilly.ie  
**Subject:** Submission to Draft Regional Spatial and Economic Strategy  
**Attachments:** Stamullen RSES 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 the town of Stamullen in County Meath.

Regards,  
Martina Keenan Rivero  
McCutcheon Halley Chartered Planning Consultants



Eastern and Midland Regional Assembly  
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23 January 2019

**Re: Designation of Stamullen, County Meath, within Settlement Hierarchy in Draft Regional Spatial and Economic Strategy**

Dear Sir/Madam,

## INTRODUCTION

McGarrell Reilly Group welcome the publication of the draft Regional Spatial and Economic Strategy (RSES) 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.

It is understood that the principal statutory purpose of the RSES is to support the implementation of the National Planning Framework (NPF) and the economic policies 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.

The RSES is to be consistent with the NPF, and in turn, Local Authority Development Plans must adhere to the policy direction detailed in the regional strategy, as set out in Figure 1.2 of the draft RSES.

## PURPOSE OF SUBMISSION

The purpose of this submission is to highlight the importance of Stamullen within the regional context and endorse its inclusion in the Settlement Hierarchy and to seek the inclusion of a specific objective in the RSES for a direct road link to the M1 Motorway so as to accord with the existing Meath County Development Plan and enable the town to realise its potential as an economic asset at the regional level.

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It is recommended that the Settlement Typology and Hierarchy within the draft RSES be amended to re-instate the tier of 'Moderate Sustainable Growth Town' which was contained within the Regional Planning Guidelines (RPG's) for the Greater Dublin Area 2010-2022.

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 Stamullen within the region be recognised, by amending the Settlement Strategy within the draft RSES in a manner consistent with the details of this submission.

## **THE REGIONAL IMPORTANCE OF STAMULLEN**

The settlement of Stamullen is located within the Slane Electoral Area, to the north-east of County Meath. It lies to the immediate north of the Fingal administrative boundary which follows the path of the River Delvin. The settlement is situated approximately 13 kilometres to the south of Drogheda and is less than 1 kilometre from the M1 Dublin Belfast Motorway and 2.2 kilometres from the R132 regional route.

There are a wide range of community facilities and social infrastructure within Stamullen. St Patrick's Church and National School, as well as the newer Rainbow National School are located within the town. Additionally, Stamullen is home to St Patrick's GAA club and substantial grounds including 3 playing pitches and an all-weather pitch, community sports complex with attached covered grandstand consisting of community sports hall and changing facilities, community activity and meeting rooms.

The City-North Hotel and Conference Centre in Stamullen boasts 128 rooms and large conference centre. The area also enjoys access to regional transport services provided by Matthews.ie private bus operator which offers bus and coach services in the town and connects it with the larger urban centres of Dublin and Drogheda.

Stamullen also has ample retail services including a supermarket, pub, petrol station, three hairdressers, gent's salon, veterinary clinic, butcher, fast food outlet, laundromat and a coffee shop.

There is in excess of 60 hectares of land zoned for employment generating uses and the town also contains a number of large residential housing estates, particularly to the north and north-east of Stamullen Village.

Stamullen experienced rapid growth during the period from 2002-2011, with an increase in population from 779 to 3,130, representing a rise of 302%. The growth of the village was predominantly as a commuter centre due to its proximity to the Dublin Metropolitan Area and its access to good transport links, including both rail and road networks.

Population growth slowed significantly in the period following, with 2016 census data showing a total population of 3,361 for the settlement of Stamullen (excluding the hinterland which brings the overall population of Stamullen to more than 5,000 people). This slowdown in population growth, being 7.4% for the period 2011-2016, is substantial given the earlier growth levels and coincides with the severe economic downturn experienced in the nation at that time.

The 2016 Census indicates that between 2011-2016 there was a net increase of 8,803 dwellings to the national housing stock, which equates to an increase of 0.4% in the period. At the same time, there was an overall population increase of 173,613 people in the country.

The 2016 Census also revealed that the population of County Meath increased from 184,135 in 2011 to 195,044 in 2016, being an increase of 10,909 people (5.7%). In the same period, the census data shows an increase of 892 new homes completed.

This evidence clearly indicates that since the Meath County Development Plan (MCDP) came into effect on 22<sup>nd</sup> January 2013, an estimated 534 dwellings (178 x 3 years) have been completed against a requirement of 7,800 dwellings (2,600 x 3 years).

These figures reflect a completion rate of 6.8% or shortfall of 7,266 against the housing requirement for this period. This means that the required amount of homes planned for, as set out in the MCDP have not been delivered at the necessary rate to meet the overarching objectives of the plan.

Whilst the recession would have restricted the ability of developers and housebuilders to deliver new housing during the period, it is believed that restrictive regional planning policies have also contributed to the shortfall.

The region is now in the midst of a strong economic recovery, coupled with significant pressures on housing supply. Given the negligible increase in housing stock during the recession, it is now incumbent upon all levels of government to ensure adequate delivery of new housing in a manner that is stable and sustainable.

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 Stamullen to the region be recognised, by amending the Settlement Strategy within the draft RSES to enable Meath County Council to encourage growth of the town through more targeted policy direction in its Development Plan and Local Area Plan.

## PROPOSED CHANGES TO THE DRAFT RSES

In accordance with the Settlement Typology and Hierarchy detailed in the Regional Planning Guidelines (RPG's) for the Greater Dublin Area 2010-2022, Stamullen is designated as a *Small Town*. This designation is replicated within the Meath County Development Plan 2013-2019.

The draft RSES details a number of potential spatial scenarios, identified in Table 3.2 including:

- 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.

The draft RSES (p34) states that the preferred spatial strategy for the eastern and midland region is the pursuit of Option C. This encompasses 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 upon the receiving environment. The strategy identifies 'Key Towns' of Bray, Maynooth, Swords, Navan, Naas, Wicklow-Rathnew, Graiguecullen (Carlow), Longford, Mullingar, Tullamore and Portlaoise.

It is considered that there is a need to review the baseline Settlement Typology outlined in the draft RSES. In section 4.2 of the draft strategy, the following Settlement Typology is identified:

- 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.

The draft RSES nominates the Regional Growth Centres and Key Towns but overlooks lower order settlements, leaving the Local Authority and County Development Plans to identify Medium to Large Towns in the order of 5,000-10,000 people, which have the capacity for continued commensurate growth to become more self-sustaining.

The current RPG's contain a different approach to the Settlement Typology and Hierarchy, 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).

The National Planning Framework (NPF) acknowledges that the Eastern and Midland Region will require an additional 550,000 new homes 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."

The revised County Development Plans will be required to provide adequate zoned lands to respond to housing demand and support a stable housing market. This requires designation of appropriate locations for growth and consolidation at the regional level.

The proposed Settlement Typology and Hierarchy detailed in the draft RSES, represents a significant departure from that which was adopted in the former RPG's. The notable absence of Large Growth Towns I, Large Growth Towns II and Moderate Sustainable Growth Towns is a significant amendment in the regional context. No rationale is provided however, for why this approach to the settlement strategy has been taken and why only settlements exceeding 10,000 people are identified.

Of particular note is the absence in the draft RSES of settlements defined as 'Moderate Sustainable Growth Towns'. The RPG's define these (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."*

In order to positively respond to the NPF objective of delivering 550,000 new homes in the eastern and midland region over the next 20 years, and in the case of County Meath, sufficient number of homes to meet the anticipated additional 36,500 people by 2031, as defined in Appendix B (Strategic Planning Area (SPA) and County Population Tables), the draft RSES should be amended to include an additional settlement tier.

When the population of Stamullen Town and the hinterland of Stamullen are taken into consideration the population exceeds 5,000. This is consistent with the size of 'Moderate Sustainable Growth Towns' as they are described in the RPG's and that of Medium to Large Towns, as defined in the draft RSES and so it believed that Stamullen warrants inclusion in this tier of the Settlement Hierarchy.

This type of Settlement Typology has already been positively planned for in County Meath and would provide greater certainty and direction for the location of future growth within the region, outside Dublin City, Regional Growth Centres and Key Towns.

Greater certainty in respect of this matter, will ensure more timely delivery of housing throughout the region, at a time when the country is gripped by a housing crisis, magnified in the eastern region where demand for housing is greatest.

It is therefore considered that the typology of 'Moderate Sustainable Growth Town' 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 continue to be self-sustaining and supporting a wider rural hinterland.</p>			

**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**

In addition to the above, and for the purpose of being comprehensive, 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.*

It is the contention of Meath County Council, that the settlement of Stamullen is worthy of promotion to a 'Moderate Sustainable Growth Town', as it is currently defined in the RPG's and as we are now proposing by way of amendment to the draft RSES. The MCDP clearly reflects this view in its Core Strategy, where it states:

*"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."*

Strategically, the settlement of Stamullen is significant given its proximity to Dublin and its connectivity in the region. Currently it is identified as a Local Employment Centre serving the wider East Meath area within the MCDP.

The 'Mid East Regional Authority Economic Development Strategy' (2009) and the subsequent RPG's recognised the potential of Stamullen as a future 'Secondary Economic Hub', predicated on the development of a deep-water port in the region. Additionally, the town is well placed to support further clustering of economic activities, building on the existing economic base.

The County Councils of Meath, Fingal and Louth engaged Indecon International Economic Consultants to prepare an 'Economic Development Strategy for the M1 Corridor' for the period 2010-2022 and its conclusions were consistent with this approach, to support the future development of the Stamullen/ Gormanstown area as an employment hub for East Meath.

Elevation of Stamullen within the existing Settlement Hierarchy of the MCDP will require its recognition in the regional context to ensure its future growth potential can be harnessed. As an existing regional asset, the future development potential of Stamullen should be exploited but is set to be unrealised due to its lack of recognition at the regional level.

The absence of explicit expression of the role of Stamullen at the regional level, has adversely impacted recent decisions, thereby limiting economic growth of the settlement. Its location so close to the M1 International Economic Corridor presents a significant opportunity for economic expansion of the town. However its

prospects of capitalising on this potential are severely constrained by lack of recognition at a strategic regional level.

The draft RSES should therefore be amended, as proposed in this submission, to incorporate 'Moderate Sustainable Growth Towns' within the Settlement Hierarchy and including the settlement of Stamullen in that designation. Incorporation of Stamullen within this tier of the Settlement Hierarchy would better reflect the potential of this important regional asset and enable its future development in a manner cognisant of its existing connectivity, proximity to Dublin City, the Regional Growth Centre of Drogheda and the strategic Dublin-Belfast Corridor.

Articulation of the future growth of Stamullen into a Medium to Large Town (or preferably a 'Moderate Sustainable Growth Town' as proposed in this submission) within the forthcoming RSES should also be accompanied by recognition of the need for a direct link road between Stamullen Village and the M1 Motorway. Construction of this proposed link road is also supported at county level in the MCDP and is necessary to ensure that the settlement can capitalise on its connectivity to the M1 International Economic Corridor and fulfil its economic potential in the region.

## **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 importance of appropriate land management and prioritisation for effective housing delivery has been stressed in both the NPF and the draft RSES documents. Stamullen can play a significant role 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.

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. Specific policy provisions which would provide additional tiers in the Settlement Strategy are being sought, particularly the inclusion of Stamullen as a 'Moderate Sustainable Growth Town'.

The addition of Stamullen within the Settlement Strategy is considered essential in recognition of its strategic significance within the region and to determine an appropriate level of policy support at the County level.

The role of Stamullen as an existing Local Employment Centre with significant scope to expand into a regional employment hub is currently inhibited by a notable lack of policy direction at the regional level. Accordingly we recommend that the status of Stamullen in the Settlement Hierarchy of the draft RSES is elevated in recognition of its strategic significance within the region. Explicit expression of a direct road connection between the settlement of Stamullen to the M1 Motorway is further supported to realise this regional objective.

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



**Jim Keogan**  
McCutcheon Halley Chartered Planning Consultants

