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Dear Sir / Madam

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

I would be grateful if you could confirm receipt.

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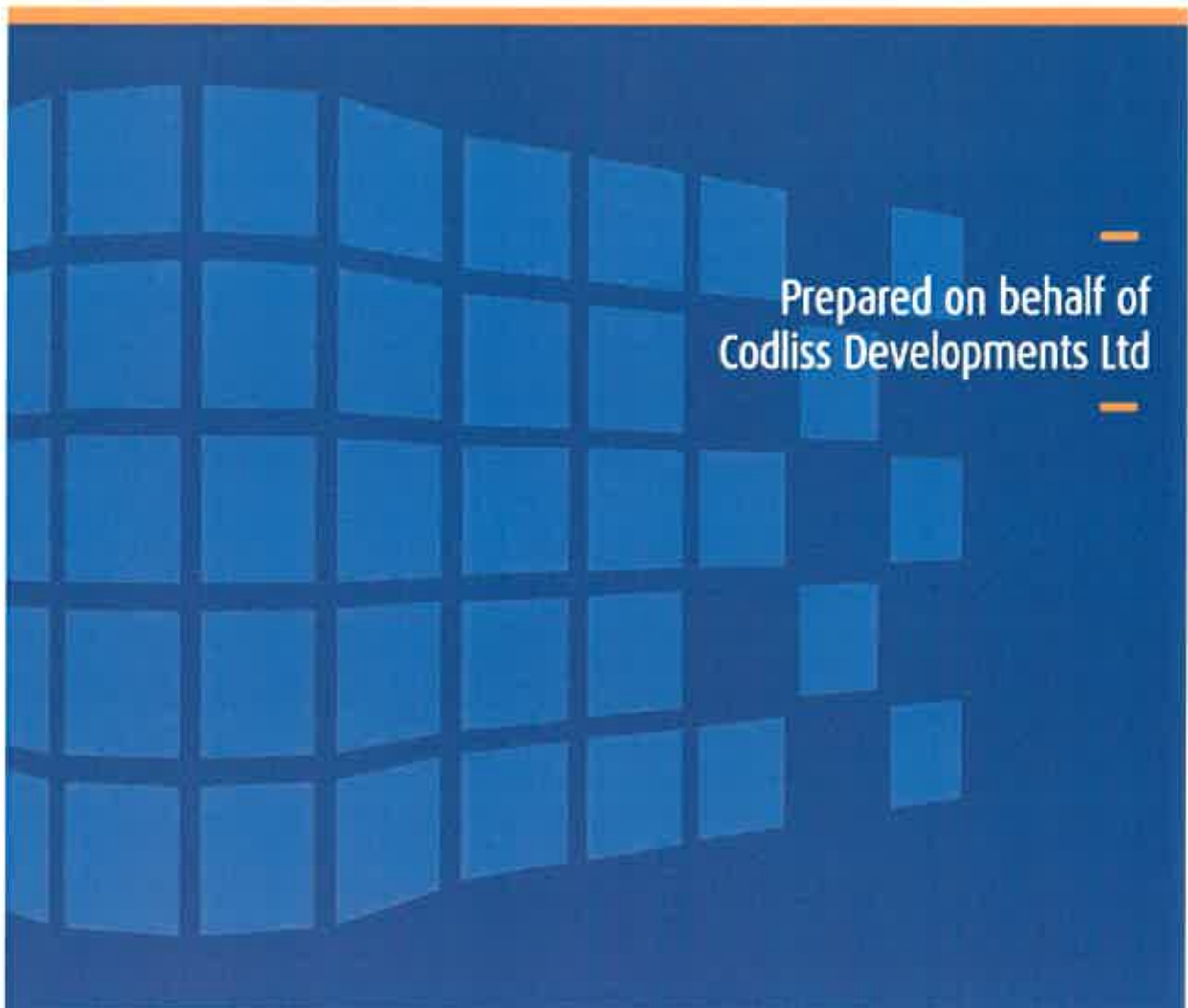
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Response to the Draft Regional Spatial & Economic Strategy for Eastern and Midland Region

Ratoath, County Meath

January 2019



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1.0 Introduction

- 1.1 These representations to the Draft Regional Spatial & Economic Strategy (RSES) for the Eastern and Midland Region have been submitted on behalf of our client, Codliss Developments Limited who have various interests throughout County Meath.
- 1.2 This submission specifically relates to their lands at Ratoath, Co. Meath. 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 Ratoath.
- 1.3 Codliss Developments Limited 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 Codliss Developments 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 and Context

Location and Context

- 2.1 Ratoath is located in the south eastern corner of the county, which acts as a mid point between Dunshaughlin and Ashbourne. It is located 7km to the west of the M3 Parkway Park and Ride.
- 2.2 Ratoath is defined as a “small town” in the MCDP settlement hierarchy. However, with a population of 9,533 (Census 2016), it is the fourth largest town in County Meath, below Navan (30,173), Ashbourne (12,679) and Latown-Bettystown (including Mornington-Donacarne) (11,872).
- 2.3 Ratoath has the highest proportion of its population at work (c. 93.7%), and lowest unemployment (6.3%) of those settlements identified in the Eastern SPA Key Settlements, as defined in the Socio-Economic Evidence Baseline Report (November 2017). Ratoath has strong links with Dublin and the Metropolitan Area, which acts a key destination for the populations workforce.

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. 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 Ratoath.
- 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 settlement of Ratoath 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 Regions key influence by way of employment location) on settlement's and their respective growth remains apparent, with the commuter based settlements in East and Southern Meath (including Ratoath) 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 upto 36,500 people. It is also noted that the NPF Roadmap allows for the potential for upto 25% to the headroom to be added to the 2026 population projection, which is supported by Codliss Developments 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.

Headroom – Support (with recommended changes)

- 3.13 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)

- 3.14 Codliss Developments 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.
- 3.15 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.”*

- 3.16 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.*
- 3.17 *Proactive land management therefore requires realistic prioritisation, proper monitoring and effective co-ordination across regional, metropolitan, city and county levels.”*

Recommended changes

- 3.18 Whilst Codliss Developments 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

- 3.19 Codliss Developments 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. Codliss Developments 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

- 3.20 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

- 3.21 Whilst Codliss Developments 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).
- 3.22 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)

- 3.23 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”

Dublin Metropolitan Area Strategic Plan (MASP) (Section 5) - Objection

- 3.24 It is noted that the boundary of the Dublin Metropolitan Area (DMA) was established in the Regional Planning Guidelines (RPGs) for the Greater Dublin Area (GDA) 2010-2022 and the NTA Strategy for the Greater Dublin Area (GDA) 2016-2035, which has been taken forward in the Draft RSES.

Recommended Changes

- 3.30 Therefore, Codriss Developments Ltd believes this matter should be reviewed following the parameters set out in the NPF. It believes, following this approach, this would lead to Ratoath being included within the revised DMA boundary, given its close proximity and inter-relationship with Dublin, for employment and housing.
- 3.31 This would assist with elevating the status of the settlement, which in turn would allow it to fulfil its function as an economic and residential destination, including the towns jobs to population ration.

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; and
- Amending the DMA boundary to include Ratoath.

4.2 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.

