Simon Musial

From: Aoife O'Connor

Sent: 21 January 2019 12:15

To: RSES

Subject: RSES Submission

Attachments: RSES Submission-MSE Chamber-21.01.2019.pdf

Follow Up Flag: Follow up Flag Status: Flagged

Dear Sir/Madam,

Please see attached submission regarding the Draft Regional Spatial and Economic Strategy.

Many thanks,

Aoife

Aoife O'Connor-Massingham



Eastern & Midland Regional Assembly, 3rd Floor North, Ballymun Civic Centre, Main Street, Ballymun, Dublin, D09 C8P5

21 January 2018

Re: Submission on Draft Regional Spatial and Economic Strategy for the Eastern and Midland Region.

Dear Sir/Madam,

This submission on the Draft Regional Spatial and Economic Strategy for the Eastern and Midland Region (draft RSES) is made on behalf of Meath South East Chamber, 52 Dunboyne Business Park, Dunboyne, Co. Meath.

The Meath South East Chamber promotes South East as an attractive place to invest, do business, and live. Encouraging economic activity in the area benefits the entire community through the provision of employment and services, and quality places to live at locations accessible to employment. The Meath South East Chamber proposes a number of substantive amendments to the draft Regional Spatial and Economic Strategy to stimulate and encourage investment in the South East Meath Economic Corridor, and to minimise the potential for policy to inappropriately suppress or redirect investment to less sustainable locations. Accordingly, it is requested that the draft RSES is amended as follows:

- 1. Include **Ashbourne** and Ratoath in the defined Dublin **Metropolitan Area**.
- 2. Facilitate **reallocation** of Metropolitan Area **population** to **Dunboyne**.
- 3. **Remove** references to **phasing** at **North Dunboyne**.
- 4. **Reference** the strategic role of **South Drogheda** Environs to assist the town growing to **City scale**.
- 5. Reference the strategic importance of the **Maynooth Environs**, and particularly the delivery of **Maynooth Outer Orbital Route**, to achieving the growth objectives for the **Metropolitan Key Town**.
- 6. Include Stamullen as a potential growth settlement in the Dublin Belfast Corridor

7. Include reference to **Dunshaughlin** as a potential **Growth Town** in the Hinterland Area.

1.0 Inclusion of Ashbourne and Ratoath in the Dublin Metropolitan Area

It is requested that the Dublin Metropolitan Area (DMA) as defined in the draft RSES is amended to include the Ashbourne and Ratoath as a synergistic settlement cluster as provided for in previous regional planning guidelines. The inclusion of Ashbourne in the DMA will support the sustainable growth of employment opportunities to rebalance the population and employment ratio, will support the economic future of the town, and will contribute to the sustainable growth and competiveness of the Metropolitan Area.

Ashbourne is located immediately north of the DMA as currently defined, approximately 12 km from the M50 orbital route and within 18 km of Dublin City Centre¹. From a spatial perspective, Ashbourne lies closer to Dublin City than other towns that currently form part of the Metropolitan Area including Kilcock (24 km from the City Centre) and Greystones (23 km from the City Centre). The inclusion of Ashbourne in the DMA, and the satellite town of Ratoath, would therefore accord with the current spatial distribution of the Metropolitan Area.



Figure 1.1 Excerpt from Figure 5.1 of the Draft RSES with the Location of Ashbourne Highlighted.

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¹ The 'Inner City' of Dublin is defined in Map K 'Strategic Development and Regeneration Areas and Key District Centres' of the Dublin City Development Plan 2016-2022.

Ashbourne is located on the M2 within the Dublin-Belfast economic corridor, 10 km from Dublin Airport. In September 2018 it was announced that the Dublin Airport Authority (DAA) intend to invest €900 million on the expansion of the airport to accommodate up to 40 million passengers annually, in addition to the €320 million committed for the provision of a new runway. It is anticipated that economic growth in Ashbourne will occur in parallel with the expansion of Dublin Airport as the town becomes a more attractive location for foreign investment. Given the scale of infrastructural investment proposed, and the potential of the town to support and leverage the sustainable use of these investments, it is logical that Ashbourne, and the adjacent settlement of Ratoath, are included in the DMA for regional planning purposes.

The influence of Dublin City on Ashbourne and Ratoath is evident. Information from the 2016 census indicates that of the 6,142 workers in Ashbourne, 2,486 commute to Dublin City and its immediate suburbs. This represents 40.5% of the working population. Steps have been taken to redress this imbalance through the Economic Development Strategy for County Meath 2014-2022, and in spite of the adverse economic conditions over the past decade Ashbourne has experienced significant growth. Between 2011 and 2016 the population of Ashbourne grew to 12,679, an increase of 11.7%. This was matched by a 36.4% increase in the number of jobs available in the town during this same period. The ongoing expansion of existing employment generating areas in the town, including Ashbourne Business Park, Ashbourne Industrial Estate, and the Ashbourne Business Centre, is critical to the ongoing success of the town.

The growth and urbanisation of Ashbourne is specifically referenced under the Regional Planning Guidelines for the Greater Dublin Area 2010-2022. Section 3.7.5 highlights that growth in the town is influenced by its proximity to the Metropolitan area and Dublin Area, and states that the town is moving towards a more metropolitan character. This has come to fruition as recent information from the Socio-Economic Evidence Baseline Report for the Eastern Strategic Planning Area (SPA) indicates that Ashbourne is functioning as a compact urban entity. As of 2016, Ashbourne has a high population density of 3,845.9 persons per sq km, where the average for the region is just 160 persons per sq km. Ashbourne has a higher population density, and therefore a more compact urban form, than many towns within the Metropolitan Area including Leixlip (3,137.6 persons per km²), Celbridge (3,462 persons per km²), and Maynooth (2,817.6 persons per km²). Ashbourne is also a comparatively young town with 26.2% of the population aged between 0 to 14 years, and a 38.8 % Young Age Dependency Rate. Accordingly, there is potential for continued compact growth of the Town, if such growth is suitably supported by the RSES through its inclusion in the Metropolitan Area.

It is submitted that the inclusion of Ashbourne and Ratoath in the DMA will support the ongoing development of the town, and facilitate continued inward investment. It is therefore requested that the northern boundary of the DMA is amended to include Ashbourne and Ratoath.

2.0 Dunboyne

Amendments are proposed below to ensure that economic and residential development in Dunboyne is supported and facilitated in the draft RSES. These amendments relate to the allocation of population within he metropolitan Area, and a reference to a phasing arrangement for strategically located lands at North Dunboyne on the multi-modal interchange.

2.1 Facilitate Reallocation of Metropolitan Area Population to Dunboyne.

It is proposed that Dunboyne is identified as a Metropolitan Area town that can avail of a transition of

population targets provided for under National Policy Objective 68 of the National Planning Framework. NPO 68 of the National Planning Framework states the following:

"A Metropolitan Area Strategic Plan may enable up to 20% of the phased population growth targeted in the principal city and suburban area, to be accommodated in the wider metropolitan area i.e. outside the city and suburbs or contiguous zoned area, in addition to growth identified for the Metropolitan area. This will be subject to:

- any relocated growth being in the form of compact development, such as infill or a sustainable urban extension;
- any relocated growth being served by high capacity public transport and/or related to significant employment provision; and
- National Policy Objective 9, as set out in Chapter 4". (Emphasis added).

Section 5.6 of the draft RSES states that NPO 68 'shall apply only to the three Metropolitan Key Towns in the MASP namely Bray, Maynooth and Swords, and only if they can demonstrate compact growth on high capacity planned or existing public transport corridors.'

It is proposed that Section 5.6 is amended to include Dunboyne as a town that can avail of additional population growth.

The strategic importance of Dunboyne is well established and supported in current county and regional plans and guidance. The Dunboyne, Clonee & Pace Local Area Plan 2009-2015 (LAP) sets out a framework plan for how the 'corridor' should develop in order to achieve the regional and county level development objectives:

'The combined urban populations of Dunboyne and Clonee was recorded at 6,713 (Dunboyne: 5,713 and Clonee: 1,000) in the 2006 Census. The County Development Plan has indicated that 3,550 households will be allocated to the Corridor over the life of the Development Plan i.e. by 2013. The County Council considers that there is potential to accommodate a further 4,500 households in the 2013-2019 Development Plan period. The medium term population horizon for Dunboyne/Clonee/Pace corridor is **25,000 people.** It is the policy of the Retail Strategy for the Greater Dublin Area that Dunboyne will develop from a Level 3 to a Level 2 centre over a 15 to 20 year timeframe.' [Emphasis added]

The Regional Planning Guidelines for the GDA position Dunboyne to capitalise on the dynamics which have driven massive levels of inward investment in economic development, employment creation, commercial and retail development, community building and infrastructure on the Fingal side of the county boundary and more recently on the Meath side. In this regard, the RPGs state:

'Dunboyne, a large growth town II in the metropolitan area, has yet to realise its long term potential but plays an important role in this economic growth area given its status and location on a developing rail line. It is also located strategically on the edge of the Gateway Core in an area with a high FDI presence. The designation of Dunboyne within the GDA retail hierarchy illustrates the economic potential of the town over a designated time span. This economic growth area experiences high levels of outward commuting patterns to the Dublin area, and it is important that economic stimuli measures are underpinned by necessary infrastructure investment, particularly in relation to water and waste water services'. [Emphasis added]

Dunboyne is now realising its potential with recent significant FDI by Facebook and Shire Pharmaceutical, and Avoca (Aramark), and further significant pipeline development is committed. The presence of a rail link, motorway connectivity to the air and shipping ports, national motorway network and the city centre, and proximity to Maynooth University support significant additional capacity for economic investment and growth. This capacity must be aligned with population growth to support the 'live work' concept embedded in county policy and to redress current imbalances in the wider South East Meath Region between jobs and population.

2.2 Remove Reference to Phasing at North Dunboyne.

Table 5.1 'Strategic Development Corridors, Capacity Infrastructure and Phasing' implies a phasing requirement that is inappropriate and unnecessary and has the potential to adversely affect the potential of Dunboyne to fulfil its regional role within the Metropolitan Area. The Strategy states:

"Sequential development prioritising zoned and serviced lands near the railway station and town centre, followed by development at Dunboyne North at M3 parkway station".

It is requested that this implied phasing arrangement is amended as follows:

"Sequential development prioritising zoned and serviced lands near the railway station and town centre, and followed by development at Dunboyne North at M3 parkway station".

Significant growth has been facilitated in Dunboyne through Variation no. 3 of the Meath County Development Plan. This variation aligned the County Plan with the Economic Development Strategy for County Meath 2014-2022, and provided for the creation of a sustainable 'live-work' community in Dunboyne North to redress unsustainable levels of outward commuting². The County Development Plan provides a plan-led approach for significant employment generating development including a science and high technology park, logistics, warehousing, education, high end offices and a neighbourhood retail centre. Residential development is to be integrated with employment generating uses such that Dunboyne North will be self-sustaining, and an attractive place to both live and invest.

Dunboyne North has the distinction of being located at a multimodal location with a rail station, park and ride, bus facilities, and motorway interchange. The area is adjacent and highly accessible to the established urban area, with significant potential for commercial, employment generation and population growth to complement the town centre and support the wider region. The recent investments by Shire, Avoca and Facebook now establish Dunboyne North as an opportunity site, centred on a multi-modal interchange. It is submitted that proposed amendments to the draft RSES will support the continued sustainable growth of the Metropolitan Area growth town.

3.0 Strategic Role of South Drogheda Environs to Assist the Town Growing to City scale.

It is proposed that the draft RSES is amended to reference the strategic role that the South Drogheda Environs will play as a suitable location for sustainable economic and population growth.

Drogheda is designated as a Regional Growth Centre which will grow to City Scale. It is prioritised for

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² As of 2016, 74.9% of the working population of Dunboyne was commuting outside of the county for employment.

development under the draft RSES, located on the Dublin-Belfast corridor, and identified as one of three Regional Growth Centres capable of driving development in the region. Regional Policy Objective 4.8 states that a Joint Urban Area Plan (UAP) prepared by Louth County Council and Meath County Council will be required to provide a coordinated planning framework for Drogheda.

RPO 4.11 of the draft RSES seeks to promote economic and employment generating development to redress existing imbalances and unsustainable commuting patterns.

RPO 4.8 refers to specific development areas in the town, including the Westgate area, the lands at McBride Station and environs, and lands at Mell/North Road. It is proposed that RPO 4.8 is amended to make specific reference to the Southern Environs of Drogheda and the potential for these lands to accommodate compact and sustainable development.

Under the draft RSES, the population of Drogheda is to grow to 50,000 by 2031, an increase of c.9,000. While 30% of growth is directed to the urban core, approximately 70% will be accommodated in other locations. It is considered that the urban infill and brownfield areas currently listed in RPO 4.8 may not be capable of accommodating the quantum of development required in the short term, and the balance of units required may not be accommodated solely the McBride Station and environs.

It is submitted that the Southern Environs of Drogheda can accommodate a sustainable and appropriate proportion of allocated employment and residential development. Development in the Southern Environs is guided by the Local Area Plan for the Southern Environs of Drogheda, 2009-2015. The southern environs accommodate approximately 120 hectares of undeveloped lands zoned for commercial and employment generating uses. This significant economic development landbank is supported by residential areas, open spaces and areas designated for the provision of community, social and educational facilities.

LAND USE ZONING OBJECTIVES

A1 To protect and enhance the amenity of developed residential communities.

To provide for new residential communities with ancillary completing times as considered appropriate for the status of the centre in the Settlement Hierarchy.

B2 To provide for the development of a retail warehouse park.

C1 To provide for the development of a retail warehouse park.

E2

H1 WL

Figure 3.1 Excerpt from Map 5.3 Land Use Zoning Map of the Southern Environs of Drogheda Local Area Plan

Drogheda and its southern environs benefit from multi-modal transportation links including high capacity road and rail infrastructure. The train station is on the southern side of the River Boyne, in close proximity to the Southern Environs, and this area of the town is served by Bus Eireann Routes 101 and 101X. The M1 motorway defines the western edge of the southern environs area, with exits 8 and 9 directly serving the LAP

area.

The Southern Environs of Drogheda is capable of accommodating significant development in order that Drogheda may grow as required under the draft RSES. It is therefore requested that RPO 4.8 is amended to include reference to the lands of the Southern Environs to secure the sustainable development of this area.

4.0 Strategic Importance of the Maynooth Environs

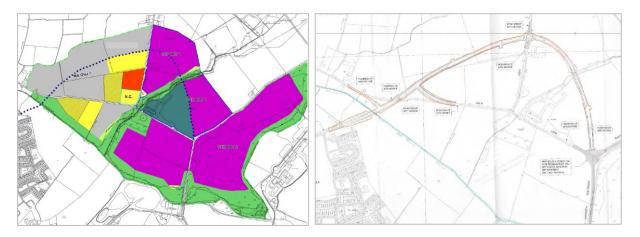
It is proposed that the draft RSES appropriately references the strategic importance of the Maynooth Environs, and particularly the delivery of Maynooth Outer Orbital Route, to achieving the growth objectives for the Metropolitan Key Town. In this regard, it is proposed that Section 4.6 and Table 5.1 of the draft RSES is amended to include reference to the Maynooth Environs and a critical section of the proposed Maynooth Outer Orbital Road.

The draft RSES refers to the strategic importance of Maynooth as a Key Town and self-sustaining settlement in the DMA. It is stated that Key Towns have the capacity to accommodate 'above average' growth in the Region. Section 4.6 lists development areas of the town comprising: the Railpark lands in the southeast of the town, Crewhill in the northwest, and Newtown in the southwest. In respect of employment generating development, Table 5.1 'Strategic Development Corridors, Capacity Infrastructure and Phasing' makes reference to just the research & technology park adjoining Maynooth University.

It is proposed that the draft RSES references the Maynooth Environs lands to the north of the within County Meath given their strategic importance to the sustainable development of the town. Development of these lands will deliver a strategic element of the proposed Maynooth Outer Orbital Road (MOOR) and represent a sustainable location for the sequential expansion of established employment and residential areas.

The Meath County Development Plan provides a plan-led framework for sustainable urban expansion in the Maynooth Environs. The Plan allocates 63 hectares for strategic employment and high technology uses, identified in pink in Figure 4.1, and c.7 hectares is zoned for Tourism uses, identified in teal in Figure 4.1. These uses are to be supported by a neighbourhood centre, a modest residential population and active open spaces. The indicative route of the proposed Maynooth Outer Orbital Relief road is shown as a dotted blue line.

Figure 4.1 Excerpt from Maynooth Land Use Zoning Objectives Map of the Meath County Development Plan 2013-2019, and the Approved Route of the MOOR.



This section of the Maynooth Outer Orbital Relief road which constitutes an element of a strategic orbital route for the entire town was the subject of a recent Part 8 approval, and by Resolution of the Council dated 12 October 2016, Meath County Council decided to proceed with the construction of the 1.7 km section of road. It is stated in the Planner's Report for the scheme that the road network in Maynooth Environs requires significant upgrading to safely accommodate both current and future traffic levels. It is noted that the consented Outer Orbital Road is also critical to the development of the strategic employment, tourism and leisure facilities proposed for the Maynooth Environs.

It is submitted that Maynooth Environs have the capacity to facilitate the growth of Maynooth and provide much needed road infrastructure. Therefore, it is requested that Section 4.6 and Table 5.1 of the draft RSES is amended to include reference to the development lands in Maynooth Environs and the Maynooth Outer Orbital Road, as proposed.

5.0 Inclusion of Stamullen as a Settlement in the Dublin – Belfast Corridor

It is requested that Section 3.2 of the draft RSES is amended to make reference to Stamullen as a settlement in the Dublin-Belfast Corridor, to emphasise the strategic location of the town and its ability to accommodate growth.

The draft RSES states that the Dublin to Belfast Corridor is the largest economic agglomeration in Ireland, supported by a large population and national entry points by air and sea. Development along the Dublin-Belfast Corridor is prioritised, and two of the three designated Regional Growth Centres are located on the corridor. The Growth Strategy of the draft RSES states the following in respect of the Dublin-Belfast Corridor;

"Promote economic growth and improved connections between Dublin and Belfast and support cross border networks to drive synergy in services and functions".

It is noted, that the settlement of Stamullen is not mentioned in the text of the draft RSES, despite its strategic location on the Dublin-Belfast corridor and the potential of the town to accommodate economic and population growth. Stamullen benefits from being located at the M1 Motorway, in close proximity to Dublin City, Dublin Airport, and ports at Dublin and Drogheda. The town avails of bus linkages to Balbriggan Train Station via routes 191 and 192.

The potential for sustainable growth in Stamullen is recognised in the Meath County Development Plan. While Stamullen was designated as a Small Town in the Settlement Hierarchy of the County, it is stated that the town will grow to Moderate Sustainable Growth Town status. Section 3.4 'County Meath Settlement Strategy' of the Plan states the following;

"Meath County Council will seek to advance the Settlement Status of both Enfield and Stamullen from Small Towns to Moderate Sustainable Growth Towns through the new Eastern & Midland Regional Assembly having regard to their important locational advantages on the M4 and M1 Economic Corridors respectively in the Greater Dublin Area".

There is 32.9 hectares of employment zoned land in Stamullen. These lands form part of the City North Business Campus, which currently accommodates several domestic and foreign businesses. Despite having direct linkages to the M1 Motorway between Dublin and Belfast, Stamullen has yet to realise it potential for significant employment generating development as shown in the Meath County Development Plan.

Appendix 2 of the National Planning Framework states that Stamullen is experiencing an unsustainable imbalance between the total number of jobs available in the town, and the number of resident workers. In 2016 there were just 425 no. jobs for the 1,497 no. resident workers, meaning that 72% of the population commute outside the town for work. In addition, the Census of 2016 revealed that Stamullen has a very young population, with the Young Age Dependency Rate of 54.8%. It is therefore imperative that economic development and employment generating uses are facilitated in the town to enable these young people to live and work in the area.

It is evident that Stamullen has potential to accommodate commercial development at a scale that could address the existing issues of outward commuting in the town and the region. The existing City North Business Park provides opportunities for those wishing to invest in the area, which will support the development on the Dublin to Belfast Corridor in accordance with the draft RSES. It is therefore requested that Section 3.2 on the Dublin to Belfast Corridor is amended to include reference to Stamullen.

6.0 Dunshaughlin as a potential Growth Town

It is requested that the RSES includes reference to Dunshaughlin's potential to develop as a Growth Town in the Hinterland Area to facilitate sustainable development along the M3 transport corridor and proximate to the rail line at North Dunboyne. Dunshaughlin can support the sustainable development of Meath and the consolidation of towns in the county while providing opportunities for further economic development based on its location and existing infrastructure capacity. The success of the growth of Dunshaughlin would be supported by reference to its potential and capacity in the RSES.

7.0 Conclusion

This submission requests that the draft RSES is amended to support the economic growth and sustainable development of Ashbourne, Dunboyne, South Drogheda Environs, Maynooth Environs, and Stamullen. The amendments proposed are supported by the following relevant planning and sustainable development considerations:

- Ashbourne and Ratoath are located to the immediate north of the DMA and due to their proximity to the City are heavily influenced by Dublin. The towns are in close proximity to Dublin Airport and have capacity to accommodate economic and commercial growth arising from planned expansion of the National Airport. The towns have experienced significant population and economic growth in the past 5 years, with the population of Ashbourne increasing by 11.7% and the number of jobs available in the town increasing by 36.4% in this period. This expansion is being provided in the compact form, such that Ashbourne has a higher population density than most of the towns currently in the DMA. It is therefore appropriate the Ashbourne and Ratoath are included in the DMA.
- Dunboyne has potential to accommodate significant growth, including significant employment generating uses and a live work community at Dunboyne North. Dunboyne North is strategically located on a multimodal location with a rail station, park and ride, bus facilities, and motorway interchange. The area has experienced and benefited from significant recent FDI creating confidence for further inward

investment. The proposed amendments will support the ongoing sustainable growth of this metropolitan growth town.

- Drogheda is designated as a Regional Growth Centre that will act as a driver to growth in the Dublin to Belfast economic corridor and the region, and will grow City scale. The Southern Environs of Drogheda have capacity to contribute to the sustainable growth of employment and residential development in the town as it transitions to city scale. The area benefits from multi-modal transportation links including high capacity road, bus routes and rail infrastructure. There is c.120 hectares of undeveloped commercial lands in the Southern Environs with supporting areas zoned for residential development, open spaces and community, social and educational facilities. It is requested that RPO 4.8 is amended to include the Southern Environs area.
- Maynooth forms part of the DMA and is designated as a Key Town that is capable of accommodating 'above average growth'. The Maynooth Environs have potential to accommodate sustainable growth. Under the County Plan the area has 63 ha of high technology and strategic employment lands and circa 7 hectares zoned for Tourism uses supported by neighbourhood centre, corresponding residential lands and active open spaces. The approved Maynooth Outer Orbital Relief road traverses the Maynooth Environs and is performs a strategic function for the town. The Maynooth Environs has the capacity to contribute to the sustainable growth of the Key Town and as such it is requested that Section 4.6 is amended as proposed.
- The Dublin to Belfast Corridor is recognised as a driver for growth under the draft RSES. The Corridor holds two Cities and two Regional Growth Centres linked by multimodal transport infrastructure. Stamullen is located on the Dublin to Belfast Corridor and benefits from proximity to national entry points at Dublin Airport, Dublin Port and Drogheda, and public transport linkages to the Dublin-Belfast railway. There is 33 ha of zoned employment land in the active City North Business Campus that can contribute to the sustainable economic growth in the Dublin to Belfast Corridor in accordance with the draft RSES. It is therefore requested that Section 3.2 on the Dublin to Belfast Corridor is amended to include reference to Stamullen.
- Dunshaughlin's potential to develop as a Growth Town in the Hinterland Area to facilitate sustainable
 development along the M3 transport corridor, and leveraging its potential based on its location and
 existing infrastructure capacity would be supported by reference to its potential as a Growth Town in the
 RSES.

I trust that the Assembly will afford due regard to the points and issues raised in this submission.

Yours faithfully,

Declan Brassil

Declan Brassil & Co.