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Eastern & Midland Regional Assembly,
3rd Floor North,
Ballymun Civic Centre,
Main Street,
Ballymun, Dublin, D09 C8P5
rses@emra.ie

Date: 12th April 2019

JSA Ref. 17105

Dear Sir/Madam,

RE: DRAFT REGIONAL, ECONOMIC AND SPATIAL STRATEGY – EAST & MIDLANDS AREA – PROPOSED MATERIAL AMENDMENTS

1.0 INTRODUCTION

- 1.1 We refer to the publication of the material amendments to the Draft Regional Spatial and Economic Strategy (Draft RSES) for the Eastern and Midland region on the 15th of March 2019. Glenveagh Properties PLC, [REDACTED] [REDACTED] has instructed John Spain Associates to prepare this submission on their behalf, in relation to the material amendments.
- 1.2 In summary, our client is supportive of the new and amended RPOs which should be confirmed and strengthened where appropriate to guide development in the East and Midlands region and achieve implementation of Project Ireland 2040 objectives.
- 1.3 This submission is focused on supporting specific RPOs included in the material amendments and includes a single minor amendment for the adopted RSES for the Eastern and Midland region.

Managing Director: John P. Spain BBS MRUP MRICS ASCS MRTPI MIPI
Executive Directors: Paul Turley BA MRUP Dip Environmental & Planning Law MIPI Rory Kunz BA (MOD) MScERM MAT&CP Dip EIA Mgmt. MIPI,
Stephen Blair BA (Mod) MRUP MIPI Mary Mac Mahon MSc TCP Pg Dip MSP Pg Dip Env Eng Dip Env Plg Law Dip Mgmt Dip EIA & SEA B Soc Sc MIPI

Associate Directors: Stephanie Byrne BA MRUP MIPI, Niall Byrne BSc(Hons) M.Sc MRTPI MIPI

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2.0 GROUNDS OF SUBMISSION TO MATERIAL AMENDMENTS

- 2.1 Glenveagh is supportive of the material amendments and this submission is focussed on the technical aspects of the proposed RPOs, where we suggest a small change which will assist Planning Authorities in achieving the overall objective.
- 2.2 Glenveagh Properties PLC is a leading Irish homebuilder and is committed to delivering high quality homes – including starter/ down-size homes as well as mid-size and executive houses and apartments – designed to meet housing need in areas of high demand.

2.1 Chapter 3 Growth Strategy

- 2.3 Our client welcomes the addition of new growth enablers for the region and in particular the recognition that the key towns have the capacity to deliver sustainable compact growth for their catchments in tandem with enabling public transport, infrastructure and services.
- 2.4 Section 4.6 of the draft RSES states that the characteristics of ‘key towns’ is that they have undergone relatively sustainable levels of growth in recent decades, where the ratio of jobs to resident workforce has remained high due to a more sustainable balance of employment and population. These growth settlements have the capacity and future growth potential to accommodate above average growth, with commensurate employment growth on high quality public transport corridors aligned with requisite investment in services, amenities and sustainable transport.
- 2.5 It is important that key towns are not artificially constrained in respect of population growth particularly where there has been already been significant private and public investment in infrastructure, within the key towns.

2.2 Taking Account of Existing Plans

- 2.6 Glenveagh note the acknowledgment in the Draft RSES that the zoning of land and planning permission alone, do not necessarily guarantee delivery and population growth in accordance with projected, targeted timeframes. Our client welcomes the various land activations/ prioritisation measures outlined in the Draft RSES. With reference to the proposed amendment to Section 4.3, our client is seeking additional text to reinforce the delivery of housing.
- 2.7 In this regard our client is seeking a minor amendment to section 4.3 as follows (additional text in green):-

*“Core Strategies should apply prioritisation measures rather than de-zoning of land where a surplus of lands is identified in existing plans with regard to the NPF Implementation Roadmap up to 2031. In preparing Core Strategies account should also be given to the consideration of sequential lands which are suitable for the delivery of housing but may not be forthcoming in the Plan period having regard to 2031 Roadmap targets, subject to proper planning and sustainable development. **Where sites are serviced, and in proximity to relevant amenities (social, retail), then there should not be an undue constraint on the capability of such sites delivering housing, in the short-term.”***

2.5 New and Amended RPOs

- 2.8 Glenveagh support the inclusion of additional RPOs as set out in the material amendments for the key towns and the following is outlined:-

Navan

- 2.9 Our client welcomes the amended RPO 4.9 in relation to Navan as the delivery of key infrastructure will support the development of housing and employment in the key town of Navan.

40. Amend RPO 4.29 – Navan

Support the delivery of a network of distributor roads and bridges to release strategic residential and employment lands for development and improve connectivity and the efficient movement of people and services in the town.

- 2.10 Navan is identified as a 'key town' which are noted in table 4.1 of the RSES as "Large economically active service and/or county towns that provide employment for their surrounding areas and with high-quality transport links and the capacity to act as growth drivers to complement the Regional Growth Centres."
- 2.11 Glenveagh recognise the inherent need for new homes in County Meath. Such development should be brought forward at sustainable locations which are accessible to local services and transport links, as well as being associated with existing residential areas and nearby infrastructure which has capacity to support new development.

Naas

- 2.12 Our client welcomes the new RPO (Ref. 46) and amended RPO 4.34 in relation to Naas which supports the permeability and links between the town centre and Sallins train station for Naas which seeks an enhanced role and function for Naas at the County town of Kildare, particularly as a hub for high-quality employment, residential and amenities.
- 2.13 The applicability of NPF Objective no. 9 should be emphasised as being appropriate for Naas, having regard to its status as the County town of Kildare, and also to the already existing significant investment in infrastructure (roads and wastewater), which could deliver housing in Naas. The enhanced connectivity to Sallins train station, through the Northwest Quadrant to the town centre will deliver upon the investments in the interchange and the desire to create green links between the town centre and Sallins train station.
- 2.14 The lands at the Northwest Quadrant are located adjacent to a significant investment and upgrade to the road network (including an interchange) which will facilitate access to Sallins train station. The subject lands are located adjacent to an emerging mixed-use area (including education use) and also are serviced.
- 2.15 There is a recognised need in the National Planning Frameworks (NPF) to align investment in infrastructure, with housing and employment in appropriately located key towns. It is considered that Naas as the County town of Kildare, is strategically located to assist in providing for future population and housing growth in a sustainable manner. Naas is capable of accommodating a significant increase in population and is well located in terms of employment as well as services and public transport links.

Maynooth

- 2.16 Our client supports the new RPO for Maynooth (Ref. 32) which recognises Maynooth as a key town for the north of Kildare.
- 2.17 Metropolitan Key Towns such as Maynooth are identified in the RSES as large economically active county towns, with high quality transport links that play an important service role for their catchments and that have the capacity to act as growth drivers to complement Dublin and the Regional Growth Centres.
- 2.18 Maynooth is identified as a location which has the capacity and future growth potential to accommodate above average growth in the Region with the requisite investment in employment creation, services, amenities and sustainable transport. Indeed, the town has capacity in the west to further develop and consolidate the Metropolitan key town.
- 2.19 The Dublin Metropolitan Area includes the continuous built up city area and includes Maynooth which has strong connections and synergy with the city in a polycentric metropolitan area.
- 2.20 In addition our client is in favour of the new RPO (Ref. 34) which promotes the consolidation of the town centre with a focus on the regeneration of the underused buildings and strategic sites. In particular our client supports the establishment of residential uses to encourage vibrancy within the town centre and the enhancement of the public realm.
- 2.21 Our client also supports the amended RPO 4.27 and the desire to promote the development of Maynooth and the road linkages of the Maynooth Outer Orbital Route, which supports future population growth within the town.

Phasing/Enabling Infrastructure for MASP – North West Corridor

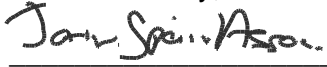
- 2.22 Our client supports the proposed changes to Table 5.1 (Enabling Infrastructure) – which promotes the Dart Expansion in the short to medium term for Maynooth and also the *“Sequential development prioritising zoned and serviced lands near the railway station and town centre and at Dunboyne North at M3 Parkway station”*
- 2.23 It is also noted that the material amendments confirm the intention to implement the extension of the Dunboyne/M3 Parkway line to Navan during the Mid Term Review of the GDA Transport Strategy, which our client supports. The development of housing at locations with access to rail stations offers a sustainable approach to the development of housing within the region.

3.0 CONCLUSIONS

- 3.1 Glenveagh as an owner in the above areas has an ongoing commitment, combined with the necessary resourcing, to delivering affordable housing in key accessible, serviced locations.
- 3.2 We respectfully request the Eastern Regional Authority takes this submission into account and to adopt the proposed alterations (with amendments) into the adopted Regional Spatial Strategy for the East and Midlands Regional Authority.

- 3.3 These will provide Planning Authorities with appropriate flexibility to deliver, and not unnecessarily stymie development where relevant supporting infrastructure can be provided in the short-term.

Yours Faithfully,



John Spain Associates