





Description:

**Submission on Draft National Planning Framework – Ireland 2040**

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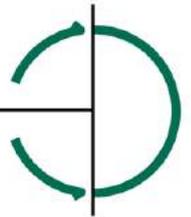
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**Department of Housing, Planning, Community and Local Government**

**Kilbride Estates Ltd.**



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## 1 INTRODUCTION

### 1.1 Introduction

1.1.1 In February 2017 the Department of Housing, Planning, Community and Local Government published the Issues Paper for the National Planning Framework – Ireland 2040 and invited submissions or observations on the proposed policy document.

1.1.2 Kilbride Estates Ltd. has assembled a professional multi-disciplinary team to advise them in relation to the proposed new policy document, and to make a submission on its behalf.

1.1.3 The proposal to replace the existing National Spatial Strategy (NSS) is broadly welcomed by our client. In particular, the NSS failed to deliver balanced economic and population growth throughout the state and its replacement is long overdue. Indeed the NSS (2002) was overly prescriptive and not sufficiently flexible to ensure that the planning process could respond in a timely fashion to changes in population growth, employment growth and economic circumstances, but instead was restricted to the confines of the NSS in terms of where housing and jobs were to be located. This confined many planning authorities to not even be allowed to consider otherwise worthwhile and sustainable development proposals that were not strictly in conformity with the NSS. The National Planning Framework (NPF) should learn from the NSS shortcomings and allows sustainable development in appropriate location to be brought forward in a timely fashion.

### 1.2 Minister's Foreword – Ireland 2040 National Planning Framework

1.2.1 The scale of the challenge for the NPF is succinctly summarised by the Minister in his Foreword, which states:

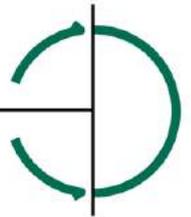
**“A continuation of ‘business as usual’ will not deliver the national vision and goals we all share, such as improved living standards, a desire for people to live in safe, vibrant communities and to experience life-long health and well-being. Nor will we develop the capacity to meet our environmental obligations or be able to respond to climate change.”**

1.2.2 Clearly we must abandon the “Business As Usual” concept in the new NPF if we are to deliver sustainable new communities in the correct locations that meet the housing, wellbeing and environmental challenges that we as a nation have committed ourselves to achieve.

### 1.3 Wider Context

1.3.1 The wider context of the NPF is worth reiterating in this context. This includes:

- Need to tackle the National Housing Emergency
- Need to meet our Paris 2015 CO2 emission targets
- Take national action on World Health Organisation (WHO) forecast of over 80% clinical obesity in Ireland by 2030
- Build sustainable new communities for all age cohorts and socio-economic groups
- Reduce time spent travelling, thereby increasing community participation
- Create increased opportunities for exercise and leisure pursuits and encourage greater community participation by local residents



**1.4 Process of Delivery – Required changes to be included in NPF**

1.4.1 The planned hierarchical approach as set out in the consultation document proposes a long drawn sequential approach that quite frankly will take years to set in place. Even assuming a NPF adoption later in 2017 it would take several years for the approach to be fed into Regional Strategies, County Development Plans (CDP) and Local Area Plans (LAP). The hierarchical structure proposed in the consultation document is shown in Figure 1.1.



**Figure 1.1: Ireland’s Planning Hierarchy Post 2016**

1.4.2 Given that some CDPs have recently been adopted or are currently under preparation this means that the NPF may not be effective on the ground for many years due to the fact that RSEs must be prepared post the adoption of NPF and the CDPs and LAPs would then have to be varied

1.4.3 Therefore, we are proposing that the NPF would also allow for a mechanism through an appropriate revision to the 7<sup>th</sup> Schedule of the Planning and Development Act to allow new sustainable developments that provides for sustainable new communities to be brought forward in the immediate future.

**1.5 Proposed Amendment to NPF**

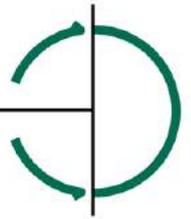
1.5.1 The Housing Crisis facing the Republic of Ireland at this time demands a root and branch reform of its Strategic Planning & Development processes and time-schedules which cannot deliver the essential national housing infrastructure in a timely or satisfactory manner to meet the pressing need.



- 1.5.2 This crisis, however, also offers a unique national opportunity to simultaneously address two other major imperatives of public policy – Climate Change and the Health of the Nation- and integrate both of those imperatives seamlessly into the national housing programme, delivering enormous extra value and benefits to all new communities, now and in the future. Building sustainable communities, rather than mere housing schemes, must be our national priority, and new categories of planning must be evolved, outside the compartmentalised structures and strictures used to date.
- 1.5.3 From having a housing surplus back in 2011, Ireland now faces a national housing emergency. Our present population of 4.6 million is set to rise to 5.2million in 15 year's time, and the population of the Greater Dublin Area (GDA) will grow up 400,000 to 2.2 million, representing 42.4% of the national population. Employment in Ireland exceeded 2 million in August 2016, and a handy rule-of-thumb is that we need 1 home per 1 person employed. Nowhere is the housing challenge more apparent than in the Greater Dublin Area (GDA). Each month 2,000 new households are being formed, but housing completions in the GDA averaged only 382 per month in 2015 and 524 per month in 2016.
- 1.5.4 At the same time housing commencements in the GDA were 449 per month in 2015 and 656 in 2016. All of these figures demonstrate that despite an increase in supply and starts the gap between housing demand and supply increases every single month. Three inter-related factors add considerably to the present challenge: sufficient houses are not being built where people want to live; 20% of homes are now rented but rents are rising by 10% annually and are now higher than at the market peak; and the Central Bank insists that purchasers must have a deposit of €45,000 - €50,000 before they are granted a mortgage.
- 1.5.5 There are 140,000 (<http://www.irishtimes.com/news/environment/housing-waiting-list-rules-to-be-radically-overhauled-1.2753415>) on the social housing list nationally, with 5,000 people living in emergency accommodation, and there was an increase of 93% in homelessness in 2015, with €46 million a year being spent on hotels for homeless people. Ireland needs to build an average of 25,000 houses per annum including 5,000 social units, but the present system is failing to meet even half of that.
- 1.5.6 It is obvious to everyone involved in the provision of housing in Ireland that major innovations must be put in place in every facet of that provision to kick-start a constant annual supply of 25,000 homes. We have worked long and hard with Planning expert Michael O'Donnell to create an appropriate Planning and Development amendment which will facilitate the establishment of large sustainable communities based on renewable energy, smart technologies, and the health and well-being of the age-integrated community.
- 1.6 Proposed Amendment to the 7th Schedule: Planning & Development Act for inclusion in the NPF**
- 1.6.1 We suggest a category which might be included in the Seventh Schedule of the Planning & Development Act under the heading of social/economic infrastructure which could read as follows:
- “The development of an integrated, sustainable residential development which will make appropriate provision for community, social, educational and recreational facilities, together with sustainable energy and transport systems, as part of an integrated master plan on an area of land which shall not be less than 10 hectares, and where the number of houses shall not be less than 500, which complies with the above criteria.”**
- 1.6.2 This amendment would provide for a category of development that could be facilitated all over Ireland, notwithstanding their present zoning status, which would be in accordance with best planning principles, based on the best European planning models available.



- 1.6.3 It provides a template to provide for integrated and sustainable development, meeting energy and transport requirements and provides a fast track solution to Ireland's urgent housing crisis.
- 1.6.4 The proposed Seventh Schedule amendment is similar to the 'Fast Track' planning proposal contained in the Planning and Development and Residential Tenancies Bill 2016 where planning applications for residential development of more than 100 houses would be submitted directly to An Bord Pleanála, but the above proposal would be a permanent mechanism to facilitate the reduction in the timeframe for delivery of major residential projects throughout the country.



## 2 IRELAND – THE POPULATION GROWTH CHALLENGE

### 2.1 Introduction

2.1.1 We have undertaken a review of Central Statistics Office (CSO) population forecasts going back several years, which reveals that the CSO forecasts have consistently underestimated Ireland's population growth. This has in part resulted in the current housing crisis, particularly in the GDA as policy documents have been driven and land use zoning has been determined in the main by these CSO forecasts. As CSO forecasts are used extensively to underpin policy formulation it is worth reviewing past forecasts to demonstrate the reliability of the CSO forecasts versus actual population outcomes.

### 2.2 CSO Forecast for 2016 – V – 2016 Actual

2.2.1 In 2011 the CSO made forecasts for the population of the state for 2016.

- The 2016 preliminary CSO Census revealed the population circa. 4.76m for April 2016.
- The CSO forecast for 2011 to 2016 was for a population increase of 98k population in that period
- The actual population growth was a population increase of 183k, meaning the CSO underestimated population growth by almost 85k. Much of this underestimation occurred in the GDA, which in part explains the current housing crisis in the region.

### 2.3 Review of earlier CSO Forecasts

2.3.1 We have also looked back at earlier CSO data. In 1986 the CSO produced a range of forecast for both 2002 and 2011. Using the CSO mid range forecast, Figure 2.1 shows how that in 1986 our population forecast for 2002 were over 400,000 below actual and this figure grew to a disparity of over 1,000,000 by 2011. While forecasting is by its nature not precise this shows the danger of adopting long range CSO forecasts as the sole basis for long term planning. Also this demonstrates that margin of error in population can be extremely large particularly when done over a long timescale.

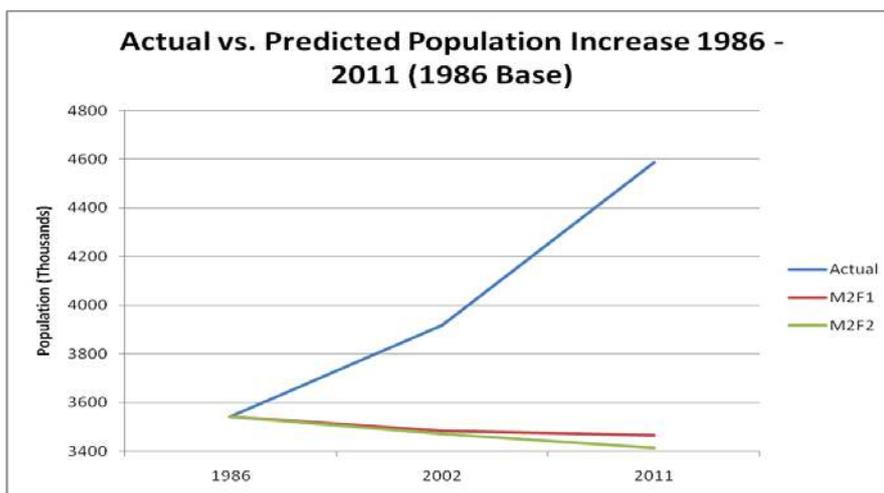
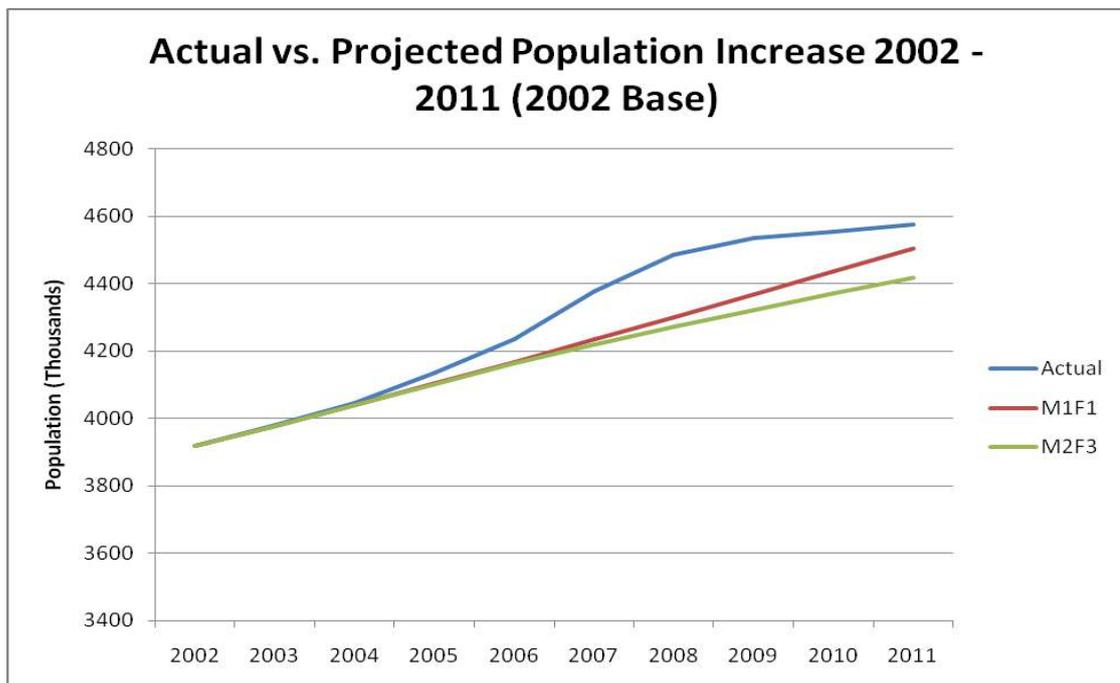


Figure 2.1: 1986 CSO Forecast vs. Actual Population as Recorded by CSO Census Data



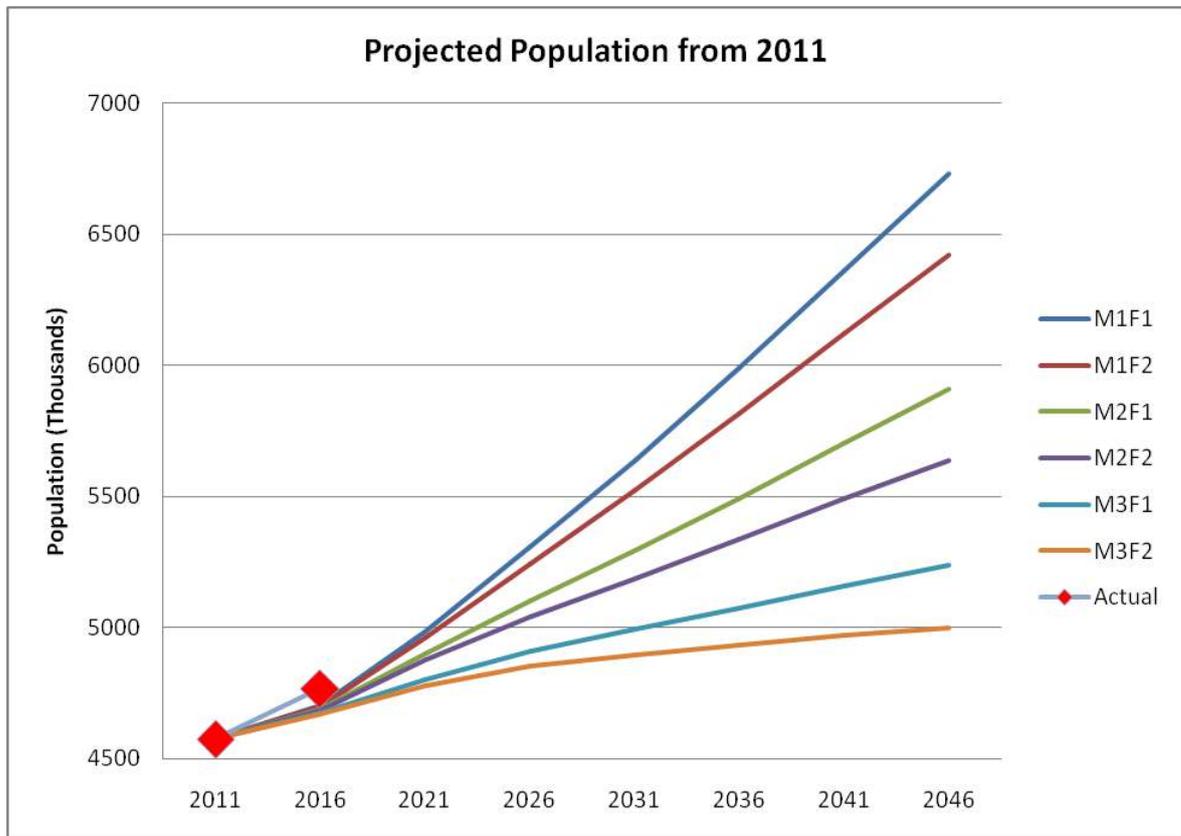
- 2.3.2 The CSO population projections for 2002 to 2011 versus actual are shown in Figure 2.3. The figure shows both the CSO highest (M2F1) and lowest (M2F2) population forecasts versus the actual. Again the CSO data demonstrates that even their highest population forecasts were significantly exceeded by the actual population growth over this relatively short timeframe.
- 2.3.3 As land use zoning is based upon long range CSO population forecasts, which have historically and admittedly been proved to under shoot the actual growth, maybe it's time the Core Strategy model which was introduced in the 2010 Planning and Amendment Act, which is based upon the forecasted population plus 50% headroom needs to be significantly revised to enable a realistic quantum of land to be made available to provide choice and to reduce the control of those persons who control the land and know that by sitting on it they will be in a position to artificially maintain high land values and house prices.



**Figure 2.2: 2002 CSO Forecasts vs. Actual Population as Recorded by CSO Census Data**

**2.4 Most Recent CSO Forecasts**

- 2.4.1 The most recent CSO forecasts produced in 2011 show a range of population projections up to 2046. This shows a wide population forecast range of between 5.1 million and 6.8 million by 2046 as illustrated in Figure 2.3. The preliminary CSO data for 2016 is also shown in Figure 2.3. This reveals that yet again the even the highest CSO forecasts for population have been exceeded, even during a period of economic stagnation and decline.



**Figure 2.3: 2011 Population Projections – V – Actual Population Growth**

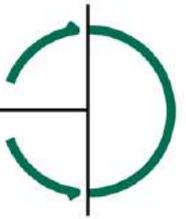
**2.5 Outcome of CSO Data Review**

2.5.1 The review of CSO forecasts going back several decades shows significant and consistent underestimates of population growth for the state. Given the reliance on CSO forecasts in policy formulation, including the current consultation document for the NPF, we would urge the Government to develop more realistic and more ambitious population targets that will allow the state to plan for future population growth.

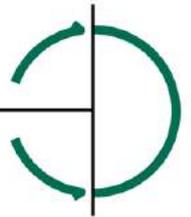
2.5.2 Indeed population growth is better measured against the employment level and hence economic growth in the state. As we are yet again reaching full employment and with medium term forecasts for high economic growth it is likely that, barring unforeseen economic mishaps, the population of the state will increase year on year by between 60,000 and 100,000 per annum. We note that this level of population was achieved in the period up to the recent economic crash.

2.5.3 Population growth had been particularly evident in Dublin and the GDA, which is set to continue and even accelerate in the future. Therefore if we are to address the current housing crisis, particularly within the GDA, far more robust population and housing needs need to be included in the NPF strategy. This includes:

- Estimated population of 5.2m by 2021 (440,000 more people).
- Need to provide new homes and communities for an additional population of 60,000 per annum and could be as high as 100,000 per annum (which was recorded in 2007).



- Need to provide for 60% of this growth within the GDA.
- Need to ensure that we do not simply provide piecemeal housing development but instead support and prioritise the need to deliver sustainable, affordable new communities in close proximity to employment growth centres and in a manner that supports wellness and meets out environmental objectives going forward.



### **3 REVIEW OF HOUSING NEED IN GDA**

#### **3.1 Forecast Demand**

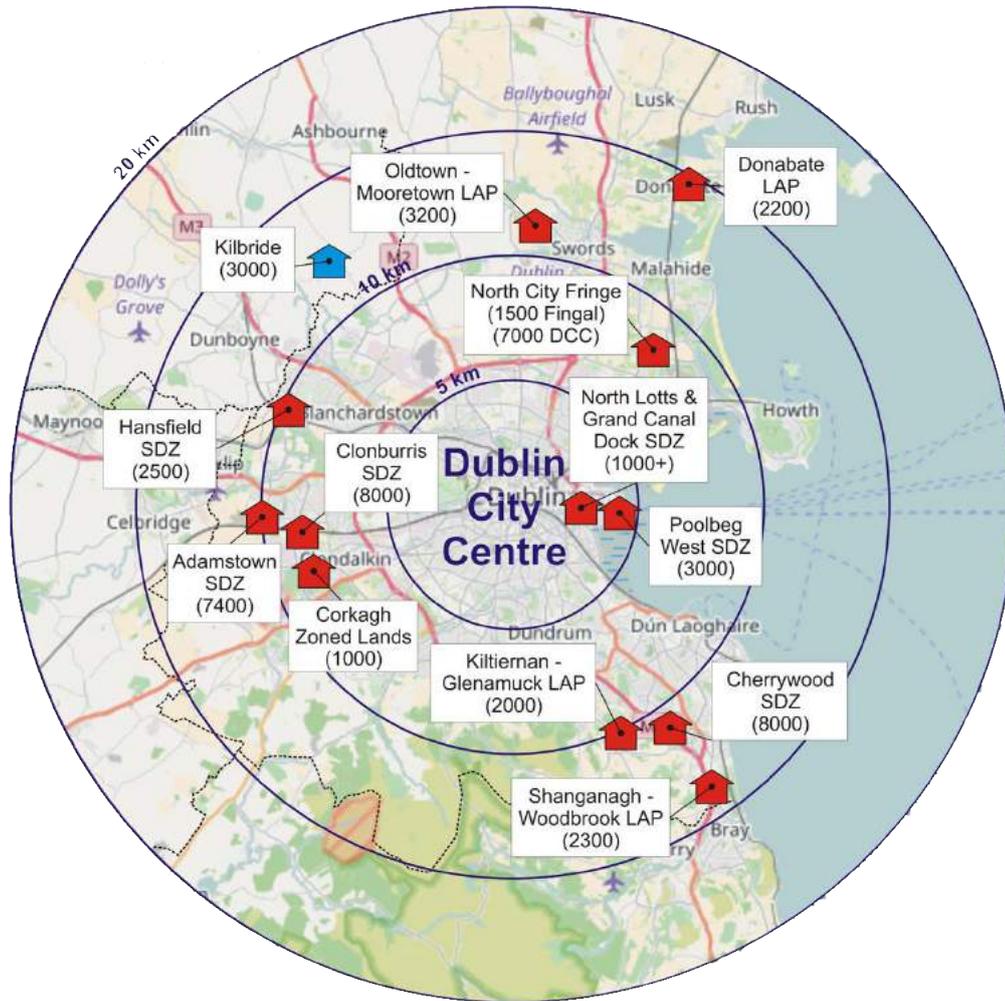
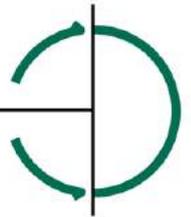
3.1.1 Based on projected economic growth and population in the GDA it is likely that over 60% of housing will need to be provided here. To meet the future population growth of the state and allowing for replacement of existing housing stock up to 40,000 new homes will be needed annually. This would mean a requirement of up to 24,000 new homes per annum in the GDA over the foreseeable future. This is in addition to the need to redress the existing housing shortfall, which is evident in the GDA at present.

#### **3.2 Overview of Major Delivery Sites in GDA**

3.2.1 Current estimates are that 23,000 units will be delivered annually over the coming years. Therefore, the housing crisis is set to continue and deepen.

3.2.2 The Government have identified major new housing delivery sites within the GDA as shown in Figure 3.1. The most recent Government announcement under Rebuilding Ireland was on 28<sup>th</sup> March 2017, where it announced funding for the provision of infrastructure on many of the sites shown in Figure 3.1 as well as sites in Ratoath, Sallins and Naas.

3.2.3 In the Dublin area, the Government has projected that up to 14,000 additional housing units will be provided up to 2021 with 37, 000 units to be delivered in the long term. Therefore, the delivery on these key sites will only contribute only one in every 8 houses need in the region to 2021 and even if the sites were delivered in their entirety in a timely fashion there would remain a chronic and growing housing shortfall in the GDA.



**Figure 3.1: Urban Housing Delivery Sites in GDA & Proposed Kilbride Sustainable New Community**

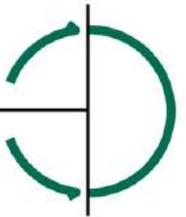
**3.3 Housing and Site Costs**

3.3.1 As well as just delivering housing units there is also the need to deliver affordable new homes. Many of the Urban Delivery Sites will not deliver homes or apartments at an affordable price. Indeed development lands within Dublin and the GDA are already commanding prices per plot in the region of €150,000 to €200,000 per unit. This means that many new residential units will be selling in excess of €400,000 even for starter homes.

3.3.2 This means that unless corrective action is taken through the identification locations for new homes at affordable prices within the GDA then housing will remain outside the reach of most at average or above average incomes within the GDA.

**3.4 Building New Sustainable Near Zero Communities – Kilbride as an Exemplar**

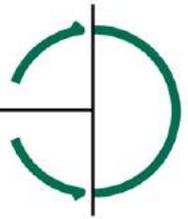
3.4.1 Simply providing additional housing, on its own, would not address the other key aspects of sustainable and healthy lifestyles. In addition, these new homes should be built adjacent to existing and planned employment growth centres.



- 3.4.2 The proposed development at Kilbride is one such project that could act as an exemplar as to how to deliver truly sustainable communities, at affordable prices, close to existing employment centres. Figure 3.1 shows the location of Kilbride in relation to the already identified Housing Delivery Sites. The next section will outline the key attributes of this proposed sustainable new community.
- 3.4.3 A recent submission made by Kilbride Estates Ltd. to the MCC CDP review, which contained more detailed information on the development is attached as Appendix A.

### **3.5 Recommended Changes to the NPF**

- 3.5.1 There is first and foremost a pressing need to significantly revise upwards the housing need in the GDA over the coming decade, with a delivered target of 24,000 units/annum proposed and to include same on the NPF. Secondly, the need to deliver new sustainable communities in close proximity to existing and planned employment growth centres should be prioritised. Thirdly, there is a need to ensure that new homes should, where possible, prioritise where wellness and climate change targets can be achieved and delivered.



## **4 AN EXEMPLAR NEW SUSTAINABLE COMMUNITY**

### **4.1 Introduction**

4.1.1 Kilbride Estates Ltd. has prepared what it believes is an exemplar of a sustainable new community that once delivered will ensure the delivery of affordable new homes, located adjacent to major employment growth poles and meeting the higher environment standards. Such a development would act as an exemplar of how the aspiration as set out in the consultation document can be achieved in practice.

4.1.2 The CDP submission attached as Appendix A contains a detailed description of the proposed new Near Zero Energy Community (nZEC) proposed at Kilbride.

### **4.2 Mission Statement for Developing a New Sustainable Community**

“To meet the needs of new residential communities for the 21st Century in a manner that promotes sustainable living, reduces the need to travel and provides an exemplar of how we can meet our emission targets.”

### **4.3 Planning and Transport Priorities**

4.3.1 The following are some of the key elements of the proposed new community

- Provision of affordable homes adjacent to existing and future employment growth poles
- A new nZEC community with its own energy centre
- A new community that reduces travel 1st Priority
- Reduce distance/time travelled = Greater community participation
- Provide high quality internal linkages for walking and cycling
- Promote Shared Living Concept with near Zero Emissions

4.3.2 We bench-marked the concepts from best and worst practice from Ireland, UK and Netherlands and combined these with new and emerging technology.

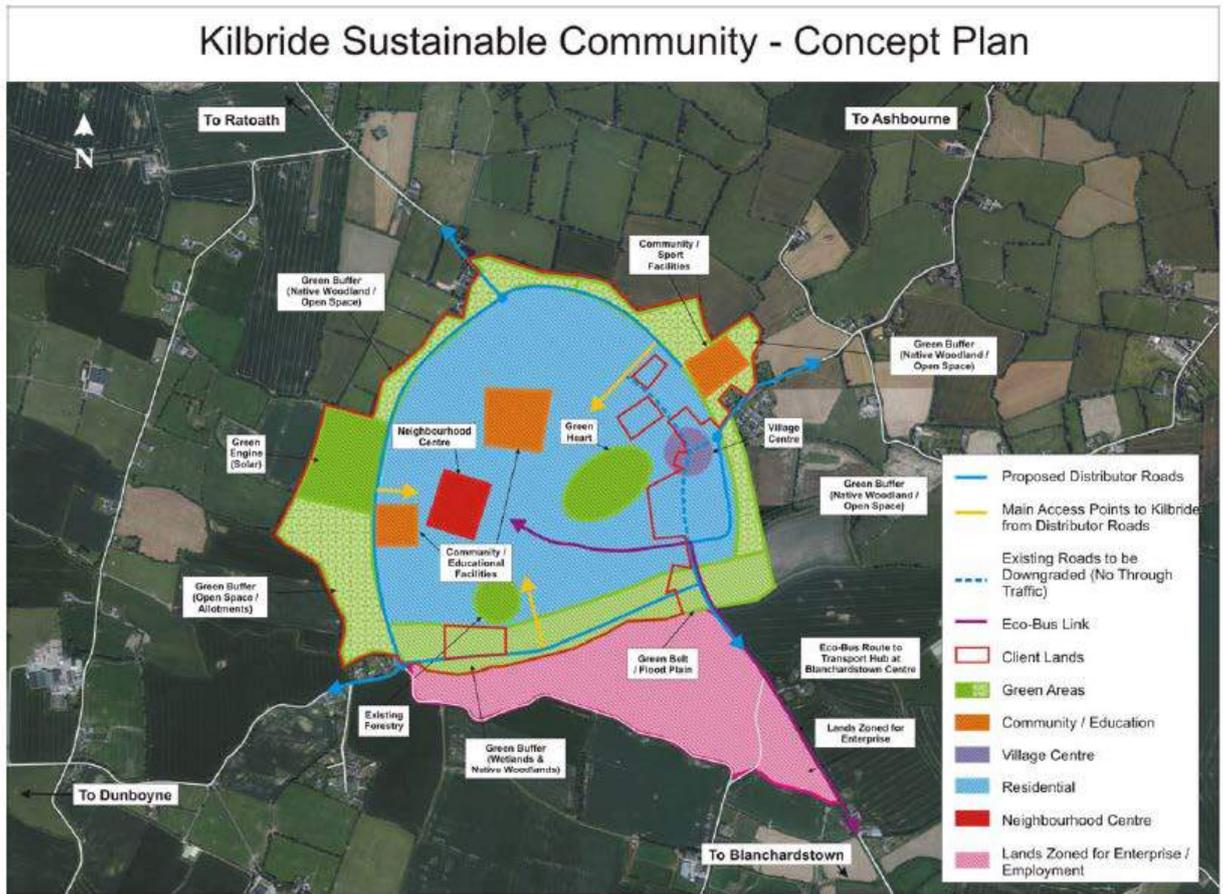
4.3.3 A new community where all services are locally provided and accessible, on foot or by bike and where people live in healthy and sustainable homes in a quality landscaped setting.

### **4.4 Key Components for Sustainable New Communities**

- A defined population (8,000) and land area (400 acres)
- Adjacent to major planned employment (27,000)
- Mixed affordable housing types for singletons, families, elderly etc.
- Integrated with leisure, sport and community facilities
- Zero carbon travel
- nZEB Housing and Community Buildings
- Quality landscape and streetscapes
- A community based around a central core

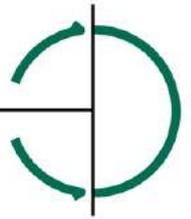


4.4.1 The overall concept plan for the nZEC community is illustrated in Figure 4.1 and show how all the key elements of a sustainable community can be accommodated within a defined land area and set in a quality landscape setting.



**Figure 4.1: Kilbride Near Zero Energy Community Concept Plan**

4.4.2 The detailed masterplan shows the proposed layout of this new community, to be established adjacent to the existing village of Kilbride is shown as Figure 4.2



**Figure 4.2: Kilbride Near Zero Energy Community (nZEC) Master Plan**

#### **4.5 The Benefits of Ecology in an Urban Context**

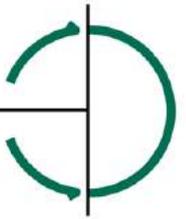
- Greenery can increase house price by 20%
- Improve well-being
- Contributes to urban beauty and attractiveness of a “place”
- Raises property value
- Ballsbridge has 1 tree for every 8 residents
- Dublin 1 has 1 tree for every 130 residents
- Kilbride proposes to have 1 tree per resident, in addition to wetlands, meadows and allotments

#### **4.6 Kilbride - Key Deliverables**

- The overarching priority is to facilitate the building of new affordable, sustainable and healthy communities
- Deliver cost efficient nZEB homes adjacent to major employment growth centre
- Deliver a sustainable new community in a planned fashion.
- EVs and Eco-Bus Services to provide zero emission travel
- An energy centre to power the community
- A healthy and integrated community within a quality landscape

#### **4.7 Electric Cars and Buses – Attributes**

- Zero Emissions
- Silent
- Lifespan approx. 12 years
- Accelerates and brakes more efficiently than heavier conventional buses
- Eco-Bus more cost efficient the other form of PT – Self funding
- E-cars powered from zero carbon energy sources



**4.8 Delivering New Sustainable Communities - Obstacles to Delivery**

- No readily available planning process to allow the early delivery of truly sustainable new communities
- No access to market process yet established to enable solar power to be delivered.

**4.9 Proposed Changes to the NPF**

- 4.9.1 The above demonstrates that nZEC communities can be developed at an affordable cost and in the right location. However, to allow the Kilbride and similar concepts to progress, the NPF must address the planning process which currently prevents such developments to progress in the immediate future. Secondly, it must allow access to the market for solar energy projects to be built in tandem with nZEC communities.



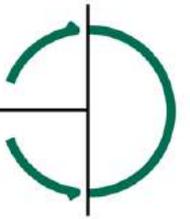
## 5 SUMMARY & CONCLUSIONS

### 5.1 Summary

- 5.1.1 The Department of Housing, Planning, Community and Local Government has commenced the preparation of the new National Planning Framework to replace the existing National Spatial Strategy. The Department has published an Issues Paper document inviting consultation from interested parties.
- 5.1.2 The CSO growth targets have in the past been used to forecast future population and housing need. A review of past CSO data shows that even their high growth predictions had consistently been exceeded. Therefore, using CSO forecasts will result in a NPF that will fail to meet the needs of the state going forward.
- 5.1.3 It is therefore proposed that unless housing targets are revised significantly upwards in the NPF then the housing crisis is set to get materially worse in the coming year. It is recommended that revised and realistic targets, based on actual historic growth rates, should be included in the NPF. It is estimated that unless 24,000 homes are delivered annually within the GDA, the current housing crisis is set to increase. Steps taken to date simply do not go far enough to deliver real change.
- 5.1.4 In addition, there is an urgent need to review the hierarchical process proposed in the NPF consultation document in terms of its implementation, as otherwise the time taken to give effect to the new NPF will be such that it cannot meet in a timely fashion the housing need of the GDA. This will result in significant increases in house prices or rent, which in turn will damage economic growth.
- 5.1.5 Kilbride Estates Ltd. appointed a multi-disciplinary team to develop a sustainable and affordable community concept that would deliver quality homes with wellness, sustainability and affordability at its core. The Planned Sustainable New Community, adjacent to the existing settlement at Kilbride, can succeed in delivering an exemplar of sustainable and affordable living immediately adjacent to major employment growth centres on the Dublin/Meath border.
- 5.1.6 The report recommends in Chapter 1 proposed and immediate changes to the Schedule 7 of the Planning and Development Act, which would allow for new sustainable communities to come forward in the immediate future, by way of a direct planning application to the Board.
- 5.1.7 The proposed Kilbride Sustainable Community would act as an exemplar delivering affordable, sustainable communities in a manner that promotes wellbeing and at near zero energy. This development would act as a demonstration project that could be replicated throughout the region and country. Further details of the proposed development at Kilbride are contained in Appendix A attached.
- 5.1.8 The NPF timelines and the subsequent changes required at regional, county and local level will mean that sustainable new communities such as that proposed at Kilbride can come forward in a timely fashion. If the NPF is to meet its goals it must be amended to allow for such worthwhile and necessary projects to come forward in the immediate future. Similarly, the changes to the electricity market are required to be addressed immediately to ensure that new communities can include renewable and zero carbon energy sources in tandem with nZEC.
- 5.1.9 Unless the changes proposed in are incorporated into the new NPF, the continuation of “business as usual” will become enshrined in the new NPF for years to come and the visions and goals as set out in the consultation document will not be delivered.



- 5.1.10 Our client would wish to continue working with the Department in further discussing and finalising the National Planning Framework, in a manner that would help meet the needs of the GDA and promote the orderly and proper planning and development of the state over the next decade and beyond.



**A APPENDIX A**

**A.1 Submission to Meath County Development Plan**

# **BAMFORD AND BONNER**

**URBAN AND RURAL PLANNING SOLUTIONS**

PRE DRAFT SUBMISSION TO THE

**MEATH COUNTY DEVELOPMENT PLAN 2019 – 2025**

IN THE FORM OF A REQUEST

**TO AMEND THE  
SETTLEMENT HIERARCHY FOR COUNTY MEATH  
TO FACILITATE THE SUSTAINABLE EXPANSION OF  
KILBRIDE, CO MEATH**

ON BEHALF OF

**KILBRIDE ESTATES LIMITED**

17<sup>TH</sup> FEBRUARY 2017



**BAMFORD AND BONNER**

URBAN AND RURAL PLANNING SOLUTIONS



Bamford and Bonner  
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Director of Services,  
Planning Department,  
Meath County Council,  
Buvinda House,  
Dublin Road,  
Navan,  
Co Meath

17<sup>th</sup> February 2017

**Re: Pre Draft Submission to Meath County Development Plan 2019-2023**

Dear Director,

On behalf of Kilbride Estates Limited, Warrington House, Mount Street Crescent, Dublin 2, we welcome the '*opportunity for the general public to shape their county into the future*' and in that context, we wish to make a formal submission for consideration during the preparation of the draft Meath County Development Plan 2019-2025.

Our submission is in the form of a request that the current settlement hierarchy is changed by elevating Kilbride from its current status as a 'Village' in the County Development Plan 2013-2019 to that of a 'Small Town' in the new County Development Plan 2019-2025.

This submission is prepared as a direct response to a number of questions asked in the 'Strategic Issues Paper', including—

- *Do you think the settlement hierarchy should be changed and if so how?*
- *How can the Development Plan aid and facilitate the delivery of more homes in the right locations?*
- *How and where can the housing needs of all sectors of our community be adequately accommodated?*
- *How can the County Development Plan best support new and evolving work patterns which reduce the demand to travel?*
- *How can the County Development Plan promote integration of land use and transport?*
- *How can the Council promote walking, cycling and the use of public transport more?*
- *How can the Council achieve a balance between the growth of the county and the protection of the environment?*

While this submission addresses the future development of the village of Kilbride it is not a request for the zoning of land and is therefore an appropriate type of submission to make to this strategic phase of the Development Plan making process.

This request to amend the Settlement hierarchy is supported by evidence, which is addressed in more Part 2 below.

The submission is structured as follows: -

Part 1 – executive summary of key issues

Part 2 – detailed submission that expands upon the issues outlined in Part 1.

## Executive Summary

### Putting People First

Kilbride will be County Meath and Ireland's first fully planned, sustainable (NZEB) community, bringing housing and employment together, and providing a mix of affordable house types, for the whole of life, around a truly safe, walkable environment.

Firstly we address the need for proposed changes to the Settlement Hierarchy as set out in the Strategic Issues Paper. The key reasons why Kilbride should be elevated from a 'Village' to 'Small Town' in the Meath County Development Plan 2019-2025 include:

- South East Meath and West Fingal will accommodate a significant proportion of all new residential development in the Greater Dublin Area over the next 20-25 years and Kilbride lies in the middle of the identified area (The Housing Agency).
- The 'Meath Economic Development Strategy' had targeted 7,500 new jobs in the county by 2022, many of which will be close proximity to Kilbride, while a further 20,000 jobs will be created less than 5km from Kilbride, in Fingal.
- Lands already designated for 'Enterprise and Employment' within Kilbride have the capacity to accommodate 1,000 new jobs and as the settlement expands, there will be scope to increase the quantum of land designated for employment uses in Kilbride.
- With an average of one job for every house in the country, there is a potential need for 27,500 new houses to serve the new jobs the majority of which will be created within 5km of Kilbride.
- At present the Core Strategy of the Development Plan has allocated a mere 3,273 houses to the 5 settlements of Dunboyne, Clonee, Ashbourne, Ratoath and Dunshaughlin, meaning that the existing settlements will accommodate only one in every eight new workers in the area, leading to continued unsustainable commuting trends. The actual demand for houses in these settlements could easily be two or three times that number.
- The 'Meath Economic Development Strategy' is about '*harnessing the capacity and potential of people*' and one way to do that is to deliver a fully planned and sustainable whole of life community at Kilbride with a generous mix of housing types that can be delivered in large numbers, at affordable rates and importantly, in close proximity to peoples places of work, thereby reducing unsustainable commuting patterns (both by car and rail) in the Greater Dublin Area and beyond and providing individuals and families with a better quality of life than is currently available.
- The recent Government response to the Housing Crisis requires that a proactive and imaginative approach is required to meet the housing challenge. The provision of additional sustainable and affordable housing close to existing employment particularly in the context of SE Meath and SW Fingal County will directly address the housing crisis and ensure that people can live in affordable homes close to these major employment zones.
- Kilbride will comprise a balanced community in terms of age profile, earnings and physical ability and will provide a beautifully landscaped and functional public realm, including Universal Access.
- Kilbride will bring together residential and employment - living and work - in one settlement.

## Transport – Harnessing the power of Zero Emission Vehicles

- From a transport perspective the Kilbride vision includes in decreasing order of priority as set out in the Government transport Strategy for the GDA the following: -
  - The first and foremost requirement of sustainable planning is to reduce the need to travel.
  - The second is to reduce distance travelled.
  - The third requirement is to promote necessary travel by sustainable and zero emission modes. Traditionally this has been interpreted as providing rail and bus service. However, with the advent of electric cars it is now possible to use private zero emission cars to meet the travel needs of the community.
  - Kilbride will provide its own, fully costed and self-funded eco-bus service, which again will have zero emissions.
- High density development near to rail stations is often and erroneously regarded as a demonstration of sustainable planning. Any commuting that encourages people to live remote for work, community, retail or other services only serves to promote unsustainable communities, with those commuting long distances spending less time with their families, less participation in local groups and organisation. They also spend less in local shops and businesses.
- Kilbride can not only achieve the GDA mode share targets, but surpass them. Crucially travel by road (bus or car) will be almost exclusively done using zero emission vehicles.
- Kilbride has been conceived as a permeable, walkable town. Due to its compactness, most day-to-day trips will be easily walkable.
- Incorporation of a solar farm will ensure optimising of energy consumption, including the effectiveness of electric car usage.

## Energy efficiency

- All the residential dwelling in Kilbride will first and foremost be NZB, meaning cool houses in summer and warm in winter. In addition these NZE homes will provide healthier building in which to live, which is particularly beneficial to those with respiratory or arthritic conditions and are most beneficial to the elderly and young.
- In addition the Energy Centre (solar or alternative) will provide sufficient energy to meet the balance of power requirement of the entire community, making this a truly near ZEB community.
- Indeed there is likely to at times be periods of surplus energy generation at Kilbride, which could be fed back into the grid. The rapid progress in battery storage technology also means that it will be possible to store this energy in the community to power the electric car and bus fleet. Therefore no fuels cost even for the zero emission vehicles.
- This will make Kilbride not just a wonderful and eco efficient community in which to live, but it also means a very efficient and competitive community that will spend less time travelling and where travel is necessary the cost of travelling will be far less.

## Kilbride – The Development Plan Vision

- The long term vision for Kilbride is that it will become a ‘Moderate Growth Town’ with a population in the range of 7,500 – 9,000, however, it will take time for the settlement to grow to that level and for that reason, as an interim proposal, for the County

Development Plan 2019-2025, it is proposed that Kilbride is designated as a 'Small Town'.

- The rationale behind a population range of 7,500 – 9,000 people is that in a fully conceptualised and planned, walkable settlement: every resident will be living within a 10 minute walk of the commercial core so that the majority of trips within Kilbride will be by foot or bicycle.
- Meath County Council has the necessary powers to enhance the status of Kilbride from a "Village" to a "Small Town" without any need to amend the settlement hierarchy at Regional level.

## Part 2 Submission

This section provides a more detailed analysis of the issues addressed in Part 1.

### Bringing housing and employment closer together

The 'Strategic Issues Paper' has identified unsustainable commuting patterns as a key action to be tackled with 54% of the counties 100,000 working residents commuting outside of the county on a daily basis resulting on long commuting times and a diminution of quality of life.

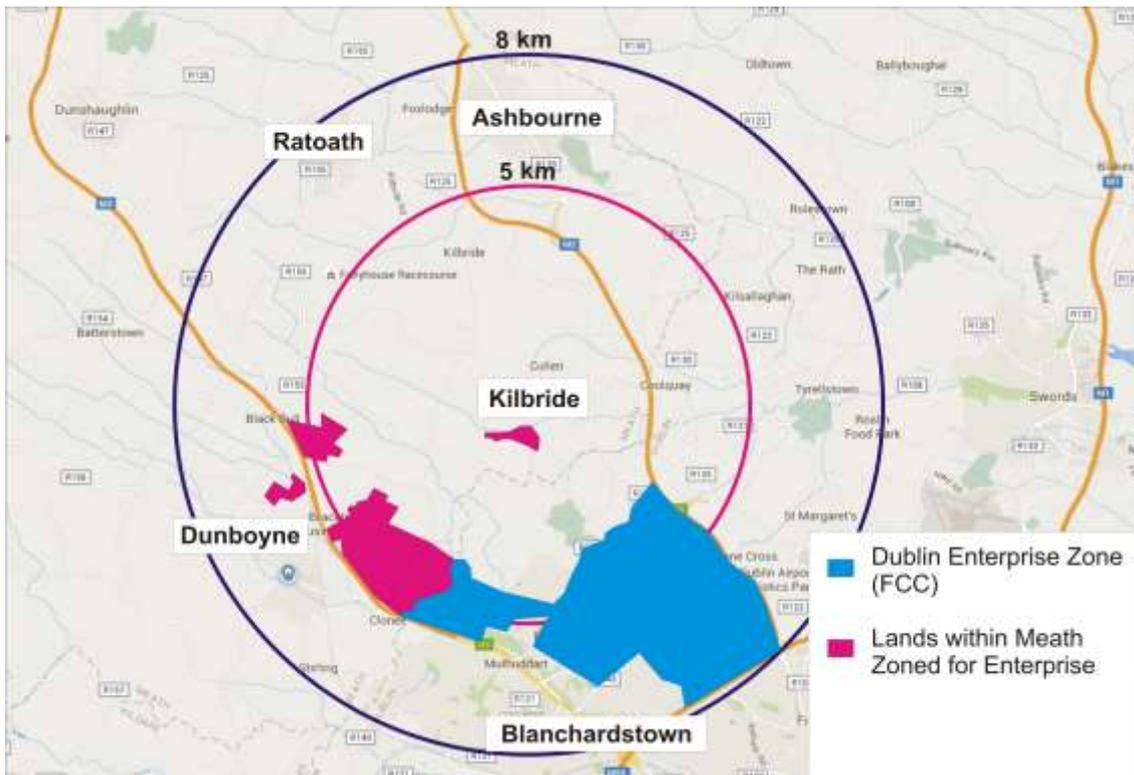
In addition to the employment potential of the 32.44ha of land zoned for enterprise and employment in Kilbride, the 'Meath Economic Development Strategy' has targeted the delivery of 7,500 new jobs for the county between 2014 and 2020, many of which will be created in close proximity to Kilbride, with major employers announcing their arrival in the county in 2016 adding more than 630 jobs. (*Shire at Piercetown (400 jobs) Facebook at Clonee (150 jobs) and Avoca in Dunboyne (80 jobs)*) not counting c2,500 temporary construction jobs. While not all of the 7,500 jobs will be in south east Meath, a significant majority will be while many other jobs will be delivered in the area post 2020.

In addition, Fingal County Council has targeted an additional 20,000 jobs in the nearby Dublin Enterprise Zone, with more than 1,100 employers already based in the zone.

With an average of one person working for every house in the country, there is a potential need for 27,500 new houses to serve the new jobs, the majority of whom will be will be working within 5km of Kilbride while many other local jobs, would be created within Kilbride, not least of all green economy employment opportunities that can form a major part of the sustainable community concept to be delivered.

Image 1 below shows the locations of Kilbride in the context of the major employment zones.

The development of Kilbride will prove a major attraction to the international companies that are being attracted to the county through the 'Make It Meath Campaign' and will contribute to the realisation of the Council's statement that *'Meath Offers all the benefits of a capital city without the cost and congestion'*.



**Image 1 Kilbride in the context of major employment zones**

The current 'Core Strategy' has allocated 3,273 houses to the 5 nearby settlements of Dunbooyne, Clonee, Ashbourne, Ratoath and Dunshaughlin and as of December 2014 permission existed for 2,637 units in the same towns, so there is significant additional capacity needed to accommodate those persons who will be employed in the County as well as in neighbouring Co. Dublin.

**The concept - Kilbride a fully planned sustainable (NZEB) community**

Kilbride can become Meath's and Ireland's first fully planned sustainable (NZEB) community and the county level policy mechanism for the delivery of that community is the 'Settlement Hierarchy'. Importantly, while Kilbride is proposed to be a planned community, it is not a new settlement.

The key difference between Kilbride and all other settlements in the county is that it will have a predefined and permanent development boundary beyond which it would not expand. It can be planned to be home to approximately 7,500 - 9,000 residents, over a period of time, with all supporting services such as retail, educational and recreational scaled appropriately. The settlement size is based on a conceptual layout for Kilbride that ensures that the retail and

commercial core, schools and recreational facilities will be no more than a 10 minute walk from any home and the principle modes of transport within Kilbride will be walking and cycling.

The advantage of planning an entire community from the outset is that the commercial core will become the exclusive focus of economic and social life of Kilbride rather than the current pattern in many older towns and villages throughout the country where pressures for out of town retail developments and large residential expansions can have a permanent detrimental impact on the economic life of the existing centres to the detriment of all residents.

The vision for Kilbride shares many of the characteristics of the recently passed Variation No 3 to the County Development Plan 2013-2019, the purpose of which is to develop a 'live work community' at Dunboyne while at the same time it is consistent with the analysis of the Housing Agency which has stated that a large proportion of the future residential expansion of not just County Meath but the Greater Dublin Area over the next 20 years will be concentrated in south east Meath and in west Fingal. Variation No 3 to the CDP was supported and defended by Meath County Council as being in accordance with the principles of proper planning of sustainable development when the concept was challenged by the Minister for Housing, Planning, Community and Local Government. The concept of the sustainable expansion of Kilbride is a logical extension of the same principles.

### **Kilbride's Location**

In order to develop an understanding of the significance of the rare opportunity that exists at Kilbride, which involves the development of a fully sustainable and planned community, we will first examine its locational context.

### **Regional Context**

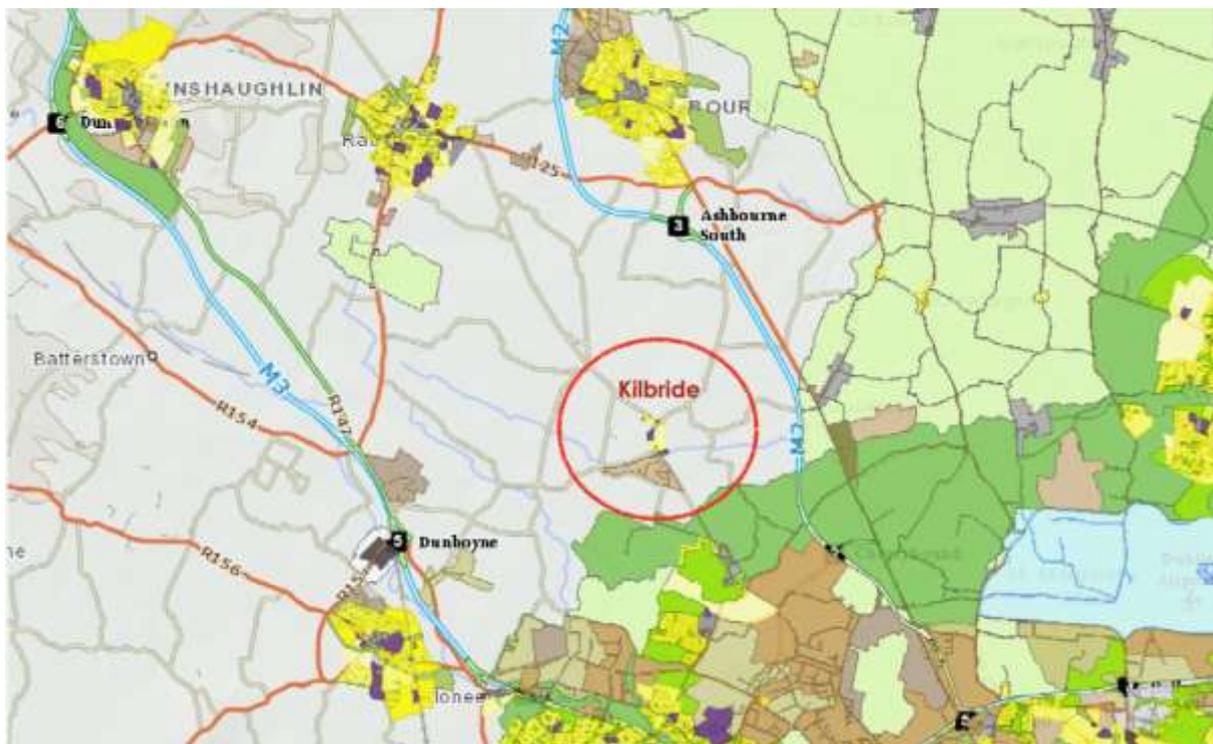
At a regional level, due to physical constraints such as the Dublin Mountains, the Liffey Valley corridor, the Dublin Airport Exclusion Zones including the proposed second runway and limited availability of development land in South Dublin and Dun Laoghaire, South Meath and Fingal have been identified by the Housing Agency as the areas that will accommodate a large proportion of the region's population growth in the next 20 years.

### **Local Context**

Kilbride is located in south east County Meath approximately 1.5 km north of the border with Fingal at Hollystown. Two of the largest towns in Meath, Ashbourne and Ratoath are located

respectively 5.5km and 6.5 km to the north, while Dunshaughlin lies 11km to the northwest. The town of Dunboyne sits 6km to the east, while the recently rezoned area of Dunboyne North adjacent to the M3 Parkway railway station is 5km east of the site. Blanchardstown, one of Dublin's largest town's is located 7km to the south and Swords and Dublin Airport are located c10km to the west.

The village is situated north of the exclusion zone established to facilitate the pending expansion of Dublin Airport. Good transport links exist to the national road network with access available to both the N2 and N3 Motorways within 5km of Kilbride while the M50 lies 7km to the south.



**Image 2** Location of Kilbride in context of other large towns in South East Meath [www.myplan.ie](http://www.myplan.ie)

### Kilbride Today

In the current County Development Plan sufficient land is zoned in Kilbride to accommodate 174 houses<sup>1</sup> and could through a series of planning applications for small housing developments, generate a population increase of 500 in a very short space of time. The current Development Plan<sup>2</sup> states that the 2011 population was 534, however, the residential population within the zoned area of Kilbride is more likely in the range of 100-150.

<sup>1</sup> Residential Land Availability Survey DOECLG 2014

<http://environmentgovie.maps.arcgis.com/apps/webappviewer/index.html?id=58f92f0517fc4ee0956f8933afc>

<sup>2</sup> Kilbride Written Statement – Volume 5 of the County Development Plan 2013-2019

Very soon and without any comprehensive plan for the village, the population could be over 1,000 simply by building a few small self-contained housing developments that are typical of all towns and villages throughout not just Meath but the country.

The existing Land Use Zoning Map for Kilbride including phasing is shown below.

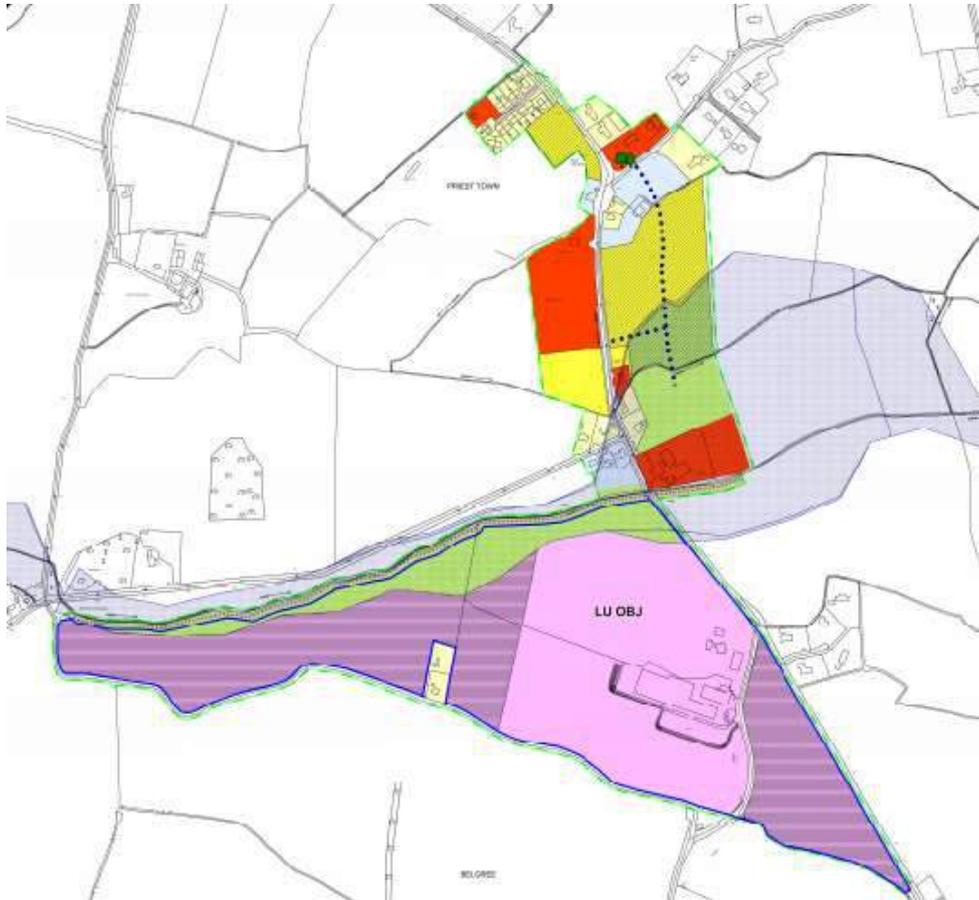


Image 3

Kilbride Zoning Map from CDP 2013-2019

### The vision for Kilbride

The 'Strategic Issues Paper' asks the following question –

*How can the Development Plan aid and facilitate the delivery of more homes in the right locations to increase supply?*

As an established but underdeveloped village that is strategically located proximate to major existing and future employment areas and nation transport corridors, Kilbride represents a rare opportunity to create a fully planned and modern walkable settlement that is designed for the future, having learnt from the mistakes of the past in terms of layout, public and private transport provision, house design and tenure.

As growth in Kilbride will be limited to a predefined geographic area, the surrounding countryside will be protected from continual growth pressures, thereby preserving both town and country. This compactness along with a permeable layout will ensure that the settlement is genuinely walkable, a key criterion in sustainable urban development.

The comprehensive planning and development of Kilbride will enable Meath County Council to deliver upon some of the key challenges that have been identified in the 'Strategic Issued Paper' including: -

- *Ensure sufficient, stable and sustained provision of housing that is affordable, in the right locations, meets peoples different needs and is of lasting quality.*
- *Meath has a significant role to play in addressing the current national housing crisis by providing solutions to the housing shortages.*

The reclassification of Kilbride from 'Village' to 'Small Town' in the new County Development Plan will facilitate the achievement of these key objectives for Meath County Council while it will also herald a paradigm shift in the way as a country we plan out settlements from the current limitless expansion of settlements on a field by field basis, to a fully planned and defined settlement model that has proven time and time again to be successful on continental Europe and in the UK, to the extent that the practice of developing settlements of particular size and scale and designing all associated infrastructure and facilities including retail, educational, amenity and recreational to needs of the planned population has become the norm rather than the exception.

The longer term vision for Kilbride, which will form part of the initial design concept, is that in time it will grow to a 'Moderate Sustainable Growth Town'.

### **Kilbride a planned versus unplanned settlement**

Kilbride proposed to be the first fully planned sustainable and integrated community.

While most people may not be aware of it, several other settlements in the county have grown from the size that Kilbride is today, to accommodate similar and greater populations than that envisage for Kilbride

The key difference is that the expansion of those settlements was delivered through short term planning visions with no overall strategic vision presented for the settlements and at the time of

writing, no long-term vision exists, for these settlement the growth of which is charted from 1961 to 2011 in the graph below.

In 1961, many of today's larger settlements in south County Meath were small villages like Kilbride is today, and their expansions commenced around the time that the first modern Planning and Development Act<sup>i</sup> came into effect in Ireland on 1<sup>st</sup> October 1964.

Those settlements have grown in an incremental manner over the following five decades to a point where they accommodate between c3,000 and 11,300 people in 2011 with lands zoned that can accommodate several thousand more houses and people.

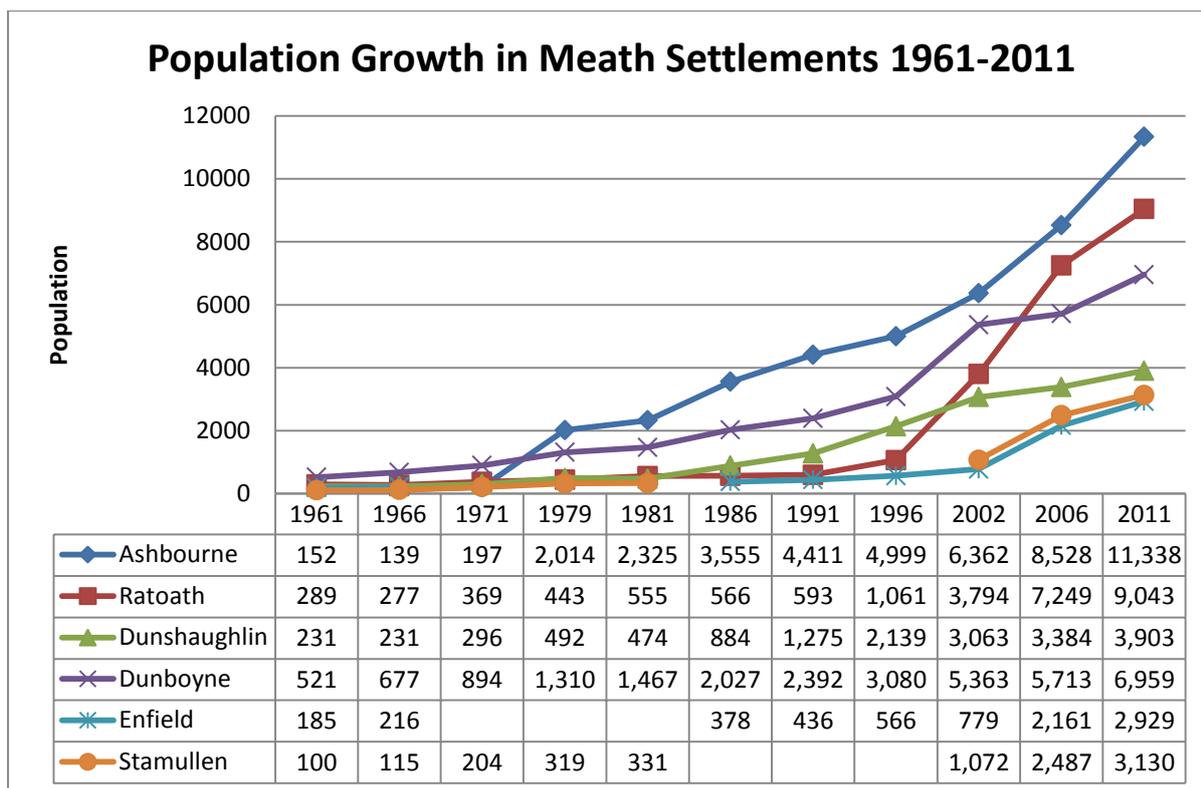
A key advantage of planning for an entire settlement from the outset rather than in incremental blocks is that the vision and objectives for the settlement are established from the beginning and thereafter all development will contribute to achieving that goal.

It is considered an advantage that Kilbride has not been developed to any significant extent at this time and for that reason it is almost a blank canvas that can build on both the strengths and history of the existing settlement.

The graph below examines the growth in population of other towns in county Meath over the 50 years from 1961-2011 and in 1961 all towns had populations ranging from 100 in Stamullen to 521 in Dunboyne while Ashbourne has grown from 152 to 11,338 in 2015 (+7,459%). Ratoath remained a relatively small town while it doubled in size in the 30 years from 1961-1991 (+304 [or +15 persons per annum]) and increased by a further 79% by 1996, in the following 15 years the population increased by 7982 persons (+852%), which is a significant increase and demonstrates that Meath County Council can plan for and deliver significant residential development in a single settlement that started out as a small village very similar to that of Kilbride.

The other settlements that are shown in the chart also experienced major growth in the last 5 decades with varying rates of increase experienced in each of the towns.

The exemplar settlements are considered to be direct and reliable precedents for the proposed sustainable expansion of Kilbride, with the exception that the settlement of Kilbride will be conceptualised in it's entirely from the outset rather than incrementally as is the case with the other settlements.



**Graph 1 Population Growth in settlements in County Meath 1961-2011**

The above table confirms that it is possible to take a small village and grow it into a large settlement, and the key difference with the concept for Kilbride, is that the growth will be planned from the outset and will be scaled so that services are provided at the right scale and in appropriate locations. This model could be replicated in other settlements in Meath and the GDA.

Alternatively, Kilbride may grow in a similar manner to the aforementioned towns, over a longer period of time and in a more piecemeal manner. The benefits of integration, connectivity, access and free movement that can be delivered by planning these elements from the outset, along with bringing living and work areas together in the settlement, would likely be lost in the traditional field by field model of development and this is not considered to be a sustainable form of development.

#### **Restrictions Imposed by Core Strategy**

Following from the Planning and Development (Amendment) Act 2010, the concept of core strategies was formally introduced into Ireland’s planning system with a view to restricting the over-zoning of land and the inappropriate development of land in unsuitable locations. Various methods of compliance were used by different local authorities including the de-zoning of large

areas of land and the introduction of the phased release of zoned land, which was the method chosen by Meath County Council.

Regardless of the restrictions imposed by the Core Strategy model of planning every planning authority should maintain a vision for how each and every settlement is expected to develop and planning should not simply be about numbers or restricting development to such an extent that it restricts the ability of people to live where they want to.

Table 1 below examines some significant differences between the numbers of allocated units versus the number of permissions granted in a select number of settlements. This evidence confirms that the method of allocating a specific number of houses to individual settlements is not an effective method of planning and serves no beneficial purpose that improves the lives of those persons who chose to live in a settlement and similarly, there are many settlements where no permissions have been granted, despite that allocation of a number of houses to that settlement.

Despite that fact that c31% of all housing in the county is allocated to Navan (3,984 units out of a total of 12,942), according to the local government website ([www.localgov.ie](http://www.localgov.ie)) that lists all commencement notices served in Ireland since January 2014, very limited development occurred in the town until recently. While it may be a desire of Meath County Council that Navan grows to a particular size and it may well grow to that target over a period of time, the reality is that the towns at the southern end of the county namely, Dunboyne, Ratoath, Dunshaughlin and Ashbourne are much more attractive places to live, due to their proximity to major employment areas and their expansion and the development of Kilbride should not be thwarted by such a limited view. The 'Meath Economic Development Strategy' underlines and sharpens the focus on this by accepting and building on the fact that south east is going to be the economic hub of the county. Navan can remain the county town regardless of its population and there are many examples of administrative capitals being smaller than other towns and cities within the same administrative area, both in Ireland and internationally.

**Table 1 Housing Allocation in Meath County Development Plan 2013-2019**

	Committed Unbuilt Units Nov 2011	Committed Unbuilt Units Dec 2014	Household Allocation 2013-2019	% of allocation Dec 2014
Navan	786	1,187	3,984	29.57%
Drogheda Environs	1,653	1,174	854	137.47%
Dunboyne	113	119	1,494	5.97%
Maynooth	0	0	199	0%
Ashbourne	1,356	1,132	637	177.70%
Trim	912	755	518	145.75%
Kells	349	352	518	67.95%
Dunshaughlin	784	763	319	239.18%
Kilcock	0	0	398	0%
Athboy	159	126	319	39.50%
Bettystown/Laytown / Mornington East	1,077	1,409	80	1761.25%
Duleek	160	169	239	70.71%
Enfield	31	34	319	10.66%
Oldcastle	9	24	319	7.52%
Ratoath	311	375	239	156.90%
Stamullen	262	262	80	327.50%
Clonard	90	92	20	460.00%
Clonee	601	248	84	295.24%
Kilbride	0	0	20	0%
Mornington / Donacarney	420	481	20	2405%
Rathmolyan	120	69	20	345%
Rural Houses	1,479	1,479	1,320	112.05%

While housing development in Navan has stalled for a good number of years until recently, the development of Dunboyne has been significantly curtailed by the cost of development land, the consequent prices of house and a lack of demand for expensive houses in the area.

Meanwhile the number of permissions granted in Ashbourne, Dunshaughlin and Ratoath has significantly exceeded the allocation provided to each in the Settlement Hierarchy while each of the settlements has experienced a slow but steady pace of residential development in the period since January 2014.

The new 'Settlement Hierarchy' and the allocation of housing to those settlements needs to be significantly amended to reflect where demand exists and is likely to exist in the future and must including the re-designation of Kilbride from 'Village' to 'Small Town'.

## Transport and Travel

The first and foremost requirement of sustainable planning is to reduce the need to travel. Less time travelling means more time spent at home and in the community. This also increases local spend which in turn creates more local employment. In addition it also means that far greater number of trips can be done on foot or by cycle.

The second is to reduce distance travelled. This can be best achieved by placing new residential development in close proximity to employment.

The third requirement is to promote necessary travel where possible by sustainable and zero emission modes. Traditionally this has been interpreted as providing rail and bus service. However with the advent of electric cars it is now possible to use private zero emission cars to meet the travel needs of the community with Zero emissions vehicles.

The use of smart technology, car sharing and driverless cars (forecast to be in use with 5 to 10 years) means that private cars will increasingly become community cars. Increasing car occupancy by 50% in zero emissions would reduce traffic flows on our road network by 1/3 and greatly reduce overall emissions.

There clearly will be a need to have public transport. Kilbride will provide its own, fully costed and self-funded eco-bus service, which again will have zero emissions. This makes it more environmentally friendly than existing public transport modes that are diesel powered and it will not require any state subsidy.

High density development near to rail stations is often and erroneously regarded as a demonstration of sustainable planning. Any commuting that encourages people to live remote for work, community, retail or other services only serves to promote unsustainable communities, with those commuting long distances spending less time with their families, less participation in local groups and organisation. They also spend less in local shops and businesses.

The mode share target for Kilbride compared to the GDA target and best international comparator (Houten in the Netherlands) as shown in Table 2 below. This clearly demonstrated that Kilbride can not only achieve the GDA mode share targets, but surpass them. Crucially travel by road (bus or car) will be almost exclusively done using zero emission vehicles, with 27,500 new jobs located within a short distance of Kilbride.



which to live with high indoor air quality, which is particularly beneficial to those with respiratory or arthritic conditions and are most beneficial to the elderly and young.

The NZEB concept will be extended to all building in Kilbride, making it NZEC or a nearly Zero Energy Community. Accordingly, the community aspect of sustainability will include sustainable urban drainage systems (SUDS). In addition an Energy Centre (solar or alternative) will provided sufficient energy to meet the balance of power requirement of the entire community, including the powering of electric cars with maximum efficiency achieved due to the energy source being contiguous to use, making this community authentically NZEC.

Indeed there is likely at time to be periods of surplus energy generation at Kilbride, which could be fed back into the grid. The rapid progress in battery storage technology also means that it will be possible to store this energy in the community to power the electric car and bus fleet. Therefore no fuels cost even for the zero emission vehicles.

This will make Kilbride not just a wonderful and eco efficient community in which to live, but it also means a very efficient and competitive community that will spend less time travelling and where travel is necessary the cost of travelling will be far less. All of the above strategies will help produce a powerful model for sustainable buildings and communities.

## Conclusion

The 'Meath Economic Development Strategy' has identified south east Meath as a key location for the delivery of new jobs and in 2016 alone 630 new permanent jobs have been created within 5km of Kilbride with construction well underway on these projects. At the same time Fingal County Council has targeted an additional 20,000 jobs within an 8-10 minute drive of Kilbride and the Housing Agency has stated that south east Meath and west Fingal will accommodate a large proportion of the population growth in the Greater Dublin Area over the next 20—25 years.

Kilbride is strategically located in the heart of this expansion area and as an existing underdeveloped settlement provides a rare opportunity to deliver a truly sustainable and fully affordable planned community which is within easy reach of major employment and can accommodate up to 9,000 residents when fully developed.

While a number of other settlements are located within 5-10km of Kilbride, all suffer from various difficulties and restrictions due to the short term and incremental nature of how they have been

planned, typically on a field by field basis. Major difficulties include a lack of permeability for pedestrians and traffic congestion brought about by way of the physical layout of the settlements.

It is also evident from a review of Census data, records of planning permissions granted and building commencement notices that the pace of growth of settlements of all sizes throughout the county does not reflect their position where those settlements are located in the current Settlement Hierarchy. It is also clear that the new Settlement hierarchy need to be comprehensively revised and updated in the new Development Plan to reflect the current status of each settlement and to reflect the extent that the planning authority expect those settlement to grow to, as it is not considered appropriate that settlements are allowed to expand forever and in an unplanned manner.

The key difference between Kilbride and all other settlements in the county it that it will have a predefined and permanent development boundary beyond which it would not expand, with all supporting services such as retail, educational and recreational scaled appropriately.

The elevation of Kilbride from a 'Village' to a 'Small Town' in the Draft Meath County Development Plan 2019-2025, can be delivered without having any impact on the regional 'Settlement Hierarchy and will herald a paradigm shift in the way as a country we plan out settlements from the current limitless expansion of settlements on a field by field basis, to a fully planned and defined settlement model that has proven time and time again to be successful on continental Europe and in the UK, to the extent that the practice of developing settlements of particular size and scale and designing all associated infrastructure and facilities including retail, educational, amenity and recreational to meet the needs of the planned population has become the norm rather than the exception.

It is requested that this submission be taken into account in the preparation of the draft Meath County Development Plan 2019-2025 and that Kilbride is designated as a 'Small Town'.

Yours Sincerely,



Joe Bonner

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<sup>i</sup> Local Government (Planning and Development) Act 1963