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# **Town Planning Submission**

**Draft Meath County Development Plan 2020-2026**

**Lands to the North of Racehill Park, Ashbourne, Co. Meath**

**Formal Submission on behalf of David Rogers, Peter O' Sullivan &  
Sean Quinn**

**6<sup>th</sup> March 2020**



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## 1.0 Introduction

Hughes Planning and Development Consultants, 70 Pearse Street, Dublin 2, have been instructed by our clients, David Rogers, Peter O' Sullivan & Sean Quinn, to make a submission on the Draft Meath County Development Plan 2020-2026, with respect to Lands to the North of Racehill Park, Ashbourne, Co. Meath. This submission is made in response to a public notice dated 18<sup>th</sup> December 2019, inviting submissions up until 6<sup>th</sup> March 2020, in relation to the Draft Meath County Development Plan 2020-2026. In summary this submission requests that Meath County Council considers the following:

- *That the landholding which is the subject of this report, be duly considered for re-zoning from the zoning objective of E2 'General Enterprise & Employment' to the zoning objective A2 'New Residential'.*

We request that the recommendations of this submission be given full consideration in preparation of the forthcoming Meath County Development Plan 2020-2026.

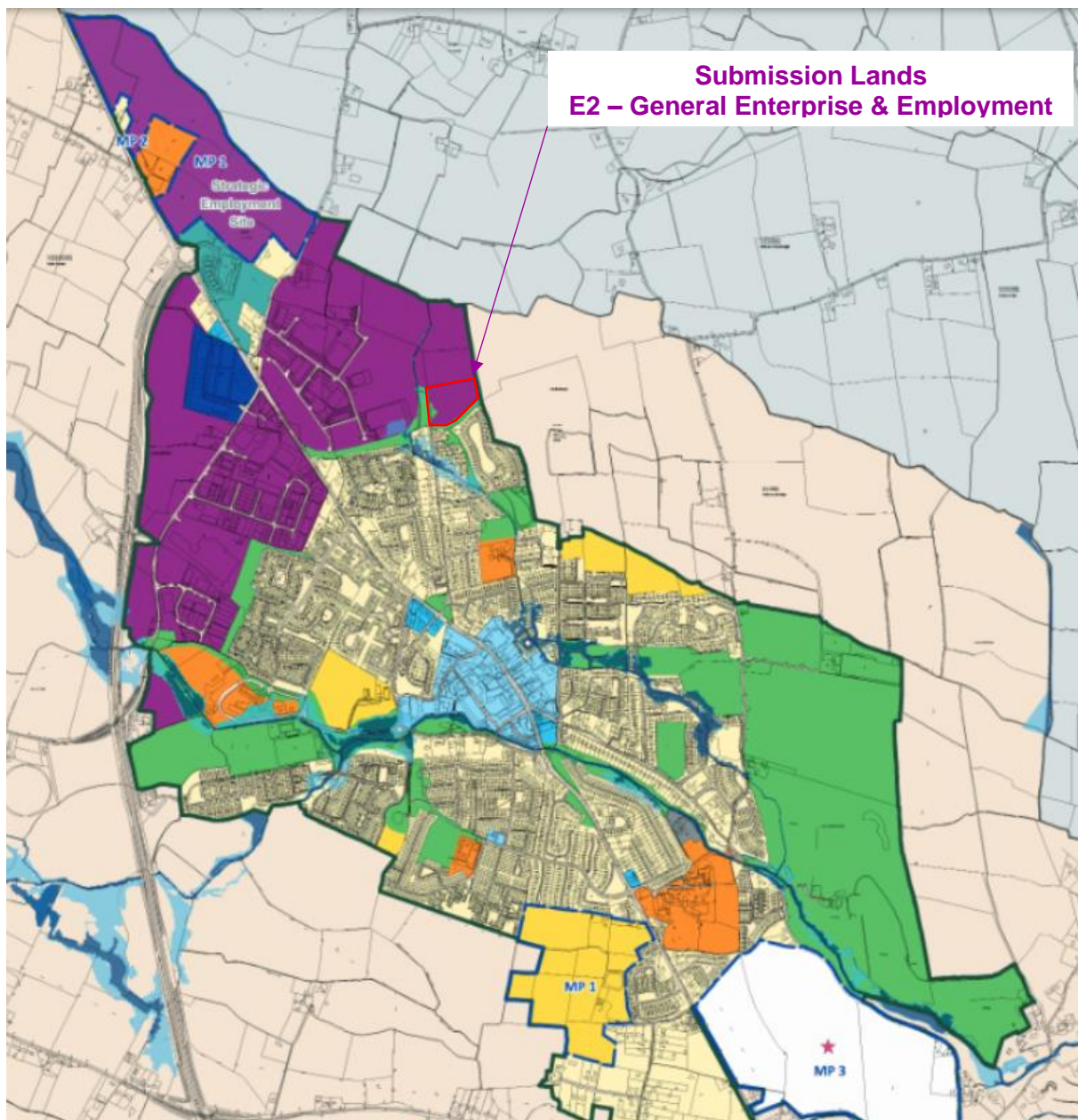


Figure 1.0 Sheet No. 1 (a) Land Use Zoning map for Ashbourne, as contained within the Draft Meath County Development Plan 2020-2026, showing the location of subject site.

## 2.0 Submission Lands

The site which is subject to this submission extends to c. 2.9 hectares and consists of an irregular shaped body of land situated to the immediate north of the 'Racehill' residential estate. The site is bound to the west by undeveloped lands situated east of Ashbourne Business Park and to the north and east by undeveloped fields in agricultural use. It is noted that the subject site is, in development terms, landlocked at present. This situation is based on the zoning objective which governs both the subject site and un-developed/serviced lands to the immediate north, the agricultural use of lands to the immediate east and the historical development of Ashbourne Business Park.

To develop the site appropriately, in the context of the current zoning objective, would require the construction of an access road, c. 300m in length, linking the site to the existing business park. This access road would have to cross lands to the immediate north of the site which are not under our client's ownership and, as such, the development of the subject site is compromised until such time that these adjoining sites are developed. It is possible to provide direct access to the site via Racehill Road to the immediate south, a road serving the greater 'Racehill' residential estate. The use of this existing residential access road to access a commercial development would compromise the amenity of the area through increased noise and traffic as a result of HGVs and articulated trucks.

It is submitted that the subject site, given its irregular shape and the manner in which existing residential development has been built to the southern boundary, does not lend itself to commercial use. In this regard, it is considered most appropriate to rezone the subject site for residential use. The fact that an existing spur road is available to provide direct connection between existing residential development and this site suggests that it was purposefully set to allow for the future extension of residential lands to the south.

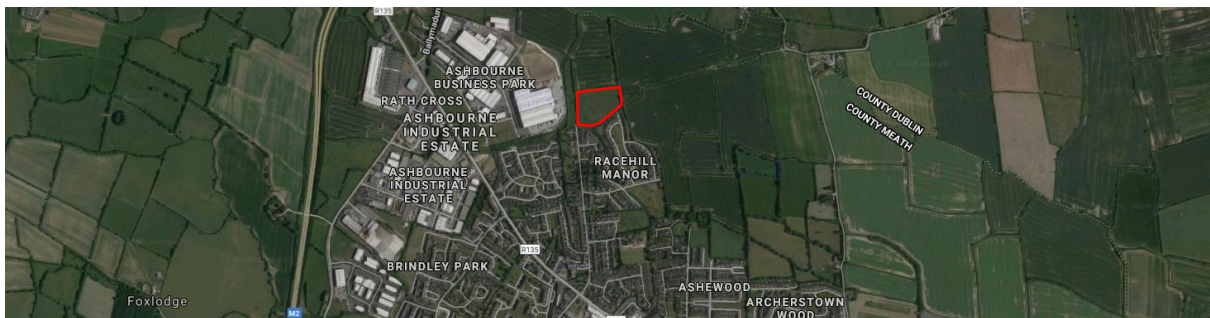


Figure 2.0 Aerial view of subject site, red outline, within the context of Ashbourne Town.



Figure 3.0 Aerial image of the subject site (red outline) in the context of adjoining lands, the area outlined in blue is also under the ownership of our client. The area outlined in green is a bank of land which is yet to be developed as public open space ancillary to the Racehill residential estate.



Figure 4.0 Existing site access gate at the northern extent of the Racehill residential estate.



Figure 5.0 The southern boundary of the subject site presents a rather abrupt transition in the context of adjoining residential development to the immediate south.



Figure 6.0 A bank of undeveloped land (centre) associated with the Racehill residential estates provides a natural separation between the subject site and the eastern boundary of the Ashbourne Business Park.

### 3.0 Planning Policy - Local Level

#### 3.1 Meath County Development Plan 2013-2019

The Development Plan sets out the Town Council's overall strategy for the proper planning and sustainable development of Meath together with policies and objectives for the future development of the County for the period 2013-2019. The Plan seeks to develop and improve in a sustainable manner the social, economic, cultural, physical and environmental assets of Meath. Its successful implementation will have a positive impact on the County. The Development Plan sets out a hierarchy of various population settlements within Meath to outline the relationship between various human population centres based on their size, population, and available services in a manner which assists in the future development of County Meath. Ashbourne, with a population of approximately 12,679, is listed as a 'Moderate Sustainable Growth Town' within Table 2.1 'County Meath Urban Settlement Hierarchy' of the Development Plan. The description contained within the plan for moderate sustainable growth towns is as follows:

*'10km from large town on public transport corridor, serve rural hinterland as market towns.'*

The submission site is guided, under the current development plan, by the zoning objective 'E2' - General Enterprise and Employment, the wording of which is as follows:

*'To provide for the creation of enterprise and facilitate opportunities for employment through industrial, manufacturing, distribution and other general employment/enterprise uses in a good quality physical environment.'*

#### 3.2 Draft Meath County Development Plan 2020-2026

Under the Draft Meath County Development Plan 2020-2026, the submission site remains subject to the 'E2' - General Enterprise and Employment zoning objective. It is also considered prudent to note that the settlement hierarchy of County Meath has been revised on-foot of the provisions of the Regional Spatial and Economic Strategy (RSES) 2019). Ashbourne is now listed as a 'Self-Sustaining Growth Towns' settlement under Table 2.3 'Settlement Hierarchy for Meath' of the Draft Development Plan. The description contained within the plan for self-sustaining growth towns is as follows:

*'Towns with a moderate level of jobs and services – includes sub-county market and commuter towns with good transport links and capacity for continued commensurate growth to become more selfsustaining'.*

We note and respond to further commentary from Section 3.4.8 'Rural Settlement Strategy' of the Draft Development Plan in respect of rural settlements as follows:

*'The completion of the new town centre development in Ashbourne has significantly improved the retail provision in the town. Employment and enterprise in Ashbourne benefits from its proximity to Dublin Airport, its strong links with the Dublin Metropolitan Area, and its location along the N2 strategic road corridor. As Dublin Airport continues to expand it is anticipated that the strategic importance of Ashbourne as a place of employment in Meath and the wider region will increase'.*

It is considered that Ashbourne is strategically located to benefit from the future expansion of Dublin Airport and will continue to develop as a commuter town for those working in Dublin City. The urban centre of Ashbourne provides numerous amenities for local residents and is, in itself, a strong employment centre. It is submitted, in this regard, that Ashbourne has sufficient capacity to accommodate additional residential development and that the zoning of the subject site to provide same will allow for the consolidation of this urban settlement.

*'This Plan identifies the strategic importance of Ashbourne and will support and facilitate industry, employment, and enterprise in the settlement as it continues its transition to a Metropolitan Centre. As part of the future growth strategy for Ashbourne and to improve connectivity with Dublin City Centre it is an objective of this Plan to explore the feasibility of providing a rail link to Ashbourne as part of Phase II of the Navan Rail Project'.*

*'Ashbourne's link to Dublin Airport and Dublin City Centre provides a solid basis for the settlement continuing to expand. There will be a stronger emphasis on the provision of employment and necessary social and physical infrastructure with any continued residential growth.'*

With regards to Ashbourne, the above commentary suggests that the settlement is appropriate for an increased quantum of residential development. In this respect we note the following vision for settlement and housing strategy, as presented in Section 3.2 of the Draft Development Plan:

*'To facilitate the sustainable growth of the towns and villages throughout the County by promoting consolidation and compact development in an attractive setting that provides a suitable mix of housing and supporting amenities and ensuring co-ordinated investment in infrastructure that will support economic competitiveness and create a high quality living and working environment.'*

Further to the above, it is considered necessary to zone additional lands for residential purposes to ensure the organised expansion of Ashbourne's population in line with future employment growth. The development of a rail link between Ashbourne and Dublin City Centre provides further justification for increased residential development of the Town as it will strengthen commuter links through the provision of a public transport service for this route. The subject site, being zoned land, is suitably located so as to support the consolidation of Ashbourne's urban centre. The provision of a residential development at this location is considered appropriate given the fact that the site adjoins an existing residential estate to the immediate south and an area of public open space to the immediate west.

#### 4.0 Submission Request

As stated previously, the Draft Meath County Development Plan 2020-2026, which has considered the provisions of the Regional Spatial and Economic Strategy (2019), lists Ashbourne as a 'Self-Sustaining Growth Town'. The site to which this report pertains has remained subject to the previous zoning objective of 'E2' - General Enterprise and Employment under the Draft Meath County Development Plan 2020-2026. Upon review of the Draft Plan, which outlines the expected considerable growth of Ashbourne on foot of its strategic location and the development of future transport links, it is considered that the subject site represents an appropriate location for further residential development within Ashbourne and, as such, we request that the site be re-zoned as A2 – New Residential.

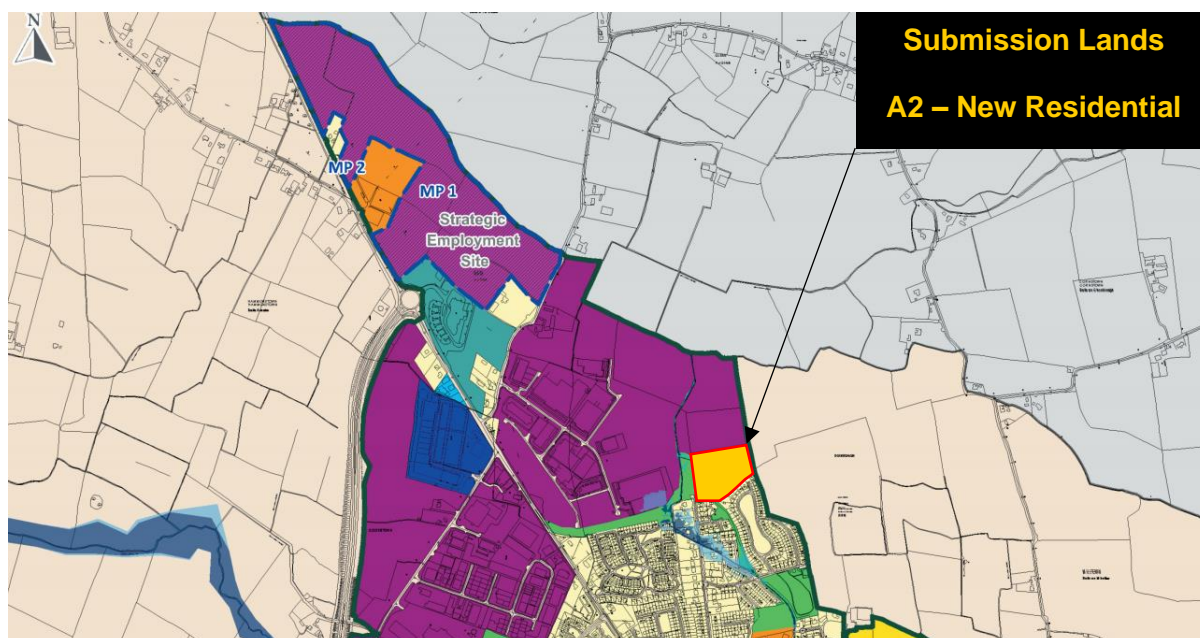


Figure 7.0 Extract from Ashbourne Zoning map of the Draft Meath County Development Plan 2020-2026 with the submission site re-zoned as A2 – New Residential.

In this regard, we would ask that Meath County Council consider the following factors in its assessment of this submission:

#### 4.1 Development Context

As stated previously, the development site is, at present, landlocked in terms of its development potential. Notwithstanding this, our client is eager to develop the site and, subject to it being rezoned to provide for residential development, would be willing to engage with the Planning Authority to construct a social/affordable housing development at this location. In this regard we note the following guidance under SH POL 4 of the Draft Development Plan:

*‘To promote social integration and the provision of a range of dwelling types in residential developments that would encourage a mix of tenure, particularly in any State funded house building programmes.’*

The re-zoning of the subject site to provide residential development will allow for the provision of further social and affordable housing within the County and will comply with the above policy. In addition, it is noted that the site is served by an existing road which provides access to Racehill, a residential estate situated to the immediate south. The re-zoning of the site to provide for residential development is considered appropriate in that existing issues such as boundary treatment between the site and adjoining residential lands can be addressed and a more appropriate treatment can be provided between the northern boundary of the site and adjoining lands subject to the ‘E2’ – General Enterprise and Employment zoning objective.

#### 4.2 Access

The subject site is accessed via an existing road which serves Racehill residential estate. This road connects to Tudor Grove which, in turn, connects to Frederick Street, the main thoroughfare through Ashbourne. Travelling via Frederick Street, the M2 motorway is located at a distance of 2.4km north-west of the subject site with Dublin City Centre also accessible via the R135, which is located 2.4km south-east of the subject site. With regards to public transport accessibility, it is noted that Bus Eireann Route Nos. 103, 103X, 105, 109A, 193, 194, 194A and 197 all operate via Frederick Street, within c. 750m of the subject site. These services connect the site to Dublin City Centre and further employment centres at Blanchardstown, Drogheda and Navan.



Figure 8.0 Bus Eireann service operating via Frederick Street, c. 750m south of the subject site.



Figure 9.0 The subject site is situated within 2.4km of the M2/N2 Motorway which provides access to Dublin City Centre.



Figure 10.0 The subject site is situated within 2.4km of the M2/N2 Motorway which provides access to Dublin City Centre.

### 4.3 Local Services

Due to its location within 750m of the centre of Ashbourne, the subject site is situated within close proximity to numerous local facilities for education, recreation and shopping as presented below.



Figure 11.0 Map illustrating the proximity of the subject site (red outline) to existing amenities within Ashbourne.

The amenities illustrated in Figure 11.0, are as follows:

*Educational* St. Mary's National School, St. Declan's National Catholic School, Ashbourne Educate Together National School, Coláiste De Lacy, Galescoil Na Mí and Ashbourne Community School.

*Recreational* Ashbourne Rugby Club, Ashbourne United AFC, National Shooting Ground, Ashbourne Golf Club, Ashbourne Community Centre, Donaghmore Ashbourne GAA Club, Coolmine Gymnastics Club and Vue Cinema Ashbourne.

*Shopping* Ashbourne Retail Park, Dunnes Stores, Supervalu Shopping Centre, Tesco Superstore with further shopping available via Frederick Street and Killegland Street.

It is noted that each of the above-mentioned amenities is located within 2.4km of the subject site thus providing a high standard of residential amenity for future residents.

#### 4.4 Infrastructure

It is noted that there are no restrictions with regards to necessary service provision within Ashbourne in the context of the future development of the submission site for residential purposes. The site is appropriately located so as to benefit from existing water supply, wastewater and road infrastructure.

#### 4.5 Physical Upgrades

It is submitted that the re-zoning of the subject site to provide for residential development will be beneficial for the immediate environment in the form of physical improvements to both site boundaries and the further provision of open space for the local community. With regards to the boundaries of the existing site, it is noted that there is a particularly abrupt transition between the southern boundary of the site and adjoining residential development.

The re-zoning of the site to provide residential development would allow this existing transition to be addressed by means of a new housing development. This could result in either the continuation of the existing building line or the provision of public open space to provide a natural and organised transition between existing and future built environment. Either option would allow for a more visually appropriate form of development at this location and would improve the residential amenity of existing residents.



Figure 12.0 The southern boundary of the subject site presents a rather abrupt transition.

In addition, it is considered that the re-zoning of the subject site to accommodate residential development would provide an opportunity to ensure an appropriate boundary is provided in the context of the northern boundary of the subject site, so as to ensure that the future development of 'E2' – General Enterprise and Employment will not compromise the amenity of neighbouring residential development.

The development of a residential scheme at this location would also be beneficial due to the provision of associated road upgrades, street lighting and new pedestrian footpaths along the northern extent of Race Hill and an improved interface with the adjoining public open space to the immediate west of the subject site.

#### 4.6 Development Contributions

The submission site extends to c. 2.9 hectares. In the event of a residential development being accommodated upon the submission site and, on the basis of achieving a residential density of 35 no. units per hectare as is considered applicable via the County Development Plan for 'Moderate Sustainable Growth Towns' such as Ashbourne, it is submitted that the site would be liable for contribution fees for residential development. Furthermore, we note the currently applicable contribution fees which are attached for residential development as presented in Figure 13.0, below.

Category of Development	Floor Area (rounded to the nearest m <sup>2</sup> )	Contribution
<b>Residential Development (per individual unit)</b>		
	< 100 sq. m.	€6,000
	100 - 140 sq. m.	€6,500
	141 - 200 sq. m.	€7,500
	201 - 300 sq. m.	€9,000
	> 300 sq. m.	€11,000

Figure 13.0 Meath County Council contribution fees for residential development.

On the basis of future residential units providing an average floor area of 100-140sq.m, it is considered that a residential development at this location would yield an applicable contribution fee of c. €659,750.

#### 5.0 Planning Policy - National Level

##### 5.1 Eastern & Midland Regional Assembly Regional Spatial and Economic Strategy (2019)

Whilst direct reference to the urban settlement of Ashbourne is limited within the Regional Spatial & Economic Strategy (2019), it is considered to represent a strategic connection within the Dublin Metropolitan Area due to its proximity to the Regional Growth Centre of Drogheda, the key towns of Swords, and Navan and its location within the Core Region as illustrated in Figure 14.0, overleaf. In this regard we note the following commentary from the strategy in relation to the development of Ashbourne's future transport infrastructure:

*'The settlements for which Local Transport Plans will be made will include, but will not be limited to, Athlone, Dundalk, Drogheda, Arklow, Ashbourne, Balbriggan, Longford, Mullingar, Portlaoise, Naas, Navan, Newbridge, Tullamore, and Wicklow-Rathnew and certain large settlements or development areas within the Dublin Metropolitan Area.'*

The preparation of a local transport plan suggests that there will be investment in sustainable mobility services within Ashbourne in the coming years. This could lead to increased choice with regards to public transport services within the urban settlement and improve the efficiency of existing services. Moreover, we note further positive commentary with regards to Ashbourne from the strategy document:

*'In addition some of these settlements, such as Ashbourne and Ratoath have the potential to strengthen their employment base and develop as important centres of employment due to their strategic location, connectivity with surrounding settlements, and the availability of a skilled workforce.'*



Figure 14.0 Extract from Figure 3.1 ‘Growth Strategy – Strategic Connections’ of the Eastern & Midland Regional Assembly Regional Spatial and Economic Strategy (2019) illustrating Ashbourne’s position within proximate distance of Drogheda, Swords and Navan. Ashbourne is also located within close proximity to the Dublin-Belfast Economic Corridor and Core Region.

It is submitted, on the basis of the above commentary and map extracts, that Ashbourne represents an appropriate location for further residential development. The urban centre, which is situated within close

proximity to both Dublin City Centre and a number of smaller employment centres, will benefit from improved transport services in the medium to long-term and, further to Ashbourne's recent growth as a commuter settlement, is it envisaged that Ashbourne will expand its own employment base. These factors would suggest that the provision of further residential development within Ashbourne on sites located within close proximity to lands zoned for employment related uses, such as the subject site, could allow for a more sustainable form of development in the future with enhanced permeability and mobility services allowing for increased worker satisfaction and quality of life.

## 5.2 Project Ireland 2040 – National Planning Framework

The purpose of the National Planning Framework is to enable all parts of Ireland, whether rural or urban, to successfully accommodate growth and change, by facilitating a shift towards Ireland's regions and cities other than Dublin, while also recognising Dublin's importance. The Project Ireland 2040 - National Planning Framework (2018) seeks more balanced and concentrated growth, particularly within the five major cities in Ireland. The following target is outlined in relation to national growth:

*'We have five cities in Ireland today in terms of population size (>50,000 people): Dublin, Cork, Limerick, Galway and Waterford. In our plan we are targeting these five cities for 50% of overall national growth between them, with Ireland's large and smaller towns, villages and rural areas accommodating the other 50% of growth'.*

More specifically, strategies are included in Chapter 2.2 of the Planning Framework which seeks to target a greater proportion (40%) of future housing development to be within and close to the existing 'footprint' of built-up areas. The National Planning Framework outlines that;

*'a major new policy emphasis on renewing and developing existing settlements will be required, rather than continual expansion and sprawl of cities and towns out into the countryside, at the expense of town centres and smaller villages.'*

The proposed development is appropriately sited within the existing settlement of Ashbourne, and does not constitute urban sprawl. The National Planning Framework also pushes for the growth in population in jobs in the counties surrounding Dublin. The location of the site will ensure that growth is contained within the metropolitan boundary, and will offer *'improved housing choice, transport mobility and quality of life.'* The proposed development is consistent with the above as it involves the development of undeveloped yet zoned land which is in close proximity to existing public transport services. It is considered that, subject to increased development, Ashbourne is appropriately located so as to contribute to the national strategic outcomes of the National Planning Framework as presented in Figure 15.0, below.



Figure 15.0 National Strategic Outcomes and Strategic Investment Priorities of the Project Ireland 2040 – National Planning Framework.

### **5.3 Urban Development and Building Heights - Guidelines for Planning Authorities, December 2018**

These guidelines are intended to set out national planning policy guidelines on building heights in relation to urban areas, as defined by the census, building from the strategic policy framework set out in Project Ireland 2040 and the National Planning Framework. The guidelines outline that there is significant scope to accommodate anticipated population growth and development needs, whether for housing, employment or other purposes, by building up and consolidating the development of our existing urban areas.

The rationale for consolidation and densification to meet our accommodation needs applies in relation to locations that development plans and local area plans would regard as city and town centre areas as well as areas in and around existing urban areas and suburban areas.

This policy encourages the facilitation of increased levels of residential development in our urban centres and significant increases in the overall density of development through the planning process, particularly at local authority and An Bord Pleanála levels. Increasing prevailing building heights is deemed to have a critical role to play in addressing the delivery of more compact growth in our urban areas, particularly our cities and large towns through enhancing both the scale and density of development. In particular, increased density and height of development within the footprint of developing sustainable mobility corridors and networks, where substantial investment in public transport infrastructure has been made as part of Project Ireland 2040. SPPR 1 goes on to outline the following in relation to this:

*'In accordance with Government policy to support increased building height in locations with good public transport accessibility, particularly town/city cores, planning authorities shall explicitly identify, through their statutory plans, areas where increased building height will be actively pursued for both redevelopment and infill development to secure the objectives of the National Planning Framework and Regional Spatial and Economic Strategies and shall not provide for blanket numerical limitations on building height.'*

*'While achieving higher density does not automatically and constantly imply taller buildings alone, increased building height is a significant component in making optimal use of the capacity of sites in urban locations where transport, employment, services or retail development can achieve a requisite level of intensity for sustainability. Accordingly, the development plan must include the positive disposition towards appropriate assessment criteria that will enable proper consideration of development proposals for increased building height linked to the achievement of a greater density of development.'*

It is considered that the subject site is appropriately located so as to accommodate a high density residential development within close proximity to the Ashbourne Business Park, the design of which can respond to the future development of neighbouring sites to the immediate north so as to limit the proximity between residential and employment functions within the town. Further to the above, the site is located within close proximity to central Ashbourne and a number of public transport (bus) links are available within c. 750m of the site.

### **5.4 Rebuilding Ireland – Action Plan for Housing and Homelessness, July 2016**

The 'Action Plan for Housing and Homelessness' was published in July 2016 as part of the Government's Rebuilding Ireland initiative. This is a whole-of-Government plan seeks to double residential construction output to 25,000 homes per year by 2020; deliver 47,000 units of social housing by 2021; make the best use of existing housing stock; and lay the foundations for a stronger, more stable private rented sector. The Action Plan seeks to address existing issues of housing supply and homelessness in Ireland through five 'Pillars', which include;

1. Address Homelessness
2. Accelerate Social Housing
3. Build more Homes
4. Improve the Rental Sector
5. Utilise Existing Housing

The rezoning of the subject site to accommodate residential development will allow for the greater provision of social housing services within Ashbourne. As stated previously, our client is eager to develop the subject site and, subject to it being rezoned to provide for residential development, would be willing to engage with the Planning Authority to construct a social/affordable housing development at this location.

### **5.5 Quality Housing for Sustainable Communities – Guidelines for Planning Authorities (2007)**

The purpose of these Guidelines is to assist in achieving the objectives for Delivering Homes, Sustaining Communities contained in the Government Statement on Housing Policy which focuses on creating sustainable communities that are socially inclusive by promoting high standards in the design and construction and in the provision of residential amenity and services in new housing schemes.

The subject site is located within 750 metres of the centre of Ashbourne which features several local amenities such as shops, restaurants, entertainment venues etc. Furthermore, the site is also situated within 750 metres of Bus Éireann Route Nos. 103, 103X, 105, 109A, 193, 194, 194A and 197 which provide direct access to Dublin City Centre and University College Dublin.

In addition, a residential development on the subject site could allow for further provision of public open space within the immediate area to promote a sense of community both within future and existing residents.

### **6.0 Conclusion**

This submission is prepared in response to the Draft Meath County Development Plan 2020-2026 in preparation of a new Development Plan for Co. Meath. In summary this submission requests that Meath County Council considers the following:

- *That the landholding which is the subject of this report, be duly considered for re-zoning from the zoning objective of E2 'General Enterprise & Employment' to the zoning objective A2 'New Residential'.*

We trust that the Planning Authority will have regard to the contents of this submission in the adoption of the Draft Meath County Development Plan 2020-2026.



Kevin Hughes MIPI MRTPI  
Director  
for HPDC Ltd.