

Senior Executive Officer,
Planning Department,
Meath County Council,
Buvinda House,
Dublin Road,
Navan,
Co. Meath.
C15 Y291

6th March 2020
JSA Ref: 17217

Dear Sir/Madam,

RE: DRAFT MEATH COUNTY PLAN – REZONING SUBMISSION IN RELATION TO LANDS AT BETTYSTOWN, CO. MEATH ON BEHALF OF DAVY HICKEY PROPERTIES.

1.0 INTRODUCTION

- 2.1 We refer to the publication of the Draft Meath County Plan on the 18th of December 2019. Davy Hickey Properties, 27 Dawson Street, Dublin 2 has instructed John Spain Associates to prepare this submission on their behalf.
- 2.2 At the outset, our client welcomes and supports the publication of the Draft Meath County Plan.
- 2.3 Our client, Davy Hickey Properties (DHP) has a significant track record of delivering exceptionally high quality residential and commercial development in the Greater Dublin Area. The DHP group has a proven track record on delivering large scale developments. Having regard to the ongoing shortfall in the supply of housing the subject lands could be developed in the near future if planning permission is granted.

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Summary

2.4 In reference to the Draft Meath County Plan the following is noted:

- Bettystown, Co. Meath is located on the Dublin to Belfast corridor, which is identified in the RSES as playing a critical role in supporting economic growth and competitiveness. The development of the subject lands for residential purposes (proximate to public transport) will secure the delivery of new homes at a suitable location and contribute to the sustainable growth of the area.
- The subject lands are partially zoned for White Lands, Open Space and Community Infrastructure use in the existing East Meath Local Area Plan (LAP) 2014-2020. The lands previously held a zoning for residential use in the 2005 East Meath LAP and were incorporated into a masterplan for the area within the Bettystown Framework Plan of 2009. This illustrates the planning authority's acceptance of the principle of residential land use at the site.
- The adopted Meath CDP should recognise the supporting role that towns such as Bettystown with rail links within the Dublin to Belfast corridor can play in the building of a critical mass of population in the area. In this regard our client supports Objective BLMD OBJ 7 which seeks to facilitate a new car parking facility at Laytown Train Station and BLMD OBJ 8 which seeks to facilitate the provision of a train station at Bettystown, both of which will improve the public transport provision in the area.
- DHP recognise the inherent need for new homes in County Meath at present. Such development should be brought forward at sustainable locations which are accessible to local services and transport links, as well as being associated with existing residential areas and nearby infrastructure which has capacity to support new development.
- In respect of the NPF Tiering approach, the subject site is considered to constitute Tier 1 Zoned Lands as they are lands that **'are able to connect to existing development services, i.e. road and footpath access including public lighting, foul sewer drainage, surface water drainage and water supply, for which there is service capacity available, and can therefore accommodate new development'**.
- It is clear that Bettystown holds significant potential for growth over the period of the next Meath CDP given its accessible location, infrastructure provision and transport links. Davy Hickey Properties have a reputation for delivering high quality residential development across the Greater Dublin Area and can contribute positively to the organic growth of Bettystown through new housing at the subject site. This will also serve to achieve the objectives of the existing East Meath LAP through the delivery of open space and community infrastructure as part of the wider scheme.
- The lands are a logical sequential extension to neighbouring development, with capacity existing at the local waste water treatment plant. The site has no notable constraints in respect of ownership or physical matters. A strategic road objective is located adjacent to the east which will serve to improve the site's accessibility from and connectivity with the surrounding area as well as increasing road capacity to accommodate residential development at this site. In this respect, the subject lands are ideally located to justify a zoning objective for residential use in the Meath County Development Plan 2019-2025. We note

that Meath Co. Co. are on site to complete advance works in respect of the R150 Spine Road.

- The lands are located immediately adjacent to 2 no. primary schools and one secondary school. Given the national housing shortage, this site would be suitable for immediate development.
- Based on the foregoing, it is respectfully submitted that the extent of lands under ownership of Davy Hickey Properties (c. 16.9 hectares) be identified as having a valuable role in contributing to the housing need for Meath and the Greater Dublin Area.
- It is considered that the delivery of growth in the town of Bettystown over this transitional period would be appropriate given the existing capacity of the town to accommodate residential development and population growth, both on foot of existing physical and social infrastructure, and having regard to the location of the subject lands and Bettystown to the Irish Rail network.
- Having regard to the above, it is respectfully submitted that the adopted Meath CDP should recognise the potential of locations with existing public transport (Bettystown for example), located within the Dublin to Belfast economic corridor to accommodate a higher population growth trajectory during the transitional period, due to its existing capacity for growth, based on existing infrastructure (including social infrastructure) and services.

2.0 SITE LOCATION AND CONTEXT

- 2.1 Davy Hickey Properties owns lands totaling approximately 16.9ha located approximately 1.2km south of Bettystown town centre. The site currently exists as greenfield land immediately abutting adjacent residential development to the south and a recently completed school and education campus to the east.

Figure 1: Site Location Plan (Google Maps)



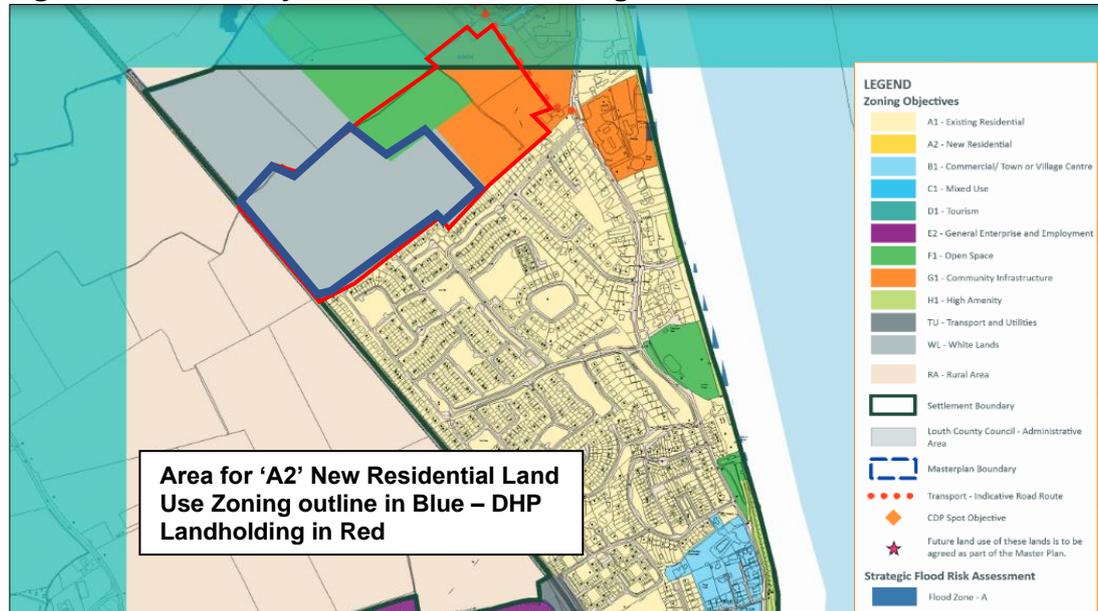
- 2.2 Agricultural land is located to the north and the site bound by the east coast railway line to the west. The site falls in elevation moving east, towards the Irish Sea. Figure 1 notes the location of the site in the context of its surroundings.

3.0 RATIONALE FOR REZONING

- 3.1 Bettystown, Co. Meath is located on the Dublin to Belfast corridor, which is identified in the RSES as playing a critical role in supporting economic growth and competitiveness. The development of the subject lands for residential purposes (proximate to public transport) will secure the delivery of new homes at a suitable location and contribute to the sustainable growth of the area.
- 3.2 The Bettystown area has experienced significant population growth in recent times, seeing population almost double between 2001 and 2011. Population has grown more modestly since, with Census data noting a total of 11,872 in 2016. However, the settlement's growth rate is likely to increase in the short-term due to current housing construction activity.
- 3.3 The settlement's current population of 11,872 places it behind only Navan and Ashbourne in population size in a County Meath context.

- 3.4 Under the Draft Meath CDP the land are designated as 'WL' 'White Lands', 'G1' 'Community Infrastructure' & 'F1' Open Space. A Road objective is included along the frontage of our client's landholding. We note that Meath Co. Co. are on site to complete advance works in respect of the R150 Spine Road.

Figure 2: Draft Bettystown Land Use Zoning



- 3.5 With regard to the zoning status of the lands from WL to A2 New residential, the site possesses the following positive attributes:

- Centrally located within the settlement;
- Immediately adjacent to three schools;
- Will contribute to delivery of planned new road infrastructure (MCC on site in relation to advance works)
- Within 500m of nearest bus stop;
- Within 1km of local convenience retail provision;
- Accessible to Bettystown town centre, 1.2km north;
- Existing train station at Laytown 1.2km south;
- Planned train station approximately 1.1km north west;
- Potential contribution to meet needs for communal open space lands and facilities;
- Serviced by all necessary infrastructure;
- Immediately adjacent to existing development to the south and east;
- No flood risk constraint;

- 3.6 It is also noted our clients lands include Community and Open Space land use zoning objectives. The delivery of proposals on the community and open space lands would be in tandem with the residential development of the lands. The effect of the current WL designation is to delay social infrastructure to the settlement.

- 3.7 We refer the Planning Authority to Appendix 1 which relates to an analysis of the lands in the town.

- 3.8 In summary, the lands are a logical extension to neighbouring development, with capacity existing at the local waste water treatment plant. The site has no notable constraints in respect of ownership or physical matters. A strategic road objective is

located adjacent to the east which will serve to improve the site's accessibility from and connectivity with the surrounding area as well as increasing road capacity to accommodate residential development at this site.

- 3.9 With respect of the NPF Tiering approach, the subject site is considered to constitute Tier 1 Zoned Lands as 'there are basic development services i.e. road or footpath access including lighting, drainage connectivity (foul or surface water systems) and water supply available, all of which have capacity to accommodate development, at the boundary of the zoned lands. This means that a planning application for the development may be considered during the life of a development or area plan'.
- 3.10 The lands are strategically located in terms of proximity to infrastructure and meet all the assessment criteria for zoning of lands according to proper planning and sustainable development as outlined in the Local Area Plan Guidelines.
- 3.11 We note that Meath Co. Co. are on site to complete advance works in respect of the R150 Spine Road. In this respect, the subject lands are ideally located to justify a zoning objective for residential use in the Meath County Development Plan 2019-2025. It is also noted that elsewhere within Bettystown substantial tracts of land are identified as comprising a flood risk.
- 3.12 These lands were previously zoned residential and changed to white zoning which set aside for longer term residential development. Our clients lands were considered to be the next best location previously, it is respectfully submitted, logically the next best site for residential zoning.

4.0 CONCLUSIONS

- 4.1 It is clear that Bettystown holds significant potential for growth over the period of the next Meath CDP given its accessible location, infrastructure provision and planned improved transport links. Davy Hickey Properties have a reputation for delivering high quality residential development across the Greater Dublin Area and can contribute positively to the organic growth of Bettystown through new housing at the subject site. This will also serve to achieve the objectives the existing East Meath LAP through the delivery of open space and community infrastructure as part of the wider scheme.
- 4.2 It is reiterated that Davy Hickey Properties is committed to further appropriate and high quality residential development at Bettystown which will contribute to the sustainable growth of the area in accordance with national and regional policy.
- 4.3 It is considered that having undertaken an evaluation of existing residential development and site zonings in Bettystown, bringing forward the subject lands to a residential A2 zoning at this time is justified having regard to servicing, infrastructure and access to local social facilities.
- 4.4 Based on the foregoing, it is respectfully submitted that the extent of lands under ownership of Davy Hickey Properties (c. 16.9 hectares) be identified as having a valuable role in contributing to the housing need for the Greater Dublin Area and should be zoned New Residential in the adopted Development Plan for Meath.
- 4.5 We respectfully request that Meath County Council takes this submission into account and to provide for residential zoned land on the subject lands.

Yours Faithfully,



John Spain Associates

Appendix 1

From a review of the lands in Bettystown below, sites A-E below are effectively under construction/complete and as a result the future development of the area requires additional lands to satisfy strong demand for housing. In this respect, it is submitted that the Planning Authority should seek to mitigate this deficit through residential zonings at locations which are capable of delivery in the short term, such as our client's landholding.

It is therefore vital that the Planning Authority look to identify and appropriately zone residential sites in accordance with the guidance set out in the National Planning Framework which seeks to promote Tier 1 serviced lands for the delivering of residential units within the lifetime of the next Plan period, having regard to the lack of supply.

Our client's lands are a logical extension to neighbouring development, with capacity existing at the local waste water treatment plant. The site has no notable constraints in respect of ownership or physical matters. A strategic road objective is located adjacent to the east which will serve to improve the site's accessibility from and connectivity with the surrounding area as well as increasing road capacity to accommodate residential development at this site. Meath Co. Co. are on site to complete advance works in respect of the R150 Spine Road.

The lands are considered Tier 1 '*ready to go*' serviced lands in the context of Appendix 3 of the National Planning Framework as they are already served by basic development services such as road and footpath access including lighting, drainage connectivity (foul and surface water systems) and water supply available. In this regard, the lands would constitute an appropriate sequential expansion of Bettystown as they are not dependent on any other landholding to enable development.

The lands are strategically located in terms of proximity to infrastructure and meet all the assessment criteria for zoning of lands according to proper planning and sustainable development as outlined in the Local Area Plan Guidelines.

We note that Meath Co. Co. are on site to complete advance works in respect of the R150 Spine Road. In this respect, the subject lands are ideally located to justify a zoning objective for residential use in the Meath County Development Plan 2019-2025. It is also noted that elsewhere within Bettystown substantial tracts of land are identified as comprising a flood risk.

These lands were previously zoned residential and changed to white zoning which set aside for longer term residential development. Our clients lands were considered to be the next best location previously, it is respectfully submitted, logically the next best site for residential zoning.

Figure 8: Map of Referenced Sites



Source: Google Maps

Current Status of Previously Evaluated Sites

1.1 Site 1 – Donacarney

- Ranked 5th with a score of 27 and is now de-zoned.
- LAP notes peripheral location as primary constraint.
- 0.7ha site capable of delivering 17.5 units.
- No notable change in status since 2014 evaluation.
- Considered Tier 1 Lands due to proximity to roads and drainage infrastructure serving adjacent residential development.

1.2 Site 2 – Bettystown (north)

- Ranked 6th with a score of 29 and is now de-zoned.
- LAP notes peripheral location as primary reason for de-zoning.
- 4.9ha site capable of delivering 122.5 units.
- Considered infill development due to the build out of the Castlemartin estate to the north and Carroll Estates to the south.
- Considered Tier 1 Lands due to proximity to roads and drainage infrastructure serving adjacent residential development.

1.3 Site 3 – Bettystown

- Ranked 3rd with a score of 21 is now zoned D1 Tourism due to presence of woodland and the protected structure of Betaghstown House.
- Notable constraints relative to proximity to schools and town centre as roads infrastructure.
- Not considered capable of delivering housing units at present due to current zoning.
- Unlikely to be reconsidered as housing land at present due to current zoning.
- Considered Tier 1 Lands due to infill location and proximity to existing service and infrastructure provision.

1.4 Site 4 – Bettystown (south)

- Ranked 2nd with a score of 17, now zoned for B1 Town Centre/Commercial and F1 Open Space and have been partially developed for hotel and retail use.
- Site recognised as being centrally located between town centre and educational campus. Not required to meet housing need but rezoned for commercial use.
- Not considered capable of delivering housing units at present due to current zoning.
- Unlikely to be reconsidered for residential as a primary land use due to current zoning.
- Considered Tier 1 Lands due to proximity to development adjacent to site and infrastructure serving this which can be extended.

1.5 Site 6 – Laytown (south west)

- Ranked joint 4th with a score of 24 and now partially zoned 'E2' for General Enterprise and Employment.
- Notable constraints relative to proximity to Bettystown town centre, environmental sites and not an ideal infill development.
- Not considered capable of delivering housing units at present due to current zoning.
- Unlikely to be reconsidered for housing due employment zoning.
- Considered Tier 2 Lands as pedestrian access as well as drainage infrastructure requires to be upgraded.

1.6 Subject Site 5 – Between Bettystown & Laytown

The subject site, extending to circa 16.9ha, forms part of the 21.5ha lands noted as site 5 in the above tables. This ranked 4th equal of the seven sites previously zoned 'A2' for residential use in the 2005 LAP. The A2 zoning was removed from the site and partially zoned as 'White Lands' and F1 'Open Space'. The LAP stated that the site was 'not required at present to meet the housing needs' of the LAP area. However, its White Lands zoning objective indicates the intentions of the Council for this site to come forward for development in future. Using the above table as a density guide, the 9.83ha part of the site zoned 'White Lands' site is considered capable of accommodating 246 units. There are no planning permissions on the lands at present.

In the context of the evaluation criteria used by the LAP, and the new NPF Tiered Approach to Land Zoning, our client's site is considered to now merit the following scores:

	Previous Score	Proposal Score on Review	Justification
Proximity to Bettystown Town Centre	2	2	Within 1.2km of town centre
Opportunity Site	3	1	Adjacent to existing residential area and new schools
Proximity to Environmental Sites	2	2	Circa 300m west of SAC with built up area occupying interim lands.
Proximity to Flood Risk Sites	3	1	No flooding issues at the subject lands, with flood zone located 250m north.
Proximity to Schools	1	1	Directly adjacent to two schools with a third primary school within 500m.
Serviced by Public Transport Corridor	3	2	Circa 350m from Laytown Road served by bus stops. Adjacent to planned strategic road objective. Circa 1.2m north of existing railway station. Circa 1.1km south east of planned railway station.
New Road/Junction Required	5	1	Land owner engaged with Meath County Council regarding delivery of new local distributor road adjacent to the site on 'G1' zoned lands for community infrastructure. Part 8 approval obtained now at enabling works stage.
Infill Opportunity	5	2	Site constitutes infill development as bordered by existing housing to the south, community infrastructure to the east and the defensive settlement boundary of the railway line to the west.
Total	24	12	Progress has been made in respect of the strategic distributor road which will enhance the connectivity of the subject lands. Site centrally located in relation to Bettystown and adjacent to schools, open space and local services. Retained within current LAP as 'White Lands' under zoning WL, indicating the planning authority's aspiration to promote appropriate development at the location in due course.
NPF Tiering Rank	N/A	1	There are basic development services available on adjacent lands which have the capacity to accommodate development to some extent at the boundary of the lands, as per the NPF definition.

The lands are a logical extension to neighbouring development, with capacity existing at the local waste water treatment plant. The site has no notable constraints in respect of ownership or physical matters. A strategic road objective is located adjacent to the east which will serve to improve the site's accessibility from and connectivity with the surrounding area as well as increasing road capacity to accommodate residential development at this site. Meath Co. Co. are on site to complete advance works in respect of the R150 Spine Road. In this respect, the subject lands are ideally located to justify a zoning objective for residential use in the Meath County Development Plan 2019-2025.

1.7 Site 7 - Bettystown

This site was retained within the current East Meath LAP for residential use. It previously held planning permission for 60 units, granted in 2003 (Reg. Ref.: 014158). This expired in 2008 without delivering all its committed units. The site extends to 3.1ha and currently has planning permission for 44 no. houses, parking, vehicular access from Eastham Road (Phase 1 - Roseville) and all associated site works (Reg. Ref.: LB/140907). This permission was granted with revised conditions by An Bord Pleanála on 9 December 2015, expiring on 8th December 2020.

Planning permission was granted on 3 October 2017 for the variation of two house types on site. An Bord Pleanála conditioned the removal of two units on site. The Planning Report noted that the site is currently under construction with ground works being carried out. In this respect, the site is expected to begin to deliver shortly.

The site retains its level of scoring in the summary table below and can be considered as Tier 1 Zoned Land as it is under construction with infrastructure and ground works being implemented at present. It constitutes infill development at a central location and is well placed to deliver the approved 44 units and should therefore be re-zoned as 'A1' in future plans.

It is noted that the LAP targets the delivery of an additional 80 units within Bettystown-Laytown-Mornington East during the plan period with Site 7 comprising 45 of these units. However, a remaining 35 units require to be identified beyond the planning permissions existing at present within the settlement boundary to ensure the LAP complies with the Core Strategy of the Meath County Development Plan 2013-2019.

1.8 Summary Table

The following updated table illustrates how the subject site scores against the other previously zoned lands following the above assessment and review. Site 7 has been excluded as it is expected to move into the A1 'Existing Residential' zoning in due course. Yields are added for site which currently hold no zoning or could be reconsidered in future to meet housing needs. Rezoned sites are not considered capable of delivering residential units in future due to alternative use development zoned at each.

Site Summary Table

Site Name	Subject Site Part of Site 5	1	2	3	4	6
Proximity to Bettystown Town Centre	2	5	3	3	1	4
Opportunity Site	1	5	3	5	5	3
Proximity to Environmental Sites	2	2	2	3	2	4
Proximity to Flood Risk Sites	1	3	3	2	3	3
Proximity to Schools	1	3	3	3	1	2
Serviced by Public Transport Corridor	2	1	3	1	1	1
New Road/Junction Required	1	3	3	3	5	2
Infill Opportunity	2	5	2	3	3	5
Total	12	27	22	23	21	24
NPF Tiering	1	1	1	1	1	2
Potential Units Yield	246	17.5	122.5	0	0	0
Rank	1	6	3	4	2	5

Currently Zoned Residential Sites & Progress**1.9 Site A – Sevitsland, Bettystown**

The site currently holds planning permission for 140 units, originally secured under reference SA/60371 in January 2007. A 5-year extension of this permission was granted in April 2012 until 28th March 2017 (now expired) and the development, comprising a mix of 9 no. bungalows, 72 no. apartments, 1 no. detached, 12 no. semi-detached and 46 terraced units is largely complete.

1.10 Site B – Narroways Road

This site lies immediately east of the above Site A and comprises two plots of land totaling circa 4.6ha. Permission was granted for the development of 113 units comprised of a range of 2 and 3 storey houses, duplexes and apartment blocks incorporating terraces and associated works. The original permission (Ref.: SA/60514) was granted in March 2007. A 5-year extension to this permission running until 19th September 2017 was permitted in 2012 and is now expired.

The current LAP notes that no development had been carried out to 2014; however, residential development has been carried out on the eastern segment of the site in the interim, alongside a playground on the corner of Betaghstown Wood and Narroways. It is anticipated that the site possesses a balance of approximately 70 units to be delivered.

1.11 Site C – Bettystown (north) Donacarney

This site extends to 17ha and comprises a significant extension to the north west of Bettystown. It is zoned 'A2' within the current LAP and possesses planning permission for 376 no. dwellings, creche, shops and roads infrastructure under Ref.: SA50491. The application was subject to a third party appeal and the unit numbers reduced by 10 to 366 before An Bord Pleanala granted permission in January 2007. Application SA111050 extended the duration of the permission on 13th January 2012 until 30th January 2017. This permission has now expired.

Mycete Homes secured permission for the balance of 267 units under Ref: LB151268 on 19th August 2016, with permission due to expire on 18th August 2021. The central part of the site is built out and is known as Whitefield Manor at Bettystown Cross. The area of the site west of the Donacarne Road has completed 158 units and the remaining 218 units located on the balance of the site to the east of the R150 is currently under construction. This may be built out to adjoin the existing development at Wellesley Manor.

1.12 Site D – Carroll Estates

This site was granted permission on 27th February 2009 for 370 dwellings of various types, a retail/commercial neighbourhood centre, creche and distributor road ultimately linking with the Donacarne Road, under reference SA802128. This was granted an extension of permission under Ref: SA130733 on 11th November 2013 until 18th December 2018. The parent consent has been subject to a number of amendments relative to different areas of the wider site, leading to varied total dwelling numbers.

Unit numbers at 'Site C' have been reduced to 88 under application reference SA120620. This is now under construction as 'Cois Na Mara' with permission due expired 18th February 2018.

An application for the construction of 65 dwellings occupying 'Site A' of the parent permission SA802128 was granted in September 2017 (Ref.:LB170428), expiring on 13th September 2022. Taken together, this equates to a total of 153 units currently under construction at the site, with a remaining balance on Site B and Site D to the south comprising circa 110 units.

1.13 Site E – North East of Castlemartin

The site currently holds planning permission for 213 residential units and local centre to be delivered in two phases. Construction has now begun on the 120 units comprising Phase 1 of the development known as 'Dun Eimear' which was approved under reference SA803341 and extended under application SA130855 until 16th December 2018. Permission for 95 units at Phase 2 was extended permission under reference LB161084 until 16th December 2018 and is now also under construction.