



# Meath County Development Plan 2021-2027

## BOOK 1

Introduction, Key Strategic Submissions and Group Submissions

Draft Meath County Development Plan

Chief Executive's Report

13<sup>th</sup> August, 2020



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## Part One

An explanation of the legislative requirements for the making of the new development plan and Chief Executive's Report, a description of the Consultation process and an overview of the issues raised.

### Purpose and Contents of the Chief Executive's Report

The purpose of the Chief Executive's Report is to report on the outcome of the consultation process on the new Draft Meath Development Plan, set out the Chief Executive's response to the issues raised in the submissions, and to make recommendations on changes to the Draft Plan. The report forms part of the statutory procedure for the preparation of a new Development Plan.

Under Section 12 (4)(a) of the Planning and Development Act 2000 (as amended) the Chief Executive is required to prepare a report on any submissions and observations received and submit the report to the Members of the authority for their consideration. The report is required to (i) list the persons or bodies who made the submissions or observations, (ii) summarise the issues raised by the persons or bodies who made submissions or observations, and (iii) give the response by the Chief Executive to the issues raised taking account of any direction of the Members of the authority, the proper planning and sustainable development of the area, the statutory obligations of the authority and any relevant policies or objectives of the Government or of any Minister of the Government.

**Book 1** of this report consists of a description of the structure of the report, the process and next steps in making the new Meath Development Plan, and a report on the consultation undertaken for the Draft Plan which resulted in 2452 no. submissions during the second statutory public consultation stage (Stage 2) Two submissions were subsequently withdrawn by their submitters, MH-C5-159 and MH-C5-749.

**Books 2, 3 and 4** covers an analysis of the submissions received relevant to each volume and chapter as displayed in the Draft Plan, followed by the Chief Executive's opinion on these issues and recommendations. **Book 2** contains submissions made in relation to Chapters 1 to 11 of Volume 1 of the Draft Plan (See Page 5 which details the relevant Chapters). **Books 3 and 4** contain submissions made in relation to all settlements contained in Volume 2 of the Draft Plan.

Editorial changes and updating of the Draft Plan will be carried out. These changes will be placed in Appendix H – Errata.

**Book 5** outlines Eight Appendices as outlined below;

Appendix A: List of Submissions

Appendix B: List of Prescribed Bodies

Appendix C: Development Plan Timeline

Appendix D: Appendix 8(a) UNESCO World Heritage Site (Omitted from public display of draft in error)

Appendix E: Map of Yellow Furze Rural Node (Omitted from public display of draft in error)

Appendix F: Rural Housing Policy

Appendix G: Chapter 11 – Development Management Chapter Simplified

Appendix H: Errata (editorial changes and updating of the Draft Plan only)

### Legislative Background for the Meath Development Plan 2021-2027

The prescribed process for a County Development Plan is set out in the Planning and Development Act 2000 (as amended). It gives a ninety-nine week\* period for adoption of the Plan. The timetable for the preparation of the Meath Development Plan 2021-2027 is outlined in Appendix C.

The Planning and Development Act 2000 sets out mandatory objectives which must be included in a Development Plan. These include, inter alia, objectives for the zoning of land, the provision of infrastructure, the conservation and protection of the environment, and the integration of the planning and sustainable development of the area with the social, community and cultural requirements of the area and its population. Other non-mandatory objectives are also referred to in the Planning Act. There is also a requirement for a Strategic Environmental Assessment and Appropriate Assessment, Climate Change assessment of the new Development Plan.

In accordance with Article 13A of the Planning and Development (Strategic Environmental Assessment) Regulations 2004 (S.I. 436 of 2004), the Council must carry out a Strategic Environmental Assessment (SEA) before the Plan may be adopted. The SEA is an integral part in the development of the Plan.

A Strategic Flood Risk Assessment (SFRA) was undertaken for the plan area having regard to the Ministerial planning guidelines on The Planning System and Flood Risk Management. Flood Risk assessment has integrated into the SEA process. The Strategic Flood Risk Assessment has been published as a separate document in conjunction with the Draft Plan.

In accordance with European and National legislation, the Council carried out a Strategic Environmental Assessment (SEA) and an Appropriate Assessment (AA) under the Habitats Directive, which informed the preparation of this Draft Plan. These assessments are undertaken so the impact of the proposed Draft Plan objectives on the environment can be evaluated and used to inform the direction

of the Draft Plan to ensure that our built environment responds to the sensitivities and requirements of the wider national environment.

Ministerial Guidelines issued to Planning Authorities regarding their functions under the Planning Acts have been considered in the making of this Plan and have been implemented in the various chapters, in accordance with Section 28 of the Planning and Development Act 2000 (as amended).

### **Form and Contents of the Draft Meath Development Plan 2021-2027**

The Draft Development Plan consists of a Written Statement, Appendices, Maps and Accompanying Documents.

The Draft Plan is divided into 11 separate chapters, listed below, with Chapters 1 to 3 setting out the vision, strategic context, aims, goals and the settlement and core strategies for the County. Chapters 4 to 10 set out the policies, objectives and actions required under a range of topics including economic development, infrastructure and movement, rural development community, cultural and natural heritage and climate change. Chapter 11 sets out the land use zoning policies and development management standards for the County. The accompanying documents comprise the SEA, NIR and SFRA.

#### **Volume 1**

- Chapter 1: Introduction
- Chapter 2: Core Strategy
- Chapter 3: Settlement and Housing Strategy
- Chapter 4: Economy and Employment Strategy
- Chapter 5: Movement Strategy
- Chapter 6: Infrastructure Strategy
- Chapter 7: Community Building Strategy
- Chapter 8: Cultural and Natural Heritage Strategy
- Chapter 9: Rural Development Strategy
- Chapter 10: Climate Change Strategy
- Chapter 11: Development Management Standards and Land Use Zoning Objectives

#### **Volume 2**

Written Statements and maps for Settlements

#### **Volume 3**

Book of Maps

#### **Volume 4**

Environmental Assessments SEA, AA & SFRA

#### **Appendices**

- Appendix 1: Development Plan Mandatory Objectives
- Appendix 2: Strategic Policy and Guidance and Legislation
- Appendix 3: Meath Housing Strategy

- Appendix 4: Retail Strategy
- Appendix 5: Landscape Character Assessment
- Appendix 6: Record of Protected Structures
- Appendix 7: Architectural Conservation Areas
- Appendix 8: UNESCO World Heritage Site and Brú na Bóinne Management Plan
- Appendix 9: National Monuments in State Care & Register of Historic Monuments
- Appendix 10: Protected Views and Prospects
- Appendix 11: Sites Designated or Nature Conservation and County Geological Sites
- Appendix 12: Public Rights of Way
- Appendix 13: Rural Design Guide
- Appendix 14: Statement outlining compliance with Ministerial Guidelines
- Appendix 15: Implementation and Monitoring

### Preliminary Consultation Process: Pre Draft Plan

The preliminary consultation process, the Pre-Draft consultation stage, ran from the 14<sup>th</sup> December 2016 to the 17<sup>th</sup> February, 2017.

A number of public information meetings were held during the consultation period as follows;

Date	Municipal District	Venue
Monday 30 <sup>th</sup> January, 5pm to 7pm	Kells	Kells Civic Offices, Headfort Place, Kells, A82 W2R3
Tuesday 31 <sup>st</sup> January, 5pm to 7pm	Ashbourne	Ashbourne Civic Offices, 1-2 Killegland Square Upper, Killegland Street, Ashbourne, A84 NY73
Wednesday 1 <sup>st</sup> February, 5pm to 7pm	Trim	Trim Library, High Street, Trim, C15 P668
Wednesday 1 <sup>st</sup> February, 5pm to 7pm	Laytown/Bettystown	Duleek Civic Offices, Main Street. Duleek, A92 R9KW
Thursday 2 <sup>nd</sup> February, 5pm to 7pm	Ratoath	Dunshaughlin Civic Offices, Drumree Road, Dunshaughlin, A85 XK20
Friday 3 <sup>rd</sup> February, 5pm to 7pm	Navan	Planning Department, Buvinda House, Dublin Road, Navan, C15 Y291

The Chief Executive's Report: Pre-Draft Consultation was issued to the elected members on 5<sup>th</sup> April, 2017. The Report was considered at Council Meetings held on 24<sup>th</sup> April, 2017 and the elected members directed the Chief Executive to prepare the Draft Development Plan.

The Chief Executive's Draft Plan was subsequently prepared and considered by elected members at a meeting held on 12<sup>th</sup> November, 2019. Following the meeting the Draft Plan was duly prepared and the current Stage 2, of public consultation began on 18<sup>th</sup> December, 2019

### Current Consultation Process: Draft Plan and Next Stages

The Planning and Development Act 2000 (as amended) requires that the Draft Plan is put on display for not less than 10 weeks. The Stage 2 Draft Plan consultation period ran from 18<sup>th</sup> December, 2019 to the 6<sup>th</sup> March, 2020. Details are as follows:

Press: On 18<sup>th</sup> December, 2019 an advertisement was placed in the Irish Independent newspaper announcing that a Draft Meath Development Plan had been prepared for the County. This was also published in the Meath Chronicle dated 21<sup>st</sup> December, 2019 but available on 17<sup>th</sup> December and the Drogheda Independent on 17<sup>th</sup> December, 2019.

A press release was also sent to LMFm Radio giving details of the commencement of the Development Plan process. The press release also encouraged people to the dedicated website for further information.

The Draft Plan was placed on display at the Meath County Council Offices Buvinda House, Dublin Road, Navan, Co. Meath C15 Y291 and the Municipal District Offices of, Ashbourne, Kells, Laytown/Bettystown and Trim. The Draft Plan was also displayed at the following Meath public libraries: Ashbourne, Athboy, Duleek, Dunboyne, Dunshaughin, Kells, Leabharlann Ráth Chairn, Meath County Library (Navan), Nobber, Oldcastle, Slane and Trim

Details of the Development Plan review, the Draft Plan together with other relevant documents were also placed on the Council Website, [www.meath.ie](http://www.meath.ie), the Plan's dedicated website, [www.consult.meath.ie](http://www.consult.meath.ie) where submissions could be made online, on the Public Participation Network's website at [www.meathppn.ie](http://www.meathppn.ie) During the public consultation process the Council also used social media, specifically Facebook and Twitter, to share information and raise the profile of the Draft Plan In addition a dedicated website was set up which allowed users to register for regular updates on the process;  
[www.countydevelopmentplanreview.ie](http://www.countydevelopmentplanreview.ie)

During the consultation period there were in excess of 108,720 page views, 43,768 sessions and 37,797 users who initiated one session on [www.consult.meath.ie](http://www.consult.meath.ie) . On [www.countydevelopmentplanreview.ie](http://www.countydevelopmentplanreview.ie) there were a total of 29,778 page views. There was also regular activity on Facebook and Twitter.

There were 2452 no. submissions received during this public consultation period, 782 no. submissions received made online on [www.consult.meath.ie](http://www.consult.meath.ie) and 1670

no. submissions were received by post / by hand. Only submissions made via the online portal or by hardcopy within the timeframe were accepted. All valid submissions received have been considered in the preparation of this CE report.

The Council wishes to express its appreciation to those who made submissions and the large number of submissions and observations received highlights the significant level of public interest in the plan-making process.

Not later than 22 weeks after the notice of the Draft going on display, the Chief Executive is required to produce a report listing the submissions, summarising the issues raised, preparing responses and making recommendations.

### Next Stages

Under Section 12 (5) of the Act, following receipt of this Chief Executive's Report and revised Draft, the members are required to consider the Draft and the Chief Executive's Report. Such consideration must be completed within 12 weeks, within which the members may amend and accept the Draft. Material alterations made must go on public display, under Section 12 (7).

Following consideration of the Draft Development Plan and Chief Executive's Report with associated proposed Chief Executive's amendments, Members may then accept the Draft Plan without material amendments and make the Development Plan. Should amendments be accepted which would constitute material alterations to the Draft Plan, there is a further public display period giving people an opportunity to comment on the proposed amendments **only**. This is followed by the preparation of a Chief Executive's Report for members on any submissions or observations received on the proposed amendments.

Members may then make the Development Plan with or without the proposed amendments or with modifications to the proposed amendments as they consider appropriate.

### Approach to Consideration of Submissions

Following the initial recording and scanning of all submissions, each submission was read first to allocate the issues raised to the appropriate sheets and chapters of the Development Plan. Some submissions received included issues not relevant to the Development Plan, and in some cases not relevant to planning generally or local authority operations and such points cannot be included in the Chief Executive's report. Listed below are the numbers of submissions received relating to the individual sheets or the text. The total numbers listed below exceeds the overall number of submissions, reflecting the high number of submissions that raised more than one issue or policies for one area.

### Legislation leading to the pausing of County Development Plan timelines on two occasions.

\* Following the enactment of the **Planning and Development (Amendment) Act 2018**, which contained a provision requiring Planning Authorities to pause the



statutory development plan review process, where in progress, in order to align future plans with the soon to be published Regional Spatial and Economic Strategy (RSES), Meath County Council paused the statutory timeframes from 1<sup>st</sup> August 2018, to 8<sup>th</sup> May, 2019.

A further pausing of the timeframes occurred from 29<sup>th</sup> March, 2020 to 23<sup>rd</sup> May, 2020 inclusive, in response to the enactment of the **Emergency Measures in the Public Interest (Covid 19) Act 2020**.

This report is submitted to you for your consideration

A handwritten signature in black ink that reads "Saehie Maguire". The signature is written in a cursive style with a large, looped 'G' at the end.

**Chief Executive**

## 2.1 Key Strategic Submissions

<b>Submission No.:</b>	MH-C5-816
<b>Submitted by:</b>	Office of the Planning Regulator
<b>Submission Theme(s):</b>	Chapter 2 Core Strategy, Chapter 3 Settlement and Housing Strategy, Chapter 5 Movement Strategy, Chapter 6 Infrastructure Strategy, Chapter 9 Rural Development Strategy, Chapter 10 Climate Change Strategy, Chapter 11 Development Management Standards and Land Use Zoning Objectives
<b>Summary of Submission:</b>	
<p>The Chief Executive welcomes the submission by the Office of the Planning Regulator (OPR) and notes the acknowledgement of the considerable and evident work Meath County Council has put into the preparation of the Draft Plan against the backdrop of an evolving national and regional planning policy and regulatory context which included taking account of the National Planning Framework (NPF), the Regional and Spatial Economic Strategy) RSES for the (Eastern Midland and Regional Assembly) EMRA and establishment of the office of the OPR in the gestation of the Draft Plan. The Chief Executives notes the comments and positive support for the Draft County Development Plan 2021-2026 by the OPR <i>“In particular, the Office notes and welcomes the overall approach of your authority in the preparation of the Draft Plan and in addressing the NPF and the RSES in accordance with Section 12 of the Planning and development Act 2000, as amended (the Act)”</i>. The issues raised within this submission shall be responded to in the same format in which they appear.</p> <p><b>Observation 1</b> requests that an objective is included to ensure that a detailed assessment of the development plan is undertaken incorporating the requirements of the Updated Development Plan Guidelines for Planning Authorities once they are published, particularly in relation to the provisions of Section 10(2)(n) of the Planning and Development Act 2000, as amended which require proposals in relation to Climate Action to be included as part of a development plan.</p> <p><b>Observation 2</b> requests that Meath County Council reconsider the order in which transport modes are considered in the Movement Strategy, consistent with the recommended road user priorities, in order to more clearly demonstrate the priority given to sustainable active modes (walking and cycling modes) and other sustainable passive modes (mass transit modes, including rail and bus).</p> <p><b>Observation 3</b> requests that Meath County Council amend references noting that DMURS will be <i>“taken into account”</i> and replace it with the requirement for planning authorities to implement the principles of DMURS.</p>	

**Recommendation 1** Requests that appropriate existing baseline figures for modal share be included for each settlement as well as the provision of realistic targets for these settlements as part of the Movement Strategy.

**Recommendation 2** Requests that Meath County Council provides information showing that the Draft Plan and housing strategy are consistent with the specific planning policy requirements (SPPRs) specified in Ministerial Guidelines.

**Recommendation 3** requests that Meath County Council provide the quantity in hectares and the proposed number of housing units in respect of existing residential zoned land and land zoned for a mix of residential and other uses in accordance with section 10(2A)(c) of the Planning and Development Act 2000, as amended.

**Recommendation 4** requests that Meath County Council demonstrate that objectives relating to the order or priority of development (or phasing) of lands accords with the principle of the sequential approach contained in the statutory guidelines published by the Minister on Development Plans (2007). This should include proposals to ensure lands in sequentially favourable locations are prioritised over the period of the Draft Plan.

**Recommendation 5** requests that Meath County Council clarify the wording of objectives CS OB 7 and SH OBJ 4 to clarify that no residential proposals will be considered on 'Post 2026' lands during the lifetime of the Draft Plan.

**Recommendation 6** relates to the provisions of the legislation concerning the core strategy under section 10(2A)(f)(vi) of the Planning and Development Act 2000, as amended, and Meath County Council is requested to include Ballivor and Longwood as small towns and revisit the approach to settlements less than 1,500 persons.

**Observation 4** requests that Meath County Council reconsider the designation of Ashbourne as a self-sustaining growth town due to its low employment base and the provisions of RPO 4.1 of the RSES.

**Observation 5** advises that Meath County Council omits reference in the Draft Plan to Ashbourne transitioning to a metropolitan settlement due to this being inconsistent with the provisions of the RSES.

**Recommendation 7** requests that Meath County Council address the requirements of NPO9 outlined in the NPF particularly as Dunshaughlin and Dunboyne are projected to grow by 54% and 45%, respectively, to 2026, whereas NPO9 only provides for 30% growth in such towns.

**Recommendation 8** requests Meath County Council to demonstrate how high % growth assumptions for villages under the Core Strategy are consistent with the likely availability of physical and social infrastructure and services within the plan period, NPO7 and NPO9 of the NPF should be considered in this regard.

**Observation 6** notes that Meath County Council should include an objective to implement the Active Land Management Strategy approach and set out a clear time line and strategic approach to carrying out the Active Land Management approach and to set measurable targets.

**Recommendation 9** requests Meath County Council to provide more clarity on the basis for occupancy rate applied in the devising of your Core Strategy, as detailed in table 2.12. Meath County Council is also requested to justify the approach applied in

the devising the core strategy and the housing demand figures as well as revising the quantum of land zoned for residential use and for a mixture of residential and other uses, should there be any changes as noted above.

**Recommendation 10** requests that Meath County Council submit the size of the area in hectares inclusive of lands proposed to be zoned for residential and for a mixture of residential and other uses, as required under section 10(2A)(d) of the Planning and Development Act 2000, as amended, in addition to the area of any land already so zoned as required under section 10(2A)(c).

**Observation 7** seeks that Meath County Council clarify the quantum of lands that area zoned in table 2.12.

**Recommendation 11** notes that Meath County Council should consider the following:

- a. consult with the relevant infrastructure and services providers, regarding capacity constraints for settlements and the availability of services on specific proposed zoned lands, or the realistic potential to provide (and cost of providing) services to specific proposed zoned lands, with a particular emphasis on water services.
- b. This should be followed by the application of a phased approach to development of lands within the settlement over the period of the plan, prioritising lands that are more favourably located sequentially.
- c. The overall quantum of lands zoned for residential and for mixed residential and other uses in its settlements.

**Recommendation 12** requests that Meath County Council review the wording of the Draft Plan, including section 5.7.1 Rail, in order to appropriately amend any references which inadvertently and incorrectly refer to the original wording of the RSES subsequently amended by the Minister, through a Ministerial Direction issued by the Minister in relation to the RSES made on the 28<sup>th</sup> June 2019.

**Observation 8** advises Meath County Council to omit references to and objectives relating to the investigation of the feasibility of a spur rail line to Ratoath and Ashbourne.

**Observation 9** advises that Meath County Council include an objective or amend existing objectives so as to prioritise the preparation of the Joint UAP for Drogheda and the Joint LAP Maynooth ahead of any other LAPs, setting out target dates for commencement of the process and for the eventual making of the said joint plans.

**Recommendation 13** notes that Meath County Council should amend Volume 3, Book of Maps to indicate the land use zoning objectives and other relevant objectives of the adjoining Planning Authority.

**Observation 10** indicates that no Written Statement has been provided in Volume 2 in relation to the settlement of Mornington/Mornington East/Bettystown/Laytown. It is noted that the approach to this settlement should be considered through inclusion of an objective or alternatively through a future variation to the Draft Plan within a reasonable timeframe.

**Recommendation 14** highlights the inconsistency between objective RA OBJ 2 (Master Plan 1) and the land use zoning objective the for subject site as 'White Land'. It is requested that this objective be amended to only refer to the lands proposed to be zoned D1 - Tourism.

**Observation 11** advises that Meath County Council should amend the wording of objective MOV OBJ 1 in order to provide an order of priority among the settlements

specified in the objective in relation to the sequence of preparation of local transport plans and provide expected timelines for the implementation of same.

**Recommendation 15** requests that Meath County Council includes criteria for the designation of locations as a rural node and exclude rural villages to which NPO16 (and RPO 4.77, RPO 4.83) and NPO18a (and RPO 4.78) would apply and to which the application of the restrictions under proposed policy RUR POL 15 may not be appropriate.

**Observation 12** notes that Meath County Council should facilitate the appropriate range of densities recommended in the Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities (2012), issued by the Minister under section 28 of the Act, with reference to relevant safeguards.

**Recommendation 16** requests that Meath County Council amend objective DM OBJ 61 to ensure consistency with the Design Standards for New Apartments, and specifically with the provisions of SPPR 4 concerning dual aspect units.

**Recommendation 17** requests Meath County Council to ensure that proposed limits on residential density in relevant urban settlements are consistent with the provisions SPPR1 of the Urban Development and Building Height Guidelines for Planning Authorities (2018).

**Observation 13** advises Meath County Council to consult with TII regarding the determination of the potential impact on the capacity of the strategic national road network arising from proposals for junction 7 of the M1 (including any implications arising from the core strategy for Stamullen) and the land use zoning proposals for Drogheda.

### Chief Executive's Response

The Chief Executive recognises the important function and key role that the OPR plays in the Planning Process in Ireland. It is noted that one of the key functions of the Office is the assessment of statutory plans and strategies. This section will address the key issues raised in the OPR submission and include recommendations for change, where considered appropriate. As stated the outset, each issue will be considered sequentially as laid out in the OPR submission in terms of both observations and recommendations.

**Observation 1:** This observation has been fully considered and it is noted that climate change has been an overarching and integral part of the preparation of the Draft Plan. Chapter 10 of the Draft CDP, Climate Change Strategy, specifically addresses the issues and stipulates in some detail how it has been incorporated into Draft Plan. The Planning Authority commissioned bespoke top of the range expertise and advice in this evolving critical aspect of the Development Plan making process. The Drafting of the Climate Change Chapter was carried out by WSP Consultants to ensure it was embedded and an overarching concept within the Draft Plan. The policies and objectives were in turn professionally proofed to ensure adherence to same. Climate Change is also a central theme in each of the Chapters of the Draft Plan e.g. CS OBJ 13.

In particular, as part of the preparation of the Draft Plan consultants WSP were required to guide and advise on how best climate change issues and measures could be embedded in the plan making process in order that same would be reflected in the Draft Plan, as published. When considering climate change as well as the proper planning and sustainable development of the county, it was considered necessary that significant de-zoning as well as re-zoning was required as part of the development strategy due to the excessive quantum of land that was zoned for residential development in the current County Meath Development Plan (as amended). In this regard, c.319 hectares of land have been de-zoned or re-zoned as part of the preparation of the Draft Plan when compared to the current CDP. This approach combined with the proposed 'live-work' community model outlined as part of CS OBJ 16 in the Draft Plan, has the potential to reduce the reliance on commuting, as well as having positive impacts on Meath County Council's climate actions over the coming years. The OPR noted that the Draft Plan is largely consistent with the provisions of the National Planning Framework as well as the relevant Regional Spatial and Economic Strategy for the area which endorses the overall approach of Meath County Council in terms of the settlement framework and development strategy. The Draft Plan also includes significant new provisions in relation to the Rural Development Strategy in order to comply with NPF and RSES. It is considered that the proposed Rural Development Strategy (endorsed by the OPR) will ensure a more sustainable approach to the development of rural areas and this is a positive approach towards climate action measures. It is also noted that a key focus of the Draft Plan is to prioritise public transport, walking and cycling and to improve the modal split within the County. This includes commitments to the provision of additional public transport infrastructure including the electrification of the existing Drogheda and Maynooth lines under DART + together with the future provision of the Navan Rail line which is consistent with the proposals of Irish Rail.

Meath County Council also continue to work positively with the Eastern and Midland Regional Assembly (hereafter EMRA) as part of the regional climate action group.

The Draft Plan has been prepared in line with the most up to date Development Plan Guidelines and remain committed to climate change and the implementation of the appropriate policies responses. It is proposed that a new objective will be included in the Draft Plan to ensure that the 2 year CDP review will be guided by the Updated Development Plan Guidelines for Planning Authorities.

**Observation 2:** In accordance with the recommendation of the OPR, the category of movement as set out in Chapter 5 of the Draft Plan will be re-structured to reflect a hierarchy of sustainable transport modes. The re-ordering of Chapter 5 will take the following structure: Walking, Cycling, Rail, Bus, Park & Ride, Taxi, Electric Vehicles and Roads Infrastructure.

**Observation 3:** The Chief Executive acknowledges and fully accepts the importance of the Design Manual for Urban Roads and Streets (2019), the role of encouraging more sustainable travel patterns and agrees with the recommendation to strengthen the wording in Chapter 5 Movement Strategy regarding the implementation of DMURS.

**Recommendation 1:** Meath County Council and the Transportation Department have worked collaboratively with the NTA to secure baseline figures of modal splits in the larger towns of Drogheda, Ashbourne, Dunshaughlin, Dunboyne, Ratoath, Navan and Kells. Having due regard to variables such as funding and resources, Meath County Council have set targets for modal change in these towns where it is hoped they will be achieved within the lifetime of the Plan.

These figures are presented in Volume 2 of the Draft Plan under their respective Written Statements and will inform the preparation on of each Local Transport Plans for the respective settlements.

**Recommendation 2:** The Chief Executive welcomes the statement by the OPR wherein it is stated that *“The Office is generally satisfied that the Core Strategy and settlement strategy broadly responds to the requirements of the legislation under section 10 (2A)”* This is very encouraging as the remaining recommendations and observations on same, are relatively straight forward and can be adequately addressed through appropriate amendments to the Draft Plan.

This recommendation has been considered and further details of how the Draft Plan, complies with Section 10 (2A)(a) of the Planning and Development Act 2000, as amended. In this regard, the requirements of the relevant Ministerial Guidelines will be incorporated into the Plan.

**Recommendation 3:** The Planning Authority agrees with the issues raised within the submission. It is of relevance to this section and issues contained therein, that due to the planning timeline extensions related to Covid-19; together with the delay in the formation and drafting of the RSES for the EMRA region, it was considered both appropriate and necessary to update the timeline for delivery of the Draft Plan. Given that the Draft CDP is only now projected to be adopted in April 2021, the revised and updated Draft Plan will cover the period 2021-2027. Consequently, it has been necessary to factor in an additional year into the metrics of the Core Strategy. It is important to note that an additional population of only 800 persons has been added into the Core Strategy Table and that no additional zoning has been added to any settlement as a result of the above chronological change. This additional population has been focused on Navan due to its role as the County Town and a designated key Town in the RSES. The details are reflected in Table 2.11 as well as the provision of relevant textual changes to Chapter 2 Core Strategy of the Draft Plan. The Housing Strategy has not been updated due in part to the continued absence of specific guidance related to HNDA. In the interim and to reflect



this change to the Core Strategy, an new objective will be included to note that a revised Housing Strategy will be prepared during the lifetime of the plan to outline the housing requirements for 2027. This update will also be accompanied by a Housing Needs Demand Assessment which will be developed once Section 28 Guidance are published for Local Authorities on same. It is likely that a variation to the Meath CDP will be required during the life time of the plan under Section 13 of the Planning and Development Act 2000, as amended.

Given the specific issues raised in this and other submissions regarding Core Strategy, Meath County Council have reviewed and updated given inter alia timelines, the research that was undertaken as part of the preparation of the Draft Plan. It is noteworthy that the yield from mixed use developments over the existing plan period is relatively small at approximately 128 units over the plan period and therefore, it is not anticipated that the quantum of lands zoned mixed use as part of the Draft Plan will lead to a significantly higher yield of housing outside of that provided for in the core strategy. An assessment of the existing residential lands in the 2013-2019 County Development Plan provide a yield from the existing residential lands of c.949 units. It is considered that the delivery of residential units on lands zoned existing residential will be low as development will be restricted to backlands and gap sites in existing residential areas and the specific new requirement that such development shall protect and be sympathetic with the established character of the residential area. In this regard the allocation of housing units and land use zoning is consistent with the likely delivery of units across settlements in County Meath. The expected low yield of housing being delivered on mixed use lands is due to a number of factors. In many settlements in County Meath, there are lands identified as mixed use and this is largely reflective of the existing use of the site. As such, it is unlikely that many of these sites will be redeveloped in the short-term that would deliver any significant residential yield. An example of this is Parc Tailteann in Navan which was and is currently zoned mixed use to accommodate its redevelopment. No residential units will be delivered as part of the redevelopment proposals recently granted planning permission. The mix of uses will include ancillary services such as restaurants and coffee shops together with comparison goods like sports and clothing. In other relevant cases, mixed-use lands form part of a strategic landbank and as such it is not expected that there would be a substantial quantum of residential units delivered on such lands during the lifetime of the Draft Plan. It is also a consideration that not all of the units which are granted permission are delivered and this formed part of the early analysis and evaluation in the preparation of the Core and Settlement Strategy in the Draft CDP. Mixed use sites by their nature in smaller towns, do not attract the same type of investor due to the financial risk of providing the range of uses on such lands and therefore are not as attractive to invest in and deliver units on. It is therefore the demonstrable evidence base and experience of Meath County Council that the priority for developers is generally the development of new residential lands over mixed-use lands. Market forces could seem to dictate that such an approach reduces the risk of unpredictable issues arising for developers and it is thus likely to provide a better return on investment, particularly in the short-term. Also, given the experiences of the so called

Celtic Tiger years and the current unknown effects of a potential recession from the Covid-19 pandemic, it is the view of the Chief Executive that the above trends will continue and the substantive delivery of residential units will be A2 residential zoned lands during the lifetime of the Draft Plan.

Finally, it should be noted that it is proposed to change the land use zoning of a number of mixed-use sites as part of the Chief Executive's report and this will reduce potential residential yields further which will ensure compliance with Core Strategy, RSES and NPF. The potential yields outlined as part of the updated Core Strategy Chapter and the quantum of existing and mixed use zoned lands will be outlined in Table 2.11.

**Recommendation 4:** As outlined under recommendation 3 above, the Draft Plan period has been extended to cover the period 2021-2027 due to the development of the RSES for EMRA Region and the pause in planning timelines during the current Covid 19 pandemic. As part of the preparation of the Core Strategy, it was decided that the quantum of residential lands zoned would reflect the quantity of units likely to be needed and required over the plan period and these were detailed in Table 2.11. Ireland currently faces another potential economic crisis due to the aforementioned Covid 19 pandemic and therefore it is likely that significant uncertainty will continue in the national housing market with particular reference to housing supply and affordability and consequently many residential zoned land banks will not be delivered. An unprecedented 319 hectares of zoned housing lands have been dezoned in the Draft Plan. This has been a significant undertaking in terms of identifying which lands should be dezoned or rezoned and in what locations and settlements. The existing Draft Plan (and subsequent amendments of Core Strategy figures and zoned residential lands) represents the most appropriate balance between compliance with NPF and RSES and actually meeting potential housing demand over the plan period. Consequently, it has not been considered appropriate to apply a further order of priority in relation to the zoning of residential lands in various settlements. Meath County Council will facilitate and operate a sequential approach to housing development and ensure consistency throughout the settlement framework and relevant policies and objectives of same.

It is considered appropriate to utilise the Active Land Management Strategy and the Vacant Site Register as an appropriate best practice mechanisms, to encourage the delivery of sequentially preferable sites. Such mechanisms will be utilised to operate an Order of Priority in the primary settlements of County Meath. Similar information and undertakings are already outlined as part of Section 3.6 of the Draft Plan.

As part of Rebuilding Ireland, there is an expectation that dwelling units will be delivered in appropriate locations. The settlement framework in the Draft Plan will facilitate appropriate residential development through existing policies such as SH POL 1 and SH POL 2. This will ensure that Meath County Council fulfils its requirements under Section 95(1)(a) of Planning and Development Act 2000, as amended, which notes that the

Planning Authority is responsible for ensuring there is not a scarcity of land available for the delivery and development of housing. Given the critical importance of housing from a national perspective, it is considered that the Draft Plan has adequately addressed the land requirements for housing and as such no further change is required in relation to this matter outside of detailed proposals outlined earlier in this response.

**Recommendation 5:** The Chief Executive confirms that lands zoned for strategic residential reserve are zoned as such for appropriate and planned reasons. Such lands are zoned post 2027 to ensure a long term strategic land bank for the future development of the relevant higher order settlements in County Meath. In order to ensure this recommendation is met, the wording of objectives CS OBJ 7 & SH OBJ 4 will be amended to clarify that the lands identified 'Post 2027' residential development will 'not be available for residential development during the lifetime of this Development Plan. Furthermore, compliance with the terms of such objectives set out above will stipulate that no permission for dwellings will be granted on such lands by Meath County Council' It is considered that this approach and amendments should clarify that it is not intended to release the Phase II lands during the lifetime of the Draft Plan.

**Recommendation 6:** On the basis of the issues raised, Ballivor and Longwood will be included as small towns in line with Section 10(2A)(f)(vi) of the Planning and Development Act 2000, as amended. This change will be reflected in both Table 2.11 of Chapter 2, Core Strategy as well as Table 3.4 of the Settlement and Housing Strategy. Furthermore, an aggregate projected population will be provided for villages with a population under 1,500 as well as open countryside outside of villages and towns. This is considered a sensible approach for smaller tiers in the settlement hierarchy. This will also be reflected in both Table 2.11 of Chapter 2, Core Strategy as well as Table 3.4 of Chapter 3, Settlement and Housing Strategy.

**Observation 4 & 5:** The 2010 Regional Planning Guidelines included an acknowledgement that Ashbourne was 'transitioning towards Metropolitan character' which was an agreed position and strategy between Meath County Council and the Regional Authority Executive at that time. It was also envisaged at that time that in the next review of the RPGs (which were subsequently replaced by the RSES) that the Dublin Metropolitan Area boundary and constituent settlements would be revisited and reviewed with a view to addressing the growth or decline of such settlements in line with National Planning and Best Practice Strategies. A full review of the Dublin Metropolitan Area settlements did not subsequently take place during the MASP review process and the existing boundaries and settlements remained the same when the NPF and EMRA RSES were agreed. Ashbourne therefore remains outside the MASP area despite the fact that it is strategically located and has scale, mass and socioeconomic characteristics of other key towns already within the MASP area. Ashbourne is strategically located along the N2 abutting the Meath-Fingal boundary. Its proximity to Dublin Airport and Dublin City centre has resulted in the population in the town increasing such that it is now the second largest town in the County and had a population of 12,679 in 2016. With a population increase of 11.7% in

the period 2011-2016, Ashbourne recorded the highest population growth rate in the County during this period. It has the third youngest population in the country with an average age of 32.2. In relation to this observation, it is noted that the surveys in relation to the jobs ratio for these settlements was undertaken some time ago and is therefore outdated. Based on local research and analysis by Meath County Council, it is a fact that the jobs ratio for Ashbourne has significantly improved in the intervening period. In addition to three active business/industrial parks operating within the town delivering significant employment, there are two significantly large employment generating developments have been recently granted planning permission and include Dublin Aerospace (Planning Reg. Ref. No AA190803) and a Film Studio Complex (Planning Reg. Ref. No. AA180221 & AA200011). With regard to Dublin Aerospace, the Company has already relocated from Dublin Airport into an existing factory site in the town, and over the short term, will deliver 150 local jobs. Given the proximity of Ashbourne to the Airport, sister companies and ancillaries have already expressed further interest in relocating to Ashbourne. The permitted film studio development also has significant job creation potential. The existing planning permissions referred to above have the potential to deliver circa 200 jobs in the refurbishment of existing commercial units as film studios but the real potential exists in recently acquired zoned employment lands by the company surrounding the existing Pillo hotel. The company have made a submission on the Draft CDP (See submission MH-C5-761) for major rezoning and hope to generate up to 1500 jobs in the longer term at their site in Ashbourne. It is considered that this film studio has the potential to become the equivalent of Pinewood Studios in the UK. These investments are considered significant and shall provide significant economic returns for the local economy, but more importantly, reinforces the role and function of the Ashbourne within the Greater Dublin Area.

It is considered that these specific employment developments as well as those that have arisen in relatively recent pre-planning meetings will lead to a significantly higher jobs ratio for Ashbourne, thus justifying its designation as a Self-Sustaining Growth Town. Given the updated details outlined above, it is not considered appropriate to change the status of Ashbourne as part of the Settlement and Housing Strategy.

It is however considered appropriate that in order to meet the requirements of the recommendation, the wording of SH OBJ 11 should be amended as follows:

**SH OBJ 11**

To continue to support the ~~transition of Ashbourne towards a metropolitan settlement~~ **sustainable development of Ashbourne** by supporting its development as an enterprise and employment hub and by strengthening links and connectivity between Ashbourne, Dublin Airport and City Centre and the wider Metropolitan Area.

**Observation 5 & Recommendation 7:** In relation to NPO 9, Meath County Council has considered this national objective as part of the preparation of the Draft Plan and Meath

County Council is satisfied that the Draft Plan is generally consistent with the requirements of NPO 9. In relation to the two specific towns that are noted, Dunshaughlin and Dunboyne, it is considered that these are exceptional cases. Dunshaughlin is a desirable location in which to live and this has been recognised by An Bord Pleanála through the granting of recent large SHD applications. It is noted that these SHDs have largely driven the level of growth that is predicted in this town, with one application alone being permitted for 913 units. In this regard, the number of extant units that have been granted in Dunshaughlin through SHD's as well as the number of units currently being considered as part of SHD applications, reflect national policy for housing delivery consistent with the requirements of Rebuilding Ireland. On this basis, it is considered that the growth predicted as part of Table 2.11 for Dunshaughlin reflects current national policy. Furthermore, it is considered that failure to designate additional well located sequential lands in Dunshaughlin for development outside of the SHD sites that have extant permission could lead to a situation where residential units are not delivered in this settlement and choice does not exist within the town. As such, it is considered that the quantum of lands zoned, as well as the proposed growth rate is also reflective of the requirement of Section 95(1)(a) of the Planning and Development Act 2000, as amended. Planning legislation thus requires that there is not a scarcity of land available for residential development. It should also be noted that a potential new rail link has also been identified for Dunshaughlin as part of the proposed Dunboyne to Navan line (see TII Submission) and same will provide for improved mobility options as well as improving connections with Navan and meeting climate change targets, while delivering sustainable transport with Navan, being the County Town (and designated key town) is important. However, it is also important that there is adequate feeder population for any new public transport service to ensure that the service is financially viable and will provide an appropriate alternative to car based commuting. It has been noted that an increase in the population of Dunshaughlin and Navan will be a critical component of the NTA deliberations on the delivery of a train service to Navan which is also corporate goal of Meath County Council and this Development Plan.

With regard to Dunboyne/Pace/Clonee, it should be recognised that this settlement has 2 rail stations which is unique to any settlement of its size or location either within the MASP area or any other part of the country. It also the only full settlement in County Meath within the MASP Area. The railway stations, including the potential expansion of the rail line to Navan and the electrification of this rail line are important considerations in the growth of the Town. It is also significant that a Transportation Study has been agreed between Meath County Council, and Department of Housing Planning and Local Government, TII and NTA and this report includes significant infrastructure improvements required to deliver and accommodate the growth identified in the Core Strategy and MASP. In line with this strategy, the RSES in Section 5.2 notes that the growth of the metropolitan area includes a focus on the planned development of strategic development areas including Dunboyne. As such it is considered that this Transportation Study for Dunboyne area has been considered, developed and agreed by all relevant state agencies and EMRA. Dunboyne is therefore strategically based and located with significant growth

potential as outlined in the Draft Plan, is consistent with national policy. Furthermore, the 'live-work' community approach will be an important part of the planned growth in Dunboyne/Clonee as noted in Section 3.0 of the Dunboyne/Clonee Written Statement, in Volume 2 of the Draft Plan. The proposed level of growth in Dunboyne is also reflected in increased economic activity in Dunboyne/Clonee with an application expected in the near future for a science and technology use in the vicinity of the M3 Parkway. The Masterplan relating to the residential lands at M3 Parkway is at an advanced stage and it will be important that any grant of permission in Dunboyne/Clonee delivers infrastructure in line with the Transport Study. In this regard, the level of growth and the quantum of lands zoned reflect the integrated strategy for this location and is in accordance with MASP and the RSES for EMRA Region. The improvement in infrastructure can only be delivered in parallel with population growth. Finally, it is important to note that Meath County Council will continue to positively engage with Eastern and Regional Assembly in relation to the MASP and any population figures considered appropriate as part of this process will be supported by Meath County Council.

Based on the foregoing, Meath County Council is satisfied that the Draft Plan complies with national and regional policy as any additional settlement growth in excess of 30% has been provided in consultation with relevant regional and national agencies, reflecting appropriate long-term strategies or are as a result of permissions granted outside of the control of the Planning Authority, such as the SHD decisions noted above.

**Recommendation 8:** Meath County Council have considered this recommendation as well as the provisions of the NPF including NPO 18a and NPO 18b. Whilst it is important that a sustainable level of growth is provided for each settlement as part of the Draft Plan, it is also necessary to appropriately consider the specific and unique circumstances of each settlement and respective county rather than just strictly applying a quantitative national objective to a local level. It should be noted that across the settlement tier of villages referred to, the growth rate is c. 19% and as such Meath County Council are generally consistent with NPO7 and NPO9. This will be more evident in the updated Table 2.11 which will amalgamate the village level as part of the response to the OPR submission. Each of specific settlements highlighted will be addressed in turn. In the case of Kilbride, the 2016 population was 87 people. Between 2016-2019, 19 units were delivered which could provide an additional population of approximately 48 people. As such, a growth rate of 55% of the 2016 population has already occurred prior to the Draft Plan being adopted and as such it was necessary to provide for some limited additional growth into the future. The reason for the percentage of growth appearing so large relates to the low population base of Kilbride in 2016 and the proposed level of growth is reflective of the need to focus development into existing settlements rather than facilitating the proliferation of one-off rural housing.

In relation to Baile Gibb, Meath County Council would note that this area is a designated Gaeltacht area, and as such, it is appropriate to designate the area for population growth

so as to facilitate the work that Údarás na Gaeltachtra undertake as well as facilitating the implementation of NPO 29 in relation to Gaeltacht areas. Without the facilitation of growth in this area, it may not be possible to achieve this national objective at a local level. It is noted that this settlement has a very small population base to start with, 81 people in 2016 and that there is specific criteria outlined in Volume 2 of the Draft Plan including GHIB OBJ 4. It is also important that as part of the development of this settlement, that a landbank within the town is protected so as to ensure that there is appropriate lands to accommodate future population growth.

In relation to Rathmolyon, the settlement has 80 units that are already permitted at the time of drafting the subject plan, whilst 17 no. units were built between 2016-2019. These extant permissions, together with the units already under construction are responsible for the majority of the proposed population growth in this settlement over the period of the Draft Plan. As such, the proposed population growth is reflective of the developments permitted prior to the Draft Plan being adopted and it would be inappropriate to ignore these facts and evidence base.

As outlined above, the proposed growth across this tier is generally low when it is taken into account relevant to the quantum of people and houses that are to be provided. When reviewing population growth, it is submitted that it is inappropriate to consider the percentage figures alone without bearing in mind the specific designations of the settlement e.g. a Gaeltacht area or the recently constructed/extant units that relate to a specific settlement. It should also be noted that c.210 hectares of land has been de-zoned across this tier of settlements in the Draft Plan compared to the current CDP. This plan should, therefore, be considered a significant improvement on former plans, particularly as this plan must also provide alternatives to the stricter rural housing policy and avoid further proliferation of one off rural housing in the countryside. This is particularly relevant given the proposed changes to the local needs criteria as outlined in Chapter 9 Rural Development Strategy (See Appendix G for the revised Rural Settlement Strategy). It is submitted it may be inappropriate to reduce further the growth rate of these settlements due to the above consideration as same would be damaging to the vitality and viability of villages across County Meath. It is important to ensure that the above settlements are allowed to develop sustainably in line with NPO 15 & NPO 16.

Finally, it should be noted that the proposed level of development is considered to be in accordance with the infrastructure constraints that apply to each settlement as outlined the associated SEA.

**Observation 6:** The recommendation to include an objective to implement an Active Land Management Strategy is one in which is endorsed by the Chief Executive and will be included in the Draft Plan. With regard to a clear timeline to deliver the above, it is difficult to provide a clear time line and measurable targets at this point in time. At this time, it would simply not be possible to provide a realistic timeline for the

implementation of this strategy but this will be addressed once the impact of Section 251A of the Planning and Development Act 2000, as amended, are addressed and staff become available to implement this Active Land Management Strategy. Despite this, Meath County Council continue to place sites on the Vacant Site Register which is an important element of the Active Land Management Strategy and invoices in relation to lands on the Vacant Sites Register have recently been issued to landowners. The Active Land Management Strategy and 2 year review of the plan will provide vital information regarding implementation of all relevant sections of the plan.

**Recommendation 9:** Meath County Council welcome the comments that *“...the Core Strategy is generally consistent with the population targets under the NPF and RSES (the requirements of section 10 (2A) (b) Of the Act refer)...”* as this acknowledges and reflects the genuine efforts being made to provide a more sustainable development framework and growth strategy for the county over the new plan period. It is recognized and accepted that the underlying assumptions and calculations could have been more explicit, but the fundamentals of the strategy are sound and will provide for a more sustainable approach to housing in the County. It is noted that the average occupancy rate in the country is 2.75 persons per household as established by the Census of 2016. As outlined in Section 2.9.4 of the Draft Plan, there is no occupancy rate provided as part of the Regional Spatial and Economic Strategy that applies specifically to County Meath. The occupancy rate had been established and outlined under the former Regional Planning Guidelines that preceded the current RSES. The initial survey work and analysis for the Draft Plan dates back to 2017 when the statutory review process commenced. It has already been outlined in the Draft Plan that it is particularly difficult to establish an appropriate occupancy rate for the county particularly as the occupancy rates at a county, regional and national level are based on 2016 data. The variable size, scale and geographical location of County Meath introduces an additional challenge. It is also outlined in the Draft Plan, that at this time there is significant pent up demand due to adult children living with their parents awaiting the delivery of affordable and appropriate housing to meet their specific needs. The Draft Plan also identifies the lack of any updated Development Plan Guidelines from the Department of Housing Planning and Local Government. It is acknowledged that these guidelines would provide a definitive approach regarding Housing Need Demand Assessment (HNDA) at the relevant time for the County as outlined in NPO 37 of the NPF. Given the lack of clear guidance on this matter, Meath County Council undertook their own assessment based on historical occupancy rates, recent research and guidance as well as the previous projections outlined in the former RPGs and discussed same with EMRA. It was considered that based on the expectation in the regional planning guidelines that the occupancy rate would be 2.35 by 2022 and the fact that the occupancy rate vary widely during prosperity and recession, a rate of 2.5 was considered appropriate when initial research and analysis was carried out. This is further backed up by documents such as “Long-run projections of Ireland’s housing demand” prepared by Property Industry Ireland (IBEC) in April 2019, which predicts that by 2051 the average occupancy rate will be 2.12. As such, given the lack of national guidance, emerging and historical trends, the pent up demand



established from 2008 onwards and the most up to date research available at the time of publishing the Draft Plan, it was considered that the occupancy rate of 2.5 across the county was appropriate. With circa 319 ha of residential lands being dezoned within the Draft Plan, it is the considered view and opinion of the Chief Executive that the figures chosen of 2.5 was the most appropriate and that the rationale for population growth and resultant housing demand and required zoned residential lands are in turn developed on a good evidence and provide for a robust settlement strategy that is consistent with the NPF and RSES. Going forward however, Meath County Council undertakes to consistently utilise an occupancy rate of 2.75 persons per household in any future plans or strategies and amendments to the new CDP.

**Observation 7 and Recommendation 10:** The issues outlined in this section of the submission refer to the amount of zoned residential lands in the Core Strategy Table relative to the amount of zoned residential lands identified on the settlement maps. It is agreed that the quantum of lands already zoned for residential use as well as the lands zoned for a mixture of residential and other uses should be more clearly specified in hectares in the Core Strategy Table. This will be included as part of the updated Table 2.11. The yield from potential mixed use lands was discussed in greater detail under Recommendation 3 above. The quantum of lands zoned for residential uses in each settlement, particularly Navan, has been revisited and clarified. It is noted that there was a typo relating to the quantum of residential lands proposed for Navan. Given the number of proposed amendments to the Draft Plan, there will be further changes within the Core Strategy Table. As such it should be noted that Chief Executive is proposing that there are no significant additions to the quantum of zoned residential lands throughout the County. As the Chief Executive is acutely aware of the need for consistency between the Core Strategy and the NPF and RSES.

**Recommendation 11:** As noted in Section 3.5 of the Draft Plan, it is expected that the Updated Development Plan Guidelines being published by the Department will address the methodology for tiered zoning in more detail than that outlined as part of the National Planning Framework. Given the lack of guidance to date and the information that was available from infrastructure providers at the time of preparing the Draft Plan, it was not possible to outline a table such as that envisaged in the NPF. This approach is also consistent with the approach of other Local Authorities at this time. It should, however, be noted that c.319 hectares of land have been dezoned as part of the Draft Plan process and the decision on which lands to zone and dezone was influenced by the application of the principles of the tiered zoning approach. The infrastructure provision and capacity of settlements is outlined in the accompanying SEA Report which provided the basis and structure for the settlement strategy. Meath County Council have only zoned lands which have either access to necessary infrastructure or are expected to have access to the necessary infrastructure during the lifetime of the Draft Plan. This was informed by consultations with infrastructure providers and it is considered that the table as required by NPO72a, NPO72b and NPO72c can be provided during the lifetime of this plan as part of any review that may be necessary once the Updated Development Plan

Guidelines are issued by the Department of Planning, Housing and Local Government. The adoption of a tiered zoning approach will be further considered and incorporated into the drafting of the 15 Local Area Plans that are to be prepared as outlined in Section 3.4.5 of Vol. 1 of the Draft Plan. It should also be noted that a table in relation to infrastructure availability has been outlined as part of the SEA. In relation to prioritising of lands, Meath County Council has adopted the sequential approach to zoning, in combination with the zoning of extant permissions as well as the application of the principles of the tiered zoning approach as far as practicable. It should, however, be noted that as part of Rebuilding Ireland there is a strong expectancy of dwelling units being actually delivered and it is common for market pressures or land ownership issues to result in some sequentially preferable lands not coming forward for development ahead of other lands. In such a scenario the application of the sequential approach must be balanced consistently with the requirements of Rebuilding Ireland to deliver units, as well as the requirements of Section 95(1)(a) of Planning and Development Act 2000, as amended which notes that the Planning Authority is responsible for ensuring there is not a scarcity of land available for the delivery of housing. Also outlined in the submission is the Masterplan approach should not be used as a mechanism to address the sequential delivery of land across a settlement. Meath County Council agrees with this approach. The fundamental and beneficial value of masterplans is to ensure the coordinated delivery of strategic landbanks during the lifetime of the Development Plan. Finally, as noted above the quantum of lands zoned for new residential, existing residential as well as mixed use will be clearly outlined as part of the updated Table 2.11 and are consistent as far as practicable with the RSES and NPF.

**Recommendation 12:** It is a long-held objective of the Council, the NTA's Transportation Strategy for the GDA, and the RSES, to reinstate the rail link to Navan. However, the delivery of the rail link is reliant on a definitive commitment on timeframe and the making of a rail order.

As outlined in the response to the submission from the Eastern Midlands Regional Assembly on the Draft Plan and in accordance with the EMRA RSES Ministerial Direction issued in January 2020 and consequent amendment to Section 5.6 and Table 8.2 of the RSES; MOV POL 5, MOV POL 6 and MOV OBJ 3 of the Draft County Development Plan will be amended to ensure consistency of the EMRA RSES and the NPF. Recognising the critical role of public transport on the economic competitiveness of the county, the quality of life of residents and reduction of transport emissions, this amendment does not dilute the commitment of Meath County Council to further progress the delivery of the Navan Rail link, a policy which will serve to reduce GHG emissions from transportation and contribute to the regions transition to a low carbon economy.

**Observation 8:** The towns of Ashbourne and Ratoath are the second and fourth largest towns in County Meath with a population of approximately 13,000 and 9,000 respectively. Given the substantial growth of these town in recent years, due mainly to their strategic proximity to Dublin, it is considered imperative to consider the long-term

requirements of these towns beyond the lifetime of the County Development Plan. Given the long-term potential for the population growth in these towns to reach critical mass for a rail line, it is considered appropriate to include the potential concept of a rail link having regard to the long-term sustainable requirements of these towns. These towns are considered significant large towns in an Irish context and it reasonable to consider that if a rail line were to be developed in relatively close proximity, that a spur of the line should at least be considered in planning for same. It is acknowledged, accepted and agreed that a rail link serving Ratoath and Ashbourne cannot be considered or planned in advance of the delivery of the Navan rail link. The delivery of the Navan rail line from Dunboyne is the single greatest priority of Meath County Council future infrastructure developments and is provided for in the existing plan and this draft plan by the zoning and preservation of appropriate lands. As such, it is considered necessary to retain ASH OBJ 15 whilst necessary to amend the objective to ensure its compliance with national policy.

**Observation 9:** In relation to this observation, it is noted that CS OBJ 10 and CS OBJ 11 already address the proposal to prepare these joint urban plans for the settlements of Maynooth and Drogheda. Whilst the intention of the OPR is to ensure that these plans are prepared as a priority, it should be noted that as the plans require the co-operation of two Local Authorities consequently Meath County Council cannot as such control the timeline within which these plans are delivered. It would, therefore, be inappropriate to provide an objective that would delay the preparation of other local area plans should any issues arise in the preparation of the Joint Vision and Urban Area Plan for Drogheda and Maynooth. It is fully accepted that the preparation of these plans is of strategic national and regional significance. The preparation of same are important to Meath County Council therefore, CS OBJ 10 and CS OBJ 11 will be amended to note that these plans should be prepared as a priority relative to other Local Area Plans.

**Recommendation 13:** Meath County Council will include the zoning of adjoining planning authorities as part of the preparation of the Draft Plan and will therefore include these in Drogheda, Maynooth, Kilcock and Ashbourne. The land use zonings of adjoining planning authorities have been considered as part of the preparation of the Draft Plan.

**Observation 10:** It is noted that a settlement statement is included in Volume 2 for Mornington/Mornington East/Bettystown/Laytown, however, the settlement is referred to as 'East Meath Written Statement'. In this regard the information sought is provided as part of the Draft Plan. However, the title of the specific settlement strategy will be clarified to avoid any confusion and provided consistently throughout the Draft Plan.

**Recommendation 14:** In relation to the proposed masterplan in Ratoath between the settlement boundary and Fairyhouse Race Course and Tattersalls, it is considered that the proposal is an appropriate approach to this site as the lands proposed to be zoned as "White Lands" constitute a strategic landbank suitable for future economic development that should be protected and which develop in conjunction with the existing tourism use and provide significant employment and economic benefits to the town. The lands zoned

Tourism are already largely developed and as such there is no need for a masterplan on these lands alone. The intention of the masterplan is to ensure that the proposed uses for the strategic land bank of “White Lands” is consistent with the existing uses in the Tourism zoning as well as providing a use that will provide additional much needed employment generating opportunities in Ratoath. The lands zoned as Tourism largely relate to the Fairyhouse Racecourse and Tattersalls and it is considered that there is an opportunity to provide for the expansion of the facility and/or the provision of complimentary and ancillary services/facilities. This is outlined as part of ED OBJ 58. The masterplan approach is required to ensure that the land bank is protected and appropriately developed to ensure that the resident population of Ratoath are provided with significant employment generated activities that will boost the local economy and therefore ensure that the settlement will become more self-sufficient and further develop ‘live-work’ community approach. The masterplan will also facilitate the development of phase 2 of the LIHAF road to ensure connectivity to the Fairyhouse road. More detail regarding the masterplan and the provision of phase 2 of the LIHAF road is included in submission MH-C5-372 and MH-C5-386.

**Observation 11:** The observation to include an order of priority for the local transport plans is quite challenging. As outlined previously, the order of priority for Local Area Plans (of which transport plans will be completed in parallel) has not been agreed or established but priority will be given to Joint Urban Area Plans and larger settlements where considerable development pressures exist. All of the above is also dependant on prevailing economic conditions which are changing with the current Covid 19 pandemic and the resources available to deliver same.

**Recommendation 15:** Meath County Council positively welcomes the fact the OPR agree with the approach of the Rural Development Strategy. In relation to the designation of the rural nodes, it is highlighted that as part of the Draft Plan, a booklet of the rural nodes identifying their boundary was provided as part of the Draft Plan. Relevant parts of this booklet will be updated as part of the Material Amendments as there are some consequential amendments to existing nodes following consideration and assessment of submissions on the Draft Plan. In relation to the designation of the Rural Nodes, it is noted that the preparation of the Rural Development Strategy has been difficult in the absence of the long awaited updated Guidelines on Sustainable Rural Housing. The Rural Nodes that have been identified constitute viable alternatives to one off rural housing and are generally reflective of locations where there are already existing services and clusters of buildings. Following on detailed survey and analysis the selected locations are considered appropriate for such designations given their status in the context of the rural area in which they are situated. The provision of Rural Nodes is important in the context of the overall Rural Development Strategy. As part of the rural strategy outlined in the Draft Plan, it is proposed to implement greater controls on rural housing and the identification of Rural Nodes provides an alternative to the current unsustainable proliferation of one-off rural houses currently being developed in parts of County Meath. It is intended that future applicants in high pressure areas who would have previously

been able to achieve planning permission in rural areas will now be directed and accommodated in local rural nodes. The approach outlined in the Draft Plan has led to hundreds of submissions being made in relation to the Rural Development Strategy. The majority of these submissions oppose the proposed approach and wish to retain the existing policies or promote an even more relaxed approach to one-off rural housing. In order to provide acceptable alternative options, it is considered that the Rural Node approach is essential to providing a more balanced and tailored approach to rural housing whereby those who actually need or must live in the rural area, get to do so. It is considered that an appropriate balance between urban and rural development must be struck and as indicated above, the majority of submissions have noted that the balance in the Draft Plan is inappropriate. As such, Meath County Council and the Chief Executive have determined that it is necessary to make amendments to the Rural Development Strategy outlined in the Draft Plan (see Appendix G for revised document relating to same). It is considered that the proposed amendments will provide an appropriate balance between the submissions made as well as ensuring that the updated approach is consistent with the policy objectives of the National Planning Framework and the Regional Spatial and Economic Strategy 2019-2031. It is considered that the revised Rural Development Strategy Chapter has provided a simplified and clarified approach to the development of the rural area of Meath, including the Rural Nodes.

**Observation 12:** This observation refers to the need for specifying densities in the Draft Plan. It was not possible to identify the referred to guidance in relation to densities or residential development which it was stated was published in 2012. It is assumed that this observation may refer to the “Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas” that was published in May 2009. Having reviewed these guidelines, it is noted that Draft Plan should be amended to provide an appropriate range of densities for various categories of settlements throughout the settlement hierarchy. Having considered the matter, it is considered appropriate to provide a range of densities for each tier of the settlement hierarchy. These updates will be reflected across Vol. 1 and Vol. 2.

**Recommendation 16:** Having reviewed the content of this submission, it is noted that the proposed objective DM OBJ 61 is not consistent with the provisions of the Design Standards for New Apartments, Guidelines for Planning Authorities 2018. It is therefore proposed that DM OBJ 61 shall be removed. It is considered that the response to recommendation 2 address the support for SPPR 4 as part of the Draft Plan.

**Recommendation 17:** It is considered that the amendments proposed as part of the response to Observation 12 of the OPR submission should address this concern. It is considered that a higher density of development is appropriate in proximity to existing rail stations and public transport interchanges as well as those that are proposed. In this regard, it is noted that an increased density could be appropriate proximate to the lands identified for a future rail station in Navan Town Centre. As such, it is considered that this

matter has been appropriately considered as part of the proposed amendments to the Draft Plan.

**Observation 13:** The development of a link road connecting Stamullen Village to the City North Business Park has been supported by Meath County Council in the current Plan and is supported in the Draft Plan as reflected by STA OBJ 9 of the Stamullen Written Statement. Although served by Junction 7 of the M1 Motorway, there is no direct connection into the town from the motorway. It is the view of Meath County Council that the requirement for this link road remains given that the existing road layout requires residents to travel a lengthy and circuitous route via the former N1 (R132).

It is understood that the proposed link road was subject to a previous planning application MCC Ref AA170598; ABP Ref 301284-18 which was granted by the Planning Authority as same complied with the relevant Development Plan and subsequently refused on appeal by An Bord Pleanála.

In the assessment of this application, we note the Board was *'not satisfied that the proposed development would not adversely affect the strategic role and function of the national road network. The proposed development would, therefore, conflict with policies to protect investment in national roads, as set out in the "Spatial Planning and National Roads Guidelines for Planning Authorities" issued by the Department of the Environment, Community and Local Government in January 2012'*. In the Inspector's Report, it states that the Inspector had read the applicant's Traffic Impact Assessment (TIA) and in general accepted the overall findings. However, it was also noted that the TIA assumed that the proposed link road will not alter volumes of traffic joining or leaving the motorway at Junction 7 and the Inspector considered that this scenario is unlikely. The Inspector went on to say that *'The assessment, therefore, has no regard for the likely indirect effects of the connection of Stamullen to the motorway i.e. how it would affect traffic movements in the area to the west of Stamullen and potentially other junctions and flow patterns on the M1. Given the strategic economic importance of the M1 linking the capital City to Belfast, the very clear policies at national and regional level which seek to safeguard the carrying capacity of the national road network, such an omission is significant. In addition to the above, in the absence of a wider assessment of the implications of the development for traffic flows in the region, the development could result in unforeseen traffic flows through the residential lands to the south of the site (including HGVs) and the junction of this estate road with Gormanstown Road, to the detriment of residential amenity and amenity of the village of Stamullen.'*

The above assessment does not categorically state that the proposed road in question is unacceptable in principle. It does however provide guidance and direction as to how the proposed road should be fully assessed taking into account the wider context of junction 7 of the M1 motorway. The proposed road is to be delivered by private developers and any future application should ensure the Board's comments will be considered in any future planning application for the link road.

## Chief Executive's Recommendation

**Observation 1:** Change Recommended – Vol 1, Chapter 2-Core Strategy, Inclusion of new objective:

### CS OBJ XX

**To undertake a review during the lifetime of the Plan so as to ensure compliance with Climate Change requirements as outlined in the forthcoming Updated Development Plan Guidelines for Planning Authorities as per section 10(2)(n) of the Act.**

**Observation 2:** Change Recommended: Re-structure Chapter 5 Movement Strategy to reflect a hierarchy of sustainable transport modes. The re-ordering of Chapter 5 will take the following structure: Walking, Cycling, Rail, Bus, Park & Ride, Taxi, Electric Vehicles and Roads Infrastructure.

**Observation 3:** Change Recommended: Vol 1, Chapter 5 of the Draft Plan as follows:

**Where relevant, the manual must be implemented** ~~taken into account~~ by all Planning Authorities when permitting or planning development.

**Recommendation 1:** Refer to Written Statements for Drogheda, Ashbourne, Dunshaughlin, Dunboyne, Ratoath, Navan, Kells which will include existing and targeted modal splits for each town. This will be included as part of the material amendments and is being carried out in consultation with the NTA.

**Recommendation 2:** Change Recommended: Vol. 1 Written Statement, Chapter 3 Settlement Strategy, Remove objective SH OBJ 22, SH OBJ 23, SH OBJ 24, SH OBJ 25, SH OBJ 26, SH OBJ 27 and insert new objective and update numbers of objective:

### SH OBJ XX

**To require that, where relevant, all new residential developments shall be in accordance with SSPR 1 to SPPR 4 of the Urban Development and Building Heights Guidelines for Planning Authorities, December 2018 as well as SPPR 1 to SPPR 9 of the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities, March 2018. All new residential development should comply with the densities outlined in Chapter 11 of this plan.**

**Recommendation 3:** Change Recommended: Table 2.11, Chapter 2 Core Strategy, Volume 1 Written Statement:

Please refer to the revised table at the end of this submission recommendations

Change Recommended: Vol. 1 Written Statement, Chapter 2- Core Strategy, Section 2.8.2:

The population projection for Meath is therefore 227,500 in 2026. **The difference between the projected 2026 population for the county and the projected 2031 population is 4,000. When this growth is divided across the five-year period, it results in an annual increase of 800 people per year. This results in the population projection for Meath being 228,300 in 2027.**

**The consequent additional population for 2027 has been directed into Navan as this reflects the County Town and Key Town status of this settlement.**

Change Recommended: Vol. 1 Written Statement, Chapter 2- Core Strategy, Section 2.10.4:

Table 2.11, the 'Core Strategy Table', sets out the population projections and household allocation for each settlement up to ~~2026~~ **2027**. This table provides details of the most recent population, population projections, the development activity in each settlement between 2016-2019, the number of unbuilt permitted units, and the household allocation for each settlement between 2020-~~2026~~**2027**.

Change Recommended: Vol. 1 Written Statement, Chapter 2- Core Strategy, Section 2.10.4:

**It is noteworthy that the yield from mixed use developments over the 2013-2019 plan period is relatively small at approximately 128 units. It is not anticipated that the quantum of lands zoned mixed use as part of the Draft Plan will lead to a significantly higher yield of housing outside of that provided for in Table 2.11. An assessment of the existing residential lands in the 2013-2019 plan period resulted in a yield from the existing residential lands of c.949 units. It is considered that the delivery of residential units on lands zoned existing residential will be low as development will be restricted to backlands and gap sites in existing residential areas. The expected number of units to be delivered has been accounted for as part of Table 2.11 and is consistent with the figures above.**

On foot of the above amended Table 2.11 and Section 2.8.2, further changes are required to the following sections:

- Vol. 1 Written Statement, Chapter 2- Core Strategy, Section 2.7
- Vol. 1 Written Statement, Chapter 2- Core Strategy, Section 2.8.1
- Vol. 1 Written Statement, Chapter 2- Core Strategy, Section 2.8.3
- Vol. 1 Written Statement, Chapter 2- Core Strategy, Section 2.9.5:



- Vol. 1 Written Statement, Chapter 2- Core Strategy, Section 2.9.6:
- Vol. 1 Written Statement, Chapter 2- Core Strategy, Section 2.10.4:
- Vol. 1 Written Statement, Chapter 2- Core Strategy, Table 2.7
- Vol. 1 Written Statement, Chapter 2- Core Strategy, Table 2.9
- Vol. 1 Written Statement, Chapter 2- Core Strategy, Table 2.10
- Vol. 1 Written Statement, Chapter 2- Core Strategy, Table 2.12
- Vol. 1 Written Statement, Chapter 2- Core Strategy, Fig. 2.6
- Vol 2 Written Statements for Settlements, were relevant

Change recommended: Vol 1, Chapter 2-Core Strategy Section 2.14.2:

**SH OBJ XX**

**To incorporate the relevant housing needs for 2027 into the Housing Strategy over the lifetime of the Development Plan.**

**Recommendation 4:** No Change Recommended

**Recommendation 5:** Change Recommended - Vol 1, Chapter 2-Core Strategy:

**CS OBJ 7**

To operate an Order of Priority for the release and development of residential lands with any lands identified as being ‘Post 20267’ ~~not available for development until after 2026~~ **not being available for residential development during the lifetime of the subject development plan and consequently planning permission for residential dwellings will not be granted on these lands by Meath County Council.** ~~in settlements where ‘Post 2026’ lands have been identified.~~

Vol 1, Chapter 3-Settlement and Housing Strategy:

**SH OBJ 4**

To operate an Order of Priority for the release and development of residential lands with any lands identified as being ‘Post 20267’ ~~not available for development until after 2026~~ **not being available for residential development during the lifetime of the subject development plan and no permission for dwellings will be granted on these lands by Meath County Council.**

**Recommendation 6:** Change Recommended: Vol. 1 Written statement, Chapter 2 Settlement Strategy, Table 2.3:

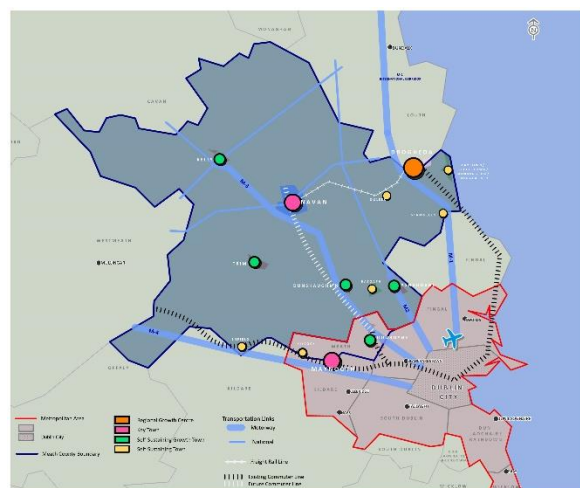
Settlement Typology	Description	Location
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Dublin City and Metropolitan Area	International business core with a highly concentrated and diversified employment base and higher order retail, arts, culture and leisure offer. Acts as national transport hub with strong inter and intra-regional connections and an extensive commuter catchment.	Dublin City and suburbs Dunboyne/Dunboyne North/ Clonee Maynooth Kilcock
Regional Growth Centres	These are large towns with a high level of self-sustaining employment and services that act as regional economic drivers and play a significant role for a wide catchment area.	Drogheda
Key Towns	Large economically active service and/or county towns that provide employment for their surrounding areas and with high quality transport links and the capacity to act as growth drivers to complement the Regional Growth Centres.	Navan, Maynooth
Self-Sustaining Growth Towns	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 self-sustaining.	Ashbourne, Dunshaughlin, Kells, Trim, Dunboyne/ Dunboyne North
Self-Sustaining Towns	Towns with high levels of population growth and a weak employment base which are reliant with other areas for employment and/or services and which require targeted 'catch-up' investment to become more self-sustaining.	Laytown Bettystown- Mornington-Donacarney, Ratoath, Enfield, Stamullen, Kilcock, Duleek
Towns and Villages	Towns and villages with local service and employment functions	Towns – Athboy, Oldcastle, <del>Villages – Ballivor,</del> Longwood, <del>Clonee</del>
Rural	Rural villages less than 1,500 and the wider rural region	Carlanstown, Carnaross, Clonard, <del>Clonee</del> , Crossakiel, Donore, Drumconrath, Gibbstown, Gormanstown, Julianstown, Kentstown, Kilbride, Kildalkey, Kilmainhamwood, Kilmessan, Moynalty, Nobber, Rathcairn, Rathmolyon, Slane, Summerhill

Change required to Map 2.3, Chapter 2 Core Strategy, Vol. 1 Written Statement due to the above updates.



Draft Plan



Proposed Changes

Change Recommended: Vol. 1 Written statement, Chapter 3 Settlement Strategy, Table 3.4:

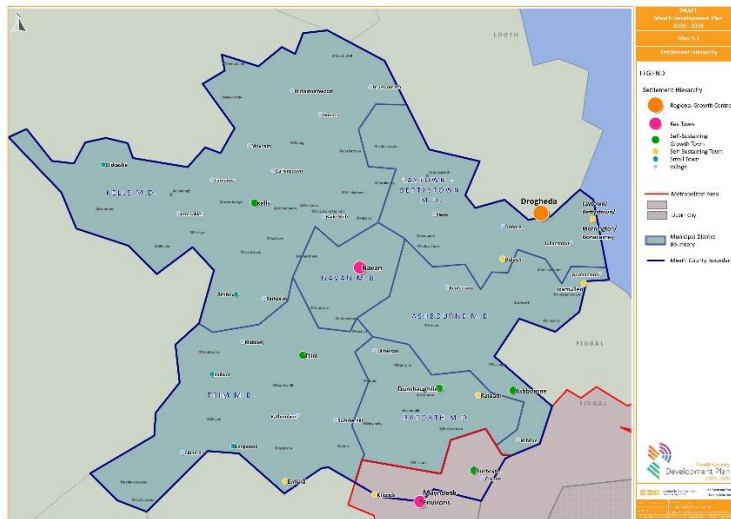
Settlement Type	Description	Settlement
Regional Growth Centre	Large towns with a high level of self-sustaining employment and services that act as regional economic drivers and play a significant role for a wide catchment area.	South Drogheda Environs
Key Town	Large economically active service and/or county towns that provide employment for their surrounding areas and with high quality transport links and the capacity to act as growth drivers to complement the Regional Growth Centres.	Navan Maynooth
Self-Sustaining	Towns with a moderate level of jobs and services – includes sub-county market towns and commuter towns with good transport	Dunboyne Ashbourne Dunshaughlins

Growth Towns	links and capacity for continued commensurate growth to become more Self-Sustaining.	Kells, Trim
Self-Sustaining Towns	Towns with high levels of population growth and a weak employment base which are reliant on other areas for employment and/ or services and which require targeted 'catch up' investment to become more self sustaining.	Laytown/Bettystown/Mornington/ Donacarney Ratoath Enfield Duleek Stamullen Kilcock
Towns and Villages	Towns and villages with local service and employment functions.	Towns – Athboy Duleek, Oldcastle, <del>Villages – Ballivor and Longwood</del>
Rural	Villages and the wider rural region	Baile Ghib, Carlanstown, Carnaross, Clonard, Clonee Crossakiel, Donore, Drumconrath, Gormanstown, Julianstown, Kentstown, Kilbride, Kildalkey, Kilmainhamwood, Kilmessan, Moynalty, Nobber, Rathcairn, Rathmolyon, Slane, Summerhill

Change recommended to Map 3.1, Volume 3, Book of Maps due the above as well as including the locations of rural nodes.



Draft Plan



### Proposed Plan

Change recommended to Section 3.4.9 and Section 3.4.10 of Chapter 3 Settlement Strategy, Vol. 1 Written Statement:

#### **Section 3.4.9**

**Whilst Duleek has experienced commuter-led residential development, employment in the town has also grown through the expansion of the Business Park. The continued expansion of the Business Park will be encouraged in order to provide a greater proportion of employment locally, consistent with the settlements role as a self-sustaining town proximate to a regional growth centre.**

#### Section 3.4.10

~~Whilst Duleek has experienced commuter led development, employment in the town has also grown through the expansion of the Business Park. The continued expansion of the Business Park will be encouraged in order to provide a greater proportion of employment locally, consistent with its role as a small town.~~

Changes to Volume 2 are required on foot of the above.

**Observation 4 & 5:** Change Recommended - Vol 1, Chapter 3-Settlement and Housing Strategy, Section 3.7:

#### **SH OBJ 11**

To continue to support the ~~transition of Ashbourne towards a Metropolitan Settlement~~ **sustainable development of Ashbourne** by supporting its development as an enterprise and employment hub and by strengthening links and connectivity between Ashbourne and Dublin Airport and City Centre and the wider Metropolitan Area.

**Recommendation 7:** No Change Recommended

**Recommendation 8:** No Change Recommended

**Observation 6:** Change Recommended – Vol. 1, Chapter 2, Core Strategy, 2.14.2:

**CS OBJ XX**

**To implement an Active Land Management Strategy in relation to vacant land in settlements within County Meath and to maintain and update as required a Vacant Sites Register to ensure efficient and sustainable use of the County’s land resources in accordance with the provisions of the Urban Regeneration and Housing Act 2015 as well as the Planning and Development Act 2000, as amended.**

**Recommendation 9:** No Change Recommended

**Observation 7 and Recommendation 10:** No change recommended – please refer to Recommendation 3 above.

**Recommendation 11:** No Change Recommended

**Recommendation 12:** Change Recommended: Vol 1 Written Statement, Chapter 4 Economic and Employment Strategy & Chapter 5 Movement Strategy:

**MOV POL 5**

To actively pursue in conjunction with Irish Rail the ~~implementation~~ **reappraisal** of the extension of the Dunboyne/M3 Parkway line to Navan during the Mid Term Review of the GDA Transport Strategy in accordance with the precepts of the RSES for the EMRA Region.

**MOV POL 6**

To ~~promote, facilitate and advance the delivery~~ **support the reappraisal** of Phase II of the Navan railway line project and associated rail services in cooperation with other relevant agencies.

**ED OBJ 24**

To ~~implement the extension~~ **support the reappraisal** of the Dunboyne/M3 Parkway rail line to Navan during the Midterm review of the Regional Spatial and Economic Strategy, in accordance with Table 8.2 of the Regional Spatial and Economic Strategy.

**MOV OBJ 3**

(a) To protect and safeguard the detailed designed alignment of Phase II of the Navan rail route and surrounding lands (including identified station locations), as illustrated on Map Series No. 5.1 in Volume 4, free from development and any encroachment by inappropriate uses which could compromise its future development as a rail facility, **prior to the reappraisal of the project as part of Mid Term Review of the GDA Transport Strategy in accordance with the precepts of the RSES.**

**Observation 8:** Change Recommended:

Delete SH OBJ 12 and ED OBJ 39 and amend ASH OBJ 15 and MOV OBJ 3 as follows:

~~ASH OBJ 15~~

~~To support the preparation of a feasibility study exploring the potential of rail connection to Dublin by means of a spur serving Ashbourne and Ratoath from the Navan-Dublin line.~~

~~SH OBJ 12~~

~~To support the preparation of a feasibility study exploring the potential of a future rail spur off the Navan-Dublin Rail line from Dunshaughlin to serve Ashbourne and Ratoath.~~

~~ED OBJ 39~~

~~To explore in conjunction with Irish Rail and other stakeholders the feasibility of a future rail spur off the Navan-Dublin Rail line from Dunshaughlin to serve Ashbourne and Ratoath.~~

~~MOV OBJ 3~~

~~(b) To explore in conjunction with Irish Rail and other stakeholders the feasibility of a future rail spur off the Navan-Dublin Rail line from Dunshaughlin to serve Ashbourne and Ratoath.~~

**ASH OBJ 15**

**As part of the future planning of the Dunboyne/M3 Parkway line to Navan, the possibility of a spur serving Ashbourne and Ratoath should be explored subject to compliance with national policy and the Railway Order.**

**MOV OBJ 3**

**(b) As part of the future planning of the Dunboyne/M3 Parkway line to Navan, the possibility of a spur serving Ashbourne and Ratoath should be explored subject to compliance with national policy and the Railway Order.**

**Observation 9:** Change recommended - Vol. 1, Chapter 2, Core Strategy, CS OBJ 10 and CS OBJ 11:

**CS OBJ 10**

To prepare, **as a priority**, a Joint Vision and Urban Area Plan for Drogheda in partnership with Louth County Council within the lifetime of this Plan in accordance with the

requirements of Regional Policy Objective 4.8 of the RSES for the Eastern and Midland Region and the recommendations set out in the Report of the Drogheda Boundary Review Committee published in February 2017.

**STH DRO OBJ 1**

To prepare, **as a priority**, a Joint Vision and Urban Area Plan for Drogheda in partnership with Louth County Council within the lifetime of this Plan in accordance with the requirements of Regional Policy Objective 4.11 of the RSES for the Eastern and Midland Region and the recommendations set out in the Report of the Drogheda Boundary Review Committee published in February 2017.

**CS OBJ 11**

To prepare, **as a priority**, a Joint Vision and Local Area Plan for Maynooth in partnership with Kildare County Council within the lifetime of this Plan in accordance with the requirements of Regional Policy Objective 4.35 of the RSES for the Eastern and Midland Region.

**MAY POL 1**

To prepare, **as a priority**, in conjunction with Kildare County Council a joint Local Area Plan for Maynooth, over the period of the Plan.

**Recommendation 13:** Change recommended – Inclusion of land use zonings for adjacent local authorities to be provided after consultation with relevant adjoining planning authorities.

**Observation 10:** Change recommended – Vol 1 and Vol 2 wherever necessary;  
~~Bettystown – Laytown – Mornington East – Donacorney – Mornington East Meath~~

**Recommendation 14:** No Change Recommended

**Observation 11:** No Change Recommended

**Recommendation 15:** No Change Recommended – please refer to revised Chapter 9 Rural Development Strategy attached as Appendix 6 in the CE Report.

**Observation 12:** Change recommended – Vol. 1, Chapter 11 – Development Management Standards and Land Use Zoning Objectives, section 11.7.2:

Delete DM OBJ 12, DM OBJ 13, DM OBJ 14 and DM OBJ 15.

Include the following objective;



## DM OBJ XX

The following densities shall be encouraged when considering planning applications for residential development:

**Residential Development Beside Rail Stations: 50uph or above**

**Regional Growth Centres: (Navan/Drogheda) - 35-45 uph**

**Self-Sustaining Growth Towns: (Dunboyne, Ashbourne, Trim, Kells, Ratoath): greater than 35uph**

**Self-Sustaining Towns: 25uph - 35uph**

**Smaller Towns and Villages: 25uph - 35 uph**

**Outer locations: 15uph – 25uph**

**It should be noted that SPPR 1 of the Urban Development and Building Heights Guidelines for Planning Authorities December 2018 shall be considered in the implementation of the above densities.**

Change recommended: Vol 2, Navan Written Statement, Section 7.0:

Delete NAV OBJ 2

Change recommended: Vol 2, Dunboyne & Clonee Written Statement, Section 6.0:

Delete DCE OBJ 2

**Recommendation 16:** Change Recommended: Vol. 1, Written Statement Chapter 11 Development Management Standards and Land Use Zoning Objectives, Section 11.7.15 Apartments

### ~~DM OBJ 61~~

~~Apartment development proposals shall also have regard to the following:~~

- ~~• A minimum of 33% of apartments in any apartment scheme shall be dual aspect; Any apartment scheme shall comply with the requirements of SPPR 4 of the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities or any replacement guidelines issued by the DHPLG in relation to the requirements for a percentage of apartments to be dual aspect units.~~
- ~~• A minimum floor to ceiling height of 2.7metres in apartment units, at ground floor level;~~
- ~~• Private amenity space shall be provided, primarily accessible from the main living area of the apartment, generally in the form of balconies/ terraces. Vertical privacy screens should be provided between adjoining balconies;~~
- ~~• Communal amenity space shall be provided suitable for passive recreation;~~

• For apartment schemes of 10 or more, the majority of all apartments in a proposed scheme shall exceed the minimum floor area standard for any combination of the relevant 1, 2 or 3 bedroom unity types, by a minimum of 10%.

**Recommendation 17:** Refer to response to Observation 12 above regarding densities.

**Observation 13:** No Change Recommended.

**Recommendation 3:** Changes to Table 2.11 as noted above:

Column A	Column B	Column C	Column D	Column E	Column F	Column G	Column H	Column I
Settlement	Population 2016	Projected population increase to 2026	Projected population 2026	Approximate households completed 2016-2019	Extant units not yet built	Household allocation 2020-2026 <sup>32</sup>	Potential units to be delivered on infill/brown-field lands <sup>33</sup>	Quantum of land zoned for residential use (ha)
Regional Growth Centre								
Drogheda	6,527	3,300	9,827	113	572	1,631		178.73
Key Town								
Navan	30,173	5,100	35,273	781	924	2,884	1,936	83.6 <sup>39</sup>
Maynooth	0	1,000 <sup>40</sup>	1,000	0	0	500	0	21.36
Self-Sustaining Growth Town								
Dunboyne	7,272	3,300	10,572	48	119	2,002	1,180	73.32
Ashbourne	12,679	3,200	15,879	632	209	1,349	351	33.47
Frim	9,194	2,250	11,444	31	437	1,333	812	44.27

Kells	6,135	1,000	7,135	48	391	452	400	19.3
Dun-shaughlin	4,035	2,200	6,235	470	1,156 <sup>41</sup>	1,003	82	32.8

Column A	Column B	Column C	Column D	Column E	Column F	Column G	Column H	Column I
Settlement	Population 2016	Projected population increase to 2026	Projected population 2026	Approximate households completed 2016-2019	Extant units not yet built	Household allocation 2020-2026 <sup>37</sup>	Potential units to be delivered on infill/brown-field lands <sup>38</sup>	Quantum of land zoned for residential use (ha)
Self-Sustaining Towns								
Bettystown-Laytown-Mornington East	11,872	1,500	13,372	689	518	746 <sup>42</sup>	264	25.15
Ratoath	9,533	1,500	11,033	175	72	803	101	25.74
Enfield	3,239	1,000	4,239	45	135	474	84	15.75
Stamullen	3,361	500	3,861	1	215	290	58	11.8
Kilcock	93	500	593	100	180	180	0	8.79
Small Towns								
Athboy	2,445	350	2,795	34	127	200	100	16.37
Duleek	4,219	500	4,719	36	85	336	250	10.9

Oldcastle	1,383	350	1,733	16	0	166	110	9.78
Villages								
Baile Ghib	81	50	131	0	0	20	0	2.52
Ballivor	1,809	100	2,009	0	0	40	40	1.93
Carlans town	664	100	764	14	1	40	32	1.72
Carnaross	159	50	209	1	0	20	13	1.17
Clonard	347	50	397	0	0	20	20	1.01
Clonee	826	200	1,026	83	24	60	60	0.8
Crossakiel	181	50	231	0	0	20	8	0.67
Donore	760	100	860	4	2	50	6	2.76
Drumconrath	345	50	395	0	2	20	11	0.86

Column A	Column B	Column C	Column D	Column E	Column F	Column G	Column H	Column I
Settlement	Population 2016	Projected population increase to 2026	Projected population 2026	Approximate households completed 2016-2019	Extant units not yet built	Household allocation 2020-2026 <sup>25</sup>	Potential units to be delivered on infill/brown field lands <sup>26</sup>	Quantum of land zoned for residential use (ha)
Germanston	375	50	425	0	2	20	0	2.16

Julianstown	681	75	756	0	21	30	28	1.21
Kentstown	1,179	100	1,279	1	39	70	38	3.4
Kilbride	87	75	162	19	0	35	19	0.7
Kildalkey	708	50	758	1	0	20	6	1.5
Kilmainhamwood	316	50	356	4	0	20	20	1.35
Kilmessan	654	250	904	0	97	100	17	3.82
Longwood	1,581	200	1,781	16	68	104	20	1.22
Meynalty	96	50	146	0	1	20	6	0.64
Nobber	344	50	394	0	0	20	10	3.49
Rathcairn	156	75	226	2	0	35	0	3.43
Rathmolyon	334	225	559	17	80	90	87	4.68
Slane	1,369	225	1,469	4	37	90	85	5.84
Summerhill	878	100	978	28	6	40	18	6.38
Rural nodes and open countryside	68,948	3,125	72,079	300	€300	1,336	N/A	N/A
Total	195,044	33,000	228,000	3,713	5,820	16,669	6,272	663.56

Table 2.11: Core Strategy Table, Population and Household distribution to 2026

<sup>37</sup> This figure does not include the units completed 2016-2019. The calculation of the household allocation has factored in the 'pent-up' demand for housing which has resulted in an increase in the average household occupancy rate for existing households. As the housing market continues to normalise and supply begins to meet demand it is anticipated that the average household occupancy rate for both existing and new households will begin to decrease.

<sup>38</sup> This includes both greenfield and brownfield sites in the built up area of each settlement and consists of lands zoned for town centre, mixed use, and residential development. For clarification these units have been included in the Household allocation.

<sup>39</sup> This does not include the 38.1ha SDZ at Clonmagadden. This SDZ will span over multiple Development Plans. Taking this into account in addition to the fact that a review of the Planning Scheme is required, the SDZ has not been included in the Household allocation for Navan.

<sup>40</sup> Half of this population allocation (500 persons) is taken from the MASP allocation. This is provided for in section 5.7 of the Dublin MASP 'Housing Delivery'. This is a preliminary figure, with the final figure to be agreed with the MASP Implementation Group. At the time of writing the MASP Implementation Group had not been established.

<sup>41</sup> Under a Strategic Housing Development application permission was granted for 913 units. This is a 10-year permission where it is envisaged the lands will be developed across multiple Development Plans. Taking this into account 600 (two-thirds) of the 913 units have been included in the Household allocation during this Development Plan.

<sup>42</sup> Includes provision for 30 no. social housing units

## Draft Plan

Column A	Column B	Column C	Column D	Column E	Column F	Column G	Column H	Column I	Column J	Column K
Settlement	Population 2016	Projected population increase to 2027	Projected population 2027	Approximate households completed 2016-2019	Extant units not yet built	Household allocation 2020-2027 <sup>37</sup>	Potential units to be delivered on infill/brown field lands <sup>38</sup>	Quantum of land zoned for residential use (ha)	Quantum of land zoned for existing residential use (ha)	Quantum of land zoned for mix of uses (ha)
Regional Growth Centre										
Drogheda	6,527	3,300	9,827	113	572	1,631		178.73	118.59	5.00
Key Town										
Navan	30,173	5,900	36,073	781	924	3,204	1,936	79.61 <sup>39</sup>	568.78	96.1
Maynooth	0	1000 <sup>40</sup>	1000	0	0	500	0	21.36	0.19	0
Self-Sustaining Growth Town										
Dunboyne	7,272	3,300	10,572	48	119	2,002	1,180	73.32	127.96	33.19
Ashbourne	12,679	3,200	15,879	632	209	1,349	351	29.52	218.21	18.62
Trim	9,194	2,250	11,444	31	437	1,333	812	41.92	177.94	36.65
Kells	6,135	1,000	7,135	48	391	452	400	20.89	134.81	25.5
Dunshaughlin	4,035	2,200	6,235	470	1,156 <sup>41</sup>	1,003	82	33.08	110.52	15.26



Column A	Column B	Column C	Column D	Column E	Column F	Column G	Column H	Column I	Column J	Column K
Settlement	Population 2016	Projected population increase to 2027	Projected population 2027	Approximate households completed 2016-2019	Extant units not yet built	Household allocation 2020-2027 <sup>37</sup>	Potential units to be delivered on infill/brown field lands <sup>38</sup>	Quantum of land zoned for residential use (ha)	Quantum of land zoned for existing residential use (ha)	Quantum of land zoned for mix of uses (ha)
Self-Sustaining Towns										
Bettystown-Laytown-Mornington East	11,872	1,500	13,372	689	518	746 <sup>42</sup>	264	22.62	288.38	18.28
Ratoath	9,533	1,500	11,033	175	72	803	101	25.59	187.12	14.54
Duleek	4,219	500	4,719	36	85	336	250	10.9	95.83	6.14
Enfield	3,239	1,000	4,239	45	135	474	84	15.79	49.21	16.47
Stamullen	3,361	500	3,861	1	215	290	58	11.8	56.07	8.72
Kilcock	93	500	593	100	180	180	0	8.79	15.5	0
Small Towns										
Athboy	2,445	350	2,795	34	127	200	100	16.37	56.6	14.62
Oldcastle	1,383	350	1,733	16	0	166	110	9.78	34.51	13.23
Ballivor	1,809	100	1,909	0	0	40	40	1.93	39.63	7.09
Longwood	1,581	200	1,781	16	68	104	20	1.24	28.81	4.89
Villages	10,540	2,025	12,565	178	318	840	484	50	263.75	47.40

Rural nodes and open countryside	68,948	3,125	72,079	300	c.300	1,336	N/A	N/A	N/A	N/A
<b>Total</b>	<b>195,044</b>	<b>33,800</b>	<b>228,800</b>	<b>3,713</b>	<b>5,820</b>	<b>16,958</b>	<b>6,272</b>	<b>653.24</b>	<b>2572.41</b>	<b>382.7</b>

**Table 2.11: Core Strategy Table, Population and Household distribution to 2026**

<sup>37</sup> This figure does not include the units completed 2016-2019. The calculation of the household allocation has factored in the 'pent up' demand for housing which has resulted in an increase in the average household occupancy rate for existing households. As the housing market continues to normalise and supply begins to meet demand it is anticipated that the average household occupancy rate for both existing and new households will begin to decrease.

<sup>38</sup> This includes both greenfield and brownfield sites in the built up area of each settlement and consists of lands zoned for town centre, mixed use, and residential development. For clarification these units have been included in the Household allocation.

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<sup>42</sup> Includes provision for 30 no. social housing units

### Proposed Plan

Updates on foot of changes to Table 2.11 shall be reflected throughout Volume 1 and Volume 2 of the Draft Plan

<b>Submission No.:</b>	MH-C5-60
<b>Submitted by:</b>	Eastern and Midland Regional Assembly
<b>Submission Theme(s):</b>	Chapter 1 – Introduction, Chapter 2 – Core Strategy, Chapter 3 Settlement Strategy, Chapter 4 – Economic and Employment Strategy, Chapter 5 – Movement Strategy, Chapter 6 – Infrastructure Strategy, Chapter 7 – Community Building Strategy, Chapter 8 – Cultural Heritage Strategy, Chapter 9 – Rural Development Strategy, Chapter 10 – Climate Change Strategy, Chapter 11 – Development Management Standards and Land use Zoning Objectives,
<b>Summary of Submissions:</b>	
<p>The submission by the Eastern Midland and Regional Assembly (EMRA) covers a number of chapters and these will be addressed in turn below. The submission acknowledges that Meath County Council had commenced the preparation of the new County Development Plan prior to the adoption of the RSES with a pre-draft consultation process in 2016 and accordingly, with the adoption of the RSES on 28th June 2019, has now recommenced this process, in accordance with Section 24(9) of the Planning and Development Act 2018.</p> <p>EMRA welcomes the explicit recognition that this Development Plan has been influenced by a number of strategic national and regional policy documents, primarily the NPF and the RSES, and the requirement to prepare a core strategy for the County, which must be consistent, as far as practicable, with National and Regional development objectives as set out in the NPF and RSES.</p> <p>As part of the submission EMRA considers that the overall population and housing targets proposed in the core strategy and the policies and objectives contained in the Draft Plan are consistent with the RSES.</p> <p>Each of the specific issues raised will now be addressed in turn below:</p> <ol style="list-style-type: none"> <li>1. The overview is generally welcomed and supported. It is recommended that the overview would benefit from reference to the relevant NPF NSOs and RSES RSOs which set the overarching national and regional policy framework for the County Plan.</li> <li>2. The Council acknowledges the challenges in the formulation of the County Development Plan (CDP) in the absence of the updated Development Plan guidelines, and in particular in preparing the Core Strategy including projecting household allocation and projected occupancy rates at the County/Local Authority level. The Eastern and Midland Regional Assembly welcomes the attention given to explanatory narrative within the Core Strategy on the regional strategic context and framework provided by the RSES that will influence</li> </ol>	

and shape future growth and development in County Meath. The attention of the Council is drawn to the need for consistency of terminology with the RSES throughout the Draft Plan. In Section 2.4.2 specific reference should be made to the respective RSES settlement typologies including Regional Growth Centre and Key Towns designated in each of the policy areas within the Region, e.g. Drogheda is a designated Regional Growth Centre (not just a key settlement as stated under 2.4.2.2) within the Core Region. Similarly, the key settlements listed under Section 2.4.2.3 are the designated Key Towns within the Region along with Carlow/Graiguecullen (missing).

3. In relation to the Core Strategy the inclusion of a new map to designate a settlement strategy is welcomed, however, EMRA have produced an updated version of Map 2.1 and as such this map should be updated.
4. The Assembly welcome recognition that climate change is a cross cutting theme of the Plan central role in the implementation of Climate change policies and in promoting behavioural and attitude change towards climate change as supported in the Core Strategy by CS OBJ 13.
5. The settlement hierarchy that is outlined in the Settlement strategy is welcomed EMRA draw the attention of Meath County Council to RPOs 5.5 and 5.6 whereby the focus of future growth in the MASP will be on the prioritisation and delivery of strategic residential and employment development corridors.
6. CS OBJ 10 is welcomed; however, it is considered that the terminology “cross boundary statutory Joint Urban Area Plan (UAP)” and correct RPO 4.11 should be used in all references through the Draft Plan to be consistent with the RSES. The preparation of this plan is considered a priority. The assembly also welcomes the inclusion of CS OBJ 11 to prepare a cross boundary Joint Local Area Plan (LAP) for Maynooth in partnership with Kildare County Council, as set out in RPO 4.35.
7. Given the proposals to prepare the abovementioned joint plans it is recommended that land use provisions identified in the Draft Plan, for Drogheda and Maynooth are to be identified as provisional, subject to the cross boundary Joint LAP and UAP and requirements of RPO 4.11 and 4.35 of the RSES. It is also recommended that the delivery of the statutory Joint UAP and LAP be stated as a matter of priority and reflected in the relevant core strategy objectives to be consistent with the RSES.
8. EMRA notes that Ashbourne is stated as transitioning to a metropolitan settlement/centre (SH OBJ 11 and Section 3.4.8) and is designated as a self-sustaining growth town. It is noted that Ashbourne is outside of the Metropolitan area and that this terminology should be revised to ensure consistency with the RSES.
9. EMRA also consider that having undertaken analysis of employment trends data for key settlements, as outlined in Figure 3.4 of the Draft Plan, Ashbourne has a low employment base and the lowest ratio compared to the other towns applied to the self-sustaining growth category. It is therefore recommended that Ashbourne be positioned as a self-sustaining town in the County Plan’s Settlement Hierarchy, to be consistent with the RSES.
10. The continued pressure for single homes in the rural area across County Meath is recognised with a focus on investment in rural towns, villages and rural nodes to combat the decline of rural areas. In this regard, the Assembly welcomes the regeneration of vacant and underutilised lands alongside the roll out of a ‘New Homes in Small Towns and Villages’ initiative (aligning with NPF NPO 18b and RPO 4.78 of the RSES) between local authorities, infrastructure agencies, and local communities to provide opportunities to boost economic development and rejuvenate rural communities as supported by Core Strategy objective CS OBJ 6 and rural development strategy objective Rural OBJ 13.
11. In relation to population it is recommended that the figures representing additional ‘MASP allocation’ be omitted from Table 2.11 of the Draft Plan (and Vol 2 Maynooth

Environs written statement), and that the Tables and accompanying footnotes be amended to reflect existing population targets set out in in Appendix B of the RSES (SPA and County Population Tables), unless and until the overall transitional population targets for the MASP are agreed.

12. EMRA considers the overall split of population specified as part of the County Plan to date, is generally consistent with the growth strategy for the region as set out in the RSES.
13. EMRA generally welcomes the approach to compact growth outlined in the Draft Plan. Meath County Council is directed to RPO 8.1 and the relevant Guiding Principles expressed in the Transport Strategy (Section 8.3) and MASP (Section 5.3) of the RSES which provide the basis for the integration of land use and transport in statutory land use plans. The principles require sequential development supported by accessible and sustainable travel patterns, with a particular focus on increasing the share of active modes (walking and cycling) and public transport use and creating a safe attractive street environment for pedestrians and cyclists.
14. The figures set out in the Core Strategy Table 2.11 are to be regarded as a 'guide' as to the level of growth anticipated in each settlement during the plan period, however, the attention of the Council is brought to an error in the allocated household totals for the self-sustaining growth towns and the self-sustaining towns set out in Table 2.11 and 2.12. The table totals do not appear to be consistent with each other (overall totals 16,669 vs 16,892). In addition, the Council's attention is drawn to the Duleek Written Statement Volume 2 where the core strategy housing allocation indicates 303 units while the figure is stated as 336 units in Table 2.11.
15. In terms of land use zoning, the Draft Plan references the two-tier approach as detailed in Appendix 3 of the NPF, however the Council have not formally adopted this approach in the absence of Development Plan guidelines and have not defined Tier 1 and Tier 2 lands. It is recommended that zoning maps should indicate lands which are serviced and available for development based on the capacity analysis conducted to date.
16. In addition, the Draft Plan has also retained a 'post 2026' reserve of residential lands in the larger settlements Dunboyne, Navan, Dunshaughlin and Kilcock Environs, accompanied by a justification statement (Table 2.4) and settlement strategy objective SH OBJ 4 'order of priority'. All residential and employment developments should be planned on a phased basis in collaboration with infrastructure providers so as to ensure adequate capacity for services, and so that the assimilative capacity of the receiving environment is not exceeded, in accordance with RPO 4.2. It is recommended that the phasing of lands, on this basis, should be indicated on the zoning maps.
17. With regard to Kilcock Environs, and the retention of Phase 2 lands, it is noted that a review of the flood zones for the town is required as indicated by the Draft Plan's SFRA and INF POL 26. The Council is directed to RPO 7.12 of the RSES whereby land use plans shall seek to avoid land use zonings and development in areas at risk of flooding. It is recommended that all future zoning of lands for development in areas at risk of flooding shall follow the sequential approach set out in the Planning System and Flood Risk Management Guidelines.
18. A number of Masterplans are identified for the Key Town of Navan to support an integrated approach to the phasing, management and development of strategic lands within the Key Town, which is welcome. The Draft Plan would benefit from a consistency of approach to future development in the other settlements to ensure and promote the long term growth of County Meath and alignment with the principles of sustainable growth envisioned in the NPF and RSES.
19. A new masterplan area comprising an additional landbank is indicated for Ashbourne to the south east of the town. It is recommended that the Council review additional zonings

based on the town's appropriate position in the hierarchy as a self-sustaining town. As aforementioned, Self-Sustaining Towns are towns that require a policy response focused on consolidated sequential development and targeted investment.

20. The Economic Strategy outlined as part of the Draft Plan is generally welcomed. The Assembly suggests that an overall policy translating the importance of strategic development areas along the MASP's north-west corridor should be included within the suite of policies for Economic Development as identified in Table 5.2 and aligning with RPO 5.6 of the RSES. The Assembly welcome the objectives relating to creating synergies between Dunboyne North and the Key Town of Maynooth with respect to educational and collaborative partnerships.
21. The attention of the Council is brought to ED OBJ 24 and MOV POL 5 relating to the extension of the Dunboyne/M3 Parkway line to Navan, which will be subject to 'reappraisal' during the Mid Term Review of the GDA Transport Strategy, following the Ministerial Direction to the RSES, January 2020. Consistency of references to the subject rail line should be made across the Draft Plan.
22. EMRA have also noted that they welcome the provision of policies to support rural economic activity as well as the provision of policies to support tourism, pursuing green and sustainable approaches to economic development, collaboration and partnerships.
23. EMRA welcome ED POL 29 promoting and encouraging Navan Key Town as a Level 2 County (Principal) Town Centre. The attention of the Council is drawn to the Retail Hierarchy set out in the Draft Plan which, in part, does not align with RSES Table 6.1 Retail Hierarchy for the Region. Level 3 Town and/or District Centres and Sub-County Town Centres in County Meath according to Table 6.1 of the RSES include Ashbourne, Dunshaughlin, Kells, and Trim with Laytown/Bettystown designated a Key Service Centre. Dunboyne and Enfield have also been included at Level 3 in the Draft Plan. While the need for the preparation of a new retail strategy for the Region is recognised in the RSES (RPO 6.10 refers), it is recommended that consistency with RPO 6.11 of the RSES is sought whereby future provision of significant retail development shall be consistent with the Retail Planning Guidelines for Planning Authorities 2012, or any subsequent update, and the retail hierarchy for the Region, expressed in Table 6.1 of the RSES, until such time as this hierarchy is updated.
24. EMRA welcomes the explicit recognition to RSO 6 of the RSES and the Council's attention is drawn to the Guiding Principles set out in Chapter 8 that provides the basis for the integration of land use and transport planning in land use plans (RPO 8.1) and reference to same in MOV POL 1 would be appropriate for policy alignment with the RSES.
25. The attention of the Council is drawn to MOV POL 5, 6 7 relating to the delivery of rail projects and consistency to Table 8.2 of the RSES, which has been updated on foot of the Ministerial Direction. EMRA support the reappraisal of Phase 2 of the Navan Rail Project to improve public transport links to the Key Town.
26. The attention of the Council is brought to RPO 7.43 advising local authorities to consider the identification of Critical Infrastructure (CI) within their functional areas, and particularly of the interdependencies between different types of sectoral infrastructure, as a first step in 'future-proofing' services and to help to inform longer term adaptation planning and investment priorities.
27. In terms of the use of Sustainable Urban Drainage Systems (SuDS), detailed measures should also be incorporated into the forthcoming local area plans with a focus on enhancing biodiversity, amenity and the protection of environmentally sensitive sites, in accordance with RPO 7.15.
28. EMRA welcome INF OBJ 73 supporting the data collection to support the regional air quality and greenhouse gas emissions inventory – there is a small error in the wording, it should state "support the collation of air quality..."

29. EMRA generally welcome the policies provided as part of the Community Building Strategy. The Assembly notes that the Meath Local Economic and Community Plan (LECP) 2016-2021 will require review in order to consider strategies and investment plans and align with the RSES. Section 9.5 of the RSES and its related RPOs supports the importance of the role of the LECPs to effectively plan for social infrastructure needs. The Council is also directed to Section 6.4 of the RSES which highlights the role of the LECP in enterprise development and the rural economy.
30. The Assembly welcomes SOC POL 28 to facilitate and support the Health Service Executive and the Department of Health in the provision of a new Regional Hospital in Navan, aligning with RPO 4.4 for Navan Key Town. The Assembly welcomes SOC OBJ 12 to prioritise the delivery of regional scale parks in Drogheda Southern Environs, Dunboyne and Ashbourne, in accordance with RPO 9.17.
31. The Cultural and Natural Heritage Strategy is generally welcomed and the recognition of the Green Infrastructure Network is particularly noted. The attention of the Council is directed to the Guiding Principles for the preparation of Green Infrastructure strategies set out in Chapter 7 of the RSES. In terms of coastal resilience (HER OBJ 43, 44) the attention of the Council is drawn to Integrated Coastal Zone Management (ICZM) supported by RPO 7.3 of the RSES, as a coherent policy for the sustainable management of all aspects of the coastal zone.
32. EMRA note and welcome the proposed Rural Development Strategy that aligns with RSES RSO 3 and the RPO's on the rural area. The Assembly also welcomes the emphasis on farm diversification for new employment opportunities to sustain rural communities through policy RUR POL 18, 24 and objectives RUR OBJ 8, 9 and RUR POL 20 to work with the relevant Departments and stakeholders to support the agricultural and agri-business sector, as appropriate, to continue participation in what is likely to be a more challenging export market post Brexit.
33. EMRA welcomes the Climate Change Strategy which sets out the commitment of the Council to climate action and indicates where mitigation and adaptation strategies have been integrated into the core policies and objectives across the Draft Plan. This will support the implementation of the Meath Climate Action Strategy in accordance with the National Adaptation Framework (INF POL 45).
34. The Assembly notes the Baseline Emissions Inventory completed for the County referred to and presented in Section 10.5.3 of the Draft Plan. The narrative should align with the SEA Environmental Report which states that the inventory was completed in 2017 using 2012 baseline data to determine the major sources of emissions in the County.
35. The Assembly welcomes the mitigation strategy and the objectives enabling climate action across each of the relevant sectors. The attention of the Council is drawn to new EPA Guidance on SEA Statements and Monitoring, published January 2020, which provides best practice on devising meaningful monitoring measures, suitably detailed indicators and the frequency of monitoring and reporting. This guidance shall inform the iterative SEA process and preparation of the monitoring programme as part of the County Plan's SEA statement. The use of a Geographical Information System (GIS) based monitoring system to monitor and assess the implementation of the County Plan is a welcome addition.
36. The Council's attention is also drawn to RPO 3.6 and the preceding paragraphs of the RSES which outline the requirement of Development Plans to assess their impact on carbon reduction targets. The attention of the Council is also brought to the Climate Action Fund made available under the Department of Communications, Climate Action and Environment, and, in order to be availed of, requires policy support and potential projects should be identified within the Draft Plan.

37. EMRA note the Development Management Standards and Land use zoning objectives with not specific comments being provided.
38. The SEA, AA and SFRA provided as part of the Draft Plan are welcomed and the findings of these are considered acceptable.
39. The Assembly note the inclusion of the Plan's Monitoring and Implementation section as an Appendix. This section is key to the securing and monitoring of the implementation of the policies and objectives of the Plan and as such it is considered important that this section remain a distinct chapter of the main Vol 1 Written Statement as per the existing county development plan.

#### **Chief Executive's Response**

1. Meath County Council welcome the comments from EMRA that the Introduction Chapter provides an appropriate strategic overview of the Draft Plan and the proposed processes. In relation to the reference to the NSOs and RSOs it should be noted that Chapter 1 provides references to national and regional policy as part of Section 1.4.3 and Section 1.4.4 respectfully. The specific measures outlined in the NSOs and the RSOs are addressed as part of each individual chapter. In this regard it is not considered that an amendment to the Draft Plan is required.
2. Meath County Council welcome the acknowledgement by EMRA of the difficulty in preparing the Draft Plan given the statutory timeline that applies to the preparation of the Draft Plan as well as the difficulty in aligning same with the publication of the NPF and the RSES. This has been further complicated by the lack of Ministerial Guidelines as well as the impact of Covid 19 with the period of the Draft Plan now relating to 2021-2027. In the context of using a consistent set of terminology across the Draft Plan, it is considered appropriate to adopt the change noted by EMRA in relation to this matter. As such, the plan will be amended to ensure that settlements are appropriately referred to in the context of the settlement hierarchy e.g. Drogheda referred to as a 'Regional Growth Centre' rather than a 'key settlement'. It is also considered appropriate that the list of key towns outlined in Section 2.4.2.3 in the region will include Carlow/Graigcullen.
3. As per the submission made by EMRA, it is considered appropriate that Map 2.1 is updated.
4. The acknowledgement that climate change has been integrated across the Draft Plan is welcomed and this has been an important part of the preparation of the Draft Plan as reflected in the inclusion of Chapter 10 Climate Change. As per the CE Report response to submission MH-C5-816, it is noted that once updated guidelines for Development Plans are provided, the development plan will be reviewed to further strengthen relevant climate change goals.
5. It is considered that the importance of the MASP has been highlighted in the Draft Plan and the reference to the north-west corridor has been specifically noted in Section 2.4.3 and Section 4.7.1.2 of the Draft Plan. As such, it is not considered that further changes to the Draft Plan are required.
6. Meath County Council acknowledge the need for consistent terminology in relation to this matter and it is considered appropriate that this be updated as part of the Draft Plan. The inclusion of these policies will lead to the delivery of comprehensive plans for the important Regional Growth Centre of Drogheda and the metropolitan key town of Maynooth.
7. As noted in the response to the Office of the Planning Regulator (MH-C5-816), it is currently unknown when these joint plans will be finalized as they involve the collaboration of two Local Authorities. There may also be an issue of the stage of respective CDP delivery and these issues will influence resource allocation and prioritisation within each Local Authority. As such, it is considered reasonable and



prudent that the proposed zonings and settlement strategy for Maynooth Environs and the Southern Drogheda Environs should remain in place until the aforementioned Joint LAPs are adopted. Said plans which will replace the existing settlement statements and zoning objectives. The Chief Executive reiterates that the timely delivery of the joint Local Area Plans for both settlements will be a key priority for this Local Authority as part of the programme for Local Area Plans within the County.

8. Please refer to the response to the submission by the Office of the Planning Regulator (MH-C5-816). It is considered appropriate to amend this objective, however, it should be noted that the development of Ashbourne is strongly influenced by its proximity to Dublin and Dublin airport has a significant and growing employment base and it is thus considered that the town will continue to grow in a sustainable way in accordance with the RSES and CDP.
9. The 2010 Regional Planning Guidelines for the Greater Dublin Area included an acknowledgement that Ashbourne was 'transitioning towards Metropolitan character' which was an agreed position and strategy between Meath County Council and the Regional Authority Executive at that time. It was also envisaged that in the next review of the RPGs (which were subsequently replaced with the RSES) that the MASP boundary and settlements would be revisited and reviewed with a view to addressing the growth or decline of settlements in line with National Strategies. Unfortunately, the full review of the MASP settlements did not take place and the existing boundaries and settlements remained the same when the NPF and EMRA RSES were agreed. Ashbourne therefore remains outside the MASP area despite the fact that it is strategically located and has scale, mass and characteristics of other key towns already within the MASP area. Ashbourne is strategically located along the N2 close to the Meath-Fingal boundary. Its proximity to Dublin Airport and Dublin City centre has resulted in the population in the town increasing such that it is now the second largest town in the County and had a population of 12,679 in 2016. With a population increase of 11.7% in the period 2011-2016, Ashbourne recorded the highest population growth rate in the County during this period. It has the third youngest population in the country with an average age of 32.2. In relation to this observation, it is noted that the surveys in relation to the jobs ratio for these settlements was undertaken some time ago and is therefore outdated. Based on local research and analysis by Meath County Council, it is a fact that the jobs ratio for Ashbourne has significantly improved in the intervening period. For example, there are two significantly large employment generating developments that have been recently granted planning permission and include Dublin Aerospace (Planning Reg. Ref. No AA190803) and a Film Studio Complex (Planning Reg. Ref. No. AA180221 & AA200011). With regard to Dublin Aerospace, the Company has already relocated from Dublin Airport into an existing factory site in the town, and over the short term, will fully deliver 150 local jobs. Given the proximity of Ashbourne to the Airport, sister companies and ancillaries have already expressed further interest in relocating to Ashbourne. In relation to the Film Studio development, this proposal has significant jobs potential. The existing planning permissions referred to above have the potential for delivering circa 180 jobs in the refurbishment of existing commercial units as film studios but the real potential exists in recently acquired zoned employment lands by the company surrounding the existing Pillo hotel. The company have made a submission on the Draft CDP (See submission MH-C5-761) for major rezoning and hope to generate up to 1500 jobs in the longer term at their site in Ashbourne. It is considered that this film studio has the potential to become the equivalent of Pinewood Studios in the UK. These investments are considered significant and shall provide significant economic returns for the local economy, but more importantly, reinforces the role and function of the Ashbourne within the Greater Dublin Area.

10. Meath County Council note and welcome EMRAs acknowledgement of the approach taken in the Rural Development Strategy as part of the Draft Plan. In relation to the promotion of rural towns and villages, it is noted as part of Section 4.11, the importance of Town and Village Renewal Scheme are noted and is in compliance with this government scheme. It is noted that in May 2020 a pilot project report, entitled Town Centre Living Pilot Initiative, Six Pilot Towns: Synthesis Report was published outlining lessons that could be learnt from the implementation of the scheme. It is also noted that since the onset of Covid-19, this scheme, as well as the Rural Development Investment Programme, provide accelerated measures so as to respond to new requirements on foot of the Covid-19 pandemic. It is considered appropriate to include a new policy to support the implementation of the Rural Development Investment Programme and the Town and Village Renewal Scheme.
11. As noted in the response to the submission by the Office of the Planning Regulator (MH-C5-816) an updated Table 2.11 has been prepared in response to matters raised in that submission. The transferred populations that are provided as part of the MASP allocations have been retained as part of this updated Table 2.11. It is noted that a variation to the draft plan can be made in the future once the population allocations in relation to MASP are finalised by EMRA.
12. The support provided by EMRA for the proposed approach is welcomed, however, due to delays relating to Covid-19 the Draft Plan period will now be 2021-2027. Please refer to the response to the submission by the Office of the Planning Regulator (MH-C5-816) for further details.
13. Meath County Council take full cognisance of the sequential and compact approach to development and seeks to develop lands in areas supported by sustainable travel patterns. Efforts to ensure the integration of land use and transport in statutory land use plans is reflected in MOV OBJ 1, which commits to the preparation of a Local Transport Plans for a range of settlements in County Meath which will inform the preparation of their respective Local Area Plans.

Insofar as possible, Meath County Council will endeavour to utilise lands in locations that benefit from public transport provision and which promote sustainable travel patterns subject to the availability of other services and site suitability. Given that County Meath suffers from considerable lack of investment and a deficit in the provision of public transport, Meath County Council strongly support working in conjunction with Transport Authorities to achieve more sustainable methods of travel in tandem with land-use development.

14. Table 2.11 of the Draft Plan has been updated as noted above. See response to OPR submission (MH-C5-816). The specific figures noted will be clarified and updated throughout the Draft Plan.
15. In relation to this matter, see the response provided to the OPR submission MH-C5-816, wherein it is outlined that in Section 3.5 of the Draft Plan, it is expected that the Updated Development Plan Guidelines being published by the Department will address the methodology for tiered zoning as identified in the National Planning Framework. Given the lack of guidance to date and the information that was available from infrastructure providers at the time of preparing the Draft Plan, it was not possible to outline a table such as that envisaged in the NPF.
16. In relation to this a matter, it is highlighted that the lands zoned as being "Post 2027" have been identified in the relevant maps provided with each settlement. As this has

been already addressed it is not considered that any amendments to the Draft Plan are required.

17. As part of the Draft Plan, a Strategic Flood Risk Assessment has been undertaken and this has informed the provision of all zoning objectives. It is noted as part of Section 6.10.2 that the SFRA was carried out in accordance with the Flood Risk Management Guidelines (2009) and it is considered that the proposed zonings accord with the approach of these guidelines.
18. As part of the Draft Plan, it is noted that there are a number of Masterplans identified for several locations throughout settlements in County Meath. As part of the response to MH-C5-381, an update list of all masterplans has been provided for all settlements in County Meath. As such, it is a consistent approach to the development of key land banks in respective towns. These masterplans shall be developer driven and shall be undertaken over the lifetime of the CDP. It is considered that this matter has been adequately addressed.
19. As part of the response to the OPR, MH-C5-816, it is considered that Ashbourne has been appropriately designated as a Self-Sustaining Growth Town and as such it is not intended to revise then approach to this town. Furthermore, it is considered that all zoning objectives within the Town reflect its status within the RSES and the CDP Settlement Hierarchy. There are no significant additions of New Residential zoning (A2) when compared to the existing Ashbourne LAP and they reflect the demand currently being experienced in Ashbourne for development. It is the view of the chief Executive that this is in the interests of the proper planning and sustainable development of the east Meath area as well as fulfilling the intentions of government housing policy such as Rebuilding Ireland. In relation to the additional Ashbourne masterplan (MP3) referred to in this submission, it is noted that the zoning of this land is now being amended and shall be included as a strategic employment site/zone which will provide attractive employment generating activities for the town and will further increase the jobs ratio which is a key objective of the settlement statement. Please refer to submission MH-C5-411 for the detail on the aforementioned rezoning.
20. As noted above, It is considered that the importance of the MASP has been highlighted in the Draft Plan and the reference to the north-west corridor has been specifically noted in Section 2.4.3 and Section 4.7.1.2 of the Draft Plan. It is therefore not considered necessary that further changes to the Draft Plan are required.
21. It is a long-held objective of the Council, the NTA's Transportation Strategy for the GDA, and the RSES, to reinstate the rail link to Navan. However, the delivery of the rail link is reliant on a definitive commitment on timeframe and the making of a new rail order.

In accordance with the EMRA RSES Ministerial Direction issued in January 2020 and consequent amendment to Section 5.6 and Table 8.2 of the EMRA RSES; MOV POL 5, MOV POL 6 and MOV OBJ 3 of the Draft County Development Plan will be amended to ensure consistency of the EMRA RSES and the NPF.

Recognising the critical role of public transport on the economic competitiveness of the county, the quality of life of residents and reduction of transport emissions, this amendment reinforces the commitment of Meath County Council to further progress the delivery of the Navan Rail link; a policy which will serve to reduce GHG emissions from transportation and contribute to the regions transition to a low carbon economy. Please refer to recommendations to the response of the OPR, MH-C5-816 for further detail

22. This observation is noted and welcomed. Meath County Council is of the view that as part of the 'live-work community' approach, outlined in ED OBJ 1, the provision of employment opportunities throughout the county is critically important in order to reduce the reliance on commuting. It is considered that this will be an important part of the implementation of the Draft Plan and that this will be supported by the Meath Economic Development Strategy 2014-2022 or any subsequent future review of same.
23. Having reviewed the comments of EMRA on this matter, it is noted that the proposed retail hierarchy as outlined in the Draft Plan requires updating to ensure compliance with Table 6.1 of the RSES. It is, however, considered that Dunboyne should be included as a Level 3 Centre in Table 4.1 of the Draft Plan. It is considered that this would be reflective of Dunboyne's role in the MASP area and its status as the only entire town in Meath located in the Dublin Metropolitan Area, the growth rates as outlined in the response to the OPR (MH-C5-816) and the quantum of existing retail floorspace, as outlined in Appendix 4 of the Draft Plan Meath Retail Strategy 2020 – 2026. In this regard, the existing level of convenience retail exceeds that of a local centre scale (Level 4 Centre in Table 4.1) and it would, therefore, be inappropriate to include Dunboyne in this category. The development of convenience and comparison floorspace in Dunboyne will be undertaken in line with the Retail Planning Guidelines 2012 and it will be important as part of implementing the Draft Plan that any retail development does not impact on the primacy of higher tier centres such as Blanchardstown. This will be implemented in line with Section 11.8.1 Retail Development of the Draft Plan. As such, the required changes noted above will be included as part of the recommendations noted below.
24. As previously discussed, it is considered that the guiding principles of RPO 8.1 have been incorporated in to the Draft Plan. For example, RPO 8.1 has been noted in Section 5.2 Statutory Context of the Draft Plan. It is however considered appropriate to note RPO 8.1 as part of MOV POL 1. This change will be included as part of the recommendations noted below.
25. Support for the reappraisal of Phase 2 of the Navan Rail Project to improve public transport links to Navan is noted and welcomed. As previously stated, the delivery of a rail link to Navan will give rise to an array of economic, climate change and lifestyle benefits for residents of County Meath and is therefore the single greatest priority of Meath County Council future infrastructure developments.
26. In relation to the identification of Critical Infrastructure, it is considered that all such infrastructure are identified throughout respective chapters of the Draft Plan, notably Chapter 5 Movement Strategy (Table 5.1) as well as Chapter 6 Infrastructure Strategy. Meath County Council support the development of critical infrastructure across the county and its delivery by statutory bodies such as Irish Water, however, it is not considered necessary to repeat this list again in the CDP. It is considered that the list of critical infrastructure can be reviewed following updates of new Government Programmes and Initiatives as part of any proposed variation to the development plan or as part of the proposed local area plans to be prepared as outlined in CS OBJ 9.
27. The benefits of Sustainable Urban Drainage Systems (SUDs) are recognised and supported in INF OBJ 14, INF OBJ 15 and INF OBJ 25 of the Draft Plan. It is agreed that objectives supporting the application of Sustainable Urban Drainage Systems methods will also be included in Local Area Plans to ensure effective environmental management across County Meath.
28. The Chief Executive thanks EMRA for bringing the typographical error in INF OBJ 73 to our attention. This will be corrected in the publication of the final Plan.
29. This observation is noted and welcomed. It is noted that the RSES will be considered as part of the preparation of a new Local Economic and Community Plan and Local Area Plans.

30. This matter is noted and welcomed. The provision of a new hospital will be a key piece of infrastructure for Navan. It is also considered that the provision of a public park for Ashbourne is of significant importance to the residents of the town and this has been further addressed as part of submission MH-C5-411.
31. This observation is noted and welcomed. It is considered that the Draft Plan will provide appropriate levels of protection for heritage in County Meath and that policies/objectives in relation to same have been outlined as part of Chapter 8 of the Draft Plan. In preparing a green infrastructure strategy and in considering the enhancement of coastal defences to increase climate resilience of Chapter 7 and RPO 7.3 of the RSES will be considered.
32. The approach to rural development in the Draft Plan is of particular importance and as such the comments of EMRA and noted and welcomed.
33. Climate change is an important cornerstone of the Draft Plan and has informed the preparation of each section of the Draft Plan. Climate Change has been interwoven into all sections and policy of the CDP. Following consideration of the submission of the Office of the Planning Regulator MH-C5-816, a new objective is being included noting that the Draft Plan will be reviewed upon the adoption of the updated ministerial guidelines, specifically in relation to the climate change requirements.
34. It is considered that this change to the Draft Plan is acceptable so as to clarify the relevance of the data used to establish these baseline figures. This amendment will be included in the recommendations of the CE Report as outlined below.
35. This submission is welcome and Meath County Council is aware of the updated guidance in relation to this matter. These new guidelines will be included as part of the preparation of an SEA Monitoring process as well as the SEA Statement that will be prepared towards the end of the making of the County Development Plan.
36. The Draft Plan contains a suite of policies and objectives ranging from improvements in energy efficiency of building stock, development of sustainable transport modes and the promotion of renewable energy to reduce levels of greenhouse gas emissions. Following a recommendation from the OPR, and to further support for these objectives, the Transportation Department of Meath County Council have worked with the NTA to secure the current baseline modal split for a range of larger settlements in County Meath. Specific baseline data and targets have been made for sustainable modal changes in an effort to measure the reduction in transport related carbon emissions over the lifetime of the Development Plan.

Meath County Council are also committed to reviewing the Draft Plan, with particular regard to climate change guidance once updated Ministerial Guidelines on Development Plans are published. The Chief Executive notes the availability of the Eastern and Midlands Climate Action Regional Office to assist in the implementation of climate action strategies and supports the establishment of this office.

37. This observation is noted and welcomed.
38. This observation is noted and welcomed. Any proposed changes will be subject to SEA, AA and SFRA where relevant and determinations on these matters will be published as part of the material alterations process.
39. The observation has been considered and having reviewed the implementation and monitoring section it is considered more appropriate for this section to remain as an appendix. The layout and details provided as part of the Implementation and Monitoring section are considered to be different to that outlined in Volume 1 and the inclusion of an additional chapter at this time would be confusing and unnecessary. It is, however, considered appropriate to include an objective as part of the Core Strategy relating to implementing and monitoring the Development Plan.

## Chief Executive's Recommendation

1. No change recommended
2. Vol 1 Written Statement, Chapter 2, Section 2.4.2.3,

### Section 2.4.2.3 Gateway Region

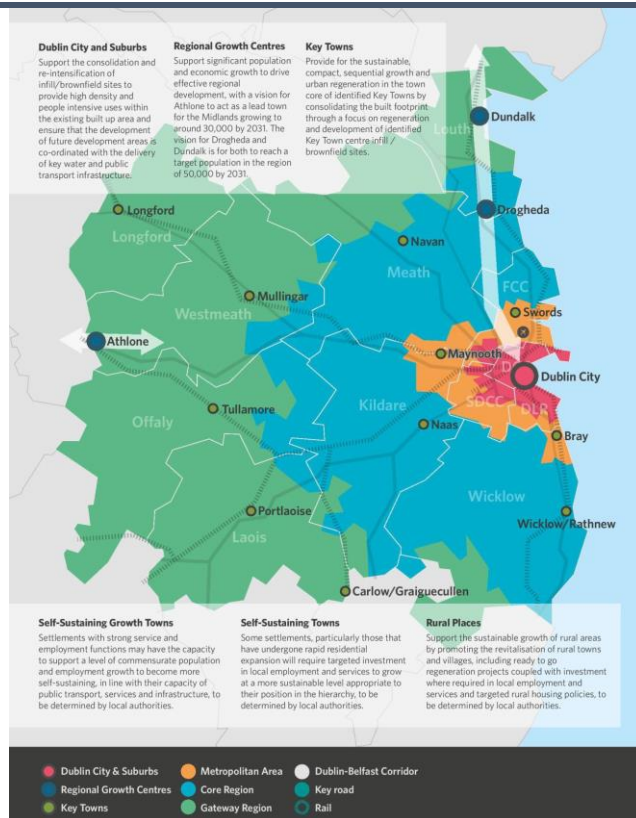
The Gateway Region comprises the remainder of the Eastern and Midland Region beyond the Metropolitan and Core Areas. Settlements in this part of the Region are more dispersed and rural. There is a focus on Athlone and Dundalk functioning as regional drivers for the economic growth of this part of the region. Other key settlements include Longford, Mullingar, Portlaoise, **Carlow/Graigucullen** and Tullamore.

This shall be reflected across the Draft Plan as and where required.

3. Vol 1 Written Statement, Chapter 2 – Core Strategy, Section 2.4.2.4, inclusion of updated Map 2.1:



**Draft Plan**



### **Proposed Change**

4. No change recommended
5. No change recommended
6. Change Recommended: Vol. 1 Written Statement and Vol 2 Settlement Statements: To update reference to towns in respect to their designation in the Settlement Hierarchy wherever necessary.
7. No change recommended
8. No change recommended
9. No change recommended
10. Vol. 1 Written Statement, Chapter 4 Economic and Employment Strategy, Section 4.11.1

### **ED POL XX**

**To support the implementation of the Rural Development Investment Programme and the Town and Village Renewal Scheme across the County and prepare for future funding opportunities from these initiatives or any new initiative that may replace these.**

11. Please refer to the response to the submission by the Office of the Planning Regulator (MH-C5-816).
12. Please refer to the response to the submission by the Office of the Planning Regulator (MH-C5-816).
13. No change recommended.
14. Please refer to the response to the submission by the Office of the Planning Regulator (MH-C5-816).
15. No change recommended.
16. No change recommended.

17. No change recommended.
18. No change recommended.
19. No change recommended.
20. No change recommended.
21. Please refer to the response to the submission by the Office of the Planning Regulator (MH-C5-816).
22. No change recommended
23. Change recommended: Vol 1, Written Statement, Chapter 4, Economic and Employment Strategy, Section 4.17, Table 4.1:

Level	Type of Centre	Centre	Type of services
Level 1		None	
Level 2	Major town centre/County Town	Navan	Level 2 centres should offer a full range of types of retail services from newsagents to specialist shops, large department stores, convenience stores of all types, shopping centres and a high level of mixed uses. Level 2 centres should be well serviced by public transport.
Level 3	Town And/Or District Centres and Sub County Town Centres	Ashbourne, Dunboyne*, Dunshaughlin, Kells, Trim, Laytown/ Bettystown, <del>Enfield</del>	Level 3 centres will vary in terms of scale of provision and the size of catchment. Generally where the town is not close to a major town such as Ashbourne/Dunboyne/ <del>Enfield</del> and there is a large catchment there should be a good range of comparison shopping with a mix of uses and services. At least one supermarket and smaller scale comparison department store to cater for local needs.
Level 4	Small towns, village and local centres	Various locations within the county including (although not exclusively) Athboy, Ballivor, Clonee, Duleek, <b>Enfield</b> , Kilmessan, Nobber, Oldcastle, Ratoath, Slane and Stamullen.	Level 4 centres should generally provide for one supermarket ranging in size with a limited range of local shops, supporting services such as a health centre, community facilities and recreation uses. This type of centre should meet the day to day needs of the local population and surrounding catchment.
Level 5	Small villages	Various locations	These centres should meet the basic day to day needs of the surrounding residents. These shops can present as a rural focal point with a local post office near to the local primary school or GAA club or as a small terrace of shops in an urban area such as



			Blackcastle Shopping centre in Navan.
Other		Southern Environs of Drogheda	Drogheda environs contain a relatively large quantum of retail development due to its association with Drogheda, a second tier centre in the national retail hierarchy. Southgate Shopping Centre (District Centre) is located at Colpe Cross on the southern fringe of Drogheda and includes a significant office component. The retail provision in Drogheda environs performs an important function in serving the needs of the local and surrounding communities.

\*Dunboyne will gradually develop over the next 20 years towards a Level 2 Centre in recognition of the status affirmed in the Retail Strategy for the Greater Dublin Area

The above table shall be reflected across Vol. 1 and Vol. 2 of the Draft Plan and shall be reflected in the Meath Retail Strategy 2020-2026.

24. Vol 1 Written Statement, Chapter 5 Movement Strategy:

MOV POL 1

To support and facilitate the integration of land use with transportation infrastructure, through the development of sustainable compact settlements which are well served by public transport, **in line with the guiding principles outlined in RPO 8.1 of the EMRA RSES 2019-2031.**

- 25. Please refer to the response to the submission by the Office of the Planning Regulator (MH-C5-816).
- 26. No change recommended
- 27. No change required.
- 28. Change recommended: Vol. 1 Written Statement, Chapter 6 Infrastructure Strategy, INF OBJ 73:

INF OBJ 73

To support the collation ~~of~~ **of** air quality and greenhouse gas monitoring data in support of a regional air quality and greenhouse gas emission inventory.

- 29. No change recommended
- 30. No change recommended
- 31. No change required
- 32. No change recommended
- 33. No change recommended
- 34. Change recommended: Vol. 1 Written Statement, Chapter 10, Section 10.5.3:

### 10.5.3 Emissions sources in the County

County Meath completed a Baseline Emissions Inventory in ~~2012~~ **2017, that was based on 2012 data, so as** to determine the major sources of emissions in the county. This generated an indicative picture of Meath's current and projected energy footprint, which equated to a total of 1, 453 CO2 equivalent kilotons.

- 35. No change recommended
- 36. No change recommended
- 37. No change recommended
- 38. No change recommended
- 39. Change recommended: Volume 1, Chapter 2, Section 2.14.2:

#### **CS OBJ XX**

**To undertake, over the lifetime of the Plan, the measures outlined in Appendix 15 relating to the Implementation & Monitoring of the Plan**

<b>Submission No.:</b>	MH-C5-802
<b>Submitted by:</b>	Department of Culture Heritage and the Gaeltacht
<b>Submission Theme(s):</b>	Chapter 8 Cultural and Natural Heritage Strategy
<b>Summary of Submission:</b>	
<p>This submission outlines the archaeological heritage observations of the National Monuments Service (NMS) and the nature conservation recommendations of the National Parks &amp; Wildlife Service (NPWS) from Department of Culture, Heritage and the Gaeltacht (DCHG).</p> <p>NMS request that the Council notes the recent publication of the Built &amp; Archaeological Heritage climate change Sectoral Adaptation Plan (Department of Culture, Heritage and the Gaeltacht, September 2019) and should reference this plan at appropriate locations in the text.</p>	
<b><u>Comments in relation to Monuments in State Care</u></b>	
<b><u>Volume 1, Chapter 4</u></b>	
<b>1.Section 4.24 Tourism:</b> Any proposed tourism strategies should take account of the guidelines in the ICOMOS Charter for the Interpretation and Presentation of Cultural Heritage Sites	

(available

at:

[http://icip.icomos.org/downloads/ICOMOS\\_ Interpretation\\_Charter\\_ENG\\_04\\_10\\_08.pdf](http://icip.icomos.org/downloads/ICOMOS_ Interpretation_Charter_ENG_04_10_08.pdf))

**2. ED POL 38 (page 134):** It should be noted that the facilities referred to will be developed in conjunction with OPW and DCHG.

**3. ED POL 40 (Page 135):** An internationally accepted definition of sustainable tourism in relation to cultural heritage should be included in the plan. Consideration could be given to developing a 'code of respect' for visitors to heritage sites in order to help visitors understand how they can avoid having a negative impact.

**4. ED POL 41 (page 134):** To be undertaken with OPW and DCHG and in accordance with the National Monuments Acts 1930 to 2014.

**5. ED POL 47 (page 136):** To be undertaken in conjunction with OPW and DCHG.

**6. ED POL 56 (page 139):** To be undertaken in conjunction with OPW and DCHG.

## **Chapter 6**

7. INF POL 14 (p.194): Provision of water services should take place with appropriate regard to heritage impacts and in consultation with DCHG in relation to such impacts.

8. 6.14 (page 205): 'Climate Change': Reference to Built and Archaeological Heritage Climate Change Sectoral Adaptation Plan (DCHG 2019).

## **Chapter 7**

9. 7.7.9 SOC POL 46: Cross reference to Guidance for the Care, Conservation and Recording of Historic Graveyards (The Heritage Council. Available at: [https://www.heritagecouncil.ie/content/files/guidance\\_care\\_conservation\\_recording\\_historic\\_graveyards\\_2011\\_7mb.pdf](https://www.heritagecouncil.ie/content/files/guidance_care_conservation_recording_historic_graveyards_2011_7mb.pdf) ). There may also be education and community opportunities within this. Reference should be made to the National Monuments Acts 1930 to 2014.

## **Chapter 8**

10. HER POL 1: Replace existing text with: "To protect sites, monuments, places, areas or objects of the following categories:

- Sites and monuments included in the Sites and Monuments Record as maintained by the National Monuments Service of the Department of Culture, Heritage and the Gaeltacht;

- Monuments and places included in the Record of Monuments and Places as established under the National Monuments Acts;
- Historic monuments and archaeological areas included in the Register of Historic Monuments as established under the National Monuments Acts;
- National monuments subject to Preservation Orders under the National Monuments Acts and national monuments which are in the ownership or guardianship of the Minister for Culture, Heritage and the Gaeltacht or a local authority;
- Archaeological objects within the meaning of the National Monuments Acts; and
- Wrecks protected under the National Monuments Acts or otherwise included in the Shipwreck Inventory maintained by the National Monuments Service of the Department of Culture, Heritage and the Gaeltacht.”

11. Reference should be included in relation to the national policy on protection of the Archaeological Heritage, the Framework and Principles for the Protection of the Archaeological Heritage (Government of Ireland 1999) with a clear statement that the policies set out in that will be taken into account and implemented appropriately through the planning process.

12. HER OBJ 4: ‘in consultation with DCHG and the OPW

13. HER OBJ 13: ‘and their historic core’

14. 8.14 Wetlands: Cross reference to archaeological potential and value of wetlands.

15. 8.14 Coastal Zone: Cross reference to archaeological potential and value.

16. 8.17.8 HER POL 54: To be undertaken in conjunction with OPW and DCHG.

17. Section 8.4 (page 263) states that the current text is not entirely accurate as EU Directives are not signed and ratified, they are binding on Ireland as legislative acts of the EU. The Department propose the following alternative text:

*‘Ireland has ratified a number of key international conventions in the field of cultural and natural heritage. Ireland gives effect to the obligations it has so undertaken through the relevant provisions of its own domestic law, including relevant aspects of the National Monuments Acts, the Wildlife Acts and the Planning and Development Act 2000 (as amended). EU law (in particular the Birds and Natural Habitats Directives and the Environmental Impact Assessment Directive), and domestic implementing measures in that regard, is of great importance in regard to heritage protection’.*

#### Section 8.4, page 263

18. The submission asks that the current text be expanded to read as follows:

*“The National Monuments Acts provide for the protection of monuments and national monuments through a range of provisions administered by the Minister for Culture, Heritage and the Gaeltacht. The most widely applicable is the Record of Monuments and Places (RMP). A person proposing work at or in relation to a monument or places included in the RMP must give the Minister two months’ notice of the proposed work, which may not proceed within the two-month period other than in case of urgent necessity and with the consent of the Minister. Similar protection applies to historic monuments and archaeological areas entered in the Register of Historic Monuments. Where the Minister has made a national monument (i.e. a monument the preservation of which is a matter of national importance) subject to a preservation order, alteration or interference with the national monument or ground disturbance around or in proximity to it may not take place other than with the consent of the Minister. This also applies to national monuments of which the Minister or the local authority are owners or guardians. There are further provisions for the protection of historic wrecks and the protection of archaeological objects. In addition, a number of activities (archaeological excavation and use of detection devices in specified circumstances) are subject to regulation under the Acts.”*

#### Section 8.4.3, page 264

19. It is suggested that existing text be replaced with the following with regard to the Valetta Convention:

*“The aim of the Valletta Convention is to ‘protect the archaeological heritage as a source of the European collective memory and as an instrument for historical and scientific study’ (Article 1). The provisions of the convention deal with statutory protection measures and maintenance of an inventory of the archaeological heritage, authorisation and supervision of archaeological activities, measures for the physical protection of archaeological heritage. It also provides for the consultation between archaeologists and planners in drawing up development plans and schemes. Further provisions are made for educational aspects and information exchange between states that have signed the convention.”*

#### 20. Section 8.6, page 265

The following additions (in bold) to the existing text are suggested:

‘Archaeology is the **systematic** study of **past** human societies...’**‘Uniquely archaeology provides insights into** periods and civilisations that existed prior to written records.’

HER POL 4, page 266

Please replace ‘...by a licensed archaeologist’ with the following:

...by a suitably qualified archaeologist.

## 21. Comments in relation to Brú na Bóinne World Heritage Site:

**MOV OBJ 33 (page 169):** in Section 5.8 ‘Developments of National and Regional Strategic Importance’ the last line should include ‘where adverse effects on European sites and the UNESCO World Heritage Site’

**Section 8.4 (page 263) ‘Statutory Context’:** This section should include the World Heritage Convention 1972, which Ireland ratified on the 16 September 1991.

**Section 8.4.2 (page 263):** ‘The National Monuments Acts 1930-2004’ should be updated to ‘**The National Monuments Acts 1930 to 2014**’.

**Section 8.6.2 (page 268):** ‘Sustaining the Outstanding Universal Value’: Please note the *Operational Guidelines for the Implementation of the World Heritage Convention* were updated in 2019 (latest version available here: <https://whc.unesco.org/en/guidelines/>)

**Section 9.5.4 (page 315) ‘Rural Nodes’:** One of the ‘Rural Nodes’ noted is Monknewtown. Please note the eastern part of Monknewtown townland is within the Buffer zone of Brú na Bóinne World Heritage Site.

### Volume 3: Book of maps

Map 8.1 does not depict the southern extent of the core area of Brú na Bóinne World Heritage site

### Nature Conservation

22. HER POL 27 is welcomed. It is suggested that the text ‘*wherever possible*’ in HER POL 28 undermines the commitment made in HER POL 27 and that this text should be removed to strengthen the Plan’s commitment to biodiversity and in accordance with the *National Biodiversity Plan 2017-2023* would ‘*Mainstream biodiversity into the decision-making across all sectors*’ in accordance

23. The Department recommends that HER Pol 37 (*'To encourage the retention of hedgerows and other distinctive boundary treatments in rural areas and prevent loss and fragmentation, where practically possible.' Where removal of a hedgerow, stone wall or other distinctive boundary treatment is unavoidable, mitigation by provision of the same type of boundary will be required'*) is strengthened by replacing the words 'To encourage' with 'To ensure' and removal of the words 'where practically possible'

24. The Department notes the commitment to peatland conservation in the Draft Plan in the Cultural and Natural Heritage Strategy (Section 8 of the Draft Plan). The Department recommends that the requirements of the National Peatland Strategy and the National Raised Bog SACs Management Plan 2017-2022 are reflected in the policy framework in relation to peatlands in the Plan. The submission notes a recent decision by An Bord Pleanála (ABP-305340-19).

25. Weirs and bridge sills within SACs may be a barrier to fish migration. It is suggested that there is scope for barrier removal in conjunction with Local Authority projects such as bridge repair and such synergies should be explored with Inland Fisheries Ireland.

#### **26. Development Management Standards and Land Use Zoning Objectives**

The CDP has a statutory obligation in relation to nature conservation and the Department would recommend including an overarching policy within Chapter 11 that all development proposals include measures to protect and enhance biodiversity and reference the National Biodiversity Plan 2017-2021..

- **Section 11.10.5 Anaerobic Digester:**

The Department recommends that Meath County Council include Air Pollution as a key consideration when siting Bioenergy Projects.

- **Section 11.7.10 Boundary Treatments**

The Department recommends that a clear policy to protect, conserve and enhance field boundaries as part of all development proposals is included in this chapter to ensure the Natural Heritage objectives of the CDP can be met. It is stated that mitigation measures, aimed at ensuring the habitat fragmentation does not occur, should be incorporated into any development proposals where field boundaries must be removed.

#### **Observations in relation to Land Use Zoning:**

27. The Department notes that that many important sites for nature conservation (SACs and SPAs) have been zoned as 'high amenity' within the land zoning maps that accompany this draft development plan. The Department recommends that the Council reviews the zoning applied to these sites to ensure that they are zoned appropriately in light of the Council's statutory obligation in Section 177S of the Planning and Development Act 2000 (as amended).

28. The Department notes there are a number of objectives with the draft CDP for development and promotion of greenways and blueways within and adjacent to European designated sites. The

Department recommends that several potential routes are considered in the development of greenway and blueway proposals in order to ensure the negative impacts to European sites are avoided in the first instance. Project appraisal and consideration of a number of route options, as outlined in the Common Appraisal Framework for Transport Projects and Programmes<sup>2</sup>, is suggested a way of doing this.

29. Settlement 5, Settlement 17 and Settlement 35 Bettystown/Laytown/Mornington East/Donacarney/Mornington, Julianstown and Southern Environs of Drogheda:

The Department advises the council to consider inclusion of a long-term strategic policy within the CDP to ensure development pressure at the coast does not inadvertently threaten internationally important bird species protected within the nearby Special Protection Areas (i.e. Boyne Coast and Estuary and The Nanny Estuary and Shore SPAs). In accordance with draft HER POL 34 (to ensure the ecological data and scientific knowledge is available to assist the council in meeting its obligations under Article 6 of the Habitats Directive), bird usage surveys of these *ex-situ* sites it is suggested could be used to inform land use zoning decisions in this area ,including of developments associated with BLMD OBJ 4 (proposal to develop a 638.35 ha site as a Strategic Employment Site) within Volume 2 East Meath Written Statement.

30. Settlement 18 Kells

Japanese Knotweed (*Fallopia japonica*) has been recorded within the 'Backlands' site and measures should also be put in place to avoid the spread of this invasive plant species, which is listed within the third schedule of the European Communities (Bird and Natural Habitats) Regulations, 2011 (as amended).

The proposed zoning of a 4.48 ha conifer plantation along the R163 for new residential development. This site presently supports a breeding habitat for grey herons, the nests of which are collectively known as a heronry. The grey heron is a protected bird species under the Wildlife Act 1976 (as amended) and is associated with the nearby riverine habitat of the River Boyne and River Blackwater SAC and SPA. The council should ensure that the strategic objective to develop these lands contains appropriate mitigation measures to ensure the protection of this species.

31. Settlement 28 Navan

It is stated that objectives within the CDP should identify the legislative requirement to fulfil the obligations of the Habitats and Birds Directive in relation to all lower level plans and projects arising from this CDP.

**32. Observations in Relation to the Draft Natura Impact Report:**

It is stated that continued development of coastal greenfield sites should be addressed at a strategic level within the CDP and provisions put in place to ensure adequate lands remain available to



support the conservation of the birds listed for protection within the adjacent European sites, i.e. Boyne Estuary and the Nanny Estuary and Shore.

### **33. Observations on the Strategic Environmental Assessment (SEA):**

It is stated that Department would welcome a clear and specific monitoring plan to be included with the Strategic Environmental Report that would clearly outline how it is proposed to record the impacts of plan implementation on biodiversity, both in terms of biodiversity loss and biodiversity enhancement during the lifetime of the plan.

### **Chief Executive's Response**

**1. Section 4.24 Tourism:** The comments in relation to the ICOMOS *Charter for the Interpretation and Presentation of Cultural Heritage* are noted and it is proposed that the review of the Boyne Valley Tourism Strategy should have regard to this charter.

**2. ED POL 38 (page 134):** Meath County Council works in conjunction with OPW and the DCHG across a number of areas. It is proposed to amend the existing ED POL 38 to reflect that facilities will be developed in conjunction with the OPW and DCHG.

**3. ED POL 40 (Page 135):** The suggestion that an internationally accepted definition of sustainable tourism should be included in the plan is noted. The United Nation World Tourism Organisation (UNWTO) definition of sustainable tourism - *Tourism that takes full account of its current and future economic, social and environmental impacts, addressing the needs of visitors, the industry, the environment and host communities* - has been proposed for inclusion.

**4.** Due to a printing error ED POL 38 (hardcopy) and ED POL 41 (online version) are the same policy and will be amended as point 2 above.

**5. ED POL 47:** Meath County Council accepts that the ED POL 47 should be amended to reflect - To be undertaken in conjunction with OPW and DCHG.

**6. ED POL 56 (page 139):** Meath County Council accepts that the ED POL 56 should be amended to reflect - To be undertaken in conjunction with OPW and DCHG.

### **Chapter 6**

7. The council notes the comments that the provision of water services should have regard to heritage impacts and in consultation with the DCHG. There are numerous policies and objectives throughout the plan to safeguard the heritage of the county in the provision of infrastructural projects including water services.

8. 6.14 (page 205): Reference will be made to **'Climate Change': Reference to Built and Archaeological Heritage Climate Change Sectoral Adaptation Plan (DCHG 2019)**.

### **Chapter 7**

9. The best practice guidance document referenced will be footnoted on this page. It is considered that this guidance document will refer to the National Monuments Acts and consequent education and community opportunities.

### **Chapter 8**

10. It is proposed to replace the existing text of HER POL 1 with a text which reflects the classification of monuments in Ireland. The Council agrees that this defines and provides clarity on monument categories.

11. HER POL 2 should be amended to include the stated national policy on protection of the Archaeological Heritage as suggested.

12. It is considered that the best practice guidance document referenced in HER OBJ 4 and footnoted on this page sets out the consultation with the DCHG and OPW is best practice and in that regard is not necessary to repeat.

13. The council considers that HER OBJ 13 which commits to support the State in the nomination process of Tara and Kells to World Heritage Status as part of an assemblage of Royal and Monastic Sites in co-operation with the relevant Local Authorities and stakeholders would include core and buffer zone of any nominated property.

14. and 15. The council recognises the archaeological potential of wetlands (including the coast) and will cross reference within the text of 8.14.

16. Meath County Council notes that the implementation of HER POL 54 will involve working in co-operation with a number of stakeholders including the OPW and DCHG.

17. The DCHG states that the text of Section 8.4 does not entirely accurately reflect how EU Directives are translated/transposed into Irish law and suggests an alternative wording which the council accepts.

#### **Section 8.4, page 263**

18. Section 8.6 refers to [www.archaeology.ie](http://www.archaeology.ie) which is the online portal for the National Monuments Service and gives detailed information on monuments and their protection. Therefore, it's the council's view that it is not necessary to provide the level of detail as proposed given the high level and strategic nature of a County Development Plan.

#### **Section 8.4.3, page 264**

19. The suggested new text for the Valetta Convention is noted and an amendment is proposed.

#### **20. Section 8.6, page 265**

The council notes and accepts minor amendment to definition of archaeology. The second sentence has been deleted as recommended by submission (MH-C5-303), therefore amendment as proposed is not necessary.

#### **21. Comments in relation to Brú na Bóinne World Heritage Site:**

- **MOV OBJ 33 (page 169):** All development proposals requiring planning consent will be subject to the rigors of the planning process including all necessary environmental assessments, archaeological impact assessment, landscape and visual impact assessments, traffic, noise, etc. etc to ensure proper planning and sustainable development. In that regard there are a number of policies and objectives in the Draft Plan which relate to the protection of the Outstanding Universal Value of UNESCO WHS (for example (not an exhaustive list) - HER POL 1, HER POL 2, HER POL 3, HER OBJ 2, HER OBJ 3, HER POL 6, HER POL 8, HER OBJ 9, HER OBJ 11).
- It is proposed to update Section 8.4 (page 263) 'Statutory Context' to include the World Heritage Convention 1972
- The updated reference to National Monuments Acts is noted and text will be amended.
- The updated reference to *Operational Guidelines for the Implementation of the World Heritage Convention* is noted and text will be amended
- **Section 9.5.4 (page 315) 'Rural Nodes':** The Draft Plan recognises that there is an established nucleus of development in Monknewtown area which is concentrated on the church; cemetery; athletic club; GAA pitch; transport company; and, a number of established one-off dwellings which is removed from the crossroads at the National Secondary Route, the N51, at the existing pub. This area has been designated as a rural node. It is considered that this area has a limited capacity to support the sustainable delivery of rural-generated residential development and support for small-scale employment and community facilities for members of the rural community. That said,

special regard must be given to the presence of archaeological features and national monuments in the vicinity of Monknewtown; and, potential impacts upon views into Bru na Bóinne UNESCO World Heritage Site would also have to be carefully considered as Monknewtown is located within the Bru na Bóinne Buffer Zone.

- The council acknowledges this, and Map 8.1 will be amended to reflect the southern extent of the core area of Brú na Bóinne World Heritage site

### **Nature Conservation**

22. The County Development Plan, as acknowledged in this submission, contains a strong and clear commitment to protect and enhance the county's biodiversity (HER POL 27, HER POL 29, HER POL 30, HER POL 31, HER OBJ 31, refers) . The plan also contains an objective to implement in partnership with the Department of Culture, Heritage and Gaeltacht the objectives and actions of the *National Biodiversity Plan 2017-2021* as it relates to the remit and function of Meath County Council (HER OBJ 29). The wording in HER POL 28 does not in the council's opinion undermine this commitment but reflects that there may be applications where measures to enhance biodiversity may not be possible (i.e. change of use, small scale extensions etc).

23. In relation to the wording of HER POL 37 it is written to reflect that in some instances for traffic safety reasons it may not be possible to retain all hedgerows. It is noteworthy that where removal does take place as part of a development it is standard procedure to impose a planning condition to require that the applicant plant a native hedgerow as mitigation.

24. The comments in relation to the National Peatland Strategy and the National Raised Bog SACs Management Plan 2017-2022 are noted and these documents will be reflected in the text of section 8.11. The CDP is a high level and strategic document and it is not necessary in our opinion to refer to specific decisions of ABP. The outcome is ABP-305340-19 is noted and will be reflected by the Planning Department in the execution of their functions in Development Management.

25. Comments in relation to weirs and barriers is noted and it is the council's view that there is scope for barrier removal in the implementation of HER OBJ 33.

### **26. Development Management Standards and Land Use Zoning Objectives**

The National Biodiversity Action Plan 2017-2021 will be added to the policy context in Section 11.3.

#### **Section 11.7.10 Boundary Treatments**

The comments in respect of strengthening of DM POL 11 are noted and it is suggested to amend this policy accordingly.

#### **Section 11.10.5 Anaerobic Digester:**

The council notes the recommendation of the Department to include Air Pollution as a key consideration when siting Bioenergy Projects.

**Observations in relation to Land Use Zoning:**

27. The Council considers that a high amenity zoning is an appropriate zoning for important sites designated for nature conservation, as the objective of this zoning is 'to protect and improve areas of high amenity'. There are very limited permitted uses within this zoning category and any development proposals will be subject to compliance with normal planning considerations and the requirements for appropriate assessment. This is consistent with Development Plan Guidelines and implementation of zoning objectives by Local Authorities throughout Ireland.

28. The suggestion in relation to the development of a number of route options in relation to the advancement of greenway or blueways is noted.

29. Settlement 5, Settlement 17 and Settlement 35 Bettystown/Laytown/Mornington East/Donacorney/Mornington, Julianstown and Southern Environs of Drogheda:

The recommendation to undertake bird usage surveys of these *ex-situ* sites is noted and will be considered in the context of data collection to inform the development of the Local Area Plan. It is however important to note that no significant additions have been made to existing zoning objectives with each of the settlements and therefore represents the status quo. In addition, it is noteworthy that appropriate bird usage surveys have been requested by the council to inform the AA of proposed development in these areas.

**30. Settlement 18 Kells**

The Council notes the occurrence of Japanese Knotweed (*Fallopia japonica*) within the 'Backlands' site and the occurrence of a heronry in a conifer plantation along the R163 zoned for new residential development. Both issues are noted and have been communicated to the Development Management Team who will inform prospective developers at pre application discussions stage and further seek appropriate mitigation measures as part of any development proposals.

**31. Settlement 28 Navan**

All LAPs arising out of the CDP will be subject to SEA/AA in compliance with existing legislation (HER OBJ 32 refers).

**32. Observations in Relation to the Draft Natura Impact Report:**

Comments from the NPWS, are acknowledged and appreciated. The NIR will be reviewed and updated, where required.

**33. Observations on the Strategic Environmental Assessment (SEA):**

Comments from the NPWS, are acknowledged and appreciated. Comments in relation to monitoring will be reviewed and the ER updated, where required.

#### Chief Executive's Recommendation

1. No change required.
2. Amend ED POL 38 - To support the development of new tourist facilities or upgrading/ extension of existing tourist facilities at tourist sites within the County such as the Hill of Tara, Loughcrew and Trim Castle in **conjunction with OPW and DCHG in accordance with the National Monuments Acts 1930 to 2014 and** in accordance with proper planning and sustainable development principles. These facilities should avail of shared infrastructure and services where possible and will be designed to the highest architectural and design standards.
3. Include the United Nation World Tourism Organisation (UNWTO) definition of sustainable tourism as a footnote - ***Tourism that takes full account of its current and future economic, social and environmental impacts, addressing the needs of visitors, the industry, the environment and host communities***
4. As 2 above
5. Following text to be added to ED POL 47 - **To be undertaken in conjunction with OPW and DCHG.**
6. Following text to be added to ED POL 56 - **To be undertaken in conjunction with OPW and DCHG.**
7. No change required.
8. Section 6.14: Reference will be made to **'Climate Change': Reference to Built and Archaeological Heritage Climate Change Sectoral Adaptation Plan (DCHG 2019).**
9. Insert reference as footnote (p255 SOC POL 46) - **Guidance for the Care, Conservation and Recording of Historic Graveyards (2011)**
10. Delete HER POL 1 ~~To protect archaeological sites, monuments, underwater archaeology and archaeological objects in their setting, which are listed on the Record of Monuments and Places for Meath and~~ replace with the following text: **"To protect sites, monuments, places, areas or objects of the following categories:**
  - **Sites and monuments included in the Sites and Monuments Record as maintained by the National Monuments Service of the Department of Culture, Heritage and the Gaeltacht;**
  - **Monuments and places included in the Record of Monuments and Places as established under the National Monuments Acts;**
  - **Historic monuments and archaeological areas included in the Register of Historic Monuments as established under the National Monuments Acts;**
  - **National monuments subject to Preservation Orders under the National Monuments Acts and national monuments which are in the ownership or guardianship of the Minister for Culture, Heritage and the Gaeltacht or a local authority;**
  - **Archaeological objects within the meaning of the National Monuments Acts; and**
  - **Wrecks protected under the National Monuments Acts or otherwise included in the Shipwreck Inventory maintained by the National Monuments Service of the Department of Culture, Heritage and the Gaeltacht."**
11. Amend HER POL 2 as follows - To protect all sites and features of archaeological interest discovered subsequent to the publication of the Record of Monument and Places, in situ (or at a minimum preservation by record) having regard to the advice and

recommendations of the National Monuments Service of the Department of Culture, Heritage and the Gaeltacht and *The Framework and Principles for the Protection of the Archaeological Heritage (1999)*

12. No change required.
13. **No change recommended.**
14. Add the following sentence to section 8.14 ... **have archaeological potential...**
15. No change required as amendment above includes reference to the coast
16. No change required.
17. **Section 8.4 Statutory Context** – Delete the current text ~~The State has signed and ratified a number of International and European Conventions and EU Directives and in so doing agreed to abide by the principles contained therein. These Conventions and Directives have guided the formulation of national legislation and national and regional policy to protect the built and natural heritage and~~ replace with **‘Ireland has ratified a number of key international conventions in the field of cultural and natural heritage. Ireland gives effect to the obligations it has so undertaken through the relevant provisions of its own domestic law, including relevant aspects of the National Monuments Acts, the Wildlife Acts and the Planning and Development Act 2000 (as amended). EU law (in particular the Birds and Natural Habitats Directives and the Environmental Impact Assessment Directive), and domestic implementing measures in that regard, is of great importance in regard to heritage protection’.**
18. No change recommended
19. Section 8.4.3 delete ~~The Convention provides the basic framework for policy on the protection of archaeological heritage as a source of the European collective memory. The State undertakes to seek to reconcile and combine the respective requirements of archaeology and development plans by ensuring that archaeologists participate in planning policies, development schemes, development plans, environmental impact assessments and recommendations regarding the retention of elements of the archaeological heritage in-situ and~~ replace with **“The aim of the Valletta Convention is to ‘protect the archaeological heritage as a source of the European collective memory and as an instrument for historical and scientific study’ (Article 1). The provisions of the convention deal with statutory protection measures and maintenance of an inventory of the archaeological heritage, authorisation and supervision of archaeological activities, measures for the physical protection of archaeological heritage. It also provides for the consultation between archaeologists and planners in drawing up development plans and schemes. Further provisions are made for educational aspects and information exchange between states that have signed the convention.”**
20. The following additions (in bold) to the existing text are suggested:  
**‘Archaeology is the systematic study of past human societies...’**

*HER POL 4* Replace ‘...by a licensed archaeologist’ with the following: **...by a suitably qualified archaeologist.**

#### **21. Comments in relation to Brú na Bóinne World Heritage Site:**

- **MOV OBJ 33 (page 169):** No change required.
- It is proposed to update Section 8.4 (page 263) ‘Statutory Context’ to include the World Heritage Convention 1972
- Section 8.4.2: Delete 2004 and replace with 2014: The National Monuments Acts 1930 – 2004 **2014**

- Section 8.6.2: Delete 2013 and replace with 2019: Under the Operational Guidelines for the Implementation of the World Heritage Convention (July ~~2013~~, **2019**),
- **No change recommended.**
- Update Map 8.1 to show the southern extent of the core area of Brú na Bóinne World Heritage site

### **Nature Conservation**

22. No change recommended

23. No change recommended

24. Amend Edit Section 8.11: The Council will liaise with the various government and nongovernment organisations involved in an effort to secure the conservation of the peatland areas **having regard to National Peatland Strategy and the National Raised Bog SACs Management Plan 2017-2022.**

25. No change required.

### **26. Development Management Standards and Land Use Zoning Objectives**

**The National Biodiversity Action Plan 2017-2021** will be added to the policy context in Section 11.3.

Amend DM POL 11: To consider the retention of field boundaries ~~where such boundaries are of~~ **for their** ecological/habitat significance, as demonstrated by a suitably qualified professional. **Where removal of a hedgerow, stone wall or other distinctive boundary treatment is unavoidable, mitigation by provision of the same boundary type will be required**

### **Section 11.10.5 Anaerobic Digester: Amend as follows:** Key considerations include:

- Visual Impact;
- External Finishes.
- Sky lining.
- Residential Amenity;
- Transport;
- Road Capacity o Site Entrance
- Light Pollution;
- Nosie Pollution
- **Air Pollution**

27.No change recommended

28.No change recommended

29. No change recommended

30. No change recommended



**31. Add the following sentence to *Section 2.14 Core Strategy and SEA/AA*: All subsequent land use plans arising from Meath County Development Plan 2021-2027 will be subject to full environmental assessment such as Strategic Environmental Assessment and Appropriate Assessment in compliance with existing legislation.**

32. Review of NIR recommended, with update, where required.

33. Review of ER recommended, with update where required.

<b>Submission No.:</b>	MH-C5-624
<b>Submitted by:</b>	Department of Transport, Tourism and Sport
<b>Submission Theme(s):</b>	Chapter 5 Movement Strategy
<b>Summary of Submission:</b>	
<p>This submission welcomes the comprehensive Draft Plan and supports the recognition throughout the Draft Plan of the importance of aligning land use and transport policies. A summary of the submission and issues raised are as follows:</p> <ol style="list-style-type: none"> <li>1. The Draft Plan references the Government’s previous capital plan Building on Recovery: Infrastructure and Capital Investment 2016-2021 which has been superseded by the National Development Plan 2018-2027 (NDP) under Project Ireland 2040.</li> <li>2. The Draft Plan incorporates the Department’s 2015 Investing in our Transport Future – A Strategic Investment Framework for Land Transport (SIFLT) which must have due regard to Project Ireland 2040 National Strategic Outcomes. SIFLT will shortly be superseded by Planning Land Use and Transport: Outlook 2040 which will be a key consideration for future transport investment and strategies.</li> <li>3. The Draft Plan refers to Smarter Travel, A Sustainable Transport Future 2009-2020 and the National Cycle Policy Framework which will be superseded by a new sustainable mobility policy.</li> <li>4. References to the RTI should be renamed the Local Link Rural Transport Programme, and Flexibus Meath Accessible Transport Ltd renamed as Louth Meath Fingal Local Link on page 160 and footnote 13 in page 160.</li> <li>5. Regarding the issue of a potential extension of the existing Dunboyne/M3 Parkway line it was determined that the level of travel demand between Navan and various stations to the city centre was insufficient to justify the development of a rail link at the current time. The NTA has committed in the Strategy to undertake and evaluate the case for a rail link to Navan as</li> </ol>	

part of its statutory review of the Strategy but does not commit to implementation. This will take into account the scale of new and planned development

#### **Chief Executive's Response**

The Chief Executive notes the supportive comments and recommendations of the Department of Transport, Tourism and Sport and agrees to amend the Draft Plan as necessary to incorporate the necessary updates referenced by the Department and in particular a rail link to Dublin. The commitment to review and evaluate the case for a rail line to Navan is very much welcomed and it is a key tenet of this Plan that this line must be prioritised as Navan is one of few County Towns in proximity to Dublin of its scale and size that does not have any significant public transport provision.

It is a long-held objective of the Council, the NTA's Transportation Strategy for the GDA, and the RSES, to reinstate the rail link to Navan. However, the delivery of the rail link is reliant on a definitive commitment on timeframe and the making of a rail order.

It is noted that Navan has also been designated as a Key Town in the EMRA RSES adopted in 2019. As outlined in the response to the submission from the Eastern Midlands Regional Assembly on the Draft Plan and in accordance with the EMRA RSES Ministerial Direction issued in January 2020 and consequent amendment to Section 5.6 and Table 8.2 of the RSES; MOV POL 5, MOV POL 6 and MOV OBJ 3 of the Draft County Development Plan will be amended to ensure consistency of the EMRA RSES and the NPF. Recognising the critical role of public transport on the economic competitiveness of the county, the quality of life of residents and reduction of transport emissions, this amendment does not dilute the commitment of Meath County Council to further progress the delivery of the Navan Rail link, a policy which will serve to reduce GHG emissions from transportation and contribute to the regions transition to a low carbon economy.

#### **Chief Executive's Recommendation**

Amend p148/149 Movement Strategy as follows: Delete

#### **~~Building on Recovery: Infrastructure and Capital Investment 2016-2021 (Department of Public Expenditure and Reform)~~**

~~The Capital Plan presents the Government's €42 billion framework for infrastructure investment in Ireland over the period 2016 to 2021. The plan is committed to the provision of high quality infrastructure. It outlines allocations for new projects across a number of key areas and funding to ensure that the present stock of national infrastructure is refreshed~~

and maintained. In particular it mentions the commencement of the Slane By-Pass and the Laytown—Bettystown link road.

Replace with: **National Development Plan 2018-2027 (NDP)**

**The National Development Plan 2018 - 2027 (NDP) sets out the investment priorities that will underpin the implementation of the National Planning Framework, through a total investment of approximately €116 billion. This level of capital spending will provide clarity to the construction sector, allowing the industry to provide the capacity and capability required to deliver Government's long-term investment plans. With Enhanced Regional Accessibility a National Strategic Outcome, the Plan outlines the national road network projects which will be provided with investment. This includes the N2/A5 road, serving Meath, Monaghan and Donegal and the N2 Slane Bypass.**

Amend p149 Movement Strategy as follows: Delete

~~**Investing in our Transport Future – A Strategic investment Framework for Land Transport (Department of Transport, Tourism and Sport, 2015)**~~

~~This document considers the role transport should play in the future of the Irish Economy and seeks to identify a strategy for the development and management of Ireland's land transport network. The framework is intended to guide key land transport investment decisions over the next number of decades. The document also provides a set of criteria against which to assess national and regional land use planning policy, including the development of a possible new spatial planning framework. It also functions as a filter for new transport investment projects prior to their appraisal for suitability for inclusion in national or regional schemes.~~

Replace with **Planning Land Use and Transport – Outlook 2040**

**Transport investment must have due regard for the *Project Ireland 2040* National Strategic Outcomes, particularly those which are most relevant to the transport sector, such as enhanced regional accessibility and sustainable mobility. To ensure a consistency of approach across Government in relation to *Project Ireland 2040*, *Planning Land Use and Transport: Outlook 2040* sets out a framework for future transport investment. This document will replace *Transport Future – A Strategic Investment Framework for Land Transport (SIFLT)* and will ensure a joined-up approach to planning across Government.**

Amend p160 Paragraph 6 as follows:

There has been an increased frequency of local bus services largely as a result of the establishment of **Louth Meath Fingal Local Link**. Flexibus, Meath Accessible Transport Ltd. Flexibus **Louth Meath Fingal Local Link** run a daily route between Trim and Navan to assist passengers who wish to access education, training or employment. Regular weekly services run between a number of towns and villages while Dial-A-Ride services are available from a number

of centres. The improvement in public transport between larger towns and between villages and towns is of paramount importance to reduce

Amend Footnote 13. ~~Flexibus~~ **Louth Meath Fingal Local Link** is one of the projects around the country, which are funded by the Department of Transport under the Rural Transport Initiative. Flexibus carried over 114,144 passengers in 2016 (figures obtained from **Louth Meath Fingal Local Link Flexibus**).

<b>Submission No.(s):</b>	MH-C5-72
<b>Submission by:</b>	EPA
<b>Submission Theme(s):</b>	Strategic Environmental Assessment
<b>Summary of Submission:</b>	
<p>The EPA submission contained the following comments and pertains primarily to the Environmental Report. The key points of the submission are as follows:</p> <ul style="list-style-type: none"> <li>• There is merit to include some summary maps and tables in the NTS to highlight the key findings of the SEA.</li> <li>• The Monitoring Programme should be flexible to take account of specific environmental issues and unforeseen adverse impacts should they arise. It should consider and deal with the possibility of cumulative effects. Monitoring of both positive and negative effects should be considered.</li> <li>• Assessment of Alternatives - You should describe the alternatives considered and how the selection and assessment of these has led to the selection of the preferred alternative.</li> <li>• You should assess the alternatives against the 'Strategic Environmental Objectives' identified in the SEA ER.</li> <li>• Assessment of Environmental Effects - You should assess and document the full range of likely significant environmental effects of implementing the Plan, including the potential for cumulative effects in combination with other relevant Plans/ Programmes and Projects.</li> <li>• Mitigation Measures - Where you have identified the potential for likely significant effects, you should provide appropriate mitigation measures to avoid or minimise these. You should ensure that the Plan includes clear commitments to implement the mitigation measures.</li> <li>• If the monitoring identifies adverse impacts during the implementation of the Plan, Meath County Council should ensure that suitable and effective remedial action is taken.</li> <li>• In finalising the Plan and integrating the findings of the SEA into the Plan, the recommendations, key issues and challenges described in our most recent State of the Environment Report Ireland's Environment – An Assessment 2016 (EPA, 2016) should be considered, as relevant and appropriate. Future Amendments to the Plan. You should</li> </ul>	

screen any future amendments to the Plan for likely significant effects, using the same method of assessment applied in the “environmental assessment” of the Plan.

Once the Plan is adopted, you should prepare an SEA Statement that summarises:

- How environmental considerations have been integrated into the Plan;
- How the Environmental Report, submissions, observations and consultations have been taken into account during the preparation of the Plan;
- The reasons for choosing the Plan adopted in the light of other reasonable alternatives dealt with; and,
- The measures decided upon to monitor the significant environmental effects of implementation of the Plan.
- You should send a copy of the SEA Statement with the above information to any environmental authority consulted during the SEA process. Under the SEA Regulations, you should also consult with:
  - The Minister for Housing, Planning and Local Government,
  - The Minister for Agriculture, Food and the Marine, and the Minister for Communications, Climate Action and Environment, where it appears to you as the competent authority that the plan or programme, or modification to a plan or programme, might have significant effects on fisheries or the marine environment,
  - The Minister for Culture, Heritage and the Gaeltacht where it appears to you as the competent authority that the plan or programme, or modification to a plan or programme, might have significant effects in relation to the architectural or archaeological heritage or to nature conservation, and
  - any adjoining planning authority whose area is contiguous to the area of a planning authority which prepared a draft plan, proposed variation or local area plan.

#### **Chief Executive’s Response**

The comments from the EPA are acknowledged and appreciated. Summary maps and tables will be included in the NTS. Comments will also be taken on board in relation to the monitoring programme, assessment of alternatives, assessment of environmental effects, mitigation measures and State of the Environment Report. SEA Statement will be prepared and forwarded to environmental authorities consulted during the SEA Scoping process.

#### **Chief Executive’s Recommendation**

Review of ER recommended, with update, where required.

<b>Submission No.:</b>	MH-C5-823
<b>Submitted by:</b>	National Transport Authority
<b>Submission Theme(s):</b>	Chapter 5 Movement Strategy
<b>Summary of Submission:</b>	
<p>This submission from the National Transport Authority set out the key principles that inform the integration of land use planning and transport planning which are detailed in Chapter 7 of the Transport Strategy and also reflected in the Eastern Midlands RSES.</p> <ol style="list-style-type: none"> <li>1. The NTA has concerns about certain designations for strategic employment lands associated within various settlements, and the basis for the identification of such sites for these uses has not clearly been demonstrated. The NTA recommends that lands zoned for strategic employment should be accessible by sustainable transport modes, particularly where they will accommodate higher density uses. Peripheral sites not well served by public transport are not deemed optimal locations and do not accord with the Tiered approach to development. It is therefore recommended that the identification of lands for strategic employment should be informed by the preparation of Local Transport Plans.</li> <li>2. NTA query the zoning of lands in Maynooth Environs as strategic employment given that they are remote from the town. Similarly, in light of the need to protect the strategic function of national roads, the lands on the western edge of South Drogheda Environs are on the periphery of the town and close proximity to the M1.</li> <li>3. It is requested the preparation of a Local Transport Plan for South Drogheda is included in the Written Statement and requests the reference is made to the preparation of a Local Transport Plan rather than a Transport Study for these combined areas.</li> <li>4. The NTA recommend the inclusion of an objective requiring a Local Transport plan to be prepared for all settlements for which a LAP will be undertaken. Reference to the guidance note prepared by the NTA and TII 'Area Based Transport Assessment (2019)' should be made in the Draft Plan.</li> <li>5. While it is stated that all proposed LAPs will be prepared during the life of this Plan, no timeline is stated for the preparation of LTPs. These should be prepared in tandem with LAPS and not subsequently. It is further recommended that the development of larger sites should be contingent on the completion of the LAP/LTP process.</li> <li>6. The NTA highlight Section 4.2.2 of the Transport Strategy which identifies that there is currently insufficient travel demand between Navan, Dunshaughlin and the City Centre to justify the development of a high capacity rail link at this time. Enhanced bus services are instead proposed to serve this corridor. The rail connection will then be re-assessed as part of the next Strategy review (2021) and should be protected from development intrusion in the meantime.</li> </ol>	

7. NTA recommend that residential parking standards should be expressed as maximum values, not to be exceeded, and to which degrees of constraint can be applied. Restrictive measures would apply to areas with good access to services, education and employment, such as town centres.
  
8. While the Draft Plan includes standards for Cycle Parking, the NTA recommend the Council should consider Standards for Cycle Parking and associated Cycling Facilities for New Developments on design and layout of cycle parking to inform additional development management objectives related to such facilities.
  
9. The revision of MOV POL 13 requires consultation with the Park & Ride Development Office in the consideration of park and ride facilities and that same should only be considered in the context of Local Transport Plan preparation.
  
10. A specific objective is recommended requiring that Accessibility Audits should be carried out for new developments and transport infrastructure, including bus stops and taxi ranks, to ensure that they provide adequately for users.
  
11. The Guidance Notes in Section 11.11.1 state that 'Accessible parking spaces shall generally be provided at a rate of 5%'. It is recommended that this should be revised to require the provision of a minimum of 5% of car parking spaces as accessible spaces.

#### **Chief Executive's Response**

1. Meath County Council take full cognisance of the tiered approach to development and seeks always to achieve a balance between identifying serviced or serviceable sites while ensuring that the employment needs of the county can be realised. Insofar as practicable, Meath County Council has utilised the existing rail infrastructure by placing significant employment sites at Pace & Dunboyne, Drogheda, Laytown, Maynooth and Enfield. While it would be preferable to focus all Strategic Employment Sites (SES) at rail stations and key bus routes, given the public transport deficits within the County and noting that the county town does not benefit from Rail or Dublin Bus, Meath County Council seeks to maximise the use of public transport resources available.

The Council is committed to improving public transport opportunities in Meath and as reflected in MOV OBJ 1, in conjunction with the NTA and relevant stakeholders, is committed to the preparation of a Local Transport Plans for a range of settlements in Meath. In accordance with Development Management procedures, Traffic and Transport Assessments will be required as part of the operation of Development Management procedures, as appropriate. Planning applications for major developments with significant potential to generate traffic and or which could have a significant impact on a major road, particularly national roads will be considered with reference to the outcome of such assessments.

2. The lands referred to, which have been zoned as strategic employment in both Drogheda and Maynooth are a continuation of zonings from previous Local Area Plans for Maynooth and Southern Drogheda Environs. In both cases, these settlements will have

Joint Urban Area Plans completed in conjunction with the respective authorities of Kildare and Louth. Drogheda is identified as a Key Regional Town in RSES and identified to accommodate significant growth in terms of the population and economy during the plan period. A new train station proposal for to the south of Drogheda that will serve majority of lands being zoned.

Maynooth has been identified as a Key Town within the Metropolitan Area as set out in the EMRA RSES, with greater availability of public transport. The future growth and development of Maynooth will be guided by Metropolitan Area Strategic Plan, as outlined in the EMRA RSES. The lands in County Meath form part of the overall development of Maynooth as a town and are specifically important as their development will enable the delivery of a large part of the Maynooth Outer Orbital Route which is essential for the optimal functioning of the town. Maynooth also has a rail station which is available for all existing and proposed residents of the town, including future residents of the Maynooth Environs in County Meath.

3. In accordance with MOV OBJ 1 and to provide clarity, an objective supporting the preparation of a Local Transport Plan for the Southern Environs of Drogheda will be included in the Written Statement and will be carried out in tandem with the Joint Urban Area Plan.
4. The Draft Development Plan is explicit in its support of a local transport plan for Drogheda which is reflected in MOV OBJ 1 - To prepare and commence implementation of, Local Transport Plans (LTP), in conjunction with the NTA and relevant stakeholders, **for** Drogheda (in conjunction with Louth County Council as part of the Joint Urban Plan), Ashbourne, Navan, Ratoath, other settlements where appropriate. This objective will be amended to reference the Area Based Transport Assessment Guidance Notes (2019)
5. The Chief Executive supports the preparation of Local Transport Plans in tandem with Local Area Plans. However, this is subject to the availability of resources within the Local Authority and specifically the Transportation Department. Local Transport Plans are not subject to the statutory timeframes associated with Local Area Plans and therefore, the delivery of Transport Plans in tandem with LAPs cannot be guaranteed in all cases. Notwithstanding this, Meath County Council will endeavour to deliver Transport Plans prior to/or in tandem with LAPs in order to inform the plan-making process at the earliest possible stage.
6. The delivery of Phase II of the Dublin-Navan Rail line will be a critical component of County Meath's transition to a more sustainable county. With population growth continuing in line with the Settlement and Core Strategy, the County suffers from a considerable deficit in the provision of public transport which has led to unsustainable levels of commuting by way of private cars. Acknowledging the unsustainability of these commuting patterns, Meath County Council is fully committed to the delivery of the rail line which will result in a significant positive economic stimulus, carbon emission reductions and social capital/lifestyle benefits for the citizens of the county. When delivered, the Dublin-Navan Rail line will be an electrified rail line (through the DART + programme) which will transform the County and provide sustainable links to the Greater Dublin Area.



The provision of a rail line from the M3 Parkway to Navan will facilitate the development of Navan as a Key Town and it is therefore, imperative that the delivery of the rail line is included in the next NTA Strategy and subsequent Capital Programme if public transport improvement and the consequent carbon emission reduction targets are to be achieved.

7. It is agreed that residential parking standards should have regard to access to services, education, employment and public transport provision and where appropriate, parking constraints should be applied. It should be noted that footnote 18 in Table 11.4 refers to Design Standards for New Apartments in relation to reduced car parking requirements for development adjacent to existing and future rail stations and minimum requirements in peripheral/ or less accessible urban locations.

With regard to car parking standards associated with dwellings, an additional guidance note will be incorporated to provide for a relaxation in car parking spaces in areas with good access to services and strong public transport links.

8. Meath County Council will endeavour to establish a guidance document on the design and layout of cycle parking for the County. An objective to reflect this will be included in Chapter 11 Development Management Standards of the Draft Plan. In the absence of the publication of these guidelines, the Design Standards for new Apartments provide guidance for Bicycle Parking and Storage and DM OBJ 168 will be amended to refer to these Guidelines.

It is noted that further clarification should be provided in relation to cycle parking standards. In this regard, it is noted that DM OBJ 170 is at odds with Table 11.6 which correctly identifies Cycle Parking Standards for the County with respect to the numbers of spaces per type of development. It is concluded that the standards outlined in Table 11.6 supersede that of DM OBJ 170 and it is therefore recommended to remove DM OBJ 170 from the Draft Plan.

9. It is agreed to amend MOV POL 13 to incorporate the consultation with the Park & Ride Development Office.
10. It is noted that MOV OBJ 13 aims to improve the accessibility of wheelchair users with regard to existing public infrastructure but does not include such improved accessibility in future transport infrastructure development. In this regard, MOV OBJ 13 will be amended to ensure future proposals for infrastructural development are subject to Accessibility Audits.
11. It is agreed to amend Section 11.11.1 to reflect the rate of accessible parking spaces as a minimum of 5% of the total number of spaces.

#### **Chief Executive's Recommendation**

1. No Change Recommended
2. No Change Recommended.
3. Include the following objective in the Drogheda Written Statement:

**STH DRO OBJ 3: To support the preparation of a Local Transport Plan for Drogheda, in conjunction with Louth County Council and in consultation with the National Transport Authority and other relevant stakeholders.**

4. Amend Chapter 5, p154 as follows: MOV OBJ 1 – ‘To prepare and commence implementation of, Local Transport Plans (LTP), in conjunction with the NTA and relevant stakeholders, **for Drogheda (in conjunction with Louth County Council as part of the Joint Urban Plan), Ashbourne, Navan, Ratoath, other settlements where Appropriate, having regard to the Area Based Transport Assessment Guidance Notes (2019).**
5. No Change Recommended
6. No Change Recommended
7. Amend Chapter 11, Table 11.4 Guidance Notes to include the following text:  
**Residential Car Parking provision can be reduced at the discretion of the Council, where such development is proposed in areas with good access to services and strong public transport links.**
8. Amend the following Objective  
DM OBJ 170: ~~Secure cycle parking facilities shall be provided in new office, residential apartment development, retail and employment generating developments. Such facilities shall be within 25 metres for short term parking, (shops) and 50 metres for long term parking (school, college, and office). The number of stands required will be a third of the number of car spaces required for the development, subject to a minimum of one stand.~~  
To establish and implement Cycle Parking Standards for new developments in the County.  
Amend Chapter 11, Section 11.11.3 as follows:  
DM OBJ 168: To require the provision of cycle parking facilities in accordance with **the Design Standards for New Apartments (March 2018) and Table 11.6 Cycle Parking Standards.**
9. Amend Chapter 5, p152 as follows: MOV POL 13 - To promote and support the provision of Park-and-Ride facilities **in the preparation of Local Transport Plans, in consultation with the Park & Ride Development Office**, which improve public transport accessibility without exacerbating road congestion, or which cause increased car travel distances, at appropriate locations within the County.
10. Amend Chapter 5, MOV OBJ 13 as follows:  
To work with the NTA and Bus Eireann to make all existing public transport services throughout the county more accessible for wheelchair users and those with disabilities- **and require that proposals for new transport infrastructure are subject to an Accessibility Audit.**
11. Amend Chapter 11, Section 11.11.1, Guidance notes as follows: *Accessible car parking spaces shall ~~generally~~ be provided at a **minimum** rate of 5% of the total number of spaces, for developments requiring more than 10 car parking spaces, with the minimum provision being one space (unless the nature of the development requires otherwise). Such spaces shall be proximate to the entry points of buildings and comply with the requirements of the Building Regulations.*

<b>Submission No.:</b>	MH-C5-112
<b>Submitted by:</b>	Transport Infrastructure Ireland
<b>Submission Theme(s):</b>	Chapter 5 Movement Strategy
<b>Summary of Submission:</b>	
<p>TII welcome the inclusion of strategic objectives to maintain the strategic capacity and safety of the national roads network and to ensure the existing extensive transport networks are maintained to a high level to ensure quality levels of service, accessibility and connectivity to transport users. The following observations and recommendations are made with respect the Draft Plan.</p> <ol style="list-style-type: none"> <li>1. Recommends amending MOV POL 24 as follows: To safeguard the capacity and safety of the National road network by applying the provisions of the Department of Environment Community and Local Governments – Spatial Planning and National Roads-Guidelines for Planning Authorities 2012. <b>Development access to national roads and intensification of existing access to national roads to which speed limits greater than 60kph apply will not be permitted, save in accordance with agreed ‘exceptional circumstances’ included in MOV POL 33.</b></li> </ol> <p>TII express satisfaction with the agreed ‘exceptional circumstances’.</p> <ol style="list-style-type: none"> <li>2. It is critical that when reviewing lands at strategic locations for employment generating uses adjoining motorway junctions as part of a local area plan, that the principle of protecting the strategic function of national roads and motorways and limiting developments in areas not otherwise served by public transport, is adhered to, thereby demonstrating compliance with Government policy, the NTA Strategy and the EMRA RSES. It is requested that an evidence-based approach to implementation of MOV POL 34 should be developed and should be developed within the context of local area plans preparation, rather than assessed at development management stage.</li> </ol> <p>This also applies to Section 4.7 of the Draft Plan as it is submitted that there are a number of strategic employment sites included in the Draft Plan with potential implications on the national road network.</p> <ol style="list-style-type: none"> <li>3. Recommendation to amend RUR POL 58 as follows: To ensure that future development affecting national primary or secondary roads, shall be assessed in accordance with the guidance given in the document ‘Spatial Planning and National Roads – Guidelines for Planning Authorities’ (or any replacement document). <b>Development access to national roads and intensification of existing access to national roads to which speed limits greater than 60kph apply will not be permitted, save in accordance with agreed ‘exceptional circumstances’ included in MOV POL 33.</b></li> </ol>	

4. Recommends updating RUR POL 64 to reflect that the DMRB has been superseded by subsequent TII publications.
5. Details of relevant roads schemes and improvements which should be incorporated into the Draft Plan include the N2 Slane Bypass, N2 Rath Roundabout to Kilmoon Cross, N3 Clonee to M50. The N3 Virginia Bypass should also be referenced in the Plan. TII also suggest that The Leinster Outer Orbital Route should be given long term protection.
6. Section 5.8.1 addresses the Slane Bypass. TII recommends that the Council carefully considers the text of objective MOV OBJ 33 to ensure consistency with the text of the EU Habitats Directive and in the interests of avoiding unintended consequences. A similar exercise should be undertaken in relation to SLN OBJ 7 in the Slane Written Statement.
7. Section 5.8.2 refers to the Leinster Outer Orbital Route, now known as the Leinster Orbital Route. To reflect the status of this project, it is recommended the following policies are amended.

MOV POL 23 – To support the ~~reservation of the indicative route~~ **delivery** of the Leinster ~~Outer~~ Orbital Route, which is considered to comprise important infrastructural development, **and to protect any route corridor and/or corridor options**, free of developments which could interfere with the provision of the project (ONCE FINALISED).

MOV POL 34 - To reserve **any route corridor and/or corridor options** ~~the indicative route~~ of the Leinster Outer Orbital Route free of developments which could interfere with the provision of the project (ONCE FINALISED).

MOV OBJ 35 - To continue to support and facilitate TII, Fingal County Council, Louth County Council and Monaghan County Council in the planning and delivery of upgrades to the N2, as appropriate and to reserve route corridor **and/or corridor options free from development which would interfere with the delivery of identified schemes.**

8. TII note proposals including the addition of new junctions and the improvement and upgrading of existing national road junctions on the national motorway network. TII is not aware of the basis for or any case supporting such improvements where such proposals are not catered for in Development Plan objectives. TII notes proposals regarding Bus (Section 5.7.2) and Park and Ride Facilities (Section 5.7.3) may have implications for the national road network and recommend early consultation in relation to such scheme to ensure they are consistent with official policy.
9. TII recommends that a review of the following policies and objectives in relation to the Habitats Directive MOV OBJ 36, MOV OBJ 43, HER POL 32 and HER OBJ 32 be carried out to ensure consistency with the Habitats Directive.
10. Retail - TII would welcome a new policy objective to include the explicit presumption against large out of town retail centres located adjacent to or close to existing, new or planned national roads/motorways reflecting policy guidance outlined in the Retail Planning Guidelines. 2012

11. It is recommended that Traffic and Transport Assessments be carried out on planning applications for significant development proposals together with their cumulative impacts. Aside from MOV OBJ 11, an additional objective would be supported. Reference to Area Based Transport Assessment Guidance notes are advised.
12. Objective MOV POL 28 outlines the requirement for the Road Safety Audits. It is requested that reference to Road Safety Impact Assessment is included in the final Plan.
13. Signage – Requests reference be made to Section 3.8 of Spatial Planning and National Roads Guidelines and The Provision of Tourism and Leisure Signage on National Roads (2011) which outlines specific policy on the provision of signage on national roads in DM OBJ 178.
14. TII is of the opinion that placing advertising signage on roundabouts to national junctions is not in adherence with national policy and requests MOV OBJ 51 is amended.
15. Noise – Noting that Section 6.20 deals with Noise, TII requests that the final Plan include a section and objective on noise sensitive uses in proximity to existing and future National Routes. This matter is addressed in Section 3.7 of the Spatial Planning and National Roads Guidance.
16. Service Areas – TII would welcome reference to Section 2.8 of the Spatial and National Roads Guidelines regarding off-line motorway service areas at national road junctions in the final Plan. MOV POL 31 includes reference to the TII policy statement ‘Service Areas on Motorways and High-Quality Dual Carriageways’. This should instead be referred to as TII Policy on Service Areas (August, 2014)
17. TII recommends amending MOV OBJ 59 to clarify whether the Council is referring to off-line service area proposals. The review of Section 11.8.1.4 is also required to ensure consistency with the above objective.
18. Recommendation to include a new objective associated with Section 5.9.1 National Roads relating to the safeguarding and protection of national road drainage regimes which should function with the sole purpose of disposing of national road surface water. Eg. Objective **‘The capacity and efficiency of the national road network drainage regimes in County Meath will be safeguarded for national road drainage purposes’.**

#### *Renewable Energy*

19. Recommendation to include an objective in relation to Solar Energy (Section 6.15.3.1) requiring the submission of Glint and Glare Assessments with relevant applications where there may be implications for the safety and efficiency of the strategic national road network.
20. It is requested that renewable energy developments assess all grid connection alternatives and only use the national road grid connection route when other alternatives have discounted. An objective in respect to the assessment of grid connection options would be welcomed.

21. Request that consultation with TII is carried out during the preparation of Local Area Plans and Local Transport Plans to ensure the safe and efficient operation of the road network.

*Ashbourne Written Statement*

22. TII would welcome consultation on the preparation of the Ashbourne Local Area Plan and Local Transport Plan within the lifetime of the Development Plan, having regard to interactions with the M2.
23. Having regard to the EMRA RSES and the NTA Strategy, with the exception of limited circumstances, trip intensive developments of significant levels of development should not occur in locations not served by existing or committed high capacity public transport.
24. TII have had no consultation in relation to Master Plan 2 lands. It is also noted that ASH OBJ 21 requires the preparation of a Masterplan for lands identified in OBJ MP3. However, no consultation or adoption framework is outlined.
25. The Sustainable Residential Development in Urban Areas Guidelines advise that non statutory documents for development management should be incorporated into the Development Plan and where possible, public consultation be integrated into the preparation of non-statutory frameworks. This is not evident in the Draft Plan. TII request clarification and recommend reference to the Local Area Plan Guidelines.
26. The additional 'General Enterprise and Employment' lands to the north of the town are noted. No assessment or evidence base has been provided to support the additional zoning designation in proximity to the M2. Such designations are not consistent with measures to provide future upgrades or consistent with the Spatial Planning and National Roads Guidelines. A review of zoning is recommended to ensure consistency with national policy and the safeguarding of the strategic national road network.
27. OBJ ASH 6 recommends the identification of a suitable location for the bus-based park and ride. TII recommend the advancement of this in the Transport Plan.
28. TII recommend the exceptional circumstances provisions relating to Ashbourne are included in the Written Statement and Land Use Zoning Map.

*Athboy Written Statement*

29. Request consultation on the future Local Area Plan for Athboy having regard to interactions with the N51.

*Carlanstown Written Statement*

30. Requests that the N52 Carlanstown Bypass should be progressed in consultation with TII given its potential to impact the national road network

It is also recommended an access strategy is developed for the General Employment lands north east of the town adjoining the N52 that ensures consistency with official policy and in the interests of road safety.

*Dunboyne and Clonee Written Statement*

31. TII would welcome consultation on the preparation of the Dunboyne and Clonee Local Area Plan and Local Transport Plan within the lifetime of the Development Plan, having regard to interactions with the M3 and recommends the plan be fully informed by the Transportation Study for Dunboyne and Environs.
32. It is requested that the Dunboyne Clonee Pace Land Use zoning map indicates the transport interventions required to support the development of Dunboyne Environs. It is also requested the Written Statement include the future design principles included in Section 7.2 of the Study.
33. TII refer to Master Plan 2 lands and identifies no mechanisms for stakeholder consultation in respect of this.

*Dunshaughlin Written Statement*

34. TII would welcome consultation in relation to future local area planning for Dunshaughlin having regard to interactions with the M3, motorway network. The additional 'General Enterprise and Employment' lands to the west of the town is noted. No assessment or evidence base has been provided to support the additional zoning designation in proximity to the M3. A review of zoning is recommended to ensure consistency with national policy and the safeguarding of the strategic national road network.

*Enfield Written Statement*

35. TII would welcome consultation on the preparation of the Enfield Local Area Plan.

*Kells Written Statement*

36. TII would welcome consultation on the preparation of the Kells Local Area Plan and request future consultation in particular on KEL OBJ 4 which provides for the preparation of Masterplans for four sites, in particular Masterplan 3, in proximity in to the N52.
37. KEL OBJ 15 includes an objective to facilitate the implementation of pedestrian enhancements to the N52, the introduction of vulnerable road users to high speed highly trafficked sections of national road will require careful consideration and any such enhancements must be prepared complementary to the safeguarding of the strategic function of the national road.

*Maynooth Written Statement*

38. TII would welcome consultation on the preparation of the Maynooth Local Area Plan.

*Navan Written Statement*

39. TII would welcome consultation on the preparation of the Navan Local Area Plan, having regard to interactions with the M3 and N51. It is requested such documentation take full cognisance of the EMRA RSES Guiding Principles.
40. TII submit that Masterplan 10 be subject to an appropriate transport assessment. It is recommended that the agreed 'exceptional circumstances' provisions as they relate to Navan be included in the Written Statement.

*Slane Written Statement*

41. It is recommended that the agreed 'exceptional circumstances' provisions as they relate to Slane be included in the Written Statement.
42. It is recommended that SLN OBJ 7 to ensure consistency with the EU Habitats Directive be carefully considered.

*South Environs of Drogheda Written Statement*

43. In accordance with MOV OBJ 1, the commitment to a Local Transport Plan is not apparent in the South Drogheda Environs Written Statement.
44. TII recommends consultation on the quantum of zoning designations and lands adjoining the M1 and associated junctions.

*Stamullen Written Statement*

45. TII recommends consultation on the quantum of zoning designations and lands adjoining the M1 and associated junctions.
46. Section 4.4 refers to upgrading of M1 Junction 7 to facilitate vehicular access to/from Stamullen via City North Business Campus to the M1 interchange. STA OBJ 5 and STA OBJ 9 and ED OBJ 65 also refer to this. The Authority has stated concerns in previous submissions to Meath County Council with regard to increased connectivity to Stamullen Village via City North Business Campus as same is dependent on private car use and access to the national road network. TII set out their previous position in PL. 17.237144, relating to the construction of the North South Distributer Road linking Gormanstown Road with the M1 Interchange. As it is the belief that said issues remain unresolved, consequentially it remains the position of TII and the omission of this objective is recommended.

**Chief Executive's Response**

1. The Chief Executive has considered the comments of TII and agrees to amend the wording of MOV POL 24 to clarify the official policy positions that apply to this policy.
2. The Draft Plan will incorporate an evidence-based core strategy that will accord with the provisions set out in the Planning and Development Acts 2000 (as amended) and the NPF and EMRA RSES, ensuring that development is supported and integrated with a range of facilities in a sustainable manner.
3. The Chief Executive has considered the comment of TII and agrees to amend the wording of RUR POL 58 to clarify the 'exceptional circumstances' that also apply to this policy.
4. The Chief Executive acknowledges the importance of the Design Manual for Urban Roads and Streets (2019) in the role of encouraging more sustainable travel patterns and agrees with the recommendation to strengthen the wording in Chapter 5 Movement Strategy regarding the implementation of DMURS. It is agreed that RUR POL 64 under Section 9.19



on Rural Development will also be amended to reflect the latest TII policy. Furthermore, it is acknowledged that additional policies relating to current technical standards should be incorporated in the final Plan.

5. Table 5.1 of the Draft Plan contains a list of Road Improvement Schemes for the County. This table will be updated to include reference to the N3 Virginia Bypass while the 'M3 'Junction 4 Clonee' will be relabelled as the 'N3 Clonee to M50' to accord with the TII's reference to the project.
6. The Chief Executive agrees with TII that the additional wording is not consistent with the role and function of the statutory requirements of the development management process as set out in the relevant legislation. Any planning application for the Slane Bypass must be rigorously prepared in accordance with the requirements of the European Habitats Directive 92/43/EEC and the EIA Directive 2014/52/EU amending the EIA Directive 2011/92/EU. It is therefore recommended that MOV OBJ 33 and SLN OBJ 7 be amended to clarify same.
7. The Leinster Orbital Route extends from Drogheda to the Naas/Newbridge area with intermediate links to Navan and other towns. Its completion would provide connections between these towns, currently poorly served by direct linkages, supporting their economic development and improvements in orbital public transport connectivity.

The Draft Development Plan is explicit in its support of the Leinster Orbital Route with reference to MOV POL 23 and MOV POL 34. Notwithstanding this, the Chief Executive notes that the Leinster Orbital Route Feasibility Study, completed in 2007, was carried out in the context of the national planning policy of its time, projected traffic patterns and predicted population growth. The indicative corridor identifies the range of alternative routes from of which the final corridor will be selected. The Draft Plan reflects the position in the overarching Transport Strategy and will protect the route from development when the route corridor has been finalised. However, pending a re-visit of the Feasibility Study to reflect its compliance with national and regional planning policy and the finalisation of the proposed route, it would be considered premature to protect this corridor for the Leinster Orbital Route in the absence of the selection of a final corridor for the project. As such, MOV POL 23 and MOV POL 34 must be amended to incorporate the recommendation of TII while reflecting the Councils support of the reservation of the final corridor route.

8. The "Spatial Planning & National Roads Guidelines" set out planning policy considerations relating to the development affecting national primary and secondary roads, including motorways and associated junctions, outside of the 50 – 60 km per hour speed limit zone for built up areas. The Guidelines state that following the considerable investment in the national road network / inter urban motorways, and with future investment being focused on public transport, it is important that the efficiency, capacity and safety of the national road network is maintained.

In accordance with the National Roads and Spatial Guidelines and a plan-led approach, it is important to identify that these road junctions are likely to require upgrading during the lifetime of the Plan. These upgrades have formed part of the current Development Plan and have been carried over based on the ongoing requirement for upgrading.

Schemes identified in Table 5.1 of the Draft Plan will be carried out in consultation with TII, in accordance with the Spatial Planning and National Roads Guidelines and subject to resources and funding for these schemes.

9. In line with the proposed amendments to MOV OBJ 33 and SLN ONJ 7 and having regard to the Strategic Environmental Assessment and Appropriate Assessment for the Draft Plan, it is considered that the requirement for plans and projects to undergo Appropriate Assessment are adequately supported in the Draft Plan by the standalone objectives HER OBJ 32 and HER OBJ 33 in Chapter 8 Cultural and Natural Heritage Strategy, which are consistent with the requirements of the Habitats Directive.

It is therefore agreed that the objectives highlighted by TII, namely MOV OBJ 36, MOV OBJ 43 and HER POL 32 should be amended to ensure consistency with the text of the EU Habitats Directive. Accordingly, it is noted that the text contained in the above referenced objectives are also present in a range of additional policies and objectives in the Draft Plan, namely MOV OBJ 47, MOV OBJ 49, MOV POL 33, INF OBJ 5, INF OBJ 24, INF OBJ 29, ED OB 75 and HER POL 25. To ensure consistency within the Draft Plan and more critically, with the Habitats Directive, it is recommended these policies and objectives are also amended. This will not dilute the critical and binding force of Appropriate Assessment but will support Meath Council in their role of guaranteeing the full application of the Directive in a clear and precise manner.

The wording of HER POL 6, HER POL 27 and HER POL 55 should also be amended to ensure consistency within the Draft Plan.

10. It is considered that explicit presumption against large out of town retail centres located adjacent to or close to existing, new or planned national roads/motorways is adequately covered under a comprehensive suite of objectives ranging from ED POL 27 to ED POL 36 with ED POL 32 and ED POL 33 particularly addressing this issue.
11. The Chief Executive agrees to incorporate an objective to ensure Traffic and Transport Assessment are carried out on planning applications for significant development proposals which are assessed with their cumulative impacts. This can be achieved by amending MOV OBJ 11 to include Traffic and Transport Assessments.
12. It is agreed that Road Safety Impact Assessments should be included in the final Plan by way of an amendment to MOV POL 28 in Chapter 5 of the Draft Plan. Reference to Road Safety Impact Assessments will also be included in Chapter 11 of the Draft Plan on Development Management.

13. Discouragement of signage at roundabout to national junctions is considered to be adequately addressed in Chapter 11 of the Draft Plan for Development Management under Objective DM OBJ 177 which states '*Advertisement structures will not be permitted where they give rise to a potential traffic hazard. In general, advertisement structures will not be permitted at roundabouts, at traffic signalised junctions, at locations where they obstruct sight lines, compete with other traffic signs, give rise to confusion for road users or endanger traffic safety.* Notwithstanding this, DM OBJ 177 can be amended to refer to the Spatial Planning and National Roads Guidelines and The Provision of Tourism and Leisure Signage on National Roads to identify the origin of the objective and further details on signage guidelines.
14. MOV OBJ 51 sets out an objective to improve the visual appearance of roundabouts and is not relevant to the placement of advertising signage. The Councils policy on signage along roundabouts, junctions and national routes is considered to be adequately addressed in Chapter 11 Development Management Standards and Land Use Zoning under Objective DM OBJ 177 and DM OBJ 178.
15. As noted, the issue of noise sensitive uses is dealt with in Section 6.2 of the Draft Plan. An objective in respect of this is already present in the Draft Plan under MOV OBJ 62 which has regard to residential development. However, this can be expanded to encompass other noise sensitive developments.
16. Meath County Council will support and facilitate the provision of Motorway Service Stations identified in the Spatial Planning and National Roads Guidelines for Planning Authorities, DECLG (2012) and TII's Policy on Service Areas (August 2014). MOV POL 31 will be amended to reflect the updated policy in respect of Service Areas.
17. MOV OBJ 59 refers to on-line service area proposals. This should more correctly refer to both on-line and off-line service area and will be amended to reflect this.

DM OBJ 102 with Section 11.8.1.4 of the Draft Plan will also be amended to include an additional bullet point to discuss the provision of HGV facilities at offline and online service stations as part of pre-application discussions.

As requested, Section 11.8.1.4 will refer to guidance set out in the Spatial Planning and National Roads Guidelines for Planning Authorities on on-line service station facilities.

18. The Chief Executive agrees that an objective should be included to protect the national road network drainage systems in the County.
19. The Chief Executive agrees to include an objective on Glint and Glare which will be included in the Chapter 11 on Development Management. It is noted that DM OBJ 149 is a duplication of DM OBJ 147. DM OBJ 149 will be amended to provide for Glint and Glare Assessments for Solar Farms where potential for safety or efficiency issues arise with regard to the national road network.

20. The issue of grid connection route options is a matter for the Development Management process where grid connection route options should be considered at part of the relevant application process. Given that each renewable energy project is likely to require differing extents of road for grid connection purposes, each project should be assessed on its own individual merits as part of the Development Management process.
21. TII is a statutory consultee for the purposes of the Meath County Development Plan and Local Area Plans for Meath. As such, Meath County Council will liaise and consult with TII to ensure the safe and efficient operation of the national road network is maintained.
22. – 46. A range of points have been raised in relation to the Written Statements of Ashbourne, Athboy, Carlanstown, Dunboyne and Clonee, Dunshugahlin, Enfield, Kells, Maynooth, Navan, Slane, the South Environs of Drogheda and Stamullen. The issues raised in respect of these Written statement are re-occurring and relate primarily to public consultation at Local Area Plan stage, evidence-based approach for masterplan lands and General Enterprise and Employment' lands, concerns relating to the proximity of zoned lands to the strategic national road network. It should be noted that in almost all cases, the subject lands referred to have been zoned in the previous CDP and/or relevant Local Area Plans. Other issues raised relate to vehicular access to/from Stamullen via City North Business Campus to the M1 interchange, the location of Park and Ride Sites and the preparation of Local Transport Plans. These are appropriately addressed below:
- Local Area Plan, Transport Plan and Masterplan Consultation  
As noted above, TII is a statutory consultee for the purposes of the Meath County Development Plan and Local Area Plans for Meath. As such, Meath County Council will positively liaise and consult with TII during the preparation of Local Area Plans and their respective Local Transport Plans to ensure the safe and efficient operation of the national road network is maintained.
  - Drogheda Local Transport Plan  
In accordance with MOV OBJ 1 and having regard to the reference to the preparation of a Local Transport Plan in the East Meath Written Statement, Meath County Council will support the inclusion of an objective supporting the preparation of a Local Transport Plan for the Southern Environs of Drogheda in the Written Statement. Same will be considered as part of the drafting of the joint Local Area Plan between Meath and Louth County Councils.
  - Zoning of 'Masterplan' Lands and 'General Enterprise and Employment' in Proximity to Strategic National Road Network  
Meath County Council take full cognisance of the EMRA RSES and seek to achieve a balance between recognising the strategic function of national roads and associated junctions while ensuring the employment needs of the county can be achieved. The public transport deficits faced by County Meath require necessary compromises in the identification of enterprise and employment sites, which must be guided by the transport resources available.

The County Council is committed to improving public transport opportunities in Meath and achieving a greater work live/work community thereby reducing the unsustainable commuting patterns currently faced by residents within the County. In doing so, the zoning of additional employment sites in accessible locations is a key component of the overarching vision. Until a commitment to the extension of a rail service and broader bus service can be achieved, the county must work to increase its employment opportunities thereby providing an alternative to the current commuting patterns reflected throughout settlements in County Meath.

Meath County Council is committed to the preparation of a Local Transport Plan for Drogheda. The Draft Development Plan is explicit in its support of a local transport plan for Drogheda which is reflected in MOV OBJ 1 - To prepare and commence implementation of, Local Transport Plans (LTP), in conjunction with the NTA and relevant stakeholders, **for** Drogheda (in conjunction with Louth County Council as part of the Joint Urban Plan), Ashbourne, Navan, Ratoath, other settlements where Appropriate. This will also be reflected in the South Drogheda Environs Written Statement.

- Access to/from Stamullen via City North Business Campus to the M1 interchange  
The Council will facilitate the protection of all National Routes from frontage access and to minimise the number of junctions in accordance with Transport Infrastructure Ireland's Policy and the Department of Housing, Planning Community and Local Government's 'Spatial Planning and National Roads Guidelines for Planning Authorities' (2012). However, it is the view of the Council that the vehicular access to/from Stamullen via City North Business Campus to the M1 interchange will not adversely affect the M1 Motorway Network and would be a necessary improvement to the circuitous route currently in place for users of this route. Until further support and investment is received from Government, Meath County Council must continue to provide, support and accommodate sustainable development of Stamullen in accordance with NPF/RSES and with particular reference to proximity to the Dublin-Belfast corridor.

- Park & Ride Facilities  
It is agreed that the advancement of ASH OBJ 6 will be carried out as part of the Local Transport Plan for Ashbourne

- Exceptional Circumstances.  
It is not considered necessary to include 'exceptional circumstances' in the written Statement of Ashbourne and Slane as the inclusion of this in the Written Statement would lead to unnecessary duplication.

- Dunboyne Clonee Pace Land Use zoning map  
Though TII's recommendation to indicate the transport interventions required to support the Dunboyne Environs in the Dunboyne-Clonee-Pace Land Use Zoning is noted, it is not considered necessary to incorporate the Transportation Study or transport interventions into the Dunboyne-Clonee-Pace Land Use Zoning Map at this stage. Support for the

delivery of the Transportation Study for Dunboyne and its Environs is adequately reflected in DCEOBJ 22 of the Draft Plan and given the location specific nature of the Study, it is considered more appropriate to incorporate same as an Appendix to the Dunboyne & Clonee Local Area Plan, when completed. Inclusion of the specific infrastructure interventions into the CDP at this stage of the process could create significant problems for plan delivery from an SEA and particularly AA perspective.

### Chief Executive’s Recommendation

1. Amend Section 5.9.2 of Chapter 5, Volume 1, as follows:  
 MOV POL 24: To safeguard the capacity and safety of the National road network by applying the provisions of the Department of Environment Community and Local Governments – Spatial Planning and National Roads-Guidelines for Planning Authorities 2012. **To avoid the creation of any additional development access to national roads and intensification of existing access to national roads to which speed limits greater than 60kph apply, save in accordance with agreed ‘exceptional circumstances’ included in MOV POL 33.**
2. No Change required
3. Amend Section 9.16 of Chapter 9, Volume 1 as follows:  
 RUR POL 58: To ensure that future development affecting national primary or secondary roads, shall be assessed in accordance with the guidance given in the document ‘Spatial Planning and National Roads – Guidelines for Planning Authorities’ (or any replacement document). **To avoid the creation of any additional development access to national roads and intensification of existing access to national roads to which speed limits greater than 60kph apply, save in accordance with agreed ‘exceptional circumstances’ included in MOV POL 33.**
4. **Amend Section 9.19 in Chapter 9 Volume 1 as follows:**  
**RUR POL 64:** To ensure that the required standards for sight distances and stopping sight distances are in compliance with current road geometry standards as outlined in the **TII’s Design manual for urban Roads and Streets and Design DN-GEO-03031 Rural road link design** ~~NRA document Design Manual for Roads and Bridges (DMRB) specifically Section TD 41-42/09~~ when assessing individual planning applications for individual houses in the countryside.
5. Table 5.1 of the Draft Plan as follows:

Scheme Name	Description of Works
Slane By-pass (N2)	To deliver key strategic infrastructure including Slane Bypass incorporating new bridge over the River Boyne.

<p><b>Enhancements of the N2/M2 national route inclusive of a bypass of Slane, to provide for additional capacity on the non-motorway sections of this route, and to address safety issues in Slane village associated with, in particular, heavy goods vehicles.</b></p>	<p>To continue to support and facilitate TII, Fingal County Council, Louth County Council and Monaghan County Council in the planning and delivery of upgrades of the N2 as appropriate.</p>
<p><b>N2 Rath Roundabout to Kilmoon Cross</b></p>	<p>Improvements of road and junctions to address current capacity constraints.</p>
<p>N3 Virginia Bypass</p> <p><b>M1 Junction 9 Drogheda (M1 South Junction)</b></p>	<p><b>Strategic radial corridor linking Dublin with Cavan and onward to Enniskillen</b></p> <p>M1 Motorway</p> <p>Possible upgrading of this junction to improve capacity.</p>
<p><b>M1 Junction 8 Duleek</b></p>	<p>Possible upgrading of this junction to improve capacity</p>
<p><b>M1 Junction 7 Julianstown/Stamullen</b></p>	<p>Upgrading of this junction to improve capacity inclusive of the facilitation of vehicular access to / from Stamullen via the City North Business Campus to the M1 Interchange.</p> <p>M3 Motorway</p>

<b>M3 Junction 4 Clonee</b> N3 Clonee to M50	Possible upgrading of this junction to improve capacity.
<b>M3 South of Junction 4</b>	Introduce an additional lane on both M3 carriageways in order to manage capacity on the network, in co-operation with planned M3 upgrades with Fingal County Council and TII.
<b>M3 Junction 5</b> Dunboyne	Possible upgrading of this junction to improve capacity.
<b>M3 Junction 8 Navan</b> South	Possible upgrading of this junction to improve capacity.
<b>M3 Junction 9 Navan</b> North	Possible upgrading of this junction to improve capacity.
<b>N52 Grange – Clontail</b> (formally known as Fringestown Scheme)	Re-alignment of the existing N52 and R162/N52 junction from a point west of the R162 junction eastwards to Clontail.
<b>N51 Dunmoe Phase II</b>	Realignment of N51 between Blackcastle Demense and Cruicetown. Final phase of N51 Navan – Slane.
<b>N51 Halltown</b>	Construction of junction improvement and re-alignment of minor roads.
<b>R132 Julianstown</b> Bypass	Examine feasibility and thereafter if appropriate progress the design and delivery of a preferred option.
<b>R147 Blackbull</b> roundabout	To replace the Blackbull roundabout with a signalised junction and the provision of a signalised controlled access on the R147.



<b>N51 Slane to Louth County boundary</b>	Re-alignment including widening of Mattock Bridge, and junction improvements.
<b>R150 Bettystown – Laytown Spine Road</b>	To continue to support the delivery of the North –South Spine Road linking Bettystown – Laytown.
<b>N52/R154 Junction</b>	Improve junction and re-align regional road to introduce a staggered arrangement.
<b>N52 Balrath Junction</b>	Re-align N52 and improve junction layout.
<b>N3-N4 Link road</b>	Provision of Ongar to Barnhill link road
<b>R162 Navan Kingscourt Road and R157 Dunboyne Maynooth Road</b>	Safety Upgrades
<b>Strategic Local Bypasses / Relief Roads (Map 5.2 refers)</b>	Examine feasibility and progress where appropriate local bypass and relief roads within the County.

6. Amend Chapter 5, Volume 1 and Slane Written Statement as follows:  
 MOV OBJ 33/ SLN OBJ 7: To support and facilitate the delivery of the bypassing of Slane, which is considered to comprise essential infrastructural development and to construct same subject to obtaining the relevant development consents required and to reserve and protect route option corridors from development which would interfere with the provision of the project. Development of the project will be subject to the outcome of the Appropriate Assessment process. ~~Where adverse effects on European site integrity are identified, alternative routes or designs will be developed to ensure that the project will not adversely affect the integrity of any European Site(s), the project will not be progressed unless and alternative solution can be implemented which avoids/reduces the impact to a level that the integrity of the European Site(s) is (are) unaffected.~~

7. Amend Section 5.8, Chapter 5, Volume 1 of the Draft Plan as follows:

MOV POL 23 – To support the ~~reservation of the indicative route~~ **delivery** of the Leinster ~~Outer~~-Orbital Route, which is considered to comprise important infrastructural development, **and when finalised, to protect the route corridor** free of developments which could interfere with the provision of the project.

MOV POL 34 – **When finalised and agreed**, to reserve **the route corridor** ~~the indicative route~~ of the Leinster Outer Orbital Route free of developments which could **otherwise** interfere with the provision of the project.

MOV OBJ 35 - To continue to support and facilitate TII, Fingal County Council, Louth County Council and Monaghan County Council in the planning and delivery of upgrades to the N2, as appropriate and to reserve route corridor **free from development which would interfere with the delivery of identified schemes, when finalised.**

8. The “Spatial Planning & National Roads Guidelines” set out planning policy considerations relating to the development affecting national primary and secondary roads, including motorways and associated junctions, outside of the 50 – 60 km per hour speed limit zone for built up areas. The Guidelines state that following the considerable investment in the national road network / inter urban motorways, and with future investment being focused on public transport, it is important that the efficiency, capacity and safety of the national road network is maintained.

In accordance with the National Roads and Spatial Guidelines and a plan-led approach, it is important to identify that these road junctions are likely to require upgrading during the lifetime of the Plan. These upgrades have formed part of the current Development Plan and have been carried over based on the ongoing requirement for upgrading.

Schemes identified in Table 5.1 of the Draft Plan shall be carried out in consultation with TII, in accordance with the Spatial Planning and National Roads Guidelines and subject to funding for these schemes.

9. Amend MOV OBJ 36, MOV OBJ 43, MOV OBJ 47, MOV OBJ 49, MOV POL 33, INF OBJ 5, INF OBJ 24, INF OBJ 29, HER POL 25 and ED OB 75 to remove the following text in the above objectives: **Development of the project will be subject to the outcome of the Appropriate Assessment process.** ~~Where adverse effects on European site integrity are identified, alternative routes or designs will be developed to ensure that the project will not adversely affect the integrity of any European Site(s), the project will not be progressed unless and alternative solution can be implemented which avoids/reduces the impact to a level that the integrity of the European Site(s) is (are) unaffected.~~

Amend HER POL 32 as follows:

HER POL 32: To permit development on or adjacent to designated Special Areas of Conservation, Special Protection Areas, or those proposed to be designated

over the period of the Plan, only where **the development has been subject to the outcome of the Appropriate Assessment process** and an appropriate level of assessment has been carried out to the satisfaction of the Planning Authority, in consultation with National Parks and Wildlife, ~~can clearly demonstrate that it will have no adverse effect on the integrity of the site.~~

**Amend HER POL 6 as follows;**

To protect the Outstanding Universal Value of the UNESCO World Heritage Site of Brú na Bóinne in accordance with the relevant guidelines and national legislation, ~~so that its integrity, authenticity and significance are not adversely affected by cumulative inappropriate change and development~~ **so that its integrity, authenticity and significance are not adversely affected by inappropriate development or change.**

**Amend HER POL 27 as follows;**

To protect, conserve and enhance the County's biodiversity, **where appropriate.**

**Amend HER OBJ 55 as follows;**

To preserve the views and prospects listed in Appendix 10, in Volume 2 and on Map 8.4 and to protect these views from **inappropriate** development which would interfere unduly with the character and visual amenity of the landscape.

10. No Change Recommended.

11. Amend Chapter 5, Volume 1 as follows:

MOV OBJ 11 : To require Mobility Management Plans and Traffic **and Transport** Assessments for proposed trip intensive developments, as appropriate. Please refer to Chapter 11 Development Management Standards and Land Use Zoning Objectives.

12. Amend Chapter 5, Volume 1 as follows: MOV POL 28: To promote the carrying out of Road Safety Audits **and Road Safety Impact Assessments** on new road schemes, road and junction improvements and traffic management schemes in accordance with the TII Publication TII-GE-STY-01024 and advice contained in the DTTAS (DTO) Traffic Management Guidelines 2012.

Amend paragraph four, p370 of Chapter 11, Volume 1 as follows:

Traffic and Transport Assessment (TTA), ~~and~~ Road Safety Audits (RSA) **and Road Safety Impact Assessments** are required to accompany planning applications for major developments with significant potential to generate traffic and or which could create ~~have~~ a significant **hazard or safety performance** impact on a major road, particularly national roads. When preparing the TTA's regard should be had to the provision of the NRA's '**Design Manual for Urban Roads and Streets** ~~Design Manual for Roads and Bridges~~' and the 'Traffic Management Guidelines, 2012'. Where a Transport and Traffic Assessment identifies necessary on and off-site improvements for the development to

be able to proceed, the developer will be required to fund the improvements by entering into a formal agreement with the Council.

13. Amend Chapter 11, Volume 1 OBJ DM OBJ 177 as follows: *'Advertisement structures will not be permitted where they give rise to a potential traffic hazard. ~~In general,~~ In accordance with the Spatial Planning and National Roads and the Guidelines on the provision of Tourism and Leisure Signage on National Roads (2011), advertisement structures will not be permitted at roundabouts, at traffic signalised junctions, at locations where they obstruct sight lines, compete with other traffic signs, give rise to confusion for road users or endanger traffic safety.*
14. No Change Recommended
15. Amend Chapter 5, Volume 1 as follows:  
MOV OBJ 62: To **avoid locating** ensure that residential development **and other noise sensitive land uses** in areas likely to be affected by inappropriate levels of noise. ~~inappropriate to residential use is avoided.~~
16. Amend Chapter 5, Volume 1 of Draft Plan as follows: *MOV POL 31: To have regard to the TII's **Policy on Service Areas (August 2014)** ~~Statement on 'Service Areas on Motorways and High Quality Dual Carriageways'~~ in the assessment of proposals for such developments.*
17. Amend MOV OBJ 59 as follows: MOV OBJ 59: **Where appropriate**, to require the provision of HGV parking facilities at on-line **and off-line** motorway service areas, petrol filling stations and other appropriate locations within the County in accordance with relevant planning guidelines and government policy.

Amend Section 11.8.1.4 to include the following text: The role of service stations has become more diverse with the expansion from merely selling fuel to also providing convenience services and goods including functioning as rest areas. Ancillary uses include tyre repair, collection points for online retail activity and self service launderettes.

Proposals for new and extended service stations will be carefully considered and will not generally be encouraged within the core retail area of urban centres or in rural areas outside of villages and rural nodes.

**The Council supports the development of on-line motorway service facilities in appropriate locations in accordance with the guidance set out in the Spatial Planning and National Roads Guidelines for Planning Authorities, DECLG (2012).**

Amend DM OBJ 102 to include the following bullet point: **the provision of HGV facilities, where appropriate.**

18. Include the following objective and renumber objectives as follows:

**MOV OBJ 38: The capacity and efficiency of the national road network drainage systems in County Meath will be safeguarded for national road drainage purposes, save in exceptional circumstances.**

19. Amend DM OBJ 147 as follows:

To require that any pre-application discussion and/or planning application proposal for solar farm development **includes a Glint and Glare Assessment** and sets out how the project complies with DM OBJ 146 above.

20. No Change Recommended.

21. No Change Recommended

22. No Change Recommended

23. – 46.

❖ Include the following Objective in the Drogheda Written Statement.

**STH DRO OBJ 3: To support the preparation a Local Transport Plans for Drogheda, in conjunction with Louth County Council and in consultation with the National Transport Authority and other relevant stakeholders.**

## 2.2 Group Submissions

# Group Submission no. 1

## Rural Housing Policy

<b>Submission No's.:</b>	<p>MH-C5-3, 16, 39, 50, 92, 94, 98, 133, 134, 135, 139, 141, 143, 155, 173, 176, 177, 184, 189, 191, 193, 212, 214, 221, 222, 255, 257, 263, 267, 268, 269, 278, 282, 292, 299, 300, 314, 323, 332, 333, 335, 339, 347, 348, 354, 389, 396, 399, 405, 408, 410, 414, 418, 431, 435, 438, 444, 447, 452, 454, 458, 459, 461, 463, 464, 480, 491, 492, 493, 495, 497, 498, 499, 504, 515, 534, 541, 564, 566, 580, 586, 591, 594, 597, 600, 606, 614, 635, 640, 646, 648, 651, 654, 657, 664, 666, 673, 680, 682, 700, 702, 706, 726, 727, 739, 741, 751, 755, 771, 773, 775, 778, 800, 804, 810, 811, 820, 822, 836, 851, 903, 910, 925, 928, 932, 935, 936, 937, 938, 939, 940, 947, 949, 955, 962, 964, 986, 987, 988, 989, 993, 994, 995, 996, 1000, 1006, 1008</p> <p>MH-C5-1427 to MH-C5-1749 (inclusive),  MH-C5-1756 to MH-C5-1775 (inclusive),  MH-C5-1777 to 2099 (inclusive)  MH-C5-2451</p>
<b>Submissions by:</b>	<b>(Please refer to Appendix A for list of corresponding names.)</b>
<b>Submission Theme(s):</b>	Chapter 9 Rural Development Strategy
<b>Summary of Submission:</b>	
<p>A large number of submissions relate to Section 9.5.3 of the Draft Plan i.e. 'Rural Housing Policy'. The submissions express various concerns, and in many cases, strongly object to the policy prescribed in the Draft Development Plan.</p> <p>For ease of reference, the issues raised are grouped into the following reoccurring themes:</p> <ul style="list-style-type: none"> <li>• General Issues</li> <li>• Requirement to have 25acres in family ownership.</li> <li>• Social Impact</li> <li>• Financial/Economic Impact</li> <li>• Returning Emigrants</li> <li>• Rural Node Policy</li> <li>• Towns and Villages</li> <li>• Mental Well Being</li> <li>• Existing Rural Housing Policy</li> <li>• Sustainable Building/Environmental Considerations</li> <li>• Alternatives</li> <li>• Other Considerations</li> </ul>	



Below is a summary of the issues raised. (Please note not all points are relevant to all submissions received).

### 1. General Issues

- The proposed policy will eliminate rural communities.
- Failure to allow one-off development in our community will have a detrimental effect on the survival of the fabric of rural Ireland.
- The implementation of the policy is wholly unfair, unjust and discriminatory to the people who live in the rural community, young people and to the people who might want to live there in the future.
- The concept of keeping the country side exclusively for a farming minority is discriminatory and greatly reduces people's quality of life by forcing them to reside in places away from nature.
- The proposals could have the most negative impact on Rural Meath since the famine.
- The policy needs to be revised to take into consideration those who have lived in rural Meath for their entire lives (where family generations were reared) and wish to continue to do so.
- The development plan is penalising people who have spent their entire lives in these communities.
- The development plan is victimising local people and young families with local needs by preventing them from living on their family land in their local communities.
- The proposals would force people out of their own communities and away from their families and friends.
- Younger and future generations denied the same opportunities as older siblings and family members to build in their rural communities.
- The County Development Plan has no regard for rural communities or its residents.
- This plan would prevent people building on their own land which would strengthen the rural community with new life and energy.
- Death nail for rural communities.
- Refusing planning permission on family land will single-handedly deteriorate rural amenities and cause irrefutable decline of rural villages in Meath.

- Rural dwellers wish to continue to live in rural Meath in areas where they love and wish to raise their own children in the community and countryside.
- The only people who wish to look for planning in rural areas are people from rural communities. This is an unfair action by Meath County Council.
- The drastic changes outlined in Section 9 goes against the very ethos of the foundation of the state.
- Reference is made to the Monaghan Development Plan 2019 -2025 which is considered to take a more balanced approach to rural housing.
- The Draft Plan has been designed by individuals whom have been raised in a city dominated lifestyle – not fully understanding the importance of rural communities.
- This is a European policy.
- It shows an astonishing lack of regard for our chosen way of life or the cultural significance of rural Ireland.
- The new development plan has complete disregard for current rural habitants and their future families.
- One solution for all regardless of circumstances is wrong.
- It is already hard enough for young people to start their lives out together without extra obstacles in the way.
- Expresses concern that no studies or research were carried out in relation to the very many negative implications these very radical changes to the rural planning policy will have on rural communities in Co. Meath. Suggests a pilot scheme for a small area before such policy is proposed.
- People that grow up in the countryside don't necessarily grow up on farms and this policy insults people that are born and bred in the countryside and have a right to live locally in the vicinity of their parents and families but also on the land that they were reared on or beside.
- It seems to me this plan was designed to be implemented without great advertising or education for the people on its severity.
- The policy goes above what is required at a County level in the context of the 2005 Rural Guidelines and the absence of any replacement document.
- Accepts Climate Change issue and that the current status quo is not sustainable and not totally opposed to linking rural housing to economic activity. However, the new policy is too narrowly implemented and differentiates/discriminates between the big farmer and small farmer who rents the land.
- Refers to the 'Local Housing Need' European Court judgement .

- However, contends that we can meet our 30% compact growth requirement without having to curtail one of housing.
- The proposed Rural Development Strategy is seriously flawed in how 'local needs' will be determined. There is an assumption made that everyone that lives in rural county Meath are in some way connected to agriculture. This is not the case.
- The Plan has a total disregard for the people and generations before them who made this remote Island the honoured state it represents today.
- It is the contention of rural North Meath dwellers that this plan is flawed, is discriminatory and should be totally revised.

## 2. Requirement to have 25 acres in family ownership.

- Many submissions object to the requirement to have a landholding in excess of 25 acres and be a member of a farming family.
- The proposed policy discriminates against non-agricultural families, rural communities and small farmers who wish to remain living in rural Meath and do not own in excess of 25 acres.
- This is an unfair action by Meath County Council to only allow people who have 25 acres to apply for planning. People should have the right to build with in regulation on their land.
- Unacceptable that people be prevented from building a home, on their family land and living in the rural area in which they have lived all their lives, because they do not have a land holding in excess of 25 acres or a member of a farming family.
- The Draft Plan does not take account of a huge number of existing farming families.
- The policy has completely disregarded the small-scale farmer as it only benefits big scale farmers with in excess of 25 acres.
- The Draft Plan will leave small farmers with land that is worthless and with no younger generations to continue in an inherent lifestyle that has been in the one family for many previous generations.
- Many people living outside villages and towns are not involved in farming or are farming less than 25 acres. Such individuals and families are valuable additions to the communities in Rural Meath.
- The number of farming families nationally is declining year-on-year as farm sizes grow therefore limiting the criteria.
- To create a sound rural housing policy, it must include those families who grew up in the area and not only those with large landholdings.

- People should have the choice to build a one-off house on land they own. There are enough restrictions already put on people trying to obtain planning permission and this will make it impossible to live in rural areas.
- No future value on small holdings of land in Rural Areas.
- This figure of 25 acres seems to have been conjured or plucked from thin air which is a farcical figure in my opinion. This automatically disregards the population of Moynalty of who don't come from agricultural backgrounds which is outright discrimination.
- Rural communities are the very fabric of our culture and heritage and our rights as individuals to own our own home in the area we grew up should be protected as much as is possible.
- The fact that a person applying for planning permission in a rural area has to be actively farming 25 acres of land for 10 years will render it impossible for farmers to apply. If they have to wait for 10 years after they have started farming most of them will be too old to start building. If they buy a house in the nearest town they will be travelling to work resulting in additional workload and carbon emissions.
- The council should continue to allow one off builds on infill sites that are within a reasonable distance (5-6 Km) of the hub/towns, by local family members.

### 3. Social Impact (Impact on Clubs, Rural Communities, Population decline)

- The Draft Plan will damage the social fabric and take away the lifeblood of rural communities across the County.
- The policy will have a negative impact on the vitality and viability of rural areas and many rural communities. Specific references are made to several rural communities, villages and community organisations in this regard including Meathill, Carlasntown, Kilbeg, Moynalty, Drumcondrath, Summerhill Dunderry, Robinstown, Kilbride, Ballinlough, Croassakiel, Kilscryre, North Meath area etc.
- The devastating impact of restricting permission for potential homes will ensure the complete destruction of country life as we know it in our locality. Specific reference made to Moynalty in this regard.
- By forced depopulation of these communities, schools, clubs and churches will be forced to close and reduce in size, thus causing further erosion of a way of life that has proven to be beneficial to healthy cultural, physical and psychological development of our young people.
- The contribution of local people is invaluable to the farming, non-farming and business communities alike.
- Further decline of populations in rural communities over the years as families grow up and are forced to move into towns and villages.
- The restrictions on rural one-off houses in the Draft Plan will mean few, if any, new houses will be built across the county and rural parishes will continue to decline.

- Local parishes including that of Kilbeg ( which includes the village of Carlanstown) are currently sustained and enriched by the local community that live both in the village and the large rural hinterland that surrounds it. This appears to be overlooked in the Draft Plan.
- Rural areas such as Kilbeg will come under threat if the draft County Development Plan becomes a reality.
- The Rural Development Strategy will have detrimental effects on all Local GAA Clubs and other similar societies. (Numerous submissions have been made by rural GAA Clubs expressing opposition to this policy). This plan will cause the disintegration of all local clubs and societies due to future generations all living in urban areas. In order for GAA clubs to continue to exist while maintaining our identity, we need a community which is thriving and nurturing youth and families. The proposed Development Plan will have a detrimental effect on their future existence. This is a huge part of Irelands culture and heritage, GAA clubs will suffer and become under pressure to field a team. Some already under existing pressures re numbers. A lot of recent investments in GAA clubs. This in turn will impact the living quality and socializing of people in rural areas. The GAA is the heartbeat of communities in Ireland, so effectively this new proposal would be removing the heart of the community. In some cases after decades of blood, sweat and tears of development, fundraising and volunteerism to create an epicenter of the local community. Submissions outline the role, contributions and importance of the local GAA club to the rural community. The rural-urban shift is currently a major concern for the future of GAA clubs in rural areas. Clubs will join together and object should this policy be advanced.
- Will dramatically impact local organisations and will restrict people who wish to live in rural areas from contributing to rural development. It will only serve to reduce the quality of life in rural areas by removing the option for people to live in these areas.
- Negative effect on local business such as shops, bars, restaurants etc will be huge. Resulting in loss of earnings, jobs etc.
- In addition to achieving compact growth, it is important that a sense of place is created in the local environment that strengthens the connection between people and the place they live and work. This will improve the interaction people have with local amenities, create a local identity, thereby assisting in building a community.
- Population decline in rural areas which will result in a loss and downgrading of existing amenities, examples being post office, shops, pub, village playgroups, churches, schools.
- Local rural communities will become isolated and be deprived of rejuvenation of young new families residing in the area.
- Impact that this plan will have on local country schools. These schools provide employment for local teachers and local schools for children, it creates a sense of community. With this plan, schools will be forced to shut as numbers will decline. Some submissions refer to specific schools in this regard including Kilbeg NS.
- The Draft Plan eliminates any possibility of development of rural schools. Areas of land surrounding schools have been designated for limited residential development therefore leaving no room for necessary expansion or, indeed in a lot of areas, adequate facilities.

- Long term impacts will be harmful for all rural communities and will lead to severe problems in years to come: with small business closures and school numbers depleting and then leading on to ceasing of GAA club teams in all age groups.
- Degrading the sense of community for existing residence by forcing people into urban and built up areas only leads to isolation and reduced support structures in these communities. It will also result in more institutional led care.
- The proposed plans would drive the younger generations away from their homelands and away from elderly neighbours. You would leave vulnerable, isolated elderly people alone in their homes with no neighbours to call on for support.
- With people living longer it is important that provision is made to allow older people to live independently in their local community for as long as possible.
- Isolation for farmers and elderly farmers.
- Impact on farming life particularly smaller farmers.
- Desire for children to have the option to buy a site and build their own home when the time comes.
- Negative impact on family relationships.
- The Draft Plan will have major implications for my family members who have lived in the area for generations, have land available and aspire to build on these family lands to ensure close family ties are not compromised.
- The provision of support systems for our ageing demographic is not supported by this plan as it does not take into consideration that most care can be got from within a healthy community.
- Through a lack of opportunity for future development, age profile will increase with a lack of opportunity for young families to settle in our area.
- A long history of developing our strong and vibrant community will be lost.
- Members of a parish should be allowed live in anywhere within that parish regardless of their profession, otherwise rural communities will wither and die.
- Having lived all their lives in rural Meath, people wish to continue to do so and raise their own children in that community and countryside. Parents will no longer be able to rear their children in the quiet and unspoiled nature of the countryside and the sense freedom that comes with it. Instead children will be forced into playing in community parks and recreation facilities which is optional under the current situation. Here children could possibly be exposed to antisocial behaviour and other negative social circumstances.
- The National Planning Framework (NPF) supports the sustainable development of rural areas by encouraging growth and preventing decline in areas that have experienced low population growth or decline and by managing the growth of areas that are under strong urban influence to avoid over- development, while sustaining vibrant rural communities. Many areas within County Meath are experiencing rural decline as many people are

moving to the bigger cities for work etc. Restricting the number of houses in rural Ireland will guarantee a rapid decline in population in those areas.

- One submission writer queries whether the people of Moynalty are being punished for living in the less prosperous region of this county. Former 'rural' villages in the South of Meath have seen populations soar in recent years as they provide a back door entrance to the Capital machine that is Dublin city.
- Requests that the Council does not let rural communities die.

#### 4. Financial/Economic Impact:

- The future of rural enterprises and small business owners, whether already in business or future businesses, will not be a viable option. Many rural families have both commenced businesses and supported rural businesses for centuries.
- For people setting up business in their communities and providing much needed economic stimulus, the provision of housing for workers nearby is important. It also compliments other parts of the development plan that pro-ort to reduce the load on our infrastructure by reducing peoples commute to work and their carbon footprint.
- The proposed changes will damage the counties economy through the loss of jobs in reduced need of small tradesman. Local building suppliers etc. will also feel the effects of these proposals as demand for construction supplies will decline rapidly resulting in closures and loss of jobs.
- It is important that people working the land on behalf of farmers should not be prevented from living in the community in which they work. Such a policy removes the opportunity for these skilled operatives to live and work in the same community, it will lower the availability of these vital skills for the future development and support of the Irish farming and food sector in rural Ireland.
- This means a farmer has to allocate 25 acres to each sibling to seek planning permission. What is the economic viability of sub-dividing farms?
- This proposal will have a detrimental effect on the already pressured housing market within the country. Limiting the land in the whole county to only a few sites in each area will result in a scarcity of resources and a high demand for land.
- A significant increase in demand for houses which are being sold by private sellers. Therefore, the cost would be unimaginably expensive.
- The Rural Development Strategy will end up costing all younger generations from a rural background substantially more than is required in order to get on the property ladder.
- Reference is made to the housing crisis, strict mortgage controls, high rents and house prices. This policy will remove the only viable option open to a large population of rural Meath of ever owning their own family home.

- Amid a national housing crisis and rising examples of rural decline all around the country this is an extremely rigid approach to adopt.
- It is stated that rural house builds would help ease the housing crisis.
- With very limited zoned land available around the villages of North Meath, the demise of these communities is a very real possibility. The cost of these sites will be exorbitant and will rule out many young people settling in their preferred local area.
- Rural dwellers will be taking on the responsibility of building their own home, therefore taking pressure off Government and Local Authorities.
- It is considered that acquiring a site in a rural node will result in extra financial outlay.
- The affordability of houses in towns are out of reach for most young people, with most new house prices starting at 300,000 euro plus. Reference is also made to high house prices given the lack of affordability in Dublin and the resultant pressure on commuter counties.
- It is submitted that this policy will increase the price of new builds in towns and therefore create more demand for affordable and social housing.
- The plan would increase the amount of people seeking housing assistance payments.
- There are not enough affordable houses being built within the town to meet current demands and affordability issues in towns.
- Any measure that could lead to a reduction in the supply of housing during this crisis would not be prudent at this time.
- Will increase the cost of housing for current and future generations living in Meath resulting in a further shortage of housing.
- The Draft Plan will end up costing any younger generation from a rural background substantially more than is required in order to get on the property ladder.
- Rural families who own land, whether in small holding or large holding, should be entitled to use this land to build a residence for their younger generations to come. Otherwise younger generations from rural families will never own their own residence.
- Hardworking local should not be deprived owning their own homes.
- The plan makes no provision for how the designated land will be made available for people who qualify and want to build a house . Supply and the cost of land is the biggest impediment to house building and affordability.
- The cost of renting limited properties in the urban areas that rural generations are been forced to live in will be at a premium, which will not be affordable and therefore lead to even more young families struggling and the possibility of ending up homeless.



- Landowners who want to sell sites should be allowed to do so if they so wish. The rural community is a very valuable asset.
- Family landholding should be considered as a rural resource for rural dwellers other than those involved in agriculture/farming.
- No future value on small holdings.
- No prospect of new small and medium enterprises and no hope to sustain small and medium enterprises already in business.

#### 5. Emigrants

- Returning emigrants will never be afforded the opportunity to return to their local areas and will now instead be forced into larger towns and cities.
- It will no longer enable young couples, who have maybe travelled or moved away from home, to move back into their rural communities and perhaps start families.
- Disappointment of potentially having to apply to the proposed 'nodes' for permission to build on land that is a part of our heritage.
- The policy will add to the already long list of educated and talented people that are leaving the country for a better and more affordable life.
- I have recently returned from Australia hoping to build a house on family farm land if I am unable to do this I will return to Australia reluctantly.

#### 6. Rural Node Policy

- Rural Node policy is flawed.
- This is not suitable to rural family life. In addition, there are no road networks, services. When or if these are provided there will be no maintenance of same as current road networks, cannot be maintained, without additional ones for future.
- Not everyone has any desire to live within a very limited "rural node" which won't even scratch the surface of the demand on rural housing.
- No rural nodes in my locality selected for one off rural housing. Some areas cited include Ballivor, Kildalkey etc.
- The nodes also hand full control to the landowners of these folios, enabling them to charge whatever they want for a site.
- The Rural node specified for Moynalvey does not cater for the organic growth of the parish as it primarily consists of existing church, houses, school etc . It can cater for a few houses at the most which is incapable of supporting current needs to the parish.

- The rural node of Meath Hill is unsuitable and not sufficient and would result in pushing up the price of these sites.
- In the vast majority of the nodes, no services such as water, sewerage or broadband provision is available.
- Who will provide the infrastructure/ access roads/services in the rural nodes?
- The selection of some nodes is questioned when more suitable settlements overlooked.
- There is no consistent approach in deciding whether a townland qualifies as a rural node or not as Carnaross along with many other rural communities have not been considered as rural nodes.
- Some nodes are already built and others have limited availability and will not meet the demand that exists locally . (Kilbeg, Newcastle, Ardcath are some of the nodes stated in this regard. ) Reference is also made to numerous settlements throughout the County which have been overlooked including Carnaross, Moynalty, Carlanstown, Kilmainhamwood, Kilmainham, Nobber, Carlanstown, Drumcondra, Gibstown, Rathcarran, Kilmessan, Kildalkey, Cormeen.
- There is very little land to work with in some of the Nodes and it is proposed that people go and buy land and let their own family owned land go to waste.
- Land in the rural nodes would give rise to a speculation culture and would drive up unfairly the price of land near a village. In effect this does not meet the requirements of the rural dwellers who already have some farming land nearby.
- There does not seem to be a consistent approach in considering whether a townland qualifies as a rural node or not. The proposed designated “rural nodes” are in many cases on private lands and will be unaffordable due to their limited availability.
- Land in nodes are typically owned by farmers who in many cases will not sell them as residential sites as they have been passed down the generations to them.
- It will increase the cost of this land because the council is creating an artificial land shortage.
- There are no rural nodes or lands remotely close to my current home address or other surrounding areas set aside for one off dwellings.
- There are plenty of sites outside these designated nodes in County Meath more than suitable for applicants to build their desired homes to set specifications, while not taking away from the county's natural beauty which the plan states it aims to protect.
- The lands identified in Newcastle, will not meet the demand that exists locally.
- Land zoned in Ardcath includes the local GAA club. Technically none of the land that is zoned for housing is actually available to build houses on.

- The permissible distance (between existing rural residents and a Rural Node) of 12km for rural residents to be applicable to construct a house in a Rural Node is unsustainable and goes against all the principles of Rural Node ideology.
- There is no rural node less than 14Km from family home which is not in line with “Maintaining close family ties” (Submission writer from the Baytown, the Ward)
- There should be a Pilot Scheme for a Rural Node as there are many issues to be addressed.

### 7. Towns and Villages

- This development plan is attempting to force people, whom have spent their entire lives in rural settings, into towns, cities and villages.
- People that have grown up living in a rural area should not be forced with no choice to live in an urban setting with no privacy or space.
- The proposed policy will increase house prices in towns and villages.
- Increase in demand for housing in towns, leaving many people unable to afford their own home.
- The Draft Plan is prioritising the over-development of towns and villages at the expense of rural families. Ireland has a long tradition of dispersed settlement. This settlement pattern benefits out local tourism, If the locality becomes uninhabited and all the young life goes from the area, it would have a detrimental effect on all the townlands, hinterlands, towns and villages in the County.
- People will be driven into urban areas, were there currently are few affordable houses and major lack of infrastructure and services.
- Pressure will increase on facilities and services within towns and small villages and social implications. The infrastructure in towns are insufficient to meet the current levels of population.
- There are not enough affordable houses being built within the town to meet current demands.
- People will be forced to pay high house prices and rents in towns.
- It makes absolutely no sense driving people back into the already over populated towns with high cost of living.
- Do not ostracise rural people and force them into overcrowded towns and cities, devoid of community and soul.

- Insufficient land zoned and no infill development opportunities in some of the villages and towns to accommodate the housing needs of the area. Carlanstown, Moynalty and Nobber are some of the villages specifically referred to in this regard.
- Specific reference is made to the unit allocation to Moynalty and that removal of previously zoned lands in the Draft Plan. It is submitted that the slow growth rate in Moynalty is destined to become a trickle or disappear altogether in the next 5 years because of the age profile and the lack of any zoned suitable land which has any real chance of being built on during the lifetime of the next CDP. This will be exacerbated if the Draft CDP becomes reality and strictly restricts development in rural areas.
- In a village with such huge potential such as Nobber, with all the heritage and the development of a greenway planned, it seems utter insanity to limit development – particularly at a time when all figures would suggest potential for far greater growth in population
- Due to lack of availability of affordable housing in Dunboyne, locals will be obliged to move elsewhere.
- The Draft Plan forces all future rural families will live in urban areas. These built up areas have much higher rates of unsocial behavior and crime levels in comparison to rural areas which leaves these areas harder to police, as can be seen in many suburbs of Dublin.
- People who would have typically built in the countryside will now be forced to move into already overdeveloped towns. This legislation does not address the bottleneck it will create. Instead of more land being available to build housing there will be less.
- Meath towns cannot keep up with current housing demand as it is. This policy will make it worse.
- Due to the lack of building space in rural villages, it is not feasible to as proposed in section 9 of the Draft Plan for locals to now live in the area of their birth.
- Questions whether the future is going to be one where all investment will be sent towards urban centres?
- Some of the most isolated people are those living in housing estates and towns. Their isolation stems from not being close to family who can offer invaluable support. In some severe cases isolation contribute towards poor mental health which has in turn led to children coming into the care of child protection services.
- Questions whether rural people being treated fairly when they are compared to their counterparts in urban areas.
- Policy will make people who own land close to towns and villages very wealthy as this is the only land that can be built on.
- We must keep a balance in rural and urban areas at all time.

## 8. Mental Well Being

- The Draft Plan has no consideration for the mental wellbeing of any rural resident, who has resided in rural areas for numerous years and possibly their whole lifetime, and how their mental health can be affected by this forcing them to move to and live in urban areas.

#### 9. Existing Rural Housing Policy Meath County Development Plan 2013-2019

- It is considered that the current local needs requirements for planning permission in Meath are stringent enough.
- It is submitted that it is difficult enough to obtain planning permission in rural Meath settings and that these changes will make it near impossible.
- At present it is difficult to obtain planning permission in rural Meath settings. These changes will make it near impossible. There is a shortage of houses at present.
- Some of the submissions requests that an additional category i.e. Category 3 be included in terms of Local Need Criteria i.e. reverting to existing CDP Rural policy. ( As per the existing policy it makes provision for applicants with unacceptable health circumstances and applicants who previously sold a dwelling due to unavoidable financial circumstances).

#### 10. Sustainable Building/Environmental Considerations

- New rural builds are environmentally friendly homes. Using local builders, companies, materials and renewable heating resources will decrease the carbon footprint of the buildings and ensure the houses are capable of functioning more sustainably than houses built under the previous regulations.
- Encourage improvements in water quality.
- To address sustainable development and as an alternative to this policy re-educate farmers and rural communities in more sustainable style of living.
- It will render the rural land worthless. It gives precedence to wildlife habitats over people's homes.

#### 11. Alternative policies put forward.

- A number of submissions request that rural housing policy be amended to reflect the issues raised. Revised criteria in terms of local housing needs is prescribed.
- Various alternative amendments are put forward in this regard including the following proposals:
  - Applicants are required to have been born and raised in the area in which they wish to build their first home.
  - Extend from 5 years to 10 years the requirement to have lived in the rural area in which the applicant wishes to build.
  - Applicants will be restricted to building on their family owned land only, which will have been within the family's exclusive ownership for a minimum of 10 years.

- The period of occupancy will increase to a period of 7 years from date of first occupation.
- In addition to Category 1 and Category 2 as detailed in RUR POL 14 a third category of person be devised. These will be people who can demonstrate, by way of documentary evidence that they are intrinsic and established in their respective rural community. They must also be able to prove that they have lived in this rural community for a period of years in advance of making their application for planning permission.
- A policy should be put in place that facilitates the settlement of local people in their own local community who are actively engaged in farming. In addition, the following other categories of people should be facilitated with housing in their community. For example:
  - People who are originally from the local rural area but are not involved in farming or a rural enterprise.
  - People who may have left the area previously for employment or other reasons and have now returned.
  - People who intrinsically involved in their community.
  - People who are involved in community and/or sporting organisations in the area.
  - People from the area who cannot afford to purchase houses in urban areas.
- The following alternative policy is proposed:
  - Increasing the size of rural nodes including Moynalvey to more meaningfully support local communities.
  - Specify planning prioritisation not in terms of land ownership but requirements to be near / support parents , other family members / requirement to have lived in parish/area for previous 10 years .
  - For new houses- specify increased distance from road to reduce visual impact.
  - Focus on providing broadband in all rural nodes to support work-at-home / reducing commute times etc.
- Other alternative policy proposed is that applicants who intend to build on their family lands shall justify that the land has been in the family ownership for more that 25 + years inclusive and shall justify this by way of appropriate documentation.
- Adjustments to the current criteria may be needed and welcomed, however the new development plan is a step too far.
- Alternative measures ensuring that rural housing is sustainable with low impact on the surrounding countryside is preferable to this plan of rural de-population.
- The points raised in the Draft Plan in relation to the current development patterns being inadequate are valid but the mechanisms to replace this system are not in existence. There is no framework where a group of people wishing to develop at one location can do so, as the practicalities of obtaining finance at similar times and obtaining agreement on plans highlights the individual nature of this process.
- The Plan need to outline more clearly what exactly is meant by ‘building up the capacity of rural villages and rural nodes and also designate specific sites where ‘clachan style development’s will be allowed.

- If Meath Co. Council are serious about securing the economic and social future of its rural areas a ban on once off housing, without a realistic published alternative is an extremely drastic and short-sighted approach, particularly regarding the size and location of nodes.
- If Meath County Council want to restrict housing in this way, they need to facilitate the provision of alternative housing opportunities in local areas.
- Alternatives are proposed which are considered would offset any environmental damage that may be brought about by continuing to allow one off housing in our countryside. Including, sustainable rural housing buildings, incentives re derelict sites, encourage local employment opportunities, environmental education and promotion of renewable energies.
- It is considered that through encouraging community development increased environmental benefits would be generated.
- There is a need for the local authority to make better and realistic accommodations for non-farming families/persons that currently reside in rural Meath and who are intrinsically connected with their local communities.
- Meath County Council need to put in place a policy that facilitates the settlement of local people in their own local community.
- We should build at least 3-4 houses together in rural areas where possible in safe areas away from the road and low areas that might be subject to flooding.
- Alternative policy- 'While recognising the restrictions being imposed on once off housing in rural areas in this Development Plan, the Council will facilitate the provision of individual sites in Moynalty and other local villages and rural nodes, for local people who do not wish to live in housing estates or built up areas. Meath County Council will identify lands contiguous to Moynalty, in consultation with the local community and land owners in the area for the provision of a clachan style development or for the provision of individual sites for local people not eligible for once off houses in their local area.'

## 12. Other Considerations

- The policy represents a contradiction to what is being rolled out as part of the National Broadband Plan.
- The policy does not comply with the requirement of rural development strategic objective 1 "To support the continued vitality and viability of rural areas, environmentally, socially and commercially by promoting sustainable social and economic development.
- A series of questions are put forward to the Council including - why is this policy being introduced in Meath and not throughout Ireland? why does it seem to be more attractive for young people to emigrate? Did you get to choose your forever home? Did you get to build your own house? buy a site from local farmers? and live close to your family home?
- The rural housing needs for people living in Carnaross and many other townlands in rural Meath have not been catered for in the proposed amendments to the Rural Development Strategy.

- An objective of the proposed Development Plan is to "protect the rural resource for rural communities". Land can be classed as a rural resource and rural communities comprise of people other than those involved in agriculture.
- Rural dwellers comply with the condition to reinstate hedgerows following one off housing construction. However, the Council does not and have used many small pockets of land to store sand, gravel, etc. These areas should be given back to the landowners.
- If people do not have a site and wish to live in their parish then social housing should be provided at a reasonable cost and people should not be expected to provide their own services.
- If this plan was being rolled out nationally at the one time, there would be 'uproar'.
- The county development plan should be focused on increasing resources in rural communities. Better public transport and much better internet access.
- Rural families have, for generations, cared for and looked after "Rural Ireland" - This should not be taken away.
- Meath County Council should omit section 9.5.3 in its entirety.
- Rural developments have not adversely impacted on road network capacity. Commuter traffic from outside the area and HGV movements are responsible for the degradation of local roads and verges. Reference made to local road between village of Kilbride and Ashbourne. The council needs to review their strategy on the movement of articulated vehicles along these local roads. It is submitted however, that this should not be a reason to restrict rural housing.
- If Meath County Council allow this planning strategy to go ahead, they will have failed the people of Meath and future generations of rural Meath people.
- Respectfully request that the Draft Plan is not adopted in its current form and to please make provisions for local people to continue to live, work and grow up in the communities they love and nurture.
- Strongly urge the council to reconsider the proposals in this Draft Plan. The current local needs requirements for planning permission in Meath are stringent enough to only allow those with actual local needs build in the communities in which they have grown up.
- There requires a change in policy in order to facilitate genuine rural county Meath people who have a right and entitlement to continue to live in their rural community.
- A separate but related issue raised stated was that the Draft Plan, so important to the future of Meath, should have been on public display in communities and more easily accessible particularly for older members of our community who may not even have access to online copies.
- 1 no submission raises concerns in relation to the rural housing policy and covers many of the issues raised above. It also refers to the rural housing policy in Brú na Boinne area and



states that it is almost impossible to get planning permission in this area. A comparison is made to lands in close proximity in Co. Louth whereby it is submitted that there are no restrictions.

#### **Chief Executive's Response**

The broad ranging concerns outlined in the large quantity of submissions received in relation to the Rural Housing Policy outlined above are fully considered and acknowledged by the Council.

The National Planning Framework and Regional Spatial and Economic Strategies provide a settlement framework for Local Authorities to sustainably manage future rural housing development. Meath County Council had been advised by the DHPLG and Eastern and Midland Regional Assembly at the commencement of the review of the County Development Plan that the current Rural Housing Policy was not sustainable, particularly regarding the level of commuting from rural areas to Dublin, and therefore not in compliance with the recently adopted statutory NPF or subsequent adoption of the RSES. To this end, proactive measures were set out in the Draft Plan to attempt and address the above and to promote nucleation in rural villages and rural nodes which will ultimately help reduce sprawl and allow for more efficient and sustainable use of resources.

The current policy in the Meath CDP 2013-2019 is not compliant with National and Regional Planning Guidance. Continuation of current levels of rural housing will result in irreversible damage to the rural environment including water quality and landscape character, further promoting unsustainable travel patterns that would continue to have detrimental impacts on the need to reduce carbon emissions. It is of note that all key bodies such as the OPR and EMRA have endorsed the current rural housing policy.

The Draft Development Plan seeks to create opportunities for farm families to reside in a rural environment where they can contribute to the social capital of rural areas. Furthermore, persons with intrinsic social links are considered favourably in terms of local housing need in Strong Rural Areas. The Draft Development Plan seeks to secure the long term vitality and viability of rural nodes by facilitating the housing needs of non land owning rural dwellers in the extensive network of rural nodes. The Draft Plan offers locals an opportunity to locate in a rural node within circa 12km radius of original homestead. In addition, the network of nodes has been examined and updated to ensure increased development opportunities at such locations for a range of categories of potential rural applicants as set out in the Rural Development Strategy of the Draft Development Plan.

However, it is evident from some of the observations received that there is some ambiguity with regard to the Rural Housing policy as currently presented in Section 9.3. To this end, this section has been restructured and offers clarity with regard to a number of aspects in particular relating to Social/Intrinsic Links in Strong Rural Areas, and also highlights the various instances/opportunities in all Rural Areas for alternative rural accommodation where local housing need is not a requirement. The proposed revisions will highlight that the revised rural housing policy is clearly not a ban on one off rural housing as portrayed in many submissions but rather a refinement of the current policy that will ensure more sustainable numbers of people living in rural areas with the remaining balance being offered alternative rural housing options in local Rural Nodes and Villages.

With regard to the specific issues raised in relation to Brú na Boinne, the primary policies and objectives for the UNESCO World Heritage Site of Brú na Bóinne relate to the preservation of its Outstanding Universal Value.

#### **Chief Executive's Recommendation**

It is recommended that the rural housing policy as set out in this Draft Development Plan offers the most sustainable rural housing policy that complies with National and Regional policy while addressing the needs of rural communities to greatest possible extent. For the purposes of clarity, it is recommended that the rural chapter is restructured to reflect the spirit of the rural development strategy. Please refer to Appendix F in this regard.

Group Submission no.

2

Ashbourne Public Park

<b>Submission No.:</b>	MH-C5-63, 180, 234, 240, 242, 248, 253, 256,262, 264, 271, 273, 280, 284, 304, 345, 349, 355, 356, 366, 370, 387, 393, 421, 436,477 486, 490, 511, 512, 520, 547, 555, 568, 592, 608, 609, 610, 634, 678, 686, 687, 690, 694, 717, 722, 765, 770, 780, 790
<b>Submission by:</b>	<b>(Please refer to Appendix A for list of corresponding names.)</b>
<b>Submission Theme(s):</b>	Chapter 7 Community Infrastructure Strategy and Volume 2 Ashbourne Settlement Strategy.
<b>Summary of Submission:</b>	
<ul style="list-style-type: none"> <li>• A reoccurring theme in the submissions received relate to the provision of a freely accessible Public Park of adequate size (33.4ha in area referenced in a number of submissions) in Ashbourne as well as additional adequate green space in the town.</li> <li>• There is a consensus in the submissions received that Ashbourne is very under-resourced when it comes to green space and needs a large park.</li> <li>• It is submitted that residents of Ashbourne of all ages deserve a public park where the community can walk, run, enjoy nature, engage in sports and recreational activities, walk dogs and avail of all the positive benefits a public park offers. A lot of the current green space and facilities are part of private clubs and not available to the public.</li> <li>• It is submitted that there is not enough provision in the Draft development Plan for a new Park in Ashbourne.</li> <li>• The lack of green space in Ashbourne and a park is regarded as nothing short of a scandal.</li> <li>• A detailed submission was made by Ashbourne Playspace Network which is an advocacy group comprised of actively engaged residents seeking to increase the quality and availability of public open space in Ashbourne, Co Meath. Other submissions received restate the issues raised in this submission.</li> <li>• This submission by the Ashbourne Playspace Network and others welcome the proposal in the Draft Plan i.e. Master Plan 3 for the inclusion of a public park in the zone and also SOC OBJ 12 which supports the delivery of a town park in Ashbourne. However, concerns are highlighted that the proposed 15 ha (minimum) to be provided for the park does not meet the current or projected needs of the town. In this regard, reference is made to findings of research commissioned by Ashbourne Play space (prepared by Future Analytics Consulting Ltd.) which highlighted a requirement of 33.4ha of freely accessibly public open space to meet the current and projected growth by 2026.</li> <li>• Numerous other submissions urge the Council to commit to the delivery of a regional park of minimum 33.4ha in line with the recommendations and findings of the Ashbourne Playspace Network.</li> </ul>	

- It is stated that the future provision of parkland will mostly comprise a retrofitting of amenities that have been long overdue. Submission refer to the level of growth in Ashbourne and the need for the necessary infrastructure i.e. to a regional sized park to meet the needs of the residents.
- It is considered that Ashbourne as the 2nd largest town in the county and consider that it has been neglected too long. Comparisons are made to the level of green space/park provision in other settlements such as Navan.
- It is stated that the current situation is not only detrimental to mental health, it is also a health and safety issue with nowhere for children to play except on dangerous roads.
- A park is so vital to wellbeing of children, the elderly, teens and for those commuting.
- At present there is no where safe to cycle with children, there is no where to go for a picnic or a long walk away from cars.
- Concern is expressed in relation to the design of 'the refreshed park'.
- A submission queries where is the linear park which has been promised for ten years?
- Submission urges MCC Elected Members to start delivering for the town.
- It is claimed that MCC are behind all other County Councils in terms of investment in parks and green space.
- It is stated that MCC need to increase the quality of life for the families already living in the town.
- It is considered that Ashbourne has taken on more than its share of house builds with zero amenities for the people living here and needs among other things more green space.
- It is requested that the new park includes a playground for children.
- Submission outline the need for playgrounds in or near housing.
- States that many of the 21 Sport facilities in Ashbourne are at breaking point.
- Highlights the need at a minimum to complete the Linear Park in its entirety (7 zones, only zone 4 completed). Please deliver at a minimum the linear park project in its entirety.
- Submits that planning for amenities should be a holistic process whereby the existence or otherwise of such amenities is a key criteria when deciding on applications to build new houses.

- It is also stated that Ashbourne need more activities for teenagers and kids to do, like a skate park, boxing rink, bowling alley etc. Some submissions also reference the need for a public leisure centre and swimming pool.
- It is considered shameful that a public Park has been ignored as an issue in Ashbourne for so long when physical and mental health of our citizens should be addressed.
- The priority for open space is questioned.
- It is claimed that there has been an increase in anti-social behavior in Ashbourne and that Planners should be very mindful of recreation space versus livable space or anti social behavior will increase.
- Highlights the importance of greenspace to physical and mental health as well as general wellbeing.
- It is suggested that the council should lower rates and fill all the vacant shop units in the town to generate ongoing revenue for the council instead of selling off every bit of green space in the town at the cost of its residents.
- Several submissions which seek the provision of a Public Park in Ashbourne also makes reference to the provision of open space within housing developments. Some express opposition for the development of housing on designated green spaces in current housing developments. Specific reference is made to the existing situation in Millbourne green space.
- It is stated that MCC need to adopt a progressive approach to designing the town and building communities with free space for children not just building estates with no amenities to match the population moving in.
- It is submitted that the council need to ensure that there is enough green space left in new developments for the residents to use.
- It is stated that the playgrounds in Churchfields Housing Estate should not be included as public amenities as they were built by Cairn for residents only.
- It is submitted that houses should not be built in an area that has no amenities for the families living there, until the council have provided a Recreational park, sports facilities and green spaces for the current and future residents.
- One submission also states that cars need to be reduced in the town .
- It is claimed that Meath County Council are failing to acknowledge the needs of this growing town.
- One of the submissions which refers to the Future Analytics report (and includes as an attachment) states that is an impressive document, cogently arguing the case for a specific greenspace requirement for Ashbourne for Community park/s etc. It is stated

that its assumptions and conclusions have not, been formally challenged by MCC. The report is accepted generally by the residents of Ashbourne as the authoritative statement on the issue of Greenspace requirements. It is requested that MCC's views on this report should be put on record and state whether MCC accept the salient points in the report, and if not explain why.

#### **Chief Executive's Response**

It is acknowledged that the creation of public accessible green space to serve the Ashbourne is required. In order to strengthen the community in Ashbourne and to make the town a more attractive place to live, provision is made in the Draft Plan for a public park. The identified location for the park in the draft plan is to south east of the town as part of MP3. However, following further consideration and having regard to the issues raised in the submissions received, it was considered appropriate to identify alternative lands which are considered more suitable for the provision of a public park in Ashbourne. There is a substantial landbank to the south west of the town between the M2, R125 and the R135 which are proximate to the town centre and existing residential areas and neighbourhoods. Following an assessment and review, these lands are considered sequentially preferable and more suitable as a location for a public park and it is envisaged will provide flexibility and scope in terms of the size and delivery of the public park.

It is therefore considered appropriate to revise the written statement and include reference and an objective to deliver a public park on the aforementioned lands as the identified preferred location for the town park and amend the written statement accordingly. The zoning of the subject lands will be addressed as part of the forthcoming Ashbourne LAP. Please refer to submission no. 411 for further detail in this regard.

Notwithstanding the above, it is noteworthy also, that the proposed new park will supplement the Ashbourne Linear Park which runs along the route Broadmeadow River to the south of Ashbourne. A specific objective is included in the Draft Plan to complete the Linear Park ASH OBJ 18 refers. Stage 4 of the Linear Town Park was opened in October 2019. It is intended to progress the delivery of the skatepark in 2020. It is hoped to commence Part 8 planning procedures in Q3 of 2020 in this regard with the procurement process to take place thereafter.

The development of the remainder of the Linear Park is dependent on financial resources becoming available. In support of this, the Council has sought funding (May 2020) through the Urban Regeneration Development Fund to complete the phases 3, 6 and 7 and extend the Linear Park. Along this new green corridor, a number of new uses are intended to be implemented including:

- Nature trails with footpaths to encourage exploration of ecological zones;
- Informational signage to explain on ecological zones and species present;
- Sheltered spaces for relaxation and viewing opportunities;
- Educational spaces such as beehive hotels and classroom facilities for bug hunting;
- Diverse exercise and fitness trails suitable for all ages;
- Active recreation and play areas; and
- An amphitheatre or gathering space for events.

Meath County Council also published a Public Realm Strategy for Ashbourne in July 2018. This strategy for Ashbourne town will guide the enhancement and vitality of the town as a great place to live, work and visit, and also to facilitate and foster growth in the town. As part of this, it is

proposed to enhance connections between the main town centre area and the green space in the proposed linear park, allowing better access to amenity space throughout the town. This would significantly improve the liveability of Ashbourne and the quality of life for both existing and future residents of the area. This was also included as part of the URDF funding application.

The publication of the aforementioned Strategy further demonstrates the Council's commitment to the provision of public open space in Ashbourne. The improvements to the public realm in tandem with land acquisition for green infrastructure including the public park and linear park, will significantly improve the attractiveness of the area as an investment opportunity.

Furthermore, in recognition of the demand for additional areas of active open space c.6.2 hectares of lands have been identified in the Draft Plan for open space uses adjacent to Donaghmore/Ashbourne GAA club.

With regard to the provision of community facilities in the town, it should be noted that the Draft Development Plan facilitates the development and expansion of social/community facilities and services throughout the County and acknowledges the need for social infrastructure to be provided in tandem with residential and other development. In particular, SOC POL's 4, SOC POL 5 and SOC POL 6 will ensure a holistic approach which incorporates the provision of essential and appropriate facilities, amenities and services, is taken in the design and planning of new residential areas, so as to ensure that viable sustainable communities emerge and grow. These social amenities and services will be provided in this way in Ashbourne and all other settlements.

In conclusion, the provision of adequate and appropriate public open space is a priority for Meath County Council and will continue to consider all options and mechanisms available to improve the its provision in the town. This will be a key consideration in the preparation of the Ashbourne Local Area Plan.

#### **Chief Executive's Recommendation**

Refer to submission no. MH-C5-411 which details the proposed new location for the public park and recommends the inclusion of an objective 'To facilitate the provision of a public park on proximate lands to the southwest of the town centre with appropriate lands to be zoned as part of the Ashbourne Local Area Plan'. Submission MH-C5-411 details the amendments required to the Written Statement in this regard.



Group Submission no.

3

Ashbourne  
Greenspace

<b>Submission No.(s):</b>	MH-C5-630 MH-C5-1103 to MH-C5-1389 inclusive MH-C5-2452
<b>Submission by:</b>	<b>(Please refer to Appendix A for list of corresponding names.)</b>
<b>Submission Theme(s):</b>	Chapter 7 Community Development Strategy and Volume 2 Ashbourne Settlement Strategy
<b>Summary of Submission:</b>	
<ul style="list-style-type: none"> <li>• A large number of repeat submissions raise the issue of green space provision in Ashbourne.</li> <li>• Of particular concern is as follows: <ol style="list-style-type: none"> <li>1. Playgrounds in or near housing estates</li> <li>2. Sports facilities (Ashbourne currently has 21 Sports Clubs, many with facilities at breaking point).</li> <li>3. A community park of adequate size (33.5ha) as per the Future Analytics Report.</li> <li>4. Completion of the Linear Park ( the Linear Park was planned as consisting of seven zones, just zone 4 has been delivered so far.)</li> </ol> </li> </ul> <p>Planning for these facilities should be part of a holistic process that considers playgrounds, sport facilities, local parks, and large community parks to be part of the infrastructure, whose existence or otherwise are key criteria when deciding on applications to build new housing. It is submitted that in the future sports fields, playgrounds, parks etc. will be seen as an intrinsic part of residential development.</p>	
<b>Chief Executive's Response</b>	
<p>The issues raised in these submissions are very similar to those outlined in the many submissions received in relation to the Public Park in Ashbourne. (Groups themed 'Ashbourne Public Park' submissions referred to above. ) Please refer to CE response and recommendation for a detail response in this regard. It is evident from the large volume of submissions received and the concerns expressed that the provision of public open space is a significant concern for the residents of Ashbourne. The Council are fully cognisance of the need to prioritise this issue, identify solutions, particularly in the context of the review of the Ashbourne Local Area Plan.</p>	
<b>Chief Executive's Recommendation</b>	
No change recommended.	

Group Submission no.

4

Millbourne Housing Estate-

Ashbourne-Open Space

<b>Submission No.:</b>	MH-C5-45, 48, 427, 692, 744, MH-C5-2100 to MH-C5-2450 inclusive
<b>Submission by:</b>	<b>(Please refer to Appendix A for list of corresponding names.)</b>
<b>Submission Theme(s):</b>	Chapter 3 Settlement Strategy Chapter 7 Community Building Strategy Volume 2 Ashbourne Written Statement
<b>Summary of Submission:</b>	
<p>Provision of public open space at Millbourne Housing Estate in Ashbourne is a reoccurring theme raised in a number of submissions received. In particular, many of the submissions specifically refer to a parcel of land at Millbourne Housing Estate zoned for residential development i.e. A1 'Existing Residential' in the Draft Development Plan.</p> <p>It is requested that these lands be rezoned from A1 'Existing Residential' to F1 'Open Space' as they are the only area of green space left in the Housing Estate. It is submitted that there is no public green space within a short distance of the estate. It is stated that there is c300 units of houses and apartments with an estimated total population of c. 850 people. It is submitted that the density on the site is 15units per ha higher than that recommended in the Development Plan for self-sustaining growth towns.</p> <p>Reference is made to the planning history on the site referring to previous applications and development plan policies and objectives in particular those in relation to public open space. It is stated that this area was subject to 4 previous planning applications and the residents have been objecting to every proposal put forward. Reference is also made to the ABP Inspector refusal reason relating to lack of open space for residents of Millbourne. (ABP Order PL 17.248899 refers).</p> <p>In summary, the following are the main concerns expressed in relation to the provision of open space in Millbourne:</p> <ul style="list-style-type: none"> <li>• Additional residential is not suitable at this location due to current limitation of school places, traffic flow in the location.</li> <li>• There is a lack of green space available for children in the Millbourne area.</li> <li>• The estate is a large housing estate where no green space has been allocated.</li> <li>• Houses do not have front garden, so children are left to play on the busy roads, which is an accident waiting to happen.</li> <li>• The interactive map is not updated to reflect the laying of new road linking Millbourne Crescent to the Department of Education lands.</li> </ul>	

- Requests that the Council provide the 15 % green space as required by law.
- This small parcel of land is the only remaining green space to have the annual family fun day during the summer months, and the children from the estate use it as recreational space.
- Currently the green area is fenced off and Millbourne residents have no public open space within the estate. The closest social infrastructure to the estate is Donaghmore-Ashbourne GAA and this is for private use.
- The story of the greenspace in Millbourne should not and will not go away until resolved or satisfactorily explained. The resolution seems to be in the hands of MCC. The persistence of this issue is damaging MCC/Community relationships and causing aggravation beyond those directly involved. In the interests of good MCC-Community relations, the Council must explain what happened here.
- A detailed planning history accompanies one of the submissions which outlines a planning history to Millbourne Estate from 2003-2018.
- 1 no. submission also refers to lands which are zoned for F1 open space bordering the subject lands and the industrial estate. It is stated that this land is undevelopable and should be purchased by the Council, linked up with Brindley Park where they have a much larger green space and a park could be developed for the communities.

#### **Chief Executive's Response**

Public open space can have a positive impact on physical and mental well-being as it provides spaces to meet, interact, exercise and relax. It adds to the sense of identity of a neighbourhood, helps create a community spirit, and can improve the image of an area. The quantity of public open space provision within Millbourne Housing Estate is substandard and below the minimum requirements prescribed in the Sustainable Residential Development in Urban Areas, Guidelines for Planning Authorities, DEHLG, (2009), which is fully endorsed in the Draft Plan. (DM POL 8 refers). The current deficiency in terms of public open space provision is acknowledged by the Council but the planning history and background to the subject lands is quite complicated. This was identified in the recent refusal of planning permission for residential development on this undeveloped piece of land within the estate. (Plan. Reg. Ref AA190862 refers) Refusal reason below:

#### **Plan. Reg. Ref. AA190862**

1. *The proposed residential development on the subject site would, in the absence of conveniently located alternative public open space, result in a lack of any significant area of public open space within the permitted residential development (planning register reference number DA03/0422 and subsequent applications) which would seriously injure the residential amenities of existing and future residents of the area and would contravene the stated objectives in the Meath County Development Plan 2013-2019 which seek a minimum rate of public open space of 15 per cent of total site area. The proposed development would, therefore, be contrary to the proper planning and sustainable*

*development of the area and, if permitted, would set an undesirable precedent for other similar-type development in the area.*

It is noted from the submissions received, that this area has been previously utilised by the residents for the purposes of active and passive amenity although it is a fact that the subject lands remain in private ownership and has never been taken in charge by Meath County Council. The sub standard provision of open space within the Millbourne development also appears to be related to the provision of the adjoining proposed Linear Park. Unfortunately, the Linear Park has not sufficiently developed post 2003 when planning was first granted in Millbourne area for residential development with the net effect being that the residents were left devoid of satisfactory levels of public open space. Consequently, the residents of this area of Ashbourne are demanding that Meath County Council do something about the provision of open space on the subject lands together with the further provision of more public open space throughout the rest of the town.

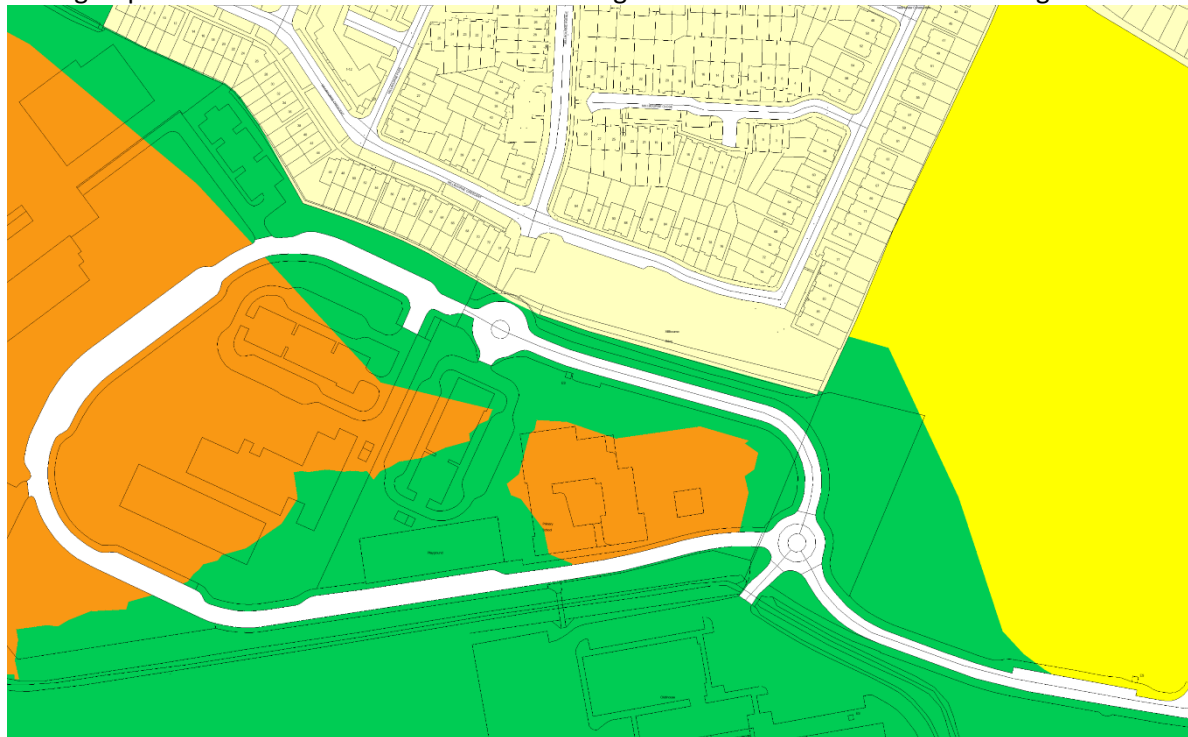
Having regard to the foregoing and cognisant of the previous refusal reasons on this undeveloped piece of land within the Millbourne estate, it is considered appropriate to redress the current imbalance that exists in terms of public open space provision and rezone this land from A1 'Existing Residential' to F1 'Open Space' in accordance with proper planning and sustainable development principals.

#### **Chief Executive's Recommendation**

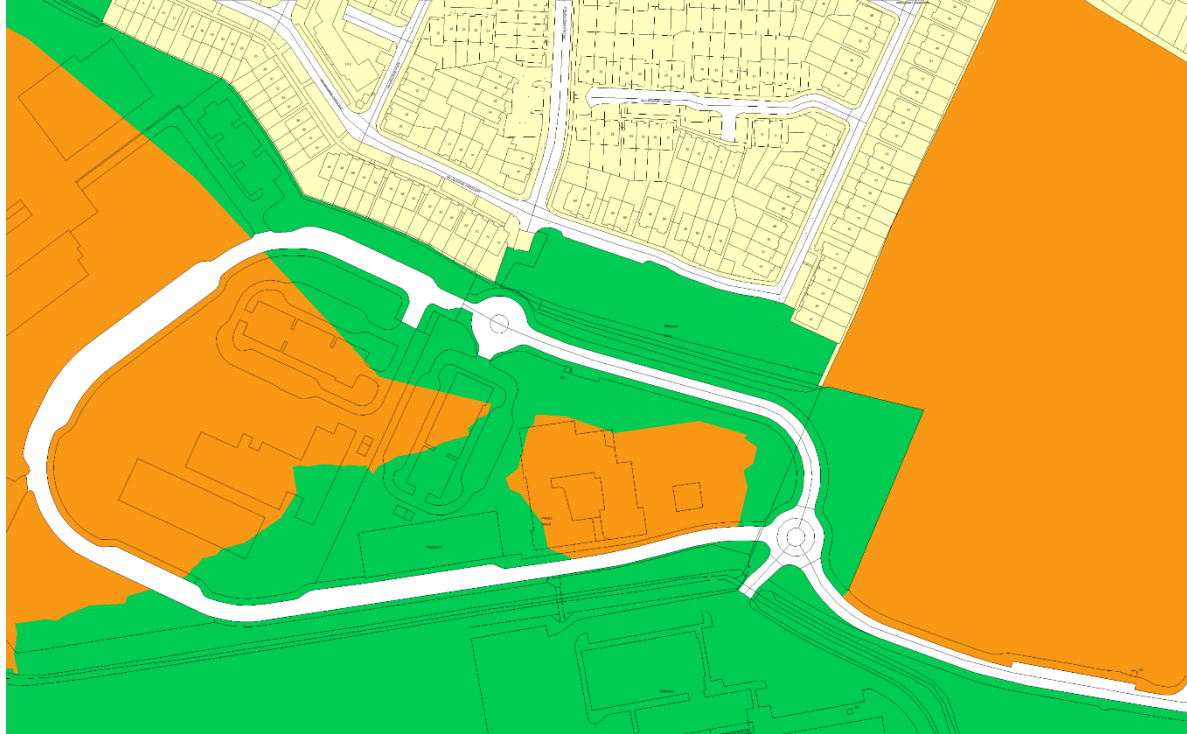
Amend Ashbourne Settlement Maps -Map 1 (a) and Map (1b)

Rezone lands in Millbourne Estate from A1 'Existing Residential' to F1 'Open Space' as per below.

Zoning as per Draft Plan-All lands Zoned A1 'Existing Residential' in Millbourne Housing Estate.



Undeveloped parcel of land rezoned from A1 'Existing Residential' to 'F1 Open Space'



Group Submission no.

5

Zoning of lands adjacent to  
Churchfields-Ashbourne



<b>Submission No.(s):</b>	MH-C5-67, 93, 186, 194, 195, 252, 275, 403, 423, 443, 474, 513, 639
<b>Submission by:</b>	<b>(Please refer to Appendix A for list of corresponding names.)</b>
<b>Submission Theme(s):</b>	Chapter 3 Settlement and Housing Strategy Chapter 7 Community Building Strategy
<b>Summary of Submission:</b>	
<p>A large number of submissions were made in relation to lands which are zoned for residential development in the Draft Plan between Churchfields and Bourne View Housing Developments in Ashbourne.</p> <p>Concern is expressed regarding the development of the subject lands for residential development on the following grounds:</p> <ul style="list-style-type: none"> <li>• Visual impact</li> <li>• Environmental impact – loss of meadow and native hedgerow habitat.</li> <li>• Detrimental to small bird life that comes into the gardens.</li> <li>• Possible housing use, some developments sold to housing agencies, min. 10% social housing.</li> <li>• Loss of recreational space in Churchfields. The first phase of churchfields lacks green area and it makes no sense for the graveyard to be surrounded by development.</li> <li>• Loss of current amenity.</li> <li>• Boundary line problems.</li> <li>• Small site area.</li> <li>• Extra traffic coming into estate and up the current cul-de-sac.</li> <li>• Shadowing on dwellings in the mornings and evening (morning shade in Churchfields and evening shade in Bourne view).</li> <li>• Graveyard is a protected structure and the buffer zone around should to be properly protected.</li> <li>• Light pollution at night.</li> <li>• Noise pollution</li> <li>• A lot of Garden City residents now elderly and vulnerable.</li> <li>• New housing design allows for attic conversions that will overlook all areas, also elevation of site is a concern.</li> <li>• Bourne View on lower level, fear of flood risk.</li> <li>• Rights of way into back gardens (Bourne View).</li> </ul>	

- Future Analytics report stated that Ashbourne community has a deficit of 40 acres.
- New creche in Churchfield being built on large greenspace.
- Lands are unserviced and there are existing service constraints associated with Bourne View.
- Lands were originally intended to be used as an extension to the graveyard of a Parochial House.
- Access is unsuitable as it the only access to the site is through a cul-de-sac in Churchfields.
- There are suitable alternatives to this site and it should be left as it was intended to be, which is an extension to the graveyard or a parochial house and left accessible to the public.
- Negative impact on privacy.
- Continued disruption from construction development.
- The existing deficit of greenspace in Ashbourne and to develop on this space would increase this deficit and negatively impact the surrounding estates.
- There are children in Churchfields that use the green space to play sports and ball games, they only other greenspace they had is where the creche is being built and to develop the site will leave the children with nowhere else to play in the estate.
- Site should be used as a public park with recreational and greenspace for the area. Open greenspace would be of benefit to all as access to the area wouldn't be restricted if appropriate agreements could be made with the current owners, St. Finian's Diocesan Trust.
- If it was turned into a public park/parkland, it could be integrated into Linear Park, and the public green space in Churchfields as phase 2.
- Reference is made to a 9 acre site owned by a 3<sup>rd</sup> party who could swap 3 acres for these thereby facilitating green space in line with new developments.

#### **Chief Executive's Response**

This issue was previously raised and considered part of the NOMS.

The subject lands extend to c.0.8ha in area abutting Killeghland graveyard to the south and between two residential developments 'Churchfields' and 'Bourne View'. The graveyard and its surrounding lands to the north of the site have an area of c.0.93ha.

The Council is presently progressing the development of a Linear Park along the Broadmeadow River to the north of the site. When completed this will be a quality recreational amenity for local residents. This will be the focal point for the provision of future open space in this part of Ashbourne.

The subject site is an infill site which would support the consolidation of development within the built up area of Ashbourne. This is accordance with national policy set out in the NPF whereby National Policy Objective 3c requires at least 30% of all new homes to be delivered within the existing built up footprint of settlements.

As part of any development of these lands an appropriate provision of open space would be required to be provided for future residents.

**Chief Executive's Recommendation**

No change recommended.

# Group Submission no. 6 -Stamullen Development Plan Working Group etc.

<b>Submission No.(s):</b>	MH-C5-108, 128, 131, 142, 148, 152, 161, 185, 187, 199, 208, 218, 219, 279, 295, 306, 310, 318, 329, 331, 358, 371, 395, 400, 406, 412, 419, 424, 433, 442, 448, 450, 455, 456, 457, 462, 469, 471, 472, 481, 489, 509, 510, 521, 530, 538, 615, 679, 689, 695, 698, 703, 708, 794, 813, 1010
<b>Submission by:</b>	<b>(Please refer to Appendix A for list of corresponding names.)</b>
<b>Submission Theme(s):</b>	Chapter 7 Community Building Strategy Chapter 5 Movement Strategy and Stamullen Written Statement
<b>Summary of Submission:</b>	
<ul style="list-style-type: none"> <li>• A submission was made on behalf of the Stamullen Development Plan Working Group which comprises of various clubs/organisations including the Stamullen Community Alert, Stamullen Needs a Playground Committee, 20th Meath Scouts, Stamullen Football Club and several residents.</li> <li>• The main issues raised in this submission relates to provision of community facilities and vehicular and pedestrian connectivity in Stamullen i.e. New playground, scout's facility, and a soccer club facility, youth cafe movement and linkages.</li> <li>• Numerous other submissions by individuals, residents, clubs were made endorsing and restating some or all of the issues raised in the Stamullen Development Plan Working Group Submission. In particular a large volume expressed explicit support for a new scout's den, as well as dedicated football and playground facilities.</li> <li>• While it is stated that the provisions of the draft Plan in relation to Stamullen are welcomed there are a number of objectives relating to the aforementioned issues which require more detailed consideration through either strengthening of current objectives and the addition of new objectives.</li> <li>• Reference is made to the designation of Stamullen as a 'Self-Sustaining Town'. The vision and strategic objectives for the town as set out in Volume 2 of the draft plan where future residential development is limited and with a focus on economic and employment generation and the provision of necessary infrastructure and facilities over the plan period is welcome.</li> <li>• Support is also expressed for the preparation of a new Local Area Plan for the town within the plan period as set out at SH OBJ 5 of the draft plan is particularly welcomed where more specific local issues can be considered.</li> <li>• It is stated that the following strategic issues require more detailed consideration in the draft plan: <ul style="list-style-type: none"> <li><u>1.High Quality Public Open Space Provision including a Children's Playground</u></li> </ul> </li> </ul>	

- i. It is considered that the development of a new high-quality public park in a central location within the town for a combination of recreational uses including a children's playground is a fundamental requirement for the town of this scale. In this regard, the draft plan does not include an explicit objective to provide for a public park for Stamullen.
- ii. Clarification is sought in relation to the location of STA OBJ 16 of the draft plan. It is assumed that the spot objective OBJ1 is the intended location for the proposed playground. Clarification is required in this regard.
- iii. Notwithstanding, it is considered the optimum location for active open space provision including a children's playground is on the town centre lands opposite Goughs corner and not the zoned open space lands located along the River Delvin or on lands east of Stadalt House.
- iv. Based on the above, the following is recommended:

*Delete the following objective:*

- *STA OBJ 16 'To facilitate the delivery of a town playground on land identified east of Stadalt House or alternatively on land zoned as open space along the Delvin River.'* and Replace with the following:
- *STA OBJ 16 'To facilitate the delivery of a high quality central public park integrating a children's playground and other complimentary recreational uses to serve the town'.*

The following new objectives are also proposed in this regard:

- *STA OBJ: Meath County Council shall explore opportunities to address landownership issues with a view to acquiring appropriate lands in collaboration with relevant stakeholders for the development of a high quality central public park to include a children's playground and other appropriate recreational uses within six months of the adoption of this plan.*
- *STA OBJ: Seek the provision of a high quality central public park including a children's playground and other appropriate recreational uses in collaboration with Meath County Council, other relevant stakeholders and the community within two years of the adoption of this plan. Such uses shall be subject to a Landscaping Masterplan in consultation with the local community.*

## 2. Dedicated Scouting Facility and ancillary Outdoor Open Space

- i. It is stated that contrary to the listing of a community centre facility in the table of community facilities set out in Volume 2 of the draft plan for the town, currently, there is no community centre in Stamullen. The majority of existing clubs in the town are facilitated within the existing St. Patrick's GAA clubhouse.
- ii. This scouting organisation currently caters for close to 100 members across beavers, cubs, scouts and ventures offering a much-needed recreational amenity for the town. A dedicated facility and ancillary outdoor open space to accommodate this organisation is considered necessary and is requested. The following objectives are put forward in this regard:

- STA OBJ: To support and facilitate the development of a dedicated Scouting Facility and ancillary outdoor open space on lands adjacent to already established community infrastructure within the town.
- Spot objective OBJ 2 to be included on the zoned 'community infrastructure' lands to the north-west of the existing GAA club for the provision of a dedicated Scouting Facility and ancillary outdoor open space on the relevant land use zoning map for Stamullen.

### 3. Dedicated Soccer Facility including Playing Fields and Clubhouse

- Stamullen requires a dedicated soccer facility with playing fields and clubhouse. Currently the club's activities are facilitated within the existing Gormanston College playing fields. It is noted that Gormanston College is in the process of planning for a new school complex which impacts on the existing playing fields. Notwithstanding this planned redevelopment, the primary objective of Stamullen Football Club is to develop its own dedicated soccer facility to give the club its unique identity, to build on its current success and to continue to provide a much-needed recreational facility for its existing members and to allow for future expansion to cater for new members.
- The following objective is put forward in this regard:
  - STA OBJ: To support and facilitate the development of a dedicated Soccer Facility to include playing fields and a club house to serve the town and to examine the potential for such a facility through the future Local Area Plan for the town.

### 4. Youth Centre/Café

- To cater for an expanding youth population particularly in the early to mid-teen age categories in the town, a 'Youth Centre/Café' is considered a vital amenity to serve the young people of Stamullen.
- To facilitate the primary objective of this committee, the following objective is put forward for inclusion in the Draft Plan.
  - STA OBJ: To Support and facilitate the development of a dedicated Youth Centre/Café within the town.

### 5. New Link Road to M1 Interchange

- The provisions of the draft plan as set out in Chapter 5 Movement Strategy which supports the upgrade of the existing M1 Junction 7 Julianstown/Stamullen and a new vehicular access to Stamullen via the City North Business Campus to the M1 Interchange is welcomed.
- To strengthen the provisions of the draft plan in relation to the provision of a new direct vehicular access to Stamullen via the City North Business Campus to the M1 Interchange, it is requested that the following objective shall be included in Volume 2 the draft plan relating to the town:
  - STA OBJ Meath County Council to examine the feasibility of a new vehicular access to Stamullen via the City North Business Campus to the M1 Interchange as part of the future Local Area Plan for the town through a traffic impact assessment, in collaboration with relevant stakeholders.

### 6. Enhanced Pedestrian Connectivity and Public Realm Enhancement

- i. The priority provisions set out in the draft plan in Volume 2 for Stamullen in terms of improving pedestrian and cycle facilities within the town and between the M1 Business Park and Gormanstown is welcomed.
- ii. It is considered that there is an inadequate level of footpath infrastructure in the town, and that there is a physical disconnect between the various sections of the town. Options to improve pedestrian linkages within and around the town should be explored and developed through a more focused and coordinated approach.
- iii. A Public Realm Plan is considered necessary in this regard to seek to address existing deficiencies in the pedestrian environment and to promote proposals for environmental enhancements. The following objective is put forward:
  - STA OBJ To prepare a Public Realm Plan as part of the future Local Area Plan for the town to include a suite of environmental measures to improve the physical fabric of the town including the identification of improved pedestrian linkages and connectivity within and adjoining the town.

In conclusion, the working group commends Meath County Council on the preparation of the draft plan and welcomes the opportunity for this submission to be adequately considered in the draft plan process.

#### **Chief Executive's Response**

The Council recognises that the provision of good quality community facilities in both existing and developing areas is a key element in the development of sustainable communities across the County. It is a priority for the development of Stamullen to improve community facilities and services to meet the needs of the growing population.

As part of the preparation of the Draft Plan, the Council has engaged with various sections of the Council in addition to external agencies to identify the community infrastructural needs required to assist in the creation of a more balanced and sustainable community. Through this process, it is considered that this Plan has identified sufficient social and community lands to meet the needs of the population during the life of this Plan.

However, it should be noted that as part of the Local Area Plan process, the requirement for additional facilities can and will be examined in greater detail. It is considered that the provision of additional recreational and sports facilities and their connectivity with established and planned facilities are priorities for the Stamullen LAP.

#### 1.High Quality Public Open Space Provision including a Children's Playground

The Draft Plan identifies, as a priority, the development of a walkway along the Delvin River and the development of these lands to provide for both active and passive open space, in order to provide much needed amenity in the town. In addition, the Written Statement for Stamullen supports the provision of additional social and community infrastructure including a playground, with 2 potential locations identified. i.e.to the east of Stadlt House or alternatively on lands along the Delvin River (Specific objectives STA OBJ 16 and OBJ 1 ). Whilst the issues raised in the submissions in relation to the preferred location of the playground, are noted, it is considered that a determination on the exact location of the playground is a specific local issue more relevant to the preparation of the Stamullen Local Area Plan, where it can be examined in greater detail. It is noteworthy also, that the draft LAP will be subject to public consultation where such specific issues can be raised.



## 2. Dedicated Scouting Facility and ancillary Outdoor Open Space and;

## 3. Dedicated Soccer Facility including Playing Fields and Clubhouse

In response to items no. 2 and 3 above, Meath County Council recognises the important role played by the local Scout and Soccer Clubs in Stamullen and is committed to future engagement and co-operation with all clubs in the community. This will take place as part of the preparation of the Local Area Plan and through the Community Section of the Council.

Section 7.7.6 of the Draft Plan 'Existing Sport and Leisure Facilities' includes objectives to support local sports, community groups and other groups in the provision and development of outdoor and indoor sporting and community facilities throughout the County and also through the reservation of suitable land and provision of funding where appropriate. (SOC POL 32 SOC POL 33, SOC POL 34, SOC POL 35, SOC POL 36, SOC POL 37, SOC OBJ 7, SOC OBJ 9 are relevant in this regard).

Community Facilities, Sports Facilities and playing pitches are permitted uses in principle on G1 'Community Infrastructure' and F1 'Open Space' zoning categories. Regarding community and open space lands, it is considered that the Draft Plan has identified sufficient lands in Stamullen to meet the anticipated growth and infrastructural requirements during the life of the Plan.

It is noted that the lands referred to in relation to the Scouts facility are subject to zoning G1 Community Use zoning and therefore such a use is permissible in principle. The provision of a dedicated building is best dealt with through the Development Management process. No change in zoning is necessary. However, the identification of specific sites or allocation of premises for named clubs is beyond the scope of the County Development Plan but could be considered further in a Local Area Plan process.

Furthermore, the acquisition of lands and allocation of public open space including pitches is also outside the strategic land use function of the County Development Plan. However, the Council through the Community Department will work with all groups in providing any assistance/guidance in relation to the sourcing sites for community amenities. Information on all available sources of funding to assist the groups with delivering their project can also be provided.

## 4. Youth Centre/Café

The Draft Development Plan already provides policy support for youth clubs/cafes in the County. SOC OBJ 1 below refers:

SOC OBJ 1: To assist in the provision of community and resource centres and youth clubs/cafes and other facilities for younger people by the identification and reservation of suitably located sites, including sites within the landbanks of the Local Authorities and by assisting in the provision of finance, where possible.

Furthermore, it is considered that youth cafes and other facilities for younger persons could be incorporated into community centres/facilities which are provided for under SOC POL 32. It is considered unnecessary to provide a specific designation in this regard.

## 5. New Link Road to M1 Interchange

Support for the new vehicular access to Stamullen via the City North Business Campus is noted and welcomed.

The development of a link road connecting Stamullen Village to the City North Business Park has been supported by Meath County Council and it is considered that the Draft Plan contains sufficient policies and objectives to support the provision of a road link which would improve connectivity and permeability in Stamullen and create a more sustainable settlement – see STA OBJ 9 of the Stamullen Written Statement. The objective of the plan to advance the possible upgrading of M1 Junction 7 to improve its capacity inclusive of the facilitation of vehicular access to / from Stamullen via the City North Business Campus to the M1 Interchange is reaffirmed in the Draft Plan.

The road in question is to be delivered by private developers. The developer will have to take their own view of the Board's decision and the comments included in the Inspector's report and any future application will have to address the reasons for refusal given by An Bord Pleanála for the link road (MCC Plan. Reg. Ref AA170598; ABP Ref 301284-18).

We note that the Board was *'not satisfied that the proposed development would not adversely affect the strategic role and function of the national road network. The proposed development would, therefore, conflict with policies to protect investment in national roads, as set out in the "Spatial Planning and National Roads Guidelines for Planning Authorities" issued by the Department of the Environment, Community and Local Government in January, 2012'.* In the Inspector's Report, it states that the Inspector had read the applicant's Traffic Impact Assessment (TIA) and in general accepted the overall findings. However, it was also noted that the TIA assumed that the proposed link road will not alter volumes of traffic joining or leaving the motorway at Junction 7 and the Inspector considered that this scenario is unlikely. The Inspector went on to say that *'The assessment, therefore, has no regard for the likely indirect effects of the connection of Stamullen to the motorway i.e. how it would affect traffic movements in the area to the west of Stamullen and potentially other junctions and flow patterns on the M1. Given the strategic economic importance of the M1 linking the capital City to Belfast, the very clear policies at national and regional level which seek to safeguard the carrying capacity of the national road network, such an omission is significant. In addition to the above, in the absence of a wider assessment of the implications of the development for traffic flows in the region, the development could result in unforeseen traffic flows through the residential lands to the south of the site (including HGVs) and the junction of this estate road with Gormanstown Road, to the detriment of residential amenity and amenity of the village of Stamullen.'* There is however scope within the above decision to facilitate and develop a revised road scheme that will meet the criteria outlined and ensuring that it complies with relevant organisations such as TII.

#### 6. Enhanced Pedestrian Connectivity and Public Realm Enhancement

Support for the pedestrian and cycling provisions is noted and welcomed.

The improvement of pedestrian linkages within and around the town is adequately addressed in STA OBJ 11 which propose to *'To facilitate the provision of pedestrian linkages from Silverstream Road to Cockhill Road through established residential areas'*. This aims create to direct linkages to each end of the town without the need to walk directly through the Village.

The request to prepare a Public Realm Plan for Stamullen will be considered as part of the LAP process.

<b>Chief Executive's Recommendation</b>
No change recommended.

Group Submission no.

7 Education Provision-Trim

<b>Submission No's.:</b>	MH-C5-55, 74, 101, 147, 149, 151, 156,170,171, 182, 190, 192, 196, 197, 202, 204, 206, 215, 220, 288, 309, 312, 426, 445, 494, 554, 563, 582
<b>Submission by:</b>	<b>(Please refer to Appendix A for list of corresponding names.)</b>
<b>Submission Theme(s):</b>	Chapter 7 Community Building Strategy
<b>Summary of Submission:</b>	
<p>Many submissions received highlight issues in relation to schools and education provision in Trim. Reoccurring themes in the submissions received include the following:</p> <ul style="list-style-type: none"> <li>• A demand for primary and post primary facilities/sites.</li> <li>• Capacity constraints at both secondary schools.</li> <li>• The need for a permanent location for Trim Educate Together primary school. Reference is made to the unsuitability of the old St. Mary's National School in this regard.</li> <li>• A requirement for new, modern buildings with appropriate facilities for educational facilities.</li> <li>• Educational zoning of land in Trim to provide a long term solution for the future of schools in Trim is necessary.</li> <li>• Specific reference is made the G1 lands on the R154 Road which were in part previously identified for educational provision. Numerous submissions request that the Education Reservation status i.e. Possible Future Education site is reinstated.</li> <li>• It is submitted that removing the education reservation status places significant further barriers to identifying future school sites in Trim, a town that is growing year on year and has already had future housing development approved but no accompanying approval for development of educational facilities.</li> </ul>	
<b>Chief Executive's Response</b>	
<p>The provision of new schools is primarily the responsibility of the Department of Education and Skills. The Development Plan makes provision for additional educational facilities in accordance with 'A Code of Practice on the Provision of Schools and the Planning System' following detailed discussions and engagement with the Department of Education and Skills, in particular having regard to their school planning projections and the educational infrastructure needs within the Development Plan.</p> <p>A detailed submission was received from the Department of Education and Skills (DoES) outlining issues in relation to education provision in the County. With regard to Trim, the DoES identified additional requirements in terms of educational provision for Trim. The following is of particular relevance in this regard:</p> <ul style="list-style-type: none"> <li>• <i>The Department currently has plans to deliver additional capacity for Trim ETNS at a property in the town centre, at Boyne Community School at its current location and at Scoil Mhuire on a new site, yet to be selected.</i></li> <li>• <i>In particular, the DoES would welcome a specific objective for the provision of post primary and primary school accommodation on a Community Infrastructure site in Trim, to meet the current requirement for Scoil Mhuire and potential future primary school</i></li> </ul>	

*accommodation requirements. A site of circa 15 acres should be identified for a campus solution, unless off site facilities such as a playing pitch are proximate.*

Following consultation with the DoES and having regard to the issues raised in their submission, it is considered appropriate to include a specific objective on lands identified for G1 'Community Infrastructure Use' on the Dublin Road to reserve 15 acres for the provision of primary and post primary educational facilities to meet the current and future education needs of Trim over the lifetime of the Development Plan.

Meath County Council will continue to liaise with the Department of Education and Skills with regard to the provision of school places throughout Trim and the County. This consultation will inform the review of the new Trim Local Area Plan. If further sites are considered necessary, the Council will work with the Department of Education and Skills and other bodies to ensure the development of schools at the optimum locations throughout the town.

#### **Chief Executive's Recommendation**

Please refer to submission no. 824 (Chapter 7 Community Building Strategy Submissions) from the Department of Education and Skills (in particular points no 4 and 5) for the CE's Recommendation.

# Group Submission no.

8 - Gormanston Written Statement

<b>Submission No.:</b>	MH-C5-68, 70, 71, 81, 82, 290, 291, 294, 296, 313, 320, 321, 324, 326, 328, 502, 531, 539, 579, 1017 MH-C5-1022 to MH-C5-1099 inclusive MH-C5-1750 to MH-C5-1754 inclusive
<b>Submitted by:</b>	<b>(Please refer to Appendix A for list of corresponding names.)</b>
<b>Submission Theme(s):</b>	Gormanston Objectives
<b>Summary of Submission:</b>	
<p>This submission has been submitted as a petition in relation to specific Gormanston objectives.</p> <p>The submissions welcomes the intention from the CDP to preserve the rural nature and environment of Gormanston in the draft plan by limiting the land available for development. It is noted that the submission confirms the CDP has correctly identified that Gormanston, as a rural village, has limited infrastructure to support existing housing.</p> <p><b>GOR OBJ 4</b></p> <p>It is suggested that this objective is strengthened to read “<del>To seek</del> To improve linkages between Gormanston village and railway station by providing new paths/footpaths with appropriate street lighting and crossings at key locations on the R132, in conjunction with relevant stakeholder”. In an age of climate change and promoting healthy living, MCC should be serious and fully supportive of this objective.</p> <p><b>GOR OBJ 5</b></p> <p>It is suggested that this objective be strengthened to read “To introduce traffic calming measures along the main village road and at the main gateways to improve pedestrian safety”, <del>subject to available resources</del>. The reason for removing ‘subject to available resources’ that something must be done within the timeframe of this plan to address the requirement to reduce the speed vehicles travel at in close proximity to the school, playing fields and houses. Preventative measures such as traffic calming will improve road safety for all which must be a core value underpinning this plan.</p> <p><b>GOR OBJ 14</b></p> <p>It is suggested that this objective be strengthened to read. “<del>To seek</del> To maintain and improve existing footpaths, grass verges and preserve existing trees, <del>and</del> hedgerows, landscape and biodiversity in order to maintain a consistent appearance throughout the rural village. “to seek to improve” doesn’t convey any real commitment to achieving the objective. The planners have correctly identified the importance of the landscape and in particular Cromwell’s Avenue and the landholding along Delvin River.</p>	
<b>Chief Executive’s Response</b>	
The vision for Gormanston is to preserve and conserve the existing character of Gormanston village by the consolidation and strengthening of the defined village centre.	



Furthermore, it is the Council's aim to recognise the importance of conserving and enhancing the quality of the villages built and natural environment and heritage, while catering for the needs of all sections of the local community.

In relation to the submission which requests the removal of terminology such as "To seek to improve" and "subject to available resources" in respect of the identified objectives as referenced above.

It should be noted that the terminology used is proposed in order to outline that such objectives will be delivered through collaboration with various stakeholders and subject to other Council priorities. The objectives identified are a priority of the Council and it's the Council's aim to deliver same within the lifetime of this Plan.

**Chief Executive's Recommendation**

No change recommended.

# Group Submission no.

## 9 -Miscellaneous Issues

<b>Submission No.:</b>	MH-C5-150, MH-C5-258, MH-C5-642 MH-C5-748, MH-C5-795, MH-C5-931, MH-C5-933, MH-C5-990, MH-C5-991 MH-C5-1390 to MH-C5-1426 inclusive
<b>Submitted by:</b>	<b>(Please refer to Appendix A for list of corresponding names.)</b>
<b>Submission Theme(s):</b>	Chapter 1 - Introduction, Chapter 2 -Core Strategy, Chapter 3 – Settlement and Housing Strategy, Chapter 4 – Economic and Employment Strategy, Chapter 5 – Movement Strategy, Chapter 6 Infrastructure, Chapter 7 - Community Building Strategy, Chapter 8 - Cultural and Natural Heritage Strategy, Chapter 9 – Rural Development Strategy, Chapter 10 Climate Change Strategy, Chapter 11 – Development Management Standards and Land Use Zoning Objectives.
<b>Summary of Submission:</b>	
<p><b><u>Chapter 1 – Intro</u></b></p> <ul style="list-style-type: none"> <li>• Meaningful public participation – onus to implement submissions</li> <li>• Ireland and EU have signed up to numerous international conventions which guarantee public participation (The Aarhus Convention)</li> <li>• Most concerned that this is not merely a box ticking exercise and that these submissions must be fully considered – or the Council will be liable to Judicial Review</li> <li>• SEA – note that the CDP was subject to an SEA;</li> <li>• However, the above sentiment rings shallow as it is considered that there has been little or no enforcement of planning permissions when they are granted to quarry operators and worse still that there has been little or no enforcement of unauthorised quarries either. This compares to other sectors of society who will likely have a representative from the County Council out to inspect them for the smallest of planning alleged infringements. The environmental and social impacts of poorly regulated quarries have been enormous and will be there forever</li> </ul> <p><b><u>Chapter 2 – Core Strategy</u></b></p> <ul style="list-style-type: none"> <li>• <b>National &amp; Regional Policy</b> - note in section 2.3.1 states that; Securing compact and sustainable growth is an important element of the growth strategy. This will be achieved by concentrating on delivering growth within the existing built up footprint of settlements by focusing on the re-use of previously developed ‘brownfield’ land, infill sites and the re-use and redevelopment of existing sites and buildings.</li> <li>• <b>Population:</b> note that the current population is 195,044 (2016 census) and that this is estimated to increase by 3,246 per annum with an estimated 221,250 by 2026. Submission commends the Council on its presentation of the population statistics.</li> </ul>	

### **Chapter 3 – Settlement & Housing Strategy**

note the following paragraphs on page 74, which outline two forms of accommodation and references 'Rebuilding Ireland'

- *'Build to Rent' developments are large-scale developments that have the potential to deliver residential accommodation at a pace and scale significantly greater than that of the more traditional developers.*
- *'Shared accommodation or 'Co-Living' consists of professionally managed rental accommodation where individual rooms are rented within an overall development that includes access to shared or communal facilities and amenities*
- It is submitted that a specific policy in relation to sound insulation for high density schemes is required to prevent unwelcome noise from travelling between units.
- Vulture Funds: while the rental market is essential, they are aware that Build to Rent developments have been promoted by so called vulture. hedge funds – this is not acceptable.

Build to Rent Schemes;

- Most of the accommodation is for single people;
- Meanwhile, what about Irish families growing up in hotel bedrooms;
- These developments are not family friendly;
- Moreover, the rental income is flowing out of the country;
- This is ludicrous and a mirror of what Ireland fought so hard to rid itself of in the 1800s
- Irish people should be afforded the dignity of owning their own home

It is submitted that a policy specifically proscribing this form of 'investor' / 'landlord' from building anywhere in the County of Meath. It might read like: *To support the common good, it shall be the policy of Math County Council to promote the private buy to rent sector in preference to investments funds.*

It is submitted that a specific policy be inserted into the County Development Plan proscribing this type of development in County Meath by reason of social issues and also incompatibility with Meath's heritage status. It might read like: *To ensure that living standards are upheld in the county it shall be the policy of the County Council to prohibit the development of co-living accommodation.*

it is submitted that a policy be inserted along the lines of: *-It shall be the policy of Meath County Council that all buildings are adequately insulated to prevent sound from travelling beyond their living area so that others can peacefully enjoy their living space in comfort*

## **Rural Housing Policy**

While we support the County Council in its endeavours to restrict housing in rural areas, there are occasions where it will be appropriate to grant such permissions. To this end, we note 'Table 9.1 (a) Schedule of Local Need' on page 312 of the draft county development plan. We further note that a figure of a minimum of 25 acres is mentioned as a minimum acreage before the council would consider a grant of planning. This would appear to be very arbitrary and fails to take account of horticultural industry norms, which typically require far less land. For example; 5 acres of ground can accommodate quite a sizable nursery supporting the employment of many people. Likewise there will be other intensive rural enterprises, which will not require anything like 25 acres of ground. It is therefore recommended that this arbitrary restriction be reviewed with a view to accommodating the type of industry alluded to above.

## **Chapter 4 – Economy & Social Strategy**

Data Centres should not be encouraged for two reasons;

**1. Electricity Usage:** They use a massive amount of electricity; we are trying to reduce CO2 emissions on the one hand while on the other encouraging business that are resource intensive. We enclose article published by the Guardian 6th January 2020 for your information. Why Irish data centre boom is complicating climate efforts; published 6th January 2020, The Guardian [https:// www.theguardian.com/environment/2020/jan/06/why-irish-data-centre-boom-complicating-climate-efforts](https://www.theguardian.com/environment/2020/jan/06/why-irish-data-centre-boom-complicating-climate-efforts)

**2. Security:** We understand from information gleaned from security analysis that having so many datacentres in Ireland makes us a highly vulnerable target for terrorism. We also understand that there may well be agents from rogue states already on the ground here in Ireland waiting to be mobilised. We enclose article published by the Irish Times of the 27th December 2019 for your information. Cyber attack on Irish data centres would badly hit economy, report warns; published 27th December 2019, The Irish Times [https:// www.irishtimes.com/news/crime-and-law/cyber-attack-on-irish-data-centres-would-badly-hit-economy-report-warns-1.412475330](https://www.irishtimes.com/news/crime-and-law/cyber-attack-on-irish-data-centres-would-badly-hit-economy-report-warns-1.412475330) .We therefore STRONGLY oppose this flawed policy, which is counter productive in terms of the County's reliance on energy and also exposes Meath and its citizens to an unnecessary security risks of a grave kind.

## **Movement Strategy**

- Need to move away from roads to rail and other forms of public transport. Constructing motorways merely encourages this type of car dependant urban sprawl;
- Motorways give rise to significant noise and disturbance
- Disagreement with the proposal to support the planned motorway to the TII

### **Infrastructure Strategy**

Ground water: There is an absence of policy regarding adequate protection of groundwater aquifer in the case of water abstraction and water table drawdown by the extractive industry.

### **DEEP BORE GEOTHERMAL**

This is essentially ‘free’ energy contained within the earth’s crust. Briefly, it entails boring 2 boreholes to depths of between 2 and 3 miles. It is dependent on the existence of a particular type of rock to conduct water from A to B.

Advantages;

- No visually obtrusive issues
- No property devaluation
- No health issues
- No fluctuations in the availability of energy
- No spinning reserves
- No waste of finite natural resources#
- Numerous suitable geological bedrock areas in Ireland<sup>4</sup>

## **Chapter 9 Rural Development Strategy**

### **9.5.1 Local Context**

It is submitted that the level of rural residential development should be such that it does not have a negative impact on rural enterprises such as farming and on farm agricultural related enterprises. The needs of “quarrying and extractive industries and newly emerging technological industries on appropriately zoned lands” should not take precedence over the need for housing in a rural area. This is especially true as extractive industries do more harm to the environment, aquifers and the roadways than any local housing which is sensitively designed to fit in with a rural environment and uses modern waste treatment technologies.

### ***Extractive Industry and Building Materials***

- Note the policy provisions for the extractive industry. The Council will be aware that there has been significant unauthorised development in this sector. This continues to remain very problematic. It is submitted therefore that a policy be inserted which prevents further grants of planning issuing in circumstances where there has been unauthorised development;
- Procurement of products or services from applicants who operate unauthorised developments;
- Planning authority taking a position on unauthorised developments;
- Conflicts of interest;
- Quarry density in given area;
- A policy curtailing overdevelopment of quarries in a given area would be helpful to promote sustainable planning;
- Constant extraction of finite resources such as minerals is not sustainable in the long term;
- Villages; in general villages in Ireland have had housing developments appended to them in brash zoning and poor design;
- Land banking; in recent years we have credible evidence of large amounts of agricultural land being bought up by large-scale quarry operators for possible future exploitation. This is having the effect of outbidding legitimate farmers and depriving them of the ability to acquire land affordability;
- Eskers; in the space of a couple of generations, much of Irelands important eskers have fallen victim to the extractive industry.
- It is submitted that a policy be drafted to help protect the counties remaining eskers
- Regulation of Quarries; there has been a complete lack of regulation of the quarry sector with far too much left up to discretion and human error;

Suggested limits for quarry developments;

- a) Maximum depth to which quarrying is permitted in the county is: to remain 1.5 meters above the water table (to protect groundwater aquifer together with private wells and water supply
- b) .Maximum duration of permission for any quarry development shall be 15 years in the case of a green field site with a maximum of 6 years for any subsequent applications for extensions.
- c) Set back of a quarry development from a public road shall be a minimum of 60 meters (in the interest of health and safety.
- d) Set back of a quarry development from a salmonid watercourse or river containing trout shall be a minimum of 40 meters.
- e) There shall be a maximum permitted noise level of 50 dB(A).
- f) There shall be a maximum permitted dust level of 130mg/m<sup>2</sup>/day,g.
- g) There shall be a maximum permitted vibration level not exceed a peak particle velocity of 12 mm/sec PPV, and air over-pressure values shall not exceed 125 dB (Lin) max peak, when measured at any noise sensitive location within the surrounding area
- h) There shall be a maximum of one blast per month in any one area irrespective of the number of quarries in that area.

- i) All quarries shall be monitored for Dust, Air Overpressure, Water quality, Wells, etc by the authority or an independent 3rd party and conducted at a minimum of by monthly intervals.
- j) Truck movements shall be monitored at all quarries so that an exact log of truck movements is maintained.

### **Chapter 10 Climate Change**

This submission provides a comprehensive review of Chapter 10 Climate Action of the Draft Plan. A summary of the key points raised are outlined below:

1. The difficulty with the emissions figures for County Meath, is that they are a derivative of an overall national figure and apportioned based on the CSO figures, they are not figures based on any in-situ research or developing a baseline from the actual emissions under any of the sectoral headings, they are also 2017 figures and emissions should not relate to baseline figures and % changes rather actual live data.

2. MCC prepared a Draft Climate Change Adaptation Strategy, which is still not a finalized document for aligned with the LECP which was developed ahead of the Climate Change Adaptation Strategy.

3. The most immediate potential effects of Climate Change will be an increase in the frequency and severity of flooding events from rainfall this should be monitored and must also be considered in the CDP. Severe rainfall events as a result of Climate Change could result in extreme flood events in Meath, which will adversely impact upon town's in Meath leading to water shortages, residential flooding and disruption to farmland, and infrastructure. Towns and villages along the coast will become increasingly vulnerable to rises in the sea level and coastal erosion and inland areas to flooding and fire.

4. The Author outlines the need to align the Draft CDP with the national commitments on climate change mitigation and adaptation, as well as relevant sectoral, regional and local adaptation plans.

5. The submission recommends that a new study be commissioned to accurately assess the sectoral emissions produced in County Meath in an effort to realistically address the level of emissions and put measures in place to mitigate.

6. Movement Policies and Objectives 1-39 - The Author does not support the overall objectives noted addressing Climate Change Mitigation through Movement Policy on Transport. All policies and objectives are infrastructure related and do not form a cohesive plan to address the emissions produced by transport through local policy. Only one MOV POL 16: To support the



provision of electricity charging infrastructure for electrical vehicles both on street and in new developments in accordance with car parking standards and best practice addresses Mitigation of Climate Change there is no policy referring to electrification of the transport fleet in County Meath, there is no reference to greening the public vehicle fleet.

7. The overriding objective in each policy, which the Author would add to each policy objective is that the policy should have a net effect of reduction in GHG emissions at Sectoral Level i.e. Transport and be carbon proofed.

8. The submission requests a policy addressing land management for example, Meath CoCo will promote and enforce sustainable land management practices to maintain a healthy agricultural sector.

9. Suggestion of further objectives to avoid environmental damage to soil and water and to decrease the production of GHGs.

10. Planning Guidelines should make GHG emissions reduction the priority superseding non-essential requirements to ensure that the planning process does not prevent people from providing renewable energy for themselves and their locality within the legal requirements.

11. The submission supports the INF Policies 34-48 with caveat on large scale developments within the region that they should not be permitted unless providing for the community where they are situated and the surrounding locality, they should not have a negative impact upon anything with architectural, cultural or environmental value or on the communities surrounding them.

12. Support is given for Objectives 23- 32 listed in 10.6.1 whilst the Author would add;

- Pol – to develop a Rapid Response Programme for Flood Situations on the Transport Network and have it publicly available
- Pol - businesses and communities will be provided with information on potential flood areas from the CFRAM studies
- Obj - local plans may be put in place through community groups for flood management – this is done in other countries successfully for fire/eruptions.
- Pol – the transport fleet for emergency services and public utility will be climate proof with regard to emissions and safety

13. INF POL 19, 20, 24, 25, 26, 27, 29 & 30 should be amalgamated and should be located under another heading or located in the following chapter on Water Resource Management or Flooding – it is not appropriate under Energy or Waste Infrastructure though is extremely important – we support all POLs listed.

14. Suggested Policy: POL 1: Meath Co Co will ensure that locally and regionally important groundwater sources aquifers are protected under the County Development Plan and included in the map appendices indicating their position and that of any industrially licensed or permitted facility positioned above these resources.

15. INF OBJ 21: Author suggest rewording of this policy ‘To prevent all new development within floodplains other than development which satisfies the justification test, as outlined in the Planning System and Flood Risk Management Guidelines 2009 for Planning Authorities (or any updated guidelines) and any emergency measures required to mitigate against Climate Change.’

16. Author suggests adding a policy to provide an irrigation management and water storage plan for the region to provide for extreme flood and drought situations. Author suggests adding a policy ‘to provide a Soil Management plan for County Meath, which identifies areas of concern and highlights areas for protection on farm, not those already protected by other national or regional plans.’

17. Author suggests adding a policy to provide a Fire Risk Assessment & Management Plan for the County - including forestry and arable land.

18. Author suggests adding a policy ‘to encourage the production of locally produced food, for consumption locally.

19. HER OBJ 4: This policy is supported with the recommendation of an addition to encourage the management and maintenance of the County’s archaeological heritage, including historic burial grounds, in accordance with best conservation practice that considers the impact of climate change. Author would add ‘burial grounds and their siting below ground may need revision to mitigate against of flood and climate change’

21. MOV OBJ 55 and MOV OBJ 56 should be located in the transport section

## **Chapter 11 Development Management**

## Build to Rent & Shared Accommodation

- Share accommodation is socially undesirable and unsuited to Co. Meath. All references in the county development plan to shared accommodation should therefore be removed;
- Roll-Down Shutter Blinds: Removal of DM OBJ100 – unclear why this is proposed in an age of increasing crime;
- Public art industrial / warehousing; Removal of DM OBJ 119

## Views and Prospects, archaeological Heritage and Landscape Conservation Area

- South Meath is poorly represented in the table of protected views and a list of additions is proposed hereunder. Furthermore, the protected views are poorly described with reference only to local names and with no reference to road grid references or the new GPS signage currently being rolled out. Request for the following views to be added;
  - Moate Hill situate north of Castletown road near Rathmolyon;
  - Galtrim Hills;
  - Doreys Forge, Moynalvey;
  - Castletown Hills;
  - Clonard;
  - Coole;
  - Royal Canal (walks either side of docks in Longwood);
  - Ardanew;
  - Summerhill to Kilcock road;
  - Rathcore Hill;
  - Ferrns Lough;
  - Boyne Aqueduct;
  - Road between Boardsmill and Kildalkey;
  - Gallows Hill, Rathmolyon;
  - Trammon: adjacent to Greens Cross;
  - Kilballporter
- A list of National Monuments and Registered Historic Monuments are contained in Appendix no. 9. Archaeological structures may, in some situations, also be considered as architectural heritage and therefore may appear on both the Record of Monuments and Places (RMP) and the Record of Protected Structures (RPS). The following should also be included;
  - Burial Ground, Trammon, Rathmolyon (site code ME042-033 & 034)
  - The Moate Hill, Rathmolyon;
  - Castletown Hills;
  - Rathcore Hills;
  - Royal Canal, Longwood;
  - St Gorman's Well, known locally as 'Hotwell'

## Chief Executive's Response

## **Chapter 2 – Core Strategy**

The comments on the Core Strategy are noted and welcomed. It should be noted that as part of the response to the OPR (MH-C5-816) an updated Table 2.11 has been provided as well as there being associated changes to the Core Strategy. No further changes considered necessary.

## **Chapter 3 - Settlement Strategy**

It is noted that both 'Build to Rent' and 'Shared Accommodation' are outlined in Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities 2018. It is required under planning legislation that Government Guidelines be included in the preparation of the Draft Plan. As such, the inclusion of these types of accommodation is consistent with planning legislation and it would not be possible to provide for a policy/objective as requested.

With regard to insulation, it should be noted that the standards relating to matters such as this are addressed as part of national building regulations and it is not possible to provide an objective or policy requiring the provision of a certain quantity or quality as part of the Development Plan. Furthermore, it would not be possible as part of planning legislation to enforce such a policy/objective and as such there is no amendment required to the Draft Plan in this regard.

## **Chapter 4 – Data Centres**

As noted in Section 4.8 of the Draft Plan, Meath County Council have worked closely with industry leaders to identify appropriate zoning and potential locations in County Meath for the development of Data Centres. It is noted as part of Section 4.8 that Meath County Council will "continue to work with industry leaders and stakeholders in the identification of suitable sites for data centre development."

In relation to the environmental concerns relating to data centres, Chapter 10 of the Draft Plan relates to Climate Change and throughout the plan preparation process, WSP Consultants have provided guidance and advice on policies in relation to climate change effects. In this regard, it is considered that these matters have been adequately considered. The 'Government Statement on The Role of Data Centre's in Ireland's Enterprise Strategy' was prepared by the Department of Business, Enterprise and Innovation and published in June 2018. It was considered that the planned approach outlined in this document allows Ireland to optimize the benefits that these strategically important data centre investments can bring to our society.

Furthermore, it is noted as part of the Planning and Development (Amendment) Act 2018 that it is intended to include Data Centres of a certain scale as Strategic Infrastructure Development. As such, it is considered that the above requested changes are not necessary given that are contrary to national policy and any environmental impacts will be considered on a case-by-case basis as applications are brought forward to Meath County Council or An Bord Pleanála.

Finally, matters relating to security and terrorism are not matters that can be appropriately considered as part of a development plan process and are matters for national government. In this regard, the government statement on data centres is clear in supporting their delivery whilst balancing the potential climate change impacts. The proposed approach outlined in the Draft Plan is considered acceptable.

### **Chapter 5 Movement Strategy**

The Council is strongly committed to the promotion of sustainable means of travel, including public bus services and the encouragement of modal change from private car to such sustainable means of travel. However, the Council is not directly responsible for public transport provision. The Department of Transport and the NTA are the principal agents for delivery of transport policy and development in the Greater Dublin Area. Other agencies involved in the provision and improvement of public transport include Iarnród Éireann, the Railway Procurement Agency, Bus Éireann etc. Whilst the Council does not have a direct role in the provision of public transport services, it is actively promoting and facilitating the improvement of both bus and rail services both within and from County Meath and is committed to working in conjunction with all transport providers and stakeholders in terms of the delivery of a reliable, accessible and integrated transport network that supports the effective functioning of the county.

### **Chapter 6 Infrastructure Strategy**

Protection of groundwater and aquifers is supported in INF POL 31 which aims states:

*“To protect and develop, in a sustainable manner, the existing groundwater sources and aquifers in the County and to manage development in a manner consistent with the protection of these resources.”* This policy is equally relevant to water abstraction and water table drawdown by the extractive industry.

Locally and regionally important groundwater sources aquifers are also considered in the Strategic Environmental Assessment process associated with the County Development Plan.

### **Geothermal Energy**

The benefits of geothermal energy are acknowledged and discussed in Section 6.15.3.3 of the Draft Plan. It is considered that Objective INF OBJ 39 adequately supports the development of this resource.

### **Protected Views and Prospects**

Meath County Council acknowledges the importance and significance of Protected Views and Prospects throughout the County Meath and notes the list of proposed views you submit. An updated survey, both desktop and physical, should be carried out for the entire county.

## **National and Registered Historic Monuments**

While the list of National and Registered Historic Monuments submitted may have architectural expression, their protection under the National Monuments Acts is considered sufficient.

## **Chapter 9 Rural Development Strategy**

With respect to the rural housing policy, please refer to CE's response to grouped 'rural housing policy' themed submissions outlined earlier in this Section of the CE Report. It should be noted that provision is made for persons engaged in rural related business activity could be considered for a one off rural house where it can be demonstrated that it is essential that they live beside their business for operational or safety / security reasons.

Regarding the items addressed (**Limitations for Quarry Developments**) are as follows

- (a) Quarries to remain 1.5m above the water table is only achievable with sand and gravel operations. Not realistic where the extraction of rock takes place as most rock deposits exist below the water, however more accurate assessments on the management of ground water and its effects on the surrounding areas required in the planning process.
- (b) May extend beyond 15 years depending on reserves. Most Rock quarries operating in MCC are above the 15 year ceiling. To extract better quality rock reserves, which exist at greater depths, may require extraction to take place for decades
- (c) Depends on the geology of the area i.e case by case application.
- (d) Something that is or should be addressed in any application regarding quarries that operate close to water courses which would require a mandatory EIA, and or NIS
- (e) Quarry ancillary guidance notes are 55dB(A). Possible greater emphasis on introduction of better noise reduction measures at the planning stage i.e. screening, bunding etc
- (f) Quarry ancillary guidance notes are currently 350mg. Possible greater emphasis on introduction of better dust control. Conditional that all lorries use covers relating to the transportation of material to and from quarries/landfills.
- (g) These are the current guidelines
- (h) This is a supply and demand issue.
- (i) Resources issue both manpower and financial
- (j) Agreed and to submit to the Local authority on a regular basis.

## Chapter 11 Development Management - response

- Please refer to the response on Chapter 3 – Settlement Strategy above in relation to the request to provide a policy/objective excluding the construction of Build-to-Rent and Shared Accommodation development typologies.
- With regard to the naming of housing states it should be noted that DM OBJ 50 and DM OBJ 51 addresses the naming of housing estates in both Irish and English as well requiring that street names shall reflect local place names, particularly townlands or local names which reflect the landscape or shall reflect culture and /or history, including names of historical persons who have some association with the area.

## **Chapter 10 Climate Change**

1. Meath County Council must work with the data-sets available and latest emissions data. Though this data does not reflect the present-day emissions, in the absence of the availability of live data, the figure presented provide the most accurate presentation of emissions data for the county.

2. The Climate Action Strategy that was adopted in 2019 contains both a strategy for adaptation and mitigation for County Meath. A summary of this strategy will be included in Chapter 10, Section 10.4 of the Draft Plan.

3. Rainfall data is collected by the Met Eireann in multiple locations around the country including Meath. It is therefore unnecessary for Meath County Council to simultaneously collect this data. Increased rainfall leading to flooding and damaging key infrastructure is highlighted as a key risk associated with climate change. In response to such potential outcomes, the Draft Plan contains a range of policies and objectives that aim to address the issue. INF OBJ 16, INF POL 19, MOV OBJ 55, INF POL 20 refers.

4. It is agreed that though the Draft Plan is aligned with national commitment on climate change, certain plans and strategies have not been referenced in Chapter 10 on Climate Change due to their recent adoption. Accordingly, the following plans will be incorporated into section 10.4 of the Draft Plan:

- The Climate Action Plan 2019
- Meath Climate Action Strategy (refer to response to No. 2 above)

Other statutory documents have been incorporated into other sections of the Draft Plan, as appropriate. Reference to the Meath Climate Action Strategy in Section 6.4.2 must be updated to reflect its finalised status.

5. The Chief Executive would support the commissioning of a study to assess sectoral emissions in Co. Meath. Such a study will be subject to funding and the availability of resources.

6. The Chief Executive has reviewed the Draft Plan with consideration of the measures proposed to reduce emissions. While the reduction of emissions is not explicitly stated, there are a significant number of policies and objectives in Chapter 5 of the Draft Plan, focusing on a more sustainable transport system which is essential to reduce Ireland's carbon emissions and reach the Government's goal of an 80% reduction in carbon emissions by 2050. It is fundamental that this Plan promote greater mobility by walking, cycling, rail and bus with one of the main mitigation strategies of the transport plan being to increase the efficiency of the transport system and reducing the need for car ownership.

With regard to the electrification of the transport fleet, Section 9.2 Meath's Climate Action Strategy aims to investigate the feasibility of piloting low carbon alternatives vehicles through

lease agreements. Meath's Climate Action Strategy is supported by INF POL 45 of the Draft Plan which states: *"To support the development and implementation of a local Climate Action Strategy which should identify vulnerability climate risks, quantify emissions produced, identify costs and prioritise adaptation actions in accordance with the National Adaptation Framework."*

7. The overriding objective to reduce GHG emissions is therefore implicit in a number of policies and objectives.

8. It is the policy of RUR POL 17 *"To maintain a vibrant and healthy agricultural sector based on the principles of sustainable development whilst at the same time finding alternative employment in or close to rural areas to sustain rural communities"* thereby promoting sustainable agricultural development. As part of Meath's Climate Action Strategy suitable areas of council land will be planted with trees, future expanding Meath's carbon sinks. Looking at regenerative farming and horticultural practices, within that Climate Action Strategy, section 14.2 states *"NR1.1 Engage with the agricultural community to understand how the local council can support resilience efforts and sustainable farming practices."* Through this, the Council hopes to promote and support sustainable farming practices.

9. Policies and objectives to protect soil, water and reduce GHGs are adequately covered in the Draft Plan.

10. Support of policies INF POL 37 – INF OBJ 43 is noted and welcomed. GHG emissions are considered at the planning application stage as part of the environmental assessment of a project and in line with the EMRA RSES, see page 41 which states:

*Regional Policy Objectives: "Environmental Assessment and Assessment of Greenhouse Gas (GHG) Emissions*

*RPO 3.4: Ensure that all plans, projects and activities requiring consent arising from the Regional Spatial and Economic Strategy are subject to the relevant environmental assessment requirements including SEA, EIA and AA as appropriate. In addition, the future strategic development of settlements throughout the Region will have full cognisance of the legal requirements pertaining to sites of International Nature Conservation Interest.*

*RPO 3.5: Identification of suitable employment and residential lands and suitable sites for infrastructure should be supported by a quality site selection process that addresses environmental concerns such as landscape, cultural heritage, ensuring the protection of water quality, flood risks and biodiversity as a minimum.*

*RPO 3.6: City and County Development Plans shall undergo assessment of their impact on carbon reduction targets and shall include measures to monitor and review progress towards carbon reduction targets."*



11. The provision of community funding and environmental impact considerations are addressed in the environmental assessment and planning application documentation associated with a planning process for renewable energy developments. The Draft plan also contains a suite of policies and objectives to protect the architectural, cultural and environmental value of the county. Chapter 8 on Cultural and Natural Heritage Strategy refers.

12. - The suggestion to develop a Rapid Response programme for flooding is noted. Though this is not a matter for the County Development Plan, attention should be drawn to the Council's Major Emergency Plan and Severe Weather Emergencies Sub-Plan. This Plan facilitates the response to, and recovery from, major emergencies by Meath County Council and ensures that the Council's arrangements are co-ordinated with those of the other two designated Principal Response Agencies, the Health Service Executive and An Garda Síochána.

- Should the Author wish to view areas of potential flood risk, this is available online for viewing at [floodinfo.ie](http://floodinfo.ie).

- With regard the rollout of electric fleets, this is supported within the Meath Climate Action Plan with an action to start trialling electric vehicles for the MCC fleet.

13. INF POL 19, 20, 24, 25, 27, 29 & 30 are appropriately located under Section 6.10.2 Flood Risk Management of the Draft Plan. It is agreed however, that these policies are incorrectly located within the Chapter 10 of the Draft Plan and should be relocated to Section 10.6.3. on Water Resource Management.

14: The protection of local and regionally important groundwater resources are adequately covered by INF POL 31 of the Draft Plan.

15. The additional text proposed for INF OBJ 21 is not considered necessary. Any appropriate emergency measures to mitigate against climate change will, by their nature, satisfy the justification test and therefore does not need to be stated in the objective.

16. The provision of an Irrigation Management, Water Storage plans and Soil Management Plans for the region are outside the scope of the County Development Plan. Such plans must be tailored to the operational uses associated with private lands and would be best steered by the relevant Authority and best practice guidance.

17. The responsibility for the preparation of Fire Risk Assessment & Management Plan is also outside the remit of the County Development Plan.

18. Support for the production of locally sourced food is already provided for in ED POI 22 of the Draft Plan and through Boyne Valley Flavours, a network which aims to promote locally produced produce and the people that created them.

19. The siting of burial grounds are subject to flood risk principles and are assessed against the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009).

20. All transport related issues are located within the Movement Strategy of the Draft Plan, within which MOV OBJ 55 and MOV OBJ 56 are located. It is noted that though MOV OBJ 56 supports the selection of materials for road repairs and transport maintenance strategies with a view to climate change considerations, the selection of suitable materials must also be in compliance with relevant standards such as the Specification of Road Works Series 900 and any associated or superseding documents. Accordingly, and to ensure clarity, MOV OBJ 56 should be amended to ensure that maintenance or road upgrades are also carried out in accordance with Transport Infrastructure Ireland (TII) guidance.

#### **Protected Views and Prospects**

Meath County Council acknowledge the importance and significance of Protected Views and Prospects throughout the county of Meath and note the list of proposed views you submit. An updated survey, both desktop and physical, should be carried out for the entire county.

#### **National and Registered Historic Monuments**

While the list of National and Registered Historic Monuments submitted may have architectural expression, their protection under the National Monuments Acts is considered sufficient.

#### **Chief Executive's Recommendation**

##### **Chapter 10 Climate Change Strategy.**

1. No change required
2. Amend Section 10.4 Policy Context to insert the following text:

##### **Meath Climate Action Strategy**

**The Meath Climate Action Strategy covers the period from 2019-2025 and aims to support businesses, social enterprises, public bodies and communities to change their energy systems to produce a climate resilient economy. The Strategy focuses on changes to key areas such as mobility, the built environment, clean energy, resource management, water and natural resources identifying methods by which Meath County Council can support change in these areas.**

3. No change required

4. Amend Section 10.4 Policy Context to insert the following text:

***Climate Action Plan 2019 To Tackle Climate Breakdown***

**The Climate Action Plan is a national policy document adopted in 2019. The Plan identifies the critical nature of the challenge faced as a result of global warming. The Plan underpins this ambition to deliver a step-change in our emissions performance over the coming decade by setting out clear 2030 targets for each sector and the expected emissions savings that will result. The overall aim will allow Ireland to meet its EU targets for 2030 and will also be well placed to meet our mid-century decarbonisation objectives.**

5. No change required

6. No change required

7. No Change required

8. No change required

9. No change required

10. No change required

11. No change required

12. No change required

13. Delete INF POL 19, 20, 24, 25, 27, 29 & 30 and associated text from Section 10.6.2 of the Draft Plan and relocate located to Section 10.6.3. on Water Resource Management.

14. No change required

15. No change required

16. No change required

17. No change required

18. No change required

19. No change required

20. Amend MOV OBJ 56 as follows: To ensure that any transport maintenance and improvement strategies **consider** ensure future climates are considered, ~~to~~ **by** allowing appropriate selection of materials and prioritisation of road for repair **subject to adherence to TII standards**