



# Chief Executive Report

## Draft Variation No. 1 of Meath County Development Plan 2021-2027

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May 2024

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# Introduction

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## 1.0 Introduction & Overview of the Chief Executive's Report

### Purpose & 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 Proposed Variation No. 1 to the Meath County Development Plan 2021-2027, and will set out the Chief Executive's response to the issues raised in the submissions, and make recommendations on the proposed amendments, as appropriate.

The Meath County Development Plan 2021-2027 was adopted in 22<sup>nd</sup> September 2021 and came into effect on the 3<sup>rd</sup> November 2021 (hereafter the Meath CDP). The CDP includes a Core Strategy which outlines the preferred development strategy for the county together with future population and housing growth targets over the plan period. It is proposed to bring forward, consider and adopt four proposed variations to the Meath CDP in 2024 and Proposed Variation No. 1 comprises the first variation to the Meath CDP 2021-2027.

Pursuant to Section 13 of the Planning and Development Act 2000 (as amended), notice of the preparation of Proposed Variation No. 1 to the Meath County Development Plan 2021-2027 was given on 27<sup>th</sup> March 2024. Submissions and observations with regard to the Proposed Variation together with Strategic Environmental Assessment and Appropriate Assessment Screening Reports were invited for a period of 4 weeks from 27<sup>th</sup> March 2024 to 26<sup>th</sup> April 2024 inclusive.

Pursuant to Section 13(4)(b) of the Planning and Development Act 2000 (as amended), this Chief Executive's Report provides details of the submissions and observations received in relation to the Proposed Variation No. 1 as follows:

1. List the persons or bodies who made a submission or observation under this section;
2. Summarise the issues raised by the person or bodies in the submissions;
3. Give the response of the Chief Executive to the issues raised, taking account of the proper planning and sustainable developments of the area, the statutory obligations of any local authority in the area, and any relevant policies or objectives for the time being of the Government or any Minister of the Government.

## 1.1 Summary of Proposed Variation No. 1 of the Meath CDP 2021-2027

Variation No. 1 consists of the following proposed amendments;

- **Proposed Amendment to Chapter 1 (Introduction)**

**Proposed Amendment No. 01:** The introduction of an objective to facilitate the replacement of the Written Statements for respective settlements in the Meath County Development Plan 2021-2027 with a new Local Plan, Joint Local Area Plan or Joint Urban Area Plan upon their adoption by the Elected Members. The land use zoning objectives contained in Volume 2 of the Meath County Development Plan 2021 -2027 will be retained.

**Reason:** To facilitate the replacement of the Written Statement for respective settlements in the Meath County Development Plan 2021-2027 with a new Local Area Plan, Joint Local Area Plan or Joint Urban Area Plan upon their adoption by the Elected Members.

- **Proposed Amendment to Chapter 2 (Core Strategy) and Volume 2 (Written Statements for Settlements);**

**Proposed Amendment No. 02:** Proposed Variation No. 2 aims to update, provide flexibility and incorporate guidance from the 'Development Plan Guidelines for Planning Authorities 2022', into Chapter 2 'Core Strategy' and to remove duplicate core strategy objectives contained in Volume 2 Written Statements for Settlements.

**Reason:** To update relevant provisions for the Core Strategy from Section 28 *Development Plan Guidelines for Planning Authorities 2022* into the County Development Plan and to ensure an adequate supply of housing can be delivered to meet demand in the county.

- **Proposed Amendments to Chapter 2 (Core Strategy)**

**Proposed Amendment No. 03:** Insert objective to reallocate 781 residential units which were completed prior to the adoption of the County Development Plan to larger settlements in Tiers 1 to 5<sup>1</sup> where there is a demonstrated demand for housing and sufficient supporting services available.

**Reason:** To update relevant provisions of the Core Strategy and facilitate housing delivery through a new objective in the County Development Plan that will accommodate reallocated housing units in the Core strategy to larger settlements where housing demand, zoned land, and services already exist.

## 1.2 Consultation Process on the Draft Variation No. 1 to the Meath CDP 2021-2027

Consultation on Draft Variation No. 1 to the County Development Plan 2021-2027 together with respective Strategic Environmental Assessment and Appropriate Assessment Screening Reports was carried out for period of 4 weeks from 27<sup>th</sup> March to 26<sup>th</sup> April inclusive.

The key elements of the consultation programme are set out below:

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<sup>1</sup> See Appendix 1 for details of the Settlement Hierarchy in the Meath County Development Plan 2021-2027

- Notices of the Proposed Draft Variation No. 1 to the County Development Plan 2021 -2027 were published in the Meath Chronicle and the Drogheda Independent and the Meath County Council Public Consultation Portal. The notices included information on how to make a submission on the Proposed Draft Variation No. 1 and associated Environmental Reports.
- Notice of the Proposed Draft Variation No.1 together with information on public consultation issued to the prescribed bodies.
- The Draft Variation No. 1 and associated Environmental Reports were placed on public display in Buvinda House, each Municipal District Office, online at [www.consult.meath.ie](http://www.consult.meath.ie), the Meath County Council website and all MCC Social Media Platforms. All relevant websites and social media platforms included details of the consultation on the Proposed Draft Variation No. 1 including information on how to make a submission via the online Consultation Portal and by post. Updates and reminders were issued via Social Media Platforms.

Seventeen submissions were received during the Proposed Draft Variation No. 01 consultation period.

### **1.3 Approach to Consideration of Submissions**

Following the uploading of all submission to the online portal, each submission was reviewed to allocate the issue to the relevant section appropriate of the Proposed Draft Variation of the County Development Plan 2021-2027. The 'Index of Submissions', outlined in section 2 below, identifies each submission by unique submission number, name, proposed amendment number to which it related, and page number where it is contained in the report.

Please refer to the template document on the next page which gives guidance on how each submission has been dealt with.

### Template explanatory notes

Template Guidance	
<b>Variation No:</b>	This is the proposed Variation No.
<b>Chapter/ Section</b>	The relevant section of the plan or policy or objective that is referred to is listed here
<b>Proposed Draft Variation Amendment:</b>	
This section states the relevant variation amendment which was place on public display	
<b>Submissions Received</b>	The section lists relevant submission numbers which relate specifically to the proposed variation amendment.
<b>Summary of Submission</b>	
This section provides a summary of the submission	
<b>Chief Executive Response</b>	
This section outlines the Chief Executive’s Response to the issues raised in the submissions received.	
<b>Chief Executive Recommendation</b>	
This section outlines the recommendation of the Chief Executive in response to the issues raised in the relevant submissions received i.e.;	
<ul style="list-style-type: none"><li>• It is recommended that the Plan be amended with the proposed variation amendment as displayed;</li><li>• It is recommended that the Plan not be amended with the proposed variation amendment as displayed; or</li><li>• It is recommended that the Plan be amended with the proposed variation amendment as displayed, subject to minor modifications.</li></ul>	

## 1.4 Conclusion

In accordance with Section 13(6)(a) of the Planning and Development Acts 2000 as amended, the members, having considered the Proposed Variation and Chief Executive's Report, may, by resolution as they consider appropriate, make the variation, with or without modifications, or they may refuse to make it.

A handwritten signature in black ink, appearing to read 'Kieran Kehoe', written over a horizontal line.

Kieran Kehoe  
Chief Executive

## 2.0 Index of Submissions

Submission No.	Name	Amendment No.	Page
<b>MH-C142-1</b>	Environmental Protection Agency	Proposed Amendment No. 01 (Chapter 1) Proposed Amendment No. 02 (Chapter 2/Volume 2) Proposed Amendment No. 03 (Chapter 2	41
<b>MH-C142-2</b>	HSA	Proposed Amendment No. 01 (Chapter 1) Proposed Amendment No. 02 (Chapter 2/Volume 2)	19
<b>MH-C142-3</b>	TII	Proposed Amendment No. 01 (Chapter 1) Proposed Amendment No. 02 (Chapter 2/Volume 2) Proposed Amendment No. 03 (Chapter 2)	20
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<b>MH-C142-9</b>	Kells Anglers	Proposed Amendment No. 2 (Chapter 2/Volume 2)	29
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<b>MH-C142-11</b>	Kells Anglers	Proposed Amendment No.2 (Chapter 2/Volume 2)	29
<b>MH-C142-12</b>	Office of Public Works	SFRA	25
<b>MH-C142-13</b>	Louth County Council	Proposed Amendment No. 01 (Chapter 1)	29
<b>MH-C142-14</b>	Office of Planning Regulator	Proposed Amendment No. 01 (Chapter 1) Proposed Amendment No. 02 (Chapter 2/Volume 2) Proposed Amendment No. 03 (Chapter 2)	8
<b>MH-C142-15</b>	Eastern and Midlands Regional Assembly	Proposed Amendment No. 01 (Chapter 1) Proposed Amendment No. 02 (Chapter 2/Volume 2) Proposed Amendment No. 03 (Chapter 2)	14
<b>MH-C142-16</b>	Declan Brassil (on behalf of Cairn Homes)	Proposed Amendment No. 02 (Chapter 2/Volume 2)	29
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## 3.0 Submissions

### 3.1 Key Submissions

<b>Submission</b>	<b>MH-CO142-14 – Office of Planning Regulator</b>
<b>Amendment No:</b>	Proposed Amendment 1, 2 and 3
<b>Summary of Submission</b>	
<p>The Office acknowledges the reason for the proposed Variation, which is to ensure the delivery of housing in support of the growth targets under the RSES and NPF, having regard to the provisions of the Development Plans, Guidelines for Planning Authorities (2022) (the Development Plans Guidelines) and also, the significant challenges faced by the planning authority in delivering sufficient housing and the pressure to deliver more housing units in certain settlements within the commuter belt of the Greater Dublin Area. However, the Office has a number of concerns which can be summarised as follows:</p> <p>The Office acknowledges that housing delivery for the county is below target at the Two-Year Plan Review Stage. However, the Office is also aware that many settlements have reached capacity in terms of core strategy housing targets, but not those settlements identified for significant growth under the NPF and the RSES regional growth strategy, including Drogheda Regional Growth Centre and Navan and Maynooth Key Towns. While some flexibility may be warranted in the implementation of the core strategy, in view of the statutory obligations, it is important that this is applied in a transparent and plan-led manner to avoid undermining the integrity of the recently adopted core strategy.</p> <ul style="list-style-type: none"><li>• <b>Proposed Amendment No. 1</b> introduces new objective INT OBJ 1 and associated text. This provides that future LAPs will supersede the existing written statements for the relevant settlement in the Development Plan (Volume 2). This new objective and associated text also provide that future LAPs will update the relevant household allocation for the settlement concerned, without a concurrent variation of the core strategy of the Development Plan. This will result in household allocations for certain settlements which are inconsistent with those of the core strategy.</li></ul> <p><b>Recommendation:</b> Amend new objective INT OBJ 1 and associated text in the proposed Variation to provide that the Development Plan will be varied in tandem with the preparation of the Local Area Plan / Joint Local Area Plan / Joint Urban Area Plan and to delete or amend the relevant written statement in Volume 2 of the Development Plan to ensure there no conflicting objectives or other provisions in the Development Plan; and amend proposed objective INT OBJ 1 and associated text to delete reference to updating the relevant household allocation for the settlements under future LAPs / JLAPs / JUAPs, except where this is carried out in tandem with an evidence-based variation of the core strategy.</p>	

- **Proposed Amendment No. 3** - The effect of these changes makes provision for 781 housing units additional to the core strategy of the Development Plan, the justification for which is not clear based on the information available.

The Office states that these additional units are independent of the settlement strategy of the Development Plan and equally applies to all settlements with the exception of villages and rural nodes and the open countryside. This approach fails to provide a vision for how the county is likely to grow and develop over the lifetime of the Development Plan. The core strategy of the Development Plan sets a housing allocation target of almost 17,000 units for the plan period. This strategy was determined in advance of the Housing Supply Target Methodology for Development Planning, Guidelines for Planning Authorities (2020) issued by the Minister in December 2020, under which a significantly lower housing supply target would apply. The core strategy therefore already incorporates significant flexibility in terms of the delivery of housing across settlements in the county.

While the proposed Variation acknowledges ‘that the county has zoned a sufficient amount of land to accommodate household allocation up to 2027’, it contradictorily provides that ‘additional provision’ of lands may be considered. In this regard, section 4.4.3 of the Development Plans Guidelines provides that any ‘additional provision’ must be clearly set out in the core strategy and must take into account specified criteria.

The Office also has concerns that the proposed Variation of policy CS POL 1 and objective CS OBJ 3 would undermine the statutory role of the core strategy which is identified in section 10(1A) of the Act as a fundamental element of the development plan.

**Recommendation 2:** (i) Review the justification for the proposed additional 781 housing units having regard to the core strategy of the Development Plan and amend the provisions of the proposed Variation to reflect the outcome of this review, including, the text, table, and new objective (CS OBJ 3A);

and;

(ii) omit or amend the proposed wording of Policy CS POL 1, Objective CS OBJ 3 and proposed objective CS OBJ 3A (where its inclusion has been justified in accordance with part (a) of this recommendation to ensure that the Development Plan provides a vision for the spatial distribution of any justified additional housing growth in accordance with the core strategy and settlement strategy of the Development Plan and consistent with relevant national and regional policy, as specified above.

- **Environmental assessments:** In view of the uncertainty in the future allocation of the 781 units to a settlement or settlements, the Office considers the screening conclusions to be unsupported as the potential impacts are uncertain or unknown.
- **Other Matters:** The Office recommends the review of the numbering of headings to align with the CDP and the list of the subject core strategy objectives to ensure relevant objectives are included.

### Chief Executive Response

The Chief Executive welcomes the submission from the Office of the Planning Regulator (OPR) and recognises and endorses the role of the OPR within the Planning System. Meath County Council has

a very positive working relationship with the OPR and looks forward to continuing and developing relations through further engagement in all functions of the office. MCC acknowledges and accepts that higher tier settlements have remaining capacity in terms of their household allocation and it continues to be a priority of Meath County Council to direct growth towards these higher tier centres. The allocations to higher tier settlements in the Core Strategy are significantly large enough to support their role and function, but as we are only 2.5 years into the implementation of the MCDP 2021-2027, MCC are confident that those allocations to larger tier settlements shall be utilised in full with the passage of time. Indeed, the number of planning permissions granted in the Regional Growth Centre and Key Towns relative to lower-tier settlements in the first two years of the CDP reflects this commitment. Data to this effect is evident in the 2-Year CDP Progress Report and the OPR is invited and welcomed to review same .

Notwithstanding this, it is the view of the Council that facilitating growth in the Regional Growth Centres and Key Towns will not be sufficient in itself to ensure the delivery of housing targets for the county as outlined in the Meath CDP 2021-2027. A failure to deliver upon these housing targets will be further compounded by the evidence that Meath grew by 13.2% in the 2022 census, indicating that the growth target outlined in the Meath CDP 2021-2027 is below the real housing requirements of the county. In the absence of the provision of revised numbers emerging from the NPF review and econometric modelling, all of which will have to be provided by the Eastern and Midlands Regional Assembly through an updated RSES document, the Council accept that it must remain consistent with its statutory obligations, but in the social interest and current housing demand in the county, must also ensure that the level of housing delivered does not fall short of its housing target during the CDP period.

Through the statutory 2 year review of the MCDP 2021-2027, the Council has become aware of the additional capacity of towns within the tiers Self-Sustaining Growth Towns and Self-Sustaining Towns that they have existing physical and social infrastructure to accommodate modest further population growth that will remain consistent with the existing NPF and RSES. To ensure a transparent and plan-led approach is taken, it is the intention of the Council to carry out a Settlement Capacity Audit for all lands within the county to identify settlements that are best placed to accommodate further development into the future. This will be carried out as part of a future Variation to the MCDP and will ensure an evidence based approach is taken to any future allocation of housing. This variation is also likely to incorporate all relevant elements of the NPF Update and review, including new population and housing allocations. In the interim between now and when the revised population and housing figures are published, it is the intention of the Council that the distribution of the 781 units will be directed towards these towns subject to these settlements containing the necessary social and physical infrastructure.

#### **Proposed Amendment No.1**

The Chief Executive notes the concerns of the OPR on the alignment of the County Development Plan with future Local Area Plans and the need to ensure their consistency. The intention of this objective was to remove the administrative burden of carrying out multiple variations to replace Written Statements in Vol.2 and on the adoption of each Local Area Plan. However, the Council acknowledges the risk of confusion where the content of the Development Plan to be replaced is not deleted by way of variation (as proposed). Accordingly, MCC agree with the recommendation of the OPR and will carry out a variation with the adoption of the LAP to ensure consistency between both plans. Nonetheless, the Chief Executive believes it is important to highlight that these Written Statements will be replaced by their respective Plans on adoption. This can instead be outlined by way of additional text as opposed to an objective. INT OBJ 1 will therefore be removed from Section 1.5.1 of the CDP. For clarity, it is also proposed to make a minor modification to this heading from *Existing Suite of Local Area Plans to Written Statements for Settlements in Meath*.

### Proposed Amendment No. 03

(i) As outlined in Proposed Amendment No.3, while it was previously understood that the existing units not yet built in the county comprised 5,820 units, subsequent commencement, and completion data as part of the Two-Year Review of the County Development Plan identified that 781 of these residential units were completed and/or expired in 2019 and therefore were outside of the household allocation period of 2020-2027, at that time. The basis of this re-calculation is that while 781 units were correctly considered completed and were included in Column E of Table 2.12 '**Approximate Households Completed Units 2016-2019**', these units were also being incorrectly included as incomplete and extant in Column F '**Extant Units not yet built**' of the Core Strategy Table 2.12, therefore these residential units were being double counted. On this basis, it is procedurally correct to remove 781 units from Column F of the Core Strategy. This is on the basis of the analysis and evidence gathered during the 2 year review of the Development Plan and it is strongly held view of MCC that the core strategy remains aligned and consistent with both the NPF and RSES.

The request to clearly identify the re-allocation of 781 units to specific settlement centres in order to ensure that the Core Strategy remains consistent with the RSES for the Eastern and Midland Region is noted. It should be highlighted that the introduction of the proposed flexibility objective will not alter the NPF projections or the RSES population projection for the county, nor increase the population projection for the County. Meath County Council has been consistent with the principles and policies of the NPF and the RSES in the preparation of the Meath CDP and continues to remain consistent in Proposed Variation No.1.

Furthermore, it is not intended to allocate any of the additional housing units/population to the Regional Growth Centre or Key Towns. A review of housing allocation and availability of serviced lands indicates that the reallocation of the 781 residential units are not required in the above settlements due to sufficient allocations already being available and would be best utilised in the in Tier 3-4 settlements, many of which have reached their housing allocation despite having the necessary physical and social infrastructure services and appropriately zoned residential lands to accommodate additional growth. The level of flexibility proposed serves only to ensure the Core Strategy housing targets can be delivered in the face of numerous infrastructural and market constraints that has been presented to the Planning Authority since the adoption of the CDP.

The Council acknowledges that the Draft Variation does not attach the 781 Units to any given settlement and there were justifiable reasons as to why this was not done. However, it is a view of the Council that the Core Strategy is narrowly defined within the current CDP, and in the interest of supporting the *Housing for All Strategy 2021*, a greater level of flexibility is essential to the timely delivery of housing subject to the proper planning criteria.

This level of flexibility serves only to ensure the Core Strategy housing targets can be delivered in the face of numerous infrastructural and market constraints that has been presented to the Planning Authority since the adoption of the CDP. The Council also wish to highlight the precedent of a similar level of flexibility within other Local Authority Development Plans such as Fingal County Council which states:

*'Fingal OBJ:*

*Provide for flexibility in achieving the housing supply targets and meeting housing demand, the Council will consider the re-distribution of housing and population figures within each settlement. In this regard, where a site greater than 0.25ha has the potential to exceed the allocation for a particular settlement as set out under Table 2.14, the applicant must demonstrate to the Planning*

*Authority that the necessary social and physical infrastructure is in place or can be provided as part of the application to accommodate the proposed development.'*

A similar objective exists in the South Dublin County Development Plan 2022-2028, demonstrating that there is an established principle of flexibility within the distribution of housing units between settlements that is embedded in respective Core Strategies. The flexibility objective proposed as part of Variation No.1 is therefore a recognised practice and works within the scope of the policies and objectives of the NPF and RSES and still provide the necessary level of consistency with the parent documents .

While the proposed Variation states that the county has zoned a sufficient amount of land to accommodate household allocation up to 2027, the effects of having zoning the minimum quantum required can unintentionally result in a failure to achieve housing targets should landowners choose to hoard or overvalue their lands. In response to this and as part of the active land management strategy, the Council proposes that 'additional provision' of lands may be considered. This is supported by Section 4.4.2 of the Development Plan Guidelines that recognise that *'there is a need for some degree of competition and choice in the residential development land market and to ensure a future pipeline of well-located serviced land.'* Section 4.4.1 of the Development Plan Guidelines also states, *'development plans must build in sufficient flexibility to ensure that housing development not progressing on one or more sites cannot operate to prevent other suitable sites that may be developed within the life of the development plan, from coming forward'*.

Any proposal to zone additional lands will be based on *Section 4.4.3 of the Development Plan Guidelines*. While the Planning Authority can promote the development of land by way of land activation measures such as the RZLT, it is not possible to force landowners to sell or develop their land for residential purposes. Therefore, where strategic lands are not being brought forward, the zoning of additional lands will be considered to ensure a degree of choice and competition can exist for the duration of CDP.

(ii) In relation to **Proposed Amendment No. 2**, the Council recognise the concerns raised by the OPR in relation to CS POL 1 and CS OBJ 3. The intention of these amendments were to broaden the scope of Core Strategy considerations beyond the scope of Table 2.12 to incorporate the considerations outlined in Section 4.4.1 – 4.4.5 of the *Development Plan Guidelines 2022*. Given that it is not the intention to dilute the obligations of the planning authority under Section 10(1A), 10(2A) of the Planning and Development Act 2000, nor could such an amendment absolve the Council of its legislative requirement, CS POL1 and CS OBJ 3 will nonetheless be revised to address the concerns of the OPR while retaining the key aim and intention of the amendment, which is the incorporation of the *Development Plan Guidelines, 2022* into the factors that inform compliance with the Core Strategy.

### **Environmental Assessments**

It is not possible to assess the impact of potential future land use zoning variations at this stage of the process. There are no additional zoning as a result of this proposed variation. The updated figures within the Core Strategy will only be allocated in accordance with the MCDP Settlement Strategy, those settlements that have the capacity and necessary services to accommodate development on existing serviced and appropriated zoned land. Based on the above, the proposed Variation will not result in any significant effects on any European sites and the existing screening documents accompanying the proposed variation adequately deals with this. Should additional lands be proposed for zoning as part of a future Variation, this will be subject to an AA Screening and full AA, where required.

### **Other Matters**

The Chief Executive acknowledges the points raised in relation to Section numbering and the incorrect reference to SH OBJ 1 being located in Volume 2. As set out in the draft Variation, Draft Variation No.1 proposes to consolidate repetitive objectives within Chapter 2 and Volume 2 - Written Statements. In this respect, no change is required. However, the Planning Department will make the other necessary revisions to ensure the proposed Variation aligns with the Meath CDP.

### **Chief Executive Recommendation**

#### **Proposed Amendment No. 01 - Chapter 1 Introduction**

Amend Proposed Amendment No.1 as follows:

##### **~~Section 1.5.1 Existing Suite of Local Area Plans~~ Written Statements for Settlements in Meath.**

~~A Local Area Plan is currently in place for the following settlement centres: Ashbourne, East Meath, Dunshaughlin, Dunboyne, Ratoath and the Southern Environs of Drogheda.~~

A Written Statement and Land Use Zoning objectives map to establish a framework for inter alia the future LAP's, to support economic development and to provide a basis for continued operation of the development management process pending the completion of the LAP's (in the case of Drogheda the UAP) has been included in Volume 2 for each Settlement. These Written Statements will continue to have effect unless they are replaced and superseded by their respective Local Area Plan, Joint Local Area Plan or Joint Urban Area Plan. On adoption, the Local Area Plan, Joint Maynooth Local Area Plan or Joint Drogheda Urban / Local Area Plan will replace the respective Written Statement in Volume 2 of the Meath County Development Plan 2021-2027 by way of a variation to the Plan. During the intervening period, the Written Statement contained in the Meath County Development Plan will continue to have effect.

##### **~~INT OBJ 1~~**

~~When adopted, the Local Area Plan, Joint Local Area Plan or Joint Urban Area Plan will replace the respective Written Statement and update the relevant household allocation while retaining the land use zoning objectives contained in Volume 2 of the Meath County Development Plan 2021-2027. During the intervening period, the Written Statement contained in the Meath County Development Plan will continue to have effect.~~

#### **Proposed Amendment No. 02 - Chapter 2 Core Strategy**

Amend Proposed Amendment No. 2 as follows:

**CS POL 1:** To promote and facilitate the development of sustainable communities in the County by monitoring and managing the level of growth in each settlement to ensure future growth is in informed by accordance with the Core Strategy and County Settlement Hierarchy in order to deliver compact urban areas and sustainable rural communities.

**CS OBJ 3:** To be guided by ensure the implementation of the population, housing growth and household allocation set out in the Core Strategy and Settlement Strategy, insofar as practicable. Meath County Council will monitor the number of units that are permitted and delivered under construction/built as part of the implementation of this objective, in compliance with the Development Plan Guidelines 2022.

Amend explanatory text in Page 5 and Page 10 as follows:



Draft Variation No.1 also proposes to consolidate repetitive objectives within Chapter 2 and Volume 2 – Written Statements, by removing the following to avoid unnecessary duplication;

SH OBJ 1, ASH OBJ 1, ATH OBJ 1, GHIB OBJ 1, BAL OBJ 1, BLMD 1, CAR OBJ 1, CARN OBJ 1, CLO OBJ 1, CRO OBJ 1, DON OBJ 1, NAV OBJ 1, DNS OBJ 1, KEL OBJ 1, TRM OBJ 1, DCE OBJ 1, RA OBJ 1, ENF OBJ 1, STA OBJ 1, KIL OBJ 1, DUL OBJ 1, **LON OBJ 1** ~~OLD OBJ 1~~, OLD OBJ 1, DRUM OBJ 1, GOR OBJ 1, JUL OBJ 1, KEN OBJ 1, KILB OBJ 1, KILD OBJ 1, KILM OBJ 1, KLM OBJ 1, MOY OBJ 1, NOB OBJ 1, RATHC OBJ 1, RATH OBJ 1, SLN OBJ 1, SUM OBJ 1

**Proposed Amendment No. 03 – Reallocation of residential units**

Amend Explanatory text to *Proposed Amendment No. 3 – Reallocation of residential units* as follows:

In Variation No. 1, it is now proposed to re-allocate these units to larger Settlements in Tier ~~3-4~~ **3-4** ~~1-5~~ in accordance with the CDP growth and settlement strategy and to ensure full utilisation of existing infrastructure and resources in the County.

Amend *Proposed Amendment No. 3 – Chapter 2, Introduction of Text and Table under Table 2.12* as follows:

In Variation No. 1, it is now proposed to re-allocate these units to ~~larger~~ Settlements in Tier ~~1-5~~ **3-4** in accordance with the CDP growth and settlement strategy and to ensure full utilisation of existing infrastructure and resources in the County. This data coupled with the fact that a number of settlements are reaching or have reached their targeted household allocation demonstrates the need for incorporating flexibility into the Core Strategy to ensure appropriate housing delivery against the backdrop of the current housing crisis and in line with the Government Housing Strategy, Housing for All (2021).

Settlement	Additional Household Allocation
Settlement <del>1-5</del> <b>3-4</b>	781*

\* Units recorded as extant permissions that were completed or expired prior to 2020.

**Insert New Objective** *CS OBJ 3A: The 781 residential units shall only be applied to Tier ~~1-5~~ **3-4** Settlements where there is a demonstrated demand for housing and sufficient supporting services available including access to employment, public transport, water/wastewater, commercial/retail services and social infrastructure. This will be implemented through the Development Management function, monitored by the Forward Planning Department and applicable until such time as the National Planning Framework Review is completed and adopted*

<b>Submissions</b>	<b>MH-C142-15 – Eastern and Midlands Regional Assembly</b>
<b>Amendment No.</b>	Proposed Amendment 1, 2 and 3
<b>Summary of Submission</b>	
<p>The EMRA welcome the proposed variation to the plan.</p> <p><b>Proposed Amendment No. 1:</b> EMRA has no objection in principle to the replacement of the Written Statements but proposes that in the preparation any future LAP, JLAP, or JUAP, it should be acknowledged that the contents of such plans is required to be consistent with the settlement strategy outlined in Section 4.2 of the EMRA Regional Spatial and Economic Strategy 2019-2031 (RSES) for the region, in addition to Table 2.12 (Core Strategy Table, Population and Household Distribution to 2027) contained in the Meath County Development Plan 2021-2027.</p> <p><b>Proposed Amendment No. 2:</b></p> <p>The wording of the proposed amendments to Policy CS POL 1 “is not considered consistent with current planning legislation and development guidelines.” EMRA proposes that the proposed deletion of <i>‘in accordance with the Core Strategy and County Settlement Hierarchy’</i> not be carried out. Similarly, the EMRA requests the following text not be varied <i>‘ensure the implementation.’</i> Concerns are similarly raised for CS OBJ 3.</p> <p>The submission states that there is an error in the numbering of the variation in Section 2.8.1.1. which it is repeated in the following section.</p> <p>The Regional Assembly request the removal of the statement <i>‘In identifying the residential land requirement for this Plan and addressing the issue of excess lands, a significant quantum of residential lands were de-zoned in accordance with the RSES guidance during the County Development Plan review’.</i></p> <p>There appears to be an anomaly in the sub-heading numbering in this proposed variation for the new sub-section 2.8.1.1 as the adopted Meath CDP 2021-2027 already has an existing sub-heading under Section 2.8.1.1 titled ‘Joint Urban Area Plan for Drogheda.’</p> <p>The Assembly notes that the explanatory text on the last paragraph on Page 4 of the report prepared as part of the proposed variation includes reference to ‘such development in brownfield or town centre locations should be considered Core Strategy neutral and therefore acceptable subject to all other normal planning considerations’ The Assembly requests that further information be shared regarding the ‘core strategy neutral’ lands and the justification for this and how it is consistent with the RSES and national policies</p> <p>There is no objection to the proposed deletion of the duplicate core strategy objectives</p> <p><b>Proposed Amendment No. 3</b></p> <p>The Assembly notes the reason for the reallocation of the 781 units but would like the draft variation and core strategy table (Table 2.12) should be amended so that the re-allocation of units is clearly identifiable to specific settlement centres in order to ensure that the Core Strategy remains consistent with the RSES for the Eastern and Midland Region.</p>	



## Chief Executive Response

### Proposed Amendment No. 1:

The Chief Executive acknowledges the comments of EMRA with respect to Proposed Amendment No.1, ensuring that any future plans remain consistent with the Settlement Strategy and Core Strategy for the County. The Council wishes to re-affirm that all future plans will be carried out and shall be consistent with national, regional and local policy, including Table 2.12 (Core Strategy Table, Population and Household Distribution to 2027).

Notwithstanding this, the Council refers EMRA to the response to the OPR and their concern with the alignment of the County Development Plan and future Local Area Plans.

The intention of this objective was to remove the administrative burden of carrying out multiple variations to replace written statements in Vol.2 and on the adoption of each Local Area Plan. However, the Council acknowledges the risk of confusion where the content of the Development Plan to be replaced is not deleted by way of variation (as proposed) and accordingly, MCC agree with the recommendation of the OPR and EMRA and will carry out a variation with the adoption of the LAP to ensure consistency between both plans. Nonetheless, the Chief Executive believes it is important to highlight that these Written Statements will be replaced by their respective Plans on adoption. This can instead be outlined by way of additional text as opposed to an objective. INT OBJ 1 will therefore be removed from Section 1.5.1 of the CDP. For clarity, it is also proposed to make a minor modification to this heading from existing suite of Local Area Plans to Written Statements for Settlements in Meath.

### Proposed Amendment No. 2:

- As outlined in the Chief Executive response to the OPR submission, the Council recognise the concerns raised by the EMRA in relation to CS POL 1 and CS OBJ 3. The purpose of these amendments was to broaden the scope of Core Strategy considerations beyond the scope of Table 2.12 to incorporate the considerations outlined in Section 4.4.1 – 4.4.5 of the *Development Plan Guidelines 2022*. Given that it is not the intention to dilute the obligations of the planning authority under Section 10(1A), 10(2A) of the Planning and Development Act 2000, nor could such an amendment absolve the Council of its legislative requirement, CS POL1 and CS OBJ 3 will nonetheless be revised to address the concerns of the OPR while retaining the key intention of the amendment, which is the incorporation of the *Development Plan Guidelines, 2022* into the factors that inform compliance with the Core Strategy.
- The Council wish to acknowledge the need to renumber Section 2.8.1. On adoption, this section will be renumbered to encompass the following sub-headings:
  - 2.8.1.1 Eastern Regional and Economic Spatial Strategy*
  - 2.8.1.2 Development Plan Guidelines for Local Authorities (2022)*
  - 2.8.1.3 Joint Urban Area Plan for Drogheda*
- It is noted that the Regional Assembly requested the removal of the statement in Section 2.8.1.1 that states '*In identifying the residential land requirement for this Plan and addressing the issue of excess lands, a significant quantum of residential lands were de-zoned in accordance with the RSES guidance during the County Development Plan review*'. This statement is reflective of guidance in Section 4.3 of the RSES - Taking Account of

Existing Plans that states, 'Core strategies may apply prioritisation measures and/or de-zoning of land where a surplus of land is identified in plans with regard to the NPF Implementation Roadmap up to 2031.' The Council acknowledge that prioritisation measures were also recommended in Section 4.3 and in the interest of clarity, will revise this text.

- The Council note EMRA's reference to the statement that development in brownfield or town centre locations should be considered Core Strategy neutral.

The Town Centre First Policy, launched on 4 February 2022, is a major cross-government policy that aims to tackle vacancy, combat dereliction and breathe new life into our town centres. This includes the regeneration of brownfield sites for housing purposes. Contrarily, where settlements have reached their housing capacity, vacancy and dereliction in town centres cannot be addressed with housing provision, irrespective of the presence of infrastructure and access to services. The intention of this text was to support Town Centre First Policy. Notwithstanding this, it is evident that concerns have been raised in respect of this text that may instead discourage the activation of brownfield/infill sites. According, The Council will remove this text to alleviate any concerns raised in respect of this section of the proposed Variation.

### **Proposed Amendment No. 3**

- The request to clearly identify the re-allocation of 781 units to specific settlement centres in order to ensure that the Core Strategy remains consistent with the RSES for the Eastern and Midland Region is noted. It should be highlighted that the introduction of the proposed flexibility objective will not alter the NPF projections or the RSES population projection for the county, nor increase the population projection for the County. Meath County Council has been consistent with the principles and policies of the NPF and the RSES in the preparation of the Meath CDP and continues to remain consistent in Proposed Variation No.1.

Furthermore, it is not intended to allocate any of the additional housing units/population to the Regional Growth Centres or Key Towns. A review of housing allocation and availability of serviced lands indicates that the reallocation of the 781 residential units are not required in the above settlements due to sufficient allocations already being available and would be best utilised in the in Tier 3-4 settlements, many of which have reached their housing allocation despite having the necessary physical and social infrastructure services and appropriately zoned residential lands to accommodate additional growth. The level of flexibility proposed serves only to ensure the Core Strategy housing targets can be delivered in the face of numerous infrastructural and market constraints that has been presented to the Planning Authority since the adoption of the CDP.

The Council also wish to highlight the precedent of a similar level of flexibility within other Local Authority Development Plans such as Fingal County Council which states:

*'Fingal OBJ:*

*Provide for flexibility in achieving the housing supply targets and meeting housing demand, the Council will consider the re-distribution of housing and population figures within each settlement. In this regard, where a site greater than 0.25ha has the potential to exceed the allocation for a particular settlement as set out under Table 2.14, the applicant must demonstrate to the Planning Authority that the necessary social and physical infrastructure*

*is in place or can be provided as part of the application to accommodate the proposed development.'*

A similar objective exists in the South Dublin County Development Plan 2022-2028, demonstrating that there is an established principle of flexibility within the distribution of housing units between settlements. The flexibility objective proposed as part of Variation No.1 is therefore a recognised practice and works within the scope of the policies and objectives of the NPF and RSES.

## **Chief Executive Recommendation**

### **Proposed Amendment No. 01 - Chapter 1 Introduction**

Amend Proposed Amendment No.1 as follows:

#### **~~Section 1.5.1 Existing Suite of Local Area Plans~~ **Written Statements for Settlements in Meath.****

~~A Local Area Plan is currently in place for the following settlement centres: Ashbourne, East Meath, Dunshaughlin, Dunbooyne, Ratoath and the Southern Environs of Drogheda.~~

A Written Statement and Land Use Zoning objectives map to establish a framework for inter alia the future LAP's, to support economic development and to provide a basis for continued operation of the development management process pending the completion of the LAP's (in the case of Drogheda the UAP) has been included in Volume 2 for each Settlement. These Written Statements will continue to have effect unless they are replaced and superseded by their respective Local Area Plan, Joint Local Area Plan or Joint Urban Area Plan. On adoption, the Local Area Plan, Joint Maynooth Local Area Plan or Joint Drogheda Urban / Local Area Plan will replace the respective Written Statement in Volume 2 of the Meath County Development Plan 2021-2027 by way of a variation to the Plan. During the intervening period, the Written Statement contained in the Meath County Development Plan will continue to have effect.

#### **~~INT OBJ 1~~**

~~When adopted, the Local Area Plan, Joint Local Area Plan or Joint Urban Area Plan will replace the respective Written Statement and update the relevant household allocation while retaining the land use zoning objectives contained in Volume 2 of the Meath County Development Plan 2021-2027. During the intervening period, the Written Statement contained in the Meath County Development Plan will continue to have effect.~~

### **Proposed Amendment No. 02 - Chapter 2 Core Strategy**

Amend Proposed Amendment No. 2 as follows:

**CS POL 1:** To promote and facilitate the development of sustainable communities in the County by **monitoring** and managing the level of growth in each settlement to ensure future growth is **informed by** accordance with the Core Strategy and County Settlement Hierarchy in order to deliver compact urban areas and sustainable rural communities.

**CS OBJ 3:** To **be guided by** ensure the implementation of the population, housing growth **and** household allocation set out in the Core Strategy and Settlement Strategy, insofar as practicable. Meath County Council will monitor the number of units that are permitted and **delivered under**

construction/built as part of the implementation of this objective, [in compliance with the Development Plan Guidelines 2022](#).

Amend **Proposed Amendment No. 2** in Chapter 2 – Core Strategy, Section 2.8.1 to renumber sub-headings as follows:

2.8.1.1 Eastern Regional and Economic Spatial Strategy

2.8.1.2 Development Plan Guidelines for Local Authorities (2022)

2.8.1.3 Joint Urban Area Plan for Drogheda

Amend Explanatory text in Section 2.0 Summary of proposed variation no. 1 of the Meath County Development Plan 2021-2027 as follows:

Where settlement household allocations have been met or at capacity and where centrally located brownfield/infill sites remain available for development, prioritization will be given to vacant sites in town centre locations once physical and social infrastructure is available and adequate. ~~Such development in brownfield or town centre locations should be considered Core Strategy neutral and therefore acceptable subject to all other normal planning considerations.~~

Amend Chapter 2 Core Strategy, Section 2.8.1.1 as follows:

*'In identifying the residential land requirement for this Plan and addressing the issue of excess lands, a significant quantum of residential lands were de-zoned [to align the amount of lands zoned with the housing allocation for each settlement](#) ~~in accordance with the RSES guidance during the County Development Plan review~~'.*

### **Proposed Amendment No. 03 – Reallocation of residential units**

As per the OPR Chief Executive Recommendation - Amend Explanatory text to *Proposed Amendment No. 3* – Reallocation of residential units as follows:

In Variation No. 1, it is now proposed to re-allocate these units to larger Settlements in Tier ~~3-4~~ ~~4-5~~ [3-4](#) in accordance with the CDP growth and settlement strategy and to ensure full utilisation of existing infrastructure and resources in the County.

Amend *Proposed Amendment No. 3* – Chapter 2, Introduction of Text and Table under Table 2.12 as follows:

In Variation No. 1, it is now proposed to re-allocate these units to ~~larger~~ Settlements in Tier ~~1-5~~ [3-4](#) in accordance with the CDP growth and settlement strategy and to ensure full utilisation of existing infrastructure and resources in the County. This data coupled with the fact that a number of settlements are reaching or have reached their targeted household allocation demonstrates the need for incorporating flexibility into the Core Strategy to ensure appropriate housing delivery against the backdrop of the current housing crisis and in line with the Government Housing Strategy, Housing for All (2021).

Settlement	Additional Household Allocation
Settlement <del>1-5</del> <a href="#">3-4</a>	781*

\* Units recorded as extant permissions that were completed or expired prior to 2020.

**Insert New Objective** *CS OBJ 3A: The 781 residential units shall only be applied to Tier 1 to 5 3-4 Settlements where there is a demonstrated demand for housing and sufficient supporting services available including access to employment, public transport, water/wastewater, commercial/retail services and social infrastructure. This will be implemented through the Development Management function, monitored by the Forward Planning Department and applicable until such time as the National Planning Framework Review is completed and adopted*

<b>Submissions</b>	<b>MH-C142-2 - Health and Safety Authority (HSA)</b>
<b>Amendment No.</b>	General Submission
<b>Summary of Submission</b>	
<p>The Health and Safety Authority directs the council to consider its document ‘<i>Guidance on technical land-use planning advice</i>’</p> <p>In addition, the HSA indicated it would expect ‘the planning guidelines’ to contain:</p> <ul style="list-style-type: none"> <li>- An indication of planning policy in relation to major accident hazard sites notified under the regulations, which reflects the intentions of Article 13 of Directive 2012/18/EU.</li> <li>- The consultation distances and generic, where applicable, supplied by the Authority to Meath County Council in relation to such sites. These distances to be indicated on the various maps included in the plan, as well as any more specific distances and advice supplied by the Authority.</li> <li>- A policy on the siting of new major hazard establishments, taking account of Article 13 and the published policy of the Authority in relation to new development, including developments in the vicinity of such establishments.</li> </ul> <p>Mention of the following notified establishments:</p> <ul style="list-style-type: none"> <li>o Grassland Agro, The Pound Road, Slane, Co. Meath</li> <li>o Great Northern Distillery, Cloncowan, Kill, Trim, Co. Meath</li> <li>o Unilin Insulation Ireland Ltd, Liscarton Industrial Estate, Kells Road, Navan, Co. Meath.</li> <li>o Boliden Tara Mines DAC, Knockumber Road, Navan, Co. Meath</li> <li>o Kemek Limited, Clonard, Enfield, Co Meath,</li> </ul>	
<b>Chief Executive Response</b>	
<p>This submission from the HSA provides general advice regarding the content of development plans. However, with respect to various issues raised;</p> <ul style="list-style-type: none"> <li>- The Meath County Development Plan 2021-2027 addresses the Seveso Sites in Section 13 of Chapter 11 ‘Development Management Standards and Land Use Zoning Objectives.’</li> </ul>	

- The Meath County Development Plan 2021-2027 in Chapter 11, Table 11.5, lists the Seveso Sites in County Meath or sites where Consultation Distances extend into the County. These are also illustrated on Map 11.1.

On foot of this submission, no modifications to the variation are deemed necessary.

**Chief Executive Recommendation**

No modifications are required to the variation on foot of this submission.

<b>Submission</b>	<b>MH-C142-3 - Transport Infrastructure Ireland</b>
<b>Amendment No.</b>	General Submission
<b>Summary of Submission</b>	
<p>The submission states the following;</p> <p>TII acknowledges and welcomes receipt of a referral of the Notice of Proposed Variation No. 1 to the Meath County Development Plan 2021-2027. TII notes that Variation No. 1 does include proposals for additional or new zonings. The Authority advises it has no observations to make on Variation No. 1.</p>	
<b>Chief Executive Response</b>	
<p>The Chief Executive notes the submission from TII. It is assumed that the submission includes a typographical error and should state 'TII notes that Variation No. 1 does <b>not</b> include proposals for additional or new zonings.</p> <p>On foot of this submission, no modifications to the variation are recommended.</p>	
<b>Chief Executive Recommendation</b>	
No modifications are required to the variation on foot of this submission.	

<b>Submission</b>	<b>MH-C142-6 - Uisce Eireann</b>
<b>Amendment No.</b>	General Submission
<b>Summary of Submission</b>	

UÉ has no objection to the amendments or comments to make in respect to same.

**Chief Executive Response**

The Chief Executive notes the comments from Uisce Eireann.

**Chief Executive Recommendation**

No modifications are required to the variation on foot of this submission.

<b>Submission</b>	<b>MH-C142-7 - Department of Education Submission</b>
<b>Amendment No.</b>	General Submission
<b>Summary of Submission</b>	
<p>This submission from the Dept. of Education acknowledges that there are no proposed changes to projected population growth as outlined in the CDP but notes the possibility that the reallocation of residential units and possible additional residential zoning could impact school provision requirements in the various settlements. The Department will consider this potential impact and will reassess its school place requirements for individual settlements where current Local Area Plans are amended, or future Local Area Plans are proposed. If following such reviews, a need to amend our school place requirement arises, the Department will contact the Council with its observations.</p>	
<b>Chief Executive Response</b>	
<p>The Chief Executive acknowledges the concerns of the Department Of Education in relation to ensuring adequate school provision exists for future development. While the Department intends to review the requirements of individual settlements as part of revised or proposed Local Area Plans, the Chief Executive recommends that frequent liaison with the Department should be carried out on all settlements irrespective of the Local Area Plan process. The Planning and Development Bill 2023, when adopted, will alter the mandatory requirement for all settlements above 5,000 persons and reduce the number of overall LAPs required within a county. It is therefore suggested that an alternative mechanism is identified that will trigger the requirement to review school places in Meath. The Planning Department. will liaise with the Department of Education further on a alternative communication process.</p>	
<b>Chief Executive Recommendation</b>	
<p>No modifications are required to the variation on foot of this submission.</p>	

<b>Submissions Received</b>	<b>MH-C142-17 – National Transport Authority</b>
<b>Amendment No.</b>	Proposed Amendment No. 2 & 3
<b>Summary of Submission</b>	
<ul style="list-style-type: none"> <li>• The NTA raises concerns regarding Proposed Amendment No. 2 which proposes to introduce a measure of flexibility to the application of the Core Strategy, such that growth would be ‘informed by’ rather than ‘in accordance with’ the Core Strategy and County Settlement Hierarchy.</li> <li>• The submission refers to Section 2.8.1 Guiding Principles for Core Strategies in the CDP and its reference to the Development Plan Guidelines that state that ‘<i>zoned housing land in an existing development plan, that is serviced and can be developed for housing within the life of the new development plan under preparation, should not be subject to de-zoning</i>’ but should instead take a phased approach. NTA highlights that the Development Guidelines were issued subsequent to the adoption of the Meath CDP and the provisions of the 2022 Guidelines would therefore not apply.</li> <li>• The submission finally submits that the introduction of a flexibility objective may undermine the Core Strategy for Meath CDP and affect the distribution of population growth at the regional scale and undermine the policies and objectives of the NPF and RSES.</li> </ul>	
<b>Chief Executive Response</b>	
<ul style="list-style-type: none"> <li>• As outlined in the Chief Executive response to the OPR, the Council recognises the concerns raised by the NTA in relation to CS POL 1 and CS OBJ 3. The intention of these amendments was to broaden the definition of Core Strategy considerations beyond the scope of Table 2.12 to incorporate the considerations outlined in Section 4.4.1 – 4.4.5 of the <i>Development Plan Guidelines 2022</i>. Given that it is not the intention to dilute the obligations of the planning authority under Section 10(1A), 10(2A) of the Planning and Development Act 2000, nor could such an amendment absolve the Council of its legislative requirement, CS POL1 and CS OBJ 3 will nonetheless be revised to address the concerns of the OPR while retaining the key intention of the amendment, which is the incorporation of the <i>Development Plan Guidelines, 2022</i> into the factors that inform compliance with the Core Strategy.</li> <li>• While the <i>Development Plan Guidelines 2022</i> were not in place at the time of the adoption of the Meath County Development Plan 2021-2027, it is clear from the 2022 Guidelines that the act of de-zoning a significant quantum of serviced lands is not the preferred approach. Meath County Council is in the process of completing a Settlement Capacity Audit that will identify all serviced lands in Meath. Irrespective of the fact that the Meath CDP was adopted prior to the guidelines, the provisions of these guidelines apply and the intention of Variation No. 1 is to bring greater alignment between both documents.</li> <li>• Concerns relating to the proposed flexibility undermining the distribution of population growth for the region is noted. As outlined in the EMRA Chief Executive response, the introduction of the proposed flexibility objective will not alter the NPF projections or the RSES population projection for the county, nor increase the household allocation for the County. Meath County Council has been consistent with the principles and policies of the NPF and the RSES in the preparation of the Meath CDP and continues to remain consistent in Proposed Variation No.1.</li> </ul>	



Furthermore, it is not intended to allocate any of the additional housing units/population to the Regional Growth Centres or Key Towns. A review of housing allocation and availability of serviced lands indicates that the reallocation of the 781 residential units are not required in the above settlements due to sufficient allocations already being available and would be best utilised in the lower Tier Settlements in Tier 3-4 settlements, many of which have reached their housing allocation despite having the necessary physical and social infrastructure services and appropriately zoned residential lands to accommodate additional growth. The level of flexibility proposed serves only to ensure the Core Strategy housing targets can be delivered in the face of numerous infrastructural and market constraints that has been presented to the Planning Authority since the adoption of the CDP. As stated in CS OBJ 3A the allocation shall only be applied to settlements where there is a demonstrated demand for housing and sufficient supporting services available. The allocation of these units will be closely monitored by the Forwarded Planning Department as part of ongoing Core Strategy Monitoring.

The Council also wishes to highlight the precedent of a similar level of flexibility within other Local Authority Development Plans such as Fingal County Council which states:

*'Fingal OBJ:*

*Provide for flexibility in achieving the housing supply targets and meeting housing demand, the Council will consider the re-distribution of housing and population figures within each settlement. In this regard, where a site greater than 0.25ha has the potential to exceed the allocation for a particular settlement as set out under Table 2.14, the applicant must demonstrate to the Planning Authority that the necessary social and physical infrastructure is in place or can be provided as part of the application to accommodate the proposed development.'*

A similar objective exists in the South Dublin County Development Plan 2022-2028, demonstrating that there is an established principle of flexibility within the distribution of housing units between settlements. The flexibility objective proposed as part of Variation No.1 is therefore an established practice and works within the scope of the policies and objectives of the NPF and RSES.

### **Chief Executive Recommendation**

As per the OPR submission, the Chief Executive recommends the following minor modifications;

#### **Proposed Amendment No. 2 - Chapter 2 Core Strategy**

Amend Proposed Amendment No. 2 as follows:

**CS POL 1:** To promote and facilitate the development of sustainable communities in the County by **monitoring** and managing the level of growth in each settlement to ensure future growth is in **informed by** accordance with the Core Strategy and County Settlement Hierarchy in order to deliver compact urban areas and sustainable rural communities.

**CS OBJ 3:** To **be guided by** ensure the implementation of the population, housing growth **and** household allocation set out in the Core Strategy and Settlement Strategy, insofar as practicable. Meath County Council will monitor the number of units that are permitted and **delivered under construction/built** as part of the implementation of this objective, **in compliance with the Development Plan Guidelines 2022.**

Amend explanatory text in Page 5 and Page 10 as follows:

Draft Variation No.1 also proposes to consolidate repetitive objectives within Chapter 2 and Volume 2 – Written Statements, by removing the following to avoid unnecessary duplication;

SH OBJ 1, ASH OBJ 1, ATH OBJ 1, GHIB OBJ 1, BAL OBJ 1, BLMD 1, CAR OBJ 1, CARN OBJ 1, CLO OBJ 1, CRO OBJ 1, DON OBJ 1, NAV OBJ 1, DNS OBJ 1, KEL OBJ 1, TRM OBJ 1, DCE OBJ 1, RA OBJ 1, ENF OBJ 1, STA OBJ 1, KIL OBJ 1, DUL OBJ 1, **LON OBJ 1** ~~OLD OBJ 1~~, OLD OBJ 1, DRUM OBJ 1, GOR OBJ 1, JUL OBJ 1, KEN OBJ 1, KILB OBJ 1, KILD OBJ 1, KILM OBJ 1, KLM OBJ 1, MOY OBJ 1, NOB OBJ 1, RATHC OBJ 1, RATH OBJ 1, SLN OBJ 1, SUM OBJ 1

**Proposed Amendment No. 3 – Reallocation of residential units**

Amend Explanatory text to *Proposed Amendment No. 3 – Reallocation of residential units* as follows:

In Variation No. 1, it is now proposed to re-allocate these units to larger Settlements in Tier ~~3-4~~ **3-4** ~~1-5~~ in accordance with the CDP growth and settlement strategy and to ensure full utilisation of existing infrastructure and resources in the County.

Amend *Proposed Amendment No. 3 – Chapter 2, Introduction of Text and Table under Table 2.12* as follows:

In Variation No. 1, it is now proposed to re-allocate these units to larger Settlements in Tier ~~1-5~~ **3-4** in accordance with the CDP growth and settlement strategy and to ensure full utilisation of existing infrastructure and resources in the County. This data coupled with the fact that a number of settlements are reaching or have reached their targeted household allocation demonstrates the need for incorporating flexibility into the Core Strategy to ensure appropriate housing delivery against the backdrop of the current housing crisis and in line with the Government Housing Strategy, Housing for All (2021).

Settlement	Additional Household Allocation
Settlement <del>1-5</del> 3-4	781*

\* Units recorded as extant permissions that were completed or expired prior to 2020.

**Insert New Objective** *CS OBJ 3A: The 781 residential units shall only be applied to Tier ~~1-5~~ 3-4 Settlements where there is a demonstrated demand for housing and sufficient supporting services available including access to employment, public transport, water/wastewater, commercial/retail services and social infrastructure. This will be implemented through the Development Management function, monitored by the Forward Planning Department and applicable until such time as the National Planning Framework Review is completed and adopted*

<b>Submission</b>	<b>MH-C142-12 – Office of Public Works</b>
<b>Amendment No.</b>	General Submission
<b>Summary of Submission</b>	

OPW has carried out a review of the documents and note the continued commitment to adhere to the appropriate application of the Planning System and Flood Risk Management Guidelines (2009) and Circular PL02/2014.

Should any changes to zoning designations in areas of flood risk be implemented in the future, it is important that a flood risk assessment to an appropriate level of detail is carried out and that there is appropriate justification for any decisions made as set out in the Guidelines.

**Chief Executive Response**

The Chief Executive acknowledges the fundamental role of the *Planning System and Flood Risk Management Guidelines (2009)* in land use zoning and will ensure there is an ongoing commitment to adhere to these guidelines.

**Chief Executive Recommendation**

No modifications are required to the variation on foot of this submission.

**Proposed Amendment No.1**

<b>Amendment No:</b>	Amendment No. 1.
<b>Chapter/ Section</b>	Chapter 1
<b>Proposed Draft Variation Amendment:</b>	
<p><del>A Local Area Plan is currently on place for the following settlement centres: Ashbourne, East Meath, Dunshaughlin, Dunbooyne, Ratoath and the Southern Environs of Drogheda.</del></p> <p>A Written Statement and Land Use Zoning objectives maps to establish a framework for interalia the future LAP's, to support economic development and to provide a basis for continued operation of the development and to provide a basis for continued operation of the development management process pending for completion of the LAP's (in the case of Drogheda the UAP) has been included in volume 2 for each Settlement. Centre. These Written Statements will continue to have effect unless they are replaced and superseded by their respective Local Area Plan, Joint Local Area Plan or Joint Urban Area Plan.</p> <p>The introduction of an INT OBJ 1;</p> <p><i>When adopted, the Local Area Plan, Joint Urban Area Plan will replace the respective Written Statement and update the relevant household allocation while retaining the land use zoning objectives contained in Volume 2 of the Meath County Development Plan 2021-2027. During the intervening period, the Written Statement contained in the Meath County Development Plan will continue to have effect.</i></p>	

<b>Submissions Received</b>	<p>MH-C142-5 – Deirdre Madden</p> <p>MH-C142-8 – Protect East Meath</p> <p>MH-C142-13 – Louth County Council</p> <p>MH-C142-14 – Office of Planning Regulator</p> <p>MH-C142-15 – Eastern and Midlands Regional Assembly</p>
<b>Summary of Submission</b>	
<p><b><u>MH-C142-5 – Deirdre Madden</u></b></p> <p>This submission refers to the proposed text update to Section 1.5.1 Existing Suite of Local Area Plans:</p> <p>This submission objects to the above amendment however no reasons are provided.</p> <p><b><u>MH-C142-8 – Protect East Meath</u></b></p> <p>Protect East Meath reminds the Planning Authority that it has a statutory obligation under Section 19(1)(b) of the Planning and Development Act 2000 (the 2000 Act) to prepare local area plans for towns with populations over 5,000. In relation to towns with populations in excess of 1,500 the Planning Authority may, as an exception to the obligation to prepare a local area plan, indicate objectives for the town in the development plan.</p> <p>The Planning Authority is in long-term default of its statutory obligation to prepare a Local Area Plan for Laytown-Bettystown-Donacarne-Mornington (LBMD).</p> <p>The current situation whereby objectives for LBMD are contained within the written statement in the development plan is not consistent with the 2000 Act and therefore it is doubtful that the proposed amendment No. 1 inserting the text “These Written Statements will continue to have effect unless they are replaced and superseded (sic) by their respective Local Area Plan, Joint Local Area Plan or Joint Urban Area Plan” and inserting INT OBJ 1 which includes the text “During the intervening period, the Written Statement contained in the Meath County Development Plan will continue to have effect” insofar as it applies to LBMD is lawful. It seems clear to Protect East Meath that this proposed amendment is ultra vires the Planning Authority since the 2000 Act, specifically, section 10(2), does not permit the inclusion of objectives for a town that requires a mandatory local area plan to be in the written statement of the development plan.</p> <p><b><u>MH-C142-13 – Louth County Council</u></b></p> <p>The Council welcomes the inclusion of objective INT OBJ 1 in the Introduction (Chapter 1) which sets out that the Written Statements for the respective settlements contained within the Meath CDP 2021-2027 will be replaced with a new Local Area Plan, Joint Local Area Plan or Joint Urban Area Plan upon adoption by Elected Members. The preparation of a Joint Local Area Plan for the Regional Growth Centre of Drogheda will ensure compliance with the requirement of Objective RPO 4.11 of the RSES and will provide a framework and strategy for the future growth of Drogheda that will enable the town to develop in accordance with its designation as a Regional Growth Centre.</p>	

## Chief Executive Response

### **MH-C142-5 – Deirdre Madden**

The submission contains no reasons for the objection. Notwithstanding this, as per the response and recommendation to the OPR, the observer is advised that Proposed Amendment No.1 will be revised and INT OBJ 1 is to be removed from Chapter 1 – Introduction of the Meath CDP 2021-2027.

### **MH-C142-8 – Protect East Meath**

The Chief Executive acknowledges the statutory obligation to prepare local area plans for towns with populations over 5,000. CS OBJ 8, CS OBJ 9, CS OBJ 10 and CS OBJ 11 of the Meath CDP outlines the suite of Joint and Local Area Plans to be prepared by Meath County Council within the lifetime of CDP. The Planning Authority is fully aware of its statutory obligation to prepare a Local Area Plan for settlements, including Laytown-Bettystown-Donacarne-Mornington (LBMD). The Council are striving to meet these obligations in the context of available resources and having regard to planning priorities. It is important to note that all settlements are included and incorporated under the umbrella of the Meath County Development Plan 2021-2027 with written statements and objectives for zoning of appropriate lands in respective settlements.

Based on current legislative requirements as well as development pressures, the Council has prepared an indicative Forward Planning programme, which identifies and prioritises Development Plan variations, Joint Urban Plans and Local Area Plans which need to be put in place. This has been forwarded onto Protect East Meath in previous correspondence. This programme recognises the need, inter alia, for a LAP for the Laytown/Bettystown/Mornington/Donacarne area however, there are other statutory plans of greater planning priority which first need to be addressed. The priority listing is not simply based on population size but on location of settlement, position in the settlement hierarchy, scale, population growth trends, constraints, infrastructure capacity and priorities etc.

The Council's capacity to address its' statutory functions is constrained by available resources, including personnel, and statutory requirements and time frames for the preparation of draft plans, public consultation and the adoption of same.

Notwithstanding the constraints under which this Council is operating, every effort is being made to advance the preparation of the various plans as referred to in the attached Forward Planning Programme.

The Council notes the statement by Protect East Meath that this Proposed Amendment No. 1 is beyond its powers. In this respect, Protect East Meath is referred to the Chief Executives response and recommendation to the OPR which will effectively remove proposed Objective **INT OBJ 1** from the Meath CDP. A Section 13 Variation will be carried out to the MCDP for the replacing of the existing Written Statements in volume 2 with the new LAP in line with its adoption.

### **MH-C142-13 – Louth County Council**

The Chief Executive acknowledges the importance of the Drogheda Joint Local Area Plan to the wider region. The Planning Departments of both Meath and Louth are currently reviewing submissions received on the Issues Paper for Drogheda which will inform the preparation of the future plan for the town. Meath County Council looks forward to working with Louth County Council to advance to the next stages of the LAP process.

## Chief Executive Recommendation

As per **OPR Recommendation**, minor modification is proposed to Proposed Amendment No.1 as follows:

### ~~Section 1.5.1 Existing Suite of Local Area Plans~~ **Written Statements for Settlements in Meath.**

~~A Local Area Plan is currently in place for the following settlement centres: Ashbourne, East Meath, Dunshaughlin, Dunboyne, Ratoath and the Southern Environs of Drogheda.~~

A Written Statement and Land Use Zoning objectives map to establish a framework for interalia the future LAP's, to support economic development and to provide a basis for continued operation of the development management process pending the completion of the LAP's (in the case of Drogheda the UAP) has been included in Volume 2 for each Settlement. These Written Statements will continue to have effect unless they are replaced and superseded by their respective Local Area Plan, Joint Local Area Plan or Joint Urban Area Plan. On adoption, the Local Area Plan, Joint Maynooth Local Area Plan or Joint Drogheda Urban / Local Area Plan will replace the respective Written Statement in Volume 2 of the Meath County Development Plan 2021-2027 by way of a variation to the Plan. During the intervening period, the Written Statement contained in the Meath County Development Plan will continue to have effect.

#### ~~INT OBJ 1~~

~~When adopted, the Local Area Plan, Joint Local Area Plan or Joint Urban Area Plan will replace the respective Written Statement and update the relevant household allocation while retaining the land use zoning objectives contained in Volume 2 of the Meath County Development Plan 2021-2027. During the intervening period, the Written Statement contained in the Meath County Development Plan will continue to have effect.~~

## Proposed Amendment No.2

<b>Variation Amendment No:</b>	Variation No.1 - Amendment No. 2
<b>Chapter/ Section</b>	Chapter 2 'Core Strategy' & Volume 2 Written Statements
<b>Proposed Draft Variation Amendment:</b>	
Proposed text update to Section 2.8.1 Guiding Principles for Core Strategies, aims to update, provide flexibility and incorporate guidance from the ' <i>Development Plan Guidelines for Planning Authorities 2022</i> ' in Chapter 2 'Core Strategy' and to remove duplicate core strategy objectives contained in Volume 2 Written Statements for Settlements.	
<b>Submissions Received</b>	MH-C142-4 – Emmand Limited MH-C142-8 – Protect East Meath

	<p>MH-C142-9 &amp; MH-C142-10, MH-C142-11 – Kells Anglers</p> <p>MH-C142-13 – Louth County Council</p> <p>MH-C142-14 – Office of Planning Regulator</p> <p>MH-C142-15 – Eastern and Midlands Regional Assembly</p> <p>MH-C142-16 – Declan Brassil (on behalf of Cairn Homes)</p> <p>MH-C142-17 – National Transport Authority</p>
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### Summary of Submission

#### **MH-C142-4 – Emmand Limited**

The submission states:

The proposed Amendment No. 02 relates to the need to address the suitability of zoned lands for residential development where land zoned for such development is not being developed.

The proposed amendment lists a number of reasons why land zoned for development may not be developed.

- These include; economic viability, site assembly and site ownership, funding, timescales for delivering the necessary physical infrastructure and the nature of speculative land management that may render certain lands unavailable within the lifetime of the plan.

While the overall principle of the proposed amendment is supported, the clients of this submission, who own development land in Longwood, question the rationale for the following restriction ... *'The prioritisation/ phasing of residential lands will only be utilised in the larger settlements where population growth is to be concentrated i.e. Regional Growth Centre, Key Town, or Self-Sustaining Growth Towns and only where there are fundamental reasons which support the requirement to phase such lands'*

- It is requested for the following sentence in the proposed amendment to section 2.8.1.1 of the County Development Plan should be omitted ... *'The prioritisation/ phasing of residential lands will only be utilised in the larger settlements where population growth is to be concentrated i.e. Regional Growth Centre, Key Town, or Self-Sustaining Growth Towns'*

#### **MH-C142-8 – Protect East Meath**

- Protect East Meath is concerned about the explanation for this proposed amendment which seems to be proposed without a fully worked out rationale. For example, the Planning Authority has not analysed why it says there is a shortfall in housing delivery in the county, it has not yet carried out a Settlement Capacity Audit for settlements such as Drogheda and LBMD. It is also not clear from the explanatory material how the development plan (as proposed to be amended) will remain consistent with the EMRA RSES and the NPF, given that the amendment appears to be informed solely by the 2022 Development Plan Guidelines.
- Protect East Meath is concerned about the explanatory text at the bottom of Page 4 of the document which deals with brownfield/infill sites in settlements that have reached capacity.



First of all, brownfield/infill sites should be prioritized regardless of whether the settlement has reached capacity. The NPF requires 30% of all new residential development outside of the cities and their suburbs to be on brownfield or infill sites within the boundary/built footprint of the existing built-up area per NPO 3 of the NPF. Step 2 of the Sequential Test also requires the identification of lands with potential for new residential development that are situated within or closest to the settlement core including brownfield and infill.

- It is incorrect therefore to say that brownfield/infill development in settlements that have reached capacity is “Core Strategy neutral”. Brownfield and infill sites are functionally equivalent to greenfield sites and count towards the Core Strategy. The proposed explanation here reverses the idea of compact growth and the sequential test and has the effect of providing for growth towards the Core Strategy in greenfield sites and thereafter unlimited development on brownfield/infill sites. This makes no sense and will discourage the activation of brownfield/infill sites.
- It is incorrect therefore to say that brownfield/infill development in settlements that have reached capacity is “Core Strategy neutral”. Brownfield and infill sites are functionally equivalent to greenfield sites and count towards the Core Strategy. The proposed explanation here reverses the idea of compact growth and the sequential test and has the effect of providing for growth towards the Core Strategy in greenfield sites and thereafter unlimited development on brownfield/infill sites. This makes no sense and will discourage the activation of brownfield/infill sites.
- Protect East Meath is concerned that all references to the EMRA RSES have been removed from the proposed Section 2.8.1 (the heading 2.8.1.1 in the proposed amendment appears to be a typo). While it is acknowledged that the 2022 Development Plan Guidelines came into force after the adoption of the development plan the RSES is still binding on the Planning Authority which is required to make a plan which is consistent with the RSES and the NPF. The RSES, therefore, remains a “guiding principle” for the Core Strategy.
- The dataset mentioned in the proposed Section 2.9.3 should be made available to the public in fulfilment of the Planning Authority's obligations under the AIE Directive (2003/4/EC) and the Open Data Directive (2019/1024/EU).
- The proposed amendments to CS POL 1 and CS OBJ 3 are extremely concerning.
- CS POL 1 purports to remove a policy to ensure that the level of growth is in accordance with the Core Strategy to one that is informed by the Core Strategy. No justification or other explanation is presented for this amendment.
- CS OBJ 3 purports to remove an objective requiring implementation of the population, housing growth, and household allocation set out in the Core Strategy in so far as practicable and replace it with an objective to be guided by these factors.
- As the Planning Authority is aware the Core Strategy is a statutory requirement under Section 10(1A) of the 2000 Act which requires consistency between the Core Strategy and the NPF and RSES and SPPRs. The change of language proposed in this amendment appears to be contrary to this statutory requirement. While the amendment obviously cannot remove the statutory requirement and cannot vary the Planning Authority's obligations in that regard, the use of language such as “informed by” and “guided by” to replace the imperative language of the adopted plan will introduce legal uncertainty into the development plan.

#### **MH-C142-9 & MH-C142-10, MH-C142-11 – Kells Anglers**

Kells Anglers refers to the statement *“It is acknowledged in the Development Plan Guidelines for Planning Authorities 2022, that when considering the household allocation for settlements, permissions cannot be considered in isolation to the wider issues.”*

In this respect, the submission refers to Kells and the urgent and long overdue need for an upgrade to the overcapacity Kells and Lloyd Business Park WWTPs, and also the increasingly



dysfunctional Kells sewage collection system. The submission outlines the worsening of the sewage system crisis in the town, and increasing raw sewage pollution of the Blackwater River SAC/SPA from the WWTP's Storm Water Outlet No.3, which breaches of the plant's licencing conditions, and the Habitats and Water Framework Directives since 2010.

The ongoing failure to carry out the major plant and collection system upgrade referred to in the 2010 Kells WWTP Licence, and the 2007-13 and 2019-19 Kells Development Plans, are the primary causes of the worsening sewage pollution of the Blackwater River SAC/SPA, via its Kells tributary the Newrath Stream, which is the recipient waters of the untreated sewage from SW3.

The submission ask that MCC fully re-incorporate the protection and enhancement of the full course of the Blackwater's Kells tributary, the now heavily polluted Newrath Stream, as required under the Water Framework, Habitats, Flooding, Drinking Water and Environment Liability Directives. The submission also asks that the current plans, and any changes to the Meath Development Plan on the future development of Kells, follow the correct planning process, including the preparation of a full SEA for Kells, and the completion of the necessary upgrades to the town sewage collection system, and the Kells and Lloyd Business Park, prior to any future development in Kells dependent on the services of the town sewage system.

#### *Drinking Water Supply*

With respect to drinking water requirements, the submission suggests that the available capacity at Lough Bane will not be sufficient to meet the future demands of Oldcastle and Kells. In the case of Kells, this will result on increased dependence on the Blackwater River which is itself an SAC/SPA and subject to strict protection and enhancement regulations. Accordingly, the submission requests that MCC incorporate the current sources of water supply and future supply options, in the preparation of realistic planning for sustainable development in Kells.

#### *Floods Directive*

The submission asks that MCC adhere to the requirements of the Floods Directive, and national regulations and policies, including the updated National Climate Action Plan, for development plans on flood plains and/or connected natural drainage systems at Kells. As part of the required SEA for the proposed new Kells Development Plan, fully consider the EPA submission on the Variations, and the cumulative negative impacts on neighbouring sites from inappropriate development on flood risk sites; and only apply for, or grant planning permissions which adhere to said Directive and policies and regulations on appropriate developments for recognised flood plains and their natural drainage systems. The submission includes a copy of the Kells WWTP & Sewerage System Report from 2020.

#### **MH-C142-13 – Louth County Council**

The Council recognizes the importance of ensuring the availability of sufficient lands to meet projected population and housing growth as set out in national and regional policy and associated guidelines. Objective CS OBJ 3A in the proposed variation indicates that the re-allocation of residential units will be implemented through the Development Management process. Louth County Council would request that the Council be informed of any additional units to be re-allocated to the South Drogheda area to ensure the allocation of such units is aligned with the growth strategy for Drogheda as set out in the Louth and Meath County Development Plans and to be set out in greater detail in the forthcoming Joint Drogheda Local Area Plan. Louth County Council would also request that any planning applications for housing in the South Drogheda areas

that are to be proposed as a result of the re-allocation of units be referred to the Council for comment.

**MH-C142-16 – Declan Brassil (on behalf of Cairn Homes)**

This submission has been prepared on behalf of Cairn Homes, an active housebuilder of scale in County Meath. The submission welcomes the proposed amendments to the CDP stating that the Draft Variation will have a significant benefit in underpinning the objective to prioritise the zoning and phasing of suitably located zoned residential land where there is a high level of certainty that the lands will be developed for housing within the lifetime of the plan.

The submission provides an update on the status of Cairn Homes lands in Navan and requests the removal of Phase 2 restrictions to these lands in order to expedite the future delivery of the orbital distributor road and the southern environs. Accordingly, the request includes the following amendment:

Where such flexibility is awarded, an evidence-based assessment will be carried out that will consider active and expiring planning permissions, units delivered, the function of the settlement and the existing and planned infrastructural, employment and community services available to the settlement (the Asset-Based Approach). The focus and target must however be based on housing delivery as opposed to meeting targets, *and to that end, in accordance with active land management principles, consideration will be afforded to active residential construction sites adjoining or adjacent to currently zoned Phase 2 lands (post 2027) in the same ownership, and opportunities to provide strategic infrastructure in excess of the immediate needs of a particular site that will enable the development of adjoining or adjacent residential zoned lands.*

**Chief Executive Response**

**MH-C142-4 – Emmand Limited**

The Chief Executive notes the comments relating to the statement in the Meath CDP on the prioritisation/phasing of lands. However, this statement forms part of the existing Meath CDP 2021-27 and does not form part of an amendment in Proposed Variation No.1.

It should be highlighted that, Longwood, as with all other settlements in the County will be subject to a Settlement Capacity Audit that will assist in the identification and prioritisation of lands most suitable for development. This will be carried out in a future variation to the MCDP.

**MH-C142-8 – Protect East Meath**

- The Chief Executive notes the concern that all references to the EMRA RSES have potentially been removed from the proposed Section 2.8.1. For clarity, it is not proposed to remove Section 2.8.1.1 Eastern Regional and Economic Spatial Strategy. The Draft Variation proposed to renumber Section 2.8.1. to encompass the following sub-headings:

*2.8.1.1 Eastern Regional and Economic Spatial Strategy*

*2.8.1.2 Development Plan Guidelines for Local Authorities (2022)*

For information purposes and as outlined in Section 2.8.1.1, a comprehensive evaluation of all undeveloped residential lands in each settlement by way of Settlement Capacity Audits (SCA) will inform future zoning and phasing of residential lands. The SCA will inform a future variation

to the County Development Plan and will be carried out for all sites, including lands Drogheda and East Meath. There is no additional zoning as part of this proposed variation.

- The Council notes Protect East Meath’s reference and concern with the statement that ‘development in brownfield or town centre locations should be considered Core Strategy neutral’.

As outlined in the response to EMRA, the Town Centre First Policy, launched on 4 February 2022, is a major cross-government policy that aims to tackle vacancy, combat dereliction and breathe new life into our town centres. This includes the regeneration of brownfield sites for housing purposes. Contrarily, where settlements have reached their housing capacity, vacancy and dereliction in town centres cannot be addressed with housing provision, irrespective of the presence of infrastructure and access to services. The intention of this text was to support Town Centre First Policy. Notwithstanding this, it is evident that concerns have been raised in respect of this text that may instead discourage the activation of brownfield/infill sites. Accordingly, the Council will remove this text to alleviate any concerns raised in respect of this section of the proposed Variation.

- With regard to making the housing dataset publicly available, MCC as the competent authority is the responsible body mandated in the both the Local Government Act and Planning and Development Act 2000-2022 to carry out this work in the administrative area of County Meath. Planning is not and should not be a simple arithmetic or numbers exercise. It is much more complex than that. The implementation of the Core Strategy and the development of settlements are dynamic and are subject to change on the foot of expiring planning permissions or the grant of additional planning permissions. Consequently, a publicly available dataset may be out of date within days of its publication.

When assessing planning applications within the context of the Core Strategy, Meath County Council must rely on Section 4 and Section 10 of the Development Plan Guidelines for Local Authorities 2022 which distinguishes between permissions that have commenced construction and permissions that are yet to commence. While yet-to-commence permissions represent potential housing delivery over the plan period, they cannot be considered in isolation of the wider issues. These wider issues include units delivered, expiring permissions, phasing of permissions, planning appeals, the current and anticipated rate of housing delivery, infrastructural constraints, or other impediments that will be assessed at the pre-planning and planning phase of an application for residential development. The number of large scale residential developments that have been legally challenged through the courts in recent years are also a major impediment to housing delivery and causing further confusion in the monitoring and management of Core Strategies. Given the above variety of factors involved, the number of units granted permission is only one element of the Core Strategy and does not determine the remaining units available as confirmed by Section 4.4.1 and Appendix A Section 1.2.3 of the Development Plan Guidelines for Local Authorities 2022.

- The Council also recognise the concerns raised by Protect East Meath and other bodies in relation to CS POL 1 and CS OBJ 3. The intention of these amendments was to broaden the scope of Core Strategy considerations beyond the scope of Table 2.12 to incorporate the considerations outlined in Section 4.4.1 – 4.4.5 of the *Development Plan Guidelines 2022*. Given that it is not the intention to dilute the obligations of the planning authority under Section 10(1A), 10(2A) of the Planning and Development Act 2000, nor could such an amendment absolve the Council of its legislative requirement, CS POL1 and CS OBJ 3 will nonetheless be revised to address the concerns of the OPR while retaining the key intention of the amendment,

which is the incorporation of the *Development Plan Guidelines, 2022* into the factors that inform compliance with the Core Strategy.

**MH-C142-09, MH-C142-10, MH-C142-11 – Kells Anglers**

The Council notes the concerns of Kells Anglers. Uisce Éireann are the competent authority for the provision of Water and wastewater services and their upgrading, and consequently the upgrading of the sewerage system and water supply and its necessary funding for Kells is outside the control of Meath County Council.

With respect the proposed Variation, no additional household allocation or additional land use zonings is anticipated in Kells as part of this Variation.

The Council wishes to highlight that a comprehensive infrastructure evaluation of all undeveloped residential lands in Kells and all settlements in Meath by way of Settlement Capacity Audits (SCA) will inform future zoning and phasing of residential lands. This provides an assessment of transportation, surface water, social infrastructure, water and wastewater and includes consultation with the Transportation Department, Water Services Department, Environment Department and Community Department within Meath County Council, as well as with Uisce Éireann. The consultations will inform the infrastructural needs within each settlement, including Kells. Both the Council's internal departments and Uisce Éireann will be requested to identify the specific delivery services required to service the lands, confirm if funding for service delivery has been identified in relevant budgets and give a reasonable estimate for the full cost of delivery of these services. All future zonings will be informed by the SCA to ensure there is the necessary infrastructure to accommodate residential development. This assessment will be carried out in advance of any potential Local Area Plan for Kells and will be incorporated into the CDP by way of a future variation.

With respect to the request for a full SEA of Kells, SEA is required to ensure environmental considerations are fully integrated into the preparation of plans or variations. A full SEA of the MCDP 2021-2027 was carried out during the review and preparation of the plan. The proposed variation has been subject to Strategic Environmental Assessment and Appropriate Assessment. No new land use zonings or changes to land use zonings are proposed and there is no change in the manner in which the Plan sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions, or by allocating resources. Accordingly, the SEA Screening Report has concluded that the proposed variation has no real likelihood of having likely significant negative effects on the environment, and therefore full SEA is not required in this instance.

**MH-C142-13 – Louth County Council**

The Chief Executive notes the request from Louth County Council to be informed of any additional units to be re-allocated to the South Drogheda area to ensure the allocation of such units is aligned with the growth strategy for Drogheda as set out in the Louth and Meath County Development Plans and to be set out in greater detail in the forthcoming Joint Drogheda Local Area Plan. As outlined in the Chief Executive response to EMRA, it is the intention of the Council to distribute the 781 units to settlements located within Tier 3-4 – the Self-Sustaining Growth towns and Self-Sustaining towns of Meath. Therefore, it is not anticipated that additional units will be allocated to the Southern Environs of Drogheda. Meath County Council will nonetheless liaise with Louth County Council frequently to work to achieve a balanced approach to future development in Drogheda.

### **MH-C142-16 – Declan Brassil (on behalf of Cairn Homes)**

The Chief Executive notes the proposed additional text to afford further consideration to Phase 2 lands (post 2027) in the same ownership, and opportunities to provide strategic infrastructure in excess of the immediate needs of a particular site that will enable the development of adjoining or adjacent residential zoned lands.

Given that the National Planning Framework is currently under review and update due to be published in September 2024 and in the absence of revised Regional Economic and Spatial Planning Guidelines and a completed Settlement Capacity Audit for Navan, it would be premature to presently afford further consideration to the development of Phase 2 lands in Navan.

### **Chief Executive Recommendation**

#### **Proposed Amendment No. 02 - Chapter 2 Core Strategy**

As per OPR recommendation amend Proposed Amendment No. 2 as follows:

**CS POL 1:** To promote and facilitate the development of sustainable communities in the County by **monitoring** and managing the level of growth in each settlement to ensure future growth is **informed by** accordance with the Core Strategy and County Settlement Hierarchy in order to deliver compact urban areas and sustainable rural communities.

**CS OBJ 3:** To **be guided by** ensure the implementation of the population, housing growth **and** household allocation set out in the Core Strategy and Settlement Strategy, insofar as practicable. Meath County Council will monitor the number of units that are permitted and **delivered under construction/built** as part of the implementation of this objective, **in compliance with the Development Plan Guidelines 2022.**

Amend **Proposed Amendment No. 2** in Chapter 2 – Core Strategy, Section 2.8.1 to renumber sub-headings as follows:

2.8.1.1 Eastern Regional and Economic Spatial Strategy

2.8.1.2 Development Plan Guidelines for Local Authorities (2022)

2.8.1.3 Joint Urban Area Plan for Drogheda

Amend Explanatory text in Section 2.0 Summary of proposed variation no. 1 of the Meath County Development Plan 2021-2027 as follows:

Where settlement household allocations have been met or at capacity and where centrally located brownfield/infill sites remain available for development, prioritization will be given to vacant sites in town centre locations once physical and social infrastructure is available and adequate. ~~Such development in brownfield or town centre locations should be considered Core Strategy neutral and therefore acceptable subject to all other normal planning considerations.~~

Amend Chapter 2 Core Strategy, Section 2.8.1.1 as follows:

*'In identifying the residential land requirement for this Plan and addressing the issue of excess lands, a significant quantum of residential lands were de-zoned **to align the amount of lands***

*zoned with the housing allocation for each settlement in accordance with the RSES guidance during the County Development Plan review’.*

## Proposed Amendment No. 3

<b>Amendment No:</b>	Proposed Amendment No. 03 – Chapter 2 (Core Strategy)
<b>Chapter/ Section</b>	Chapter 2 (Core Strategy)
<b>Proposed Amendment:</b>	
Insert objective to reallocate 781 residential units which were completed prior to the adoption of the County Development Plan to larger settlements in Tiers 1 to 5 where there is a demonstrated demand for housing and sufficient supporting services available.	
<b>Submissions Received</b>	<p>MH-C142-8 – Protect East Meath</p> <p>MH-C142-9, MH-C142-10, MH-C142-11 - Kells Anglers</p> <p>MH-C142-14 – Office of Planning Regulator</p> <p>MH-C142-15 – Eastern and Midlands Regional Assembly</p> <p>MH-C142-17 – National Transport Authority</p>
<b>Summary of Submission</b>	
<p><b><u>MH-C142-8 – Protect East Meath</u></b></p> <ul style="list-style-type: none"> <li>• This proposed amendment is very hard to understand. It appears to create a floating reserve of 781 housing units which may be allocated amongst Tier 1 to 5 settlements on a case-by-case basis until the NPF review is completed. The number of 781 was derived from unpublished data which revealed that this number of units was wrongly recorded as extant permissions when they had in fact been completed or expired prior to 2020. The number in each category is not disclosed in the materials published, nor is the settlement in which the purported discrepancies occurred. All of this serves to obscure both the rationale for and the effect of this proposed amendment.</li> <li>• There is no policy or guidance to say which settlements will receive the extra allocations and no explanation as to why the discrepancies haven’t been applied to the settlements where they arose.</li> <li>• It appears to Protect East Meath that there is a fundamental difference between units that were completed and those that expired. The completed units incorrectly identified as extant (and presumably un-commenced) don’t affect the overall housing delivery in the County and simply transfer between columns in Table 2.12 without affecting the overall total. On the other</li> </ul>	

hand, expired units are removed from the actual or potential capacity to deliver housing. It is unclear why the two categories are treated together.

- There doesn't appear to be a legal basis for a floating allocation of housing in Tier 1 to 5 settlements as is proposed in CS OBJ 3A. The legislation and 2022 Guidelines require housing allocation to be provided on a settlement basis in the development plan. Having a floating allocation that can be deployed in any Tier 1 to 5 settlement in the County entails a significant risk of over-development and misalignment with infrastructure delivery, particularly where the Planning Authority has not carried out settlement capacity audits or infrastructure assessments under the NPF Appendix 3.
- There does not appear to be any monitoring of where this allocation is being assigned to or even safeguards to ensure that it is not exceeded.

#### **MH-C142-9, MH-C142-10, MH-C142-11 Kells Anglers**

See summary under Proposed Amendment No.2

### **Chief Executive Response**

#### **MH-C142-8 – Protect East Meath**

The aim of the proposed amendment allocate 781 units and distribute them to settlements that have the physical and social infrastructure to accommodate additional housing units in settlements that are nearing or reaching their housing allocation for planning permission granted (not delivered) and which have a current housing demand where people want to live This is important in times of a housing crisis and where the local authority is attempting to provide an appropriate balance between urban and rural housing in County Meath. The Settlement Strategy in the Meath County Development Plan 2021-2027 is the framework within which this urban / rural balance is being delivered. In a time of intensifying climate change and the need to reduce carbon footprint and provide more sustainable development, it is the view of MCC that more development should be directed towards existing established settlements that have the assimilative environmental capacity to accommodate such development. Proposed Variation number 01 is providing an interim solution to the Settlement Strategy in the MCDP until such times as Government releases new and updated population and housing figures in the forthcoming NPF review due in September 2024.

A review of existing infrastructure and housing allocations within the county has identified certain Settlements within Tier 3-4 as being a suitable location for these units as certain settlements within these Tiers have both the demand and services to accommodate additional growth. For clarity, the Proposed Variation will be amended to reflect the particular tiers to which the units are to be distributed and the criteria that will apply. It is not considered appropriate to further break down the 781 units and allocate to specific settlements due to the limited amount of units available and in order to allow confined flexibility for distribution with the respective Tiers 3-4.

MCC have been very successful in housing delivery over recent decades and since the adoption of the current MCDP in November 2021, the local authority has been delivering circa 1350 number of units per annum. This however fall short of the targets of circa 1800 per annum but nonetheless, the aim of this proposed variation is to further assist Meath County Council in getting closer to its target of 1800 units per annum and making a further contribution to



meeting our ever increasing national housing targets in accordance with *Section 2.9.5 Projecting Housing Demand up to 2027 and Housing For All*.

The Chief Executive notes the comments of Protect East Meath regarding extant planning permissions, planning permissions that may have expired and housing delivery and how they are outlined in Table 2.12. The aim of a Core Strategy is to support the settlement framework for a county, and in the case of County Meath, this is outlined in Chapter 3 of the MCDP 2021-2027. A core strategy is not and was not meant to be a simple arithmetic exercise. It is however a fluid and dynamic tool that is utilised in the monitoring and implementation of a CDP. As it is not meant to be a simple arithmetic exercise, there is always meant to be some friction or flexibility within it to provide for changes in demand, supply, market conditions or changes in the economy as CDPs are 6 year plans and are proposed to be 10 year plans under the new planning and development bill.

As outlined in our response to the OPR, the basis of this re-calculation is that 781 units were correctly considered completed and were included in Column E 'Approximate Households Completed Units 2016-2019' while also being incorrectly included as incomplete and extant in Column F 'Extant Units not yet built' of the Core Strategy Table 2.12, therefore being double counted. The two categories are treated together because all of these units require removal from Column F 'Extant Units not yet built' in Table 2.12: Core Strategy Table, Population and Household distribution to 2027.

The Council notes the reference to over-development and potential misalignment with infrastructure delivery. In this respect, the Council wish to highlight that any re-distribution of units will only be considered on lands that are already zoned for residential development and serviced in the Meath CDP 2021-2027. As outlined above, the review of existing infrastructure and housing allocations currently underway within the county has identified certain Settlements within Tier 3-4 as being a suitable location to accommodate additional residential units. No additional zoned land is required to accommodate these units. Where applications for these units are to be considered, the necessary physical infrastructure and environmental capacity of the area will be assessed as part of any planning application. It is also a requirement of this Plan that a Social Infrastructure Assessment is included with planning applications for the development of 50 units or more (SH OBJ 24). This Assessment will be required to determine whether existing social and recreational facilities are enough to cater for the needs of the future residents of the development. Any application will therefore be subject to a Social Infrastructure Audit that will take into account the education, childcare, health, recreational and community facilities required to accommodate additional development, thereby safeguarding against the risk over over-development.

With respect to Proposed Objective CS OBJ 3A, Protect East Meath highlight a perceived lack of information on any monitoring of where this allocation is being assigned to or even safeguards to ensure that it is not exceeded. MCC advise that a 2 year monitoring report was completed in November 2023 and presented to the members of MCC. This report provided an in-depth analysis of the monitoring and implementation of all policy and objectives of the CDP and has provided invaluable information as to what is working well, areas for improvement and guidance as to areas to be addressed when the CDP is due for review which will commence in Q4 next year. As highlighted in Proposed Amendment No.3, the Residential Tracking Monitoring System for Co. Meath is operational and is the key quantitative data source used to analyse and report residential planning and construction activity. This internal dataset is supported by Central Statistics Office (CSO) data on population, housing completions and employment figures. This database will provide a baseline for planning permissions and development in each settlement and safeguards against over-development. Any units proposed over and above a settlement's household allocation must be discussed in advance with the



Forward Planning Department and will be subject to a rigorous assessment of services and facilities. CS OBJ 3A will be amended on foot of the submissions received.

**MH-C142-9, MH-C142-10, MH-C142-11 Kells Anglers**

- See response under Proposed Amendment No.2 to Kells Anglers.

**Chief Executive Recommendation**

**Proposed Amendment No. 03 – Reallocation of residential units**

Amend Explanatory text to *Proposed Amendment No. 3 – Reallocation of residential units* as follows:

In Variation No. 1, it is now proposed to re-allocate these units to larger Settlements in Tier ~~3-4~~ ~~4~~ ~~5~~ in accordance with the CDP growth and settlement strategy and to ensure full utilisation of existing infrastructure and resources in the County.

Amend *Proposed Amendment No. 3 – Chapter 2, Introduction of Text and Table under Table 2.12* as follows:

In Variation No. 1, it is now proposed to re-allocate these units to ~~larger~~ Settlements in Tier ~~1-5~~ ~~3-4~~ in accordance with the CDP growth and settlement strategy and to ensure full utilisation of existing infrastructure and resources in the County. This data coupled with the fact that a number of settlements are reaching or have reached their targeted household allocation demonstrates the need for incorporating flexibility into the Core Strategy to ensure appropriate housing delivery against the backdrop of the current housing crisis and in line with the Government Housing Strategy, Housing for All (2021).

Settlement	Additional Household Allocation
Settlement <del>1-5</del> 3-4	781*

\* Units recorded as extant permissions that were completed or expired prior to 2020.

**Insert New Objective** *CS OBJ 3A: The 781 residential units shall only be applied to Tier ~~1 to 5~~ 3-4 Settlements where there is a demonstrated demand for housing and sufficient supporting services available including access to employment, public transport, water/wastewater, commercial/retail services and social infrastructure. This will be implemented through the Development Management function, monitored by the Forward Planning Department and applicable until such time as the National Planning Framework Review is completed and adopted*

### 3.5 SEA/AA Report Submissions

<b>Submissions Received</b>	<b>MH-C142-1 - Environmental Protection Agency</b> <b>MH-C142-8 – Protect East Meath</b>
<b>Summary of Submissions</b>	
<b><u>MH-C142-1 - Environmental Protection Agency</u></b>	
<p>The EPA is one of the statutory environmental authorities under the SEA Regulations. In its role as a SEA environmental authority, the EPA sets out recommendations and SEA guidance for integrating environmental considerations into Local Authority land use plans. The submission contains various guidance links and data on SEA, AA, and the Water Framework Directive.</p> <p>With respect to sustainable development, the EPA recommends that adequate and appropriate critical service infrastructure should be in place or required to be put in place, to service any development proposed and authorized during the lifetime of the plan or programme.</p>	
<b><u>MH-C142-8 – Protect East Meath</u></b>	
<p>The SEA Directive requires that modifications of plans be subject to strategic environmental assessment therefore this and the other variation should be subject to SEA. Exceptionally minor modifications are not required to be assessed unless they are determined to have likely significant effects on the environment.</p> <p>There is no information published by the Planning Authority to demonstrate that this is a minor modification and therefore it appears that the screening for SEA has been proposed in error and the variation should be subject to the assessment under the SEA Directive.</p> <p>In any event the modifications are far from minor. The modifications proposed removing policies and objectives seeking to implement the Core Strategy and replacing them with ones with more advisory-type meaning. This is not a minor modification but a radical change to the plan.</p> <p>Secondly, the proposed amendment purports to increase the number of housing units allocated to Meath by 781 until the NPF is reviewed but does not indicate where or how this is to be managed. Therefore, the environmental effects of this amendment are uncertain and should be assessed also appears to allow unlimited housing growth on brownfield/infill sites in settlements that have achieved their protected housing growth under the Core Strategy.</p> <p>Third and finally there is plan-splitting. All proposed variations (including those that are planned but have yet to be published) to the development plan should be treated together as functionally a single modification to the plan under the SEA Directive.</p>	
<b>Chief Executive Response</b>	
<b><u>MH-C142-1 - Environmental Protection Agency</u></b>	

The Chief Executive notes the submission from EPA and will ensure the recommendations outlined are incorporated into the final SEA Determination.

The Chief Executive notes the recommendation to ensure that adequate and appropriate critical service infrastructure should be in place or put in place, to service any development proposed. To this extent, a comprehensive evaluation of all undeveloped residential lands in each settlement by way of Settlement Capacity Audits (SCA) will inform future zoning and phasing of residential lands. The SCA will inform a future variation to the County Development Plan.

#### **MH-C142-8 – Protect East Meath**

The Plan comprises a Proposed Variation (No.1), which is not considered a minor modification to the County Meath Development Plan 2021-2027. As such, the proposed variation has been subject to screening for the requirement for Strategic Environmental Assessment in accordance with Article 13K(1) and the relevant criteria set out in Schedule 2A of the Planning and Development Regulations 2001, as amended, (which transpose the requirements of S.I. 436 of 2004 as amended by S.I. 201 of 2011). The Screening Report concludes that the proposed variation has no real likelihood of having likely significant negative effects on the environment, and therefore full SEA is not required.

As noted in the SEA Screening Report, the proposed variation proposes amendments across three broad areas:

- First, where modifications are warranted to give effect to the adoption of upcoming Local Area Plans, Joint Local Area Plans or Joint Urban Area Plans which will replace the respective Written Statements.
- Second, to introduce flexibility in the permitting, delivery and distribution of housing set out in Chapter 2, the Core Strategy, where appropriate and in line with national and regional policy.
- And third, for the consolidation/removal of duplication of objectives in Vol. No.2 of the Development Plan with those already in Chapter 2 of Vol. No.1 of the Plan.

The proposed variation does not include for additional housing units - but rather amends and updates information on existing residential planning permissions that were calculated/double-counted during the preparation of the development plan which was over an extended period due to NPF and RSES reviews. The proposed variation identifies 781 units, which form part of the household allocation period 2020-2027, but which were included in both Column E and Column F in the Plan. As part of the amendments to the the proposed variation, the 781 units will be allocated to Settlements in Tier 3 – 4 only – Self-Sustaining Growth and Self-Sustaining Towns in accordance with the CDP growth and settlement strategy to ensure full utilisation of existing infrastructure and resources in the County.

No new land use zonings or changes to land use zonings are proposed as part of Variation No. 1 and there is no change in the manner in which the Plan sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions, or by allocating resources.

To clarify, unlimited housing growth on brownfield/infill sites in settlements that have achieved their projected housing growth under the Core Strategy is not proposed as part of proposed Variation No.1. The basis of this text has been outlined in response to Protect East Meath's submission on Proposed Amendment No.2, along with a recommendation to remove the relevant text.

With respect to the concept of Plan-splitting, each variation, on its adoption will be integrated into the CDP, a single plan that has been subject to SEA. As part of the SEA Screening Report for Proposed

Variation No.1, the degree to which the Variation influences other plans, including those in a hierarchy has been considered. There is no change to the findings of the Strategic Environmental Assessment (SEA) and associated Environmental Report and Statement prepared for the Meath County Development Plan 2021-2027.

Any future Variation with any potential for significant negative effects will be subject to a full SEA in accordance with the provisions of SEA Directive.

#### **Chief Executive Recommendation**

The Chief Executive notes the submissions and will ensure the recommendations outlined are incorporated into the final SEA Determination.

## **4.0 SEA Screening for Draft Variation No. 1 Meath County Development Plan 2021-2027**

A submission has been received from the Environmental Protection Agency (EPA) MH-C1-142-1. The EPA submission recommends a range of guidance documents and resources in relation to the carrying out of Strategic Environmental Assessment Screening and making of a determination in relation to such.

The Chief Executive notes the submission from the Environmental Protection Agency. SEA Screening of the Proposed Variation No.1 to the Meath County Development Plan 2021-2027 has been carried out in consultation with the Environmental Authorities.

The prepared Strategic Environmental Assessment Screening Report accompanied Proposed Variation No. 1 during the display period.

## Appendix 1

Settlement Type	Description	Settlement
<b>Regional Growth Centre (Tier 1)</b>	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
<b>Key Town (Tier 2)</b>	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
<b>Self-Sustaining Growth Towns (Tier 3)</b>	Towns with a moderate level of jobs and services – includes sub-county market towns and commuter towns with good transport links and capacity for continued commensurate growth to become more Self-Sustaining.	Dunboyne Ashbourne Dunshaughlin <sup>5</sup> Kells, Trim

<p><b>Self-Sustaining Towns (Tier 4)</b></p>	<p>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.</p>	<p>Laytown/Bettystown/Mornington/Donacarney Ratoath Enfield Duleek Stamullen Kilcock</p>
<p><b>Towns and Villages (Tier 5)</b></p>	<p>Towns and villages with local service and employment functions.</p>	<p>Towns – Athboy, Oldcastle, Ballivor and Longwood</p>
<p><b>Rural (Tier 6)</b></p>	<p>Villages and the wider rural region</p>	<p>Baile Ghib, Carlanstown, Carnaross, Clonard, Clonee Crossakiel, Donore, Drumconrath, Gormanston, Julianstown, Kentstown, Kilbride, Kildalkey, Kilmainhamwood, Kilmessan, Moynalty, Nobber, Rathcairn, Rathmolyon, Slane, Summerhill</p>