Forward Planning Section,
Meath County Council,
Planning and Community Department,
Abbey Road,
Navan.

08th July 2011

Re. Proposed Amendment Number 1 to the Dunshaughlin Local Area Plan 2009-2015

Dear Sir/Madam,

The National Transport Authority (the “Authority”) submits the following comments on the proposed amendment number 1 to the Dunshaughlin Local Area Plan 2009-2015.

Section 31E(1) of the Dublin Transport Authority Act 2008 assigns the NTA\(^1\) a role in the making of a Local Area Plan. Where a notice is received by the NTA under Section 20, it shall prepare and submit to the relevant planning authority a report on the issues which, in its opinion, should be considered by the planning authority in making, amending or revoking a local area plan. Among other issues, such reports should address, the transport investment priorities for the period of the local area plan and recommendations regarding the optimal use, location, pattern and density of new development taking account of the transport strategy, and recommendations on the matters to be addressed in the local area plan to ensure the effective integration of transport and land use planning.

General Comment

**Phasing**

Dunshaughlin is designated in RPG as a Moderate Growth Town subject to the granting of permission of a railway order for the Navan Rail Line Phase II. It’s current RPG status is a Small Town. The draft GDA Transport Strategy provides for the provision of a new rail line from Navan to join the recently constructed spur to Dunboyne and Pace, for onward travel to Dublin city centre. The timing

\(^1\) As amended by section 30(C) of the Public Transport Regulation Act 2009
of this line construction and the roll out of services will be subject to economic assessment and the timing and scale of development in the Navan area.

It states in Section 11.2 of the proposed amendments to the Local Area Plan that “it is an objective of the Planning Authority to promote the implementation of the Local Area Plan in a rational and sequential manner that is in keeping with the proposed development strategy and to ensure that essential facilities (such as rail,... etc) are secured and in place concurrent with development projects”. It also states in Section 3.1 that the release of lands for development will be linked to “the provision of a new rail route from Pace to Navan, with a station at Dunshaughlin”. The Authority is supportive of this approach.

In order to ensure the effective integration of land use and transport, it is recommended that the Local Area Plan be further amended to clearly demonstrate how the phasing policy will be implemented. It is also recommended that the amended plan includes the quantity of zoned residential lands that would be developed prior to the granting of permission of a railway order for the Navan Rail Line Phase II. To be consistent with the RPG designation of Dunshaughlin as a Small Town (prior to the granting of permission of a railway order), the Authority would envisage that the bulk of zoned residential lands would not be developed until the railway order is granted.

**Core Strategy**

The amount of zoned land in Dunshaughlin is significantly in excess of what is provided for in the draft Meath County Core Strategy up to 2013. It is the Authority’s understanding that primary purpose of the proposed amendment is to address the issue of the Navan Rail Line Phase 2 alignment and that the Local Area Plan will be reviewed following the adoption of the Core Strategy. This should address the consistency of the Dunshaughlin LAP with the draft Meath Core Strategy.

**Density**

The proposed densities in the amended Local Area Plan (Section 3.4: 25 per hectare) may undermine the achievement of a consolidated urban form and is lower than what is provided for in the Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities (DOEHLG, 2008). The Authority recommends that the proposed density in the Local Area Plan and the amount of related allowable development be adjusted to be consistent with Government policy.

**Proposed Eastern Relief Road**

The Authority supports the provision of local access roads for towns to facilitate more sustainable transport provision within the town, providing that such schemes are designed in accordance with the Traffic Management Guidelines and the National Cycle Manual and avoid inappropriately increasing capacity that may encourage longer distance car based commuting. It is critical to ensure that the proposed road scheme free up the existing road network in the town for sustainable modes such as walking and cycling, with the objective of reducing car based transport on the town centre.

Furthermore, it would be desirable that the road be viewed as the boundary to development, thus reducing overall severance for pedestrians and cyclists while providing sufficient lands for the gradual expansion of the town. There are lands currently zoned for development outside of this
boundary. The Authority recommends that the zoning of these lands for development be reconsidered to ensure that this principle is applied.

**Summary of Recommendations**

1) It is recommended that the Local Area Plan be further amended to clearly demonstrate how the phasing policy will be implemented and that the amended Local Area Plan includes the quantity of zoned residential lands that would be developed prior to the granting of permission of a railway order for the Navan Rail Line Phase II. To be consistent with the designation of Dunshaughlin as a Small Town (prior to the granting of permission of a railway order), the Authority would envisage that the bulk of zoned residential lands would not be developed until the railway order is granted.

2) It is recommended that the proposed densities and the amount of allowable development are adjusted accordingly to be consistent with Government policy.

3) It is recommended the amended Local Area Plan includes a policy that ensures that the proposed eastern relief road is designed in accordance with the Traffic Management Guidelines and the National Cycle Manual and ensures the freeing up the existing road network in the town for sustainable modes such as walking and cycling.

4) It is recommended that proposed eastern relief road be viewed as the boundary to development and that lands zoned for development outside of these lands be reconsidered.

I trust the above recommendations of the NTA will be addressed and would welcome the opportunity to discuss, should you have any questions relating to them.

Yours sincerely,

Hugh Creegan

*Director of Transport Planning and Investment*