

**Planning Department,
Meath County Council,
Buvinda House
Dublin Road,
Navan,
Co Meath.**

27th January 2016

Re: Draft Variation (No. 3) of the Meath County Development Plan 2013 - 2019

Dear Sir/Madam,

The Authority welcomes the opportunity to comment on the draft Variation No.3 of the Meath County Development Plan 2013-2019.

The Dublin Transport Authority Act 2008 provides that each planning authority within the GDA shall ensure that their Development Plan is consistent with the NTA Transport Strategy for the Greater Dublin Area. A draft Transport Strategy has been completed, and is currently with the Minister for Transport, Tourism and Sport for his approval.

With regard to the draft variation, the Authority has a number of significant concerns with the proposals set out in the amended text. The Authority is of the opinion that some of the proposed amendments are contrary to the land use and transport planning principles set out in the draft NTA Transport Strategy, and could undermine Government policy aimed at reducing work related commuting by car to 45%.

The Authority is also of the view that some of the proposals set out in Variation No. 3 are contrary to DoECLG policy relating to development on National Roads (Spatial Planning and National Roads Guidelines (2012)), and contrary to the current Regional Planning Guidelines for the Greater Dublin Area.

Settlement Strategy

The Authority has serious concerns over, and does not support, the proposal set out in this Variation to change the designation of Enfield and Stamullen from Small Town to Moderate Sustainable Growth Towns.

Any modifications to the Settlement Hierarchy must be undertaken in a regional context, under the remit of the Eastern and Midlands Regional Assembly. This will guarantee that an appropriate level of analysis can be carried out to ensure that local development demands are considered in a strategic (regional) context, which can weigh up the development potential against the strategic costs of providing increased infrastructural investment (public transport / road capacity etc.). This has not occurred in the present case and, accordingly, we consider that the proposed Variation is not consistent with the Regional Planning Guidelines for the Greater Dublin Area, and by association, not consistent with the draft NTA Transport Strategy.

Recommendation:

The proposed change of the Settlement Status of Enfield and Stamullin is not consistent with the Regional Planning Guidelines for the Greater Dublin Area or the draft NTA Transport Strategy, and should be removed from the proposed Variation.

Land Use Zoning Objectives

The Authority has concerns over the proposed changes to zoning objectives which will reduce the ability to control the types and extent of development on zoned lands. The 'Permitted' and 'Open to Consideration' uses has been expanded for a number of zoning types. While this can allow for flexibility in development, this can result in a mismatch of land use types which can make it difficult to deliver an appropriate range of transport options to an area. This can result in unsustainable development. Maintaining tighter control on the location of new development is critical to ensure that the future build out of County Meath is delivered in a planned and managed way. This is fundamental to the principle of proper planning and sustainable development.

In particular, the Authority has a serious issue with the re-categorisation of 'White Lands', where the proposed wording will favour the presumption that lands can be developed as required. This is contrary to the principles of proper planning and sustainable development.

Recommendation:

The Authority requests that the revisions to the Zoning Objectives are reviewed to ensure that the matrix of permitted uses does not facilitate inappropriately located development which would not be in accordance with good planning practice and would undermine the principles of the draft NTA Transport Strategy. The revisions to 'White Lands' should be removed from the Variation.

Phasing of Employment Zoned Land

The phasing of employment zoned land was introduced in the 2013 Development Plan with the aim of ensuring the most appropriate build out of development. The removal of this phasing element will remove the requirement for a more sequential approach to the development of each settlement. This could lead to unsustainable land use patterns, which will increase the costs of public infrastructure and reduce the potential for the provision of sustainable transport options. The Authority views the removal of the phasing objectives pertaining to employment zoned lands throughout the County as a retrograde step, and contrary to the principles of land use and transport integration, including those set out in the draft NTA Transport Strategy.

Recommendation:

The Authority requests that the phasing objectives set out in the Development Plan are maintained to ensure consistency with the principles of the draft NTA Transport Strategy.

Economic Development Strategy & 'Framework Plan' Requirements

It is acknowledged by the Authority that Meath County Council has a responsibility to implement the findings of the Economic Development Strategy for County Meath 2014-2022, and as such is required to integrate relevant aspects of that strategy into the current Development Plan. The Authority notes however, that it was not party to any discussion or consultation on the Economic Development Strategy, or on the subsequent corresponding proposals prior to the publication of the draft Variation No. 3 of the County Development Plan.

Similarly, the Authority notes reference to a *'Strategic Framework Guidance document for the entire Dunboyne Clonee area which has been prepared in 2015 to provide long term strategic guidance for the overall development of the area'*. The Authority has not been consulted on, nor is aware of this document or its finding, which are not set out in the text or supporting documents of Variation No.3.

Furthermore, the Authority notes the proposals in the Variation to replace all proposed 'framework plans' with developer led 'master plans'. The Authority has significant concerns over the role of such non-statutory plans, prepared by an applicant, to provide a plan lead approach to development. It is critical for the sustainable long term development of both County Meath and the Greater Dublin Area that significant land use development is planned, and supported by an appropriate level of supporting information / analysis. This will ensure that the development proposals are appropriate, consistent with statutory planning policy (including transport policy), and will complement existing and future infrastructural provision. In this regard, the Authority would stress the need to ensure that development planning is coordinated by the Local Authority in conjunction with relevant third parties, such as the NTA, TII, and Irish Water etc.

Recommendation:

To ensure consistency with statutory planning policy, including the draft NTA Transport Strategy, the Authority strongly recommends that the proposal to use 'developer led Mater Plans' to guide future development is removed from the proposed Variation. Instead, the Authority requests that Meath County Council commit to ensuring that development planning is coordinated by the Local Authority in conjunction with relevant third parties, such as the NTA.

Lands at Dunboyne North

The Authority has consistently held and expressed its concern with substantial development proposals at Pace (Dunboyne-North). It is the view of the Authority that future employment development in this area should be focused on Dunboyne/ Dunboyne Rail Station rather than at the Pace motorway interchange.

The Authority does not agree with the proposals for Dunboyne North set out in the draft Variation No. 3, which have not been supported by any detailed analysis. The Authority is of the opinion that the proposed 'sustainable live work community' has not been substantiated, and could have significant implications on the function of the strategic road network, as well as undermining the principles and targets of the draft Transport Strategy and Government Policy (Smarter Travel) aimed at reducing the level of commuting by car to 45%.

It is noted that the draft Variation No. 3 will remove the SDZ designation of the lands at Dunboyne North. The Authority also notes with concern that the draft Variation No. 3 has proposed the deletion of the reference and commitment to *'review the nature, location and quantum of lands zoned for employment uses to the east of the M3 Motorway / R147 (former N3) at Dunboyne/Clonee'* as well as removing the commitment to *'undertake an integrated land use and transportation assessment in consultation and agreement with stakeholders including the NTA, NRA(TII) and Iarnród Éireann to determine the future direction of sustainable growth in the Dunboyne / Clonee corridor'*. It is proposed that these elements will be replaced with the preparation of a *'developer led Master Plan for the North Dunboyne Area'*.

The Authority recognises that an SDZ is not the only delivery mechanism which could be used for the future development of lands at Dunboyne. However the statutory planning process required for an SDZ scheme would ensure that any future development would be undertaken in a plan led sustainable manner, and ensure that transport infrastructure was used efficiently, and without adverse effect on the strategic road network. Based on the facts summarised above, the Authority is not convinced that the revisions set out in Variation No.3 for Dunboyne will ensure that development is delivered in a sustainable and appropriate manner. In this regard it is considered that the proposals are not compliant with the requirements of the DoECLG Spatial Planning and National Road Guidelines (2012).

Recommendation:

The Authority views the proposals as set out in Variation No.3 in relation to Dunboyne- North as inconsistent with the draft NTA Transport Strategy, and recommends their removal. The Authority reiterates that any revised development proposal for this area must be framed by a plan commissioned and prepared under the supervision of the local authority, with input from statutory third parties.

Zoning of additional lands for Employment Generating Uses – Clonee – Portan

In a similar vein to the proposed changes for lands at Dunboyne-North, the Authority considers the proposal to zone a significant amount of additional employment zoned lands at Clonee-Portan premature, on the basis that no substantiating evidence-based plan or analysis has been presented to support the change.

Recommendation:

The Authority requests that the proposals in relation to Clonee-Portan are reconsidered, and any revised development proposal is framed by a plan commissioned and prepared under the supervision of the local authority, with input from statutory third parties. This will ensure that any future development is consistent with the principles of the draft NTA Transport Strategy and other relevant policies.

Review of Development Management Objectives

The Authority notes the proposal to amend the Development Management Objectives in relation to car parking at commercial developments. This current Development Plan sets non-residential car parking standards as “maxima” standards, which is in line with the objective of the draft NTA Transport Strategy that ‘*All non-residential development proposals in the GDA should be subject to maximum parking standards and based on public transport accessibility*’. The proposed amendment will open the parking standards to deviation from the maxima standards based on end user requirements. The Authority is strongly opposed to this modification, which is inconsistent with the draft NTA Transport Strategy.

It is critical for the long term sustainable development of areas, and the promotion of public transport, walking and cycling, that parking is managed appropriately, and in particular that parking is not oversupplied. This is best achieved by applying strict maxima parking standards, ideally at a regionally defined standard. Where a development requires additional parking capacity above that of the maxima local authority standard, it is likely that the development is located at a sub optimum location, and therefore not appropriately located. Providing additional car parking is not a sustainable solution to this problem.

Recommendation:

The Authority strongly opposes this variation which is not consistent with the NTA Transport Strategy. This Authority requests that this proposed amendment in relation to parking (p.74) is removed.

I trust that the views of the Authority will be taken into consideration.

Yours sincerely,



Hugh Creegan

Director of Transport Investment and Taxi Regulation