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**Planning Department,
Meath County Council,
Abbey Mall,
Abbey Road,
Navan,
Co Meath.**

24th January 2014

Re: Draft Variation (No. 2) of the Meath County Development Plan 2013 - 2019

Dear Sir/Madam,

The Authority welcomes the publication of the draft variation of the Meath County Development Plan 2013-2019, as it will provide a framework for the long term spatial development of the County. In particular, the Authority supports the sequential approach to the development of residential zoned land proposed in the draft Plan, whereby, inter alia, residential zoned lands, closest to town centres/public transport, have been prioritised for development. However, there are a number of issues of concern that the Authority raises in this submission in relation to the proposed variation:

1. Development at Pace

The Authority has consistently expressed its concern with substantial development proposals at Pace, as provided for in the Dunboyne/ Clonee/ Pace LAP. 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.

Accordingly, and in the absence of an agreed integrated land use and transport plan which determines the future location and appropriate scale of development in the Dunboyne/ Clonee/ Pace area, the Authority wishes to record its objection to the inclusion of the following objectives in the proposed variation:

- CER Pol 1 (Lands at Piercetown)
- Pace Obj 1
- CER OBJ 1 (Future Gateway Building)
- CER OBJ 2 (Lands at Portan, Clonee)

The Authority also considers that the land use objective Pace OBJ 2 (*“To provide for strategic employment use predominantly for high end office development on lands adjacent to the emerging preferred location for the Level 2 Centre at pace on a phased basis within the life of the County Development Plan.....”*) is inappropriate and should be omitted. This proposal is contrary to the Authority’s policy contained in the Integrated Implementation Plan 2013-2018 which states that *“high volume, trip intensive developments, such as office and retail, should primarily be focussed into Dublin City Centre and the larger Regional Planning Guidelines (RPG) higher order centres within the Greater Dublin Area”*.

Recommendation:

It is recommended that CER Pol 1, Pace Obj 1, CER OBJ 1 and CER OBJ 2 are amended to make these objectives conditional on their consistency with an agreed integrated land use and transport plan.

It is recommended that Pace OBJ 2 be deleted.

2. Stamullen Employment Zoning

Land use objective LU OBJ 2 of the Stamullen Written Statement provides for the employment zoning of 16.1 hectares in Phase I, developed in accordance with an approved Framework Plan as per LU OBJ 2. The Authority considers that economic development in Stamullen/ Gormanstown is dependent on the delivery of a deep-water port on the east coast. Pending the progression of that project, it is premature to provide for development of these areas in the short term.

The Regional Planning Guidelines does not specifically designate Stamullen in the settlement hierarchy. The RPGs states that economic investment opportunities should be considered and supported where sustainable and in keeping with the size and services of the town. Any change to the designation of Stamullen should only be considered through any future review of the current RPG settlement strategy.

Recommendation:

It is recommended that any further development of employment lands at Stamullen be conditional on the delivery of a deep-water port on the east coast and any changes to the status of Stamullen in the Regional Planning Guidelines.

3. Maynooth Employment Zoning

The Authority considers that any proposal to locate intensive office based development in Maynooth Environs is inconsistent with the Authority’s policy on the location of employment, as presented in the Integrated Implementation Plan 2013-2018.

Recommendation:

The Authority requests that the text of the Maynooth Environs Written Statement be amended to exclude high volume, trip intensive developments in the Maynooth Environs.

4. Clonard, Summerhill, Longwood, Kilbride, Crossakiel, Athboy, Carlanstown, Carnaross, Nobber, Oldcastle, Rathcairn, Kentstown, Slane, Ballivor, Enfield Employment Zoning

The Authority recognises Meath County Council's support for economic development, through the expansion of existing employment. However, the expansion of these areas should be conditional on this expansion being consistent with regional policy (see RPG strategic recommendation ER3) and with the Authority's policy on the location of employment (as set out in the Integrated Implementation Plan 2013-2018). The scale of employment zoning in all these settlements does not appear to be commensurate with their RPG designation.

Recommendation

It is recommended that employment zoning in these settlements should be commensurate with their scale of RPG settlement designation, whilst supporting the expansion of existing businesses in these locations.

5. Dunshaughlin and Ratoath Road Objectives

The Authority would query the requirement for the proposed major distributor roads for Dunshaughlin and Ratoath (see Land Use Zoning Maps). The Authority requests that alternative solutions such as traffic management or demand management measures be considered prior to the provision of expensive road infrastructure. In relation to Dunshaughlin and Ratoath, a local transport plan should address the need for these major distributor roads.

Recommendation

The Authority recommends that an extra condition should be included in the Meath County Development Plan to ensure that the need for the proposed major distributor roads will be addressed in local transport plans for Dunshaughlin and Ratoath.

6. References to Córas Iompair Éireann

References to Coras Iompair Eireann in the text of the variation should be amended to read National Transport Authority.

The National Transport Authority requests your consideration of the above comments.

Yours sincerely,



Hugh O'Regan
Director of Transport Investment and Taxi Regulation