

06 March 2020

Draft Meath County Development Plan 2020-2026, Planning Department, Meath County Council, Buvinda House, Dublin Road, Navan, Co. Meath C15 Y291

Re: Draft Meath County Development Plan 2020-2026

A Chara,

Thank you for your authority's work in preparing the draft Meath County Development Plan 2020-2026 (the draft plan).

The Office of the Planning Regulator (the Office) wishes to acknowledge the considerable and evident work your authority has put in to the preparation of the draft plan against the backdrop of an evolving national and regional planning policy and regulatory context, which included taking account of the National Planning Framework (NPF), the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Regional Assembly area and the establishment of the Office mid-stream in the gestation of the draft plan.

In particular, the Office notes and welcomes the overall approach of your authority in the preparation of the draft plan and in addressing the NPF and the RSES in accordance with section 12 of the Planning and Development Act 2000, as amended (the Act).

The Office has evaluated and assessed the proposed draft, above, under the provisions of sections 31AM(1) and (2) of the Act.

As your authority will be aware, one of the key functions of the Office includes assessment of statutory plans and strategies to ensure consistency with legislative and policy requirements relating to planning.

The Office is currently finalising an overall evaluation and assessment methodology for statutory plans. The submission below has been prepared in line with the methodology above and is intended to provide a strategic level input to your authority in finalising the draft plan.

1. Matters within the scope of section 10 and section 10(2)(n)

Section 10(2)(n) Climate Action: This section of the Act relates to mandatory objectives for the promotion of sustainable settlement and transport strategies in urban and rural areas, including the promotion of measures to reduce energy demand and greenhouse gas (GHG) emissions and to adapt to climate change, having regard to, in particular, the location, layout and design of new development.

Recognising that the manner of addressing climate change in statutory development plans is the subject of ongoing policy development including the introduction of a climate assessment toolkit under Action 65 of the Government's Climate Action Plan and forthcoming updates to statutory guidelines published by the Minister on the preparation of development plans, the Office acknowledges and commends the efforts that your authority has made in including the contents and objectives in Chapter 10 - the Climate Change Strategy.

At the same time, given the evolving nature of the policy context above, it would be prudent for your authority to include an objective in the draft plan to the effect that an assessment will be undertaken of the implications of the introduction of such future policy mechanisms, with a view to varying the plan as made to ensure consistency with relevant climate assessment and development plan guidelines.

Observation 1:

Updated Development Plan Guidelines for Planning Authorities are likely to be published by the Minister subsequent to the making of your development plan. Your authority is advised to include an objective that the implications of such guidelines, particularly as they relate to the consideration of climate aspects within the meaning of section 10(2)(n) of the Act would be subject to detailed assessment with a view to incorporating their requirements into the development plan by way of a variation within a reasonable timeframe after the publication of

the guidelines and any other relevant policy context and to ensure broad consistency with same.

The Office considers that the draft plan will have, subject to the following, positive impacts in terms of energy reduction and greenhouse gas (GHG) emissions reductions as required by section 10(2)(n) for new development.

A key policy lever available to planning authorities in relation to the above is in relation to influencing development patterns and transportation choices such that they not only aspire to but actively deliver significant modal shift from private transport to active modes (walking and cycling) and sustainable modes (bus and rail) in relation to both new development and existing built-up areas.

Given the statutory and policy requirement for plans to deliver demonstrably greater mobility by walking, cycling, rail and bus, it would be appropriate for the movement strategy in the draft plan to address policies and objectives for the different modes in that order. This would serve to demonstrate to the various stakeholders in the development plan process the importance and priority placed on providing for and facilitating active and sustainable modes in the development plan.

Observation 2:

The Office welcomes the approach to climate action included in your authority's draft plan, and also the associated proposals concerning transport under the proposed Movement Strategy. The Design Manual for Urban Roads and Streets (2013; revised 2019) (DMURS), recommends that in order to encourage more sustainable travel patterns and safer streets, designers must place pedestrians at the top of the user hierarchy and prioritise the design for transport modes in that order (section 2.2.2 User Priorities).

Therefore, your authority is requested to reconsider the order in which transport modes are considered in the Movement Strategy, consistent with the recommended road user priorities, in order to more clearly demonstrate the priority given to sustainable active modes (walking and cycling modes) and other sustainable passive modes (mass transit modes, including rail and bus).

Observation 3:

Regarding the implementation of DMURS, the Office welcomes the inclusion in your draft plan of objective DM OBJ 25 requiring new residential development to be designed in accordance with DMURS, which will play a crucial role in promoting sustainable transport modes and therefore in implementing effective climate action.

However, the Office notes the references in the draft plan (p.49) which indicate only that the manual must be <u>taken into account</u> by the planning authority when permitting or planning development. Under DMURs, local authorities have been tasked with the implementation of the principles, approaches and standards to road and street design set out in the Manual in carrying out their development planning functions under the Planning Code. Your authority is therefore requested to amend this and any such references in the plan to ensure the plan is consistent with the requirements of the DMURS.

Whilst a key priority for the draft plan (section 5.1) is the development of a sustainable transport system and promoting measures to increase the use of public transport, while also increasing the modal share for walking and cycling in towns and villages across the County, it would appear that the draft plan does not provide baseline figures for the existing modal split for existing settlements.

Including baseline figures would enable your authority to set achievable targets for modal change for individual settlements (e.g. for Drogheda and Navan, including as part of the Local Transport Plans) and/or by settlement type (self-sustaining growth towns, etc.). Inclusion of baseline figures and targets for modal share would also form a basis for effective monitoring in the implementation of your authority's Movement Strategy and its Climate Change Strategy, highlighting where implementation needs to be stepped up or addressed in subsequent reviews of the development plan.

Your authority will be aware that there is existing baseline data for modal share for small areas through the POWSCAR data, which can be applied to the various settlements. Realistic targets for modal share for each settlement can then be set based on the objectives for sustainable settlement and transport strategies under the development plan. The National Transport Authority (NTA), Transport Infrastructure Ireland (TII) and the Department of Transport, Tourism and Sport (DTTaS) would be well positioned to advise your authority in this regard.

Recommendation 1:

The Office notes and welcomes the Movement Strategy included in your authority's draft plan, a key priority of which is the development of a sustainable transport system and the promotion of measures to increase the use of public transport, while also increasing the modal share for walking and cycling in towns and villages across the County. As noted above, the Movement Strategy will play a key role in implementing the Climate Change Strategy under the draft plan and will assist your authority it meeting its objectives under section 10(2)(n).

In order to ensure the effective planning, implementation and monitoring of your development plan objectives under section 10(2)(n), your authority is requested, in consultation with the NTA (and TII and DTTaS) as appropriate) to include:

- (i) Appropriate existing baseline figures for modal share. It is advised that this could best be provided at individual settlement level for the higher order settlements, and at aggregate level for rural villages and the open countryside, as identified in the Core Strategy.
- (ii) Realistic targets for modal change against the baseline figures provided under (i), above, to form a basis for an effective monitoring regime for the implementation of your authority's Movement Strategy and its Climate Change Strategy.

Section 10(2A) Core strategy: The Office is generally satisfied that the core strategy and settlement strategy broadly responds to the requirements of the legislation under section 10(2A). However, as set out below, the following matters need to be more fully addressed or justified in the draft plan, as required by the legislation.

Section 10(2A)(a): Whilst the draft plan does refer to the *Urban Development and Building Heights Guidelines for Planning Authorities* (2018) in its settlement and housing strategy and does include policy and objectives pertaining to Specific Planning Policy Requirement 1 (SPPR1) and building height in its development management standards, the draft plan does not appear to provide clear information in its overall core strategy to show that the plan and housing strategy are consistent with the SPPRs of the said guidelines, in addition to SPPRs in other section 28 guidelines.

In this regard the draft plan could more fully demonstrate consistency with SPPR 1 and does not explicitly address SPPR 2, SPPR 3 or SPPR 4. Nor does it address SPPRs 1-9 under the *Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities* (2018).

Recommendation 2:

In accordance with section 10(2A)(a) your authority is requested to provide relevant information to show that the proposed development plan and housing strategy are consistent with the specific planning policy requirements (SPPRs) specified in the 'Urban Development and Building Heights Guidelines for Planning Authorities' (2018) and the 'Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities' (2018). **Section 10(2A)(c):** The draft plan does not appear to include information in relation to the quantity in hectares and potential housing delivery on windfall sites within existing residential zoned areas and mixed residential/other uses zoned lands. The Office acknowledges that estimating this level of yield can be difficult and is subject to change but an analysis of your authority's records of past development trends would be a good starting point.

This information is necessary to enable the Office, or other parties, to determine change in land use zoning between the current and the draft plan, and to determine the change in capacity of zoned lands to accommodate residential units, having regard to the implementation of the national policy objectives and regional policy objectives of the NPF and RSES, respectively.

Recommendation 3:

In accordance with section 10(2A)(c), the planning authority is requested to quantify in hectares the proposed number of housing units in respect of existing residential zoned land and land zoned for a mix of residential and other uses.

Section 10(2A)(d): The draft plan is required to measure the extent of lands proposed to be zoned for residential use or for a mixture of residential and other uses under the development plan and to provide details of how the zoning proposals accord with national and regional policy objectives that the development of land shall take place on a phased basis, within the life of the proposed plan¹.

Whilst the draft plan does identify lands as a strategic reserve for future development beyond the period of the plan, this is outside the scope of section 10(2A)(d).

This information will be important in demonstrating consistency between the extent of lands zoned to accommodate the population growth proposed under the core strategy in view of said national and regional policy objectives, in particular for higher order settlements, that is self-sustaining towns and above.

Moreover, any phasing objectives should promote the development of residential and mixed residential lands closest to the centre of a settlement and/or closes to key transport infrastructure, for example lands adjacent to Dunboyne train station and/or within easy reach of the centre of Dunboyne.

¹ Note, the DHPLG Guidance Notes on Core Strategies (November, 2010) clarify that the phasing refers to the particular plan period.

Recommendation 4:

In accordance with section 10(2A)(d), and having regard to the quantity of lands zoned for residential development, lands zoned for a mixture of residential and other development, and the proposed number of housing units to be accommodated, in the individual settlements, your authority is requested to demonstrate that objectives relating to the order or priority of development (or phasing) of lands accords with the principle of the sequential approach contained in the statutory guidelines published by the Minister on Development Plans (2007).

The phasing proposals should demonstrate that the development plan will include effective mechanisms to ensure that zoned land in sequentially favourable locations will be prioritised over less favourably located lands over the period of the proposed development plan.

The Office notes the inclusion of a strategic reserve of zoned residential lands which, according to objective CS OBJ 7, will not be available for development until after 2026. Given the nature, extent and location of the lands concerned, the wording of objectives CS OBJ 7 and SH OBJ 4 would benefit from additional clarity to make clear that such lands will not be considered for development under the lifetime of the proposed development plan. The development of such lands during the period of the proposed plan would not be consistent with national and regional policy objectives concerning compact growth and would be inconsistent with the core strategy proposed under the draft plan.

Recommendation 5:

Your authority is requested to clarify the specific wording of objectives CS OBJ 7 and SH OBJ 4 to make clear that no residential development proposals will be considered by the planning authority, or by An Bord Pleanála, on lands identified as being 'Post 2026' until after the full lifetime period of the development plan 2020-2026.

Section 10(2A)(f): The draft plan sets out a settlement hierarchy and provides the details required under (i) – (ix). The provisions under sections 10(2A)(g) and (h) do not apply. The information required under (2A)(f) is represented in the draft plan by a diagrammatic map as required under (2B).

However, having regard to the differentiation of the legislation between settlements of 1500 population or more from lower order settlements, the reasoning for placing of Ballivor (population 1,809) and Longwood (1,581) as village settlements rather than in the small town tier, is unclear and would appear to be inconsistent with the statutory requirements.

Furthermore, the Office notes that the legislation, under section10(2A)(f)(vi), requires <u>aggregate</u> projected population (i) for villages and smaller towns fewer than 1,500 persons and (ii) for open countryside outside of villages and towns. The draft plan includes detailed figures under the Core Strategy (table 2.12, refers) for the two said geographical areas. There would be scope for your authority to reconsider its approach to this issue in this regard to allow for a greater degree of flexibility in how the future development of groups or smaller settlements is managed and monitored.

Recommendation 6:

Having regard to the provisions of the legislation concerning the core strategy under section 10(2A)(f)(vi), your authority is requested to:

- (i) include Ballivor and Longwood as small towns, given that they exceed the 1500 population threshold;
- (ii) revisit the inclusion of detailed figures in the core strategy for individual villages and smaller towns fewer than 1,500 persons to allow for a greater degree of flexibility in how the future development of groups or smaller settlements is managed and monitored.

The Office suggests that this revised approach will best assist the planning authority in devising a Core Strategy in accordance with the legislative requirements, the national and regional policy requirements and the requirements of section 28 guidelines, and in particular in view of the restrictions on population growth that apply under NPO9 of the NPF.

2. Consistency of proposed plan with the hierarchy of statutory plans

Compact growth - Settlement hierarchy: As noted above, the proposed core strategy is generally consistent with the NPF and RSES concerning overall population growth to be accommodated over the period of the development plan, having regard to National Policy Objectives (NPOs) 1a, 1b and 1c.

In particular, it supports the growth strategy for Drogheda under the RSES to grow to a population of 50,000, in line with the provisions of the NPF (NPO2b refers) which designate Drogheda as a Regional Growth Centre. It also provides for the planned growth of the Dublin Metropolitan Area (as provided for under NPO67 and NPO68).

The RSES defines a settlement strategy for the region consistent with the objectives of the NPF, confirming the two upper tiers (cities and regional growth centres), designating the next tier (key towns) and defining the lower tier (self-sustaining growth towns, self-sustaining towns, towns & villages, and rural). It requires the hierarchy of settlements to be determined by the planning authority in accordance with the hierarchy under the RSES and in line with the guiding principles and typology of settlements set out under RSES (RPO 4.1).

The Office notes that the Eastern and Midland Regional Assembly (EMRA) has raised a concern with the designation of Ashbourne as a self-sustainable growth town, in terms of its low employment base (jobs ratio of 0.31). The settlement is identified in the RSES (section 4.7) as a town representative of the self-sustaining town typology, with a requirement for contained growth, focused on driving investment in services, employment growth and infrastructure and balancing housing delivery. The Office would also conclude that a focus on consolidation and improvement of the employment base of the town, as a self-sustaining town would be an appropriate response in the core strategy.

Observation 4:

In view of the low employment base (resident workers : jobs ratio of 0.31) of Ashbourne and the provisions of RPO 4.1 of the RSES, your authority is requested to reconsider the positioning of and justification for the settlement as a self-sustaining growth town within the settlement hierarchy. The approach required under RPO 4.1 would suggest that the settlement would fall within the scope of a self-sustaining town where the focus would be on driving investment in services, employment growth and infrastructure and balancing housing delivery.

The Office also notes the objective of the draft plan (SH OBJ 11) to continue to support the transition of Ashbourne towards a Metropolitan Settlement. Ashbourne is located in the core area of the Eastern and Midland Regional Assembly area, outside and at a distance from the defined Metropolitan Area Strategic Plan (MASP) of Dublin. Retaining the proposed objective would undermine the settlement strategy under the NPF and RSES.

Observation 5:

Having regard to the location of Ashbourne outside and at a distance from the Dublin MASP boundary, the Office would advise your authority to omit reference in the draft plan to Ashbourne as, or as transitioning to, a metropolitan settlement, which is inconsistent with the provisions of the RSES as adopted by the Assembly.

In terms of managing overall population growth to 2040 in a way that enables social and physical infrastructural delivery to keep pace in the interests of sustainable communities, NPF NPO9 determines a level of 30% to be appropriate except for settlements identified under NPO2a or NPO2b of the NPF (such as Drogheda Regional Growth Centre), or those otherwise agreed through the RSES (such as Navan key town).

In tandem, NPO7 requires a tailored approach to urban development with a particular focus on, inter alia, encouraging population growth in strong employment and services centres, reversing the decline of smaller centres, addressing the legacy of rapid unplanned growth, and supporting a continuation of balance population and employment growth.

The purpose of NPO9 and NPO7 is to ensure the satisfactory coordination of residential growth commensurate with the available capacity of relevant existing or planned facilities, services and employment opportunities, on a planned basis, with higher growth rates agreed for a limited number of settlements coordinated with higher levels of investment in infrastructure and services to support same.

The implementation of NPO9 is a key element to ensure the overall implementation of compact growth, including the consolidation of development within the five cities and the regional growth centres, in addition to the key settlements identified in the RSES. Whilst the draft plan provides for 50% growth for Drogheda, only 17% growth is proposed for Navan, whereas greater growth is allowed for under RSES.

A review of the proposed population growth provided for each of the settlements under the core strategy identifies a number of settlements that the draft plan would seem to suggest will grow well in excess of the national and regional parameters set out under NPO9 to ensure a sustainable level of growth and commensurate infrastructure provision.

Of the higher order settlements, Dunboyne is projected to grow by 45% and Dunshaughlin by 54% by 2026. For Dunshaughlin, table 2.12 of the draft plan would seem to indicate that much of this population growth has already taken place, with 470 units already completed up to 2019 and 1156 extant units not yet built. In effect, the progression of development in Dunshaughlin would already appear to be exhibiting characteristics and quantities that have already overtaken the growth rate anticipated in the NPF/RSES.

It would appear that such a growth strategy is being influenced by the objective to secure investment in new public transport services such as the previously proposed Navan rail line project. Subject to the wider content of this submission, it would be more appropriate to qualify the realisation of such growth aspirations in full or in part with reference to planned and committed public transport investment.

Recommendation 7:

NPO9 requires that in each Regional Assembly area, settlements not identified in Policy 2a or 2b of the NPF may be identified (such as Navan and Maynooth) for significant (i.e. 30% or more above 2016 population levels) rates of population growth at regional and local planning stages, provided this is subject to:

- Agreement (regional assembly, metropolitan area and/or local authority as appropriate);
- Balance with strategies for other urban and rural areas (regional assembly, metropolitan area and/or local authority as appropriate), to ensure that the totality of planned population growth is in line with the overall growth target; and
- A co-ordinated strategy that ensures alignment with investment in infrastructure and the provision of employment, together with supporting amenities and services

In order to ensure coordination of residential growth and relevant facilities, services and employment and to avoid unbalanced communities and adverse impacts on the quality of life of existing and future residents is it important that your authority provides for appropriate population growth rates in the Core Strategy in accordance with the NPF and the RSES.

In this regard the Office does not see effective alignment in the Core Strategy for a number of settlements, including, inter alia, Dunshaughlin and Dunboyne which are projected to grow by 54% and 45%, respectively, to 2026.

Your authority is therefore requested to address the requirements of NPO9 under your Core Strategy.

Compact growth – scale of population growth: For many of the smaller rural village settlements the growth provided for would also appear to be significantly higher than the 30% provided for under the NPF, notwithstanding that the individual anticipated development levels are modest and need to be considered against low level starting points. For example, the village of Kilbride (population 87 persons), a short distance from the border with Fingal County Council area, is proposed to increase by 86%; and Baile Ghib village (population 81) by 62%. Rathmolyon (population 334) is proposed to increase by 67%.

For these smaller settlements, there is a justification for appropriately scaled local development to secure sustainable alternatives to housing provision in countryside areas that contain many natural and cultural assets and that have been under sustained pressure for development.

In this regard, the Office notes and strongly supports (section 2.4.3 of the draft plan) the intention to focus on investment in rural towns, villages and rural nodes to combat decline and to implement the 'new homes in small towns and villages' initiative (NPO18b) alongside the regeneration of vacant and underutilised sites.

Notwithstanding the above, a key issue for the implementation of the plan will be to ensure that village development does not attract car-based commuter type demand given proximity to the city and that there is the relevant infrastructure (water, wastewater treatment, etc.) available to accommodate the projected growth, particularly in view of your authority's objectives (under section 10(2)(cb)) to promote compliance with relevant environmental standards and objectives.

In this regard, the provisions of the draft plan should be closely aligned to and supported by the wider roles of Meath County Council in sustainable rural and community development, for example combining public housing programmes and the implementation of NPF NPO18b in activating housing delivery in smaller rural locations in a way that responds to the requirements of local communities.

Recommendation 8:

Having regard to the provisions of, inter alia, NPO7 and NPO9 of the NPF, your authority is requested to demonstrate how high % growth assumptions for villages under the Core Strategy are consistent with the likely availability of physical and social infrastructure and services within the plan period and to demonstrate appropriate safeguards against any potential for poorly serviced development.

Compact growth – Regeneration & Renewal: It is an objective of the NPF (NPO3c) that 30% of all new homes be delivered within the existing built up footprint of settlements (other than the five cities where 50% applies). This is supported by several other objectives under the NPF, including, inter alia:

• NPO6 to regenerate and rejuvenate settlements of all types and scale with increased residential and employment activity;

- NPO7 to apply a tailored approach to urban development to include population growth, reversing stagnation or decline in smaller centres and providing for catch-up facilities and services, jobs and transport links for recently rapidly expanded commuter settlements; and
- NPO13 requiring planning and related standards (building height, car parking) in urban areas to be based on performance criteria in order to achieve targeted growth.

These objectives are refined and elaborated upon by the RSES through 258 Regional Planning Objectives (RPO), including a number relating to the growth strategy for the region. In particular, the RSES requires core strategies to set out measures to achieve the 30% compact growth target (RPO 3.2) and to identify regeneration areas within existing urban settlements and provide objectives to deliver urban infill and brownfield regeneration sites in line with the guiding principles set out for core strategies in the RSES (RPO 3.3).

The core strategy commits to the delivery of compact growth (section 2.9.6) and recognises the social and economic benefits of the redevelopment of brownfield lands, in particular in relation to urban regeneration in towns and villages throughout the county.

The Office notes and welcomes that your authority has estimated that there is potential to deliver 6,272 residential units on infill and brownfield sites, equating to 31% of household allocation for the county (14,079 units on greenfield). The draft plan includes a number of supporting objectives in this regard (CS OBJ 4 and CS OBJ 5).

In terms of measures to achieve compact growth, the draft plan indicates that the delivery of housing will be supported through the implementation of an *Active Land Management Strategy* (ALMS) for the County in addition to the promotion and identification of infill and brownfield sites for redevelopment (and strategically located green field sites) that would support the principles of consolidated growth.

The draft plan explains that the ALMS will entail:

- Continued proactive implementation of the Vacant Site Levy;
- Identification of opportunity/under utlilised lands;
- Identification of potential constraints inhibiting the development of zoned lands; and
- Ongoing monitoring of the implementation of Planning permissions.

Whilst these measures are welcomed, the Office suggests that it would be appropriate for the planning authority to include a clear objective to implement the ALMS approach under the development plan. It would also be appropriate, in order to ensure effective implementation, to set out a clear time line and strategic approach to carrying out the ALMS approach and to set

measurable targets (perhaps by settlement at the upper levels) and timelines against which the implementation can be monitored and measured.

Observation 6:

Your authority should:

- (i) include a clear objective to implement the Active Land Management Strategy approach under the development plan; and
- (ii) set out a clear time line and strategic approach to carrying out the Active Land Management approach and to set measurable targets (perhaps by settlement at the upper levels) and timelines against which the implementation can be monitored and measured.

Compact growth – Housing Demand: There would appear to be scope for a greater level of consistency in the draft plan between its core strategy and the objectives to implement compact growth. Whilst the quanta of population growth proposed under the core strategy is generally consistent with the populations targets under the NPF and RSES (the requirements of section10(2A)(b) of the Act, refer), the evidential basis for overall housing demand calculations under the plan, derived from assumptions such as occupancy ratios could be made clearer, which may have implications for the subsequent approach to land use zoning for residential and mixed-residential lands.

For example, the draft plan indicates that in projecting housing demand to 2026 (section 2.9.5) an occupancy rate of 2.5 for the county (decreasing from 3 in 2016), would be appropriate resulting in a total demand of 91,000 units for a population target of 227,500.

The RSES indicates that the region has an average occupancy rate of 2.8, but ranges from 2.5 in Dublin and 3 in the surrounding counties. The NPF notes the average household size for the state is 2.75 and is expected to drop to 2.5 by 2040.

Having regard to the above, the evidential basis for the application of a rate of 2.5 does not appear to be clear. Moreover, a closer examination of the core strategy under table 2.12 would seem to show that the occupancy rate applied varies widely between settlements (above village level). Except for Kilcock, which applies an occupancy rate of 2.8, and the rural villages which generally apply 2.5 (3.3 applied to Clonee and 1.4 to Kentstown), a much lower rate has been applied to all settlements from towns to the regional growth centre.

The use of excessively low housing occupancy rates artificially increases the overall housing demand for the county and therefore the total quantity of land required to be zoned for residential and mixed-residential uses to accommodate the projected population.

Recommendation 9:

- (i) Your authority is requested to provide more clarity on the basis for occupancy rate applied in the devising of your Core Strategy, as detailed in table 2.12. The RSES indicates that the region has an average occupancy rate of 2.8, but ranges from 2.5 in Dublin and 3 in the surrounding counties. The NPF notes the average household size for the state is 2.75 and is expected to drop to 2.5 by 2040.
- (ii) In view of the national and regional policies for compact growth it is essential that your core strategy, population growth rate and housing demand calculations are supported by a justified housing occupancy rate for the county as a whole, or by settlement type where appropriate. Your authority should justify the approach applied in the devising of the core strategy, and/or amend the core strategy and housing demand figures accordingly, as appropriate.
- (iii) Should any revisions to the core strategy arise under point (ii) of this recommendation, your authority is required to revisit the approach to zoning for residential use and for a mixture of residential and other uses, as necessary to accommodate the overall reduced housing unit demand consistent with the requirements of compact growth. Without prejudice to the approach to be proposed by your authority, the application of phasing in accordance with the sequential approach may be appropriate.

Compact growth – land use zoning: The core strategy, as set out in table 2.12 includes the figure for quantum of zoned land for each settlement. However two issues would seem to arise.

Firstly, the quantum of zoned land relates only to residential land and not, it would appear, to mixture of residential and other uses (including mixed use masterplan lands). For example, the mixed use masterplan lands (MP1, MP2, MP6 and MP8) for Navan would appear to account for an additional c.58ha which is not overtly taken into account in the core strategy figure. Your authority should indicate the area of such lands in hectares inclusive of lands proposed to be zoned for residential and for a mixture of residential and other uses, as required under section 10(2A)(d), in addition to the area of any land already so zoned as required under section 10(2A)(c).

Secondly, the stated figures for the quantum of lands zoned for new residential use (A2) appears to be less than that measured from the plans for some settlements, but most notably for Navan. The stated figure is 83.6ha on table 2.12 of the draft plan, but the A2 residential lands (excluding phase

2 lands post 2026) measure approximately 113ha from the plans. Your authority should clarify the accuracy of estimates of the extent of such zoned lands.

Recommendation 10:

Your authority is requested to submit the size of the area in hectares inclusive of lands proposed to be zoned for residential <u>and for a mixture of residential and other uses</u>, as required under section 10(2A)(d), in addition to the area of any land already so zoned as required under section 10(2A)(c).

Observation 7:

With regard to the stated figures in table 2.12 for the quantum of lands zoned for residential use and the area as measured from the plans, most notably for Navan, your authority is requested to clarify the figures for said zoned lands.

Having regard to the foregoing, it is possible that there may be implications for the total area of lands zoned for residential and mixed residential lands. Your authority should address any issues arising from the foregoing to ensure consistency with the objectives of the NPF and the RSES for compact growth.

In this regard, the Office notes that the draft plan (section 3.5) refers to the tiered approach to zoning (TAZ) as required by the NPF (NPO72a, NPO72b and 72c refer). Whilst the draft plan indicates that an analysis of all undeveloped zoned lands in each settlement has been carried out to identify any potential infrastructural constraints that would inhibit the development of those lands, there is no infrastructural assessment report attaching to the draft plan. It is not therefore evident from the plans what lands are already serviced or can connect to services, and what lands are fully serviceable within the life of the plan. The methodology for the TAZ is appended to the NPF (appendix 3) and comprises a written infrastructural assessment.

The draft plan also advocates the sequential approach (section 3.6) but acknowledges that this is not always possible due to lands not being brought forward. However, the draft plan does not clearly demonstrate provision for development phasing (as required under section 10(2A)(f)) within the life period of the plan, or for implementation of sequential approach as recommended in the Development Plan Guidelines (2007).

The masterplan approach to be implemented for a number of settlements, including Ashbourne (3no), Dunboyne (3no.), Donacarney (1no.), Enfield (1no. strategic employment), Kells (4no.), Maynooth Environs (2no.), Navan (13no.) and Trim (2no. – one is not indicated in the plan). The Office notes the stated purpose of the masterplan approach (as referred to in the Navan Written

Statement Plan, Vol.2) is to ensure an integrated approach is taken to the phasing, management, and development of lands within the Master Plan Area.

Whilst a masterplan may be an effective mechanism to apply a sequential phasing to the development within the masterplan land, the overall phasing of development within the settlement can only be directed through the development plan and its core strategy.

Recommendation 11:

Your authority is requested to consider the following:

(i) The application of the tiered approach to zoning under the NPF (NPO 72a and appendix 3 refer) providing details of an infrastructural assessment applying the tiered approach to zoning (NPO72a, NPO72b and 72c refer), in accordance with the methodology set out in appendix 3 of the NPF.

In this regard, your authority should consult with the relevant infrastructure and services providers, including concerning infrastructural and capacity constraints for settlements and the availability of services on specific proposed zoned lands, or the realistic potential to provide (and cost of providing) services to specific proposed zoned lands, with a particular emphasis on water services.

Taking account of NPO72c, lands that are unlikely to be serviced within the life of the plan should not be zoned for development. Wastewater treatment availability and capacity, as indicated by Irish Water, will be critical, and your authority should be aware of same in making any necessary amendments in order to ensure that the projected population growth can be accommodated during the period of the proposed development plan.

- (ii) The application of a phased approach to development of lands within the settlement over the period of the plan, prioritising lands that are more favourably located sequentially (having regard to the sequential approach recommended under the Development Plan Guidelines (2007) and the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2012)).
- (iii) The overall quantum of lands zoned for residential and for mixed residential and other uses in its settlements.

Connectivity – Two of the National Strategic Outcomes (NSOs) of the NPF relating to transport and connectivity are particularly relevant to the draft plan – NSO2 Enhanced regional accessibility; NSO4 Sustainable mobility.

The core strategy indicates that the key transport infrastructure routes through the county comprise: the M2/N2, M3/N3 and the M4, extending out from Dublin (to Monaghan, Cavan and Sligo, respectively), and the N51 (Drogheda to Delvin, via Navan) and the N52 (Ardee to Mullingar, via Kells). In addition the intercity rail lines from Dublin to Galway and from Dublin to Belfast, and the commuter rail line to M3 Parkway (Dunboyne), being along the line of the former Navan rail line, are also indicated. The core strategy also indicates the extension of the commuter rail line from Dunboyne to Navan as *Future Commuter Line*.

Your authority will be aware of the fact that given the resources available, Project Ireland 2040, including the National Development Plan (NDP) did not include a commitment for the extension of the railway network to Navan within the lifetime of the plan.

Whilst the RSES included an objective to (RPO 8.8) to support the delivery of the *implementation* of the extension of the Dunboyne/M3 Parkway line to Navan, the RSES was subject of a Direction by the Minister amending the objective to support the *reappraisal* of the said extension. Incorrect references to the initial wording of the RSES (section 5.7.1 Rail) remaining in the draft plan should be amended. In this regard, the wording of MOV Pol 5, MOV POL 6 and MOV OBJ 3 are considered acceptable in view of the provision of the NTA Transport Strategy that, pending that reassessment of the subject potential rail connection under the Strategic review, the corridor previously identified for a rail link to Navan should be protected from development intrusion.

Recommendation 12:

As your authority will be aware, the RSES made on 28th June 2019 included references to Navan rail, including an objective (RPO 8.8) to support the delivery of the implementation of the extension of the Dunboyne/M3 Parkway line to Navan. These references were subsequently amended through a Direction to support the reappraisal of the said extension.

Accordingly, your authority is requested to review the wording of your draft plan, including section 5.7.1 Rail, in order to appropriately amend any references which inadvertently and incorrectly refer to the original wording of the RSES subsequently amended by the Minister.

The Office notes that the plan make references to the future extension of the railway to Navan. In particular, the Office notes that the population and household distribution (section 2.10) proposed in

the core strategy takes account of the delivery of Phase II of the Dublin-Navan rail line. The reason for the proposed extent of strategic reserve lands for Dunshaughlin is to demonstrate capacity to accommodate a critical mass of population associated with a rail link (table 2.4).

The plan indicates that the delivery of the rail line is a key element in supporting the sustainable growth of the town (section 3.4.8 Self-Sustaining Growth Towns) and the planning authority considers it appropriate to provide for the future growth and expansion of the town on the basis that it will be located along a sustainable rail based corridor. Within this context the identification of a strategic reserve for Navan and Dunshaughlin, in addition to lands to be development during the period of the plan, is considered reasonable.

The Office notes references to potential spur lines (to Ashbourne and Ratoath) considered under the draft plan (s.3.4.8, s.4.7.3.1, s.4.7.4.2 and ED OBJ 39, MOV OBJ 3, refer). Within the context of a future proposed Strategic review of the NTA Transport Strategy for the GDA (including a possible new feasibility study), inclusion of references to additional spur lines before their technical and financial appraisal could be counterproductive to the intended review process.

Observation 8:

Your authority is advised to omit references to and objectives relating to the investigation of the feasibility of a spur line to Ratoath and Ashbourne, which are more properly addressed within the context of a future proposed Strategic review of the NTA Transport Strategy for the GDA (including a possible new feasibility study).

Joined up planning: The RSES, in line with provisions of the NPF under NPO 70, requires (RPO 4.11) Meath County Council to prepare a Joint Urban Area Plan (JUAP) for Drogheda with Louth planning authority. Similarly, it requires (RPO 4.35) the preparation of a Joint Local Area Plan for Maynooth with Kildare planning authority.

The draft plan refers to the requirement to prepare the aforementioned joint plans and includes objectives to prepare same. In this regard objective CS OBJ 10 and SH OBJ 7 relating to the JUAP and JLAP, respectively, indicate that it is intended to prepare the said joint plans within the lifetime of the development plan.

The Office considers that, given the identification of these two settlements for significant growth under the RSES (and the NPF regarding Drogheda), and specifying the need for joint UAPs/ LAPs to accommodate same, it is imperative that the two said plans are expedited and identified as the priority ahead of any other LAPs. The said joint plans will be essential to ensure effective

coordination by the neighbouring planning authorities of development and the necessary supporting infrastructure and amenities of the said settlements.

The Office considers it desirable that the relevant objectives of the development plan (inter alia CS OBJ 10 and SH OBJ 7) should be mindful to follow the terminology of the RSES in referring to a joint plans, including referencing the correct RPOs under RSES (CS OBJ 10 refers to RPO 4.8 relating to Athlone).

Observation 9:

Your authority is advised to include an objective, or amend the objectives of the development to prioritise the preparation of the Joint UAP for Drogheda and the Joint LAP for Maynooth ahead of any other LAPs, setting out target dates for commencement of the process and for the eventual making of the said joint plans.

The Office notes the plans provided for in the draft plan do not indicate the land use zoning objectives associated with the adjoining planning authorities, adjacent to the urban settlements zoned under the draft plan. Section 9(4) requires that:

'In making a development plan in accordance with this Chapter, a planning authority shall have regard to the development plans of adjoining planning authorities and shall co-ordinate the objectives in the development plan with the objectives in the plans of those authorities except where the planning authority considers it to be inappropriate or not feasible to do so.'

Recommendation 13:

The plans in volume 3, Book of Maps, in the draft plan should be amended to clearly indicate the land use zoning objectives and other relevant objectives of the adjoining planning authority in order to demonstrate that the planning authority has had regard to the development plans of the adjoining authorities in accordance with the said legislative requirement.

It is noted that no statement has been included for the settlement of Mornington/Mornington East/Bettystown/Laytown in volume 2 Written Statement for Settlements.

Observation 10:

The Office welcomes the setting out, in Volume 2 of the draft plan, of a written statement for each of the settlements of the core strategy. However, it would appear that no statement has been included for the settlement of Mornington/Mornington East/Bettystown/Laytown.

Your authority is invited to consider including a statement for the said settlement, or to include an objective in the draft plan to provide for the inclusion of same though a future variation of the development plan within a reasonable time period. This will ensure that the development plan sets out an overall strategy for the proper planning and sustainable development of the area of the development plan, as required by the legislation (section 10(1) refers).

In addition, in relation to the objective RA OBJ 2 (Master Plan 1) for Ratoath, the Office notes that the said objective refers to 'White Land' rather than to D1 'Tourism' lands located immediately south thereof. Both areas are included within the master plan boundary MP1 on sheet no.33(b) in Volume 3 of the draft development plan. According to table 11.7 of the draft development plan, the objective of zoned 'White land' is to protect strategic lands from inappropriate forms of development which would impede the orderly expansion of a strategic urban centre. The subject objective to support the provision of appropriate and sustainable employment, visitor and tourist facilities on the 'White Land' is inconsistent with the land use zoning objective under the plan.

Recommendation 14:

In view of the inconsistency between objective RA OBJ 2 (Master Plan 1) and the land use zoning objective for the subject site as 'White Land', your authority is requested to amend the subject objective to refer only to lands proposed to be zoned D - Tourism under the draft development plan.

Local transport plans: The Office welcomes the inclusion of objective MOV OBJ 1 to prepare and commence implementation of Local Transport Plans (LTP), in conjunction with the NTA and relevant stakeholders for Drogheda (in conjunction with Louth County Council as part of the Joint Urban Plan) and for Ashbourne, Navan, Ratoath and other settlements where appropriate. This objective will aid the implementation of RPO 8.6 of the RSES that LTPs will be prepared for selected settlements in the county and will also be instrumental in the implementation of sustainable transport strategies for urban areas as required under section 10(2)(n). However, the Office is cognisant that no proposed timelines are included for the commencement and implementation of LTPs.

Observation 11:

The Office would advise your authority to amend the wording of objective MOV OBJ 1 in order to provide an order of priority among the settlements specified in the objective in relation to the sequence of preparation of local transport plans (LTP) and a broad expected timescale for their implementation.

3. Consistency of draft plan with relevant section 28 guidelines

Sustainable Rural Housing Guidelines for Planning Authorities (2005): Generally the Office is satisfied that the approach taken to the SRHG is consistent with the provisions of the SRHGs and with national and regional policy objectives (interalia, NPO15), including, in particular, your planning authorities proposed strategic approach to accommodate rural housing through rural nodes (section 9.5.4 refers). However, the Office is concerned that there may be difficulty for the planning authority in implementing the rural node approach, in the absence of the some form of identification of the location of rural nodes in map form.

The Office therefore considers it important that the proposed approach to rural nodes under the draft plan be informed by a systematic and justified selection process for the inclusion and designated of rural nodes, and that no rural village settlements be so designated.

Recommendation 15:

Your authority is requested to include criteria for the designation of locations as a rural node and exclude rural villages to which NPO16 (and RPO 4.77, RPO 4.83) and NPO18a (and RPO 4.78) would apply and to which the application of the restrictions under proposed policy RUR POL 15 may not be appropriate.

The Office would have concern regarding objectives to promote and encourage the provision of services, such as formal childcare facilities (RUR OBJ 19) and shops (RUR OBJ 20) in rural nodes. It would be more sustainable and consistent with national policy objectives (NPO16) to facilitate and encourage the provision of such services within the extensive network of small villages and small towns throughout county Meath.

Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (Cities, Towns & Villages) Guidelines for Planning Authorities (May, 2009) – The guidelines provide, inter alia, indicative appropriate residential density standards to apply to settlements depending on population size. For towns in excess of 5000 persons, no upper limit should, in principle, apply to town centres subject to specified requirements. Similarly, on brownfield sites higher densities would also apply. On public transport corridors in proximity to bus stops or rail stations minimum net densities of 50uph are advised. Whereas outer suburban/greenfield sites should be encouraged at net densities around 35-50uph and net densities below 30uph would tend to be discouraged.

These standards, which would apply to the following settlements (the proposed densities are in brackets) – Drogheda (35-45uph), Navan (45uph in proximity to future rail station; 35uph otherwise),

Dunboyne (35-45uph), Ashbourne (35uph), Trim (35uph), Kells (35uph), and Ratoath (35uph) - do not appear to have been given appropriate policy grounding in the draft plan.

The guidelines above also recommend that small towns and villages with populations of 400 to 5000 persons should (subject to qualitative design advices) achieve 30-40+uph in central locations, 20-35uph at edge of centre and not less than 15-20uph at outer locations. These standards would not appear to be fully reflected in the draft plan where the proposed densities are limited for many of the self-sustaining towns and small towns to 25uph, except for Dunshaughlin (35uph), Enfield (35uph) and Kilcock (25-35uph).

Residential densities in settlements designated as villages are proposed to be determined based on the prevailing scale and pattern of development, in addition to the availability of public services (section 3.8.10, refers).

It is reasonable for the development plan to provide a tailored approach to the consideration of residential densities for settlements depending on their size and character/function. However, it is important that the draft plan provides for residential densities within the range advised in guidelines above, subject to the qualitative design guidance and safeguards provided for in the guidelines (and the associated Urban Design Manual).

Observation 12:

Your authority should consider amending the draft plan in order to facilitate the appropriate range of densities recommended in the Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities (2012), issued by the Minister under section 28 of the Act, with reference to relevant safeguards referred to there-within

Sustainable Urban Housing: Design Standards for Apartments Guidelines for Planning Authorities (2018) - It is the policy under the draft plan (DM POL 14) that apartment schemes will be encouraged in Drogheda, Navan, Dunboyne, Kilcock, Maynooth, Ashbourne and Dunshaughlin. The draft plan provides that there will be a general presumption against apartments in towns and villages (DM POL 15) and all applications for apartments will be required to demonstrate compliance with the Design Standards for New Apartments.

Objective DM OBJ 61 requires apartment development to have regard to specified standards which reflect the said section 28 guidelines. The requirements of SPPR 4 in the guidelines above do not appear to have been fully reflected in the draft plan in terms of the application of standards for dual aspect units, with higher standards (50%) for dual aspects under SPPR 4 in certain locations.

Recommendation 16:

Your authority is requested to amend objective DM OBJ 61 to ensure consistency with the Design Standards for New Apartments, and specifically with the provisions of SPPR 4 concerning dual aspect units.

Urban Development and Building Heights Guidelines for Planning Authorities (2018) - In

accordance with the requirements of SPPR1 of the guidelines, the draft plan (section 11.7.8 and DM OBJ 31) plan identifies four locations considered suitable for increased building height – Dunboyne Pace and Dunboyne Central rail stations; Maynooth Environs, Drogheda Environs and Navan. However, as noted above in relation to the SRDUA guidelines, the density restrictions proposed under the plan are in conflict with Ministerial guidelines, including the requirements of SPPR1 which indicates that densities in excess of 45uph would be acceptable in specified locations. The Written Statement for Settlements (Volume 2) includes restrictions on residential density that would be inconsistent with SPPR1 of the Building Height Guidelines and which would therefore militate again the effective implementation of compact growth within appropriate settlements in county Meath, in accordance with national and regional policy objectives for compact growth.

Recommendation 17:

Your authority is requested to ensure that proposed limits on residential density in relevant urban settlements are consistent with the provisions SPPR1 of the Urban Development and Building Height Guidelines for Planning Authorities (2018).

Spatial Planning and National Roads Guidelines for Planning Authorities (2012): The development plan references the *Spatial Planning and National Roads Guidelines*. It is the proposed policy (MOV POL 24) under the draft plan to safeguard the capacity and safety of the National road network by applying the provisions of the said guidelines.

In addition, Section 9.16 *Restricting Access to Certain Categories of Roads,* and the following policies support the implementation of the requirements of the guidelines – ED POL 10, ED POL 18, RUR POL 57 and RUR POL 58. Section 5.9.4 *Exceptional Circumstances,* identifies seven locations (volume 3 of drat plan) where exceptional circumstances apply such that access may be facilitated. In this regard the advice of TII is required to inform (and be taken on board by the planning authority).

S.2.7 of the guidelines require that development plans and local area plans are required to take account and carefully manage interchanges and junctions, including maintenance of a satisfactory

level of service for road users. The planning authority is required to exercise care in including development objectives or zoning of locations at, or close to interchanges where such development could generate significant additional traffic within potential impact on the national road network. TII has raised some concern regarding the land use zoning proposals associated with the southern environs of Drogheda and the potential impact on the capacity of the M1, forming part of the strategic national road network and a part of the European TEN-T network. However it is noted that the land use zoning objectives are largely unchanged from those under the current development plan.

TII has also raised concerns about the objective (MOV OBJ 43) of the draft plan to upgrade the M1 J7 junction for improve capacity including vehicular access to/from Stamullen via City North Business Campus.

Observation 13:

Having regard to the provisions of the Spatial Planning and National Roads Guidelines for Planning Authorities (DECLG, 2012), including in particular the provisions under section 2.7, your authority is advised to consult with TII regarding the determination of the potential impact on the capacity of the strategic national road network arising from proposals for junction 7 of the M1 (including any implications arising from the core strategy for Stamullen) and the land use zoning proposals for Drogheda

4. Policy directives issued under section 29

No issues arise in this regard.

5. Other legislative and policy matters as the Minister may communicate

No issues arise in this regard.

Summary

The Office requests that your authority addresses the recommendations outlined above. The report of the Chief Executive of your authority prepared for the elected members under section 12 of the Act must summarise these recommendations and the manner in which they will be addressed.

Your authority is required to notify this Office within five working days of the decision in relation to the draft plan. Where the planning authority decides not to comply with the recommendations of the Office, or otherwise makes the plan in such a manner as to be inconsistent with the

recommendations made by this Office, then the Chief Executive shall inform the Office and give reasons for the decision of the planning authority.

Please feel free to contact the staff of the Office in the context of any queries in relation to the above, which we would be happy to facilitate. Contact can be initiated through the undersigned or at plans@opr.ie.

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Gary Ryan Director, Office of the Planning Regulator

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