OPR Ref: DP-011-24



26th April 2024

Planning Department, Meath County Council, Buvinda House, Dublin Road, Navan, Co. Meath, C15 Y291.

Re: Proposed Variation No. 2 to the Meath County Development Plan 2021-2027

A chara,

Thank you for your authority's work in preparing the Proposed Variation No. 2 (the proposed Variation) to the Meath County Development Plan 2021-2027 (the Development Plan).

The Office of the Planning Regulator (the Office) wishes to acknowledge the considerable and evident work your authority has put into the preparation of the proposed Variation against the backdrop of an evolving national and regional planning policy and regulatory context, which included taking account of the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midlands Regional Assembly.

As your authority is aware, a key function of the Office is the assessment of statutory plans to ensure consistency with legislative and policy requirements relating to planning. The Office has evaluated and assessed the draft Plan under the provisions of sections 31AM(1) and (2) of the *Planning and Development Act 2000*, as amended (the Act) and this submission has been prepared accordingly.

Recommendations issued by the Office relate to clear breaches of the relevant legislative provisions, of the national or regional policy framework and/or of the policy of Government, as set out in the Ministerial guidelines under section 28. As such, the planning authority is

required to implement or address recommendation(s) made by the Office in order to ensure consistency with the relevant policy and legislative provisions.

Observations take the form of a request for further information, justification on a particular matter, or clarification regarding particular provisions of a plan on issues that are required to ensure alignment with policy and legislative provisions. The planning authority is requested by the Office to action an observation.

A submission also can include advice on matters that the Office considers would contribute positively to the proper planning and sustainable development of the area. The planning authority is requested by the Office to give full consideration to the advice contained in a submission.

On adoption of the Variation, the Office will consider whether the plan has been made in a manner consistent with the recommendations of the Office and whether the plan, as varied, sets out an overall strategy for the proper planning and development of the area concerned.

Overview

The Office acknowledges the reason for the proposed Variation relating to the amendment of land use zoning objectives, which is to give effect to a range of land use zoning amendments. Predominantly, these amendments are necessary to reflect the permitted and current land use that has come to the attention of the local authority since the adoption of the Development Plan. The Office accepts the rationale for the subject land use zoning objectives and has no concern regarding same in respect of the statutory and planning policy framework.

The Office has, however, significant concerns regarding the proposed amendment to the written statement for Dunboyne / Clonee / Pace in Volume 2 of the Development Plan for the reasons set out below.

The submission below has been prepared to provide a strategic level input to your authority in finalising the proposed Variation. It is within the above context that the submission sets out one (1) recommendation under the theme of sustainable development.

1. Sustainable development

The core strategy sets a housing target of c.2000 units for Dunboyne to 2027, inclusive of the masterplan lands (500 units) and the extensive New Residential zoning around the existing built-up area of the settlement, including 1,180 units designated as 'infill' units consistent with national and regional objectives for compact growth. The proposal (under proposed amendment (j)) to remove the 500-unit limit for the masterplan to facilitate up to 800-1000 units is inconsistent with the core strategy and would be contrary to the obligations on the planning authority to implement the core strategy under section 15(1) of the Act.

The subject amendment, would facilitate a doubling of residential units on this peripheral site located outside the CSO settlement boundary for Dunboyne. Whereas, it is accepted that the Development Plan includes a 'live-work' concept for these lands, no evidence basis has been provided for an expansion of this concept, which is yet to advance through the planning application process. It is also not clear if the replacement of 'densities' with 'typologies' would facilitate development outside of the original 'live-work'.

The Variation as proposed would risk facilitating an extensive new community in an isolated area with poor pedestrian and cycling connection to the town, inconsistent with the implementation of compact growth under NPO 3 and RPO 3.2, with the implementation of proportionate growth under NPO 9 and RPO 4.1, and with the requirement to implement the regional growth strategy under RPO 3.1.

Further, the peripheral nature and poor pedestrian and cycling connection to the town also would not accord with objectives for sustainable settlement and transport strategies under section 10(2)(n) of the Act as such development would not facilitate modal shift to active travel consistent with RPO 5.3, with the *Greater Dublin Area Transport Strategy 2022-2042* and RPO 8.4, and would not constitute an integrated approach to transport and land use planning consistent with RPO 8.1. Significant modal shift to active and sustainable modes is necessary under the *Climate Action Plan 2024* to achieve the targets for green-house gas emissions reduction targets for 2030 and 2050, which targets are supported by the measures under the Minister for Transport's *National Sustainability Mobility Policy* (2023).

In addition, the subject amendment, which relates to lands within the vicinity of the N3/M3 junction with the R157 at Pace does not have regard to the requirement to avoid

compromising the capacity and efficiency of the national road/ associated junctions under section 2.7 of the *Spatial Planning and National Roads, Guidelines for Planning Authorities* (2012).

Recommendation 1 – sustainable development

Having regard to the core strategy of the Meath County Development Plan 2021-2027 (the Development Plan) and to the provision of new homes at locations that can support compact and sustainable development growth, and in particular to:

- section 15(1) of the *Planning and Development Act 2000*, as amended;
- RPO 3.1 of the RSES to implement the regional growth strategy;
- NPO 9 of the NPF and RPO 4.1 of the RSES for the proportionate growth of towns;
- NPO 3 of the NPF and RPO 3.2 of the RSES for compact growth;
- RPO 5.3 to facilitate sustainable travel patterns and RPO 8.1 to implement integrated transport and land use planning;
- the provisions modal shift under the *Climate Action Plan 2024*, as supported by the Minister for Transport's National Mobility Policy; and
- section 2.7 of Spatial Planning and National Roads, Guidelines for Planning Authorities (2012),

the planning authority is required to omit Proposed Amendment (j): Text update to Section 7.0 of Dunboyne, Clonee and Pace Written Statement, Vol. 2 of Development Plan.

Summary

The Office requests that your authority addresses the recommendation outlined above. As you are aware, the report of the chief executive of your authority prepared for the elected members under section 13 of the Act must summarise these recommendations and the manner in which they will be addressed.

At the end of the process, your authority is required to notify this Office within **five working days** of the decision of the planning authority in relation to the proposed Variation. Where your 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 this decision.

Please feel free to contact the staff of the Office in the context of your authority's responses to the above, which we would be happy to facilitate. Contact can be initiated through plans@opr.ie.

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AM C'Gnue.

Anne Marie O'Connor

Deputy Regulator and Director of Plans Evaluations

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