

18th November 2025

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

Re: Pre-draft Strategic Issues Paper for the Meath County Development Plan 2027-2033

A chara,

Thank you for your authority's work in preparing the Pre-Draft Strategic Issues Paper (Issues Paper) for the review of the Meath County Development Plan 2027-2033 (County Development Plan). The Office of the Planning Regulator (Office) acknowledges and welcomes the publication of this Issues Paper and your authority's work, more broadly, in advancing the review of the County Development Plan.

As the relevant provisions of part 3, chapter 5 of the Planning and Development Act 2024 have not yet commenced, in accordance with the provisions of section 31AM of the Planning and Development Act 2000, as amended (Act), the Office is obliged to evaluate and assess development plans in the context of certain statutory parameters including:

 matters generally to be contained in a development plan (section 10) and, in particular, section 10(2)(n) in relation to climate change;

- consistency with the National Planning Framework First Revision (2025)
 (NPF) and the Regional Spatial and Economic Strategy (RSES) for the
 Eastern and Midlands Regional Assembly (EMRA);
- Ministerial guidelines under section 28;
- Ministerial policy directives issued under section 29; and
- such other legislative and policy matters as the Minister may communicate to the Office in writing.

In relation to the RSES, please note that following the commencement of part 3, chapter 4 of the Planning and Development Act 2024 (2024 Act), the regional assemblies are now required to initiate a review of the RSES¹. This process is likely to run concurrently with the review of your County Development Plan. It will be essential therefore that the Planning Authority works with EMRA to ensure effective coordination between regional and local policy. The Office is happy to work with the Planning Authority in this respect.

The Office has set out some broad areas for your authority to consider in formulating the draft County Development Plan. These observations are offered without prejudice to any observations and recommendations as may be forthcoming from the Office at future stages of the plan making process, and do not affect the obligation on your Planning Authority to comply with the relevant legislative requirements.

1. Consultation strategies

The Issues Paper sets out key themes for the review of the County Development Plan. Recognising that the Issues Paper is the first step in preparing the new County Development Plan, and the role of public consultation in developing the overall strategy for the proper planning and sustainable development of the county, the Office fully supports the Planning Authority is the use of innovative methods to encourage and facilitate further public participation.

¹ The provisions for commencing the review of the Eastern RSES under the Planning and Development Act 2024, came into effect on 2nd October 2025.

To assist local authorities, the Office produced a toolkit to increase public engagement in development plan making² and more recently, has worked with the EPA in the preparation of a guidance note to improve the general public's engagement in strategic environmental assessment (SEA) practice³. The guidance note outlines principles and makes recommendations to ensure that the public are meaningfully informed and consulted during SEA processes.

2. Core strategy and settlement strategy

The formulation of the core strategy in line with section 10 of the Act is the most significant element in developing the County Development Plan for the period to 2033. The revised NPF and the RSES, in addition to relevant Specific Planning Policy Requirements specified in Ministerial guidelines under section 28 of the Act and any National Planning Statements published under section 25 of 2024 Act, will be key determinants in making the core strategy for your functional area.

The Office notes that the Issues Paper identifies that the NPF Implementation: Housing Growth Requirements (2025) (Housing Growth Requirements). These Housing Growth Requirements identify a new annual housing growth requirement for County Meath of 2,942 units between 2025-2034, and 1,362 units between 2035-2040.

When zoning land for residential development, Policy and Objective 2 of the Housing Growth Requirements requires an additional provision of up to 50% above the specified housing growth requirements. This headroom is intended to ensure that development plans include an adequate supply of residentially zoned land to facilitate housing delivery in accordance with national policy objectives.

The Office can provide further practical advice and technical support in the preparation of the core strategy, within our statutory remit, as the Planning Authority may require.

² <u>https://www.opr.ie/wp-content/uploads/2020/05/Increasing-Public-Engagement-with-Local-Authority-Development-Plans-A-Communications-Toolkit.pdf.</u>

³ https://www.epa.ie/publications/research/environmental-technologies/Guidance-Note-on-public-participation-in-SEA---Final-version-21.03.24.pdf.

A key function of the core strategy is the determination of a settlement hierarchy and the level of growth for the towns and villages across the county over the plan-period consistent with RPO 3.1 of the RSES. The Office notes the settlement hierarchy illustrated at page 8 of the Issues Paper and refers the Planning Authority to the Development Plans, Guidelines for Planning Authorities (2022) (Development Plans Guidelines) in relation to the distribution of population and housing targets to the various settlements in the settlement hierarchy, and the need for an evidence-based approach as referenced in RPO 4.1 of the RSES.

The Office notes the county is split between three different regions in the RSES, namely the Dublin Metropolitan Area, the Core Region and Gateway Region. In this regard, the County Development Plan will need to demonstrate consistency with the growth enablers and guiding principles which relate specifically to these regions in addition to those that apply more generally across the whole regional assembly area.

3. Metropolitan Area Strategic Plan (MASP)

The MASP in the RSES is a key policy driver which sets out an integrated land use and transportation strategy for the sequential development of the Dublin Metropolitan Area.

As acknowledged in the Issues Paper, the aim of the RSES is to strengthen the settlement structure of a region and to translate the objectives of the NPF into actionable regional policies.

It will be essential for the core strategy to have a focus and implementation strategy for the strategic development areas identified in the North-West corridor in table 5.1 of the RSES. The Planning Authority's attention is drawn to table 5.2 which sets out further spatial guidance for increased employment densities in the metropolitan area, and the guiding principles for the location of strategic employment and investment prioritisation in section 6.3 of the RSES.

The Planning Authority should also be aware of any emerging policy in relation to RSES revision which may provide for large-scale Transport Orientated Development (TOD) opportunities in the revised RSES/ MASP to target a proportion of planned growth in the metropolitan areas towards the delivery of new sustainable communities at brownfield and greenfield locations in the principal city and suburbs

areas and in the wider metropolitan areas focused on opportunities arising from existing and planned major public transport investment, along planned high capacity public transport corridors and in accordance with the principles of Transport Orientated Development.

4. Compact growth and zoning

Compact growth is one of the National Strategic Outcomes of the NPF, with a target under National Policy Objective (NPO) 9 of the NPF to

deliver at least 30% of all new homes that are targeted in settlements other than the five Cities and their suburbs, within their existing built-up footprints and ensure compact and sequential patterns of growth.

The growth and settlement strategy of the RSES reflects the compact growth objectives of the NPF. In this regard, the Office highlights the guiding principles for infill and brownfield development in chapter 3 of the RSES including the establishment of a database of brownfield sites and active land management strategies (RPO 3.2 and RPO 3.3).

The Office notes the potential for regeneration, consolidation and compact growth in the designated regional growth centre of Drogheda and the key towns of Navan and Maynooth as outlined in section 4.6 of the RSES, and that NPO 97 of the NPF provides for the MASP to include provision for large-scale Transport Orientated Development (TOD) opportunities in the wider metropolitan areas focused on opportunities arising from existing and planned major public transport investment, along planned high capacity public transport corridors and in accordance with the principles of TOD.

A key challenge for the forthcoming plan will be to identify opportunities for compact and sequential growth within the higher tier settlements of the county, leveraging and improving existing infrastructure, services and public transport to the benefit of existing and future residents.

In this respect, the Office highlights the policy and objective of the Development Plans Guidelines that a Settlement Capacity Audit (SCA) informs any land use

zoning. An SCA is based upon sound evidence that demonstrates services are/will be available within the lifetime of the plan.

In addition, NPO 101 of the NPF and section 2.4 of the Development Plans Guidelines requires planning authorities to distinguish between lands that are serviced and those that are serviceable.

When considering zoning lands for development that requires investment in infrastructure the Planning Authority will be expected to make a reasonable estimate of the full cost of delivery at both draft and final plan stages in accordance with NPO 102 of the NPF. This is critical to understanding the barriers and timescale for housing delivery and economic development.

The Planning Authority is advised to liaise closely with the relevant prescribed bodies concerning the timely delivery of essential services and infrastructure in accordance with NPO 105 of the NPF. Discussion with the newly established Housing Activation Office (HAO) within the Department of Housing, Local Government and Heritage will also be critical in terms of accelerating housing delivery by overcoming infrastructure barriers and unlocking land for development.

When considering zoning land for development that cannot be serviced within the life of the plan, the Planning Authority is advised that such lands should not be zoned for development in accordance with NPO 103 of the NPF.

The above measures will ensure that lands zoned for residential development can be developed for housing over the lifetime of the plan, creating well-connected and sustainable communities.

5. Lower tier plans

Currently, section 19 of the Act continues to apply with respect to local area plans. The Office highlights that on the commencement of part 3, chapter 6 of the 2024 Act relating to urban area plans, priority area plans and coordinated area plans, section 19 of the Act will be replaced and land use zonings will only be considered as part of the county development plan preparation process.

The Office advises the Planning Authority to identify in the draft County Development Plan those settlements for which it is intended to prepare an urban area plan, priority area plan or coordinated area plan, in order of priority.

As recognised by the RSES the preparation of a joint urban area plan for Drogheda and its environs to be prepared by Louth County Council and Meath County Council is a priority. Specifically, RPO 4.11 of the RSES requires the preparation of an Urban Area Plan which will provide for a coordinated planning framework to identify and deliver strategic sites and regeneration areas so that a minimum of 30% compact growth can be achieved.

The Office acknowledges and welcomes that work has already commenced on the preparation of the Drogheda urban area plan with respect to the necessary environmental assessments and that a Local Transport Plan (LTP) is currently being prepared by both planning authorities in collaboration with the National Transport Authority. The Office encourages the planning authorities to liaise with the EMRA in preparation of the Joint Urban Area Plan⁴ and to continue to prioritise the Urban Area Plan preparation.

6. Economic development and employment

The Issues Paper highlights County Meath's strategic location, infrastructure, amenities and skilled workforce as competitive advantages which form the existing strong economic base in the county. The RSES also identifies specific economic opportunities for the key towns of Navan, Maynooth and Drogheda to act as economic drivers for the county.

They key aspects of the review of the economic strategy should therefore focus on providing a robust level of evidence based analysis to identify and support further areas for employment and economic growth aligned with changes in national or regional policy, with particular regard to Ireland's national climate objective, and the transition to a climate-resilient, biodiversity-rich, environmentally sustainable and

⁴ Co-ordinated Area Plan under the Planning and Development Act 2024.

climate-neutral economy, and the Greater Dublin Area Transport Strategy 2022-2042 (GDA Transport Strategy).

The Planning Authority's attention is drawn to the OPR Practice Note PN04 'Planning for Employment Growth – The Development Plan and Employment Lands' which provides a helpful framework for the development of an employment strategy for the county. Within the Practice Note, section 5 comprises a step-by-step approach to assessing employment lands, providing an adaptable framework which planning authorities can tailor to create their own methodologies, dependent on available resources, local circumstances and economic profile.

In relation to the future zoning of employment lands, ensuring that the economic strategy of the County Development Plan is translated into the appropriate land-use zoning proposals is an important consideration in the plan making process. The evidence-base and rationale underpinning the zoning of employment uses should be clear and strategic in nature and seek to cater for the sustainable delivery and provision of employment led uses as well as supporting live-work communities. In this regard, the County Development Plan should be grounded on an up-to-date evidence-base that provides information on the existing quantum and capacity of employment lands, both developed and undeveloped as well as servicing information in order to fully understand future capacity requirements and to identify where shortfalls/oversupplies in provision may exist.

The County Development Plan should also include a methodology and justification in circumstances where new employment lands are proposed and/or retained from previous development plans in order to take account of any significant changes in national or regional policy in the intervening years. While this should reflect the county's enterprise/employment profile and local characteristics, the approach should also be logical and evidence-based particularly in relation to the quantum of lands proposed for zoning and should generally follow the approach outlined in appendix A, section 1.4 of the Development Plans Guidelines.

The principles of compact growth and the sequential approach to zoning in relation to site servicing, access arrangements, proximity to public transport and settlement consolidation also apply to zoning for employment use. Furthermore, accessibility is a central component in identifying employment zonings and the transport provision of

potential locations for new development should be considered strategically. For example, low intensity employment uses such as distribution and logistics centres will require convenient access to the strategic road network. Similarly, high intensity employment uses such as offices will require the highest level of accessibility by public transport and sustainable transport modes such as walking and cycling having regard to the obligation to mitigate climate change. With NPO 20 of the NPF there is a presumption in favour of development that can encourage more people and generate more jobs and activity within existing towns and villages.

Consistency with the GDA Transport Strategy will be highly significant in terms of high intensity employment uses, as will the section 28 guidelines on national roads⁵.

The Office also encourages the Planning Authority identify sites to support economic development and employment on brownfield regeneration sites.

The forthcoming County Development Plan should also set out the level of retail provision in the county consistent with the regional retail hierarchy in table 6.1 of the RSES. In this regard, the Planning Authority should also have regard to the Retail Planning Guidelines for Planning Authorities (2012), RPOs 6.10-6.14 and the RSES guiding principles for the location of trip intensive development.

7. Transport

The Office recognises the priority focus for the County Development Plan, in terms of transport and movement, is to reduce the negative impacts of car use in tandem with appropriate land use policies, to promote and facilitate effective travel options. The Office welcomes the priority infrastructure investments identified namely Navan Rail Link, DART + Coastal North and DART + West.

The Climate Action Plan 2025 (Climate Action Plan) identifies the need to significantly reduce car kilometres and increase sustainable journeys, guided by the

⁵ Spatial Planning and National Roads Guidelines for Planning Authorities (2012).

National Sustainable Mobility Policy (2022) and the proposed National Demand Management Strategy⁶.

The integration of land use and transportation is centrally important to this objective and to the objectives and provisions of the NPF (NPO 37 alternatives to the car, NPO 43 location of new homes, NPO 69 to reduce our carbon footprint and NPO 93 air quality, among others).

Chapter 8 Connectivity of the RSES includes a transport strategy and a framework for the integration of transport planning with spatial planning policies which together with the GDA Transport Strategy⁷ will inform the sustainable settlement and transport strategies for your plan area, in line with section 10(2)(n) of the Act.

The Office commends the Planning Authority for its recent approach to the preparation of an LTP to inform the preparation of the Maynooth and Environs Joint Local Area Plan, which will greatly assist in the integration of transport and land use planning consistent with RPOs 8.1, 8.2, 8.3 and 8.4 of the RSES and promoting a modal shift from the private car.

In view of the above, the Office would encourage the Planning Authority to include modal shift targets to be achieved over the plan period, aligned to relevant implementation measures, in order to achieve meaningful improvements in greenhouse gas (GHG) emissions and energy use in line with section 10(2)(n) of the Act.

A key issue for the forthcoming County Development Plan is to ensure that policies protect the strategic function of national roads, maximise the benefits of existing and planned public transport investment, and that planned improvements to the national road network are not eroded by a growth in demand for car travel, especially for short distances.

⁶ Actions for the Climate Action Plan 2025 reflect continuation of, and are in line with, agreed policies set out in Climate Action Plan 2023 and Climate Action Plan 2024.

⁷ https://www.nationaltransport.ie/wp-content/uploads/2023/01/Greater-Dublin-Area-Transport-Strategy-2022-42-1.pdf.

In this regard, the Office advises the Planning Authority to review the extent and location of land zoned for employment, industry and commercial uses in the vicinity of all national roads and associated junctions. The co-ordination of land use and transport planning in these areas will be critical to safeguarding the strategic function of the national roads in the county and achieving objectives for compact and sustainable growth.

Commitment to the proactive implementation of the Design Manual for Urban Roads and Streets (revised 2019) in the required locations, consistent with RPO 9.10 of the RSES, will also assist in delivering sustainable and active transport modes, in addition to improvement in the street environment and overall quality of life of urban areas and settlements of all sizes.

8. Infrastructure

The Office welcomes the Issues Paper statement that the County Development Plan must put in place a framework that promotes and provides high-quality physical infrastructure to allow development to progress in a sustainable manner.

The Office notes that additional watermains and wastewater upgrades are identified as phasing/enabling infrastructure for strategic development areas in Maynooth and Dunboyne. This will require the Planning Authority to work proactively with Uisce Éireann to ensure that deficiencies are resolved over the short to medium, and longer term.

In respect of surface water management, the County Development Plan should seek to maximise the implementation of Sustainable Urban Drainage Systems, in accordance with the guiding principles and objectives for surface water (RPOs 10.15-10.18 of the RSES).

9. Rural development

The Office recognises that County Meath has a large rural population and that rural areas within Meath contain a range of uses including agriculture and equine industries, centres of local food production, recreational and tourist activities, established villages and one-off rural housing.

Having regard to this, it is important that the County Development Plan provides a strong policy framework to proactively address issues of town/village decline and compact growth while protecting against urban generated housing in open countryside.

In this regard, the County Development Plan's policies will need to demonstrate consistency with NPO 24, NPO 28 and NPO 29 of the NPF.

Furthermore, the County Development Plan will need to consider the practical implementation of appropriate policy objectives through suitable land activation approaches and proactive facilitation of the building of homes within the existing footprint of rural settlements through measures such as site acquisition and serviced sites, consistent with NPO 26 and NPO 27 of the NPF.

Such initiatives have the potential to alleviate pressure on the open countryside through provision of a desirable alternative to one-off housing for families who would like to live close to the facilities, services and amenities available in rural villages and towns whilst maintaining ties to the wider rural community.

10. Flood risk assessment

The Planning Authority will be aware of the need to prepare a Strategic Flood Risk Assessment (SFRA) as part of the forthcoming draft County Development Plan, consistent with the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009). In this regard, the Office advises the Planning Authority to liaise with the Office of Public Works (OPW). The Planning Authority will need to take account of OPW Flood Relief Schemes including those that are proposed or being implemented⁸ in the county and undertake adequate flood risk assessment to determine if there is sufficient information to inform zoning decisions or if furthermore detailed analysis is required. The Planning Authority is advised that zoning objectives and policies in the County Development Plan should support and not impede such schemes.

⁸ https://www.floodinfo.ie/scheme-info/. Mornington Flood Relief Scheme Augmentation is being progressed by Meath County Council, funded by the OPW.

To assist with transparency and assessment of land use zonings proposed in the forthcoming draft County Development Plan, the Planning Authority is requested to overlay flood mapping with land use zoning maps.

11. Climate action and energy

The Planning Authority will be aware that the Office's evaluation of the County Development Plan is required under section 31AM(2)(a) of the Act to address, in particular, matters within the scope of section 10(2)(n) of the Act.

In this regard, the forthcoming County Development Plan process should play a significant role in reducing the county's carbon footprint, through the creation of less energy and travel intensive patterns of development, facilitation of energy generation from low carbon sources, and the adaptation of communities to the effects of climate change.

Having regard to the Climate Action Plan and to the objectives of the NPF and the RSES, the transition to a low carbon economy and the overall reduction in carbon emissions will become central issues for planning policies during the preparation of the County Development Plan.

Regarding climate change mitigation measures pertinent to section 10(2)(n) of the Act, chapter 8 Connectivity and section 8.3 Framework for the Integration of Transport Planning with Spatial Planning Policies, including RPOs 8.1-8.4 of the RSES are of relevance regarding the integration of land use and transport planning. The Planning Authority should also have regard to RPOs 8.8-8.14 in relation to transport investment priorities.

The Office welcomes the recognition at page 16 of the Issues Paper that the Meath Climate Action Plan 2024-2029 will inform the policies and objectives throughout the County Development Plan process.

In relation to renewable energy, one of the outcomes of the RSES review⁹ will be to implement NPO 74 of the NPF, which requires EMRA to identify renewable electricity

⁹ Chapter 4, Part 3 of the Planning and Development Act 2024 commenced on 2nd October 2024.

capacity allocations in their RSES, which the County Development Plan is required to plan for.

The Planning Authority should ensure that the County Development Plan incorporates comprehensive policies and objectives that promote renewable energy developments at appropriate locations to address NPO 75 of the NPF specifically planning for the delivery of Target Power Capacity (MW) allocations consistent with the RSES target for the county in order to achieve a climate neutral economy by 2050 in accordance with NPO 67, NPO 70 of the NPF and RPO 6.23 of the RSES.

The Office notes that as of Q3 2025 there are five wind farms, with none planned, and 11 solar farms, with 16 planned in County Meath¹⁰.

In relation to the impacts of coastal change and the preparation of the County Development Plan, the Office highlights NPO 53 and NPO 54 of the NPF which require the effects of sea level changes and coastal erosion to be taken into account in planning and to support the implementation of adaptation responses to limit risks to communities and coastal ecosystems from the impacts of coastal change.

12. Implementation and monitoring

The NPF and the RSES place increased emphasis on the importance of monitoring the implementation of statutory strategies and plans to measure plan effectiveness and to continually update a relevant evidence base to inform future planning strategies.

The forthcoming OPR Practice Note PN06 'Development Plan Monitoring', will support planning authorities in undertaking development plan monitoring, as required by the Planning and Development Act 2024 and also supported by NPO 108 of the revised NPF. This Practice Note builds on the findings of 'Measuring What Matters' (RTPI 2020) and the follow up workshop hosted by the OPR in 2024.

The Planning Authority is therefore encouraged to set out specific provisions for monitoring the implementation of the objectives of the County Development Plan,

¹⁰ Regional Development Monitor: SEAI - Local Authority Climate Action Plan Dashboard https://rdm.geohive.ie/pages/6988931ceead4cb4a56498b3337023e7#LowCarbon2.

having regard to NPO 105, NPO 106 and NPO 108 of the NPF, and the provisions of section 10 of the Development Plans Guidelines.

The Planning Authority should also implement approaches to measuring and monitoring compact growth to align with increased digitalisation of the planning system reflecting NPO 105 and NPO 106 of the NPF.

Summary

In summary, the Office commends your authority for the preparation of this Issues
Paper and advises your authority to take particular account of the following as part of
the preparation of the County Development Plan:

- the Climate Action Plan and the objectives of the NPF and the RSES with respect to the transition to a low carbon economy and the overall reduction in carbon emissions;
- the preparation of the Joint Urban Area Plan / Coordinated Area Plan for Drogheda which should continue to be progressed with Louth County Council as a priority;
- the Housing Growth Requirements (including 'additional provision' and the identification of Long-Term Strategic and Sustainable Development Sites/ Opportunity Areas) as set out in the Housing Growth Requirements which should inform the housing growth requirements of the County Development Plan's core strategy. These measures will optimise the ability to deliver on the Housing Growth Requirements and recognise that a relatively significant proportion of zoned lands are not activated over the period of a development plan;
- the designation under the RSES of Drogheda as a Regional Growth Centre
 and Navan and Maynooth as Key Towns, which should inform where the
 largest proportion of the county's future housing and population growth should
 be directed under the Settlement Strategy for the County Development Plan;
- the need for an evidence-based assessment in relation to the distribution of further housing growth to the other settlements in the settlement hierarchy,

including rural areas, to align with the Development Plans Guidelines and the RSES, including any provision for Transport-Oriented Development under the MASP:

- the preparation of a SCA, including an infrastructure capacity assessment, for all residential zoned land, identifying enabling infrastructure;
- the approach to residential zoning in towns and villages should be consistent
 with the core strategy of the plan itself, and with national and regional policy
 on compact growth, the sequential approach to development, and
 infrastructure capacity;
- which should reflect the economic strategy of the County Development Plan and should be grounded upon an up-to-date evidence base that relies on sound datasets and a reliable spatial analysis of different employment typologies, their location, concentration and future growth areas. An infrastructure capacity assessment should also be carried out for enterprise and employment zoned lands;
- policies and objectives should ensure that the benefits of existing and planned public transport investment are maximised as well as indicate how modal share targets are to be achieved over the plan-period;
- an evidence-based approach should be followed in the development of rural housing policies and maps to ensure consistency with NPO 28 of the NPF and to support the regeneration and rejuvenation of rural villages and towns;
- the need to prepare a Renewable Energy Strategy and to develop a policy framework to support renewable energy particularly solar and wind energy consistent with the RSES and NPO 74 of the NPF; and
- an increased emphasis should be placed on the implementation and monitoring of County Development Plan objectives including housing and supporting infrastructure delivery ensuring consistency with Government priorities.

The Office looks forward to reviewing the future draft County Development Plan and is committed to continued positive engagement with your authority in the implementation of national and regional policies at county and local level.

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 the undersigned or at plans@opr.ie.

Is mise le meas,

Anne Marie O'Connor

Deputy Regulator and Director of Plans Evaluation

Designated Public Official under the Regulation of Lobbying Act 2015

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