



Oifig an
Rialaitheora Pleanála
Office of the
Planning Regulator

1st May 2026

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

Re: Proposed Variation No. 5 to the Meath County Development Plan 2021-2027 (as varied)

A chara,

Thank you for your authority's work on preparing the Proposed Variation No. 5 (proposed Variation) to the Meath County Development Plan 2021-2027 (County Development Plan).

As Meath County Council (Planning Authority) is aware, a key function of the Office of the Planning Regulator (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 proposed Variation pursuant to Part 3 of the Planning and Development Act 2024 (Act) and its functions under section 546 and this submission has been prepared accordingly.

Recommendations issued by the Office further to section 58(9) of the Act relate to clear breaches of the relevant legislative provisions, of the national or regional policy framework and/or of the policy of Government. As such, planning authorities are requested to implement or address any recommendations made by the Office in order to ensure consistency with the relevant policy and legislative provisions.

Observations issued by the Office pursuant to section 546 of the Act may take the form of a request for further information or justification on a particular matter, or clarification regarding

particular provisions of a plan on issues that are considered necessary to ensure alignment with policy and legislative provisions. Planning authorities are requested by the Office to action an observation.

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

On adoption of the Variation, the Office will assess it in accordance with the statutory framework in section 63 of the Act.

Overview

The proposed Variation includes changes to the County Development Plan with regard to the implementation of the housing growth requirements which are reflected through updates to the core strategy and a number of zoning amendments.

The Office notes and commends the Planning Authority for the approach taken with regard to the identification of the majority of lands for residential development where the settlement level distribution reflects the principles of compact growth, infrastructure capacity, sequential development and sustainable transport accessibility.

It is stated that the proposed Variation does not include updates related to national policies and guidance that have been published since the adoption of the County Development Plan and the Office notes that the Planning Authority will consider such updates as part of the review of the County Development Plan. In the interests of consistency across the planning sector and in light of the approach taken by other planning authorities however, the Office encourages the Planning Authority to prepare a Variation as soon as possible that would align the County Development Plan with the Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities (2024) (Compact Settlements Guidelines) and the Planning Design Standards for Apartments, Guidelines for Planning Authorities (2025) in particular.

With respect to the proposed Variation, the Office considers that the zoning objectives are generally well located and aligned with national and regional planning policy. The Office considers, however, that the zoning of the Proposed Amendment (PA) 01 lands in the

Southern Environs of Drogheda would be more appropriately progressed as part of a planning and transport framework to support a well-connected and sustainable urban extension, ensuring that future residents are well integrated with existing and future communities, services and amenities, and to better realise the benefits of significant public investment in rail infrastructure.

This submission also includes recommendations to provide greater clarity in relation to the Core Strategy and the implementation of housing growth requirements. In addition, it identifies flood risk management issues that should be addressed prior to the adoption of the proposed Variation.

The submission below has been prepared to provide a strategic level input to your authority in finalising the proposed Variation. It is within this context the submission below sets out three (3) recommendations and two (2) observations under the following key themes:

Key theme	Recommendation	Observation
Implementation of the housing growth requirements	Recommendation 1	-
Southern Environs of Drogheda	Recommendation 2	-
Flood risk management	Recommendation 3	Observation 1
Active travel	-	Observation 2

1. Implementation of the housing growth requirements

In relation to housing growth requirements, any provisions for growth in the County Development Plan are required to have regard to relevant section 28 guidelines including in particular:

- NPF Implementation: Housing Growth Requirements (2025) (Housing Growth Guidelines);
- Compact Settlements Guidelines;
- Urban Development and Building Heights, Guidelines for Planning Authorities (2018);
- Development Plans, Guidelines for Planning Authorities (2022); and

- EU Directives on Strategic Environmental Assessment, Floods, and Birds and Habitats.

Having regard to the Housing Growth Guidelines, the Office notes and welcomes that new residential lands are proposed at 24 locations in 11 settlements across County Meath. The proposed Variation involves the rezoning of 18 parcels of land to residential use across a range of settlements, with a particular focus on the towns of Dunboyne and Kilcock in the Metropolitan Area, the Southern Environs of Drogheda as a Regional Growth Centre and Navan as a Key Town.

However, the basis for the calculation of the housing capacity of the proposed new residential zoned lands is unclear. In this respect, the Office notes that when the densities related to each site set out in table 2.12B: Core Strategy Supplementary Table are applied to the hectareage of new zoned land, the resulting capacity does not align with the potential number of units in column G of table 2.12B. The Office recommends therefore, that the Core Strategy Table should be updated to provide clarity in respect of the capacity for housing delivery in County Meath.

Notwithstanding the above, and the concerns raised below in respect of the PA 01 lands, the Office is satisfied that the quantum of proposed zoned lands will otherwise provide an appropriate pipeline for housing delivery, particularly given the requirements that will arise as part of the review of the County Development Plan.

Recommendation 1 - Implementation of the Housing Growth Requirements

In order to ensure clarity with respect to the Core Strategy and the implementation of the housing growth requirements, and having considered the following;

- the NPF Implementation: Housing Growth Requirements (2025);
- section 3.3 of the Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities (2024) (Compact Settlements Guidelines) related to densities; and
- the Development Plans, Guidelines for Planning Authorities (2022), related to the Core Strategy,

the Planning Authority is recommended to provide a fully updated Core Strategy Table to incorporate the following in particular:

- (i) the quantum of additional lands proposed for residential development in each settlement in the proposed Variation No. 5 to the Meath County Development Plan 2021-2027;
- (ii) the proposed densities, which should be materially consistent with the Compact Settlements Guidelines; and
- (iii) the resultant housing yields applying (i) and (ii) above.

2. Southern Environs of Drogheda

Significant infrastructural investment is planned for Drogheda including a Dart+ extension as referenced in the Greater Dublin Area Transport Strategy 2022-2042. While not currently designated as a Transport Oriented Development (TOD) location, the extension of Dart+ to Drogheda would strengthen Drogheda's position as a TOD and would support National Policy Objective (NPO) 99 of the National Planning Framework First Revision (2025) (NPF) relating to the accelerated delivery of TOD at suitable locations.

Site PA 01 in the Southern Environs of Drogheda is located approximately 2km to the east of Drogheda train station where greenfield lands comprise the majority of lands between the train station and PA 01.

Chapter 11 of the County Development Plan as adopted identifies the 'Colpe, lands to the north of Mill Road and south of Marsh Road' as MP 14 (Masterplan lands). While it would not appear from this locational description that PA 01 is located within MP 14, its location is confirmed in the proposed Variation documentation.

As a Regional Growth Centre, the Southern Environs of Drogheda presents a significant opportunity for a sustainable and plan led extension to Drogheda, taking account of the potential TOD status in particular, however such an extension to the town must be properly planned and coordinated in the context of the entirety of the area rather than the piecemeal approach proposed with PA 01. In this regard the Office notes and welcomes that a Local Transport Plan (LTP) is being prepared for Drogheda which will inform the sustainable development of the town, particularly in relation to sustainable active travel connections in

the direction of the train station, the town centre and adjacent neighbourhoods. The Office notes that the proposed access arrangements to PA 01 would be via Mill Road to the east, taking account of the railway line along the southern boundary of the lands. Notwithstanding that both a primary and secondary school are currently accessed via Mill Road, the Office notes the absence of a footpath along this road to facilitate either existing or planned development in this area.

Having regard to all of the above therefore, it is important that the PA 01 lands would be considered, planned and developed within the overall context of a comprehensive framework for an urban extension to Drogheda in the southern environs, with a key focus on sustainable connectivity to the rail station, and integration into the existing community, services and amenities of the town. The current proposal to zone the land for immediate development risks creating an isolated and car dependant community without direct access to key amenities and nearby communities (noting in particular the barrier that the crossing of the rail line to the south presents) and without a clear or certain timeline for the resolution of these issues. The preparation of a framework plan for the whole of this general area east of the train station and west of Mill Road would therefore provide the opportunity to properly consider all the elements that would be required in order to provide for the creation of a successful, sustainable and well-integrated new neighbourhood. In order to inform any such framework plan for this area however, the Office considers that the LTP for Drogheda and the preparation of an evidence-based plan for the lands between the rail station and Mill Road including PA 01 must be undertaken in the first instance, this approach should also seek to capitalise on the Government's investment in rail infrastructure in Drogheda both in relation to the existing rail network and future Dart+ extension to the town and seek to increase densities in this area generally.

Recommendation 2 - Southern Environs of Drogheda

Having regard to the provision of new homes at locations that can support compact and sustainable development and the co-ordination of land use zoning, infrastructure and services, and having considered the following;

- NPO 9 of the NPF related to compact and sequential patterns of growth;
- NPO 99 of the NPF related to Transport Oriented Development;

- RPO 3.2 of the RSES related to compact growth;
- RPO 4.2 of the RSES aligning the settlement strategy to infrastructure investment;
- RPO 8.1 and 8.4 of the RSES for the integration of land use and transport planning;
- section 6.2.3 of the Development Plans, Guidelines for Planning Authorities (2022) related to a sequential approach to zoning; and
- Greater Dublin Area Transport Strategy 2022-2042,

the Office recommends that the Planning Authority;

- (i) makes the plan without Southern Environs of Drogheda PA 01 (at this time, noting the comments above); and
- (ii) includes an objective to engage with Louth County Council to prepare a planning framework for the area between Drogheda train station and Mill Road, south of the River Boyne and north of the railway line. This framework should be informed by the final Local Transport Plan for Drogheda and include appropriate access arrangements and permeability connections between the subject lands, the train station, town centre and adjacent neighbourhoods.

3. Flood risk management

The Office welcomes the preparation of the Strategic Flood Risk Assessment in accordance with NPO 1 of the NPF and the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) (Flood Guidelines).

However, the Office has identified land use zonings that are located within either Flood Zones A and/or B (Dunboyne/ Clonee/ Pace, Kilcock Environs) while past flood extents overlap with parts of PA 01 in Dunboyne/ Clonee/ Pace.

Furthermore, due to the proximity of water features to proposed development sites, the Planning Authority should undertake a risk assessment for sites at Dunshaughlin, Navan and Stamullen in order to establish whether a Stage 3 detailed flood risk assessment is required to be carried out (as set out in section 2.21 of the Flood Guidelines), and if necessary to amend or omit land use zonings to water compatible uses only where it is

found that highly vulnerable development is proposed within Flood Zones A/B or less vulnerable development in Flood Zone A and the Plan Making Justification Test has not been passed.

Finally, the Office notes that parts of proposed development lands in Navan are located within high end future scenario climate change extents, where the potential future risks and associated mitigation measures are unclear, in relation to sites. Similarly, Seasonal Flood Mapping for 2020-2021 show flood extents in Enfield. The Office advises the Planning Authority to address flood risk management taking account of the potential impacts of climate change on flood risk.

Recommendation 3 - Flood Risk Management

Having regard to flood risk management and having considered the following;

- NPO 78 of the NPF ensuring flooding and flood risk management informs place making;
- RPO 7.12 of the RSES avoiding inappropriate land use zonings and development in areas at risk of flooding; and
- the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009),

the Planning Authority is recommended to:

- (i) amend land use zonings so that highly vulnerable development is not permitted on either Flood Zone A or Flood Zone B and less vulnerable development is not permitted on Flood Zone A, at the following locations:
 - a) Dunboyne/ Clonee/ Pace PA 01; and
 - b) Kilcock Environs PA 01; and
- (ii) undertake a site visit to establish whether a Stage 3 detailed flood risk assessment is required with respect to each of the sites listed below. Where it is found that highly vulnerable development (Flood Zones A/B) or less vulnerable development (Flood Zone A) is proposed and the Plan Making

Justification Test has not been passed, the Planning Authority is required to amend or omit land use zonings to water compatible uses only:

- a) Dunshaughlin PA 01;
- b) Dunshaughlin PA 02;
- c) Navan PA 05; and
- d) Stamullen PA 01.

Observation 1 - Flood Risk Management

Having regard to flood risk management and having considered:

- NPO 78 of the NPF potential impacts of climate change on flooding and flood risk; and
- the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009),

the Planning Authority is advised to;

- (i) amend the Strategic Flood Risk Assessment to discuss how potential future climate change risk and any associated mitigation measures have been considered in relation to the following sites:
 - a) Navan PA 01;
 - b) Navan PA 02;
 - c) Navan PA 03; and
 - d) Enfield PA 02; and
- (ii) Review the past flood extents on floodinfo.ie with respect to Dunboyne/ Clonee/ Pace PA 01 and identify the extent of same on the proposed development site.

4. Active travel

In order to promote walking and cycling in Athboy, Carlanstown, Dunboyne/ Clonee/ Pace, Navan, the Southern Environs of Drogheda and Stamullen, the Planning Authority should investigate all opportunities to create permeability linkages between the proposed development sites and existing adjacent residential sites.

Observation 2 - Permeability

Having regard to the need to integrate land use and sustainable transport planning and healthy placemaking and having considered:

- RPO 8.1, RPO 8.6 and RPO 9.10 of the RSES;
- Climate Action and Low Carbon Development Act 2015, as amended;
- Climate Action Plan 2025;
- the National Sustainable Mobility Policy (2022); and
- the National Investment Framework for Transport in Ireland (2021),

the Planning Authority is advised to investigate any opportunity for creating permeability linkages between the proposed development sites at the locations listed below and existing adjacent residential developments for walking and cycling only. Where the Planning Authority identifies permeability opportunities, specific objectives should be included in the Meath County Development Plan 2021-2027 in relation to same:

- (i) Athboy (PA 03);
- (ii) Carlanstown (PA 01);
- (iii) Dunboyne/ Clonee/ Pace (PA 01);
- (iv) Navan (PA 01);
- (v) Southern Environs of Drogheda (PA 02); and
- (vi) Stamullen (PA 01).

Summary

The Office requests that your authority addresses the recommendations and observations outlined above. As you are aware, the report of the Chief Executive of your authority prepared for the elected members under section 58(11) of the Act must summarise these recommendations and the manner in which the Chief Executive proposes to address them.

Where a Planning Authority makes a variation, it is required to notify the Office **within one week** of the decision to adopt the Variation. Where an authority decides not to comply with the recommendations of the Office, then it shall inform the Office as soon as practicable and provide reasons for the decision not to so comply.

Your authority is also required to send the Office a copy of the Variation and any submissions made by the Minister, the relevant regional assembly and the National Transport Authority during the Variation preparation process.

Please be advised that planning authorities are also required to publish notice of the Variation within a week of the adoption, stating that a copy of the County Development Plan as varied will be available for inspection on a website and at a place specified in the notice no later than five weeks after the date of adoption.

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.

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