Proposed Variation No. 2 to Meath County Development Plan 2013-2019

Manager's Report to Members under Section 13(4) (a) of the Planning and Development Acts 2000-2013



10th March 2014

Planning and Community Meath County Council Abbey Rd, Navan, Co. Meath.

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1. Introduction

This report forms part of the statutory procedure for varying a Development Plan and is prepared under Section 13(4) (a) of the Planning and Development Acts 2000-2013. The purpose of this report is to summarise the submissions and observations received from the public following the publication of the proposed Variation No. 2 to the Meath County Development Plan 2013–2019 and the Manager's response to the issues raised.

Variation No. 2 to the Meath County Development Plan 2013–2019 encompassed a number of proposed amendments to the County Development Plan:

- introducing development objectives (including land use zoning objectives) into the Meath County Development Plan 2013 – 2019 for 29 no. existing urban centres which presently have Local Area Plans This is the beginning of a process which will reduce the number of Local Area Plans which presently exist in County Meath to 6 no.¹;
- 2. introducing land use zoning objectives and an Order of Priority into the Meath County Development Plan 2013 2019 for the release of residential and employment lands for the centres which will retain their Local Area Plans namely Ashbourne, Drogheda Environs, Dunboyne/Clonee/Pace, Dunshaughlin and Ratoath;
- ensuring that only the quantum of land required to meet the household projections as set out in Table 2.4 for each centre is identified for release during the lifetime of the Meath County Development Plan 2013–2019. This will ensure consistency with the Core Strategy of the Meath County Development Plan 2013–2019;
- 4. reviewing the appropriateness of the nature, location and quantum of industrial and employment generating land use within each centre as part of this process, and;
- 5. applying the land use zoning objectives contained in the Core Strategy of the Meath County Development Plan 2013 2019 to the land use zoning objectives maps which are being incorporated into the Meath County Development Plan 2013 2019.

Variation No. 2 to the Meath County Development Plan 2013–2019, together with its associated Strategic Environmental Assessment Report, Appropriate Assessment Report and Strategic Flood Risk Assessment was placed on public display from the 18th December 2013 to 24th January 2014. Public advertisements were placed advising of the publication of the proposed variation and all statutory organisations were informed of the proposed variation to the plan. The proposed variation was made available for inspection in a number of locations:

- Planning and Community Department, Abbey Road, Navan;
- Meath County Council Area Offices, and;
- Meath County Council website, www.meath.ie

108 no. submissions were received on the proposed variation during the statutory period. These are discussed further in Section 2.

¹ It is the intention of Meath County Council to commence the revocation process of the 29 no. Local Area Plans as soon as this variation to the Meath County Development Plan has been made.

1.1. Contents of Manager's Report

In accordance with Section 13(4) (b) of the Planning and Development Acts 2000 - 2013, the Manager's Report on the proposed variation must:

- 1. List the people who made submissions.
- 2. Summarise the following from the submissions or observations:
 - Issues raised by the Minister, and;
 - Issues raised by other bodies or persons.
- 3. Give the response of the Manager on the issues raised taking into account:
 - The proper planning and sustainable development of the area;
 - The statutory obligations of any local authority in the area, and;
 - Any relevant policies or objectives of the Government or of any Minister of the Government.

1.2. Procedure following preparation of Manager's Report

The report of the Manager must be prepared and submitted to the Members of the Planning Authority not later than 8 weeks after given notice of the intention to make the proposed variation. This report is being distributed to the Elected Members of Meath County Council on the 10th March 2014.

In accordance with section 13(5)(a) of the Planning and Development Acts 2000-2013, the Members of the Planning Authority shall consider the proposed variation and the report of the Manager submitted herewith. The Members shall complete their consideration of the proposed variation and the report of the Manager within 6 weeks of receiving the Manager's Report. Following this, the Members must resolve to make the variation to the Development Plan, either with or without the proposed alterations.

In making the variation to the County Development Plan, the Members shall be restricted to considering the proper planning and sustainable development of the area to which the Development Plan relates, the statutory obligations of any Local Authority in the area and any relevant policies or objectives of the Government or any Ministers of the Government.

The variation to the County Development Plan shall have effect from the day that the variation is made.

1.3. Submissions Received

108 no. submissions were received during the draft display period. These were numbered on receipt as follows shown in the table below and categorised according to which settlement or Local Area Plan they related to:

No.	Submission Received From	Settlement/Local Area Plan
1001	Thomas Maher & Sally Griffin	Duleek
1002	Nicola Halligan	Enfield
1003	Martin Lonergan, Dunboyne College of Further Education	Dunboyne/Clonee/Pace
1004	Health & Safety Authority	General
1005	Michael McKenna Architectural Services on behalf of Ken Leonard	Dunshaughlin
1006	Audrey Whitson	Enfield
1007	Dwane Dignam	Enfield
1008	Anita Mahon	Enfield
1009	Angela Smith	Enfield
1010	Marie Lane	Enfield
1011	Sharon Curran	Enfield
1012	Joe Morris	Enfield
1013	Marijke Morris	Enfield
1014	Paul & Anne Golland	Enfield
1015	Michelle Keating	Enfield
1016	Rebecca Collins	Enfield
1017	Rachel Fox	Enfield
1018	Sharon Comerford	Enfield
1019	Siobhan O'Brien	Enfield
1020	Garvan Lennon	Enfield
1021	Mary Waters	Enfield
1022	Lorraine Hurley	Enfield
1023	Nicola Kilcoyne	Enfield
1024	Declan Rowe	Enfield
1025	Charlie Fox	Enfield
1026	Gillian Scully	Enfield
1027	Kevin Mullan	Enfield
1028	Nicola McCullen	Enfield
1029	Aoife Forkin	Enfield
1030	Grainne O'Connor	Enfield
1031	Catriona Reilly	Enfield
1032	Dermot Kelly	Enfield
1033	Cliona O'Donovan	Enfield
1034	Denise Dillon	Enfield
1035	Joe Hamilton	Enfield
1036	Laura Bolger	Enfield

	Margaret O'Brien	Enfield
1038	Michael Hanley	Enfield
1039	Lydia Donlon	Enfield
1040	Adrian Donlon	Enfield
1041	Sharon Shealy	Enfield
1042	Andrew Fox	Enfield
1043	National Roads Authority	Multiple
1044	Sarah Scanlon, Enfield MACRA	Enfield
1045	Jill O'Meara	Enfield
1046	Triona McFall	Enfield
1047	Department of Defence	Gormonston
1048	Denis Leonard, Dunboyne College of Further Education	Dunboyne/Clonee/Pace
1049	Conor Price	Kilmessan
1050	Sarah Cooling	Enfield
1051	Michael Lawlor	Donore
1052	Dan Nulty	Drogheda
1053	Michael & John Lawlor	Duleek
1054	Declan Brassil & Co. on behalf of Hickcastle Ltd & Hickwell Ltd	Dunboyne/Clonee/Pace
1055	Declan Brassil & Co. on behalf of Matt Brady	Dunboyne/Clonee/Pace
1056	Patrick Burke, Chairman of Grounds Committee on behalf of Blackhall Gaels GAA Club	Kilcock
1057	James Gaynor Toberra on behalf of Emily Gough	Stamullen
1058	Fewer Harrington & Partners on behalf of Rybo Partnership	Ratoath
1059	Department of Education and Skills	General
1060	John Spain Associates on behalf of HSE, Dublin North East	Athboy
1061	Waterman Moylan on behalf of Crocusglen Ltd.	Clonard
1062	Clyde Shanks on behalf of Soll Developments (ROI) Ltd	Donore
1063	Clyde Shanks on behalf of Soll Developments (ROI) Ltd	Drogheda Environs
1064	Maguire & Associates on behalf of High Degree Construction	Enfield
1065	Stephen Little & Associates on behalf of Granbrind Ltd	Ashbourne
1066	Stephen Little & Associates on behalf of The Adroit Company	Kilcock Environs
1067	Stephen Little & Associates on behalf of Kieran Wallace & Mark Etherington, Joint Receivers of Dorville Homes	Kilcock Environs
1068	Future Analytics Consulting on behalf of Sean Quinn & David Rogers	Ashbourne
1069	Cllr Nicholas Killian	Ratoath

1070	Stephen Little & Associates on behalf of J Murphy Developments Ltd	Southern Environs of Drogheda
1071	O'Connor Sutton Cronin & Associates on behalf of Rybo Partnership	Enfield
1072	O'Connor Sutton Cronin & Associates on behalf of Mr Michael Brennan	Dunboyne/Clonee/Pace
1073	O'Connor Sutton Cronin & Associates on behalf of the Hilltown Partnership	Dunboyne/Clonee/Pace
1074	Brady Hughes Consulting on behalf of Shannon Homes	Southern Environs of Drogheda
1075	Environmental Protection Agency	General
1076	Oliver Nolan Architectural Technologist on behalf of George Williams	Ratoath
1077	Charlotte Sheridan, Sheridan Woods	Crossakiel, Rathcairn, Gibbstown & Carnaross & Villages generally
1078	Declan Brassil & Co. on behalf of McGarrell Reilly	Dunboyne/Clonee/Pace
1079	Department of Environment, Community & Local Government	General
1080	BMA Planning on behalf of Blackhall Green Homes Ltd.	Kilcock Environs
1081	OPW	Multiple incl. Enfield, Kildalkey, Ballivor, Longwood & Drogheda Environs
1082	The Planning Partnership on behalf of Clann na nGael GAA Club and Homex Ltd.	Athboy
1083	The Planning Partnership on behalf of Vetimill Ltd.	Ballivor
1084	The Planning Partnership on behalf of Eracase Ltd.	Ashbourne
1085	The Planning Partnership on behalf of Kingscroft Developments Limited	Ashbourne
1086	Castlethorn Construction	Dunshaughlin
1087	Ryan Nowlan Consulting on behalf of Glenbeigh Construction Ltd.	Dunboyne/Clonee/Pace
1088	Wherity Chartered Surveyors Limited on behalf of Mr. Thomas Gannon	Ashbourne
1089	Brook McClure Planning & Development Consultants on behalf of Robert Rennicks	Kilbride
1090	National Transport Authority	Multiple including Dunboyne/Clonee/Pace, Stamullen, Maynooth, Dunshaughlin, Ratoath.
1091	Declan Brassil & Co. on behalf of McGarrell Reilly Group	Stamullen
1092	Enda Flynn, St. Mary's Primary School	Enfield
1093	Charles Moore on behalf of Christopher Martin	Julianstown
1094	PD Lane Associates on behalf of Luc Hemeryck	Ratoath
1095	TBS (The Big Space) on behalf of Sean Boylan	Dunboyne
1096	McPeake Auctioneers on behalf of Denis O'Driscoll	Kilbride

1097	Declan Brassil & Co. on behalf of Alcove Ireland Two Ltd, Charter House, 5 Pembroke Row, Dublin 2	Kilcock Environs
1098	Declan Brassil & Co. on behalf of McGarrell Reilly Group (Kilcock)	Kilcock Environs
1099	Dublin & Mid-East Regional Authorities	General
1100	McGill Planning Ltd on behalf of Frank Nowlan (Receiver)	Ashbourne
1101	Downey Planning on behalf of Aiden Murphy Receiver for John O'Meara (In Receivership)	Dunshaughlin
1102	Brook McClure Planning & Development Consultants on behalf of Denis O'Driscoll	Kilbride
1103	ILTP on behalf of Eamonn Walsh	Dunboyne
1104	Philip & Bridget Cantwell	Summerhill
1105	Cllr William Carey	Enfield
1106	Geraldine Fahy Planning Consultant on behalf of Michael Weir	Longwood
1107	John Connaughton, John Connaughton Ltd	Dunboyne/Clonee/Pace
1108	Declan Clabby & Associates on behalf of Michael Dale	Enfield

The submissions are discussed according to their Electoral Area / Local Area Plan in the following sections. General submissions or submissions referring to a number of centres are discussed separately. Each submission is summarised and then the Manager's response and recommendation to each is provided. All submissions received are available for inspection in the Planning and Community Department, Abbey Road, Navan.

The Planning and Development Acts 2000-2013 specifically refer to the manner in which the submissions made by the NTA and the Regional Authority should be dealt with. The issues raised and recommendations made in each of these submissions must be summarised and the Manager's Report must outline the recommendations of the manager in relation to the manner in which those issues and recommendations should be addressed. The issues raised by the Minister for the Environment, Community and Local Government must also be summarised separately.

1.4. How to Read the Proposed Amendments

- 1. The existing text of the proposed Variation No. 2 of the County Development Plan 2013 2019 is shown in normal font.
- 2. Deletions are shown as strikethrough text which has also been highlighted in yellow to assist the reader
- 3. Amendments / Additions are shown as **red** text.

This is shown in the following example:

CS OBJ 4	To ensure that the Navan, Trim and Kells Development Plans are consistent with	
	the settlement hierarchy and population projections set out in this Development	
	Plan. These In this regard, a variation to the Navan Development Plans will	
	be <mark>varied</mark> published<mark>, if necessary,</mark> to ensure that <mark>they are</mark> it is consistent<mark>,</mark>	
	within one year of the adoption of with the Meath County Development Plan	
	2013-2019 within one year of its adoption.	

2. Submission from Department of Environment, Community & Local Government

Submission 1079 Department of Environment, Community & Local Government

Summary of Main Issues Raised

The Department notes the proposed Variation No. 2 and is supportive of the proposed changes to the County Development Plan which are envisaged.

Manager's Response

The comments are duly noted and welcomed.

Recommendation

No change.

SEA/AA Comment

No comment required.

3. General Submissions Received

Submission 1004 Health & Safety Authority

Summary of Main Issues Raised

The Health & Safety Authority (HSA) indicates that their approach to land use planning is set out in the document "Policy & Approach of the Health & Safety Authority to COMAH Risk-based Landuse Planning". The HSA indicate that they would expect the variation to contain the following:

- 1. An indication of the planning policy in relation to major accident hazard sites notified under the regulations;
- 2. The consultation distances supplied by the HSA to Meath County Council in relation to such sites which should be indicated on the various maps included in the plan as well as any more specific distances and advice supplied by the Authority;
- 3. A policy on the siting of new major hazard establishments, taking account of Article 12 of Directive 105/2003/EC and the published policy of the Authority in relation to new developments, including developments in the vicinity of such establishments, and;
- 4. Mention of the following notified site Irish Industrial Explosives Limited, Clonagh, Enfield, Co. Meath.

Manager's Response

The County Development Plan Volume I, Section 4.7 Prevention of Major Accidents outlines the Council's policy in relation to major accident hazard sites notified under the regulations. Map 4.1 identifies the one such existing site in Co. Meath along with those sites in adjoining counties whose consultation zones extend into Co. Meath. Irish Industrial Explosive Limited is located in Co. Kildare notwithstanding their postal address being Clonagh, Enfield, Co. Meath. In addition, the HSA Consultation Zone of 1,000 metres is wholly contained within the administrative area of Co. Kildare. The facility is located approximately 2.7 km from the county boundary.

Recommendation

No change required.

SEA/AA Comment

No comment required.

Submission 1043 National Roads Authority

Summary of Main Issues Raised

The submission relates to the following points which follow a general policy introduction

- 1. ED OBJ 2 the Authority advises that it does not support a number of the lands which have been deemed "appropriate" in determining the nature, location and quantum of industrial and employment generating land use for different urban centres. These concerns will be dealt with under the specific settlements concerned.
- 2. Leinster Orbital Route (LOR) the Authority notes with concern that the draft Variation on display makes no reference to the proposed Leinster Orbital Route despite the inclusion of TRAN OBJ 21 in the adopted County Development Plan. A feasibility study in relation to the LOR has been completed and has been provided to the Minister for Transport for consideration at Government level. The Authority has issued the LOR Corridor Protection Study to Meath County Council to identify zones along the key radial routes where junctions with the LOR may be constructed in the future in order to protect such areas from development. The Authority recommends that the Council consider implications for the LOR in devising the Written Statements and Development Objectives for the towns and villages in proximity to the LOR Duleek, South Drogheda Environs, Enfield and Kilcock.
- 3. Framework Plans the Authority considers that Framework Plans should not be undertaken in a non statutory approach with respect to Stamullen, Ashbourne, Carlanstown & Dunboyne / Pace. The Authority considers it essential that these plans be referred to relevant stakeholders for consultation and agreement prior to the receipt of any planning application. The Authority also indicates that it anticipates consultation on the Framework Plans when drafted, given the relationship of the certain plan areas to the national primary road network. The Authority will aim to protect the strategic national investment in the areas and will if necessary appeal any decision to grant planning permission, which it considers undermines this investment.

4. Kells Area Written Statements

a. Athbov

The proposed relocation of the Clann na nGael GAA grounds farther out the Navan Road adjoins the N51 at a location on the national road network where an 80 kph speed limit applies. To conform to national guidelines, the Authority recommends that access to the G1 "Community Infrastructure" lands and the adjoining Phase II A2 "New Residential" lands are reviewed to give effect to the official policy prior to the making of the proposed variation noting the availability of alternative access onto the local road network.

In relation to the proposed N51 bypass of Athboy, it is re-iterated that while such a proposal may not be an NRA priority, it is beneficial to schedule other works that will be delivered at a local level. The NRA may not be responsible for the financing of such "additional projects". Any local improvements to this road should be done in consultation with and subject to the agreement of the NRA.

b. Carlanstown

The Authority notes and welcomes the provision made to access the E2 "General Enterprise & Employment" lands through the A1 "Existing Residential Lands" within the reduced urban speed limit to the east of the village.

In relation to the proposed N52 bypass of Carlanstown which refers to a road reservation in the text of the Written Statement but is not shown on the land use zoning objectives map, it is re-iterated that while such a proposal may not be an NRA priority, it is beneficial to schedule other works that will be delivered at a local level. The NRA may not be responsible for the financing of such "additional projects". Any local improvements to this road should be done n consultation with and subject to the agreement of the NRA.

5. Slane Area Written Statements

a. Stamullen

The Authority re-emphasises its already stated concerns with regards to increased capacity and connectivity to Stamullen village from the M1 Motorway. The Authority is seriously concerned that the Framework Plan as indicated would lead to the premature overloading of the existing M1 junction at Gormonston and the compromising of the performance of the strategically important M1 corridor. The proposals place a very significant reliance upon the M1 for locally generated traffic which is inappropriate for any national motorway but particularly so when the motorway is the main economic artery between Ireland and Northern Ireland. The Authority is further disturbed that the focus of development of this urban area is wholly dependent on the use of the private car and also the provision of access to the national roads network which will perpetuate unsustainable commuting and travel patterns. Reference is also made to the An Bord Pleanála direction / order which rejected the construction of the North – South Distributor Road linking the Gormonston Road with the M1 Interchange. Extracts from this direction are included.

The Authority strongly recommends that the Planning Authority reject the current approach in the draft Variation and undertake a strategic review of these objectives in line with Section 2.7 of the DoEHLG's Spatial Planning and National Roads, the aforementioned An Bord Pleanála decision and future requirements for potential development of a deepwater port.

6. Additional Policies and Residential / Employment Zoned land Evaluations for Local Area Plans.

a. Ashbourne

Concern is expressed that whilst an exceptional circumstance has been included in the County Development Plan for lands near Rath roundabout, a Framework Plan has been prepared for these lands without consultation with the NRA. The Authority requests that the views of the Authority are sought and dealt with prior to the submission of any planning application within this area.

b. Dunboyne / Pace

The Authority notes the requirement to prepare and complete an Integrated Framework Plan for Land Use and Transportation for the corridor. However, the Authority is seriously concerned with regard to a number of objectives included for this corridor in the draft Variation, in particular PACE OBJ 1 and 2 which are considered premature pending the completion of this IFPLUT. The Authority re-iterates its view that the nature and extent

of the development proposed in the vicinity of Pace Interchange would result in significant impacts on the efficiency, safety and the carrying capacity of the N/M3 and associated junctions in the area and would conflict with official policy which seeks to protect public investment in the national road network. The inclusion of PACE OBJ 1 & 2 further exasperates this opinion. Dependence on non statutory Framework Plans and the need for stakeholder engagement / consultation such as with the NRA is again reiterated.

c. Portan, Clonee

The Authority notes that a junction strategy has been agreed between the NRA, Meath and Fingal County Councils for this area. This has important consequences for the LAP and also the IFPLUT which has yet to be completed.

Manager's Response

2. Leinster Orbital Route

It is acknowledged that the construction of the Leinster Orbital Route (LOR) is included as a key objective of the Regional Planning Guidelines for the Greater Dublin Area. Its importance is given significant prominence within the context of a sustainable regional planning strategy and the importance attached to providing improved accessibility and connectivity between Large Growth Towns in the Hinterland Area. The NTA Draft Strategy recommends the finalisation of a preferred route corridor and its protection from development intrusion. However, it is acknowledged that the full development of the LOR proposal is unlikely to be required during the Draft 2030 Strategy period. Accordingly, it is recommended that an incremental approach to its delivery is adopted. It also recommends that the most deficient sections on the existing road network should be targeted for investment in terms of road accident records, or congestion.

Accordingly, the policy framework contained in the County Development Plan 2013 -2019 has been formulated in this context.

TRAN POL 27

To co-operate with the NRA, NTA and other Local Authorities to provide the Leinster Outer Orbital Route as proposed in the Regional Planning Guidelines and the NTA's draft Transport Strategy.

TRAN OBJ 21

To co-operate with the NRA, NTA and other Local Authorities in clarifying and finalising the route of the Leinster Outer Orbital Route (linking Drogheda, Navan, Trim and Naas) proposed in the 'Regional Planning Guidelines for the Greater Dublin Area' and the NTA's draft Transport Strategy. This is particularly important in the vicinity of proposed major junctions along the route in order to protect the identified corridor from development intrusion.

The County Development Plan 2013-2019 does not seek to reserve the Leinster Orbital Route Corridor Protection Study area free from development. It seeks to clarify and finalise the route of the LOR. Furthermore, no additional lands are being proposed for development as part of Variation No. 2 to the County Development Plan. It is respectfully considered that the protection of the Corridor Study Area would be premature pending completion of the planning phase of the project and the identification of a preferred route. This would appear consistent with the approach advocated in the NTA draft 2030 Strategy (Measure ROAD 3 refers).

3. Framework Plans

The Council commits to referring the recently prepared Framework Plan for lands close to Rath roundabout on the N2 to the NRA and to have regard to their comments prior to any planning application being considered in respect of these lands. Similarly, the Council commits to referring

any other Framework Plan which are prepared which could impact on any national road to the NRA. These centres are Dunboyne / Pace, Enfield, Stamullen, Carlanstown and Slane.

4. a) Athboy Written Statement

The Council accepts that the location of the lands identified for G1 "Community Infrastructure" land use zoning objective to facilitate the relocation of the Clann na nGael GAA grounds is at a point where the general speed limit of 80 kph applies. The 50 kph speed limit applies to a point 60 metres from the junction with the Gillstown Road (L80055). It is accepted that the preferred means of accessing the lands identified as Phase II residential and the G1 lands is off the Gillstown Road. It is considered necessary to amend the wording of CF OBJ 2 to reflect same. The comments of the NRA are welcomed in this regard.

The comments in relation to the N51 bypass of Athboy are noted.

b) Carlanstown Written Statement

The comments in relation to the N51 bypass of Carlanstown and accessing of the E1 "General Enterprise & Employment" lands to the east of the village are noted. Reference to the map based objective in the Written Statement for the N51 bypass shall be omitted as this was included by error.

5. a) Stamullen

The Meath County Development Plan 2013-2019 includes an objective to advance the possible upgrading of M1 Junction 7 to improve its capacity inclusive of the facilitation of vehicular access to / from Stamullen via the City North Business Campus to the M1 Interchange (TRAN OBJ 17 refers). The land use zoning objectives map demonstrates an indicative alignment which would provide for such a connection from Junction 7 through to Stamullen. It is stated as a primary objective of the Stamullen Written Statement to advance the realisation of this objective in cooperation with the National Roads Authority and with any upgrade of the capacity of the junction to facilitate the development of the adjoining employment lands to be provided for by the developers of said lands. This approach is considered reasonable.

The Council is bemused by the comments now received by the NRA in this regard. The Council clearly indicated their intentions for Stamullen in the County Development Plan 2013-2019. The Written Statement and Land Use Zoning Objectives Map for Stamullen now seek to realise this objective. The Council have reviewed the submissions received by the NRA during the preparation of the present County Development Plan. At no stage in the plan preparation did the NRA object to the proposed increased connectivity from the M1 through to Stamullen village. The NRA indicated that they would not be responsible for the funding of any such schemes or improvements (listed as part of TRAN OBJ 17) which included reference to the Gormonston junction. This is accepted and reflected in the wording of LU OBJ 2 (extract provided)

The Framework Plan shall realise MA OBJ 5 which seeks to facilitate vehicular access to/from the village via City North Business Campus to the M1 Motorway Interchange. The Framework Plan shall be informed by a revised Traffic Impact Assessment which shall assess the capacity of the existing configuration of Junction 7 to cater for the projected traffic volumes with any upgrade of the capacity of the junction to facilitate the development of the adjoining employment lands to be provided for by the developers of said lands.

Indeed, it is difficult from reading the above objective how the stated view of the NRA in their most recent submission is supported namely "the Authority is seriously concerned that the Framework Plan as indicated would lead to the premature overloading of the existing M1 junction at Gormanston and the compromising of the performance of the strategically important M1

Corridor". The objective (LU OBJ 2) clearly requires an evidence based solution to be developed centred on the findings of a revised and updated TIA which assesses the capacity of the existing configuration of Junction 7 to cater for projected traffic volumes. It also accepts inherently the probable need to upgrade this junction to cater for the projected traffic volumes. It is also apparent to this Council that the original junction configuration demonstrates a clear intention to have a western connection in comparison to the free flow configuration of the Ashbourne, Navan South & Kells Interchanges on their respective Motorways. It is accepted that reference needs to be included to involve the NRA in the preparation of the Framework Plan as there is little to be achieved by advancing development management proposals in the absence of an agreed approach. An amendment to the wording of LU OBJ 2 in the Stamullen Written Statement shall be included accordingly.

The Council also disagrees with the comments of the NRA that the focus of development for this urban area is wholly dependent on the use of the private car and the provision of access to the national roads network. The Written Statement clearly states that the transport vision for Stamullen is to ensure that, where necessary, the use of private vehicles is facilitated in an efficient and equitable manner whilst encouraging the use of more sustainable modes of transport including pedestrian and cycle movement. In order to achieve this vision it will be necessary to provide for the improvement in pedestrian and cycle facilities and traffic movement within the village. In addition, the Council will work with the NTA and Bus Éireann to provide a public bus service to Stamullen whilst improving connectivity to City North Business Campus which is presently served by a private bus company. These are reflected in the following policies:

MA POL 5

To provide for an integrated network of cycle ways throughout the village where considered appropriate in order to promote more sustainable modes of transportation.

MA POL 7

To co-operate with relevant transport bodies and authorities to develop a regular bus service to Stamullen which would improve the range of public transport services available to the significant resident population.

6. ED OBJ 2 – Evaluation of Employment Lands -

a) Ashbourne

The Council has already committed above to referring the Framework Plan (FP 3 refers) which has been prepared to the NRA.

b) Dunboyne / Pace

The Council notes the comments of the NRA with regard to the possible impact of the proposed land use zoning objectives to the Pace Interchange and the consistency of such comments over the past number of years. The Council can reassure the NRA that they remain committed to the finalisation of the Integrated Framework Plan for Land Use and Transportation which is required as a high level objective for this corridor in the County Development Plan 2013 – 2019. At present, the impact of the emerging preferred land use strategy on the existing transport network is being modelled. When this exercise has been completed, the Council will re-engage with the NTA, NRA, Iarnród Éireann – Irish Rail and DoECLG. The Elected Members will also be consulted with and kept informed of progress on this important project. It is hoped that this exercise can be completed within the first half of this year and that the final Strategy will inform the review of the existing Dunboyne Clonee Pace LAP which is scheduled for 2015 notwithstanding the incorporation of land use zoning objectives for this area into the County Development Plan.

It is considered that ED OBJ 2 contained in Volume I of the County Development Plan is clear that until this IFPLUT has been completed that no review of the appropriateness of the quantum, nature and location of employment generating lands shall take place.

In the case of Dunboyne / Clonee / Pace, the integrated land use and transportation study identified as a high level development objective in Section 4.1.4 will be required to be completed in advance of this exercise being carried out. As part of this integrated land use and transportation study, Meath County Council will consult and agree the future location and appropriate scale of development, particularly in the knowledge intensive, science based and people intensive employment sectors with statutory stakeholders including the NTA, NRA and larnród Éireann.

In the intervening period, all of the existing lands identified for employment generating uses which includes the lands identified for the Level II Town Centre in the existing Local Area Plan inclusive of their development objectives had been incorporated into the text of the proposed Variation No. 2 to the Meath County Development Plan 2013 – 2019. A comparison of the wording of PACE OBJ 1 and PACE OBJ 2 included in proposed Variation No. 2 with RET OBJ 5 and EMP OBJ 8 contained in the existing Dunboyne Clonee Pace Local Area Plan will confirm this statement. The wording of PACE OBJ 1 in particular stated that "the preparation of the Framework Plan shall have regard to and generally be consistent with the Integrated Framework Plan for Land Use and Transportation as required pursuant to in the Meath County Development Plan 2013-2019". No development was therefore assumed to be forthcoming until the IFPLUT has been completed and the IFPLUT underpins the identified location in the statutory land use plan for the Level II Town Centre. If this does not occur, the basis of the need for the Framework Plan dissipates. It is the opinion of the Council that there was no expectation of development occurring at this location until the IFPLUT has been completed and the recommendations of same integrated into the statutory land use framework for the area.

However on reflection, the Council accepts that the wording of PACE OBJ 1 & 2 as suggested in the draft Variation present certain difficulties and may in fact be inconsistent with the policy framework presented in Volume I of the County Development Plan. The wording of PACE OBJ 1 presents a clear expectation of a Level II Retail Centre occurring at Pace which may not be realised if the IFPLUT does not validate this location. It is suggested therefore that a degree of flexibility needs to be incorporated into the suggested policy framework which allows for different outcomes to emerge as a result of the preferred land use strategy contained in the IFPLUT. It is also considered that the clear emphasis contained in the County Development Plan for this area related to the strategic employment potential of the area being promoted rather than the promotion of a Level II Town Centre. It is considered that an evidential basis is required to determine the future range and scale of appropriate uses at this location.

It is therefore suggested that the wording of these objectives be altered as follows:

Pace OBJ 1

The County Development Plan Volume I (section 4.1.4 Ashbourne / Dunboyne refers) indicates that it is a high level development objective to require the preparation of an Integrated Framework Plan for Land Use and Transportation (IFPLUT) for the area of North Dunboyne. The IFPLUT shall also identify the manner in which Dunboyne shall gradually grow to a Level II Town Centre by 2028 as provided for in the Retail Strategy for the Greater Dublin Area. Following the completion of, and to give effect to, the recommendations of the IFPLUT, the Planning Authority shall To prepare a unitary Framework Plan for the identified lands designated Level 2 Retail Centre at Pace which will address land use, transportation, connectivity, urban design, recreation and implementation issues. Delivery of the Level 2 Retail Centre appropriate classes and level of development shall be phased and co-ordinated in tandem with infrastructural provision across the

Corridor Area. It shall be a grounding objective of this Framework Plan to encourage development in a sustainable, co-ordinated and efficient manner where such development is facilitated and accompanied by the required infrastructure and services.

The Framework Plan shall provide, inter alia:

- 2. for retail floorspace and associated facilities to include some high density and other appropriate residential development commensurate with population growth over the time period of the County Development Plan having regard to the commitment in the Regional Planning Strategy for Dunboyne to grow from a Level 3 to a Level 2 Centre gradually over a 15 20 year timeframe;
- 3. high end office based employment uses at levels commensurate with its location and proximate to a multi-modal public transport interchange;
- 4.—a pedestrian and cycle route over the M3 Motorway to lands to the east subject to the agreement of the National Roads Authority.

The preparation of the Framework Plan shall have regard to and generally be consistent with the Integrated Framework Plan for Land Use and Transportation as required pursuant to in the Meath County Development Plan 2013-2019 and other policies and objectives of the County Development Plan, the Regional Planning Guidelines and the 2008 – 2016 GDA Retail Strategy.

Pace OBJ 2

The County Development Plan Volume I (Section 2.9.6 Primary Land Use Zoning Categories refers) indicates that an integrated land use and transportation approach to planning will be applied to this area which may require the reconsideration of the White Lands in north Dunboyne (Pace) within the life of this Development Plan. Following the completion of, and to give effect to, the recommendations of the IFPLUT, the Planning Authority shall To consider the need to provide additional lands other than those identified pursuant to Pace OBJ 1 for strategic employment use predominantly for high end office development on lands adjacent to the emerging preferred location for the future Level 2 Centre at Pace on a phased basis within the life of the County Development Plan as identified on the land use zoning objectives map.

c) Portan, Clonee

The comments of the NRA in relation to the tripartite agreement with regard to the determination of a roads layout for this area are duly noted.

Recommendation

1. Amend CF OBJ of the Athboy Written Statement as follows

CF OBJ

To ensure that any future residential development on the lands identified for "A2" incorporating the existing Clann na nGael GAA grounds off the N51 (Kells Road) will only be developed once sufficient relocation works, to the satisfaction of the Planning Authority, for the GAA club has taken place onto a new site outside of the development envelop, to the north east of the town. The relocation shall be inclusive of footpaths and public lighting from the town to the facility, in tandem with the first phase of residential development. Access shall not be permissible from the N51 at a point where the general speed limit of 80 kph applies and national policy seeks to avoid the creation of additional access points onto national roads to which speed limits in excess of 60 kph apply. A shared entrance to serve the lands identified for G1 "Community Infrastructure" and A2 "New Residential" land use zoning objectives for lands east of the Gillstown Road shall be provided for.

2. To replace Paragraph 3 of Section 9.0 Movement & Access in the Written Statement of Carlanstown

There is currently the provision for a road reservation to allow for the by-passing of the N52 to the south-east of the Village, thereby alleviating traffic congestion and speeds within the Village's Main Street. This reservation is maintained within the land use objectives map accompanying this statement and is deemed to be a necessary piece of infrastructure for future regional development and to guarantee the Village has access to the surrounding urban centres.

The Main Street of Carlanstown is recognised as a constrained route which caters for local and regional traffic. It is an objective of this development framework to provide for an N52 bypass of the village. This route will serve to improve through traffic movements and consequently the environment and streetscape of the centre of Carlanstown.

3. Amend LU OBJ 2 of the Stamullen Written Statement as follows

LU OBJ 2

To require the preparation of a Framework Plan for the lands identified as a combination of E2 "General Industry & Employment" and E3 "Warehousing & Distribution" Phase I and Phase II on the accompanying land use zoning objectives map. The Framework Plan shall be agreed with the Planning Authority in writing prior to the submission of any new planning application which seeks to develop lands for development which have not been the subject of a previous grant of planning permission. Applications for extension of duration or revisions to previously approved developments shall be considered on their merits and shall not require the agreement of a Framework Plan in advance. The Framework Plan shall have regard to and be consistent with the range of uses indicated in the County Development Plan as being appropriate to E2 "General Industry & Employment" Category 3 (Small Towns and Villages) and E3 "Warehousing & Distribution" as provided for in Volume I of the County Development Plan. The Framework Plan shall realise TP OBJ 5 which seeks to facilitate vehicular access to/from the village via City North Business Campus to the M1 Motorway Interchange. The Framework Plan shall be informed by a revised Traffic Impact Assessment which shall assess the capacity of the existing configuration of Junction 7 to cater for the projected traffic volumes with any upgrade of the capacity of the junction to facilitate the development of the adjoining employment lands to be provided for by the developers of said lands. The National Roads Authority shall be involved as a stakeholder in the formulation of this agreed Framework Plan.

4. Additional Policies for Dunboyne Clonee Pace Local Area Plan

Amend the wording of Pace OBJ 1 & 2 as follows:

Pace OBJ 1

The County Development Plan Volume I (section 4.1.4 Ashbourne / Dunboyne refers) indicates that it is a high level development objective to require the preparation of an Integrated Framework Plan for Land Use and Transportation (IFPLUT) for the area of North Dunboyne. The IFPLUT shall also identify the manner in which Dunboyne shall gradually grow to a Level II Town Centre by 2028 as provided for in the Retail Strategy for the Greater Dublin Area. Following the completion of, and to give effect to, the recommendations of the IFPLUT, the Planning Authority shall To prepare a unitary Framework Plan for the identified lands designated Level 2 Retail Centre at Pace which will address

land use, transportation, connectivity, urban design, recreation and implementation issues. Delivery of the Level 2 Retail Centre appropriate classes and level of development shall be phased and co-ordinated in tandem with infrastructural provision across the Corridor Area. It shall be a grounding objective of this Framework Plan to encourage development in a sustainable, co-ordinated and efficient manner where such development is facilitated and accompanied by the required infrastructure and services.

The Framework Plan shall provide, inter alia:

- 5.—for retail floorspace and associated facilities to include some high density and other appropriate residential development commensurate with population growth over the time period of the County Development Plan having regard to the commitment in the Regional Planning Strategy for Dunboyne to grow from a Level 3 to a Level 2 Centre gradually over a 15 20 year timeframe;
- 6.—high end office based employment uses at levels commensurate with its location and proximate to a multi modal public transport interchange:
- 7.—a pedestrian and cycle route over the M3 Motorway to lands to the east subject to the agreement of the National Roads Authority.

The preparation of the Framework Plan shall have regard to and generally be consistent with the Integrated Framework Plan for Land Use and Transportation as required pursuant to in the Meath County Development Plan 2013-2019—and other policies and objectives of the County Development Plan, the Regional Planning Guidelines and the 2008 – 2016 GDA Retail Strategy.

Strategic Environmental Assessment and Appropriate Assessment of the IFPLUT shall be carried out.

Pace OBJ 2

The County Development Plan Volume I (Section 2.9.6 Primary Land Use Zoning Categories refers) indicates that an integrated land use and transportation approach to planning will be applied to this area which may require the reconsideration of the White Lands in north Dunboyne (Pace) within the life of this Development Plan. Following the completion of, and to give effect to, the recommendations of the IFPLUT, the Planning Authority shall Fo consider the need to provide additional lands other than those identified pursuant to Pace OBJ 1 for strategic employment use predominantly for high end office development on lands adjacent to the emerging preferred location for the future Level 2 Centre at Pace on a phased basis within the life of the County Development Plan as identified on the land use zoning objectives map.

SEA/AA Comment

Athboy CF OBJ

No response required.

Carlanstown

Suggested amendment relates to Written Statement and not to a policy or objective; No response required.

Pace OBJ 1 and Pace OBJ 2

The proposed amendment to Pace OBJ 1 and Pace OBJ 2 will have potential beneficial effects on the planning and sustainable development of the area. However, the residual effects identified in

the draft Environmental Report in respect of the transportation impact resulting from a Level 2 Retail Centre and the provision of high-end office development will remain.

It is also recommended that Strategic Environmental Assessment and Appropriate Assessment of the IFPLUT should be carried out. In addition, the incorporation of the recommendations of the final IFPLUT into the new Local Area Plan for Dunboyne / Clonee would also be subjected to SEA and AA.

Stamullen LU OBJ 2

No response required.

Submission 1059 Department of Education & Skills

Summary of Main Issues Raised

In the event that population projections for these areas become available, the Department will welcome the opportunity to comment on the need or otherwise to reserve sites for future education provision.

Manager's Response

The Planning Department have been in direct contact with the Department on numerous occasions over the course of the past year seeking their advice on the need for additional school provision within development centres across the County. The land use zoning objectives map and Written Statements reflect the advice given by the Department in this regard.

The Department have been advised that there is no further provision at plan making stage to consult with them in this regard. The Department has also been advised that it is the considered view of this Council that the individual Written Statements contained information in relation to the projected house numbers which can be constructed over the remaining period of the Meath County Development Plan in each urban centre. A population projection could easily be construed on this basis using published CSO Census data from the 2011 Census of Population.

In light therefore of the extensive consultation which has taken place over the past year, the formal submission received from the Department is disappointing.

Recommendation

No change proposed.

SEA/AA Comment

No comment required.

Submission 1075 Environmental Protection Authority

Summary of Main Issues Raised

The submission offers guidance in relation to any further amendments to the proposed draft Variation and to the content of the final SEA Statement.

The submission is divided into 2 sections, the first dealing with the variation itself and the second dealing with the Environmental Report.

The comments in relation to the Variation are generally supportive of the approach undertaken and that it is clear that the SEA, AA and FRA have each been taken into account and integrated into the Variation. In particular it is acknowledged that that zoned lands at significant risk of

flooding (Zone A & B) have been rezoned/dezoned for various settlements where possible. This should limit the amount of vulnerable land uses at risk of flooding in implementing the Variation. It also acknowledged that the County Development Plan Core Strategy has been taken into account, in relation to the selection and phasing of lands put forward for development within the lifetime of the Plan. It is also noted that the development of settlements will be linked to the ability to provide adequate and appropriate critical service infrastructure to service existing and proposed developments.

The Variation provides objectives and policies at a settlement level to protect water quality and biodiversity (in particular designated sites and ecological corridors), which are welcomed. Consideration should also be given to including a commitment to integrate the County Green Infrastructure Strategy, Heritage Plan and Biodiversity Action Plan into account and also provide protection for protected habitats and species outside designated sites.

In addition to the above, there would be merit in including an overall objective also to require visual impact assessments be required for proposals which may adversely impact on areas of significant landscape character, including townscape, streetscape, coastscape, etc.

Where references are made to the preparation of master plans, framework plans, land use and transportation studies/strategies for certain settlements described, the requirements of the SEA, Habitats and Floods Directives respectively should also be taken into consideration and integrated as appropriate.

The comments in relation to the Environmental Report are more specific and are summarised as follows:

Non Technical Summary

Consideration should be given to describing the likely evolution of the environment without implementation of the Variation.

Existing Environment

In the Environmental Baseline of the Plan Area, consideration should be given to including a reference in relation to population thresholds and target populations for mandatory SEA in relation to Local Area Plans.

Environmental Objectives

The Agency acknowledges the proposed amendments to the Strategic Environmental Objectives (SEOs); in particular the strengthening of biodiversity and material assets related SEOs.

Assessment of Environmental Effects

While the alternatives put forward for consideration are noted, it is not clear whether a preferred alternative development scenario from the three put forward has been selected. This should be clarified in the context of ensuring that the preferred alternative is assessed against the policies/objectives of the proposed Varied Plan.

Consideration should also, however, be given to clarifying how the full range of environmental effects of the implementation of the Plan, as set out in the SEA Directive and Regulations, i.e. "secondary, cumulative, synergistic, short, medium and long-term, permanent and temporary, positive and negative effects" have been assessed and documented.

It is noted for certain settlements such as Maynooth that the assessment has identified both policies and objectives with potential conflicts between protective policies and development policies. Recommendations to address these conflicts should be considered where appropriate. It

should be ensured that the Variation provides appropriate mitigation measures to minimise or avoid where possible significant effects on environmental sensitivities in the Variation area in implementing the Variation.

The potential for cumulative effects in combination with other relevant Plans / Programmes and Projects should also be taken into consideration.

Mitigation Measures

In is noted that residual impacts have been identified as being likely to remain in relation to certain settlements in seeking the implementation of the Variation.

In relation to Moynalty, it is noted that it is intended to progress an existing residential development which is distant from the village centre and separated by unzoned undeveloped agricultural lands. In the context of ensuring consistency with the Core Strategy, there would be merit in considering, as appropriate, re-zoning or de-zoning these lands as strategic land reserve rather than keeping as residential land use given that they will not be developed in the lifetime of the Variation and appear to be in conflict with the Core Strategy approach to sustainable development.

In relation to Pace, the requirements of the SEA and Habitats Directives in particular should be taken into account in relation to the consideration for a land use and transportation strategy to take into account the proposed 'Level 2 Retail Centre'.

The inclusion of Table 9.1: Summary of Mitigation Measures and Residual Impacts is acknowledged. This table clearly shows the proposed new and amendments to existing policies and objectives and also highlights the settlements affected and any potential residual impacts which may arise.

Monitoring Measures

Consideration should be given to the inclusion of further detail on the monitoring frequencies where possible for the various environmental criteria specified. While the monitoring programme sets out the various sources of data, the actual departments responsible for collecting, collating and analysing the data should be identified as soon as possible after the Variation has been adopted.

Manager's Response

The comments and recommendations of the EPA are noted. The recommendations of the EPA in respect of the content and assessment methodology of the draft Environmental Report are noted and will be incorporated into the final Environmental Report and SEA Statement.

In respect of the assessment of policies and objectives, the following comments are made

Mavnooth

The potential for conflict between the protective policies and development policies has been noted in the assessment. Mitigation measures have been proposed in the assessment in so far as they can be effective. The potential for residual impact remains and the requirement for ongoing monitoring is stated.

Moynalty

The potential for residual environmental impact remains.

Pace

The objectives Pace OBJ 1 and Pace OBJ 2 have been amended so that the IFPLUT will inform the manner in which the area will develop. This will be beneficial to the environment.

Recommendation

The recommendations of the EPA in respect of the content and assessment methodology of the draft Environmental Report are noted and will be incorporated into the final Environmental Report and SEA Statement.

In particular, the following amendments will be made

- further description of the likely evolution of the environment without implementation of the Variation:
- reference to SI No. 201 of 2011 relating to thresholds and target populations for mandatory SEA;
- the consideration of alternatives will be clarified demonstrating which strategic option is preferred;
- The assessment of the variation will be amended to clarify the nature of potential environmental effects, e.g. secondary, cumulative etc.;
- Clarification that the assessment considers the potential for cumulative effects in combination with other relevant plans / programmes and projects, and;
- Further detail on monitoring frequency and sources.

Submission 1077 Sheridan Woods Architects & Town Planners

Summary of Main Issues Raised

The inclusion of the indicative Master Plans for Crossakiel, Rathcairn and Gibbstown is welcomed by the firm who prepared these Local Area Plans on behalf of Meath County Council. It is also requested that the Master Plan which was also prepared for the Carnaross Local Area Plan be included to provide guidance for its future development. If the Master Plan is no longer considered to conform to the Local Authority vision for the area, it is recommended that an objective be included to prepare an urban design statement Master Plan for the village to ensure an overall coherent approach to the future development of the village.

In addition, it is recommended that an objective be included to prepare a Master Plan for other villages to ensure coherent development of these centres and in the interest of protecting and enhancing their unique character.

Manager's Response

The Council welcomes the submission received. It is recommended to include the urban design detail for Carnaross which is presently contained in the Carnaross Local Area Plan into the Written Statement for Carnaross similar to that of the other urban centres listed.

Section 9.6.16 of the County Development Plan provides details on Village Design Statements. A Village Design Statement (VDS) is a non-statutory local development framework, compiled by the local community to establish a vision for the future of their village. It is an objective of the County Development Plan 2013-2019 to:

CH OBJ 25

To support proposals from local communities and community organisations which seek to have a Village Design Statement for a particular village drawn up through a process involving community participation, the Heritage Council and the Council's Planning Department, subject to availability of resources.

It is therefore considered that the County Development Plan 2013-2019 effectively provides for the preparation of the suggested Master Plans for villages subject to the availability of resources.

Recommendation

To include the following as an Appendix to the Carnaross Written Statement and to include a new policy in the Written Statement:

UD POL 1	To have regard to the Urban Design Framework for Carnaross contained
	in Appendix I of this Written Statement in the design and assessment of
	development management proposals brought forward during the life of
	the County Development Plan on lands identified for land use zoning
	objectives only.

Appendix to Carnaross Written Statement: Urban Design Framework

An Urban Design Framework for Carnaross was developed as part of the 2009 Local Area Plan. Whilst the extent, nature and phasing of the land use zoning objectives are no longer consistent with those contained in the 2009 Local Area Plan for the Village, there is considerable merit in retaining the urban design framework for the village. The Indicative Master Plan will continue to provide guidance for development management proposals in the village for the life of the County Development Plan.

The Carnaross Master Plan is illustrated in the following drawings with respect to each character area. The Master Plan show new streets and spaces, appropriate building forms and landscape proposals. The Master Plan is indicative only and is intended to provide design guidance with respect to the built form and layout of the village.



Opportunity Sites

There are several sites within the village that have the potential to make a significant contribution to the development of Carnaross. These sites include undeveloped lands to the north east of the village crossroads, backland sites to the north west, south west and south east of the village crossroads, the mart and employment and enterprise zoned lands opposite the mart and the low density zoned lands to the west of the village. Additional design guidance has been prepared with respect to these sites and is described in the following sections.

Undeveloped lands to the north east of the village crossroads (Character Area 1)

These lands represent a significant landholding centrally located within the village. The site fronts onto the Kells and Moynalty roads. The development of these lands should seek to establish an attractive, vibrant and identifiable village centre whilst respecting the innate characteristics of the traditional buildings within the existing village.

In this regard, development proposals for these lands should seek to:

- Provide for a mix of uses and active ground floor frontage along the Kells road
- Establish a continuous building line and a strong sense of enclosure along the Kells road and part of the Moynalty road
- · Respect the human scale and massing of traditional buildings within the village
- Generate a strong solid to void relationship between walls and openings
- Provide for vertically proportioned openings
- Employ traditional materials and finishes such as rendered walls, pitched slate roofs and timber windows and doors
- Provide for on and off-street structured car parking along the Kells road

Innovative design solutions which deviate from traditional building typologies and materials and finishes shall only be considered where a high standard of architecture is proposed. The area to the north of the site should provide for residential development and a centrally located village community. New houses should be located along well defined and landscaped streets or lanes comprising structured on-street car parking. Off street car parking should be provided behind the building line and should ideally be screened from the street. Public open space requirements associated with any proposed development on this site should seek to complement the potential expansion of Carnaross National School and associated playing fields or areas.

Backland sites to the northwest, southwest and south east of the village crossroads (Character Area 1)

The low grade uses to the northwest and southwest of the village crossroads may in time relocate to the mart related uses zoned lands to the south of the mart. Within this context new development should seek to consolidate these quadrants by providing access lanes from the Kells and Moynalty road which complete the associated urban blocks. Similarly, the quadrant to the south east of the village crossroads should be consolidated to provide for well defined streets and spaces and the enhancement of the car park adjoining the Carnaross Inn in particular. Proposed development should front onto the Kells and Moynalty road and new access lanes and provide for attractive streets and spaces. Development should be of a scale and massing that reflects adjoining buildings and should employ traditional materials that reflect the vernacular of the village. The car parking adjoining the Carnaross Inn should be subject to environmental improvements and could be developed in conjunction with the Parish Hall to provide for a multifunctional civic space and landmark community building.

Carnaross Mart and adjoining mart related uses zoned lands (Character Area 3)

The Carnaross Mart has an important social and economic association with the village which is substantiated by its strong presence on the Kells road. Notwithstanding this, environmental improvements to the front of the mart would improve the visual amenity of the area. The expansion of the mart should seek to provide for structured off-street parking and loading areas. A landscaped buffer between the mart and the Kells road comprising native trees would also significantly enhance the visual amenity of the area. Employment uses which compliment the mart functions are considered appropriate on lands to the south of the mart. Development proposals should seek to absorb car parking and delivery areas within the site. Structured parallel on-street car parking may also be appropriate. The scale and massing of new buildings should be modest and in keeping with the rural context of the site. Courtyard arrangements which provide frontage to the Kells road whilst minimising the visual impact of such buildings are encouraged. Low density residential zoned lands to the west of the village (Character Area 2)

These lands are located to the west of the village opposite the River View estate and adjoining individual detached houses. In order to consolidate development within this character area low

density housing which reflects the form, scale and layout of the local vernacular is encouraged. The traditional farmhouse cluster typology where buildings are loosely arranged around a central courtyard space is considered particularly appropriate. The landscaping and boundary treatment of individual sites should seek to incorporate and augment existing natural features such as stone boundaries, trees and hedgerows.

SEA/AA Comment

Screened out; no comment required.

Submission 1081 Office of Public Works

Summary of Main Issues Raised

The OPW welcomes the work carried out in the Meath Development Plan and its proposed draft Variation No. 2, in particular the sources used for flood risk assessment, identification of flood risk, uncertainty of such data, effects of climate change and the application of the 2009 Planning System and Flood Risk Management Guidelines for Planning Authorities planning principles. In so doing, it is considered that a good standard Flood Risk Assessment Stage 2 has been attained.

Section 2.4 of the Strategic Flood Risk Assessment (SFRA) states that the Flood Zones indicate flooding from fluvial and tidal sources and do not take other sources, such as groundwater or pluvial, into account, so an assessment of risk arising from such sources should also be made. It would be welcomed if pluvial and groundwater flood risk areas were illustrated.

Reference within the SFRA to the range of flood risk map data sources used is welcomed, including a walk over survey when required. It would be welcomed if a walk over survey was carried out for all areas where there is uncertainty regard flood risk, e.g. Kildalkey where it appears the use of PRFA flood mapping and Enfield which appears to have had historical pluvial flooding.

The inclusion of Section 3.2.2, Comment on Accuracy and Detail of Assessment and Table 3-3 Model Data used in the Preparation of SFRA Flood Zone Maps is welcomed by the OPW. The comments made in relation to the SFRA's further flood risk assessments, in an attempt to reduce uncertainty e.g. for Ballivor and Longwood, is also welcomed. It is suggested that more detail can be highlighted with regard to the limitations/uncertainty of each model approach in developing the flood map extents e.g. around structures such as bridges/culverts. In particular e.g. through Ballivor no flood risk is identified though there are culverts downstream of zoned residential areas.

It is welcomed the application of the Planning Guidelines Sequential Approach and where applicable, Justification Test. It is suggested the application of these planning principles is carried out for all areas e.g. Drogheda South environs. The SFRA states that E2, G1 and A2 zoned areas are situated at some level of flood risk. For such areas it is suggested that the application of the planning principles including the Sequential Approach and where applicable the Justification Test is carried out and detailed at this stage in the planning process.

Manager's Response

In response to the specific issues raised in the OPW submission, fluvial and groundwater risk are not specifically illustrated on the maps included in the Strategic Flood Risk Assessment which informed the preparation of the draft Variation as the amount of spatial information displayed is already significant. Areas where there is significant groundwater or pluvial risk are outlined in the text. In addition, at development management stage all planning applications must be subject to

appropriate screening for surface water flood risk and must comply with the recommendations of the Greater Dublin Strategic Drainage Study.

A walkover survey was completed for all settlements that were not already subject to walkover during the Flood Risk Review phase of the CFRAMS Programme or a detailed flood study.

For Ballivor and Longwood, the residual risk resulting from structural blockage can be more specifically mentioned in Section 3 and Section 5. Current recommendations already include for site specific Flood Risk Assessment at development management stage. The final Strategic Flood Risk Assessment and Management report shall be amended accordingly.

The use of the Sequential Approach and the Justification Test have been applied pragmatically and where there is limited impact to a land use zoning, risk can be managed at development management stage. This approach stipulates the avoidance of risk within an individual zoning (therefore applying the Sequential Approach) without re-zoning or de-zoning lands within the objective. It is noted that this application of the Guidelines only applies to lands within Flood Zone B and all areas within Flood Zone A have either been avoided or justified.

Recommendation

No change required.

SEA/AA Comment

No comment required.

Submission 1090 National Transport Authority

Summary of Main Issues Raised

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

1. Development at Pace

The Authority has consistently expressed its concern with substantial development proposals at Pace, as provided for in the Dunboyne Clonee Pace LAP. It is the view of the Authority that future employment development in this area should be focused on Dunboyne / Dunboyne Rail Station rather than at the Pace motorway interchange.

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

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

The Authority also considers that the land use objective Pace OBJ 2 ("To provide for strategic employment use predominantly for high end office development on lands adjacent

to the emerging preferred location for the Level 2 Centre at pace on a phased basis within the life of the County Development Plan....." is inappropriate and should be omitted. This proposal is contrary to the Authority's policy contained in the Integrated Implementation Plan 2013-2018 which states that "high volume, trip intensive developments, such as office and retail, should primarily be focussed into Dublin City Centre and the larger Regional Planning Guidelines (RPG) higher order centres within the Greater Dublin Area".

Recommendation

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

It is recommended that Pace OBJ 2 be deleted.

2. Stamullen Employment Zoning

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

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

Recommendation:

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

3. Maynooth Employment Zoning

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

Recommendation:

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

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

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

Recommendation

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

5. Dunshaughlin and Ratoath Road Objectives

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

Recommendation

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

6. References to Córas lompair Éireann

References to Córas lompair Éireann in the text of the variation should be amended to read National Transport Authority.

Manager's Response

1. Development at Pace

The Manager would respectfully direct the reader to the response to the submission of the National Roads Authority (No. 1043) in relation to Pace (Pace OBJ 1 & 2 refers). It is considered that the suggested amendments would accede to the requirement for an evidential plan led approach to development in this area.

The Council notes the request from the NTA to amend the wording of CER POL 1 and CER OBJ 2 to make these objectives conditional on their consistency with an agreed integrated land use and transport plan. It is considered more difficult to accede to the NTA's request in respect of CER POL 1 (lands at Piercetown) and CER OBJ 2 (lands at Portan, Clonee) as there was no link in the existing policy framework of the Local Area Plan to the undertaking and completion of the Integrated Framework Plan for Land Use & Transportation. The Council have already amended the land use zoning objective for the latter lands and this reduces the range of uses which would previously have been indicated as being generally acceptable or open to consideration. It is suggested that a slight amendment be included for both CER POL 1 and CER OBJ 2 in this regard. Furthermore, an agreed roads layout has been agreed with respect of the lands at Portan, Clonee noting that no planning consent has been brought forward or an agreed funding methodology agreed to provide for same.

It is not considered necessary at this juncture to amend the wording of lands which have been identified for employment at Piercetown or Portan, Clonee. The Council considers that there is presently no basis to reconsider such objectives until the IFPLUT has been completed in accordance with the strategy presented in the County Development Plan. The Manager has indicated in her response to the NRA submission the basis for reconsidering the lands at Pace on the basis of the wording of the objective presently contained in the Local Area Plan allied to the direction contained for this area in the County Development Plan Volume I. No such discretion is afforded at present with respect to the lands at Piercetown or Portan, Clonee.

EMP OBJ 6 of the existing Dunboyne Clonee Pace LAP seeks

To provide a single landmark building of significant architectural merit to replace the existing Herbal Medicine facilities in Dunboyne. This building shall be accommodated on lands, outside the designated Flood Plain lands, identified on the land use zoning map.

This is considered a local objective which is not dependant in any way to the outcome of the IFPLUT.

2. Stamullen

It is accepted that the Regional Planning Guidelines (RPGs) do not specifically designate Stamullen in the settlement hierarchy. Stamullen is identified as a Small Town in the Co. Meath Settlement Hierarchy. The RPGs provide that "relatively small and locally financed businesses are expected to locate in Small Towns; however, other economic investment opportunities should be considered and supported where sustainable and in keeping with the size and services of the town." The County Development Plan also indicates that any change in the status of Stamullen to accommodate an expanded economic role in the regional hierarchy will be advanced through future reviews of the RPGs and is linked intrinsically to the development of a deepwater port near Gormonston. This is considered reasonable.

The Stamullen Written Statement provides for an employment zoning of 16.1 hectares in Phase I, developed in accordance with an approved Framework Plan as required pursuant to LU OBJ 2. This presents a significant constriction on the extent of lands presently available for employment generating uses within and adjoining the City North Business Campus. The Council are satisfied that improvements to the connectivity between Stamullen and these employment lands will ensure greater employment opportunities being provided locally for the 3,130 local residents whilst encouraging a more sustainable development centre than presently exists. The Council disagrees with the NTA that the development of the subject lands should be conditional upon the delivery of the deepwater port and any changes to Stamullen in the RPGs. No such restrictions are proposed with respect to similar settlement in the hierarchy such as Enfield, Oldcastle, Ratoath or Athboy. The scale of employment lands identified in Stamullen is considered commensurate to that required for a Small Town with a population in excess of 3,130 population allied to its positioning on the M1 Economic Corridor. A comparison of the extent of lands identified for employment uses in other Small towns would further validate this opinion.

3. Maynooth Environs

The Council notes the comment that any proposal to locate intensive office based development in Maynooth Environs is inconsistent with the Authority's policy on the location of employment, as presented in the Integrated Implementation Plan 2013-2018. It is respectfully indicated that this remains a draft Implementation Plan by the NTA to their draft Transport Strategy for the Greater Dublin Area. The policy content of the draft Implementation Plan is therefore non statutory and not binding on this Council in the performance of their statutory functions.

The Council is aware of and acknowledges the challenges in integrating land use and transport in the Maynooth Environs. However, the Maynooth Environs Written Statement gives effect to the strategic direction for Maynooth Environs as contained in the Economic Strategy of the County Development Plan. Strategic Policy SP 5 of the Written Statement indicates that "Mobility Management of future employees shall be to the fore in establishing the agreed quantum of employees which can be accommodated within individual locations predicated on maximising public transport opportunities and the use of innovation in reducing associated carbon footprint. The suitability of these subject lands to accommodate intensive office based development will have to be assessed in a Development Management context." (Emphasis added) It is considered that there are sufficient safeguards built into the proposed policy framework may satisfy the

concerns of the NTA noting that they retain the right to comment on any development management proposals advanced in said lands.

4. Employment Zonings

The County Development Plan 2013 – 2019 is the primary planning policy framework which will guide development across the County. The Council is satisfied that the County Development Plan 2013 – 2019 is consistent with both the Regional Planning Guidelines 2010 – 2022 and the National Spatial Strategy which are the higher level spatial plans referred to in legislation. The submissions from both the Regional Planning Authority and Spatial Policy Unit of the Department of the Environment, Community and Local Government, whose respective role includes ensuring compliance of local policy frameworks with both of these higher level policy frameworks, are supportive of Variation No. 2 without exception.

Recommendation ER 3 of the RPGs seeks to encourage mixed use settlement forms and sustainable centres, in which employment and residency are located in close proximity to each other and strategic multi-modal transport corridors, which promote a choice of sustainable travel modes, green travel choices and to arrest long distance commuter trends and congestion.

The Council would respectfully indicate that they have reduced the extent of lands identified with an enterprise and employment land use zoning objective in all of the settlements listed which is available within the life of the current County Development Plan with the exception of Longwood although the imposition of Flood Risk considerations on said lands will reduce the extent of land which can be developed therein. In some instances the extent of lands which have been identified as Phase II are considerable e.g. Oldcastle, Kilbride & Carlanstown. In other centres, such as Crossakiel and Rathcairn, there are sufficient lands identified to provide for future expansion of existing established and successful companies who offer valuable local employment opportunities. The RPGs indicate for example in relation to Small Towns (includes Athboy, Enfield, Oldcastle and Stamullen) that "such economically active independent towns, with less dependence on commuting for population growth, should be recognised in the Development Plans for their key local importance and be supported in this role. Towns of this type include Baltinglass, Co. Wicklow, Oldcastle in County Meath and Enfield/Johnstown Bridge in Kildare."

It is considered that the comments from the NTA in this regard are generalised which respectfully fail to demonstrate an understanding of the extent of lands presently zoned in the respective Local Area Plans, the scale of existing employment levels in each centre, the impact which adhering to the Strategic Flood Risk Assessment has had on lands already zoned and the fact that the Council's options of dealing with an excess of land use zoning through a variation are more limited than through preparing a new plan. The Council are satisfied that they have realised ED OBJ 2 of the County Development Plan through Variation No. 2 and that the quantum of lands identified for release are appropriate in each instance for the respective category of development centre.

5. Dunshaughlin & Ratoath Road Objectives

In relation to the inclusion of major distributor roads for Dunshaughlin and Ratoath, it is considered that a review of the infrastructure provisions previously contained in the individual Local Area Plans was not included nor required to realise CS OBJ 2 of the County Development Plan, the primary stated purpose of this proposed Variation.

There is a separate objective of the County Development Plan; TRAN SO 1 refers, to prepare local transport plans for a limited number of centres which includes Dunshaughlin in accordance with the NTA's draft Transportation Strategy. These centres correspond with "Designated Towns and Districts" as identified in the NTA Draft Strategy. Ratoath is not identified as either a

Designated Town or District. Meath County Council does not consider it necessary therefore to prepare a Local Transport Plan for Ratoath. It is considered that such matters can be assessed further in the context of the review of the Dunshaughlin & Ratoath Local Area Plans which is scheduled in 2015. In the interim, it is not recommended to remove either of the indicative proposed major distributor roads from the land use zoning objectives maps.

6. References to CIE

All references to Córas lompair Éireann in the text of the variation will be amended to National Transport Authority.

Recommendation

1. Amend Additional Policies for Dunboyne Clonee Pace Local Area Plan as follows:

Amend CER POL 1 as follows

CER POL 1 Lands at Piercetown

To ensure that lower density employment uses such as industry, warehousing, distribution and logistics, to include ancillary office space, are developed at the 'Piercetown' lands as indicated on the land use zoning objectives map. Any uses proposed shall have regard to and be consistent with the range of uses indicated as being appropriate to E2 "General Industry & Employment" Category 1 (Primary & Secondary Economic Centres) as provided for in Volume I of the County Development Plan.

Amend CER OBJ 2 as follows

CER OBJ 2 Lands at Portan, Clonee

It is a requirement of the Meath County Developments Plan that the development of the employment generating lands at Portan, Clonee land use zoning objectives map for Clonee will be subject to the provisions of a Framework Plan to be agreed with the Executive of the Planning Authority and specific servicing and access arrangements set out in the Movement Section of the Dunboyne Clonee Pace Local Area Plan (2009). Any uses proposed shall have regard to and be consistent with the range of uses indicated as being appropriate to E2 "General Industry & Employment" Category 1 (Primary & Secondary Economic Centres) and E3 "Warehousing & Distribution" as provided for in Volume I of the County Development Plan.

2. Amend Athboy Written Statement

MA POL 7

To work in conjunction with Córas Iompair Éireann (CIE) National Transport Authority to provide bus stops and accompanying shelters within the Town Centre to serve all bus users.

3. Amend Carlanstown Written Statement

MS OBJ Part h)

To work in conjunction with Córas Iompair Éireann (CIE) National Transport Authority to provide a public bus service to Carlanstown connecting it with surrounding urban centres. It is also important that the necessary associated infrastructure, such as bus stops and accompanying shelters on each side of Main Street within the Village Centre, be provided in conjunction with such a service.

4. Amend Nobber Written Statement

MA POL 4

To work in conjunction with Córas Iompair Éireann (CIE) National Transport Authority to provide bus stops and accompanying shelters within the Village Centre on each side of Main Street..

SEA/AA Comment

Screened out; no comment required.

Submission 1099 Dublin & Mid East Regional Authorities

Summary of Main Issues Raised

The Implementation Group for the Regional Planning Guidelines for the Greater Dublin Area 2010-2022 welcomes the opportunity to make a submission regarding Variation No. 2 of the Meath County Development Plan 2013-19. The majority of the submission provides a detailed summary of the nature of the variation and its relationship with the recently adopted variation No. 1 to the County Development Plan.

It is considered that the Variation has used a robust evidence based approach to determining the sequential priority of residential lands to be released for development. This approach includes various factors relevant to the sites in order to prioritise those sites which should be developed in the lifetime of this County Development Plan. These factors take into account National, Regional and Local Planning Policy and Guidelines and as such should be the sole assessment tool to determine the housing allocation of each settlement, in accordance with the Core Strategy and the figures in Table 2.4 of the County Development Plan.

The approach of phasing employment zoned lands is based on a similar evaluation analysis as applied for the residential lands, in line with the objectives of the Core Strategy of the Meath County Development Plan is welcomed. The employment strategies designed to support economic development in the County are noted and should seek to align with the policies of the regional authority and the relevant national authorities.

Given the nature of the proposed variation, to accord with the (varied) objectives of the County Development Plan and the detailed housing allocations of the Core Strategy which in turn comply with the Regional Planning Guidelines 2010-2022, the Regional Authority has no objection in principle to the variation.

It is recommended, however, that consideration is given to a monitoring mechanism to ensure the build out of zoned housing lands and new residential development over the life of the County Development Plan is in accordance with the targets and policies established within the Regional Planning Guidelines. This may also be useful in the context of sequential planning and overall land requirements, particular consideration should be given to zoning objectives, in the event that extant permissions wither on peripheral housing lands within a particular area.

Manager's Response

The comments received from the Implementation Group for the Regional Planning Guidelines for the Greater Dublin Area are welcomed.

The Planning Authority has put in place a monitoring programme with respect to of all objectives contained in the County Development Plan which includes the build out of zoned land. In addition, it is a requirement of all Planning Authorities to submit an annual return of housing activity on residentially zoned lands within their administrative area to the Department of the

Environment, Community and Local Government. This is the primary tool which is used to monitor the implementation of planning permission for multiple residential unit developments which is referred to in the submission received. This data base is updated at regular intervals by the Planning Authority.

Recommendation

No change required.

SEA/AA Comment

No comment required.

4. Dunshaughlin Area Submissions Received

4.1. Kilbride

Submission 1089 Robert Rennicks

The submission relates to the large plot of E2 "Enterprise and Employment" zoned lands located to the south of the village.

It is submitted that the existing petrol station and shop are currently closed and proposed that the text of the variation reflect this. It is further submitted that an increase in population in the village is required to maintain the vitality of the village and local services such as the school and the GAA.

The designation of the landowner's lands with an E2 "Enterprise and Employment" land use zoning objective is welcomed and supported, and accords with the landowner's desired vision for development. However the lack of reference to the provision of a "data centre" on page 23 is however a cause of dissatisfaction and it is hoped that this is a typographical error. It is suggested that the site is ideally located to cater for a Data centre, these services are critical for the attraction of Foreign Direct Investment which is a key driver of the Regional and National economic growth.

The Council is urged to approve the Written Statement and Zoning Objectives for Kilbride as presented in the draft Variation No.2, subject to the following modifications:

- Update text to reflect fact that the petrol station and convenience store are not in operation, and;
- ii) Include a specific local objective on the subject site "to provide for the development of a data centre(s) and associated related industries".

Manager's Response

The issue of the petrol filling station and convenience shop currently being closed has been addressed in the previous submission and an amendment is suggested to correct same.

The submitter's comments are noted with regard to the lands with an E2 "Enterprise and Employment" land use zoning objective to the south of Kilbride. The Council has no difficulty in acceding to the request in relation to a specific mention of the provision of a data centre on the subject lands. Reference was already contained in the Written Statement to such a use being considered as acceptable in principle.

Recommendation

To amend the Written Statement for Kilbride to include Land Use Objective LU OBJ as follows:

LU OBJ

To require that the lands identified with an E2 "General Enterprise & Employment" (Category 3) land use zoning objective employment uses should be developed on a phased basis in accordance with an agreed Framework Plan. The first phase of the development of said lands shall relate to the lands with road frontage onto the Hollystown Road and the lands immediately south of and contiguous to the existing manufacturing facility. Development within this site may include the provision of a Data Centre and associated related industries set in open parkland with extensive landscaping and shall provide for a high architectural standard of layout and building design.

SEA/AA Comment

Environmental issues are adequately addressed through existing protective policies and objectives.

Submission 1096 & 1102 Denis O'Driscoll

The submission refers to 1.6 hectares (3.95 acres) of A2 "New Residential" zoned land centrally located within Kilbride. The landowner is 'disappointed' that his lands have been de-zoned to 'F1 – To provide for and improve open space for active and passive recreational amenities'. Pre planning has occurred in the recent past on these lands and the preparation of a planning application for said lands is underway.

It is suggested that Kilbride is regarded as having a metropolitan location. It is further stated that the lack of residential development within the village has stifled the existing two main businesses in the village i.e. filling station / shop and public house. It is further suggested that the GAA and school have survived based on the support of the greater area. The submitter considers that the demand for housing within this area would far outstrip the existing zonings in the 2009 LAP not alone those identified in the proposed variation.

It is submitted that the existing petrol station and shop are currently closed and proposes that the text of the variation reflect this. It is further submitted that an increase in population in the village is required to maintain the vitality of the village and local services such as the school and the GAA club.

It is acknowledged that the Development Plan and Core Strategy seek to avoid commuter led development. It is suggested that the residential development in village centres is a necessary land use that should be provided for. Zoned lands are preferable to one off housing on the periphery of such villages.

It is stated that the existing school is at risk of being withdrawn; a residential population within immediate proximity would justify its retention. The landowner has provided open space previously to the school.

The landowner argues that the Core Strategy is too prescriptive. It is purported that the proposed Variation in terms of the changes to residential zoning to the north of the school and to the west of the main road through Kilbride does not represent sustainable planning and is contrary to the orderly and sequential development of the village.

The submitter is concerned about the level of open space required and the need to remove residential zonings to facilitate same. It is suggested that the existing level of open space is sufficient to cater for the village.

The landowner states that he is in a position to submit and develop and application on these lands in the short term and urges that the Council reconsider the amended zoning objective for the land.

Manager's Response

The existing lands within and adjacent to the development boundary of Kilbride has been subject to a detailed Strategic Flood Risk Assessment and Management Plan which has informed the proposed Variation. In accordance with 'The Planning System and Flood Risk Management Guidelines for Local Authorities',, lands which are at risk of flooding are not proposed for a land use zoning objective which permits vulnerable land uses such as residential development. The lands located to the north of the existing primary school are located within Flood Zone A & B and as such are not suitable to accommodate vulnerable development. The area of land at risk of flooding has therefore been altered to water compatible use i.e. F1 "Open Space" land use zoning objective.

The remainder of the site which has retained the A2 "New Residential" land use zoning objective has been included within Phase II i.e. post 2019. It is considered that the selected proposed Phase I site is appropriately located adjacent to existing commercial and educational services within the village. The site is therefore more sequentially preferable for residential development than any other such sites within the village.

With regard to the quantum of residentially zoned lands proposed for release, it is important to note that the Settlement Strategy of the County Development Plan 2013-2019 has identified a surplus of residentially zoned lands within most urban centres in the County, including Kilbride, and in keeping with the requirements of the Regional Planning Guidelines has outlined the number of units permissible within each settlement. The proposed quantum of lands within Phase I are considered sufficient to cater for the required number of units for Kilbride; any increase would be contrary to the provisions of Table 2.4 of the County Development Plan

It is accepted that the existing petrol station and shop are currently vacant and a minor amendment to the Written Statement can rectify this omission.

Recommendation

To amend the text of the Written Statement for Kilbride, Section 03 Land Use as follows:

"Commercial facilities in the village consist of a petrol station and associated convenience shop both of which are presently closed, a public house and Rennicks sign manufacturers."

SEA/AA Comment

Screened out; no comment required.

4.2. Kilcock Environs

Submission 1056 Patrick Burke Chairman of Grounds Committee on behalf of Blackhall Gaels GAA Club

Summary of Main Issues Raised

The submission refers to the lands zoned for community uses in the southeast part of the Kilcock Environs in the Local Area Plan of 2009. It is proposed to re-locate these community zoned lands in the Proposed Variation to a location further to the west, adjoining the residential lands which are included in Phase 1. The submission states that the existing location was identified as the preferred location to accommodate the Club's pitches and clubhouse facilities as far back as 2001. Around the time of the preparation of the 2003 Kilcock LAP it was agreed with the landowner that a serviced site would be made available to facilitate the Club's future development needs and a legal agreement was entered into. The Club has incurred expenditure in the design and layout of the proposed pitches and club house facilities with the intention of lodging a planning application with the full details of the proposed layout of the site at such a time when the works for delivering the new distributor road of the site would allow for the formation of an access spur to the Club grounds and the development of the site has progressed to an appropriate point. The Club oppose the proposed change in location of the community zoned lands and request that they revert to the position shown in the 2009 Local Area Plan.

Manager's Response

The re-location of the lands identified with a G1 "Community infrastructure" land use zoning objective in this area arose from the desire to ensure that such lands were released in Phase 1 along with residential lands and to locate sports and recreational facilities in proximity to other community facilities and the neighbourhood centre. It is evident from the submission that plans are advanced to secure the development of facilities for Blackhall Gaels in this locale. In light of this, it is considered that the zoning of the G1 lands in question should revert to that shown in the land use zoning objectives map for the Kilcock Environs Local Area Plan 2009. The residential lands in Phase 1 east of the G1 zoned lands in the proposed variation map should be moved westwards to adjoin Character Area 1. This will require associated amendments to the text of the Written Statement for the Kilcock Environs.

Recommendation

It is recommended to make the following amendments to the Kilcock Environs Written Statement and land use zoning objectives map:

- Re-locate the lands identified with a G1 "Community Infrastructure" land use zoning objective to an easterly position in the environs area (consistent with their location in the Kilcock Environs Local Area Plan 2009) and relocate lands identified with a A2 "New Residential" land use zoning objective Phase 1 lands in Character Area 2 westwards to abut Character Area 1.
- 2. Amend the text in Section 6 Community Facilities and Open Spaces as follows:

"Lands extending to approximately 3 3.18 hectares have also been identified for G1 "Community Infrastructure" land use zoning objective at the eastern end of the Kilcock Environs as part of the lands identified for Phase I residential land use. These shall be used to provide for associated uses for the newly established residential uses, including sporting and recreational facilities which should be available for use by the school."

3. Amend Objective RD OBJ 2 as follows:

RD OBJ 2

To accommodate, on the lands identified on the land use zoning objectives map to the north of the Rye Water River, a maximum of 150 residential units. The lands identified for G1 "Community Infrastructure" land use zoning objectives inside the boundary of this objective shall be released for development as part of the residential scheme. Any planning application for development on these lands should include a Master plan showing the proposed layout for the entire site as illustrated on the land use zoning objectives map, including the G1 lands. This should make provision for connectivity between Character Area 1 and Character Area 2 the lands identified with a G1 "Community Infrastructure" land use zoning objective and adjoining lands to the west, the subject of Objective RES OBJ 1 above.

4. Amend the text in Section 4 Residential Development as follows:

"Two sites have been included in Phase 1 to accommodate the household allocation. The first of these adjoins the R125 (Dunshaughlin road) to the west and extends eastwards. This site should include provision for a primary school of 1.6 hectares, a neighbourhood centre and can accommodate a maximum of 250 residential units. Any planning application for development on these lands should include a site layout plan showing the proposed layout for the entire site as illustrated on the land use zoning objectives map. The layout should provide for the clustering of the primary school site and the neighbourhood centre with the lands identified for G1 "Community Infrastructure" land use zoning objective to the east and connectivity, particularly for pedestrians and cyclists between Character Area 1 and Character Area 2 between these uses.

The second site in Phase 1 adjoins site 1 to the east of same. It can accommodate a maximum of 150 residential units. The lands identified for G1 "Community Infrastructure" land use zoning objective must be reserved for development as part of the residential scheme. Any planning application for development on these lands should include a site layout plan showing the proposed layout for the entire site as illustrated on the zoning map. This should allow for connectivity, particularly for pedestrians and cyclists between Character Area 1 and Character Area 2. "including the G1 "Community Infrastructure" lands. This should allow for connectivity between the G1 lands and adjoining lands to the west."

5. Amend Objective RD OBJ 1 as follows:

RD OBJ 1

To accommodate, on the lands identified on the land use zoning objectives map to the east of the R125 (Dunshaughlin road), a maximum of 250 residential units and a neighbourhood centre and to reserve of a site of 1.6 hectares for a primary school within these lands. The primary school site and neighbourhood centre shall be located adjacent to **each other** the lands identified with a G1 "Community Infrastructure" land use zoning objective situated to the east. Any application for development on these lands shall be accompanied by a Master plan illustrating the layout for the site in its entirety as illustrated on the land use zoning objectives map. The layout shall make provision for connections, particularly pedestrian and cyclist, Character Area 1 and Character Area 2. between the primary school and neighbourhood centre and the G1 "Community Infrastructure" zoned lands to the east.

SEA/AA Comment

Screened out; no comment required.

Submission 1066 Stephen Little & Associates on behalf of The Adroit Company

Summary of Main Issues Raised

The submission relates to lands at Dolanstown, part of the Kilcock Environs. The variation has proposed to include part of the lands in Phase 2 of the Order of Priority and to change the zoning of the remainder from residential to open space arising from the findings of the Strategic Flood Risk Assessment carried out as part of the proposed Variation. The submission outlines the collaborative approach that was taken to the development of the Environs area by the various landowners involved. This culminated in permission being granted for flood alleviation works and a distributor road across the Environs. The latter was based on a Flood Risk Assessment Study and included the carrying out of a Justification Test for the development of the lands. It is stated that the proposed Variation does not take account of the permitted flood alleviation measures and that there is no acknowledgement within Variation No. 2 of what account was had of the various 10 year permissions for flood alleviation works that exist in the area and which were approved by both Meath County Council and An Bord Pleanála.

It is contended that the approach taken in the Kilcock Environs differs to that adopted for Ashbourne in which lands which are zoned but have a flood risk have maintained their Residential zoning and it has been clearly identified that part of those lands as being in the "Interface with Flood Risk Zones A & B". It is requested that a similar approach be taken to the Kilcock Environs.

The inclusion of the subject lands in Phase 2 of the Order of Priority is opposed. It is argued that the lands are linked directly to the main part of Kilcock town by road and have the potential to incrementally expand the town in a south easterly direction over time. It is noted that a strategic length of the distributor road now proposed by the Council passes through the subject lands and could be delivered in tandem with residential development. Furthermore, it is posited that the owners of other lands within Phase 1 are not in a position to deliver units, thus raising the possibility of the Council not being able to achieve the household target for area. Following on from the above, the Council are invited to consider allocating a portion of the Phase 1 residential development to the subject lands.

Manager's Response

It is noted that a number of detailed submissions have been received from landowners in the Kilcock Environs which relate to the change the extent of lands identified primarily with a residential land use zoning objective arising from the recommendations of the Strategic Flood Risk Assessment which informed the proposed draft Variation. Some of these submissions are accompanied by assessments undertaken by Consulting Engineers and a couple are accompanied by a Senior Counsel opinion. There is considerable overlapping in the points raised in these submissions. It is proposed to deal with the points which overlap various submissions in this response and refer the reader to same in the subsequent responses which follow. All submissions have been responded to in order of their receipt by the Planning Authority.

The Manager acknowledges the degree of collaboration which has been entered into by the consortium of landowners / developers seeking to advance the development of the lands identified primarily with a residential land use zoning objective in the 2009 Kilcock Local Area Plan and previously in the 2001 County Development Plan. The Manager equally acknowledges the role of Meath County Council in this process over the past number of years. Further, the Manager is also keenly aware of the detailed and complicated planning history associated with the lands in Kilcock Environs which culminated in a successful outcome over the past year for the local distributor road and associated infrastructure works include a partial realignment of the Rye

Water River and re-profiling existing river banks as part of flood protection measures and provision of on-line flood storage. No detail provided in this regard is disputed.

However, the land use zoning objectives of the previous 2 no. Kilcock statutory land use plans were not subjected to the methodology now required by "The Planning System and Flood Risk Management" Guidelines for Planning Authorities, November 2009. The current Variation to the County Development Plan must have regard to these Guidelines and to the principles enshrined therein building on the Strategic Flood Risk Assessment & Management Plan undertaken as part of preparing the current County Development Plan 2013 - 2019. Development should preferentially be located in areas with little or no flood hazard thereby avoiding or minimising the risk. Development should only be permitted in areas at risk of flooding when there are no alternative, reasonable sites available in areas at lower risk that also meet the objectives of proper planning and sustainable development of the area. Where development is necessary in areas at risk of flooding an appropriate land use should be selected.

In addition, the present County Development Plan is the first plan in this county which has been subject to the requirements of the inclusion of a Core Strategy. The Core Strategy has determined (Table 2.4 refers) that a household allocation of 398 no. units be assigned to Kilcock Environs for the period of the County Development Plan 2013-2019. The Planning Authority is charged in this variation to now give effect to the requirements of Core Strategy CS OBJ 5 which seeks:

To ensure that the review of Town Plans and Local Area Plans achieve consistency with the Core Strategy of the Meath County Development Plan 2013–2019 by only identifying for release during the lifetime of the Meath County Development Plan 2013–2019 the quantity of land required to meet household projections as set out in Table 2.4.

This proposed Variation recommends which lands should be identified to accommodate this relatively modest household allocation in comparison to the extent of lands previously identified with a residential land use zoning objective and which must also have regard to the flood risk associated with various landholdings previously zoned. This methodology has been endorsed in the submission received by the Implementation Group for the GDA RPGs, the NTA and others who do not have a vested interest in particular landholdings.

As stated in the proposed variation, the identification of lands for release in Phase 1 in the Kilcock Environs largely arose "following the application of the sequential approach from the Town outwards (taken at the Town Square), proximity to public transport corridors and proximity to educational facilities". The lands referred to in this submission are located further from the town centre and associated facilities than other residential zoned lands in the Kilcock Environs. Consequently, they have been included in Phase 2.

Objective CS OBJ 9 in the Meath County Development Plan 2013-2019 requires that the two year progress report for the Development Plan should include details of the units permitted in the county in comparison with those allocated in the Core Strategy. This will allow Meath County Council to review the progress in achieving the household targets set out for each settlement. It should also be noted that the household allocations detailed in Table 2.4 of the Core Strategy include headroom of 50%. Therefore, allowance has already been made for situations in which some lands may not come forward for release during the lifetime of the Development Plan.

This submission was also referred to JBA Consulting who prepared the Strategic Flood Risk Assessment (SFRA) Study which informed the proposed Variation. They have advised that whilst it is acknowledged that significant work has been completed to conduct a Flood Risk Assessment and Management Study (FRAMS, completed by RPS, August 2009), a Joint Implementation

Strategy (JIS), A cumulative Volume 1 Environmental Impact Statement (EIS) and associated planning applications for Kilcock, a significant proportion of the land scrutinised under the submissions is within the current natural floodplain of the River Rye Water and is predominantly greenfield land. The principle of designing flood management works to reduce floodplain extent and facilitate residential zoning and subsequent development within such lands was explicitly deterred in the Section 28 Guidelines "The Planning System and Flood Risk Management Guidelines for Planning Authorities" (November 2009).

Despite the history surrounding Kilcock Environs, the stated position in the SFRA and draft Variation 2 of the Meath County Development Plan is consistent with the aforementioned Planning Guidelines. It is noteworthy that the publication of the Planning Guidelines represents a material change in circumstances since Meath County Council originally considered the individual planning applications for the lands in question which were subsequently refused on appeal by An Bord Pleanála. Similarly, the Kilcock Environs Local Area Plan 2009 - 2015 was adopted in April 2009 prior to the publication of the Planning Guidelines and the zoning therein was therefore not subject to SFRA or formal application of the Planning Guidelines. It is also noted that the extant permission which now applies to these lands is only for the flood management works and infrastructure, not any housing development.

To reiterate, under the Planning Guidelines; when zoning land, consideration must be given to the undefended scenario (Emphasis added). In the case of Kilcock the lands are subject to an extant permission for flood management works which have now commenced on site. However, it appears that of the 6 no. planning permissions granted, works have only commenced in relation to 2 no. sites. The permission granted by An Bord Pleanála to each applicant requires that (condition no. 3 of each permission)

No development taking access from the distributor road approved *hereunder shall be occupied until*:

a) The <u>entire flood management measures</u> (as described in the Flood Risk and Management Study for River Rye Water, Kilcock Final Report received by the planning authority on the 4th day of June, 2010) have been completed to the written satisfaction of the planning authority. (Emphasis added)

The Board, in determining all 6 no. concurrent applications in a positive manner, considered the flood mitigation / protections measures as a single entity. In the Order from An Bord Pleanála which accompanies each decision, it was stated

It was considered that the requirement for complete and orderly implementation of the flood management measures across the various landholdings could be suitably managed by means of condition (requiring full implementation of flood management measures prior to occupation of any development on the lands), as could the requirements in relation to validation of detailed design of the scheme.

It is clear therefore of their intention with the wording of Condition 3 (a) above. The flood management measures apply to all 6 no. permitted developments collectively noting that a single EIA and FRAM was undertaken for all. There is no indication to date that the other parties to this consortium intend to implement the entire flood management measures contained within their respective landholdings.

Notwithstanding that the flood management works remain largely incomplete, the works include for proposed flood walls/embankments, channel capacity improvements as well as a diversion/storage channel that includes man-made flow control structures (throttles) that are

designed to store flood volumes and release at a predetermined rate, or simply spill excess volume. The Planning Authority shall amend reference to "no works" having commenced in the Written Statement.

It is noted that advice has been sought by some of the submissions as to what is a "defence" in this situation and if it can be argued that the undefended flood zone is effectively removed by these works. In the identification of undefended areas, the Guidelines require a consideration of residual risk. Where defences are present this is straightforward, but as identified by some of the submissions it is argued that there is no residual risk and the lands can be developed, albeit they admit involving some land raising. These measures/structures were designed to a finite specification (100 year plus 20% climate change allowance) and are therefore subject to residual risk if the measures fail (such as blockage of a flow throttle or weir obstruction), or if a flood with a return period greater than the 1 in 100 year event occurs. In addition, offline storage is subject to residual risk as a result of an exceedance of design volumetric capacity. All of these measures require regular maintenance which if not continued in perpetuity will also result in a decrease in effectiveness and a subsequent residual increase in flood risk to surrounding lands. At this level of plan making, without the works in place and the lands clearly identified at flood risk; the precautionary approach should be applied and the lands re-zoned to a less vulnerable land use. The Planning Authority has therefore adhered to the clear requirements of the Planning Guidelines in their approach to land use zoning in this proposed draft Variation.

Notwithstanding the previous argument, there remains a further application of the sequential approach as a result of potentially large parts of the zoned lands lie within Flood Zone B. The Planning Guidelines recognise that land can be zoned in areas at risk of flooding, as long as the Justification Test is applied and subsequently passed. The basis for the application of the Justification Test is whether lands are within Flood Zone A (1 in 100 years) or B (1 in 1000 years). Whilst Flood Zone A has been defined by the RPS study, Flood Zone B was not defined. In this case there will still be significant areas of the land at risk from Flood Zone B, even if the impacts of the flood relief measures are considered; because the works are not designed to protect against the 1 in 1000 year event. All references made in the various submissions received refer to the Development Management Justification Test as the lands had been zoned previously although it must be qualified that they had not been subjected to the Plan Making Justification Test as the Kilcock Local Area Plan was adopted some months before the Planning Guidelines had been published.

New flood mapping for Kilcock is currently being prepared by RPS Consulting Engineers and will be published by the OPW during 2014. The mapping has been completed as part of the Eastern CFRAM and will include high quality detailed hydraulic modelling and return period flow estimates for the River Rye Water. The new CFRAM information will be a material consideration for the Kilcock Environs and as such the information and flood management measures provided by the Kilcock FRAMS (RPS, 2009) may require further review. At this stage reliance on the management measures presented within the Kilcock FRAMS may be premature.

The application of the Plan Making Justification Test for the lands identified as being at risk of flooding is therefore mandatory. As indicated within the Written Statement of the Draft Variation 2 of the Meath County Development Plan 2013-2019; it is not considered that Part 2 of the Justification Test can be positively considered as there are adequate lands at lower risk of flooding to accommodate the modest housing allocation of 398 no. units for Kilcock Environs. For the reasons stated above the land has therefore been zoned appropriately and in accordance with the Planning Guidelines.

The Manager does not accept the argument proffered that a different approach was applied with respect to lands in Ashbourne retaining their residential land use zoning objective whilst identifying the interface with Flood Zones A & B.

Variation No. 1 of the County Development Plan, CS OBJ 6 refers seeks

- i) To ensure that planning applications for residential development adhere to the requirements of Table 2.4 of this Development Plan.
- ii) The inclusion of an Order of Priority for lands with a residential land use zoning objective pursuant to CS OBJ 2, 3, 4 & 8 shall include all lands which have the benefit of an extant planning permission for multiple unit residential developments as part of the lands identified for release within the life of this County Development Plan. For clarity, this shall apply to sites with extant planning permission from the date of publication of the relevant variation (CS OBJ 2, 3 & 4 refer) and publication of new draft Local Area Plan (CS OBJ 8 refers). (Emphasis added)

This clearly refers to lands which have the benefit of planning permission for multiple unit residential developments; it does not refer to infrastructural and flood protection works as permitted with respect to the Kilcock Environs. There is no logical basis therefore to apply a derogation to the subject lands in the manner suggested.

The Council is aware of the legislative basis of the Section 28 Guidelines. The Council considers that the same requirements apply to the making of a variation as would apply to the preparation of a draft development plan. The Council would have to have formed the opinion "that it was not possible, because of the nature and characteristics of the area or part of the area of the development plan, to implement certain policies and objectives of the Minister contained in the guidelines when considering the application of those policies in the area or part of the area of the draft development plan or the development plan". The Council has formed the opinion that it is unaware of any derogation which would allow it to disregard the findings and recommendations of the Strategic Flood Risk Assessment & Management Plan undertaken to inform the preparation of the proposed draft Variation. The Planning Department therefore recommends that the proposed draft Variation and the preparation of the land use zoning maps are in compliance with the requirements of the Section 28 Flood Guidelines.

The Council does not accept that the proposed variation deprives the individual landowners / developers the permission granted by An Bord Pleanála. There is no substance to this statement. The works approved were effectively enabling works to the lands previously zoned in the Kilcock Local Area Plan in 2009 and previously in the Written Statement and Urban Detail maps of the Meath County Development Plan 2001. The Core Strategy has determined that sufficient lands be identified to accommodate 398 no. residential units for the period of the County Development Plan 2013 – 2019. The Council has identified these lands wholly within lands identified as Flood Zone C and without recourse to applying the Plan Making Justification Test. There is no basis therefore to accept the legitimate expectancy argument put forward in the submission as the adoption of the County Development Plan with specific reference to the Core Strategy contained therein effectively determined the amount of land which should be identified for residential purposes in Kilcock for the life of the County Development Plan.

Recommendation

To amend the text of the Kilcock Environs Written Statement Section 2.0 Water & Wastewater Services:

"However, no substantive development has occurred at the time of preparing this Written Statement consequent to these planning permissions which were upheld on appeal to An Bord Pleanála."

SEA/AA Comment

Screened out; no comment required.

Submission 1067 Stephen Little & Associates on behalf of Kieran Wallace & Mark Etherington, Joint Receivers of Dorville Homes

Summary of Main Issues Raised

This submission relates to lands at Balfegan, part of the Kilcock Environs. The variation has proposed to include part of the lands in Phase 2 of the Order of Priority and to change the zoning of the remainder from residential to open space arising from the findings of the Strategic Flood Risk Assessment carried out as part of the proposed variation. The submission outlines the collaborative approach that was taken to the development of the Environs area by the various landowners involved. This culminated in permission being granted for flood alleviation works and a distributor road across the Environs. The latter was based on a Flood Risk Assessment Study and included the carrying out of a Justification Test for the development of the lands. It is stated that the proposed variation does not take account of the permitted flood alleviation measures and that there is no acknowledgement within Variation No. 2 of what account was had of the various 10 Year Permissions for flood alleviation works that exist in the area and which were approved by both Meath County Council and An Bord Pleanála.

The submission notes the down-zoning that has occurred on the subject lands and the alterations in the alignment of the distributor road through the Kilcock Environs.

It is contended that the approach taken in the Kilcock Environs differs to that adopted for Ashbourne in which lands which are zoned but have a flood risk have maintained their Residential zoning and it has been clearly identified that part of those lands as being in the "Interface with Flood Risk Zones A & B". It is requested that a similar approach be taken to the Kilcock Environs.

The inclusion of the subject lands in Phase 2 of the Order of Priority is opposed. It is argued that the lands are linked directly to the main part of Kilcock town by road and has the potential to incrementally expand the town in a south easterly direction over time. It is posited that the owners of other lands within Phase 1 are not in a position to deliver units, thus raising the possibility of the Council not being able to achieve the household target for area. Following on from the above, the Council are invited to consider allocating a portion of the Phase 1 residential development to the subject lands.

Manager's Response

Please refer to the detailed response to submission no. 1066 which has been prepared as a substantive response to the various submissions received with respect to the Kilcock Written Statement & Land Use Zoning Objectives Map.

As stated in the proposed variation, the identification of lands for release in Phase 1 in the Kilcock Environs largely arose "following the application of the sequential approach from the Town outwards (taken at the Town Square), proximity to public transport corridors and proximity to educational facilities". The lands referred to in this submission are location further from the town

centre and associated facilities than other residential zoned lands in the Kilcock Environs. Consequently, they have been included in Phase 2.

Objective CS OBJ 9 in the Meath County Development Plan 2013-2019 requires that the two year progress report for the Development Plan should include details of the units permitted in the county in comparison with those allocated in the Core Strategy. This will allow Meath County Council to review the progress in achieving the household targets set out for each settlement. It should also be noted that the household allocations detailed in Table 2.4 of the Core Strategy include headroom of 50%. Therefore, allowance has already been made for situations in which some lands may not come forward for release during the lifetime of the Development Plan.

Recommendation

No change recommended.

SEA/AA Comment

No comment required.

Submission 1080 BMA Planning on behalf of Blackhall Green Homes Ltd.

Summary of Main Issues Raised

This submission is made in respect of lands at Newtownmoyaghy, in the Kilcock Environs. It objects to the approach to evaluating residentially zoned land within draft Variation No. 2 and in particular to the application of flood zones to match zoning objectives. It is argued that this approach disregards an extensive body of work completed in respect of the River Rye Water within the existing and proposed urban environment of Kilcock. It is requested that the variation acknowledges the permitted flood management works within Kilcock Environs and provides zoning objectives that reflect the approved flood management system.

The submission outlines how an integrated approach was taken to the development of the lands in the Kilcock by the landowners concerned. This involved the preparation of a Flood Risk Assessment and Management Study and Joint Implementation Strategy. Permission was subsequently granted for a distributor road and flood managements works in the Environs.

The submission is accompanied by an assessment of the area of lands required to accommodate the flood management works within the subject site. Reference is made to paragraph 2.25 of the Planning System and Flood Risk Management Guidelines for Planning Authorities 2009 which deal with flood protection measures and flood risk. It is argued that this paragraph states that protection structures should be ignored in determining flood zones but not zoning objectives. It is stated that utilising flood zones as a mechanism to determine zoning objectives, as has been done in draft Variation No. 2, does not acknowledge the significant body of work that has been completed in relation to flood risk management within Kilcock Environs. Furthermore, it is said that it is appropriate that flood zones should be modified within urban areas to provide for the sequential development of lands in close proximity to urban centres.

With regards to the phasing of lands, it is argued that the subject lands are sequentially the most suitable for development having regard to their proximity to the town centre. It is also contended that the Justification Test for Development Management (Box 5.1) has also been satisfied for these lands through the preparation of the flood risk assessment and management study and the site specific flood risk management proposal for them. It is requested that the phasing approach for the Environs includes the subject lands within Phase 1.

Manager's Response

Please refer to the detailed response to submission no. 1066 which has been prepared as a substantive response to the various submissions received with respect to the Kilcock Written Statement & Land Use Zoning Objectives Map.

As stated in the proposed variation, the identification of lands for release in Phase 1 in the Kilcock Environs largely arose "following the application of the sequential approach from the Town outwards (taken at the Town Square), proximity to public transport corridors and proximity to educational facilities". It is acknowledged that the subject lands are in proximity to the town centre. However, the site, which is fragmented in nature resulting from the implementation of the FRA findings, was considered less favourable in comparison to other, equally accessible sites, which could facilitate a more integrated and comprehensive form of development.

Recommendation

No change recommended.

SEA/AA Comment

No comment required.

Submission 1097	Declan Brassil & Co, Chartered Planning Consultants, on behalf
	of Alcove Ireland Two Ltd, Charter House, 5 Pembroke Row,
	Dublin 2

Summary of Main Issues Raised

The submission relates to specific lands in the Kilcock Environs. Part of the lands are included within Phase 1 of the Order of Priority set out for the Environs and it is proposed to change the zoning of part of them to open space arising from flood risk issues. The submission is accompanied by correspondence from a Consulting Engineer in respect of flood risk issues and a comprehensive legal opinion. In summary, the submission requests that:

- 1. The Zoning Boundaries be amended to be consistent with those in the current Kilcock Environs LAP 2009-2015.
- 2. A location for a school site should to be agreed in a site masterplan to be submitted in advance of any planning application for residential development.
- 3. The stated density at 35 units/ha for the Environs should be amended to 25-30 units/ha and reference to 'apartments' removed.
- 4. Additional units should be allocated to Kilcock with additional lands identified in Phase 1, or alternatively an objective should be included in the Variation to undertake a review of housing allocation under Table 2.4 in 2015 and if necessary to undertake a Variation to the County Plan to reallocate housing units on the basis of the Settlement hierarchy and the ability of settlements to deliver housing units within the period of the Development Plan. In particular, it is considered that the allocation to Navan is unrealistic and potential exists to redistribute units from it to the Kilcock Environs.

The submission contends that adequate regard has not been taken to the Flood Risk Assessment and Management Study (FRAMS) that was previously carried out for the Kilcock Environs. The detail of that study, and the fact that the works have commenced, render it appropriate to revert to the zoning boundaries as presented in the Kilcock Environs Local Area Plan 2009. In particular, it is argued that the measures proposed in the FRAMS are such that they would not give rise to residual impacts of the type referred to 'The Planning System and Flood Risk Management Guidelines for the Planning Authorities' such as would render it inappropriate to consider residential development on the lands affected.

Manager's Response

Please refer to the detailed response to submission no. 1066 which has been prepared as a substantive response to the various submissions received with respect to the Kilcock Written Statement & Land Use Zoning Objectives Map.

The development objectives for Kilcock refer to the need to reserve lands for a primary school amounting to 1.6 hectares. It is a requirement that the site for the school should be provided in Character Area 1. In this regard, objective RD OBJ 1 stated:

"To accommodate, on the lands identified on the land use zoning objectives map to the east of the R125 (Dunshaughlin road), a maximum of 250 residential units and a neighbourhood centre and to reserve of a site of 1.6 hectares for a primary school within these lands. The primary school site and neighbourhood centre shall be located adjacent to the lands identified with a G1 "Community Infrastructure" land use zoning objective situated to the east. Any application for development on these lands shall be accompanied by a Master Plan illustrating the layout for the site in its entirety as illustrated on the land use zoning objectives map. The layout shall make provision for connections, particularly pedestrian and cyclist, between the primary school and neighbourhood centre and the G1 "Community Infrastructure" zoned lands to the east."

RD OBJ 1 requires the identification of the school site on a Master Plan to be prepared for the Character Area as a whole. The Recommendation made in response to submission No. 1056 is that the lands identified with a G1 "Community Infrastructure" land use zoning objective revert back to the position shown in the zoning map of the Kilcock Environs Local Area Plan 2009. Thus, the objective above will need to be amended to take account of this site as will the accompanying text. This was included as a recommendation to Submission No. 1056.

The household allocation for the Kilcock Environs is based on Table 2.4 of the Core Strategy in the Meath County Development Plan 2013-2019. It is not proposed to revisit the distribution of units set out in the Table at this time. Objective CS OBJ 9 in the Meath County Development Plan 2013-2019 requires that the two year progress report for the Development Plan should include details of the units permitted in the county in comparison with those allocated in the Core Strategy. This will allow Meath County Council to review the progress in achieving the household targets set out for each settlement. However, the basis to redistribute from a Large Growth Town I to the environs of a Moderate Sustainable Growth Town such as Kilcock, 2 tiers below it in the regional and county settlement hierarchy is at best questionable.

The densities set out in Table 2.4 of the Core Strategy represent average densities for each settlement to generate an estimated land requirement for each urban centre. This is reiterated in Section 4 of the Written Statement for the Kilcock Environs included in the proposed Variation. It is recognised that the density proposed for individual developments contained therein is likely to vary somewhat from the figures shown. The guidance note for the A2 "New Residential" land use zoning objective in the County Development Plan states that "The appropriate density will be determined on a site by site basis having regard to the DoECLG Guidelines on Sustainable Residential Development in Urban areas and the positioning of the urban centre in the Settlement Hierarchy provided in the Core Strategy." This approach is further expanded upon in Section 11.2.1 (Residential Density) of Chapter 11, Development Management Standards and Guidelines. Section 4 of the Written Statement for the Kilcock Environs and Objectives RD OBJ 1 and RD OBJ 2 refer to the provision of a maximum of 250 no. units and 150 no. units on Character Areas 1 and 2 respectively (Emphasis added). The inclusion of maximum targets was important in light of the household allocation for the Kilcock Environs in Table 2.4 of the Core Strategy which includes inherently the headroom of 50%. Thus there is no basis for an increase in the number of units to be provided on the Phase 1 lands. In the interests of consistency, it is considered that the references to density in Section 7.1 of the Kilcock Written Statement are amended. It is not considered necessary to omit references to apartments as they could play a role in ensuring an appropriate mix of dwelling types in this area and may be particularly suitable in some areas e.g. in providing residential uses over commercial uses in the neighbourhood centre.

Recommendation

It is recommended to make the following amendments to the Kilcock Environs Written Statement:

1. Amend Section 7.1 Character Areas as follows:

"There are separate character areas denoted within the lands identified primarily for residential uses whereby a distinct layout and architectural style in each character area is required. In order to achieve this, a design statement and rationale for each area shall be approved at pre-application stage with Meath County Council. It is envisaged that the architectural expression should distinguish various building use through design. Set out below are indicative standards/provisions for each of the character areas. Proposed densities are informed by the 'Sustainable Residential Development in Urban Area Guidelines for Planning Authorities' (DoEHLG, 2009), Table 2.4 in the Core Strategy of this Development Plan and the location of each character area relative to the town centre, amenities, public transport and accessibility."

2. Amend Section 7.1.1 Character Area 1 as follows:

Density Range: Minimum of 35 no. units per hectare

3. Amend Section 7.1.2 Character Area 2 as follows:

Density Range: Minimum of 35 no. units per hectare

SEA/AA Comment

Screened out; no comment required.

Submission 1098 Declan Brassil & Co, Chartered Planning Consultants, on behalf of McGarrell Reilly Group

Summary of Main Issues Raised

The submission relates to specific lands in the Kilcock Environs and is accompanied by an assessment from a Consulting Engineer in respect of flood risk issues and a comprehensive legal opinion (same opinion as submitted with previous submission). In summary, the submission seeks a number of amendments to the proposed variation including:

- 1. That the zoning boundaries be amended to be consistent with those in the current Kilcock Environs LAP 2009-2015.
- 2. That the allocation of units in Phase 1 (2013-2019) and Phase 2 (2019-2025) of the Plan is amended to be consistent with the application for a 10 year permission for 665 no. units currently before the An Bord Pleanála under Meath County Council Register Reference DA130857.
- 3. That the stated density at 35 units/ha be amended to 25-30 units/ha and reference to 'apartments' removed.
- 4. That the draft Variation allocate additional units to Kilcock and zones additional Phase 1 lands accordingly, or alternatively include an objective in the Variation to undertake a

- review of housing allocation under Table 2.4 in 2015 and if necessary to undertake a Variation to the County Plan to reallocate housing units on the basis of the Settlement hierarchy and the ability of settlements to deliver housing units within the period of the Development Plan.
- 5. That the allocation of units in Phase 1 and 2 should be consistent with the application for a 10 year permission for 665 no. units currently before the An Bord Pleanála under Meath County Council Register Reference DA130857
- 6. That the lands for community use be re-located to their position at the eastern side of the Environs as shown in the Kilcock Environs Local Area Plan 2009 and be included in Phase 1. It is stated that legal agreement has been entered into with Blackhall Gaels GAA whereby it was agreed to provide a serviced site in this particular location and that Blackhall Gaels GAA has received public funding in 2013 for the development of new facilities on this site.

The submission contends that adequate regard has not been had to the Flood Risk Assessment and Management Study (FRAMS) that was previously carried out for the Kilcock Environs and planning history for the Environs area. The detail of the FRAMS study, and the fact that development on the works has commenced, mean that it is appropriate to revert to the zoning boundaries as presented in the Kilcock Environs Local Area Plan 2009. In addition, it is argued that the measures proposed in the FRAMS are such that they would not give rise to residual impacts of the type referred to 'The Planning System and Flood Risk Management Guidelines for the Planning Authorities' such as would render it inappropriate to consider residential development on the lands affected.

Manager's Response

Please refer to the detailed response to submission no. 1066 which has been prepared as a substantive response to the various submissions received with respect to the Kilcock Written Statement & Land Use Zoning Objectives Map. Further, it is considered that there is significant overlapping of the points raised in relation to the household allocation and density from the previous submission (no. 1097) and the Manager's Response to these issues is considered relevant in this submission also.

The household allocation for the Kilcock Environs is based on Table 2.4 of the Core Strategy in the Meath County Development Plan 2013-2019. It is not proposed to revisit the distribution of units set out in the Table at this time. Objective CS OBJ 9 in the Meath County Development Plan 2013-2019 requires that the two year progress report for the Development Plan should include details of the units permitted in the county in comparison with those allocated in the Core Strategy. This will allow Meath County Council to review the progress in achieving the household targets set out for each settlement.

The Planning Authority cannot exceed the quantum of land required to accommodate the household allocation for Kilcock as provided for in the Core Strategy of the County Development Plan. The Planning Authority cannot grant planning permission for units in excess of those allocated under the Core Strategy beyond 2019. There is no indication of the scale of units which will be allocated to Kilcock Environs or to any other centre under the 2019-2025 County Development Plan. Such a decision is considered premature.

As set out in the response to Submission No. 1056, the re-location of the land identified with a G1 "Community Infrastructure" land use zoning objective in this area arose from the desire to ensure that such lands were released in Phase 1 along with residential lands and to locate sports and recreational facilities in proximity to other community facilities and the neighbourhood centre. It is evident from the submission that plans are advanced to secure the development of

facilities for Blackhall Gaels in this locale. In light of this, it is considered that the zoning of the G1 lands in question should revert to that shown in the zoning map for the Kilcock Environs Local Area Plan 2009. The residential lands in Phase 1 east of the G1 zoned lands in the proposed variation map should be moved westwards to adjoin character area 1.

Recommendation

See recommendations made to Submission Nos. 1056 and 1097.

4.3. Kilmessan

Submission 1049 Conor Price

Summary of Main Issues Raised

This submission supports the proposed Variation No. 2 with respect to the village of Kilmessan, in particular the zoning of lands for A2 "New Residential" land use zoning objective. The lack of appropriate family dwellings within the village is highlighted and it is indicated that the household allocation for Kilmessan contained in the Core Strategy of the Development Plan will support the provision of this necessary housing.

Managers Response

The comments in the submission are noted and welcomed by the Council.

Recommendation

No change required.

SEA / AA

No comment required.

5. Kells Area Submissions Received

5.1. Athboy

Submission 1060 John Spain & Associates on behalf of HSE Dublin North East

Summary of Main Issues Raised

The submission relates to a parcel of land in the control of the Health Service Executive (HSE) – Dublin North East office in the Townparks area of Athboy adjacent to the Coille Dios residential development. The site area is just short of 0.3 hectares in extent. The subject site is currently zoned A1 – "Existing Residential" in the 2009 Athboy Local Area Plan with a new G1 "Community Infrastructure" land use zoning objective proposed for the site in the draft Variation on public display. The new "Community Infrastructure" zoning reflects an extant planning permission on the site for a Primary Health Care Facility granted in 2009. No works have started to date on the proposed Health Care Facility. Whilst the HSE acknowledge in their submission that the new proposed zoning reflects the planning permission in place for a new Primary Health Care Facility, the submission raises serious doubts regarding the viability of providing a Health Care Facility on this specific site due to its restricted size. The HSE have no imminent plans to develop such a facility on this site and are currently exploring other alternative site options in the area. The submission requests that the site revert back to an A1 "Existing Residential" land use zoning, objective giving a rationale that such a zoning allows for a greater range of uses for the HSE to provide for the future development of this site. The justification provided relates to housing on

the site having regard to the Core Strategy residential numbers allocated to Athboy (319 no. new units), the infill nature of the site, its sequential advantages being close to the town centre as well as being close to existing housing development and a future B1 "Town Centre" zoned Opportunity Site 4. In the event that the Planning Authority does not consider an A1 zoning to be suitable, the submission requests that an A2 "New Residential" or B1 "Town Centre" land use zoning objective be considered.

Manager's Response

The Manager welcomes the submission from the HSE Dublin North East office and in particular the update in relation to the HSE plans for a Primary Health Care Facility in Athboy. The Manager is fully supportive of providing a new & modern Primary Health Care Facility to serve the needs of Athboy and its wider rural hinterland population. Indeed, this is reflected in the proposed G1 'Community Infrastructure' land use zoning objective suggested for the site which has an extant planning permission in place for a Primary Health Care building in the proposed draft Variation. The Manager accepts the request submitted by the HSE that flexibility be provided on the zoning of the subject site which an A1 "Existing Residential" land use zoning objective provides. A Health Care Facility is an 'Open for Consideration' use under this land use zoning objective. The proximity of the site to existing residential development (Coille Dios Estate) provides sufficient justification that an A1 "Existing Residential" land use zoning objective remains appropriate to the context of this site. The site area being less that 0.5ha would not require the site to proceed through the residential evaluation process as any future housing scheme on this site area would be small scale in nature.

Recommendation

To amend the land use zoning objective of the site identified within this submission from a G1 "Community Infrastructure" land use zoning objective to an A1 "Existing Residential" land use zoning objective.

SEA/AA Comment

Screened out; no comment required.

Submission 1082	Mark Brindley of The Planning Partnership with a joint
	submission on behalf of Clann Na nGael GAA Club and Homex
	Ltd

Summary of Main Issues Raised

The joint submission on behalf of Clann Na nGael GAA club and Homex Ltd relates to lands in the northeast of Athboy comprising of the existing GAA grounds and greenfield lands to the northeast of same. The submission highlights that there is a legal agreement in place between the two parties to participate in a joint venture to deliver a relocated, expanded and enhanced GAA Club facility. The legal agreement requires that planning permission for residential development be granted on Homex Ltd. lands (landholding map submitted identifying same) prior to the permanent relocation of the GAA club and its facilities to the new site.

The draft Variation on public display has zoned the existing GAA grounds as A2 "New Residential" and as 'Opportunity Site 3' whilst linking the development of same to the provision of playing pitch facilities on G1 "Community Infrastructure" zoned lands to the northeast in advance of the release of the current GAA ground for their redevelopment.

The submission welcomes the land use zoning and planning policy objectives to facilitate the relocation of the Clann na NGael Club from its current constrained location at O'Growney Park to the proposed new location. However it is stated that the current legal agreement between the GAA club and Homex Ltd. is dependant on planning permission being granted on Homex Ltd.

lands for residential development otherwise the permanent relocation of the club cannot take place. In this regard the submission is seeking two options to be explored further by the Planning Authority:

Option 1: Advance Residential Phase 1 lands on Homex lands

This is the preferred option presented in the submission whereby an additional 10 acres (4 hectares) of A2 "New Residential" zoned lands be provided in the Phase 1 Order of Priority on the southern part of the Homex Ltd. landholding enabling the appropriate roads, pedestrian/cycle infrastructure be put in place which also allows access the proposed new GAA facility.

Option 2: Explicit Agreement to consider a 10 year Permission for an Integrated Scheme

If Option 1 is considered unacceptable to the Planning Authority, an alterative arrangement could be to allow a 10 year planning permission on the Phase 2 lands to allow for an integrated scheme on the entire landholding with the residential Phase 2 conditioned not to commence until 2019.

A Framework Plan for the subject lands has been submitted to the Planning Authority which was not given approval at the time in advance of the Core Strategy being published.

The submission also notes that there is a flexibility noted in relation to Phase II employment lands as per policy SP 3 which states:

iii) Should a significant development be proposed which could not be accommodated only within the lands identified as Phase I, lands within Phase II may be considered in this regard. The development of the lands identified as Phase II will be subject to the preparation and agreement of a Framework Plan with the Planning Authority prior to the submission of any planning application on said lands.

A similar flexible policy to SP3 (iii) could be applied in this regard to SP2 relating to Phase II residential lands and where the commencement of development could be conditioned on a phased timescale accordingly and as such to allow the 'legal agreement' between Homex Ltd. and Clann na nGael to enable the transfer of land to the GAA Club which is only triggered by permission on Homex Ltd. lands.

Access Points

In addition, the submission requests the Planning Authority to reconsider the proposed access point to serve the proposed residential zonings. It is suggested to remove the current proposed access point from the Navan Road (N51) which is not feasible due to its unavailability as the land is not in the ownership of either party. A proposed new access point is suggested off the local county road as a preferable alternative to opening an additional access point onto the N51 national secondary road.

A second proposed access point on the local county road into Homex Ltd. lands is also suggested to benefit the required infrastructure to access the GAA Club and notwithstanding the agreement or otherwise in response to this submission in respect of the additional Residential Phase 1 zoning, it is suggest that the proposed access is retained at this location.

Manager's Response

The Manager notes the detailed submission made by Clann na NGael and Homex Ltd in relation to the proposed residential and community zoned lands off the Navan Road in Athboy. At the outset, it should be recognised that the residential zoned lands which have been identified for release in Phase 1 of the Order of Priority (up to 2019) in the draft Variation were selected largely following the application of the sequential approach from the Main Street outwards. It was considered that the other sites which were previously identified for residential development

in the 2009 Local Area Plan were considered less favourable on the basis of their identified flood risk, peripheral location relative to the town centre or lands being land locked with no obvious or deliverable access available. The lands the subject of this submission was considered the most peripheral of all sites examined from the town centre.

A particular mention is provided in Section 04 of the Athboy Written Statement that the only departure to this sequential assessment of residential zoned lands was to retain the Phase 1 residential zoning of the existing GAA grounds in order to facilitate the community gain that the proposed relocation would have for improved sports facilities for the local population. CF POL 4 and CF OBJ contained in the Athboy Written Statement consolidate same.

Whilst the Manager acknowledges that the submission highlights that there is a legal agreement in place between Clann Na nGael and Homex Ltd linking the relocation of the GAA club grounds to the delivery of residential units on Homex Ltd. owned lands, the submission also acknowledges that this is a private legal agreement between those two parties which the Council is not bound by. There is no planning rationale which can be justified for the release of additional residential zoned lands in Athbov, particularly at such a peripheral location to the town centre over other sites which ranked higher in the residential evaluation. Sufficient zoned lands have been identified in the draft Variation to accommodate the 319 no. units allocated to Athboy in the Core Strategy of the Meath County Development Plan 2013 - 2019. Any further increase in Phase 1 Order of Priority lands would contravene the Core Strategy of the County Development Plan and the evidence based methodology used. The submission fails to present an acceptable compromise to the Planning Authority. The Planning Authority cannot exceed the quantum of land required to accommodate the household allocation for Athboy as provided for in the Core Strategy of the County Development Plan. It is not considered that it is appropriate to exclude a more centrally located site in the town in favour of these peripherally located lands. Furthermore, the Planning Authority cannot grant planning permission for units in excess of those allocated under the Core Strategy beyond 2019. There is no indication of the scale of units which will be allocated to Athboy under the 2019-2025 County Development Plan. Such a decision is considered premature.

Access Issue

The Manager does not consider the alternative access arrangements onto the local road as requested to be acceptable. It is considered that the road conditions & overall geometry are presently substandard at this location with limited widths for two cars to pass in addition to limited sightline visibility from the junction of the Gillstown Road with the N51 which would not be satisfactory to serve a new residential housing scheme. It is not considered appropriate to identify indicative access points to serve such Phase 2 lands as part of this CDP variation. It remains the view of the Manager that the most suitable indicative location to serve as a safe access point to the subject Phase 1 residential zoned lands is a new entrance onto the N51 road as shown in the zoning objectives map for Athboy. This would be located inside the standard 50 km/h speed limit for the town and have the benefit of existing footpath and public lighting facilities in place along the main road. The indicative access is as described, it does not compel a designer to adhere to same if an acceptable alternative safe access can be achieved. Please also refer to the recommendation to submission no. 1043 by the National Roads Authority which also impacts on the proposed accessing of said lands.

Recommendation

No change required.

SEA/AA Comment

No comment required.

6. Slane Area Submissions Received

6.1. Donore

Submission 1051 Michael Lawlor

Summary of Main Issues Raised

The submission relates to lands in Donore village to the north and south of the Staleen Road that are indicated to be in the ownership of Michael Lawlor. The submission highlights that these lands were prioritised for development in the previous Development Plan (Order of Priority) and planning permission has been grated for 4 no. houses on the subject lands. It is highlighted that the emphasis for development proposals in the Donore area has been based on the visual impact of new development from the Knowth, Dowth and Newgrange sites. The submission contends that the site prioritised for Phase 1 development in the draft Variation is located at the highest and most visible point in the village and would have difficulty getting approval through the planning consent process. The submission includes a photograph showing the subject site at a distance from the Dowth monument. The submission contends that that lands in his ownership on the north side of the Staleen Road and the lower part of the lands on the south side of the Staleen Road are the lands with the least visual impact from the monuments as they are completely unseen from Newgrange, Knowth and Dowth. The lands proposed for development in the 2013-2019 period are in receivership and allegedly in a legal wrangle with an out of state owner. This means that there are highly unlikely to be developed during the new development plan period. In the current proposed variation, the submission states that there will be shortage of available housing units within Donore. The submission requests that the standard 50% headroom of residential zoned land be applied to the village so that there is more than one option available for development. It is proposed that the current draft Variation be amended and that the allocation of 20 no. residential units as proposed be split with another site to include the lands to the north of the Staleen Road and the lower portion of the lands to the south of the Staleen Road in the Order of Priority 2013 – 2019.

Manager's Response

The Manager notes the comments & concerns raised in this submission. In the first instance, it should be acknowledged that Donore is categorised as a village in the settlement hierarchy of the Meath County Development Plan 2013 – 2019 and that the pace of recent residential development in the village has significantly outpaced the level of commensurate community & social infrastructure available. The CSO Census of Population statistics indicate that Donore has grown from 334 no. persons in 2002 to 692 no. persons in 2011 (107% increase in 9 years). The pace of residential growth experienced in a small village settlement is not sustainable. Furthermore, the County Development Plan has identified that there is a significant oversupply of residential zoned land in the village which now needs to be addressed. An allocation of 20 no. new residential units is considered sufficient to serve the new housing needs of the village for the period 2013 – 2019 as provided for in the Core Strategy, Table 2.4 refers.

To address this, an Order of Priority was introduced for Donore in the draft Variation which selects the most preferential site in Donore to accommodate the 20 no. units allocated. The method used was based on a sequential approach from the village centre (identified as the village crossroads) which is consistent with the method used across all village settlements in the county. In addition, due to the sensitive landscape nature of Donore, being located within the buffer zone of the Brú na Bóinne UNESCSO World Heritage Site, topography was also taken into

account. The land that was identified within the Phase 1 Order of Priority for release in the current Development Plan period (2013-2019) is located on the Duleek Road in close proximity to the village centre, the national school and an established housing development (St. Mary's Villa's). The front portion of the field is generally flat whilst rising towards the rear boundaries. It is the front portion of the field which is identified as Phase 1 development in the Order of Priority and is located adjacent to an area identified with a B1 "Village Centre" land use zoning objective.

It is not considered that the alternate lands suggested in the submission on the Staleen Road are more favourable from a visual sensitivity viewpoint as they are closer to the Dowth monument and are mostly elevated in nature. In addition, such lands score poorly on a sequential approach assessment being the furthest residentially zoned lands from the village centre. The housing allocation outlined for each settlement in the county within the Core Strategy of the Meath County Development 2013-2019 (Chapter 2) indicates that the 50% headroom is already included in the allocation figures (Table 2.5 refers).

In addition, the Manager would point out that there are safeguards built into the policy framework in the draft Donore Written Statement with WHS POL 1 requiring that all development proposals involving mixed-use, commercial or multiple unit residential development within the village boundary being subject to a Visual Impact Assessment on the village character or the Core Area of the Brú na Bóinne UNESCSO World Heritage Site.

The Manager considers it inappropriate to comment on the landowner of the identified Phase I lands other than noting submission no. 1062 received on their behalf.

Recommendation

No change recommended.

SEA/AA Comment

No comment required.

Submission 1053 Michael & John Lawlor

Summary of Main Issues Raised

The submission relates to a storage yard owned by Michael & John Lawlor at Carranstown, Duleek. The submission requests the lands be rezoned to a commercial/light industrial use as it is proposed that they be used for the indoor storage of certain limestone and quarry products from nearby quarries in the area (Platin cement works, Lagan quarries Roadstone, CEMEX and Kilsaran). It is indicated that the Development Plan policy supports the location of industrial/business enterprises in rural locations where the proposed use has locational requirements that can only be accommodated in a particular area. It is stated that there are no suitable premises within the Duleek area for the storage of this type of product. The Duleek Business Park contains a lot of high quality "clean" products manufactured.

Manager's Response

The Manager notes the comments raised in the submission. It is however noted that the subject land is currently unzoned positioned approximately halfway between Duleek and Donore close to a quarry operated by 'Keegan Quarries Ltd'. The Manager does not agree that the subject lands require to be zoned for a commercial or light industrial use in this instance. Any proposals put forward by the landowner/or other applicant for a commercial storage yard use at the site can be made through the normal planning application process under the Economic Development/Development Management provisions for rural development set out in the Meath County Development Plan 2013 – 2019. The zoning of such a site is not considered appropriate in this instance and would set an undesirable precedent in the county for similar such proposals.

The Development Management process will assess the merits of such a proposal in terms of location, use, traffic and environment considerations in addition to allowing for third parties & prescribed bodies to comment on any such proposals.

Recommendation

No change recommended.

SEA/AA Comment

No comment required.

Submission 1062 Stephanie Hughes of Clyde Shanks Planning Consultancy on behalf of Soll Developments (ROI) Ltd/ FCR

Summary of Main Issues Raised

The submission relates to lands in Donore village positioned to the east of the Duleek Road which are currently zoned a mixture of A1 "Existing Residential", A2 "New Residential" and B1 "Village Centre" land use zoning objectives in the draft Variation. Whilst only a portion of the lands identified are identified for release in Phase 1 of the Order of Priority, the submission accepts that compliance is required with the Core Strategy of the Meath County Development Plan 2013 – 2019 in terms of housing allocation for the village. The submission supports the phasing strategy set out for Donore in the draft Variation and is keen for these to be adopted in the final version of Variation 2 to enable the lands to be developed accordingly during the plan period.

Manager's Response

The Manager notes the comments raised in the submission and the broad support indicated for the Order of Priority phasing strategy set out for Donore in the draft Variation.

Recommendation

No change recommended.

SEA/AA Comment

No comment required.

6.2. Duleek

Submission 1001 Sally Griffin on behalf of Duleek Revival Committee

Summary of Main Issues Raised

The submissions seeks to include a provision for a cycle lane from the Main Street in Duleek (junction at Eurospar) to the National Schools with the overall aim of encouraging more children to cycle to school, improve road safety and reduce traffic congestion associated with the national schools in the town.

Manager's Response

The Manager welcomes the submission in relation to the highlighted need for a cycle lane objective to be provided in Duleek connecting the town centre with the national schools which are located at a distance from same. The Manager is fully supportive of improving sustainable transport measures throughout the county and has no objection to including an objective to provide a cycle lane within the Duleek Written Statement as an alteration to the draft Variation.

Recommendation

To include a new objective in the Duleek Written Statement as follows:

MA OBJ 4 To investigate the provision of a new pedestrian and cycle link between the town centre and the national schools located on Abbey Road.

SEA/AA Comment

The proposed pedestrian connectivity would be a positive for Human Beings and Transportation. The protective policies and objectives of the development plan will protect natural heritage.

6.3. Gormonston

Submission 1047 Department of Defence

Summary of Main Issues Raised

The Defence Forces have no observations and support the present County Council Local Area Plan proposal that the Camp is rezoned.

Manager's Response

The Council notes the contents of the Defence Forces submission and welcomes the support for the identification of the subject lands with a "White Lands" land use zoning objective in the proposed draft Variation.

Recommendation

No change required.

SEA/AA Comment

No comment required.

6.4. Julianstown

Submission 1093 Christopher Martin

Summary of Main Issues Raised

The submission received relates to 0.77 hectares (1.9 acres) of land approximately 1.5 kilometres south east of Julianstown village. The site is adjacent to the landowner's family home. It is stated that the site is fully serviced and has 25 metres of road frontage. The landowner argues that Whitecross is a 'Graig' with the potential to relieve rural development pressure. It is proposed that the site in question is re-zoned to facilitate a dwelling for the landowner's family.

The rezoning of the site has been justified on the basis of its location adjoining the R132 Regional Road, the ageing population of Whitecross and that younger citizens have steadily migrated to urban centres. It is stated that this has created concern and a number of the submitter's neighbours have voiced their support for the future rural housing development of lands for the applicant's family.

It is further stated that the proposed re-zoning would facilitate a residential dwelling house application for the applicant fulfilling Local Needs criteria on an infill site, reducing the age demographic in Whitecross Julianstown and utilise a dormant site in a currently unzoned but established Graig at Whitecross.

Manager's Response

The site in question is located approximately 700m south west of Julianstown development boundary. It is not the practice of the Council to consider agricultural land for zoning so far removed from the development boundary of a settlement. Furthermore it is important to note that the primary purpose of the proposed variation is to give effect to the Core Strategy of the County Development Plan by introducing demand management techniques which phase existing residentially zoned lands within all settlements of the County given the significant excess of such land in accordance with Table 2.4 of the County Development Plan. It is considered inappropriate to accede to the request submitted. The consideration of an individual dwelling on the subject site will be assessed against the rural housing policies contained in the County Development Plan 2013-2019. Furthermore, the current County Development Plan dispensed with the "Graig" concept which was contained in previous iterations.

Recommendation

No change required.

SEA/AA Comment

No comment required.

6.5. Stamullen

Submission 1057 Emily Gough

Summary of Main Issues Raised

This submission requests to amend the zoning for plot from agricultural land to allow for one sensitively designed dwelling.

Manager's Response

The site in question is located approximately 3 km south west of Stamullen village. It is not the practice of the Council to consider agricultural land for land use zoning so far removed from the development boundary of a settlement. Furthermore it is important to note that the primary purpose of the proposed variation is to give effect to the Core Strategy of the County Development Plan by introducing demand management techniques which phase existing residentially zoned lands within all settlements of the County given the significant excess of such land in accordance with Table 2.4 of the County Development Plan. It is considered inappropriate to accede to the request submitted. The consideration of an individual dwelling on the subject site will be assessed against the rural housing policies contained in the County Development Plan 2013-2019.

Recommendation

No change required

SEA/AA Comment

No comment required.

Submission 1091 McGarrell Reilly Group

Summary of Main Issues Raised

The submission on behalf of the developer of City North Business Campus in Stamullen states that City North is a very successful business hub and currently accommodates the 128 no. bedroom City North Hotel & Conference facility and 14,000 sq. m. of commercial buildings accommodating high quality employments uses.

The authors contend that they have made significant investment in the form of site infrastructure, construction of the hotel and landscaping to support the objective of the land as a vibrant business hub within the East Meath Local Area Plan 2005 and the approved Framework Plan prepared under STA8 of said plan. Both plans identified and supported City North's role as a driver of economic development in the East Meath area.

It is stated that a comparative analysis with Fingal and Louth undertaken by Indecon Consultants and referenced in the Meath County Development Plan 2013-2019 indicates that East Meath is significantly under performing and has not benefited from its position within the M1 corridor to the same extent as its neighbouring Counties. This report has recommended that Stamullen has the potential to create an employment hub serving the wider East Meath area. The County Development Plan acknowledged the role of Stamullen but deferred this potential by stating that,

'Any change in the status of Stamullen to accommodate an expanded economic role in the regional hierarchy will be advanced through future reviews of the RPG's.

This position is restated in the Stamullen Written Statement of the draft Variation.

The acknowledgement to the economic potential of City North and the commitment to advance this status in the review of the RPG's is welcomed in the County Plan and in the proposed draft Variation No. 2. The draft Variation provides an opportunity to clearly establish a more progressive planning policy framework to support further investment in a significant employment generating hub at City North and to provide a statutory plan-led basis for the Council to proactively promote and advance that status at regional level.

Having regard to the nature and extent of development undertaken to date at City North Business Campus the following amendments are sought:

- 1) Inclusion of Strategic Policy SP 6 as follows:
- SP6: To actively pursue in the review of the Regional Planning Guidelines for the Greater Dublin Area an expanded economic role of Stamullen which acknowledges its potential as a major employment and economic hub in the East Meath area which is not tied to or limited by its status in the Regional Settlement Hierarchy.
- 2) The removal of the E3 land use zoning objective and replacement with the E2 land use zoning objective for the totality of the landholding. It is considered that the E3 land use zoning objective is not consistent with the established uses on site or the high level of investment in hotel facilities and landscaping and site infrastructure planned and undertaken to date.

3) It is proposed that the land use objective LU OBJ 2 is amended as follows:

To require that preparation of a Framework Plan for the lands identified as a combination of E2 "General Industry & Employment" and E3 "Warehousing & Distribution" Phase I and Phase II on the accompanying land use zoning objectives map The Framework Plan shall be agreed with the Planning Authority in writing prior to the submission of any new planning application which seeks to develop lands for development which have not been the subject of a previous grant of planning permission. Applications for extension of duration or revisions to previously approved developments shall be considered on their merits and shall not require the agreement of a Framework Plan in advance. The Framework Plan shall have regard to and be consistent with the range of uses indicated in the County Development Plan as being appropriate to E2 "General Industry & Employment" Category 3 (Small Towns and Villages) and E3 "Warehousing & Distribution" as provided for in Volume I of the County Development Plan. The Framework Plan shall realise TP OBJ 5 which seeks to facilitate vehicular access to/from the village via City North Business Campus to the M1 Motorway Interchange. The Framework Plan shall be informed by a revised Traffic Impact Assessment which shall assess the capacity of the existing configuration of Junction 7 to cater for the projected traffic volumes with any upgrade of the capacity of the junction to facilitate the development of the adjoining employment lands to be provided for by the developers of said lands, or as may otherwise be agreed with the Council and/or NRA.

4) That Strategic Policy SP3 be amended to be consistent with LU OBJ 2 above, as follows:

To advance the possible upgrading of M1 Junction 7 to improve its capacity inclusive of the facilitation of vehicular access to / from Stamullen via the City North Business Campus to the M1 Interchange in co-operation with the National Roads Authority. Any upgrade of the capacity of the junction to facilitate the development of the adjoining employment lands shall be provided for by the developers of said lands at the developer's expense or as may otherwise be agreed with the Council and/or NRA.

5) LU OBJ 1 and 5 acknowledge the importance of connectivity and permeability and provide for new connections between Stamullen and City North Campus. To maximise the opportunity to deliver these connections, it is proposed that LU OBJ 1 be amended as follows

'the delivery of vehicular access from the Gormanston Road to the City North Business Campus to the north through the 3.02 Ha tract of residentially zoned land to the east of Stamullen village, or as otherwise may become available and deliverable through other lands'.

The incorporation of the East Meath LAP for the Stamullen area into the County Plan presents an opportunity to create a policy platform to support the creation of a dynamic economic hub based on a 4th Generation Business Park concept at City North, fully and properly integrated with the established urban area.

Manager's Response

1. The Manager acknowledges the points raised within the submission regarding the success to date of City North Business Campus and the significant role which this will play in providing significant local economic opportunities for the Small Town of Stamullen and in developing an employment hub along the M1 Corridor. However notwithstanding the possible evolution of the economic role of Stamullen in the future, it is at present a Small Town in the County Settlement Hierarchy. The Regional Planning Guidelines (RPGs) do not specifically designate Stamullen in either the Settlement or the Economic Hierarchies. The RPGs

states that economic investment opportunities should be considered and supported where sustainable and in keeping with the size and services of the town.

The "Mid East Regional Authority Economic Development Strategy" (December 2009) which is appended to the RPGs, recognises the imbalance in the Mid-East Region between existing residential development and the limited level of economic development being provided. The Strategy advocates the designation of Stamullen as a Secondary Economic Hub, predicated upon the development of the deepwater port and would further support the clustering of a wide range of economic activities leveraging on the existing economic base. However, it is clear that the future promotion of Stamullen in the regional economic hierarchy is intrinsically linked to the development of a deepwater port in the general Gormonston area. This point has been made quite strongly in the submissions received from both the NRA and the NTA.

Any change to the designation of Stamullen can only be considered through a future review of the RPGs settlement and economic strategies as indicated in Section 4.1.5 of the County Development Plan. It is considered inappropriate to advance this as an objective within the Stamullen Written Statement. It is equally considered improper and somewhat illogical to disregard the role and function of the adjoining settlement of Stamullen in determining the economic role and function of the lands adjoining City North Business Campus. It is therefore not considered necessary to include the proposed Strategic Policy SP 6 as suggested within the draft Variation.

The Stamullen Written Statement provides for the employment zoning of 16.1 hectares in Phase I, developed in accordance with an approved Framework Plan as required pursuant to LU OBJ 2. The Manager has defended, in her response to the submissions from the NTA and the NRA that the quantum of lands identified for release during the life of this Development Plan is appropriate for a Small Town such as Stamullen and having regard to the lack of certainty regarding the proposed development of a deepwater port in Gormonston.

- 2. The proposed mix of E2 "General Enterprise & Employment" & E3 "Warehousing & Distribution" land use zoning objectives within the remainder of the site was intended to provide the land owner with greater flexibility to attract business to this location. There is no specified quantum assigned to either land use zoning objective, thus leaving the future development of the site to the discretion of the landowner within the parameters of the uses open for consideration under these land use zoning objectives. The proposed flexibility was not intended to hamper the land owner in anyway and the Manager is somewhat bemused by the request to impose less flexibility within the development site. Furthermore, the Manager would direct McGarrell Reilly to ED OBJ 4 in the County Development Plan which seeks "To ensure that sufficient and suitable land is zoned for logistics, distribution and supply chain management industries at Ashbourne, Dunboyne / Clonee and Stamullen and in addition to land zoned for large scale and general industry." (Emphasis added) It was determined that the excellent road access available at City North Business Campus via the M1 Junction 7 renders the site as suitable for logistics, distribution and supply chain management. No other site is identified for employment use elsewhere in Stamullen which could satisfy this objective.
- 3. The proposal to alter the proposed land use objective LU OBJ 2, by removing the E3 land use zoning objective would restrict development on this site and is not considered appropriate as outlined in the preceding section of this report. The inclusion of the suggested amendment to the wording of LU OBJ 2 is not therefore considered acceptable. The developer and beneficiary of any development on the lands in question should bear the costs of any improvements required to junction 7 to cater for projected traffic volumes generated as a direct result of development proposed. It is unclear what the alternative

would be which would be acceptable to the NRA and Meath County Council. However, it is considered that the inclusion of the suggested flexibility does not negate the thrust of this sentiment. The latter amendment is considered acceptable.

- 4. It is logical that the suggested amendment accepted above should also be reflected in the wording of SP3.
- 5. The proposed changes to LU OBJ 1 and 5 to include the flexibility of delivering the required vehicular access through alternative lands that may become available do not necessarily cause undue concern for Meath County Council notwithstanding that an indicative route has been identified in the land use zoning objectives. The position of the proposed route has been integral to the inclusion of the subject lands within the Phase I residential lands. However, it is accepted that the provision of flexibility in the manner in which this link could be delivered may still result in the indicative option being pursued. No change to the lands identified for Phase I residential should be required arising from the suggested amendment.

LU OBJ 1 and 5 acknowledge the importance of connectivity and permeability and provide for new connections between Stamullen and City North Campus. To maximise the opportunity to deliver these connections, it is proposed that LU OBJ 1 be amended as follows

'the delivery of vehicular access from the Gormanston Road to the City North Business Campus to the north through the 3.02 Ha tract of residentially zoned land to the east of Stamullen village, or as otherwise may become available and deliverable through other lands'.

Recommendation

1. To amend the wording of Land Use Objective LU OBJ 2 in the Stamullen Written Statement as follows:

LU OBJ 2

To require that preparation of a Framework Plan for the lands identified as a combination of E2 "General Industry & Employment" and E3 "Warehousing & Distribution"-Phase I and Phase II on the accompanying land use zoning objectives map The Framework Plan shall be agreed with the Planning Authority in writing prior to the submission of any new planning application which seeks to develop lands for development which have not been the subject of a previous grant of planning permission. Applications for extension of duration or revisions to previously approved developments shall be considered on their merits and shall not require the agreement of a Framework Plan in advance. The Framework Plan shall have regard to and be consistent with the range of uses indicated in the County Development Plan as being appropriate to E2 "General Industry & Employment" Category 3 (Small Towns and Villages) and E3 "Warehousing & Distribution" as provided for in Volume I of the County Development Plan. The Framework Plan shall realise TP OBJ 5 which seeks to facilitate vehicular access to/from the village via City North Business Campus to the M1 Motorway Interchange. The Framework Plan shall be informed by a revised Traffic Impact Assessment which shall assess the capacity of the existing configuration of Junction 7 to cater for the projected traffic volumes with any upgrade of the capacity of the junction to facilitate the development of the adjoining employment lands to be provided for by the developers of said lands, or as may otherwise be agreed with the Council and/or NRA.

2. To amend the wording of Strategic Policy SP3 in the Stamullen Written Statement as follows:

To advance the possible upgrading of M1 Junction 7 to improve its capacity inclusive of the facilitation of vehicular access to / from Stamullen via the City North Business Campus to the M1 Interchange in co-operation with the National Roads Authority. Any upgrade of the capacity of the junction to facilitate the development of the adjoining employment lands shall be provided for by the developers of said lands at the developer's expense or as may otherwise be agreed with the Council and/or NRA.

3. To amend Land Use objective LU OBJ 1 in the Stamullen Written Statement as follows:

LU OBJ 1 To develop lands identified as Phase I "New Residential" in accordance with the adopted Framework Plan (October 2007). The areas to which the Framework Plan applies to this Development Framework have been identified on the land use zoning objectives maps. The development of residential land in Phase I shall ensure the delivery of (a) the provision of safe pedestrian and cyclist access linking the newly developed sports lands with the village and residential core of Stamullen, (b) the delivery of vehicular access from the Gormanston Road to the City North Business Campus to the north through the 3.02 Ha tract of residentially zoned land to the east of Stamullen village or as otherwise may become available and deliverable through other lands, (c) the provision of landscaped open space incorporating a 1 acre community facility on lands identified as F1 "Open Space" adjoining the M1 Motorway ensuring that the wayleave for the gas transmission line is protected (d) the delivery of a useable riverside walk along the River Delvin. The development of the residential lands in Phase I will require the resolution of the sanitary services constraints in the area, in particular wastewater constraints. Residential development shall only be permitted subject to the delivery of the necessary social and physical infrastructure. Any revision to the existing adopted Framework Plan for these lands shall be agreed with the Planning Authority in writing and in advance of lodging any planning application pertaining to these

SEA/AA Comment

Screened out; no comment required.

7. Trim Area Submissions Received

7.1. Ballivor

Submission 1083 The Planning Partnership on behalf of Vetimill Limited

Summary of Main Issues Raised

It is contended that a site to the northeast of Ballivor is retained as being available for residential development. It is argued that the subject land provides a well-located and logically preferable site for residential development of the village when the current available centrally located lands are exhausted. The submission seeks to confirm the suitability and availability of the subject lands for residential development when required in the next plan period, if not before, and which will positively contribute to the consolidation of the village and the strengthening opportunities which the site provides.

Managers Response

The subject site is located at the edge of the development boundary for Ballivor. Having carried out an evidence based approach to assessing which residential land is to be released over the life time of the Plan, there were other residential zoned lands which were located closer to the Main Street. The extent of residential lands to be released over the lifetime of the current County Development Plan 2013-2019 can accommodate the 60 no. units allocated to Ballivor in the Core Strategy. Therefore, there is no requirement to release any further lands at this stage and to do so would not be consistent with the Core Strategy of the County Development Plan 2013-2019.

Recommendation

No change required.

SEA / AA Comment

No comment required.

7.2. Clonard

Submission 1061	Waterman	Moylan	Engineering	Consultants	on	behalf	of
	Crocusglen	Limited					

Summary of Main Issues Raised

This submission is in relation to the Flood Risk Assessment and Management Plan which informed the proposed Variation No. 2 to the Meath County Development Plan 2013-2019 in so far as it relates to lands adjacent to the Kilwarden River in Clonard.

There are 7 no. existing completed but unsold houses within the area shown to be within the 1 in 1000 year flood plain despite being constructed approximately 500mm above the surrounding ground levels. The FRA presented in the draft Variation would have a very detrimental effect upon the ability of the landowner to sell these houses. It is indicated that the lands in question were outside the flood plain in the SFRA prepared for the County Meath Development Plan and it is contended that the FRA and Management Plan for the proposed Variation No. 2 has now incorrectly shown these lands to be within the flood plain.

Managers Response

The JFlow mapping presented in Section 5.6 of the Strategic Flood Risk Assessment & Management Plan (SFRA) prepared to inform Variation No. 2 represents both improved Digital Terrain Modelling and hydrology compared to that contained within the Meath County Development Plan 2013-2019. Flood Zone mapping is indicative in nature; however, considering that the permitted finished floor levels of the dwellings is 66.50mOD, it is clear that significant lowering of levels has occurred at this site and are below the 1 in 100 year flood level. Given the low lying nature of the local floodplain and the levels at which the houses have been constructed, it is reasonable to conclude that there is a risk of flooding to the properties. The Flood Zone information is appropriately detailed for the purposes of the SFRA. An arterial drainage scheme on the river could reduce levels subject to a more detailed study.

Recommendation

No comment required.

SEA / AA

No comment required.

7.3. Enfield

A significant number of submissions have been received in relation to the provision of a second level education facility in Enfield.

Submission 1002 Submission 1006 Submission 1007 Submission 1008 Submission 1009 Submission 1009 Submission 1010 Submission 1010 Submission 1011 Submission 1012 Submission 1014 Submission 1015 Submission 1016 Submission 1017 Submission 1017 Submission 1018 Submission 1019 Submission 1019 Submission 1020 Submission 1020 Submission 1021 Submission 1022 Submission 1023 Submission 1024 Submission 1025 Submission 1026 Submission 1027 Submission 1028 Submission 1029 Submission 1029 Submission 1029 Submission 1020 Submission 1021 Submission 1025 Submission 1026 Submission 1027 Submission 1028 Submission 1030 Submission 1031 Submission 1031 Submission 1032 Submission 1033 Submission 1034 Submission 1035 Submission 1036 Submission 1037 Submission 1038 Submission 1039 Submission 1039 Submission 1039 Submission 1030 Submission 1031 Submission 1034 Submission 1035 Submission 1036 Submission 1037 Submission 1038 Submission 1039 Submission 1040 Submission 1041 Submission 1042 Submission 1044 Submission 1045 Submission 1050 Sarah Cooling		
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Submission 1045 Jill O'Meara		Sharon Healy
	Submission 1042	Andrew Fox
Submission 1050 Sarah Cooling	Submission 1045	Jill O'Meara
	Submission 1050	Sarah Cooling

Summary of Main Issues Raised

The submissions generally request for the specific inclusion of an objective for a post primary school for Enfield in one of the areas zoned for community, social or educational facilities. It is further emphasised in some of the submissions that the Council needs to be proactive in representing the community to the relevant educational authorities as part of the overall necessary infrastructure required for the population under its care i.e. by securing rather than simply zoning a site. In order to make best return on a substantial investment in rail and road infrastructure in Enfield, and to ensure the ongoing success of town services, it is necessary to provide Enfield with infrastructure that would be expected within a town of its size, to give it sufficient gravitas to succeed independently.

Managers Response

Meath County Council recognise the importance of education and making provision for education in statutory land use plans and liaises with the relevant authorities to ensure the timely and adequate delivery of school places. There is a comprehensive social strategy set out in the Meath County Development Plan 2013 - 2019 and the policies of the plan aim to facilitate the development of primary, post primary, third level, outreach, special needs, research, adult and further educational facilities to meet the needs of the county.

However, the primary role of the Council in this regard is to reserve sufficient lands within each settlement centre to meet likely future demands for community infrastructure which includes, most critically, education. This has been carried out in relation to schools in Enfield in consultation with the Department of Education and Skills during the preparation of the proposed draft Variation (No. 2) of the Meath County Development Plan 2013-2019. As detailed in Section 6 of the proposed draft Enfield Written Statement, a site of 5.85 hectares has been identified for community uses to the east of Enfield and it is considered adequate to accommodate both a primary and post-primary school. Further to ensuring that sufficient lands have been zoned to accommodate the projected educational requirements within Enfield, the policy framework to facilitate a post-primary school has been put in place through the inclusion of CF POL 2 in the Enfield Written Statement. CF POL 2 states, 'To facilitate the provision of a post-primary school to the east of Enfield on the site identified for G1 'Community Infrastructure' land use zoning objective'.

It is acknowledged that a recurring problem relating to the provision of community infrastructure, in particular education and health facilities which are mainly provided by public bodies, is that the reservation of such sites by appropriate zoning is not in itself a guarantee of the timely provision of a necessary community facility such as a post-primary school. However, whilst the Council will endeavour to work with the Department of Education and Skills in the provision of schools in County Meath through site identification and acquisition if required, it is the Department of Education and Skills that identify which projects are prioritised. This is not a function of the Council. A 5 year plan has been published by the Department of Education and Skills in 2012 which identifies all new projects to commence over the next 5 years. It is noted that whilst the provision of a post-primary school in Enfield is not set down for the period 2012-2016, the Department of Education and Skills are analysing primary school data along with child benefit data to examine the need for additional post-primary schools throughout the country post 2016.

The Council will continue to impress the need upon the Department of Education & Skills of the need to provide a second level educational facility in Enfield to cater for the growing population of the town and the adjoining village of Johnstown Bridge in Co. Kildare.

Recommendation

No change required.

SEA / AA

No comment required.

Submission 1044 Sarah Scanlon on behalf of Enfield Macra

Summary of Main Issues Raised

The submission requests the renovation of the community hall in Enfield. The substandard nature of the facilities and the consequent need to use facilities in the surrounding villages such as Summerhill and Clonard are highlighted.

Managers Response

The Council would generally be supportive of a planning application to renovate the existing community hall in Enfield subject to the proposal adhering to the proper planning and sustainable development of the area. Community grants were available for such works until 2008. However, it is noted that whilst a grant was approved to the Enfield Hall Committee in August 2008 for the renovation of the Enfield community hall, no funds have been utilised to date.

Community groups interested in the renovation of such a facility should seek out funding sources and liaise with the Council in terms of applying for planning permission where required and considered appropriate. There are other funding sources such as LEADER funding, which could be explored in the future. It is not considered that such matters are relevant to the preparation of this proposed Variation.

Recommendation

No change required.

SEA / AA

No comment required.

Submission 1046 Triona McFall

Summary of Main Issues Raised

Request for the specific inclusion of a post primary school for Enfield in one of the areas zoned for community, social or educational facilities. The number of children in St. Mary's Primary School is nearing 500 no. and the knock-on impact on secondary schools is already beginning to be felt. The Council is urged to show more forward planning in preparing for the secondary school education of the young people of Enfield and its environs.

Managers Response

It is considered that the substantive response to the significant number of submissions outlined previously on page 64 addresses the points raised in this submission.

Recommendation

No change required.

SEA / AA

No comment required.

Submission 1064	Maguire & Associates on b	ehalf of High Degree Construction
	Limited	

Summary of Main Issues Raised

A submission is made in relation to the evaluation of residentially zoned land and the ranking of sites within Enfield with particular reference to a site located in the southeast corner of the development boundary owned by High Degree Construction Limited. For clarity, the subject site was labelled as site H in the residential evaluation.

The principle points contained therein relate to the following points:

1. Analysis of physical planning and available infrastructure

An analysis of physical planning and available infrastructure for the 'ranked' sites has been carried out in Enfield. There are a number of sites (A, B, C, D, E, G, I, J, K and L) which are indicated to have no foul sewer available to service the lands. Further, the analysis summarises each site and indicates constraints such as land ownership, lack of road access or the landlocked nature of sites, lack of footpath, their current use and the topography of the sites. Based on the analysis, it is contended that sites D, G and L which ranked higher in the evaluation that the site the subject of the current submission (Site H) will be unable to be developed for residential use within any reasonable time frame. This is due to the fact that there is no access to 2 of the landholdings and the topography of 2 of the landholdings is unsuitable to accommodate residential development.

2. Justification for Site H to be included within Phase I residential land

The foul sewer is close by to service these lands. There is a cycleway and footpath running along the Main Street of Enfield, whilst there is a footpath all along the eastern boundary of the property adjoining the Ring Road. These lands are in close proximity to the Soccer Pitch and GAA Pitches. They are opposite the future secondary school proposal, while there is a new bus stop proposed quite close by. The lands are owned by High Degree Construction Limited who are developers with a long association with Enfield. The Company have previously provided lands for community and social infrastructure (1 acre provided to facilitate extension to the National School and 4 acres provided to the local Enfield Celtic Soccer Club, both free of charge) together with providing foul sewer and surface water infrastructure.

The submission provides additional factors which should have been taken into account in relation to the evaluation of residential lands. In particular, it proposes that additional criterion should have been included, namely infrastructure, physical suitability, community infrastructure, social infrastructure (secondary school) and zoning of commercial lands. On the basis of the scoring provided in the submission, the subject site now ranks 2nd out of the 12 sites assessed compared to joint 9th in the assessment undertaken by Meath County Council. Phase I should therefore release 6.84 hectares of Site H in lieu of sites D, G and L.

Managers Response

The manner in which the submission has attempted to provide an evidence basis to support their argument is noted and indeed welcomed. It is also acknowledged that the company on whose behalf the submission has been made has a long association with Enfield and that there has been significant community gain to the residents of Enfield arising from this association.

1. Analysis of physical planning and available infrastructure

It is acknowledged that the sewer would need to be extended to the west of the town to service sites A, B, C and D. However, these sites are not a significant distance from the existing sewer which is adjacent to the railway line and canal. Sites E and G are immediately to the rear of land

currently serviced by the sewer. Site I, J and K are not proposed within lands identified as Phase I residential. Site L is adjoining an existing residential scheme serviced by the sewer although the information provided in the submission indicated that the "foul sewer is close by". This is not definitive. The provision of piped water services to service any of the sites will be a matter for individual developers to agree with Irish Water and Meath County Council acting as an agent on their behalf. It is not considered necessary or appropriate therefore that the inclusion of this criterion is therefore appropriate or necessary as the likely cost of extending the existing piped services should not be significant.

Physical suitability or topographical constraints was taken into account in settlements where appropriate. It was not considered that this was required for Enfield. The submission contends that Site D, E, G, I, J, K and L have physical suitability constraints, all scoring 3, 4 or 5 in the submitted revised ranking table. It would appear that the submission may have considered lack of access as a physical suitability constraint; however access is a separate category. Site D is not elevated nor is it subject to flooding. While it could be argued that Site E is to the rear of the Main Street in a landlocked location, it forms part of a larger landholding which fronts onto the Main Street. Site G is not elevated. Sites I, J and K are all adjoining the ring road with no other potential access points available thus they scored poorly on access. However there are no obvious topographical constraints affecting such sites. Site L is significantly lower than the adjacent roundabout and ring road however it is at a similar level to adjoining developed residential land to the east. Having regard to the foregoing, it is not considered that a criterion should be added for topographical constraints in Enfield.

Land ownership is not taken into account in the residential evaluation or indeed in any decision taken as to whether or not to zone particular areas for particular uses. It is not a criterion which is considered appropriate when striving to attain the proper planning and sustainable development of an area or is it a criteria set down in the County Development Plan 2013-2019 when undertaking such an evaluation. A number of landholdings are indicated to be currently in agricultural use and unlikely to be released for development, however this is not viewed as a constraint. Further, one must be cognisant of the fact that 50% headroom has been built into the Core Strategy figures. There will still be adequate provision of residential zoned land to accommodate future projected population demands in Enfield.

Access to land parcels is vital and this was taken into account when carrying out the residential evaluation.

Site D is zoned B1 "Town Centre" land use zoning objective in the current plan and is envisaged to accommodate a maximum yield of 30 residential units. The site is well placed given its proximity to rail and road infrastructure and the linear park adjacent to the Canal. The land is not highly elevated nor is it subject to flooding. The Council acknowledges that there may be a case to be made regarding the need for additional B1 "Town or Village Centre" lands west of the canal however it needs to be taken into account that this draft Variation is primarily focused on addressing the overhang of both residential and commercial lands. Under the review of the current County Development Plan 2013-2019 likely to occur in 2017, the appropriateness of all lands with the benefit of a land use zoning objective will be revisited.

The Council identified an access to site G off the regional road to the south through a derelict residential property as well as through the gap between dwellings along the adjoining minor county road which is accepted as being restricted in width. This site can accommodate approximately 51 no. residential units and this number would be subject to demonstrating compliance with the relevant standards at development management stage. Access to site L could be provided through an existing residential development, noting that two hammerheads adjoin these lands.

2. Justification for Site H to be included within Phase 1 residential land

Site H is on the periphery of Enfield. At its nearest, it is approximately 600 metres from the edge of the town centre. It is not considered appropriate to justify its inclusion on the basis of a future secondary school to which the Department of Education & Skills have made no commitment to and a future proposed bus stop. In the event that a new secondary school is delivered to the east of Enfield, this would be taken into account under the review of the County Development Plan 2013-2019. Given the provision of a secondary school in Enfield is not on the Department of Education and Skills current 5 year plan, it is unlikely to be delivered within the lifetime of the County Development Plan 2013-2019. This further substantiates that including the proposed secondary school in the residential evaluation would be premature at this stage. The proximity of the site to existing soccer and GAA pitches is noted. However, it is contended that if including a criteria for community infrastructure, one would have to include the linear park along the canal which is at the opposite end of the town. In relation to the foregoing, it is considered that including one additional criterion for community infrastructure would not result in the subject site being included in Phase I.

It is noted that the submitted evaluation considers the commercial zoning of a site as being less favourable than a site identified for residential use. No basis for this has been submitted and the Council would have thought that the opposite would be more logical in promoting a mixed use form rather than a mono use. In any event, it is not considered necessary to include such a factor.

On the basis of the foregoing, it is not considered that a compelling argument has been made which would warrant a reconsideration of the residential evaluation provided. It is therefore respectfully suggested that the subject lands are retained as Phase II residential.

Recommendation

No change required.

SEA / AA

No comment required.

Submission 1071	O'Connor Sutton Cronin & Associates in association with Future
	Analytics Planning, Research & Economic Consultants and
	Fewer Harrington Partnership Architects & Planners on behalf of
	The Rybo Partnership

Summary of Main Issues Raised

The submission is in relation to 70.86 hectares (175 acres) of land in the ownership of The Rybo Partnership located to the east of Enfield. A detailed submission has been received with respect to the identification of these lands as "White Lands" in the land use zoning objectives map for Enfield.

It is noted and welcomed that:

- 1. The lands are identified as Strategic.
- 2. There is flexibility noted in the introduction to the proposed variation which may allow lands identified as Phase II or White Lands to be considered for development during this period.

- 3. It is the stated intention of the Planning Authority to prepare a strategy to create an Employment Zone / Business Park in Enfield as part of the M4 Corridor. It is considered that this objective shows the direction and intent of the Planning Authority that the lands may be identified in a separate policy document relating specifically to the M4 Corridor.
- 4. It is stated that the acceptability of specific proposals for development on the lands within the timeframe of the existing Development Plan will be considered on their merits.

The submission contains a detailed report outlining the policy, planning and economic rationale in support of amending the policy framework and land use zoning objectives as they relate to the subject lands. The following issues are raised as a negative and conflicts with the policies as presented:

- 1. The zoning of the majority of the lands is White Lands.
- 2. The introductory section of the Variation indicates that there is flexibility included in the Strategic Policy Framework which may allow lands identified in Phase II or White Lands to be considered for development within this period. Further, the subject lands "White Lands" are not identified in SP 4. The foregoing conflicts with the Enfield Written Statement which indicates that it is not generally envisaged that development proposals will be brought forward during the life of this Development Plan for the subject lands.
- 3. The Variation states that it is considered that there are sufficient available lands within the Business Park to accommodate employment related uses over the lifetime of the Plan. These lands are specifically identified as Phase 1 of the Order of Priority.
- 4. The Variation retains zoning of those lands identified as FP2 in the 2009 Enfield LAP with a portion specifically identified as Phase II (post 2019). It is highlighted that no activity has taken place on these lands since the adoption of the 2009 LAP whilst it is argued that the subject lands are more suitable to accommodate development of employment uses.
- 5. No indication is offered regarding the suitability or otherwise of individual uses on the lands.
- 6. No timeframe is presented for the strategy for the M4 Corridor to be completed.

Furthermore, it is requested that the land use zoning objectives map be amended to contain a mixture of the following zonings on these lands:

- 1. E1 Strategic Employment Zones (High Technology Uses): To facilitate opportunities for high technology and major campus style office based employment within high quality and accessible locations.
- 2. E3 Warehousing & Distribution: To facilitate logistics, warehousing, distribution and supply chain management inclusive of related industry facilities which require good access to the major road network.
- 3. G1 Community Infrastructure: To provide for necessary community, social and educational facilities.
- 4. B1 Commercial/Town or Village Centre: To protect, provide for and/or improve town and village centre facilities and uses.
- 5. (new zoning) R2 Transport Interchange: To provide for necessary transport and associated uses.

Managers Response

Enfield is acknowledged in the Regional Planning Guidelines for the Greater Dublin Area 2010-2022 as an economically active independent town with less dependence on commuting for population growth. It is important that the investment in social infrastructure in such locally significant towns is at a higher level, equivalent to larger size centres in recognition of their role as key centres for a very large rural hinterland and for surrounding smaller villages and towns. Enfield is identified as a Level III Town Centre in the Retail Hierarchy. It is not identified in the Economic Strategy as being a Primary or Secondary Economic Centre. Enfield is identified as a Small Town in the Settlement Hierarchy contained in the Meath County Development Plan 2013-2019.

The current area of built land in Enfield comprises approximately 72.87 hectares (180 acres). This submission advocates the zoning of an additional 70.86 hectares (175 acres). This is inappropriate particularly for a settlement designated as a Small Town in the settlement hierarchy. The subject lands comprise 30.8 hectares (76 acres) of zoned land under the proposed draft Variation No. 2 with the remainder comprising of unzoned land outside the development boundary envelop. Of the 30.8 hectares which have a land use zoning objective applied to them, there are three land use zonings contained therein, namely: G1 'Community Infrastructure', B1 'Village/Town Centre' and WL 'Whitelands'. The majority of the site, some 24.6 hectares, is identified with a 'White Lands' land use zoning objective.

In relation to the request to amend the land use zoning objectives map, it should be noted that the County Development Plan 2013-2019 clearly stipulates that an E1 "Strategic Employment Zones (High Technology Uses)" land use zoning objective is only appropriate in Navan, Drogheda, Dunboyne and Maynooth Environs. These settlements are all designated either Large Growth Town I or Large Growth Town II in the settlement hierarchy. The zoning of land for E1 use objective is not appropriate in Moderate Sustainable Growth Towns, Small Towns or Villages. There is an area of over 5 hectares identified adjoining the White Lands identified for G1 "Community Infrastructure" land use zoning objective. This is primarily to accommodate educational facilities and is considered both appropriate and adequate at this time. There is a section of the site which is zoned B1 "Town or Village Centre" is the proposed draft Variation. This was changed from B3 land use zoning objective which referred to "Neighbourhood Centre" use under the Enfield Local Area Plan 2009 in order to be consistent with the County Development Plan 2013-2019 land use zoning objectives. Given that the lands are removed from the town centre, it would not be appropriate to accommodate an expanded area at this location for town centre uses. This would militate against the proper planning and sustainable development of the town centre. It is not within the scope of this draft Variation to introduce a new land use zoning objective (R2 Transport Interchange), as suggested in the submission, which is not compatible with the zoning objectives set down in the County Development Plan 2013-2019.

A number of further issues were raised in the submission and are addressed as follows:

 There is flexibility for employment lands identified as Phase II where a specific proposal is submitted which cannot be accommodated on Phase I lands within that settlement. However, as stated in the County Development Plan 2013-2019, it is not generally envisaged that development proposals will be brought forward during the life of this Development Plan for the subject lands.

It is considered that the Introductory Statement needs to be amended accordingly as it is in conflict with the Strategic Policy direction contained in the Enfield Written Statement.

The written statement for each centre provides detail on the rationale which determined which lands would be identified for release during the period of the County Development Plan 2013 – 2019. It should be noted that there is flexibility included in the Strategic Policy framework which may allow lands identified in Phase II or White Lands to be considered for development within this period.

- It is considered that sufficient lands have been identified in Enfield to accommodate employment generating uses over the lifetime of the County Development Plan having regard to the status of Enfield in the Settlement and Economic Hierarchies. The existing Enfield Industrial Estate and Business Park are the most appropriate location to direct employment generating uses. The Business Park which extends to an area of 8.7 hectares is sufficient in size to accommodate employment related uses over the lifetime of the County Development Plan 2013-2019 in Enfield. Strategic Policy SP 4, set down in the Enfield Written Statement relates solely to an E2 'General Enterprise & Employment' land use zoning objective and not White Lands. As such, no reference is made in same to White Lands.
- It is considered that there are sufficient lands identified within Phase 1 employment lands to accommodate employment uses in Enfield over the life time of the County Development Plan 2013-2019. There are currently vacant units within the Industrial Estate and opportunities to expand the Business Park which comprises an area of 8.7 ha.
- The non activity of lands previously identified as FP 2 (LU OBJ 2 in the draft proposed Variation) since the adoption of the 2009 LAP is noted. The employment lands within this area are identified as Phase II Enterprise Lands and will be revisited on review of the County Development Plan 2013-2019 expected in 2017.
- Given that it is not intended that the subject lands will be developed over the life time of the current County Development Plan 2013-2019, it would be premature to be more prescriptive on individual land use zonings contained therein. This will be reviewed under the review of the County Development Plan 2013-2019 expected in 2017. It is also noted that the Council are presently undertaking the preparation of an Economic Strategy for the County which will be incorporated into the County Development Plan by way of subsequent variation. This will also consider the identification of Strategic Sites for employment creation. It is considered premature therefore to consider the subject lands for development until such time as this Strategy has been completed and an indication given regarding the strategic nature or otherwise of the subject lands in a sub regional and county wide perspective.

It is considered that the text included in the Written Statement for Enfield indicated that it is the intention of the Council to prepare a strategy to create an Employment Zone / Business Park in Enfield as part of the M4 Corridor should also be omitted pending the completion of the County Economic Strategy which is being undertaken by the Planning & Economic Directorates jointly this year. This statement in the narrative of the Written Statement was not substantiated in the form of an objective and does not relate to an objective in the County Development Plan, Volume I. It appears to have its origins in the existing Enfield Local Area Plan Written Statement (2009) whereby the existing LAP would "Prepare a strategy to create an Employment Zone/ Business Park in the M4 Corridor". It is respectfully suggested to omit same from the narrative.

Recommendation

It is considered that the Introductory Statement (Section 6.0 Evaluation of Employment Lands) needs to be amended accordingly as it is in conflict with the Strategic Policy direction contained in the Enfield Written Statement.

The written statement for each centre provides detail on the rationale which determined which lands would be identified for release during the period of the County Development Plan 2013 – 2019. It should be noted that there is flexibility included in the Strategic Policy framework which may allow lands identified in Phase II or White Lands to be considered for development within this period.

To remove the following statement at the end of Section 1.0 Town Concept of the Enfield Written Statement

It is the intention of the Planning Authority to prepare a strategy to create an Employment Zone/ Business Park in Enfield as part of the M4 Corridor.

SEA / AA Comment

Screened out; no comment required.

Submission 1092 Enda Flynn (Principal of St. Mary's Primary School, Enfield)

Summary of Main Issues Raised

The increasing number of primary school children attending St. Mary's National School since 2003 has been outlined. It is indicated that these numbers indicate the need for a post primary school in Enfield.

Managers Response

It is considered that the substantive response to the significant number of submissions outlined previously on page 64 addresses the points raised in this submission.

Recommendation

No change required.

SEA / AA

No comment required.

Submission 1105 William Carey (includes submission from Kildare V.E.C)

Summary of Main Issues Raised

The submission is in relation to the provision of a post-primary school in Enfield. It is indicated that the current population of Enfield primary school is 472 and not 404 as indicated in paragraph 06, page 336 of the Enfield Written Statement. Further, it is highlighted that the extension now taking place, adding a further 8 no. class rooms, means that next year Enfield will have 560 pupils and growing.

Councillor William Carey has resubmitted a submission prepared by Mr. Sean Ashe on behalf of Kildare V.E.C in July 2011. It was previously submitted in relation to Variation No. 12 which sought to incorporate a Core Strategy to the Meath County Development Plan 2007-2013. The submission deals with four key areas in the Meath/Kildare area. The issues raised in relation to the Enfield and Johnstownbridge area are as follows:

Growth targets for the Enfield and Johnstownbridge area as envisaged in the Regional Planning Guidelines (RPGs) and the then Meath County Development Plan 2007-2013 are highlighted. Enfield and Johnstownbridge owing to their location on the M4/M6 corridor and served by rail are worth highlighting. Although located within the Hinterland Area, these settlements should be a focus for future development. This is in accordance with the provisions of the RPGs. It is requested that Meath County Council take cognisance of and plan for educational facilities in light

of the need to enhance the educational offering in a manner which is compatible with the 'radial multi-modal growth corridors' envisaged by Meath County Council in the Core Strategy and Regional Planning Guidelines.

Managers Response

The increased primary school population in Enfield is noted. The figures detailed in the Written Statement are taken from the 2011 Census; they did not purport to be the number of children attending the local national school. The number of children attending the national school as provided in the submission is acknowledged.

The submission by Kildare V.E.C was written in 2011 for submission on an entirely different document. Therefore, there are elements contained therein which are not relevant to the current Variation being considered. It is noted, however, that it specifically refers to education in Enfield and Johnstownbridge area. Following on from Councillor William Carey's cover letter, it is this section of the submission which is responded to as follows:

It is respectfully considered that the substantive response to the significant number of submissions outlined previously on page 64 adequately addresses the points raised in this submission.

Recommendation

No change required.

SEA / AA

No comment required.

Submission 1108 Declan Clabby on behalf of Michael Dellmere

Summary of Main Issues Raised

The submission requests the zoning of land in Enfield. The land is currently in agricultural use and outside the development boundary. It is recommended that the land be zoned for housing (A2 "New Residential" land use zoning objective). The submission highlights that other lands immediately to the east have been brought within the development boundary and contends that the subject lands are better placed for development. The following case has been put forward for the zoning of the lands:

- Proximity to town centre the lands fall within the 500m and 1000m radius from the town centre and is similar to the housing in the Dellmere housing estate;
- Availability of public transport all bus stops and train station are within 500m and 1000m radius similar to the housing in the Dellmere estate;
- Availability of community and social infrastructure the primary school on Johnstown road falls within 1000m from the lands and is easily accessible;
- Availability of roads and services The existing estates namely Dellmere and Rathdale both have adequate road network which have prearranged to accommodate a development from these lands in the future;
- Infill site these lands is not deemed as being infill owing to the railway to the north, lands zoned as "White Lands" to the east, the housing developments to the west and lands zoned G1 "Community Infrastructure" to the south.

Managers Response

The justification put forward by the landowner is considered reasonable. However, although the lands to the east which are identified with a "White Lands" land use zoning objective under the proposed Variation, they were not zoned previously; they were included within a Framework

Plan. The Written Statement in the Enfield Local Area Plan 2009 included an objective for the development of these lands for a mixture of uses. Therefore, there was a reasonable expectation that the lands were to be developed in the future. It is in this context that it was considered appropriate to include these lands within the development boundary now proposed however it has been made clear that it is not generally intended to develop these lands over the life time of the County Development Plan 2013-2019. The suitability of the lands along with all other lands will be considered under the review of the County Development Plan 2013-2019. It is not within the scope of this Variation to review the appropriateness of all existing zoning nor is it within the scope of this Variation to increase the amount of lands zoned for residential uses. The main purpose of Variation No. 2 is to address the overhang of residentially zoned lands which currently exists and bring the amount of residentially zoned land in line with the household allocations set down in the Core Strategy of the County Development Plan 2013-2019. A full review of all land will be carried out on review of the County Development Plan 2013-2019 expected in 2017. It is at this point that requests for zoning additional lands for residential uses should be submitted.

Recommendation

No change required.

SEA / AA

No comment required.

7.4. Longwood

Submission 1106 Geraldine Fahy on behalf of Michael Weir

Summary of Main Issues Raised

The submission requests an amendment to the proposed draft Variation No. 2 to facilitate lands in Longwood to be developed within the lifetime of this plan period 2013-2019 in accordance with the residential land use zoning objective A2 "New Residential". The land comprises an area slightly less than 1 hectare (2.4 acres) located to the southwest of the village centre of Longwood. It is argued that the subject lands would be more suitable for release as part of Phase I than the lands which have been identified for release. A justification has been put forward for the inclusion of the subject lands within Phase I residential as follows:

- The location of the site in close proximity to the village centre and nearby amenities;
- The pattern of development in the area;
- The infill nature of the site which is surrounded by residential development;
- The limited size of the site which would provide for a limited scale of development, and;
- The development of the subject lands would be preferable to the zoning of other lands which would be dependent on the construction for a road for access.

It is contended that having regard to the above, the release of the subject lands for residential development within Phase I in the Order of Priority would accord with the sequential approach and policies/objectives set out in the Written Statement of the proposed Variation and would therefore accord with the proper planning and development of the area.

Managers Response

The land to be released for residential development over the lifetime of the Plan has been chosen on the basis of an evidence based approach which is in accordance with the County Development Plan 2013-2019. As indicated under Section 5 of the Introduction to the Written Statement for the Variation, 'For the smaller development centres corresponding with Villages in the Settlement Hierarchy, it is considered that the application of the sequential approach from the defined village

centre is sufficient to identify the most suitable site for release as part of Phase I Residential which corresponds with the life of this Development Plan. Longwood is designated a village in the settlement hierarchy. On the basis of the sequential approach, there are other lands zoned for residential use closer to the village centre than the subject lands which can accommodate the 40 no. unit household allocation. The justification outlined by the landowner is noted however to release the subject lands over the lifetime of the Plan would be contrary to the provisions of the Core Strategy.

Recommendation

No change

SEA / AA

No comment required.

7.5. Summerhill

Submission 1104 Philip and Bridget Cantwell

Summary of Main Issues Raised

The submission requests the zoning of a 3.2 hectare (8 acre) field in between the Hillview Housing Estate and Dangan Primary School in exchange for the transfer of ownership of a section of land to the front of the site to complete a "critical footpath". It is requested that the land be zoned to provide substantially for housing and/or a nursing home or other residential institutional type use. The submission highlights the urgent need to continue this section of the footpath along the entire frontage of the subject lands in order to provide safe access for the children of Summerhill to walk to school. The safety of residents with disabilities is also emphasised. A number of conditions are outlined relating to the proposal i.e. mature trees are to be pruned by a suitably qualified tree surgeon only and left in a safe state, Meath County Council's solicitors liaise with the landowners solicitor in the transfer of ownership, Meath County Council accepts full liability and insurance for this transferred property and the Council provide a water connection from water mains at the road boundary beside the entrance to the subject lands at the Summerhill entrance when this work is being done to facilitate agricultural use.

Managers Response

The zoning of the subject lands for any use would result in the expansion of the existing development boundary rather than the consolidation of the existing settlement. There are a significant amount of lands within the development boundary which are now identified as Residential Phase II. Thus to zone the subject lands would be contrary to the evidence based approach of releasing residential land closest to the village centre in the first instance. This evidence based approach is in line with the County Development Plan 2013-2019. Further, there are other lands already zoned within the development boundary which could be rezoned to community use. It would not be appropriate to leap frog such sites to zone the subject lands. The Manager contends that should such a need be identified at any stage over the life of the current County Development Plan, the Council has a wide range of powers available at its discretion noting the existence of the footpath opposite.

Recommendation

No change required.

SEA / AA

No comment required.

8. Ashbourne Local Area Plan

Submission 1065 Stephen Little & Associates on behalf of Granbrind Limited

Summary of Main Issues Raised

This submission is in relation to a site of approximately 8.56 hectares at Baltrasna, Ashbourne.

Achieving Core Strategy Figures and land ownership issues

It is indicated that a Framework Plan was submitted in 2011 for the lands at Milltown. In the preparation of the Framework Plan for the lands at Milltown, it is indicated that it became apparent that one of the landowners had no interest in a) being involved in the Framework Plan process or b) in developing their lands. The breakdown of landownership is included in the submission. It is contended that the non-participation of the owner of this land (identified as Parcel B and identified for release as Phase I lands) causes a very real difficultly for the Council in meeting its Core Strategy obligations over the lifetime of the Plan. It is emphasised that in tandem with the inclusion of zoned lands within Flood Zones A & B, this must result in the Council's target for households in Ashbourne under the Core Strategy being unachievable. It is requested that the Council discount the area of zoned lands within Flood Zones A & B and disregard the lands identified with an A2 land use zoning objective immediately to the north of the subject site as these will not deliver on the Council's obligations under the Core Strategy for the County and the Region as a whole during the lifetime of the Plan. In tandem, it is stated that the subject lands (H and I on the residential evaluation maps for Ashbourne) are owned and independently controlled by Granbrind Ltd who is the only landowner within this immediate area that has been prepared to make a planning application on their lands.

Planning History and Phase II designation of site

The submission strongly objects to their lands being located within Phase 2 of the planned expansion of Ashbourne. It is indicated that there is a current application on the subject site for a ten year permission for 188 no. residential units, 1 no. crèche, new vehicular entrance off Hickey's Lane, etc. It is indicated that the zoning of these lands for A2 "New Residential" reaffirms the Council's stance that they form an appropriate location for the expansion of the town to occur. Further, it is argued that in many respects the subject lands score as well or better than other lands zoned for development and which are included in Phase II.

Managers Response

Achieving Core Strategy Figures and land ownership issues

The landholding referred to as Parcel B amounts to approximately 7.6 hectares in extent. Apart from extant permissions which allow for a staggering total of 1,322 no. units to be constructed, there are 17.32 hectares of land identified for A2 "New Residential" land use zoning objective (Phase I) in the proposed Draft Variation No. 2 for Ashbourne. Given the fact that 50% headroom has already been built into the Core Strategy figures for all settlements, there is an adequate provision of residentially zoned land to accommodate future population demands in Ashbourne up to 2019, without Parcel B being developed. This was made clear in Section 2 of the Written Statement for Ashbourne in the proposed draft Variation No. 2. Land ownership is not taken into account in the residential evaluation in Ashbourne or elsewhere. It is not a criterion which is considered appropriate when striving for proper planning and sustainable development nor is it a criteria set down in the County Development Plan 2013-2019. Further, existing extant permissions could be implemented or subsequently amended to take into account Flood Zones A & B. Thus it is not possible to say at this point that there will be a decrease in the number of

units pursuant to extant permissions in Ashbourne or the significance of any such decrease in achieving the household allocation for Ashbourne.

Planning History and Phase II designation of site

The subject site is identified as Phase II (Post 2019) and placed 8th (Site H & I) in the ranking of residential lands evaluated. It is noted that a planning application was submitted on the subject lands (Site H & I) on the 13th January 2014 (planning register ref. no. DA140010 refers) after the publication of the proposed Variation No. 2. This is not considered a valid reason to justify the release of these lands under the proposed Variation. Further, in accordance with CS OBJ 1 of the Meath County Development Plan 2013-2019, 'planning applications for residential development on greenfield lands (i.e. 'A' zonings) in the urban centres detailed in Table 2.1 will be considered premature until such time as the relevant Town Development Plan or Local Area Plan has been made, varied or amended or development objectives for the particular centre incorporated into the development plan by way of variation (CS OBJ 3 refers) to make each statutory land use strategy consistent with the settlement strategy and core strategy, particularly Table 2.4, of this Development Plan. It is not appropriate to comment further with regard to a current planning application.

It is accepted that the subject lands are identified with a residential land use zoning objective in the 2009 Ashbourne Local Area Plan. This proposed Variation is charged with reviewing the existing quantum of residentially zoned land and ensuring that the quantum of land identified for release adheres to that contained in the Core Strategy and in particular the allocation contained in Table 2.4 therein.

The proposed draft Variation states in Section 3.6 of the Introduction "Phasing of Lands" that

It should be noted that the inclusion of lands in Phase II which is indicated as being required beyond the life of the present County Development Plan i.e. post 2019, will not infer a prior commitment on the part of Meath County Council regarding their future zoning for residential or employment purposes during the review of the present plan and preparation of a new County Development Plan expected to occur during the 2017 – 2019 period. Any subsequent decision will be considered within the framework of national and regional population targets applicable at that time, the Core Strategy and the proper planning and sustainable development of County Meath.

Having undertaken the evaluation of residentially zoned lands, Parcel B is considered better placed than the subject lands (Site H and I) in terms of its proximity to the town centre and education facilities. It would be inappropriate to leapfrog Parcel B to allow Sites H & I to be released for residential development over the lifetime of this County Development Plan 2013-2019 and it would be contrary to the Core Strategy to designate lands in excess of that contained in Table 2.4 Housing Allocation & Zoned Land Requirements to be released over the lifetime of the Plan. The main purpose of Variation No. 2 is to address the overhang of residentially zoned lands which currently exists and bring the amount of residentially zoned land in line with the household allocations set down in the Core Strategy of the County Development Plan 2013-2019.

Recommendation

No change required.

SEA / AA

No comment required.

Submission 1068	Future Analytics Consulting on behalf of Messrs. Sean Quinn and
	David Rogers

Summary of Main Issues Raised

The submission requests the re-zoning of 7 acres (2.83 hectares) of an 8.5 acre landholding from E2 "General Enterprise & Employment" to A2 "New Residential" land use zoning objective. The submission discusses a benchmarking against the criteria for evaluating residential lands, the suitability of the subject lands for residential development, provides an indicative residential layout for the subject lands and a justification for proposed land use zoning change.

The submission is summarised as follows:

The subject lands are bounded by Ashbourne Business Park to the west, zoned employment lands to the north, agricultural lands to the east and by Racehill Crescent and Racehill Park residential developments to the south. The existing vehicular and pedestrian access is to the south west of the site via the existing road network which also serves the adjacent residential development. It is argued that the subject site is more suited to a high quality, mid-density residential scheme that integrates into the existing residential development adjacent to the lands and conforms to the established residential character of the area. It is further highlighted that the lands can be easily serviced and brought forward for residential development in a timely manner, with access available from a point to the south-west of the site. The re-zoning of the subject lands to residential would consolidate and augment existing residential development and further prevent urban sprawl. Further, it is argued that such zoning would realign the quantum of residential development and employment development in the area. It is contended that having regard to the criteria used i.e. proximity to town centre, proximity to education, proximity to public transport, infill opportunity and whether the land is serviced, the subject lands are in many instances far more suited to residential development than some of the lands already zoned for same.

It is argued that there is limited supply of residential zoned land to the north and north east of the town. Further, a map has been submitted illustrating impediments such as flood risk on other lands in Ashbourne. It is contended that such a scheme would facilitate the expansion of the town in a compact and sustainable manner within the development boundary of Ashbourne and would contribute to the long term viability and vitality of Ashbourne.

The landowner is committed to bringing the lands forward for development. The subject lands have a potential yield of 45 no. units. While the evaluation criteria set out in the draft Variation document assesses the 'developable' nature of residentially zoned lands against different criteria, it is also important to distinguish between the suitability of a site and the likelihood of 'deliverability' during the plan period. The subject lands are available now, offer a suitable location for housing development, and, subject to the favourable support of the Council, there is a verifiable prospect that it will be developed in the short term.

Managers Response

This proposed Variation is charged with reviewing the existing quantum of residentially zoned land and ensuring that the quantum of land identified for release adheres to that contained in the Core Strategy and in particular the allocation contained in Table 2.4 therein. A notable over supply of residentially zoned lands was identified in Ashbourne allied to the significant number of residential units which can be developed on foot of extant planning permissions. It is not within the scope of this Variation to review the appropriateness of all existing land use zoning objectives or to increase the amount of lands zoned for residential uses.

It is acknowledged that rezoning within the existing development boundary would be preferable to expanding the development boundary. However Ashbourne as a Moderate Sustainable Growth Town requires a significant amount of lands identified for commerce, enterprise and employment uses. However, it is anticipated that a full review of all land use zoning objectives for Ashbourne will most likely occur as part of the review of the County Development Plan 2013-2019 scheduled to occur in 2017 or as part of the review of the existing Ashbourne Local Area Plan LAP notwithstanding the incorporation of land use zoning objectives for this area into the County Development Plan. No decision has yet been taken by the Planning Authority in this regard. It is respectfully suggested that it would be at this full review stage that it would be advisable to make a submission regarding rezoning or new zoning in Ashbourne.

Notwithstanding the above, having considered the location of the subject lands against the evaluation criteria, it is considered that it would be ranked 6^{th} as follows:

Proximity to town centre			
Proximity to education			
Proximity to public transport	3		
Infill Opportunity			
Land Serviced			
Total:	15		
Ranking:			

Thus, even if the subject lands were currently zoned for residential use, they would not be released over the lifetime of the Plan. It is noted that the subject lands adjoin existing residential development and could potentially be suitable for residential development in the future. However, an adequate buffer would need to be provided between industrial uses and future residential uses. Further, the subject lands are accessed via the end of Race Lane. Race Lane is a narrow road that already services a significant number of dwellings and the ability of this lane to service additional dwellings would need to be considered by the Roads Department.

The evaluation of residential zoned land followed an evidence based assessment which is in line with regional planning policy. The 50% headroom built into the Core Strategy figures, will address any issues of deliverability and ensure adequate provision of residential zoned land to accommodate future population demands in Ashbourne up to 2019.

Having regard to the above and the foregoing, it is considered that, it would not be appropriate at this time to rezone the subject lands to residential uses.

Recommendation

No change required.

SEA / AA

No comment required.

Submission 1084 The Planning Partnership on behalf of Eracase Limited

Summary of Main Issues Raised

The submission seeks the inclusion of a site that is currently unzoned located north of Hunters Lane in Ashbourne. It is submitted that the current omission of the subject lands from the development area boundary is respectfully contended as being illogical in respect of the pattern of associated development and neighbouring zoned lands and unsustainable where, the 'leap-frogging' of lands sequentially preferable will occur. Furthermore the subject lands, when presented against the evaluation criteria for identifying suitable lands for residential zoning, both

match and exceed the scoring of the significant majority of other lands identified Residential Phase I within Ashbourne. The lands benefit from being fully serviced and the landowners have retained full legal rights of connection across the lands. There is a legal right of way maintained to the lands to the rear through Ashwood Green estate. This was made clear in drawings submitted in connection with planning application register ref. no. DA20401.

Managers Response

This proposed Variation is charged with reviewing the existing quantum of residentially zoned land and ensuring that the quantum of land identified for release adheres to that contained in the Core Strategy and in particular the allocation contained in Table 2.4 therein. A notable over supply of residentially zoned lands was identified in Ashbourne allied to the significant number of residential units which can be developed on foot of extant planning permissions. It is not within the scope of this Variation to review the appropriateness of all existing land use zoning objectives or to increase the amount of lands zoned for residential uses.

The Council would accept that the subject lands could be favourably considered in the context of preparing a new land use zoning framework for Ashbourne. However, it is anticipated that a full review of all land use zoning objectives for Ashbourne will most likely occur as part of the review of the County Development Plan 2013-2019 scheduled to occur in 2017 or as part of the review of the existing Ashbourne Local Area Plan LAP notwithstanding the incorporation of land use zoning objectives for this area into the County Development Plan. No decision has yet been taken by the Planning Authority in this regard. It is respectfully suggested that it would be at this full review stage that it would be advisable to make a submission regarding rezoning or new zoning in Ashbourne.

Recommendation

No change required.

SEA / AA

No comment required.

Submission 1085	The Planning Partnership on behalf of Kingscroft Developments
	Limited

Summary of Main Issues Raised

The submission seeks the rezoning of land presently identified with an F1 "Open Space" to A2 "New Residential" land use zoning objective at Brindley Park and the deletion of Social Policy 42 (SOC POL 42), 'to maintain free from development lands that are subject of a deed of dedication or identified in planning permission as open space to ensure the availability of community and recreational facilities for the residents of the area (Section 5.10.2 of the Meath County Development Plan 2013-2019.

Approach to Evaluation of Residential Zoned Land

It is indicated that the Planning Authority, in its land evaluation matrix, unnecessarily restricted the sample to only vacant (greenfield) residentially zoned lands, while lands with residential potential (brownfield) and residential intensification potential lands have not been included. It is argued that a review of the Planning Authority's land evaluation matrix should have regard to:

- The potential intensification of brownfield/residential development lands;
- The effective utilisation of current available serviced lands in sequentially more preferred locations, and;

 An assessment of the likely house delivery dates on lands benefitting from extant permissions which are due to expire within the lifetime of the Plan, without the benefit of extending the life of duration of the relevant planning permission.

It is argued that the intensification and effective utilisation of serviced lands is considered sustainable.

Deletion of SOC POL 42

It is argued that this policy should be deleted as it presents a contradiction to the principles of proper planning and sustainable development associated with high quality open space design for amenity purposes as described in the County Development Plan under Section 5.10.2 Public Open Space, Social Policy 32 (SOC POL 32) and the details associated with Open Space Standards as outlined under Section 11.2.2.2 of Chapter 11 Development Management Guidelines and Standards of the Development Plan.

Managers Response

Approach to evaluation of residential zoned land

This proposed Variation is charged with reviewing the existing quantum of residentially zoned land and ensuring that the quantum of land identified for release adheres to that contained in the Core Strategy and in particular the allocation contained in Table 2.4 therein. A notable over supply of residentially zoned lands was identified in Ashbourne allied to the significant number of residential units which can be developed on foot of extant planning permissions. It is not within the scope of this Variation to review the appropriateness of all existing land use zoning objectives or to increase the amount of lands zoned for residential uses. In any event, it is not considered that the subject site could be classified as a brownfield site. It is a buffer zone between the more sensitive residential land use to the east and the general enterprise and employment zone to the west.

Deletion of SOC POL 42

It is not generally within the scope of this Variation to revisit policies which have been adopted as part of the County Development Plan 2013-2019. The referenced policy has been included in the previous two County Development Plans following a number of attempts by developers to seek planning permission on areas of public open space identified in the layout plans for housing developments when permitted. This policy is considered reasonable and necessary to prevent such attempts being made in future.

A detailed planning history of the subject site indicates that the area in question was clearly identified as open space in the permitted development, planning register ref. no. 99/2431 refers. The subject lands were subsequently identified as public open space in the 2001 County Development Plan and have remained as such since. In 2004, planning permission was refused to construct 88 no. dwellings on the subject lands, planning register ref. no. DA40249 refers. 2 no. subsequent applications to construct dwellings on the subject lands were withdrawn. It is therefore considered that the manner in which the argument has been framed in this submission is misleading to the intended benefit of the landowner on whose behalf it has been submitted.

Recommendation

No change required.

SEA / AA

No comment required.

Submission 1088 Wherity Chartered Surveyors on behalf of Thomas Gannon.

Summary of Main Issues Raised

The submission requests the inclusion of:

- a) a roundabout junction on the N2 at the northwest point of the Ashbourne Development Plan boundary, and;
- b) a proposed link road from this roundabout to the Curragha Road.

It is contended that the inclusion of these proposals would significantly assist in relieving the existing traffic congestion and delays on the Curragha Road and the N2 junction. The proposed roundabout would also provide direct access onto FP OBJ 3 lands and the adjacent Fingal County Council lands, zoned for GE, '*To provide opportunities for general enterprise and employment*. The current traffic situation is outlined and in particular the manner in which this roadway is used for the ever expanding Tayto Park.

Managers Response

The proposal could not be considered favourably for the following reasons:

- The junction upgrade arrangements in this vicinity should be considered under the project to upgrade the N2 between the Rath Roundabout and Kilmoon Cross. There is a specific objective contained in the County Development Plan in this regard (TRANS OBJ 17 refers).
- 2. The Curragha Road is not the appropriate route to direct visitors to Tayto Park and the submitter is referred to the approved haul routes from the N2 at Primatestown signalised junction. The proposal would undermine the plans that have been put in place to designate a more appropriate access route via the R155 Regional Road.
- 3. The access to the development lands is not covered by the location of the 'exceptional circumstance' indicated on Map 6.4.6 in the County Development Plan. The proposal would thus be considered contrary to the official policy contained in the Spatial Planning & National Roads Guidelines for Planning Authorities (January 2012).

Recommendation

No change required.

SEA / AA

No comment required.

Submission 1100	Submission	by	McGill	Planning	on	behalf	of	Frank	Nowlan
	(Receiver)								

Summary of Main Issues Raised

The submission is generally supportive of the revisions to the Ashbourne LAP proposed under Variation No. 2 but wishes to seek clarification in relation to Policy FR POL 3 with reference to lands at Churchfields which is subject to extant planning permissions.

The landowner's intention for the future development of the subject lands has been outlined along with the considerable planning history over the past decade. Their intentions involve revising the permitted overall scheme to provide a different mix and layout of residential units to replace apartment elements with own door proposals of various densities. It is acknowledged that the previous permissions were granted prior to the national 'Planning System and Flood Risk Management Guidelines', the Strategic Flood Risk Assessment (SFRA) for County Meath and the

Flood Risk Assessment and Management Plan (FRAMP) prepared as part of the proposed Variation No. 2. The landowner acknowledges the need to apply and adhere to flood risk management measures however is considers that the specific wording of Policy FR POL 3 is unnecessary and inappropriate in advance of a detailed site specific flood risk assessment being prepared and associated measures yet to be completed for these lands. The specific part of FR POL 3 that is of concern is in bold: 'The Flood Risk Assessment shall consider the Sequential Approach within the subject site and would typically involve allocating water compatible development within Flood Zones A and Zone B'.

It is argued that the extent of the indicative Zone B is based on calculations derived from site levels measured during 2010 - 2011 when the site was effectively under construction. Site clearance and soil stripping had occurred across the lands and site levels had been lowered temporarily. The site levels recorded were therefore lower than the actual finished ground levels (FFLs) and FFLs granted under the parent permission and subsequent modifications. Therefore, the extent of Zone B as per the Variation Maps is based on temporary and incorrect site levels, and as a result is more extensive.

Given the above, it is requested that the sentence referenced above from FR POL 3 be revised as follows:

'The Flood Risk Assessment shall consider the Sequential Approach within the subject site and would typically involve allocating water compatible development within Flood Zones A and those areas of Zone B identified in the Justification Test'.

Managers Response

The wording of FR POL 3 is considered appropriate and allows for submission of an appropriately detailed Flood Risk Assessment for any future planning applications for the lands in question. The onus is placed on the applicant to define the existing Flood Zone A and B as relevant to current conditions. On this basis the application of the Sequential Approach and Justification Test must still be applied in line with the Planning Guidelines and WS POL 29-36 as contained in the existing County Development Plan Vol. 1. It is recommended that the applicant engage with the Planning Authority at pre-planning stage to discuss the proposed application and resulting Flood Risk Assessment.

The permitted finished floor levels were made known to JBA Consulting in the preparation of the SFRA to inform this proposed draft Variation. JBA Consulting noted that Flood Zone B extends across some of the permitted residential application areas and the permitted finished floor levels were stated at 65.15 and upwards which are greater than 150 mm above previous ground levels and should successfully pass through the Development Management Justification Test. Phase VI of the permitted development is located within Flood Zone C.

Recommendation

No change required.

SEA / AA

No comment required.

9. Dunboyne/Clonee/Pace Local Area Plan

Submission 1003 Martin Lonergan, Dunboyne College of Further Education

Summary of Main Issues Raised

The submission requests that a site would be zoned to accommodate Dunboyne College of Further Education. The submission suggests that lands of at least 6 to 10 acres would be optimal and identifies a number of characteristics that the lands should demonstrate including access, services and integration with the town.

Manager's Response

The Council has considered the submission lodged. It has been indicated consistently throughout this Manager's Report that the scope of the review of existing land use zoning objectives undertaken in this Variation is restricted in nature and does not purpose to be a complete review of the land use zoning strategy of individual urban centres. However, this response followed in most instances a request to identify unzoned lands for a particular use (either for residential or employment use) or to rezone a site from employment, open space or community infrastructure use to residential. In this instance however, it considered that an exception to this approach is required and indeed warranted.

The Dunboyne/Clonee/Pace Local Area Plan already includes the following objective:

EDU OBJ 6

To facilitate the development of post primary, post leaving cert and Third Level educational facilities at the 'G1' lands at Rooske Road in conjunction with the College and Meath VEC.

The Council has reviewed the lands identified in the land use zoning objectives map for Dunboyne with a view to satisfying the requirements of Dunboyne College of Further Education. The primary objective of the Council is to ensure that the lands identified will be released for their intended purpose, are centrally located to ensure that the maximum benefit derives to Dunboyne from a commercial perspective and that the site is well served by public transport. Significant areas of lands have been identified off the Rooske Road for G1 "Community Infrastructure" land use zoning objectives. The existing Gaelscoil has established on part of these lands whilst planning permission has been granted to St. Peter's GAA Club to develop 2 no. pitches north of the Athletics' Track. There remains 1.38 hectares (3.4 acres) of lands available for development noting that there is an extant permission for a nursing home on part of said lands although no attempt has been made to implement same. In addition, there are a further 2 hectares (4.6 acres) of land which adjoin this area which have been identified with a F1 "Open Space" land use zoning objective due to the site being located within the identified Flood Risk Zones. This latter site is in the ownership of Meath County Council. It is considered that the combined site area of 3.38 hectares (8 acres) would satisfy the stated requirement for the College of Further Education whilst noting that the proximity of the site to the GAA and Athletics club could facilitate the sharing of sporting facilities. The Council can change the land use zoning objective from F1 "Open Space" to G1 "Community Infrastructure" land use zoning objective albeit qualified that it has an interface with Flood Risk Zones A & B and that only less vulnerable uses shall be located therein. However, it is considered that the positioning of car parking, open space, etc. associated with the College could be located on said lands. This approach has been adopted elsewhere as part of this variation.

Recommendation

To amend the land use zoning objective from F1 "Open Space" to G1 "Community Infrastructure" on a 2 hectares (4.6 acres) site and to indicate that the subject site has an interface with Flood Risk Zones A & B.

To include a specific objective in the Dunboyne

LU OBJ

To provide for the development of Dunboyne College of Further Education on lands identified with a G1 "Community Infrastructure" land use zoning objective adjoining Dunboyne Castle Hotel as identified on the land use zoning objectives map.

SEA/AA Comment

Screened out; no comment required.

Submission 1048 Denis Leonard, Dunboyne College of Further Education

Summary of Main Issues Raised

The submission requests that appropriate lands are zoned for educational purposes to serve the college. The college presently occupies premises in the industrial estate in Dunboyne and shares some facilities with St. Peter's College, Dunboyne. It is stated that the college has the potential to expand its services but that it is obstructed in this aim by the lack of a single facility and the fragmented delivery of educational services. The submission suggests that lands of at least 6 to 10 acres would be optimal and identifies a number of characteristics that the lands should demonstrate including access, services and integration with the town.

Manager's Response

See response to Submission No. 1003

Recommendation

See recommendation to Submission No. 1003

SEA/AA Comment

None required

Submission 1054 Declan Brassil & Co, Chartered Planning Consultants, on behalf of Hickcastle Ltd & Hickwell Ltd

Summary of Main Issues Raised

The submission relates to unzoned lands adjoining Bracetown Park. It requests that the land be included within the boundary of Bracetown Business Park and Hub Logistics Park, and designated as E2 "General Enterprise & Employment" and E3 "Warehousing & Distribution" land use zoning objectives, similar to the existing Business Parks' zoning. It is contended that the Manager's Reports on the preparation of the Dunboyne/Clonee/Pace LAP at different stages during the LAP preparation recommended that the identified 'White Area' identified in the submission be included within the zoning boundary but subsequently was not included due to a mapping oversight. It is requested that this be rectified at this juncture.

Manager's Response

The Manager regretfully accepts the history associated with this landholding as presented in this submission and does not dispute the facts as presented. However, the request to zone additional lands for industrial or employment uses must now be considered in the context of the subsequent Economic Strategy set out in the Meath County Development Plan 2013-2019 as it relates to Dunboyne and the existing provision of zoned land in the area. It states that:

"It is considered both appropriate and opportune to review the nature, location and quantum of lands zoned for employment uses to the east of the M3 Motorway / R147 (former N3) at Dunboyne / Clonee. The relative merits of retaining such lands in favour of promoting the lands which adjoin the lands east of the rail line in Dunboyne and / or M3 Parkway rail station, particularly for people intensive employment uses should be undertaken as part of this review. This should be carried out as part of the integrated land use and transportation assessment in consultation and agreement with stakeholders including the NTA, NRA and larnród Éireann to determine the future direction of growth in the Dunboyne / Clonee corridor. The review should also critically consider the likelihood of water services capacity being available to serve the preferred lands and the timeframes for providing same."

Objective ED OBJ 2 states, inter alia:

"To incorporate a review of the appropriateness of the nature, location and quantum of industrial and employment generating land use in individual Development Plans and Local Area Plans and in the preparation of development and zoning objectives for towns and villages that are to be included in the County Development Plan. This review shall:

- i) occur in tandem with the assessment of residentially zoned lands required pursuant to the Core Strategy (CS OBJ 2 & 3 refer);
- ii) apply the land use zoning objectives contained in the Core Strategy of this County Development Plan to the individual Town Development Plan, Local Area Plan or individual objective maps to be included in the County Development Plan as relating to industrial and employment generating uses (land use zoning objectives E1, E2 and E3 refer from the Core Strategy);
- iii) critically assess the nature, quantum and location of lands identified for industrial and employment generating use in Dunboyne/Clonee/Pace, Kells and Gormonston/ Stamullen. In the case of Dunboyne/Clonee/Pace, the integrated land use and transportation study identified as a high level development objective in Section 4.1.4 will be required to be completed in advance of this exercise being carried out. As part of this integrated land use and transportation study, Meath County Council will consult and agree the future location and appropriate scale of development, particularly in the knowledge intensive, science based and people intensive employment sectors with statutory stakeholders including the NTA, NRA and larnród Éireann;
- iv) review of the zoning objectives for Maynooth Environs and Kilbride in the preparation of zoning maps for the centres for inclusion in the County Development Plan.

The outcome of this review may necessitate variations to individual development plans and amendments to local area plans arising therefrom. It is noted that such variations or amendments may be subject to an Appropriate Assessment of the likely significant effects on Natura 2000 sites due to the proximity of urban centres to Natura 2000 sites." [emphasis added]

The strategy clearly sets out the need to review the appropriateness of the existing employment related land use zonings in the wider Dunboyne area. The integrated land use and transportation study is ongoing at present and taking into account Objective ED OBJ 2, it is considered premature to consider identifying further lands for industrial use until such time as it has been completed. It is noted that an extension of duration of planning permission for the development of the Hub Logistics Park at Bracetown was granted in 2010 thus catering for the expansion of the Park in the short to medium term. Furthermore, there remain significant lands which have the benefit of a land use zoning objective but are without the benefit of planning permission noting that a previous attempt to develop these lands proved unsuccessful. It is respectfully considered that the submitter has significant lands remaining available to allow for the incremental expansion of the existing successful Bracetown Business Park and Hub Logistics Park in the short to medium term.

Recommendation

No change recommended.

SEA/AA Comment

No comment required.

Submission 1055 Declan Brassil & Co. on behalf of Matt Brady

Summary of Main Issues Raised

The submission refers to two plots of land in Clonee. The first of these is located south of the Main Street and is identified as F1 "Open Space" land use zoning objective in the proposed Variation. The land had been zoned for residential use in the Dunboyne Clonee Pace Local Area Plan 2009 and the submission seeks the reinstatement of that zoning objective. It is argued that the site is not subject to flood risk and is suitable for development based on a number of stated criteria, including the sequential approach, physical characteristics and approach taken to land evaluation in the variation.

The second plot of land is situated to the south of the village centre and is part of the site which has extant planning permission for 601 no. units. These lands are identified in the Strategic Flood Risk Assessment as being at an interface with Flood Risk Zones A and B. The submission seeks changes to the text of the variation to recognise the contribution that the extant permission could make towards the achievement of household targets. Suggested text has been provided in this regard.

Manager's Response

This submission has been referred to JBA Consulting who carried out the Strategic Flood Risk Assessment for the proposed draft Variation. They note that the Map in Section 5.33 of the Strategic Flood Risk Assessment clearly shows that the site along the Main Street is within Flood Zone A, but is also located in a defended area. In relation to defended areas; the core principle of the Guidelines still applies and highly vulnerable or less vulnerable development should still be preferentially avoided.

The level of extant planning permissions in place was taken into account by Meath County Council in the Core Strategy of the Meath County Development Plan 2013-2019, when establishing the overall household growth for the county. The planning permission for the lands in question was factored into these calculations, in which extant permissions were subtracted from the county household allocation prior to the allocation of units to each settlement and the rural area (see Section 2.3.2 of the Meath County Development Plan 2013-2019). It is considered that the extant permission in question has been satisfactorily taken into account. Moreover, the site of the application in question is in parts subject to flood risk, some of which is behind the

River Tolka Scheme defences. The Strategic Flood Risk Assessment has specifically commented on the appropriate course of action for the site taking into account its planning history and this, combined with the text of the draft Variation as it concerns household numbers for Dunboyne and Clonee, is considered adequate and appropriate.

Recommendation

No change recommended.

SEA/AA Comment

No comment required.

Submission 1072	O'Connor Sutton Cronin & Associates on behalf of Mr Michael
	Brennan

Summary of Main Issues Raised

The submission relates to lands at Portan in Clonee and seeks the zoning of the lands to facilitate their development for employment/enterprise and residential uses. The lands abut other lands zoned for employment purposes to the south and the lands zoned at Bracetown for employment purposes to the north. The proposal is argued for on the basis of the location of the lands and adjoining land uses, regional and local planning policy although it should be noted that some of the references have been superseded by the adoption of more recent iterations of policy documents and decisions on planning applications by An Bord Pleanála. The submission includes an infrastructure strategy for the lands prepared by Consulting Engineers.

Manager's Response

The request to zone additional lands for industrial uses must be considered in the context of the Economic Strategy set out in the Meath County Development Plan 2013-2019 as it relates to Dunboyne and the existing provision of zoned land in the area. that:

"It is considered both appropriate and opportune to review the nature, location and quantum of lands zoned for employment uses to the east of the M3 Motorway / R147 (former N3) at Dunboyne / Clonee. The relative merits of retaining such lands in favour of promoting the lands which adjoin the lands east of the rail line in Dunboyne and / or M3 Parkway rail station, particularly for people intensive employment uses should be undertaken as part of this review. This should be carried out as part of the integrated land use and transportation assessment in consultation and agreement with stakeholders including the NTA, NRA and larnrod Éireann to determine the future direction of growth in the Dunboyne / Clonee corridor. The review should also critically consider the likelihood of water services capacity being available to serve the preferred lands and the timeframes for providing same."

Objective ED OBJ 2 states, inter alia:

"To incorporate a review of the appropriateness of the nature, location and quantum of industrial and employment generating land use in individual Development Plans and Local Area Plans and in the preparation of development and zoning objectives for towns and villages that are to be included in the County Development Plan. This review shall:

- i) occur in tandem with the assessment of residentially zoned lands required pursuant to the Core Strategy (CS OBJ 2 & 3 refer);
- ii) apply the land use zoning objectives contained in the Core Strategy of this County Development Plan to the individual Town Development Plan, Local Area Plan or individual objective maps to be included in the County Development Plan

- as relating to industrial and employment generating uses (land use zoning objectives E1, E2 and E3 refer from the Core Strategy);
- iii) critically assess the nature, quantum and location of lands identified for industrial and employment generating use in Dunboyne/Clonee/Pace, Kells and Gormonston/ Stamullen. In the case of Dunboyne/Clonee/Pace, the integrated land use and transportation study identified as a high level development objective in Section 4.1.4 will be required to be completed in advance of this exercise being carried out. As part of this integrated land use and transportation study, Meath County Council will consult and agree the future location and appropriate scale of development, particularly in the knowledge intensive, science based and people intensive employment sectors with statutory stakeholders including the NTA, NRA and larnród Éireann;
- iv) review of the zoning objectives for Maynooth Environs and Kilbride in the preparation of zoning maps for the centres for inclusion in the County Development Plan.

The outcome of this review may necessitate variations to individual development plans and amendments to local area plans arising therefrom. It is noted that such variations or amendments may be subject to an Appropriate Assessment of the likely significant effects on Natura 2000 sites due to the proximity of urban centres to Natura 2000 sites."

The strategy clearly sets out the need to review the appropriateness of the existing employment related land use zonings in the wider Dunboyne area. The integrated land use and transportation study is ongoing at present and taking into account Objective ED OBJ 2, it is considered premature to consider identifying further lands for industrial use until such time as it has been completed. It should also be noted, that the lands referred to in this submission are located in Clonee, whereas Dunboyne is the urban centre which is defined as a Secondary Economic Growth Town and a Large Growth Town II. There are significant lands zoned for employment purposes in Clonee which are considered adequate to meet the requirements of Clonee, which is designated as a Village in the settlement hierarchy set out in Chapter 2 and Chapter 3 of the Meath County Development Plan 2013-2019.

Furthermore, it is noted that the lands are located outside of the built up area of Clonee and Dunboyne. The use of the lands for residential purposes would result in a community isolated from any supporting services and facilities. It is not considered that the proposal would be consistent with the 'Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities' (DoEHLG, 2009) or in the interests of the sustainable development of the area.

The submission was also referred to JBA Consulting, who prepared the Strategic Flood Risk Assessment and Management Study which informed this variation as the subject lands are located in a wider area subject to flood risk. They have advised that consideration of these lands for development purposes would need to adhere to the to the Sequential Approach and Justification Test as set out 'The Planning System and Flood Risk Management Guidelines for Planning Authorities'. They have further noted that there are a number of small watercourses draining the lands that are not subject to Flood Zone mapping; consideration would need to be given to the potential impact of these watercourses using other sources of information.

In light of the response detailed in the preceding paragraphs, further examination of these issues is not considered warranted.

Recommendation

No change recommended.

SEA/AA Comment

No comment required.

Submission 1073	O'Connor Sutton Cronin & Associates on behalf of the Hilltown
	Partnership

Summary of Main Issues Raised

The submission concerns lands at Hilltown, southwest of Clonee which are outside of the boundary of the Local Area Plan and are unzoned. It seeks the inclusion of a strategic objective to provide for a new rail station at Hilltown and the rezoning of lands in the area for an integrated development based around a new town/village centre incorporating a park and ride facility, residential and employment uses, a public park and community facilities. The submission is accompanied by an assessment undertaken by Consulting Engineers.

Manager's Response

The Core Strategy of the Meath County Development Plan 2013-2019 highlighted that there is an excess of residentially zoned land in the county, which the proposed Variation No. 2 to the Plan has sought to address. Given this situation, there is no justification for the zoning of additional residential zoned lands particularly in the location referred to in the submission which is at a substantial remove from existing urban centres.

The potential of the Dunboyne area for employment uses is discussed in the Meath County Development Plan 2013-2019 (Section 4.1.4 of the Development Plan refers). The request to zone additional lands for industrial uses must be considered in the context of the Economic Strategy set out in the Meath County Development Plan 2013-2019 as it relates to Dunboyne and the existing provision of zoned land in the area. It is considered that the same response presented with respect to submission no. 1072 is equally applicable to this submission.

The strategy clearly sets out the need to review the appropriateness of the existing employment related land use zonings in the wider Dunboyne area. The integrated land use and transportation study is ongoing at present and taking into account Objective ED OBJ 2, it is considered premature to consider identifying further lands for industrial use until such time as it has been completed. In light of the foregoing, it would not be appropriate to proceed in the manner advocated in the submission.

Recommendation

No change recommended.

SEA/AA Comment

No comment required.

Submission 1078 Declan Brassil & Co. on behalf of McGarrell Reilly

Summary of Main Issues Raised

The submission relates to lands at Pace, north Dunboyne. It welcomes the general content of the proposed variation as it relates to the Pace area and suggests a number of amendments to it. These include:

- 1. Combining "Objective F" and the "White Lands" zoning objective into a single Zoning Objective with associated specific development objectives;
- 2. Including specific objectives to reinforce the connectivity of the site to the established road and movement networks;

- 3. Extending the zoning objective to the west of the currently zoned area to include further lands in their ownership;
- 4. Specifying a strategic housing allocation for the Pace lands;
- 5. Including a specific objective for the completion of the IFPLUTS and Framework Plan in parallel with the Variation process to facilitate development within the lifetime of the current Development Plan;
- 6. Making all relevant Settlement, Economic and Retail Objectives of the County Development Plan consistent with the Objectives for the lands in accordance with the changes effected in Variation No. 2;
- 7. Providing a Site Specific Flooding Objective which allows for a review and reallocation of Open Space areas based on the findings of a Site Specific Flood Risk Assessment.

Proposed text associated with the suggested amendments is outlined in the submission.

Manager's Response

The existing text of the Meath County Development Plan 2013-2019 makes specific reference to the lands at Pace/North Dunboyne. It states that:

"Meath County Council considers that an opportunity for a Strategic Development Zone may exist in north Dunboyne within the Metropolitan Area of the National Gateway.² This will require the completion of an integrated land use and transportation approach to planning for the area, in consultation and agreement with statutory stakeholders including the NTA, NRA and Iarnród Éireann, including an examination of traffic demands and modal share, determination of the operational capacity of the junction with the M3 Motorway and potential effects on same and the sustainable build out of the existing settlement of Dunboyne. This is consistent with the promotion of higher densities for employment uses around public transport as advocated in the RPGs which indicates that the "provision of integrated land use and transport plans for developing zoned and brownfield / regeneration lands of strategic importance are a means of managing growth and investment in the medium to long term and should be prepared". Unparalleled economic development opportunities exist adjacent to M3 Parkway which would allow the development of a strategic employment cluster, possibly based on the Strategic Development Zone concept. Potential exists to develop a synergy between this area of Dunboyne and Maynooth Environs in relation to complementary Life Science / SMART Park campuses in partnership and collaboration with established third level institutions. Following the finalisation of the integrated land use and transportation approach to planning for this area, it is the intention of the Planning Authority to progress the consideration of a Strategic Development Zone for employment generating uses within the Dunboyne / Pace area to the Department of the Environment, Community & Local Government. It is an objective of the Planning Authority to progress the relevant studies seeking to advance this Strategic Development Zone designation within a timely fashion following the completion of the integrated land use and transportation approach to planning for this area;"

generation of communication technology, sustainable energy supplies.

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² The Regional Planning Guidelines 2010-2022 states that opportunities exist for Planning Authorities and Enterprise Agencies, together with other relevant stakeholders, to take a proactive role in identifying appropriate locations for Strategic Development Zones for employment and develop planning schemes to deliver these areas for economic development. These strategic locations should be supported by existing or planned multi-modal public transport infrastructure, adequate water services, broadband and next

The integrated land use and transportation study referred to is at an advanced stage of completion. At present, the impact of the emerging preferred land use strategy on the existing transport network is being modelled. When this exercise has been completed, the Council will reengage with the NTA, NRA, Iarnród Éireann – Irish Rail and DoECLG. The Elected Members will also be consulted with and kept informed of progress on this important project. It is hoped that this exercise can be completed within the first half of this year and that the final Strategy will inform the review of the existing Dunboyne Clonee Pace LAP which is scheduled for 2015 notwithstanding the incorporation of land use zoning objectives for this area into the County Development Plan.

In the intervening period, all of the existing lands identified for employment generating uses which includes the lands identified for the Level II Town Centre in the existing Local Area Plan inclusive of their development objectives had been incorporated into the text of the proposed Variation No. 2 to the Meath County Development Plan 2013 – 2019. A comparison of the wording of PACE OBJ 1 and PACE OBJ 2 included in proposed Variation No. 2 with RET OBJ 5 and EMP OBJ 8 contained in the existing Dunboyne Clonee Pace Local Area Plan will confirm this statement. The wording of PACE OBJ 1 in particular stated that "the preparation of the Framework Plan shall have regard to and generally be consistent with the Integrated Framework Plan for Land Use and Transportation as required pursuant to in the Meath County Development Plan 2013-2019". No development was therefore assumed to be forthcoming until the IFPLUT has been completed and the IFPLUT underpins the identified location in the statutory land use plan for the Level II Town Centre. If this does not occur, the basis of the need for the Framework Plan dissipates. It is the opinion of the Council that there was no expectation of development occurring at this location until the IFPLUT has been completed and the recommendations of same integrated into the statutory land use framework for the area.

However on reflection, the Council accepts that the wording of PACE OBJ 1 & 2 as suggested in the draft Variation present certain difficulties and may in fact be inconsistent with the policy framework presented in Volume I of the County Development Plan. The wording of PACE OBJ 1 presents a clear expectation of a Level II Retail Centre occurring at Pace which may not be realised if the IFPLUT does not validate this location. It is suggested therefore that a degree of flexibility needs to be incorporated into the suggested policy framework which allows for different outcomes to emerge as a result of the preferred land use strategy contained in the IFPLUT. It is also considered that the clear emphasis contained in the County Development Plan for this area related to the strategic employment potential of the area being promoted rather than the promotion of a Level II Town Centre. It is considered that an evidential basis is required to determine the future range and scale of appropriate uses at this location.

It is therefore suggested that the wording of these objectives be altered as follows:

Pace OBJ 1

The County Development Plan Volume I (section 4.1.4 Ashbourne / Dunboyne refers) indicates that it is a high level development objective to require the preparation of an Integrated Framework Plan for Land Use and Transportation (IFPLUT) for the area of North Dunboyne. Following the completion of, and to give effect to, the recommendations of the IFPLUT, the Planning Authority shall To prepare a unitary Framework Plan for the identified lands designated Level 2 Retail Centre at Pace which will address land use, transportation, connectivity, urban design, recreation and implementation issues. Delivery of the Level 2 Retail Centre appropriate scale and level of development shall be phased and co-ordinated in tandem with infrastructural provision across the Corridor Area. It shall be a grounding objective of this Framework Plan to encourage development in a sustainable, co-ordinated and efficient manner where such development is facilitated and accompanied by the required infrastructure and services.

The Framework Plan shall provide, inter alia:

- 1: for retail floorspace and associated facilities to include some high density and other appropriate residential development commensurate with population growth over the time period of the County Development Plan having regard to the commitment in the Regional Planning Strategy for Dunboyne to grow from a Level 3 to a Level 2 Centre gradually over a 15 20 year timeframe;
- 2. high end office based employment uses at levels commensurate with its location and proximate to a multi-modal public transport interchange;
- 3.—a pedestrian and cycle route over the M3 Motorway to lands to the east subject to the agreement of the National Roads Authority.

The preparation of the Framework Plan shall have regard to and generally be consistent with the Integrated Framework Plan for Land Use and Transportation as required pursuant to in the Meath County Development Plan 2013-2019 and other policies and objectives of the County Development Plan, the Regional Planning Guidelines and the 2008 – 2016 GDA Retail Strategy.

Pace OBJ 2

The County Development Plan Volume I (section 2.9.6 Primary Land Use Zoning Categories refers) indicates that an integrated land use and transportation approach to planning will be applied to this area which may require the reconsideration of the White Lands in north Dunboyne (Pace) within the life of this Development Plan. Following the completion of, and to give effect to, the recommendations of the IFPLUT, the Planning Authority shall To consider the need to provide additional lands other than those identified pursuant to Pace OBJ 2 for strategic employment use predominantly for high end office development on lands adjacent to the emerging preferred location for the future Level 2 Centre at Pace on a phased basis within the life of the County Development Plan as identified on the land use zoning objectives map.

It would thus be premature to consider making amendments of the nature proposed in this submission prior to the completion of the IFPLUT. The content of the proposed Variation as it relates to Pace/North Dunboyne largely reiterates the content of the Dunboyne/Clonee/Pace Local Area Plan reflecting this situation. However, in this instance, it is considered that an intervention is required. Similarly, the allocation of household units to this area would be inappropriate and premature at this time.

The submission was also referred to JBA Consulting, who prepared the Strategic Flood Risk Assessment and Management Study. They have noted that Section 1.5 of the submission incorrectly identifies F1 areas as corresponding to 'pockets of pluvial flooding and then recommends that these can be relocated within the Framework Plan area as part of the suggested FR POL 4. Areas identified with an F1 "Open Space" land use zoning objective correspond to areas within Flood Zone A/B (fluvial flooding) and includes for areas of flooding predicted by the Tolka Flood Study as well as the Eastern Catchment Flood Risk Assessment & Management Plan Flood Risk Review & Preliminary Flood Risk Assessment maps. It is therefore not possible to relocate areas of flooding as suggested.

They have further noted that any change in land use zoning should adhere to the Sequential Approach and Justification Test as set out in 'The Planning System and Flood Risk Management Guidelines for Planning Authorities'. Consideration has not been given to this in light of the reasons set out above.

Recommendation

Additional Policies for Dunboyne Clonee Pace Local Area Plan

1. Amend the wording of Pace OBJ 1 & 2 as follows:

Pace OBJ 1

The County Development Plan Volume I (section 4.1.4 Ashbourne / Dunboyne refers) indicates that it is a high level development objective to require the preparation of an Integrated Framework Plan for Land Use and Transportation (IFPLUT) for the area of North Dunboyne. The IFPLUT shall also identify the manner in which Dunboyne shall gradually grow to a Level II Town Centre by 2028 as provided for in the Retail Strategy for the Greater Dublin Area. Following the completion of, and to give effect to, the recommendations of the IFPLUT, the **Planning Authority shall** To prepare a unitary Framework Plan for the identified lands designated Level 2 Retail Centre at Pace which will address transportation, connectivity, urban design, land recreation implementation issues. Delivery of the Level 2 Retail Centre appropriate classes and level of development shall be phased and co-ordinated in tandem with infrastructural provision across the Corridor Area. It shall be a grounding objective of this Framework Plan to encourage development in a sustainable, co-ordinated and efficient manner where such development is facilitated and accompanied by the required infrastructure and services.

The Framework Plan shall provide, inter alia:

- 2.—for retail floorspace and associated facilities to include some high density and other appropriate residential development commensurate with population growth over the time period of the County Development Plan having regard to the commitment in the Regional Planning Strategy for Dunboyne to grow from a Level 3 to a Level 2 Centre gradually over a 15 20 year timeframe;
- 3. high end office based employment uses at levels commensurate with its location and proximate to a multi-modal public transport interchange;
- 4.—a pedestrian and cycle route over the M3 Motorway to lands to the east subject to the agreement of the National Roads Authority.

The preparation of the Framework Plan shall have regard to and generally be consistent with the Integrated Framework Plan for Land Use and Transportation as required pursuant to in the Meath County Development Plan 2013-2019 and other policies and objectives of the County Development Plan, the Regional Planning Guidelines and the 2008 – 2016 GDA Retail Strategy.

Strategic Environmental Assessment and Appropriate Assessment of the IFPLUT shall be carried out.

Pace OBJ 2

The County Development Plan Volume I (Section 2.9.6 Primary Land Use Zoning Categories refers) indicates that an integrated land use and transportation approach to planning will be applied to this area which may require the reconsideration of the White Lands in north Dunboyne (Pace) within the life of this Development Plan. Following the completion of, and to give effect to, the recommendations of the IFPLUT, the Planning Authority shall To consider the need to provide additional lands other than those identified pursuant to Pace OBJ 1 for strategic employment use predominantly for high end office development on lands adjacent to the emerging preferred location for the future Level 2 Centre at Pace on a phased basis within

the life of the County Development Plan as identified on the land use zoning objectives map.

SEA/AA Comment

See comment on recommendation to submission no. 1043 by the National Roads Authority with regard to the amendments proposed to Pace OBJ 1 & 2.

Submission 1087 Ryan Nowlan Consulting on behalf of Glenbeigh Construction Ltd.

Summary of Main Issues Raised

The submission relates to lands on the Rooske Road, south of Dunboyne town centre which are indicated as Phase II in the proposed Variation. It is requested that the lands are designated for release in Phase I. The arguments in support of this are made with reference to the National Development Plan, the National Spatial Strategy and the Regional Planning Guidelines for the Greater Dublin Area. Reference is also made to the status of Dunboyne in the settlement and economic hierarchies of the Meath County Development Plan 2013-2019, and the household allocation for the town in the Core Strategy of that Plan.

It is argued that growth in Dunboyne is proceeding more slowly than in other settlements in Meath and is at variance with the status of the town in the county settlement hierarchy. In these circumstances, it is stated that development of lands with residential land use zoning should be encouraged rather than delayed.

The submission considers that Table 9 of the proposed variation as it relates to Dunboyne is misleading in respect of the quantity of land required for residential purposes in the town, quantity of available residential zoned land taking into account lands excluded due to flood risk and the household allocation in light of the assignment of Clonee's allocation to Dunboyne. It is requested that the table is amended to correct this.

The submission states that it was the intention of Glenbeigh Construction Ltd. to seek to develop the lands within the short term. The proposed Variation is not considered conducive to this. It is submitted that the statement in the proposed Variation "The timeline for release, if appropriate, of lands in Phase II will be considered post 2019 in accordance with the relevant Meath County Development Plan in place at that time" undermines the Development Plan process in that the Plan fails to deliver a clear statement for development policy upon Plan adoption. It is stated that the Planning Authority should allow for an earlier review of the release of phased residentially zoned lands and that the appropriate timing for such a review is at the statutorily prescribed interim review of the current Plan. It is submitted to be reasonable and prudent to allow for the bringing forward of lands indicated in Phase II of the residentially zoned landbank during Phase I where the development of Phase I lands does not materialise. It is suggested that additional text is included to give effect to this.

Manager's Response

Given the excess of residentially zoned lands available in Dunboyne, an evaluation exercise was carried out to establish the most suitable lands for release in the short term (coinciding with the life of the County Development Plan i.e. up to 2019). This is described in the proposed draft Variation. As a result of this, the lands referred to in this submission were included in Phase II. It is considered that sufficient lands have been identified to accommodate future household growth in Dunboyne given that the household allocation in Table 2.4 of the Core Strategy also includes headroom of 50%. There is no compelling argument provided in the submission which would require the Planning Authority to re-consider their position in this regard.

Table 9 in the section of the draft Variation dealing with the residential land evaluation in Dunboyne is intended to be an extract of Table 2.4 of the Core Strategy of the Meath County Development Plan 2013-2019 as it relates to the town. This is stated in the text above the table and is considered quite clear in its intent. In the interests of clarity, an additional table can be included in the text detailing the revised household allocation with the addition of the allocation from Clonee and illustrating the land areas following the exclusion of flood risk zones.

It is not accepted that the Development Plan is not providing a clear statement for development policy. The proposed Variation is exact in its detail of what lands are proposed for release in Phase I. The text referred to, "The timeline for release, if appropriate, of lands in Phase II will be considered post 2019 in accordance with the relevant Meath County Development Plan in place at that time", reflects the reality that the next Meath County Development Plan will have to adhere to the Government Guidance, Regional Planning Guidelines and other relevant policies that are in place at that time. Therefore, the Meath County Development Plan 2013-2019 cannot foresee what requirement there will be for residentially zoned land in the future. The text referred to in the submission acknowledges this.

Objective CS OBJ 9 in the Meath County Development Plan 2013-2019 requires that the two year progress report for the Development Plan should include details of the units permitted in the county in comparison with those allocated in the Core Strategy. This will allow Meath County Council to review the progress in achieving the household targets set out for each settlement. It should also be noted that the household allocations detailed in Table 2.4 of the Core Strategy include headroom of 50%. Therefore, allowance has already been made for situations in which some lands may not come forward for release during the lifetime of the Development Plan.

However, it must be equally acknowledged that the determination of the Order of Priority took a consideration period of time to prepare and this process still has potentially a number of months to complete before the Council can permit multiple residential developments on greenfield sites. The 2 year review must give weight to the time period which will have elapsed before planning permission will be forthcoming for such developments.

Recommendation

It is recommended to include an additional table and text as illustrated below into section 1 of the Dunboyne Local Area Plan Residential Land Evaluation (proposed new text is shown in red font):

"The total allocation for Dunboyne is thus revised to 1,578 no. units which require approximately 35 hectares of residential zoned land. This is shown in Table 9A which also includes revised figures for land availability which exclude those lands at risk of flooding (see Section 2 for further details).

Table 9A: Revised Household Allocation and Land Availability for Dunboyne

Household Allocation 2013- 2019	Av. Net Density Applicable unit/ha	Quantity of Residential Zoned Land Required	Available Land Zoned for Residential Use (ha)	Available Land Zoned for Mixed Use incl. Residential (ha)*	Total Available Zoned Land (ha)	Deficit/ Excess (ha)
1,578	45	35.1	65.9	0.561	66.5	31.4

*Note that the figure entered represents 30% of the total available mixed use land zoning, reflecting that residential uses would be subsidiary use in these zoning categories that relate to town and village centre sites and edge of centre sites.

"It is clear from Table 9 and 9A that there is an excess of residentially zoned land in Dunboyne in comparison to that now required to satisfy the household allocation."

SEA/AA Comment

Screened out; no comment required.

Submission 1095 TBS (The Big Space) on behalf of Sean Boylan

Summary of Main Issues Raised

The submission relates to two parcels of land; one to the south of the R156 and the railway station which are zoned for a mix of uses including open space, existing residential and new residential and the other relating to lands at Loughsallagh which are zoned for 'F1' (Open Space). It opposes the contents of the draft Variation which proposes to change the zoning of part of the lands south of the R156 from A2 "New Residential" to F1 "Open Space" land use zoning objective and for the inclusion of part of the lands in Phase II of the Order of Priority.

It is contended that an insufficient quantity of land has been identified to accommodate the household allocation taking into account the type and level of density set out for Dunboyne in Table 2.4 of the Core Strategy. Furthermore, it is argued that when revised density proposals are utilised, the level of over zoning is significantly reduced and would not justify de-zoning residential zoned land. It is also stated that this density applicable to Dunboyne is excessive and in conflict with current market demands for housing. It is suggested that a lower density of 35 units per hectare be applied to Dunboyne.

The conclusions of the Strategic Flood Risk Assessment (SFRA) as it relates to these lands are also queried. It is contended that the SFRA and the Justification Test carried out for part of these lands are inadequate. It is believed that the carrying out of a detailed site specific flood risk assessment at planning application stage would be a more appropriate solution for this site rather than re-zoning.

The submission states that the previous zoning relating to the lands at Loughsallagh is being removed in the proposed variation and replaced with Objective CER OBJ 1. It is stated that this change would not facilitate the relocation of the existing operations from opposite the rail station to Loughsallagh.

Manager's Response

Given the excess of residential zoned lands available in Dunboyne, an evaluation exercise was carried out to establish the most suitable lands for release in the short term (coinciding with the life of the County Development Plan i.e. up to 2019). This is described in the proposed draft Variation. This evaluation gave considerable emphasis to proximity to the rail station in Dunboyne, with this criterion receiving a double weighting. Part of the lands referred to in this submission was identified for release in Phase I, with the remainder included in Phase II. The densities set out in Table 2.4 of the Core Strategy represent average densities for each settlement to generate an estimated land requirement. Similarly, the figures for each land parcel in the evaluation provide an indicative density figure in order to estimate the potential yield of each parcel of land in the context of the overall household allocation. It is recognised that the density for each proposed development may vary from the figures shown. The guidance note for the A2 "New Residential" land use zoning objective states that "The appropriate density will be determined on a site by site basis having regard to the DoECLG Guidelines on Sustainable Residential Development in Urban areas and the positioning of the urban centre in the Settlement Hierarchy provided in the Core Strategy." This approach is expanded upon in Section 11.2.1 (Residential Density) of Chapter 11, Development Management Standards and Guidelines. The Dunboyne/Clonee/Pace Local Area Plan 2009 recognises the need to provide a variety of house types, e.g. objective RES OBJ 3 states "To achieve better and more appropriate mixes of dwelling sizes, types, tenure and accessibility in all new residential development". This will also have an impact on the density for each scheme. It is considered that there is sufficient flexibility built into the policy context for Dunboyne to allow for a density suited to the specifics of a site to be advanced to development management stage.

The figures outlined in Table 2.4 also include headroom of 50% to allow for circumstances where land identified in Phase 1 is not developed or other instances where a greater land take that initially estimated is required to accommodate the household allocation. Thus taking into account the above, it is not considered necessary to identify further lands for release in Phase I. This will be monitored over the course of the County Development Plan 2013-2019 with the 2 year progress report at the end of this year the first opportunity to review the take up or otherwise of lands identified for residential development noting the qualification made in this regard in the preceding submission response.

The second principal element of this submission related to lands at Loughsallagh and the future development of the site as previously indicated in the Dunboyne/Clonee/Pace Local Area Plan and the Meath County Development Plan 2013-2019. Reference is made in the submission to a statement in the Meath County Development Plan 2013-2019 that the lands at Loughsallagh are suitable for a "medical centre and also a wide variety of uses, subject to a masterplan for the area". However, the Meath County Development Plan 2013-2019 does not specifically reference the herbal medicine clinic or the lands at Loughsallagh at any point therefore it is not clear where this statement originates from. The Council is adamant that there is no such reference contained in the County Development Plan and reference to the contrary is incorrect and indeed misleading.

The Dunboyne/Clonee/Pace Local Area Plan 2009 makes a number of references to the operation of the herbal medicine clinic operated by Mr. Sean Boylan, e.g.

"... Within this context, the County Council welcomes the growth and development of most forms of employment at all scales. A key goal of the Council is to nurture homegrown enterprise to stimulate the local, regional and national economy. A perfect example of this in action is the Herbal Medicine Clinic at Edenmore, Dunboyne. The Clinic is operated by Sean Boylan and is a unique development which has made a significant contribution to the economy and reputation of the area. However, due to its location, the Clinic will be impacted upon by the construction and operation of the railway line. Accordingly, it is the policy of the Council to support and encourage the continued operation of the Clinic." (page 54)

Objective EMP OBJ 5: To support and encourage the continued operation of the Sean Boylan Herbal Medicine Clinic in Dunboyne.

Objective EMP OBJ 6: To provide a single landmark building of significant architectural merit to replace the existing Herbal Medicine facilities in Dunboyne. This building shall be accommodated on lands, outside the designated Flood Plain lands, identified on the land use zoning map.

The proposed objective in the draft Variation (Objective CER OBJ 1) states:

"Future Gateway Building To provide a single landmark building of significant architectural merit to replace the existing Herbal Medicine facilities in Dunboyne. This building shall be accommodated on lands, outside the flood risk zones A & B, identified on the land use zoning map. Any application submitted with respect to the subject lands

shall be accompanied by a suitably detailed Stage III Flood Risk Assessment and Management Plan as required pursuant to FR POL 1."

A comparison of the existing EMP OBJ 6 objective (LAP) and proposed CER OBJ 1 (Variation 2 objective shows that there is minimal difference between the two; with the requirement to carry out a flood risk assessment the only new addition. It is not therefore accepted that the proposed Variation renders any substantive change in the policy context for the lands at Loughsallagh with regards to their potential to accommodate a re-located herbal medical clinic. It is clear from the nature of the proposal submitted that a campus rather than a single building permissible under the existing and proposed policy framework is being advanced for consideration.

The submission has been referred to JBA Consulting, who prepared the Strategic Flood Risk Assessment and Management Study which informed this variation. The element of the submission prepared by the Consulting Engineers focuses on flood risk suggesting that the Strategic Flood Risk Assessment (SFRA) undertaken to inform the proposed Variation and Justification Test applied to the lands (Section A.2 of the SFRA), are inadequate and that the lands pass the Justification Test. The Justification Test was carried out by Meath County Council Planning Department and not JBA Consulting as assumed in the submission. The Council reiterate their view, as set out in their response to the Justification Test, that the lands cannot be said to meet all the criteria in Step 2 of the test as required.

To reiterate, under the "Planning System and Flood Risk Management Guidelines for Planning Authorities"; when zoning land, consideration must be given to the undefended scenario. It is noted that in the case of Dunboyne, the Castle Stream and the River Tolka have now been subject to a flood relief scheme. The works include for channel capacity improvements on the Castle Stream as well as embankments downstream of the site referred to in the submission. Other measures such as bypass culverts and bridge replacements were implemented on the River Tolka.

The flood relief scheme was designed to a finite specification that did not include for the 1 in 1000 year event. The scheme is therefore subject to residual risk if a flood with a return period greater than the design standard occurs. In addition, flooding from the River Tolka can also pose a potential flood risk to water levels on the Castle Stream as a result of backing up of flow. The impacts of a 1 in 1000 year event on the Tolka have not been defined in terms of the potential increase in level upstream on the Castle Stream.

All of the flood relief measures discussed above also require regular maintenance which, if not continued in perpetuity, will also result in a decrease in effectiveness and a subsequent residual increase in flood risk to surrounding lands. Due to the above considerations and the explicit detail under the Planning Guidelines; the precautionary approach should be applied and the lands rezoned to a less vulnerable land use. The Council had adhered to this approach accordingly.

Recommendation

No change recommended.

SEA/AA Comment

No comment required.

Submission 1103 ILTP on behalf of Eamonn Walsh

Summary of Main Issues Raised

The submission proposed a number of amendments to the draft Variation as it relates to Dunboyne town. These concern the zoning of 3 areas of land and the inclusion of a specific objective and additional pedestrian/cycle and bus routes. The changes requested in relation to zoning include:

- Amending the zoning of lands to the northwest of the town from industrial use to predominantly residential use with some open space zoning at the northern edge of the lands in question.
- Retaining the residential zoning of lands south of Sadlier Hall, which have been partly zoned for open space in the proposed Variation.
- Extend the industrial zoning of lands to the north of the town to unzoned lands.

A number of additional pedestrian/cycle linkages and bus routes are also proposed in the submission.

Manager's Response

The proposed Variation, and indeed the Core Strategy of the Meath County Development Plan 2013-2019, has highlighted that there is an excess of residentially zoned land in Dunboyne. The principal purpose of the proposed Variation as it relates to Dunboyne is to address this excess and ensure that only that quantity of land required to meet the household allocation for the town will be released over the lifetime of the County Development Plan up to 2019. In such circumstances, there is no justification to zone any further lands for residential purposes as proposed in this submission. However, it is anticipated that a full review of all land use zoning objectives for Dunboyne will most likely occur as part of the review of the existing Dunboyne Clonee Pace Local Area Plan notwithstanding the incorporation of land use zoning objectives for this area into the County Development Plan. It is respectfully suggested that it would be at this full review stage that it would be advisable to make a submission regarding rezoning or new zoning in Dunboyne.

The zoning of some of the lands south of Sadlier Hall was changed to F1 "Open Space" land use zoning objective arising from the recommendations of the Strategic Flood Risk Assessment which identified these lands as being within Flood Zone A. Thus a vulnerable land use such as residential would be inappropriate on these lands.

The request to zone additional lands for industrial uses has been considered in the context of the Economic Strategy set out in the Meath County Development Plan 2013-2019 as it relates to Dunboyne and the existing provision of zoned land in the area. It states that:

"It is considered both appropriate and opportune to review the nature, location and quantum of lands zoned for employment uses to the east of the M3 Motorway / R147 (former N3) at Dunboyne / Clonee. The relative merits of retaining such lands in favour of promoting the lands which adjoin the lands east of the rail line in Dunboyne and / or M3 Parkway rail station, particularly for people intensive employment uses should be undertaken as part of this review. This should be carried out as part of the integrated land use and transportation assessment in consultation and agreement with stakeholders including the NTA, NRA and larnród Éireann to determine the future direction of growth

in the Dunboyne / Clonee corridor. The review should also critically consider the likelihood of water services capacity being available to serve the preferred lands and the timeframes for providing same."

Objective ED OBJ 2 relates to this and states, inter alia:

"To incorporate a review of the appropriateness of the nature, location and quantum of industrial and employment generating land use in individual Development Plans and Local Area Plans and in the preparation of development and zoning objectives for towns and villages that are to be included in the County Development Plan. This review shall:

- i) occur in tandem with the assessment of residentially zoned lands required pursuant to the Core Strategy (CS OBJ 2 & 3 refer);
- ii) apply the land use zoning objectives contained in the Core Strategy of this County Development Plan to the individual Town Development Plan, Local Area Plan or individual objective maps to be included in the County Development Plan as relating to industrial and employment generating uses (land use zoning objectives E1, E2 and E3 refer from the Core Strategy);
- iii) critically assess the nature, quantum and location of lands identified for industrial and employment generating use in Dunboyne/Clonee/Pace, Kells and Gormonston/ Stamullen. In the case of Dunboyne/Clonee/Pace, the integrated land use and transportation study identified as a high level development objective in Section 4.1.4 will be required to be completed in advance of this exercise being carried out. As part of this integrated land use and transportation study, Meath County Council will consult and agree the future location and appropriate scale of development, particularly in the knowledge intensive, science based and people intensive employment sectors with statutory stakeholders including the NTA, NRA and larnród Éireann;
- iv) review of the zoning objectives for Maynooth Environs and Kilbride in the preparation of zoning maps for the centres for inclusion in the County Development Plan.

The outcome of this review may necessitate variations to individual development plans and amendments to local area plans arising therefrom. It is noted that such variations or amendments may be subject to an Appropriate Assessment of the likely significant effects on Natura 2000 sites due to the proximity of urban centres to Natura 2000 sites." [emphasis added]

The strategy clearly sets out the need to review the appropriateness of the existing employment related land use zoning objectives in the wider Dunboyne area. The integrated land use and transportation study is ongoing at present and taking into account Objective ED OBJ 2, it is considered premature to consider identifying further lands for industrial use until such time as it has been completed.

The provision of additional pedestrian/cycle and transport linkages between Dunboyne town centre and Dunboyne North can be best considered as part of the study referred to above. This will determine the most appropriate land uses in this area and attention can then be given as to how best to develop the lands in an integrated manner and how to generate connectivity with the surrounding area.

Recommendation

No change recommended.

SEA/AA Comment

No comment required.

Submission 1107 John Connaughton Ltd

Summary of Main Issues Raised

The submission relates to two parcels of land: one adjoining the train station in Dunboyne to the west and the second comprising of the lands to the east and north of the station.

The submission requests that part of these lands, which are presently unzoned, and located to the east of Dunboyne are zoned for A2 "New Residential" land use i.e. to provide for new residential communities with ancillary community facilities, neighbourhood facilities and employment uses as considered appropriate for the status of the centre in the Settlement Hierarchy', and designated for Phase 2 release if necessary. A justification is provided outlining the basis for this additional land use zoning to be considered.

The other lands, i.e. a site to the west of the train station, are zoned as F1 "Open Space" in the proposed Variation. It is requested that this is changed to A1 "Existing Residential" land use zoning objective which seeks to protect and enhance the amenity of developed residential communities.

Manager's Response

The proposed Variation, and indeed the Core Strategy of the Meath County Development Plan 2013-2019 has highlighted that there is an excess of residentially zoned land in Dunboyne. The principal purpose of the proposed Variation as it relates to Dunboyne is to address this excess and ensure that only that quantity of land required to meet the household allocation for the town will be released over the lifetime of the County Development Plan up to 2019. In such circumstances, there is no justification to zone any further lands for residential purposes as proposed in this submission.

The zoning of the lands west of the train station was changed to open space arising from the Strategic Flood Risk Assessment which identified these lands as being subject to flood risk. The submission has been referred to JBA Consulting, who prepared the Strategic Flood Risk Assessment and Management Study (SFRA) which informed this variation. JBA Consulting has noted that the lands are well within Flood Zone A and benefit from a flood defence scheme. The position of the "Planning System and Flood Risk Management Guidelines for Planning Authorities" is clear in this case and the impacts of any flood defences cannot be considered. The lands have been classified as being at risk of flooding under a study that was commissioned by Dublin City Council, in association with Fingal County Council, Meath County Council and the Office of Public Works (OPW). The quality of the Tolka River Flooding Study was considered appropriate for the design of the flood relief works and is similarly considered appropriate for the purposes of the SFRA. JBA Consulting have also highlighted that the lands to the east and north of the train station are outside of the settlement boundary and any further consideration of their use for residential development should adhere to the Sequential Approach and plan making Justification Test. Consideration of this nature has not been carried out in light of the reasons outlined in the preceding paragraph.

Recommendation

No change recommended.

SEA/AA Comment

No comment required.

10. Dunshaughlin Local Area Plan

Submission 1005	Michael	McKenna	Architectural	Services	on	behalf	of	Ken
	Leonard							

Summary of Main Issues Raised

This submission requests that a landholding in Dunshaughlin identified on a submitted site location map which has the benefit of B1 "Town Centre" & G1 "Community Infrastructure" land use zoning objectives, have the B1 land use zoning objective changed to an A1 "Existing Residential" land use zoning objective to allow access to the lands to the rear. It is submitted that the landowner intends to develop a small housing development in the future on the said lands.

Manager's Response

The Manager has reviewed the above request and considers that the existing B1 "Town Centre" land use zoning objective pertaining to part of the subject site is the most appropriate use having regard to the site context. A B1 "Town Centre" land use zoning objective seeks 'To protect, provide for and / or improve town and village centre facilities and uses'. The site identified in the submission is a narrow gap site which adjoins commercial properties on both sides. The gap site is effectively an entranceway leading into a greenfield backland area. The Manager is not of the opinion that the existing B1 land use zoning objective prevents the provision of a small scale housing development on such zoned lands. Residential housing is a permitted use in principle under the proposed land use zoning objective.

Recommendation

No change recommended.

SEA/AA Comment

No comment required.

Submission 1086 James Leonard on behalf of Castlethorn Construction

Summary of Main Issues Raised

The submission specifically relates to land in the ownership of Castlethorn Construction on the western edge of Dunshaughlin with a number of points raised which are summarised as follows:

1. <u>Inconsistency between labelling in the Evaluation Maps & Tables</u>

The submission points out that there is an apparent labelling inconsistently between the various sites put forward in the residential evaluation tables and maps. Reference is made to Site L in the evaluation tables however there is no Site L in the accompanying maps in Appendix II. The submission indicates that Site B as described in Table 14 should be omitted as it forms part of an extant permission. The submission goes into considerable description outlining the inaccuracies between sites labelling comparing the Tables & Maps in the draft Variation as it applies to Dunshaughlin.

2. Site Evaluation

The submission respectfully submits that Site C (as shown on the submitted map) is a more appropriate site for inclusion as Phase I lands than Site I or Site G having considered the following;

Proximity to the Town Centre;

It is submitted that each of Sites C, G & I are roughly equidistant in terms of walking distance from the true centre of Dunshaughlin which is considered in the submission as the junction of Main Street with The Gables where Supervalu, the only supermarket of significance in the town, is located. Pedestrian routes are plotted in a submitted map. It is submitted that these three sites warrant the same score with respect to this criteria i.e. a score of 3.

Proximity to Community Facilities, particularly Education;

Site C, situated adjacent to Dunshaughlin Community College, is conveniently accessible to this secondary school as well as the Gaelscoil on the Drumree Road, particularly where the planned Skane River walkway or indeed the existing Croppies Lane are utilised. These pedestrian routes can be delivered in association with the residential development of their lands.

Reference is also made to a large purpose planned community & sports centre adjacent to Dunshaughlin Community College which is available for dual use of the school and the local community. Site C is also located adjacent to the Dunshaughlin GAA sports grounds and there are additional open space/community zoned lands likely to facilitate an expansion of the secondary school to the west and also provide a significant landscaped public open space serving their residential sites. Site C is also situated very close to the planned Neighbourhood Centre accessed off the Dunshaughlin Link Road. It is put forward that Site C is exceptionally well served in terms of proximity to both educational and broader community facilities and would reasonably qualify for a score of 2 in this regard.

Access to Public Transport

The submission notes that this analysis is restricted to proximity to existing bus stops along the Old Navan Road R147 which accommodates Bus Éireann services. The submission indicates that there is potential for the provision of a bus stop along the Dunshaughlin Link Road as currently some Bus Éireann services use the M3 Motorway as an access route to and from Dunshaughlin.

It is also stated that the subject lands are conveniently located on the western part of Dunshaughlin being accessible to the planned location of a new railway station forming part of the Phase II Railway extension to Navan. The submission states that the Planning Authority should take the proximity of various sites to both existing and planned public transport corridors including the rail option planned for the town.

The submission also respectfully suggests that some regard should also be given under this heading to the immediate proximity of the Castlethorn landholding to the Dunshaughlin Link Road and M3 Motorway, which facilitates convenient car-borne access to the Pace Interchange and Dunboyne Railway Station which in turn provides a frequent and high quality rail service straight into Connolly Station and the Docklands Rail Station in the IFSC.

It is submitted having regard to the foregoing that Site C would warrant a reduced weighting of 4 or possibly even 3 with respect to consideration of the issue of public transport.

Requirement for New Roads

It is stated that the subject lands on the western edge of the town are directly served by the existing Dunshaughlin Link Road to the M3 Motorway which serves as the principal point of

arrival and departure to and from Dunshaughlin by car. With this in mind, the submission supports the low score of 1 afforded to Site C. In contrast the submission points out that all A2 "New Residential" zoned lands to the southeast, east and northeast either directly abut or are traversed by a planned major distributor road that loops all the way round to the south and southwest of Dunshaughlin to connect with the southern most roundabout of the Dunshaughlin Link Road and onto the M3 Motorway. It is respectfully requested that significant progress with respect to the development of these eastern lands should be tied to the advancement of this looped distributor road and that Sites G, I and L should each have scores of at least 3 in consideration of this issue. A further point is made in that the development of Castlethorn lands to the west of Dunshaughlin was considered premature for a long number of years by Meath County Council and An Bord Pleanála until such time as the Dunshaughlin Link Road was in place, notwithstanding the fact that their lands also have significant frontage onto the existing Drumree Road, a road of greater capacity and safer alignment than the Lagore Road for example.

Infill Opportunity

The submission indicates that there is no issue with the allocation of a high weighting against their sites with respect to consideration of whether the sites represent infill development opportunities. However it is pointed out that the sites are on the town side of the Dunshaughlin Link Road which forms an effective built edge to the west of the town. Site C should thus arguably quality for a weighting of 4 rather than 5 in this regard.

The submission does however take issue with Site I being given a reduced weighting of 3 despite it too representing an edge site from the outermost perimeter of zoned lands to the east of Dunshaughlin. Site I is situated beyond the 50km/h speed limit of the town. It is suggested that Site I be afforded a score of 5 for infill development.

Similarly, the allocation of Site G with a score of 3 in the infill opportunity category is questioned given the limited amount of development in the area adjacent onto the R147 (a development known as The Willows). It is suggested that a score of 4 for Site G is more appropriate in this regard and would note that it too is beyond the 50km/h speed limit of the town.

Having regard to the foregoing, the submission includes an alternative residential evaluation table with a scoring summary for Sites A, C, G and I. The table indicates that Site C would have the lowest score of those four evaluated sites and would qualify as the third site along with Site F and Site K as Phase I in the Order of Priority for Dunshaughlin during the life of the Meath County Development Plan 2013 – 2019.

The submission concludes by stating that the inclusion of Site C as a Phase I site considered in conjunction with Sites F and K would represent a more spatially balanced and equitable distribution of Phase I zoned lands around Dunshaughlin as well as acknowledging the increasing strategic significance of the western zoned lands given the infrastructural investment that has taken place (the new link road, M3 Motorway, and ultimately the planned investment of the Navan Railway extension Phase II).

Manager's Response

The Manager notes the content of this submission and will respond to the various items raised individually;

1) Inconsistency between labelling in the Evaluation Maps & Tables

Having reviewed the published draft Variation in relation to Dunshaughlin, it is noted that the submission (along with submission no. 1101) correctly highlights that there is a noted discrepancy between the evaluation tables (Table 14, 15 & 16) and the site evaluation maps. The Planning Authority regrets that this was not corrected prior to the publication of the draft

Variation and apologies for any confusion caused as a result. This discrepancy is accounted for by a reduction in the number of sites put through the residential evaluation tables due to An Bord Pleanála granting planning permission following an appeal for a significant residential development in the Castlethorn landholding in November, 2013. The planning permission was granted close to the date the draft Variation was published. Whilst the site labelling was reconfigured taking account of this new extant planning permission, it also resulted in a reduction in the number of sites put through the evaluation process from 12 no. to 11 no. sites. The residential evaluation maps which were published in the variation are correct; however the discrepancy arises with the resultant tables. It should be noted that the description of each site in the tables remains correct, however the site labelling in the tables resulted in inaccuracy due to the omission of a previous Site B (lands to the northeast of the Dunsany Road roundabout) which now benefits from an extant planning permission.

In the interests of clarity, it is suggested that an amendment to the draft Variation be published which will correctly describe each site in the tables and which corresponds with the residential evaluation maps.

The tables listed are the accurate labelling of each site which was evaluated as part of the proposed Variation.

Table 14: Description of individually zoned available sites evaluated

	Lane					
	Location	(hectares)				
Site A	Lands northwest of Dunsany Road roundabout	3.69 ha				
Site B	Lands to the east of the R125 Motorway Link Road	3.41 ha				
Site C	Lands to the east of the R125 Motorway Link Road roundabout	3.45 3.38 ha				
Site D	Lands at Mabestown west of Manor Court housing development	4.50 ha				
Site E	Lands south of Seachnall House adjoining the R147	3.14 ha				
Site F	Lands adjoining the R147 southeast of the town	8.64 9.61 ha (7.69 ha is A2)				
Site G	Lands west east of Dunshaughlin Business Park	<mark>7.64</mark> 9.24 ha (8.58 ha is A2/B1)				
Site H	Lands west east of Maelduin along the Lagore Road	3.87 ha				
Site I	Lands northeast of Lagore Crescent	0.86ha				
Site J	Lands East of St. Seachnalls Street	5.46 ha (4.76 ha is A2)				
Site K	Lands south of the R125 Ratoath Road	6.68 6.85 ha (6.62ha is A2)				

Table 15: Evaluation of individually zoned available sites for residential development

Cita Nama	Site	Site	Site	Site	Site	Site	Site	Site	Site	Site	Site
Site Name	Α	В	С	D	E	F	G	Н	- 1	J	K
Proximity to	5	4	4	3	3	4 3	3	3	3	2	3
Town centre	5	4	4	3	3	4 3	3	3	3		3
Proximity to	3	3	3	3	3	<mark>4</mark> 3	4 3	4	4	3	3
Education	3	3	3	3	3	- 3	 3	4	4	3	3
Served by											
Public	4	5	5	5	1	3 2	<mark>4</mark> 3	4	3	2	3
Transport	4	5	5	3		5 2	<u>∓</u> 3	4	3		3
Corridor											
New Roads	1	1	1	3	1	3	5	1	5	1	3
Required	'	'	'	3	'	3	3	'	3	'	3
Infill	5	5	5	5	5	3	5	3 5	5	3	5
Opportunity	5	3)))	3)	<mark>5</mark> 5)	3	5
Total	19 18	18	18	19	13	18 14	19	15 -17	20	11	17
Rank	9 6	6	6	9	2	6 3	9	3 4	11	1	5 4

Table 16: Yield and Rank of residential lands evaluated

Site Name	Zoning	Land Area	Density	Yield	Rank	Phase
Site J	A2 <mark>& F1</mark>	4.76ha	30	143	1	I
Site E	A2	3.14 ha	30	<mark>94</mark> 103	2	I
Site F*	A2 <mark>& F</mark>	8.64 7.69 ha	30	259 231	3	I
Site H	A2	3.87ha	30	116	4	П
Site K	A2 <mark>& F</mark>	6.68 6.62	30	199	4	П
		ha				
Site A	A2	3.69ha	30	111	6	П
Site B	A2	3.41ha	30	102	6	П
Site C	A2	3.45 3.38	30	101	6	П
		ha				
Site D	A2	4.50ha	30	135	9	П
Site G	A2/B1 B3,	7.64 8.58ha	30	257	9	П
	F1	7.07 0.3611a				
Site I	A2	0.86 ha	30	26	11	П

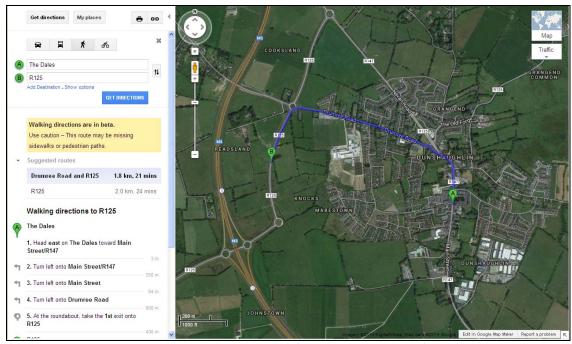
*Due to the overall land area of Site F, only 2.73ha of this site is within Phase I of the Order of Priority in order to comply with the household allocation of 319 units identified for Dunshaughlin in the Meath County Development Plan 2013 – 2019.

Following the carrying out of the residential evaluation, sites J, E and F scored the highest and have the potential to accommodate approximately 319 no. units on an assumed density of 30 - 35 units per hectare as provided for in Table 2.4 of the County Development Plan 2013 - 2019. Therefore these sites are prioritised for release during the lifetime of the Meath County Development Plan 2013-2019. All other lands with the benefit of a residential land use zoning objective are identified as Phase II (Post 2019) and are not intended for release within the life of this Development Plan.

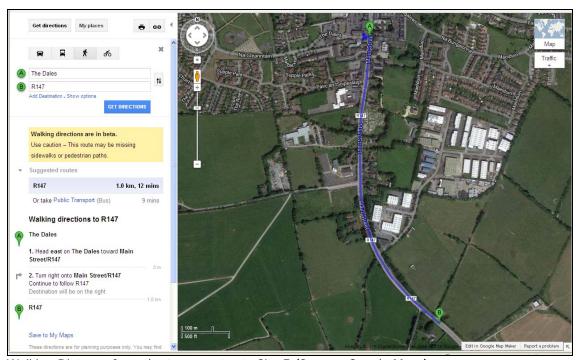
The remaining sites in the evaluation table are included in Phase II of the Order of Priority phasing programme and are not intended to be developed during the current Meath County Development Plan period 2013-2019.

2) Site Evaluation

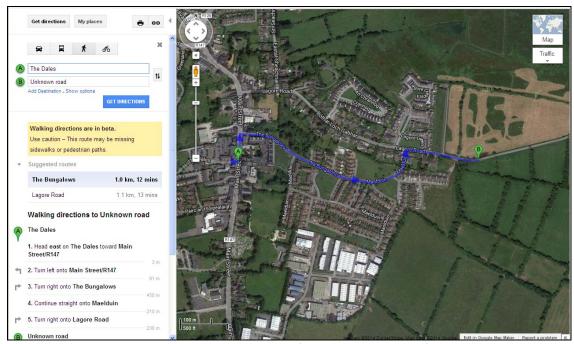
The Manager does not agree that Site B (identified as Site C in the maps included with the submission but now amended) is of equidistance in terms of walking distance to the town centre. Even with the town centre taken as suggested as the junction of Main Street and The Gables, both Site F and Site H are of closer walking distance to the town centre. Using the walking distance tool on Google maps, it is apparent that Site F and Site H are approximately 1km walking distance from the town centre (circa 12 minutes walking). Site B is measured at 1.8km from the town centre (or 21 minutes walking). The maps submitted with the submission show a walking trail to Site B through greenfield lands which is not satisfactory as no proper footpath infrastructure exists along much of this route shown. The Planning Authority, in measuring walking distances, has relied upon existing pedestrian/footpath routes only (see Google maps distances below). The Manager is of the opinion that the scoring of Site F & Site H at a lower score (3) than Site B (4) is the correct rating in this category and is evidence based. It is contended that other land owners could make similar arguments with respect to potential new routes which would result in a more favourable assessment for their sites against this criterion.



Walking Distance from the town centre to Site B (Source: Google Maps)



Walking Distance from the town centre to Site F (Source: Google Maps)



Walking Distance from the town centre to Site H (Source: Google Maps)

3) Proximity to Community Facilities, particularly Education

The proximity to education facilities criterion was assessed on the basis of the relative proximity of each site to the local national schools and to the Community Collage on the Drumree Road. Site B was allocated a score of 3 in this category due to its location between the 400m – 800m bands from its closest school (Dunshaughlin Community College). The Manager does not see sufficient justification in improving the score of Site B. Site F was also allocated a score of 3 in this category due to its proximity to St. Seachnall's national school (between 400m and 800m bands), whilst Site H was allocated a score of 4 due to its further relative distance from St. Seachnall's national school.

4) Access to Public Transport

The submission is correct in interpreting this criteria as proximity to existing bus stops in Dunshaughlin served by Bus Éireann (the only public bus transport company serving Dunshaughlin primarily with the 109/109A service). The criteria and ranking system are clearly explained in the Public Transport Site Evaluation Map. The Manager does not agree that Site B should be more favourably scored on this criterion, being a site on the western edge of Dunshaughlin and not on a frequently served public transport route, and at a significant distance to an existing public bus stop. Whilst the Manager notes the reference made to the planned railway station to serve Dunshaughlin located on the western part of the town as part of the Phase II Navan/Dublin rail extension, there is significant uncertainty as to when the rail extension will be delivered including a station at Dunshaughlin. For this reason, and given the timeframe of this County Development Plan to cover the period 2013 to 2019 it was not considered realistic to include proximity to rail as part of the residential site evaluation. The evaluation exercise also only took existing bus stops into account and not any speculative proposals as to whether new bus stops could be provided elsewhere in the town.

5) Requirement for New Roads

The submission agrees that Site B should retain a low score of 1 in relation to new roads required as the site adjoins the new Dunshaughlin Link Road to the M3 Motorway. However it is asserted that Sites G, I and L as identified in the submission map (labelled F, H and K in the draft

Variation maps) should at least score 3 in this category due to their location on the southeast, east and northeast of the town and that their development should be tied in to the delivery of a new looped distributor road planned for this side of Dunshaughlin linking the Dublin Road (R147) with the Ratoath (R125) and Red Bog roads.

Having reviewed the above, the Manager is not of the opinion that the ranking tables should be altered. Site F has a low score of 1 due to its location adjacent to the R147 where the initial phases of this site can be served off the existing road network in place. A score of 1 for Site F is considered appropriate. Similarly Site H has the benefit of existing road frontage onto the Lagore road, and Site K has road frontage onto the R125 Ratoath Road. The Manager does not consider that the above scorings require to be altered in this regard.

6) Infill Opportunity

The Manager notes the comments expressed in the submission in relation to infill opportunity. No issue is taken in relation to the high scoring for Castlethorn lands on the western edge of Dunshaughlin, however concern is expressed in relation to the medium scoring of 3 for Site I (Site H in the draft Variation maps). On reviewing the above, the Manager concurs with the submission in that Site H is a peripheral site on the eastern edge of Dunshaughlin which does not represent a clear infill opportunity. The scoring of Site H on this category shall therefore be altered to 5.

The submission also queries the scoring of Site G (Site F in the draft Variation maps) with a medium scoring of 3 given its location. A scoring of 4 is suggested in the submission. The Manager does not concur with the view expressed in the submission in relation to Site F as planning permission has been granted for a 254 no. unit housing development immediately east of Site F with a certain level of development having already been built. The expiration date of this adjacent extant planning permission runs to the year 2017. With this in mind, it is considered reasonable to consider that there are infill opportunities associated with Site F which warrants a scoring of 3.

Recommendation

The Manager recommends amendments to Tables 14, 15 and 16 in the Dunshaughlin Written Statement as follows in order to bring consistency with the residential evaluation tables and the site evaluation maps already published in the draft Variation.

Table 14: Description of individually zoned available sites evaluated

	Location	Land Area (ha)
Site A	Lands northwest of Dunsany Road roundabout	3.69 ha
Site B	Lands to the east of the R125 Motorway Link Road	3.41 ha
Site C	Lands to the east of the R125 Motorway Link Road roundabout	3.45 3.38 ha
Site D	Lands at Mabestown west of Manor Court housing development	4.50 ha
Site E	Lands south of Seachnall House adjoining the R147	3.14 ha
Site F	Lands adjoining the R147 southeast of the town	8.64 9.61 ha (7.69 ha is A2)
Site G	Lands west east of Dunshaughlin Business Park	<mark>7.64</mark> 9.24 ha (8.58 ha is A2/B1)
Site H	Lands west east of Maelduin along the Lagore Road	3.87 ha
Site I	Lands northeast of Lagore Crescent	0.86ha
Site J	Lands East of St. Seachnalls Street	5.46 ha (4.76 ha is A2)
Site K	Lands south of the R125 Ratoath Road	<mark>6.68</mark> 6.85 ha (6.62ha is A2)

Table 15: Evaluation of individually zoned available sites for residential development

Site Name	Site A	Site B	Site C	Site D	Site E	Site F	Site G	Site H	Site I	Site J	Site K
Proximity to Town centre	5	4	4	3	3	<mark>4</mark> 3	3	3	3	2	3
Proximity to Education	3	3	3	3	3	<mark>4</mark> 3	<mark>4</mark> - 3	4	4	3	3
Served by Public Transport Corridor	4	5	5	5	1	3 2	<mark>4</mark> 3	4	3	2	3
New Roads Required	1	1	1	3	1	3	5	1	5	1	3
Infill Opportunity	5	5	5	5	5	3	5	3 5	5	3	5
Total	19 18	18	18	19	13	18 14	19	15 -17	20	11	17
Rank	9 6	6	6	9	2	6 3	9	3 4	11	1	5 4

Table 16: Yield and Rank of residential lands evaluated

Site Name	Zoning	Land Area	Density	Yield	Rank	Phase
Site J	A2 <mark>& F1</mark>	4.76ha	30	143	1	I
Site E	A2	3.14 ha	30	<mark>94</mark> 103	2	I
Site F*	A2 <mark>& F</mark>	8.64 7.69 ha	30	259 231	3	I
Site H	A2	3.87ha	30	116	4	П
Site K	A2 <mark>& F</mark>	6.68 6.62	30	199	4	П
		ha				
Site A	A2	3.69ha	30	111	6	П
Site B	A2	3.41ha	30	102	6	П
Site C	A2	3.45 3.38	30	101	6	П
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Site D	A2	4.50ha	30	135	9	П
Site G	A2 /B1 B3,	7.64 8.58ha	30	257	9	П
Site I	A2	0.86 ha	30	26	11	П

^{*}Due to the overall land area of Site F, only 2.73ha of this site is within Phase I of the Order of Priority in order to comply with the household allocation of 319 units identified for Dunshaughlin in the Meath County Development Plan 2013 – 2019.

Following the evaluation, it was found that sites J, E and F scored the highest and have the potential to accommodate approximately 319 units on an assumed density of 30 - 35 units per hectare as provided for in Table 2.4 of the County Development Plan 2013 - 2019. Therefore these sites are prioritised for release during the lifetime of the Meath County Development Plan 2013-2019. All other lands with the benefit of a residential land use zoning objective are identified as Phase II (Post 2019) and are not intended for release within the life of this Development Plan.

The remaining sites in the evaluation table will be included in Phase II of the Order of Priority phasing programme and are not intended to be developed during the current Meath County Development Plan period 2013-2019.

In relation to Site F, part of these lands (2.73 hectare) is indicated to be in the Phase I Order of Priority. The site includes an area of F1 "Open Space" which will act as a green buffer area between the future residential area and the adjoining E2 "General Enterprise & Employment" zoned lands to the west. In addition, an area of 0.4 hectares dedicated to public open space within the residential scheme shall be provided reflecting the additional area of open space previously identified on the land use zoning objectives map. The precise layout and design of this open space shall be determined during the development management process. This area of dedicated open space shall be additional to the normal requirements as specified in the Development Management Guidelines contained in Volume I of the County Development Plan.

Include new objective for Dunshaughlin as follows:

LU OBJ 1	To provide a site of 0.4 hectares (1 acre) in extent for public open space
	on the lands identified with an A2 "New Residential" land use zoning
	objective immediately east of Dunshaughlin Business Park, which lands
	do not presently have the benefit of an extant planning permission. This
	shall be in addition to the provision of 15% of the overall site area for
	public open space as required pursuant to Section 11.2.2.2 Houses in
	Volume I of the County Development Plan.

SEA/AA Comment

Screened out; no comment required.

Submission 1101 John Downey on behalf of Aiden Murphy, Receiver to certain assets of John O'Meara (In Receivership)

Summary of Main Issues Raised

The submission relates to a 36.8 hectare (90.9 acre) of landholding currently in receivership on the south-eastern area of Dunshaughlin (formerly in the ownership of John O'Meara). The submission is comprehensive in terms of reference to current planning legislation applicable to Development Plan variations, the site location and description and the planning history relating to the lands. The submission also points out that there is an extant planning permission in place for 254 no. residential units in a joint 'Stanley & O'Meara' application with 50 no. of these units being located on the subject landholding of this submission. The subject lands were also partly located on Phase 1 Order of Priority lands in Variation No. 2 of the Meath County Development Plan 2007 – 2013. The submission further goes on to refer to the Dunshaughlin Local Area Plan 2009 – 2015 whereby the lands were zoned for a mixture of residential and employment purposes.

In relation to the draft Variation on public display the following points are made;

- Noted anomaly between the variation tables and the published maps in terms of site referencing.
- Planning permission has been granted for 254 no. residential units (Planning Register Ref. No. DA60537 refers) of which 50 no. of these units are to be located on the subject landholding. This was a joint planning application made with an adjacent landowner and as such the two landholdings should be considered in tandem regarding future development. An extension of duration of this planning permission has been granted up until October 2017. Accordingly, this submission is seeking the incorporation of part of the additional residential zoned lands within the overall landholding to be designated as Phase I residential lands.
- The submission draws attention to a currently active planning application pending a decision from An Bord Pleanála regarding the subject lands. The application seeks revisions to the development granted permission under planning register ref. no's. DA60537 and DA120619 for the temporary removal of a number of permitted units to accommodate a temporary access road onto the R147 and the construction of 30 no. residential units. Meath County Council refused the application (planning register ref. no. DA130840 refers) for 4 no. reasons relating to the distributor road and the prematurity of the application. The submission highlights that the subject lands are suitably zoned for residential development and the lands are shown to remain zoned for Phase I development in the draft Variation on display.
- The development of the subject lands in the near future would consolidate residential development within the area whilst also providing much needed family residential units currently in demand in the Greater Dublin Area. The prospective development of the subject lands in the near future would see the transformation of this underutilised site at a strategic, prominent location on the approach to Dunshaughlin town centre. The locational attributes of the subject site include:
 - within a short walking distance of Dunshaughlin town centre
 - within 100m of local employment centres such as Dunshaughlin Business Park/Industrial Estate.
 - Within 400m of St. Seachnall's National School.

- Within close proximity to the recreational amenities of Dunshaughlin.
- Well served by public transportation with the 109/109A Bus Route directly passing the lands on a frequent basis. The bus stop is within 400m of the subject lands.
- Located on the R147 road linking the site with the M3 Motorway for ease of access to the Greater Dublin Area.
- The submission also makes reference to the proposed Local Distributor Road which is required to be provided further to the southeast of the site as part of the permitted development. This road would link the R147 with the Lagore road. The submission acknowledges that the provision of such a road is an integral aspect of the overall vision of the subject lands and remains the intention of the landowners to comply with this objective. It is however stated that the vast financial implications for this road's construction warrants an initial procurement of permission for a quantum of development that provides justification to construct the road network. The submission states that it will be required to construct approximately 30 no. residential units initially in conjunction with subsequent phases of residential development (approximately 200 no. residential units) to assist in securing sufficient capital/investment to construct and complete this road. On this basis, the additional lands required to provide for these 200 no. units (i.e. the portion of units contained in the overall masterplan) should be made available for residential development within Phase I of the Order of Priority.
- It is also suggested that the proposed route of the Local Distributor Road should be realigned in order to ensure the proper planning and sustainable development of the area. It is stated that the current route traverses the lands designated for green open space and the lands that the landowners have designated for accommodating playing pitches for local clubs. As such the road only facilitates access points to the west and effectively land locks the subject lands for future development. The current route does not facilitate access points/road branches to the zoned lands to the east and as such restricts the long term sustainability of the route and long term vision for Dunshaughlin. To address this, the submission proposes a new route for the proposed Local Distributor Road through the centre of the residentially zoned land in the southeast part of the town. This makes all residential zoned lands available for development whilst also protecting the open space natural buffer to the east. Furthermore, the proposed realignment opens up industrial zoned lands to the southwest and facilitates an appropriate access to all the lands located to the east of the Dunshaughlin Business Park.
- In relation to the employment zoned lands within the landholding, the submission welcomes the Phase I Order of Priority designation in the draft Variation, and considers that such status warrants the need to consolidate the existing residential development on the lands by means of designating additional sections of the subject lands as Phase I in the Order of Priority.

Manager's Response

The Manager notes the comments raised in the submission. Due to the multiple topics raised in the submission, it is intended to reply to these individually below;

1) Noted anomaly between the residential evaluation tables and accompanying maps
This anomaly was already highlighted and dealt with in a previous submission (Submission No. 1086). Please refer to the Manager's Response to Submission No. 1086 for further details.

2) Recognition of Extant Planning Permission DA/60537

The Manager recognises that there is an extant planning permission in place for 254 no. residential units in a joint planning application by Stanley & O'Meara. This permission has

recently received an extension of duration up to October 2017. Those residential figures are inbuilt into the Core Strategy household allocation for Dunshaughlin whereby it is recognised that there are 784 no. units with extant planning permission in the town, with a further allocation of 319 no. units to be accommodated during the life of the current County Development Plan.

Any sites with an area greater than 0.5 hectare which were zoned for residential development but without the benefit of planning permission were subjected to a residential evaluation process against the following criteria;

- Proximity to the town centre;
- Proximity to education;
- Served by public transport corridor;
- New roads required, and;
- Infill opportunity.

The lands which ranked the lowest from an aggregate evaluation against these 5 no. criteria were considered most favourably. The subject lands in this submission relate to Sites F & G in the evaluation tables and maps. In the overall residential evaluation, Site F was ranked third behind Site J and Site E. Due to the significant site size of Site F, along with the yield already accounted for in Site J and Site E that scored better with an average density of 30 units/ha, only 2.73 ha of Site F is required in Phase I of the Order of Priority to accommodate the overall housing allocation. This is to ensure that the extent of lands identified for housing development in Dunshaughlin does not exceed the allocation provided for in the Meath County Development Plan 2013 – 2019 (319 no. new residential units).

The Manager considers that there is no evidence based planning justification provided for the inclusion of further lands within this landholding within the Phase I Order of Priority.

3) Reference to a current application with An Bord Pleanála seeking revisions to DA/60537 and DA120619 for a new temporary access road onto the R147 and the construction of 30 residential units.

The Manager notes that there is a current planning application on appeal with An Bord Pleanála which seeks revisions to planning permission planning register ref. no. DA60537 (which was extended in duration more recently by planning register ref. no. DA120619). This application was refused permission by Meath County Council in January 2014 and is currently with An Bord Pleanála following the making of a first party appeal (ref. PL 17.242958). The Manager considers that there is no planning justification for taking the above appeal into account as no planning permission for additional housing or a revision to the permitted scheme has been granted planning consent to date. In any case, the lands identified in the subject appeal site are mostly located inside the Phase I Order of Priority lands in the draft Variation.

4) Consolidate Residential Development in the Area

The Manager notes the points put forward in the submission regarding the locational advantages/attributes of the subject lands. The scoring of Site F and Site G in the evaluation tables is evidence based along with all other sites put through the residential evaluation process. The site was favourably considered from a sequential planning approach.

5) Local Distributor Road

The Manager notes the financial implications which will be incurred in the provision of the Local Distributor Road. The granting of planning permission for Phase I of a significant mixed use development under planning register ref. no. DA60537 (Extension of Duration planning register ref. no. DA120619) which includes a significant residential development of 254 no. units included

a condition that the developers construct a Main Distributor/Outer Relief Road as shown in the application drawings linking the Dublin Road with the Lagore Road. This planning permission was a joint application between the then Stanley and O'Meara landholdings with a legal agreement to be entered into by the developers with the Planning Authority for the delivery of this road prior to the commencement of development. The submission states that there are approximately 50 no. houses within this permission located within the subject landholding. The Manager does not agree with the opinion put forward in the submission that additional lands are required to be zoned and placed in Phase I of the Order of Priority to give sufficient financial support for the construction of this distributor road. It is considered that there are sufficient residential units permitted with the overall Phase I development to allow for the delivery of this road. The delivery of this road should be a co-ordinated development by the landowners in conjunction with the adjacent landholding.

6) Proposed Realignment of the Local Distributor Road

The Manager does not agree that a realignment is required or warranted for the proposed new Local Distributor Road. The case put forward in the submission to centre the alignment of the new distributor road approximately through a centre line between the former Stanley and O'Meara landholdings as lacking from a planning and strategic roads viewpoint. The overall development framework for Stanley & O'Meara lands was for a high quality, co-coordinated and phased mixed use scheme. The Council has concerns in permitting any deviation from this model whereby the landholdings are developed independent from each other. Indeed, the submission fails to acknowledge that the permitted scheme is presently under construction. To effect the suggested change is merely ignoring the plan led scheme which has been approved and revert to developer driver proposals on the basis of individual landholdings. The Manager considers that the subject landowner should re-engage with the adjacent landowner in order to put in place arrangements for the phased and permitted access arrangements to serve both landholdings. The proposed realignment of the local distributor road to a centre point within the overall scheme would not be desirable as this would involve strategic through traffic mixing with residential traffic within the heart of the overall development.

The Manager also notes that planning permission has recently been granted under planning reference DA130709 on the Stanley landholding to amend Condition No. 3 of planning register ref. no. DA60537 for a temporary new entrance arrangement to serve the first 87 no. houses (Phase 1) of the scheme permitted under the parent permission. This temporary access arrangement is limited to the first 87 no. houses and a condition is attached that no further residential units be occupied until such time that the remainder of the Local Distributor Road on the applicants lands has been constructed to the requisite standard.

The Manager is mindful of this recent grant of permission where flexibility has already been shown by the Planning Authority for the road access and layout arrangements of the initial phases of development within the overall scheme. The submitters are therefore advised to liaise with their adjacent landowners in terms of the overall access arrangements that can suit both landholdings during the initial phases of development.

7) Support for the Phase 1 Order of Priority Status for Employment Zoned Lands in the landholding.

The Manager notes the comments of support in the submission for the proposed phasing of employment zoned lands in Dunshaughlin. The Manager also respectfully points out that there is no link in the residential evaluation process between the phasing of employment zoned land in any settlement to the phasing of residential zoned land.

Recommendation

To amend Tables 14, 15 and 16 of the Dunshaughlin Written Statement in accordance with the recommendations previously outlined in response to Submission No. 1086 above.

SEA/AA Comment

Screened out; no comment required.

11. Ratoath Local Area Plan

Submission 1058 Rybo Partnership

Summary of Main Issues Raised

Submission received in relation to a site at Riverwalk Court, Ratoath. These lands are currently zoned G1 "Community Infrastructure" land use zoning objective which seeks to "provide for necessary community, social and educational facilities" in the Ratoath LAP (2009), and remain so within the proposed land use zoning map for Variation No. 2. It is requested that these lands are re-zoned to A2 "New Residential" land use zoning objective which seeks to provide for new residential development and to be included within Phase I of the Order of Priority.

The submitter has justified this alteration indicating that the residential zoning of lands has been carried out on a sequential basis. It is argued that these lands are sequentially more preferable than other lands proposed for Phase I within Ratoath. It is further argued that these lands are currently available for residential development. The landowner has also stressed within his submission that the site is located adjacent to town centre facilities and is readily accessible to vehicular traffic.

A portion of the site is located within the 1:1000 year flood zone, however it is submitted that any future development would be the subject of a detailed flood risk assessment.

The landowner has also stated that there are no financial impediments to the development of this site.

Manager's Response

The submitter's comments are duly noted. However, neither the background to these lands having been identified with a G1 "Community Infrastructure" land use zoning objective nor the subsequent planning history have not been outlined in the submission received. The lands were identified as part of a landscaped park in the layouts approved with the parent permission of the adjoining residential development; planning register ref. no. 01/673 refers. The area in question was identified to accommodate a crèche, active age day centre and scout den. The area was identified with an open space land use zoning objective in the 2001 County Development Plan. A subsequent planning application lodged (planning register ref. no. DA30196) seeking to construct a housing development on this area was refused. The site was then identified with a G1 "Community Infrastructure" land use zoning objective in the 2009 Ratoath LAP. It is respectfully considered that the zoning of the subject site is therefore appropriate.

The reconsideration or alteration of existing land use zoning objectives is not being considered under this proposed Variation with the exception of lands affected by flood risk as informed by the Strategic Flood Risk Assessment. In accordance with 'The Planning System and Flood Risk Management Guidelines for Local Authorities', lands which are at significant risk of flooding will require a land use zoning objective which provides for water compatible development or less vulnerable uses. As such a certain number of sites in various settlements across the county are

being changed from their current zoning objective which allows for vulnerable uses to F1 "Open Space".

It is not within the scope of this Variation to review the appropriateness of all existing zoning nor is it within the scope of this Variation to increase the amount of lands zoned for residential uses. The main purpose of Variation No. 2 is to address the overhang of residentially zoned lands which currently exists and bring the amount of residentially zoned land in line with that required to accommodate the household allocations set down in the Core Strategy of the County Development Plan 2013-2019. It is anticipated that a full review of all land use zoning objectives for Ratoath will most likely occur as part of the review of the County Development Plan 2013-2019 scheduled to occur in 2017 or as part of the review of the existing Ratoath Local Area Plan notwithstanding the incorporation of land use zoning objectives for this area into the County Development Plan. No decision has yet been taken by the Planning Authority in this regard. It is respectfully suggested that it would be at this full review stage that it would be advisable to make a submission regarding rezoning or new zoning in Ratoath. However, the significant planning history of the site will remain a valid consideration by this Authority at that juncture.

Recommendation

No change recommended

SEA/AA Comment

No comment required.

Submission 1069 Cllr Nick Killian

Summary of Main Issues Raised

The submission seeks the following amendments to the Ratoath land use zoning objectives map:

- 1. The land in the ownership of Meath County Council at St. Oliver's Park as outlined on Ratoath map is included within Phase I in order to construct Local Authority housing should capital funding become available.
- 2. The lands off the Glascarn Lane in the ownership of the Everard Family to the rear of Ratoath College be changed from amenity lands and revert to agricultural.
- 3. The restriction to develop lands post 2019 at the rear of Fox Lodge Manor is removed.

Manager's Response

The Manager welcomes the comments from Cllr. Killian with regard to the proposed variation and would respond to the 3 no. items as follows:

1. The phasing of residential lands is applicable to all lands which have the potential to yield residential development. Local Authority lands are not exempted from this process. To apply such an approach would undermine the overall evaluation process and consequent site selection. However, it is considered that the site is question which extends to 0.63 hectares approximates the 0.5 hectare threshold which determined whether or not sites should be brought through the Residential Evaluation. It is not considered that the inclusion of this marginal site is considered material having regard to the future population projections outlined in Table 2.4 of the County Development Plan 2013-2019. It is respectfully suggested that the proposed lands be identified as Phase I Residential.

2. The lands identified off the Glascarn Lane are currently identified with a G1 "Community Infrastructure" land use zoning objective which seeks 'To provide for necessary community, recreational and educational facilities'. These lands are subject to the following local objective:

SOC OBJ 4 To facilitate the Department of Education and Science on the provision of a primary school in the residential suburbs of Ratoath by making provision for such a site at Glascarn Lane adjacent to Ratoath College.

Having regard to the population projections and housing unit allocation for Ratoath and the age profile of the town, it is considered prudent to retain the current land use zoning objective to facilitate the future educational and community infrastructural needs of the town adjacent to the existing secondary school. This site is located at the centre of an existing residential area and directly adjacent to lands which currently have planning permission for in excess of 280 no. dwellings. The area is well served by public roads and is easily accessible by pedestrians and cyclists. There are no other such development sites as appropriately located as the site in question within Ratoath. No change was made to these lands as part of the proposed draft Variation.

The suitability of the subject lands along with all other lands will be considered under the review of the County Development Plan 2013-2019. It is not within the scope of this Variation to review the appropriateness of all existing zoning. The main purpose of Variation 2 is to address the over supply of residentially zoned lands which currently exists and bring the amount of residentially zoned land in line with the household allocations set down in the Core Strategy of the County Development Plan 2013-2019. As indicated in the previous response, it is anticipated that a full review of all land use zoning objectives for Ratoath will most likely occur as part of the review of the County Development Plan 2013-2019 scheduled to occur in 2017 or as part of the review of the existing Ratoath Local Area Plan notwithstanding the incorporation of land use zoning objectives for this area into the County Development Plan. No decision has yet been taken by the Planning Authority in this regard. It is respectfully suggested that it would be at this full review stage that it would be advisable to make a submission regarding rezoning or new zoning in Ratoath.

Consequently the Manager recommends the retention of this zoning objective as currently proposed.

3. The lands located adjacent to Fox Lodge Manor, have been selected for release post 2019 due to their scoring and ranking in the Residential Evaluation exercise. To select a site for release that has scored poorly from a sequential assessment without specific exception would create an undesirable precedent for all other settlements in the County and undermine the evidence based methodology used. Furthermore, the Council can only release the quantum of land required to accommodate the household allocation for Ratoath provided under the Core Strategy, Table 2.4 refers. There is no apparent consideration of the proposed inclusion of this site referred to in this submission regarding the overall household allocation for the town. It is respectfully considered that the current proposed phasing identified within the draft Variation remains unchanged.

Recommendation

- 1. To amend the Ratoath land use zoning objectives map by identifying the 0.63 hectare site which has the benefit of an A2 "New Residential" land use zoning objective adjoining St. Oliver's Park as Phase I Residential.
- 2. To remove Site I from the Residential Evaluation Map for Ratoath in Appendix V.

SEA/AA Comment

Screened out; no comment required.

Submission 1076 George Williams

Summary of Main Issues Raised

This submission has been made on behalf of the landowner of 5.66 hectares (14 acres) of land which is located on the periphery of the development boundary to the north of Ratoath between the R155 Regional Road and the Ballybin Road adjacent to the Fox Lodge Manor housing development.

The submitter has stated that these lands are located within 1km zone of Ratoath village centre. The lands are stated as being well serviced in terms of access, water, drainage and utilities. The topography of the land is relatively flat with a gentle slope from north to south with no significant changes in level. The site is considered by the landowner as ideal for future development linking through from the adjacent Fox Lodge Manor development.

Manager's Response

The Manager notes that the lands proposed by the submitter are currently unzoned. It is not within the scope of this Variation to increase the amount of lands zoned for residential uses. The main purpose of Variation 2 is to address the overhang of residentially zoned lands which currently exists across the majority of urban centres in the county and bring the amount of residentially zoned land in line with the household allocations set down in the Core Strategy of the County Development Plan 2013-2019. A full review of all land use zoning objectives for Ratoath will most likely occur as part of the review of the County Development Plan 2013-2019 scheduled to occur in 2017 or as part of the review of the existing Ratoath Local Area Plan notwithstanding the incorporation of land use zoning objectives for this area into the County Development Plan. No decision has yet been taken by the Planning Authority in this regard. It is respectfully suggested that it would be at this full review stage that it would be advisable to make a submission regarding rezoning or new zoning in Ratoath.

Recommendation

No change recommended.

SEA/AA Comment

No comment required.

Submission 1094 Luc Hemeryck

Summary of Main Issues Raised

It is submitted that a significant area of the landowners land has been zoned F1 'Open Space' from A2 'New Residential' and B3 'Local Neighbourhood Shopping Facilities'. In addition the 'A2' lands in the ownership of Luc Hemeryck have been further de-zoned to Phase II (Post 2019).

A2 Lands

It is stated that the 'A2' lands currently zoned in Ratoath Local Area Plan 2009 relate to the provision of the adjoining primary school on land owned by Luc Hemeryck that were previously zoned for residential development. The primary school and a considerable area of residential land in the Jamestown area have been developed in recent years. It is contended that the remaining lands associated with these developments should be 'A2' Phase I and the same quantum of 'A2' land be maintained.

B3 Lands

These lands have been substantially encroached on by a proposed F1 "Open Space" zoning objective. It is contended that this F1 strip be brought back more in line with the recent development pattern of nearby residential development.

Manager's Response

The Manager notes the points raised in this submission and would reply as follows:

'A2' Lands

The primary consideration used in the evaluation of residential lands in Ratoath was the application of the sequential approach from the centre outwards. The lands identified within the landowners ownership with an A2 "New Residential" land use zoning objective are partially located within the second 500 metre concentric circle extending from the centre of Ratoath i.e. between 500 m – 1 km from the centre whereas all lands included within Phase I are fully located within the initial 500 metre radius. The lands identified are therefore sequentially more preferable for development than that proposed. No argument has been proffered which would warrant a reversal of this conclusion. The submitter can include for residential development with the lands identified as B1 "Town Centre" land use zoning objective. The existing Ratoath LAP (page 21 refers) indicates that the "release of these lands for development shall be linked to the delivery of the proposed by-pass linking the R125 and the R155. The first phase of development on the B3 zoned lands shall include for the construction of the by-pass adjacent to these lands". It is clear therefore that the subject residential lands are landlocked until progress has been made in the delivery of the local distributor road to the east.

'B3' Lands

The existing lands within and adjacent to the development boundary of Ratoath have been subject to a Strategic Flood Risk Assessment undertaken by JBA Consulting. In accordance with 'The Planning System and Flood Risk Management Guidelines for Local Authorities' lands which are demonstrated as being at risk of flooding will require a land use zoning objective which ensures that no vulnerable land use is permissible within same. The northern portion of this site and the adjacent A2 "New Residential" zoned site are both located within Flood Zone A & B and as such are not suitable to accommodate vulnerable development such as residential or certain commercial uses. The area of land at risk of flooding has therefore been altered to water compatible use i.e. F1 "Open Space" land use zoning objective. The submitted is directed to the Strategic Flood Risk Assessment and recommendations contained therein in this regard. It was on this basis that the land use zoning objectives are proposed to be changed.

Having regard to the foregoing the Manager recommends no changes to the draft Variation on foot of this submission.

Recommendation

None recommended.

SEA/AA Comment

No comment required.

12. Southern Environs of Drogheda Local Area Plan

Submission 1052 Anthony Nulty

Summary of Main Issues Raised

The submission refers to lands along the Duleek/Platin Road. It requests that the zoning of the land is changed from industrial to residential use.

Manager's Response

The land in question consists of a residential property and its attendant grounds. The recognition of an established use through applying a relevant land use zoning objective is considered acceptable. In the interests of consistency, the residential property to the north of the site referred to in this submission should be similarly recognised.

Recommendation

It is recommended to change the zoning of two residential properties on the Platin Road from E2 "General Enterprise & Employment" / E3 "Warehousing & Distribution" to A1 "Existing Residential" land use zoning objective.

SEA/AA Comment

No comment required.

Submission 1063 Clyde Shanks on behalf of Soll Developments (ROI) Ltd

Summary of Main Issues Raised

The submission refers to lands to the north of Platin Terrace and west of Matthews Lane South in the Drogheda Environs. In the proposed variation, the lands are zoned for a mix of A1 "Existing Residential", A2 "New Residential" and F1 "Open Space" land use zoning objectives. The submission expresses support for the residential zoning objectives and for the inclusion of residential lands in Phase 1 release. However, it requests that the lands zoned for F1 "Open Space" revert back to the residential zoning shown on Map 5.3 associated with the Southern Environs of Drogheda Local Area Plan as adopted in 2009. It is suggested that it would be more appropriate for the design and location of open space and landscaping to be incorporated into the overall site layout of the subject lands through the Design Concept Statement which would accompany any future planning application for the site's development within the plan period

Manager's Response

The support for the residential zonings and phasing arrangements are noted. The mapping issue relating to the F1 "Open Space" land use zoning designation has been examined. It is accepted that there is an anomaly between the land use zoning objective shown for this area of land in the Southern Environs of Drogheda Local Area Plan as adopted in 2009 and the proposed variation. The former Plan illustrated the area with an A2 "New Residential" land use zoning objective, while the latter shows it as F1 "Open Space" land use zoning objective. The area of land does not correspond with any flood zone, as determined in the Flood Risk Assessment carried out to inform the proposed Variation. Therefore, in order to address the discrepancy, it is recommended that the land use zoning objective revert to A2 "New Residential".

Recommendation

It is recommended to change the zoning of lands in Phase 1 which are located west of Matthews Lane South and amount to 0.55 hectares, from F1 "Open Space" to A2 "New Residential" land use zoning objective.

SEA/AA Comment

Screened out; no comment required.

Submission 1070	Stephen Little & Associates on behalf of J Murphy Developments
	Ltd

Summary of Main Issues Raised

The submission relates to lands west of Colpe Cross which are zoned primarily for residential use and indicated as being within Phase II. It is primarily concerned with two issues: the identification of a neighbourhood centre on these lands and the Flood Risk Assessment carried out as part of the variation, which indicated that part of the lands were at risk of flooding.

It is contended that the Flood Risk Assessment has overestimated the extent of flooding likely to affect these lands and consequently an excessive amount of the lands were re-zoned for F1 "Open Space" land use zoning objective.

It is argued that the presence of a neighbourhood centre on these lands is unwarranted in light of the change of land use zoning objective from residential to open space, which reduces its immediate catchment area and taking into account the number of neighbourhood centres in the surrounding area.

Manager's Response

The submission has been referred to JBA Consulting, who prepared the Strategic Flood Risk Assessment and Management Study which informed this variation. They have noted that currently the Flood Zone mapping represents an adequate level of detail for the purposes of the Strategic Flood Risk Assessment (SFRA). However, it is clearly stated in Section 5.32 of the SFRA report that the publication of Eastern CFRAM flood mapping will trigger a review of the SFRA for Drogheda Southern Environs. It is considered that then would be the appropriate time to reexamine the extent of flood zones shown when this more detailed flood risk database has been published.

The primary purpose of this proposed Variation was to address the excess of residentially zoned land. In the context of the Southern Environs of Drogheda, other matters have also been dealt with where necessary, e.g. ensuring that adequate lands are available and readily accessible for community facilities and responding to the findings of the Strategic Flood Risk Assessment. It was not the intention to review the land use zoning objectives on a whole scale basis such as the need for neighbourhood centres. It is considered that this would be more effectively done through a review of the Local Area Plan or at a later stage when population trends can be examined to establish if there is a need for a neighbourhood centre in this area and if not, what other use is required and suitable, e.g. community facilities, recreational facilities or residential use. It is therefore not proposed to remove the neighbourhood centre designation at this time.

Recommendation

No change recommended.

SEA/AA Comment

No comment required.

Submission 1074 Brady Hughes Consulting on behalf of Shannon Homes

Summary of Main Issues Raised

The submission relates to lands in the Mill Road/Marsh Road area and comments on the residential evaluation carried out as part of the proposed variation and to the employment potential of lands in this area.

The comments on the residential land evaluation primarily concern sites 7 and 8. It is contended that the distance from these sites to West Street, the train station and bus station should be amended as per figures suggested in the submission. The scoring for the variables 'New Road Required', 'Natura 2000 Sites' and 'Infill Site' is also queried and revised scores are put forward. The effect would be to alter the ranking of the sites assessed, with sites 7 and 8 achieving a higher ranking than presented in the draft Variation. It is also suggested that 'Availability of Piped Services' should also be used as a criterion.

The submission states that the phasing proposals in the draft Variation should include a mechanism to allow for the development of other lands in the event that the land identified for release are not developed in a timely manner.

The second element of the submission relates to potential employment opportunities in this area. It is stated that Shannon Homes, on whose behalf the submission has been made, wish to develop a site for employment purposes which is presently zoned for "White Lands". These lands adjoin the railway line to the east, and are east of the Grange Rath housing development. To facilitate this, it is suggested that the proposed variation is amended as follows:

- To re-zone the lands from 'White Lands' to an employment use zoning objective; or,
- To designate the lands as being reserved as a strategic site for employment opportunities, which may be qualified as being subject to an evidence based demonstration that the development proposed was of a strategic nature and could deliver significant employment to the area; and,
- In addition to either of the options above, include a statement to the effect that there would not be unnecessary delays in granting planning permission on the lands.

Manager's Response

The Manager has considered the argument framed in the submission.

Residential Evaluation

The distances from Site 7 were measured from a point approximately mid way along the road frontage of the lands on Mill Road during the evaluation. However, the distances have been revisited using a starting point of approximately mid way through the lands using the new road which will connect to Marsh Road taking into account that this road is a requirement for the development of these lands, as suggested in the submission. This equates to a distance of 900 metres in addition to the distance from Marsh Road to the town centre and bus and train stations. However, the only distance that was reduced sufficiently such as to reduce the score was the distance to the train station; the score of which reduced from 5 to 3. The distances from Site 8 were measured from a point north of the lands along the Marsh Road which reflected the potential location of the intersection of the new road with the Marsh Road. In respect of Site 8, it should also be noted that the section of the variation discussing the residential land evaluation in the Southern Environs of Drogheda states:

"Distance to the town centre, bus station, and rail station and to schools (primary and post primary) was calculated on the basis of walking distance from the sites using Google

maps, with allowance made for distance from the particular site to the public road where necessary. The town centre was taken to be West Street." (p.390)

The allowance made for distance from the site to the public road was made for two sites: Site 4 and site 8, with an additional distance of 500 metres added to both to reflect the extent of the distance from the end of the sites to the public road. This sought to give a more accurate reflection of the average distance travelled by potential residents in the area.

The distance to the train station was measured to the car park in front of the station on the Dublin Road. It is accepted that a shorter distance would be available using the entrance on the Marsh Road for both sites 7 and 8. Therefore the table will be amended to reflect this. It should be noted that there is additional distance for transport users to travel on foot from this car park to the station in comparison to the entrance from the Dublin road therefore a further 150 metres has been added from the distance from the site to the car park entrance on the Marsh Road to reflect this. The distances from the town centre to the two sites have been checked and no difference in scoring was found.

Maps of the routes to the town centre, bus station and rail station (the distances which were queried) for all sites are attached in the Appendix to this report. A table has also been included at the end of this submission response as an Appendix detailing the distances as calculated from each of the sites to the relevant point and the resultant scoring.

The higher score for Site 8 in the category of Natura 2000 sites was owing to the proximity and linkages to Natura 2000 sites from those lands. In terms of the scoring for 'Infill', Sites 3 and 4 scored the same as Sites 7 and 8, reflecting the location of these sites at the edge of the town. Site 6 directly adjoins existing residential developments, could be accessed through these developments and as such was considered to have characteristics worthy of a higher score in this category. The argument that Sites 7 and 8 would represent completion of the overall urban pattern of Drogheda is not accepted. It could alternatively be argued that the railway line represents an appropriate demarcation and boundary for the urban area and the character of Marsh Road as one proceeds in an easterly direction from the aqueduct is not typically urban in form. This would suggest that Sites 7 and 8 could score lower than sites such as 3 and 4 which have no similar boundary or change in character on approach from the built up area of the town. However, given that the four sites abut the existing built up area to some degree, the same score was assigned to all.

The scoring for the sites for 'New Roads Required' has been re-reviewed. Site 4 benefits from existing road frontage, which could potentially be utilised although the link road from the R132 to the M1 would have to be delivered for the effective servicing of these lands. The site was therefore assigned a score of 3. The Mill Road is not considered adequate to cater for any increase in traffic that would be generated by the development of the zoned lands in the Mill Road/Marsh Road area including site 7. Therefore it is not considered appropriate to reduce the score assigned to it in this category. It is considered that the same issues are faced by Site 8, which is effectively landlocked. Therefore it is considered appropriate to increase the score of Site 8 to 4, consistent with Site 7.

The inclusion of a criterion of services was not considered appropriate given that all sites benefit from proximity to the sewer network in the Greater Drogheda Area.

The scoring table has been updated to take the above into account. The Meath County Council Executive Amendment outlines further changes which are necessary to the residentially zoned land evaluation to take account of a site where planning permission had lapsed and which now must be subject to the evaluation. This has also - the Manager's Report. A calculation error is

also corrected for Site 5, which should read as having a total of 12 points and not 11. The tables referred to in the text of the variation will need to be updated to reflect the revised rankings. These are also included at the end of this section of the Manager's Report.

However, it remains apparent that Site 5, followed by Site 1, 2 and 9 (new site) continue to score best against all of the selected criteria. All of the sites are considered peripheral to the town centre as one would expect for an environs area. Only Site 5 scored well against the proximity to public transport interchanges. The re-evaluation which has been undertaken has had an impact on the ranking of the individual sites and the sites being included for release as Phase I Residential coinciding with the life of the County Development Plan. These are outlined further in the section on the Meath County Council Executive Amendment.

Objective CS OBJ 9 in the Meath County Development Plan 2013-2019 requires that the two year progress report for the Development Plan should include details of the units permitted in the county in comparison with those allocated in the Core Strategy. This will allow Meath County Council to review the progress in achieving the household targets set out for each settlement. It is noteworthy that the sites which are indicated for release as part of Phase I Residential are the last remaining undeveloped and uncommitted sites (in the form of planning permission) of the sites first identified with a residential land use zoning objective in the 2001 County Development Plan. The Planning Authority shall closely monitor the level of activity which occurs over the next couple of years with a view to said lands being released or not for their intended purpose. It should also be noted that the household allocations detailed in Table 2.4 of the Core Strategy include headroom of 50%. Therefore, allowance has already been made for situations in which some lands may not come forward for release during the lifetime of the Development Plan.

Employment Lands

There are substantial lands zoned for industrial and employment uses in the Southern Environs of Drogheda at present. These amount to circa 137 hectares of which approximately 7.5 hectares have been developed to date. There remain, therefore, substantial lands to accommodate any development proposal.

The Council is aware that the E1 "Strategic Employment Zones (High Technology Uses)" land use zoning objective to the west of Drogheda Environs remains largely undeveloped and uncommitted to in the form of extant planning permission. The area which has been developed to date within the IDA Business Park houses one company International Fund Services (Ireland) Limited. It is considered that there is adequate space available to accommodate any Foreign Direct Investment companies which may seek to locate in Drogheda for the life of the County Development Plan and beyond. It is not considered appropriate or necessary to phase these lands.

The Council note the substantial area of land (52 hectares) identified for E2 "General Enterprise & Employment" land use zoning objective off the Duleek Road. To date, a car showroom which is presently vacant has been developed despite the lands having been first identified for employment use in the 2001 County Development Plan. Having regard to the extent of lands involved and the lack of activity to date to develop said lands for their intended land use and taking into account the level of infrastructure which would be required to service same(road and potentially new trunk foul sewer), it is considered more realistic to phase the release of these lands.

The existing lands identified in the Mill Road / Marsh Road area for employment uses is effectively landlocked with no obvious or immediate solution available to access same. In order to ensure that there is an adequate range of sites available in the short term to satisfy potential strategic investment and employment creation in Drogheda, the Council considers that there may

be merit in identifying a further site immediately adjoining the Grange Rath housing development for E1 "Strategic Employment Zones (High Technology Uses)" land use zoning objective. Accordingly, the Manager proposes to identify the existing lands identified in the Mill Road / Marsh Road Character Area with an E2 "General Enterprise & Employment" land use zoning objective as Phase II and to identify a commensurate area of land previously identified as "White Lands" with an E1 "Strategic Employment Zones (High Technology Uses)" land use zoning objective.

Recommendation

To amend the land use zoning objective map for Drogheda South Environs as follows

- 1. To identify lands off the Duleek Road as E2 "General Enterprise and Employment" Phase II
- 2. To identify lands within the Marsh Road / Mill Road which have the benefit of an E2 "General Enterprise and Employment" land use zoning objective as Phase II
- 3. To rezone 25 acres of land from WL "White Lands" to E1 "Strategic Employment Zones (High Technology Uses)" land use zoning objective on lands off the Donacarney Road / Mill Road.

See also Meath County Council Executive Amendment Overleaf

SEA/AA Comment

Environmental issues are adequately addressed through existing protective policies and objectives.

Appendix: Table demonstrating distances from residentially zoned sites to evaluation criteria

	Appendix : T	2	3	4	5	6	7	8	9
Site	Rathmullan Road	Platin Road	West Beamore Road	East of Beamore Road	South of Bryanstown Cross Route	West of Colpe/ Deepforde	Mill Road	Stagreenan/ Sth Marsh Road	West Rathmullan Rd
Distance Added from Road Frontage, where applicable				500m			900m (to Marsh Rd along new distributor road)	500m	
Proximity to Town Centre (West Street)	2.5	2.8	2.5	3	2	3.7	4	3.6	2.8
Proximity to Town Centre (West Street) Score	3	3	3	4	3	4	5	4	3
Proximity to Bus Station	2.6	2.3	2.5	3	1.9	3.8	4.1	3.7	2.9
Proximity to Bus Station Score	3	3	3	4	2	4	5	4	3
Proximity to Rail Station	3.5	3	2.4	2.9	1.3	2.6	2.95 (2.8 plus .15 to station)	2.55 (2.4 plus .15 to station)	3.8
Proximity to Rail Station Score	4	4	3	3	2	3	3	3	4
Proximity to Primary Education	1.2 Rathmullan	2.1 Rathmullan 2.1 Marymount Ballsgrove	1.7 St. Mary's Parish School	2.2 St. Mary's Parish School	0.5 St. Mary's Parish School	2.6 St. Mary's Parish	0.35 Gaelscoil	0.850 (Educate Together)	1.5 Rathmullan
Proximity to Primary Education Score	2	3	2	3	1	3	1	1	2
Proximity to Post Primary Education	0.5 St. Oliver's	2.2 (average distance to Sacred Heart & St. Mary's)	1.6 (average distance to Sacred Heart & St. Mary's)	2.1 (average distance to Sacred Heart & St. Mary's)	0.85 (average distance to Sacred Heart & St. Mary's)	3.3 (average distance to Sacred Heart & St. Mary's)	0.9 Grammar School	0.850 (Grammar)	0.8 St. Oliver's
Proximity to Post Primary Education Score	1	3	2	3	1	4	1	1	1

13. Meath County Council Executive Amendment

The Manager would refer to the specific wording contained in Objective CS OBJ 6 which states, inter alia:

"The inclusion of an Order of Priority for lands with a residential land use zoning objective pursuant to CS OBJ 2, 3, 4 & 8 shall include all lands which have the benefit of an extant planning permission for multiple unit residential developments as part of the lands identified for release within the life of this County Development Plan. For clarity, this shall apply to sites with extant planning permission from the date of publication of the relevant variation (CS OBJ 2, 3 & 4 refer) and publication of new draft Local Area Plan (CS OBJ 8 refers)."

Upon review of the Residential Evaluation for Drogheda Environs required pursuant to the previous submission, the Planning Department became aware that one of the sites which benefitted from a substantial extant planning permission had actually expired shortly before the draft Variation was published (planning register ref. no. SA60260 - Niall Mellon & Pat O'Reilly refers). This site is identified to the extreme west of the development envelop off the Rathmullan Road.

As this site had not the benefit of an extant planning permission at the date when the draft Variation was placed on display, it should have been subjected to the Residential Evaluation. As a result, the site has been added to the evaluation and is referred to as Site 9. The tables overleaf illustrate the update results of the evaluation.

List of Residentially Zoned Sites Subject to Evaluation for the Southern Environs of Drogheda

	Location	Zoning	Land Area (hectares)	Density	Yield
Site 1	Lands south of the Rathmullan Road	A2	11.88	35	416
Site 2	Lands on the Platin Road	A2	11.67	35	408
Site 3	Lands at Bryanstown, west of the Beamore Road	A2	14.1	43	606
Site 4	Lands at Bryanstown, east of the Beamore Road	A2	38.82	43	1,669
Site 5	Lands south of Bryanstown Cross Route	A2	3.77	40	151
Site 6	Lands west of Colpe Cross	A2	8.17	35	286
Site 7	Lands west of Mill Road	A2	28.72	43	1,235
Site 8	Lands south of Marsh Road	A2	22.42	43	964
Site 9	Lands at western end of Rathmullan Road	A2	20.61	35	721

Result of Updated Residential Land Evaluation in the Southern Environs of Drogheda

Site	1	2	3	4	5	6	7	8	9
Proximity to Town Centre (West Street) Score	3	3	3	4	3	4	5	4	3
Proximity to Bus Station Score	3	3	3	4	2	4	5	4	3
Proximity to Rail Station Score	4	4	3	3	2	3	3	3	4
Proximity to Primary Education Score	2	3	2	3	1	3	1	1	2
Proximity to Post Primary Education Score	1	3	2	3	1	4	1	1	1
New Roads Required	1	1	2	3	1	4	4	4	1
Infill Site	5	2	5	5	1	2	5	5	5
Natura 2000 Sites	3	3	3	3	1	3	3	5	3
Total Score	22	22	23	28	12	27	27	27	22
Rank	_ 2	_ 2	5	9	1	6	6	6	2

Site Name	Location	Yield	Rank	Phase
Site 5	Lands south of Bryanstown Cross Route	151	1st	I
Site 1	Lands south of the Rathmullan Road	416	Joint 2nd	l*
Site 2	Lands on the Platin Road	408	Joint 2nd	I *
Site 9	Lands at western end of Rathmullan Road	721	Joint 2nd	l*
Site 3	Lands at Bryanstown, west of the Beamore Road	606	5th	П
Site 6	Lands west of Colpe Cross	286	Joint 6th	П
Site 7	Lands west of Mill Road	1,235	Joint 6th	П
Site 8	Lands south of Marsh Road	964	Joint 6th	П
Site 4	Lands at Bryanstown, east of the Beamore Road	1,669	9th	П
Total		6,456		

Site 5 remains the highest ranking site. Three sites are in joint 2nd place – sites 1, 2 and 9. Site 5 is therefore included in Phase I in its entirety. Parts of sites 1, 2 and 9 are also included in Phase 1 with an equal distribution of land between the 3 sites, i.e. 6.7 hectares.

Recommendation for Amendment to Variation

It is recommended to replace Tables 6, 7 and 8 and make associated changes to the text in the Section 2.0 Residential Land Evaluation for the Southern of Environs of Drogheda as follows (red font indicates proposed new text while text to be deleted is shown as strikethrough):

Table 6: Residential Sites for Evaluation in the Southern Environs of Drogheda

	Location	Land Area (hectares)
Site 1	Lands south of the Rathmullan Road	11.88
Site 2	Lands on the Platin Road	11.67
Site 3	Lands at Bryanstown, west of the Beamore Road	14.1
Site 4	Lands at Bryanstown, east of the Beamore Road	38.82
Site 5	Lands south of Bryanstown Cross Route	3.77
Site 6	Lands west of Colpe Cross	8.17
Site 7	Lands west of Mill Road	28.72
Site 8	Lands south of Marsh Road	22.42
Site 9	Lands at western end of Rathmullan Road	20.61

Tables 7 and 8 detail the outcome of the residential land evaluation. They show that Sites 5 south of the Bryanstown Cross Route), 1 (Rathmullan Road), and 2 (Platin Road) and site 9 scored the highest. Sites 5 and 1 and part of sites 1, 2 and 9 will be prioritised for release in Phase 1, during the lifetime of the Meath County Development Plan 2013-2019. Part of site 2, amounting to 4.5 hectares is included in Phase 1. Any application for development on sites 1, 2 and 9 these lands should illustrate an overall layout for the site in order to provide for an integrated development of these lands. Meath County Council will monitor the uptake of lands in Phase 1, particularly site 5, which is currently in use as a playing field. The remainder of Site 2 will be prioritised should further lands be required for release in order to achieve the household target. The phasing indicated in the land use zoning objectives map gives effect to this assessment. All other lands are indicated as being in Phase 2. The timeline for the release, if appropriate, of these lands will be considered post 2019 in accordance with the relevant Meath County Development Plan in place at that time.

Table 7: Outcome of Residential Land Evaluation

Site	1	2	3	4	5	6	7	8	9
Proximity to Town Centre (West Street) Score	3	3	3	4	3	4	5	4	3
Proximity to Bus Station Score	3	3	3	4	2	4	5	4	3
Proximity to Rail Station Score	4	4	3	3	2	3	5 3	3	4
Proximity to Primary Education Score	2	3	2	3	1	3	1	1	2
Proximity to Post Primary Education Score	1	3	2	3	1	4	1	1	1
New Roads Required	1	1	2	3	1	4	4	4	1
Infill Site	1 5	2	5	5	1	2	5	5	5
Natura 2000 Sites	3	3	3	3	1	3	3	5	3
Total Score	18 22	22	23	28	11 12	27	27 29	27	22
Rank	2	2	5	9	1	6	6	6	2

The potential yield set down below in table 8 is based on the densities set out. They were determined taking into account the site location, the Meath County Development Plan 2013-2019 (Table 2.4) and Government policy. Each application for residential development will however be assessed on its own merits through the development management process. The total yield accruing from the sites in Phase I ranked numbered 1-3 inclusive is 865 856 no. units and the total area of available land is 23.9 24 hectares.

Table 8: Residential Land Phasing

Site	Zoning	Land Area (ha)	Density	Yield	New Rank	Phase
Site 5	A2	3.77	40	151	1st	I
Site 1	A2	11.88	35	416	2 nd Joint 2nd	I* (6.7ha/235 units)
Site 2	A2	11.67	35	408	3 rd - Joint 2nd	I (Partial) * (6.7ha/235 units)
Site 9	A2	20.61	35	721	Joint 2nd	I* (6.7ha/235 units)
Site 3	A2	14.1	43	606	4 th 5th	II
Site 6	A2	8.17	35	286	5 th Joint 6th	II
Site 7	A2	28.72	43	1,235	6 th Joint 6th	П
Site 8	A2	22.42	43	964	7 th Joint 6th	II
Site 4	A2	38.82	43	1,669	용 th 9th	II

Mapping Changes

1. The land use zoning objectives map for Drogheda Environs will be amended to remove the red boundary from Site No. 9 which indicated an extant permission.

- 2. Lands amounting to 6.7 hectares in Sites 1, 2 and 9 (as per the Residential Evaluation) shall be shown as Phase I with the remainder of the lands in these sites demarcated as Phase II.
- 3. The map of the Drogheda Environs illustrating the Residential Evaluation sites which is included in Appendix II to the variation shall be amended to illustrate lands at the western end of the Rathmullan Road as Site 9.

SEA/AA Comment

Screened out; no comment required.

Manager's Report - Proposed Variation No. 2 of the Meath County Development Plan 2013-2019



