

Chief Executive's Report

Pursuant to a Notice of Intent to issue a Ministerial Direction
Variation No 3, Meath County Development Plan, 2013-2019
Dunboyne North, Co Meath



August 2016



comhairle chontae na mí
meath county council

Proximal Location

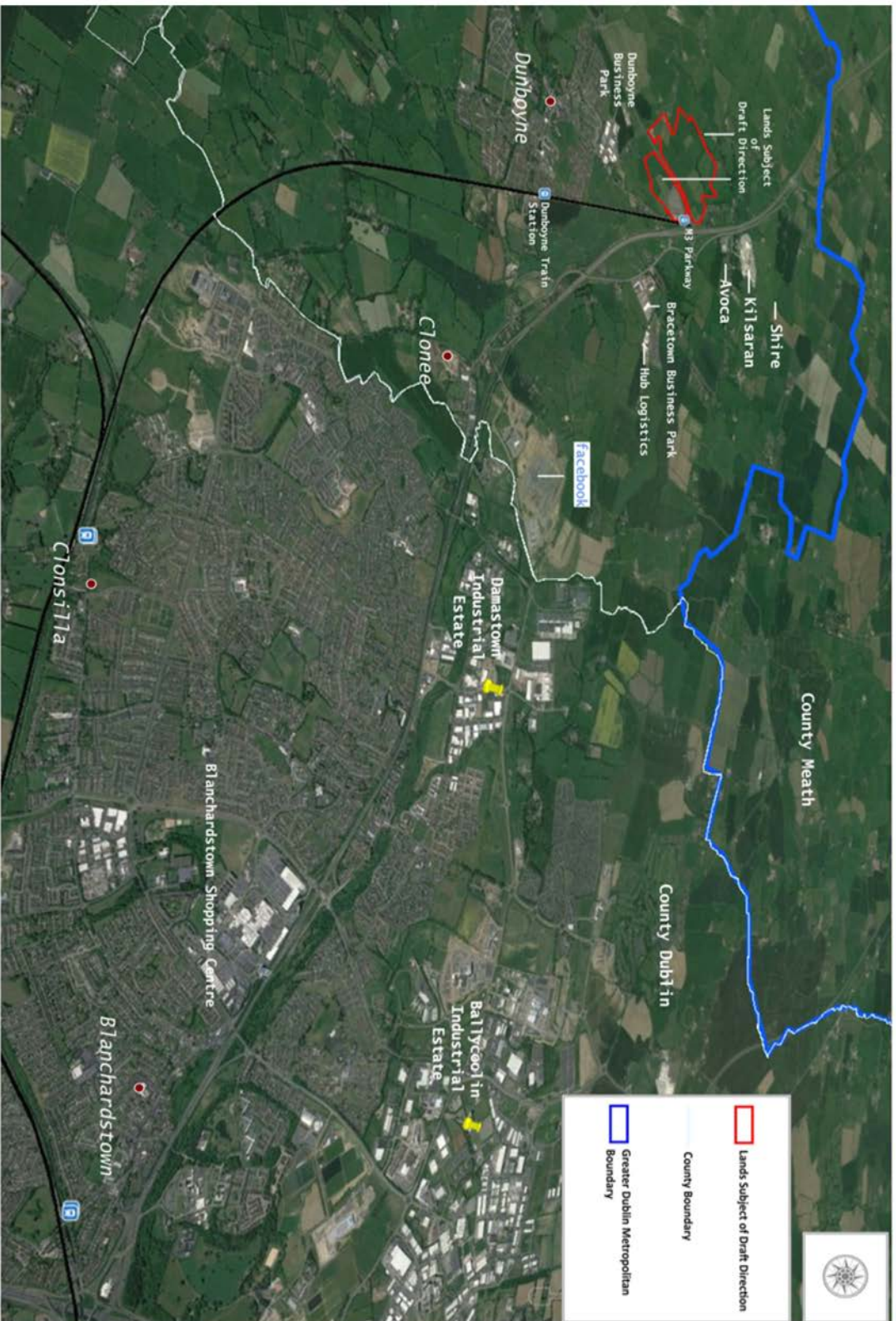


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Foreword:

A Draft Direction was issued by the Minister for the Environment, Community and Local Government on 17th day of June 2016 which effectively states that Meath County Council has failed to take sufficient account of submissions made by the Minister by the establishment of a 'Live Work Community' at lands at Dunboyne North/Pace.

On the 23rd May 2016, the Elected Members of Meath County Council varied the Meath County Development Plan 2013-2019, this variation is titled Variation No 3. The purpose of Variation No. 3 was to align the County Development Plan 2013-2019 with the key tenets of the Meath Economic Strategy 2014-2022. The Strategy was supported by the Elected Members of the Council, the Planning and Enterprise Strategic Policy Committee and the Meath Economic Forum (established in 2014).

There are 3 critical stages fundamental to the successful delivery of this project culminating with Variation No.3 the subject matter of the Draft Direction.

These include;

1. Baseline Study prepared by Maynooth University, completed in 2013
2. The Economic Development Strategy for County Meath, completed in 2014 which contains the following elements:
 - Economic Action Plan
 - Spatial Implementation Plan
 - Marketing Plan
3. Integration of the Economic Strategy by variation of the County Development Plan, Local Area Plans, etc...which is ongoing.

Variation No.3 is based on independent, rigorous, transparent, evidence based research and expertise from nationally known Planning, Economic and Marketing Consultants. PMCA Consultants (Economist), John Spain and Associates (Town Planning) and Jim Devlin of FTI Consultants (Marketing) were retained by the Council to prepare the Economic Strategy and the Spatial Implementation Plan.

The Dunboyne Corridor is situated within the Dublin Metropolitan Area; it is the only settlement in Meath within the Metropolitan Area of the Greater Dublin Area- The National Gateway. It is designated within the Regional Planning Guidelines for the Greater Dublin Area 2010 - 2022, as a Large Growth Town II and a Secondary Economic Growth Town within the Metropolitan Area. A

Large Growth Town II is described as *'strong active growth towns, economically vibrant with high quality transport links to larger towns/city'* of up to 30,000 persons.

Structure of Report

Section 1 Overview of National, Regional and Local Planning Policy

This section provides the National, Regional and Local planning context for Variation 3 of the Meath County Development Plan, 2013-2019.

Section 2 Public Consultation Process

This section sets out the Statutory process to date and includes a summary of submissions received as a result of the public display of the Draft Direction.

Section 3 Response and Recommendation of Chief Executive

This section sets out the response and recommendation of the Chief Executive to the contents of the Draft Direction.

SECTION 1

OVERVIEW OF NATIONAL, REGIONAL AND LOCAL PLANNING POLICY

1.1 Introduction

This section provides an overview and analysis of planning and economic policy documents from the National, Regional and Local planning policy perspective and how these key documents influence the planning and development context of the lands the subject matter of the Draft Direction.

<p>National</p>	<p>National Planning Framework</p> <p>National Spatial Strategy, 2002-2020</p> <p>Rebuilding Ireland – Action Plan for Housing and Homelessness, 2016</p> <p>IDA Ireland Winning: Foreign Direct Investment, 2015 – 2019.</p> <p>Action Plan for Jobs, 2016</p>
<p>Regional</p>	<p>Regional Planning Guidelines, 2010-2022</p> <p>Retail Strategy for the Greater Dublin Area, 2008-2028</p> <p>Transport Strategy for the Greater Dublin Area, 2016-2035</p> <p>Regional Spatial and Economic Strategy</p>
<p>Local</p>	<p>Meath County Development Plan, 2013-2019 incorporating Variations 1-3</p> <p>Dunboyne Clonee Pace Local Area Plan, 2009-2015</p> <p>Dunboyne Clonee Corridor Strategic Framework Guidance, 2015</p> <p>Economic Development Strategy for County Meath, 2014-2022</p> <p>Local Economic and Community Plan, 2016-2021</p>

1.2 National Planning Context

1.2.1 National Planning Framework

The National Planning Framework (NPF) will be developed to provide the context for national spatial planning for the next decade and beyond. This will involve reshaping and focusing the existing National Spatial Strategy (NSS) to meet future challenges. The new framework will:

- Identify national priorities with regard to future employment growth and development;
- Distinguish between the role of the larger cities in acting as our major international players and our regional towns in extending the influence of the cities;
- Establish a clear policy framework within which there will be more dynamic participation by rural areas in overall regional development by re-emphasising the contribution from rural based enterprise in food, tourism, natural resource and innovation sectors.
- NPF will have a statutory basis.

This new framework will provide the strategic context for, amongst other matters:

- Investment in critical national infrastructure by both the public and private sectors in key areas like housing, transport, energy, water services, communications and waste management;
- Planning at regional and local levels for Ireland's requirements in relation to housing, commercial, office and industrial accommodation;
- Preparation of new Regional Economic and Spatial Strategies (RSESs) by the three new Regional Assemblies and the associated enhancement of the economic development focus of local authorities as provided for under the Local Government Reform Act 2014.

As part of the reform of local government as set out in "Putting People First" (published in 2012), the Local Government Reform Act 2014 provided for the existing 8 regional authorities and 2 regional assemblies to be replaced by 3 new regional assemblies which were established with effect from 1 January 2015. It is envisaged that the NPF will be completed in 2017.

1.2.2 National Spatial Strategy, 2002-2020

The National Spatial Strategy (NSS) remains in place until its replacement by the National Planning Framework (NPF). The NSS is a twenty year planning framework designed to achieve a better balance of social, economic, physical development and population growth between regions. Its focus is on people, places and building communities.

Section 2.2 of the NSS discusses key development trends within Ireland. The NSS acknowledges that

'the Greater Dublin Area (GDA) has experienced rapid development, which has driven much of the country's economic success in recent years and delivered vital national benefits.'¹

¹ Emphasis added by underlining throughout

The strategy goes on to say that:

'The performance of the GDA is pivotal to the overall economic well-being of Ireland. Looking at the value of the goods and services produced in terms of the economic indicator known as Gross Value Added (GVA)⁵, Dublin City and the surrounding three Dublin counties accounted for 38.9% of the national total in 1999. Combining the total for Dublin with Meath, Kildare and Wicklow, the GVA of the Greater Dublin Area represented 47.9% of the national total in 1999.'

The NSS research indicates that some of the consequences of established unsustainable trends could become even more significant, in light of a number of projections including:

'In relative terms, use of sustainable transport modes like walking, cycling and public transport is falling and could continue to fall.'

The NSS goes on to state:

'A substantial amount of new house building is taking place outside urban areas. In many cases this tends to place greater distance between people and their work, increases dependence on the car, limits the effectiveness of public investment in providing utilities and services and threatens the quality of the rural environment in some areas.'

Section 3.7.1 acknowledges the central connectivity between land use and efficient transport modalities by stating that:

'Decisions on land use and development must take account of the existing public transport networks or support the emergence and development of new or augmented networks.'

1.2.3 Rebuilding Ireland – Action Plan for Housing and Homelessness, July 2016

The Action Plan for Housing and Homelessness is an “All of Government” Plan which seeks to achieve the Government goals of increasing the delivery of social housing, private housing construction and improving the rental market.

In the overview of the Action Plan it is acknowledged that:

'Our economy has recovered quickly and increasing population and employment mean that a significant increase in new homes is needed for a growing and working economy, and to address the significant level of social housing need.'

A core objective of the Plan is:

'Ensuring housing's contribution to the national economy is steady and supportive of sustainable economic growth.'

The Action Plan when addressing Location and Land Supply states that:

'In addition to the scale of housing provision, the delivery of housing in the right place is also central to enabling a good standard of living and improving quality of life. Locating housing in the right place provides the opportunity for wider family and social networks to thrive, maximises access to employment opportunities and to services such as education, public transport, health and amenities, while also delivering on sustainability objectives related to efficiency in service delivery and investment provision.

1.2.4 IDA Ireland Winning: Foreign Direct Investment, 2015 – 2019

IDA Ireland's strategy, Winning: Foreign Direct Investment 2015-2019 aims to increase Foreign Direct Investment (FDI). Regional development is a major component of IDA Ireland's new corporate strategy. In their strategy, IDA Ireland emphasised that,

'There is an increasing trend of FDI locating in larger urban areas. Dublin is an international-scale city and, as such, has a key role in attracting investment. Ireland has a large number of attractive cities and towns that have a proven ability to attract FDI. These urban centres will play an important part in attracting FDI to all regions.'

IDA Ireland is targeting a minimum increase in investment of 30% to 40% in each region outside Dublin, with Dublin continuing to attract similar high investment levels as before. As noted in their strategy document,

'Dublin & the Mid-East (Kildare, Meath and Wicklow) have benefitted from a high concentration of FDI. Dublin, as the capital city and the main population centre in Ireland acts as a major attractor of FDI for Ireland and its regions.'

IDA's FDI Strategy highlights the economic opportunities available in the Great Dublin Area:

'Dublin and its hinterland is also home to arguably the strongest technology cluster in Europe. IDA will strive to achieve the same high level of investment into Dublin over the lifetime of the new strategy. IDA will aim to increase investment into the Mid-East by 30% to 40% in line with other regions.

1.2.5 Action Plan for Jobs, 2016

The aim of the governments Action Plan for Jobs is to support enterprise growth and job creation in every region of the country where their focus is now on "Ireland's transformation from an economy recovering from the most severe recession to a competitive, innovative, highly productive, and environmentally sustainable economy providing sustainable full employment for its people". Action Plan for Jobs 2016 marks the transition to the implementation of key Government policies that plan for medium term growth. This plan is an integrated whole of Government commitment to job

creation with actions across all Government Departments to ensure that more employment opportunities are available to those who are seeking work.

In 2015 a new approach to upgrading the attractiveness and competitiveness of all our regions was seen through the development of Regional Action Plans for Jobs. Within these plans the government

'want each region to achieve its economic potential and raise employment levels in each of the regions through the implementation of the Regional Action Plans for Jobs. Our goal is to have a further 10 to 15 per cent at work in each region by 2020 and to ensure the unemployment rate is within one per cent of the State average.'

1.3 Regional Planning Perspective

1.3.1 Regional Planning Guidelines, 2010 – 2022 (RPGs)

The Regional Planning Guidelines for the Greater Dublin Area stipulates that Dunboyne, along with Newbridge, Greystones, Arklow, Cherrywood, Balbriggan, Maynooth, Leixlip are designated Large Growth Towns II in the Settlement Hierarchy of the Region. This category of settlements are smaller in scale than those towns designated as Large Growth Town and are described as strong active growth towns, economically vibrant with high quality transport links to larger towns/city.

The RPGs outlines its requirements for inclusion in Development Plans/Core Strategies with respect to Meath and states as follows:

'The key foci for the county over the lifetime of these guidelines will be to utilise the recent investments in transport and related infrastructure as a basis for sustainable development and to encourage investment in community, recreational, commercial and economic development to support the population of the county. In particular, opportunities to focus growth in association with the construction of the rail line to Dunboyne will allow for a sustainable pattern of housing development and other key related services in social, retail, employment and community in the existing metropolitan area.'

The RPGs go on to state that towns within the Metropolitan Area, including Dunboyne, should make maximum benefit of existing assets e.g. public transport, social and infrastructural utilities. This may include expansion of the built footprint of a settlement, where this is in tandem with the development of planned, high quality heavy or light rail based public transport projects. The process should be plan-led by the prior delivery of high standard and integrated local area plans or Strategic Development Zones, where new housing and public transport and other services are delivered in tandem.

The RPGs at Section 3.7.5 state that:

'Dunboyne, a large growth town II in the metropolitan area, has yet to realise its long term potential but plays an important role in this economic growth area given its status and

location on a developing rail line. It is also located strategically on the edge of the Gateway Core in an area with a high FDI presence.

It further states that:

'this economic growth area experiences high levels of outward commuting patterns to the Dublin area, and it is important that economic stimuli measures are underpinned by necessary infrastructure investment, particularly in relation to water and waste water services.'

1.3.2 Retail Strategy for the Greater Dublin Area, 2008-2028

The Strategy aims to set out a co-ordinated, sustainable approach to the assessment and provision of retail within the GDA so that:

- Adequate and suitable provision is made to meet the needs of the growing and changing population, both overall and locally, and provide for healthy competition and consumer choice,
- Retail in suitable locations is provided, integrated within existing growth areas and public transport investment, and
- Significant overprovision, which would place more marginal locations under severe pressure and undermine sustainability driven policies aimed at revitalising town centres is avoided.

Section 6.33 outlines specific policy recommendations which include:

'To provide for the future development of Dunboyne from Level 3 to a Level 2 centre over a 15-20 year time frame alongside the development of the rail line and associated future population growth, with this growth guided by the Integrated Framework Plan for Land use and Transportation Plan and the Local Area Plan for Dunboyne.'

1.3.3 Transport Strategy for the Greater Dublin Area, 2016-2035

In setting out its purpose and rationale, the document outlines a number of core principles from the strategic vision, which include:

- *'The Dublin and Mid-East Regions will be attractive, vibrant locations for industry, commerce, recreation and tourism and will be a major focus for economic growth*
- *Development in the GDA shall be directly related to investment in integrated high quality public transport services and focused on compact urban form.*

The Strategy sets out patterns and trends by individual transport corridors. In respect of Corridor B Navan- Dunboyne- Blanchardstown – to Dublin City Centre, it states as follows:

- *'The corridors largest urban settlements (Blanchardstown and Navan) are projected to grow significantly up to 2035.*
- *In relation to radial city centre bound trips, the southern part of Blanchardstown is currently served by the Maynooth Rail Line and a number of radial bus services. Dunboyne and the*

Hinterland Area beyond it are served by commuter rail services from the M3 Parkway and Dunboyne Rail stations and a number of longer distance commuter bus services.'

Chapter 7 sets out land use integration and behavioural change measures and outlines a number of strategic planning principles including:

- 'Residential development located proximate to high capacity public transport should be prioritised over development in less accessible locations in the GDA.'
- To the extent where practicable, residential development should be carried out sequentially, whereby lands which are, or will be, most accessible by walking, cycling and public transport- including infill and Brownfield sites- are prioritised.'

The application of local planning principles include the requirement that:

'areas around transport interchanges would also be desirable for some large scale development, for the period of the strategy. The Authority's interaction with the regional and strategy planning process in the GDA will be governed by these principles.'

1.3.4 Mid East Region Action Plan for Jobs, 2016-2017

Since the Action Plan for Jobs process commenced in 2012 individual action plans have been developed for each region. The Action Plan for Jobs for the Mid East Region was launched in January 2016 and covers Counties Meath, Kildare and Wicklow. The Action Plan, (Page 31) refers to the Economic Development Strategy for County Meath and outlines that the strategy is based on three pillars which are: economics, spatial planning and marketing. Key outputs from the strategy are also listed as follows:

- *'An evidence based economic vision for the County;*
- *A roadmap identifying sectoral opportunities for economic and employment growth;*
- *Key recommendations to enable the county to realise its economic potential;*
- *The integration of these recommendations with land use planning proposals*
- *A marketing plan with key messages to support the strategy;*
- *An action plan to implement the key recommendations and bring the vision to life.'*

1.3.5 Regional Spatial and Economic Strategy

Each Regional Assembly is required to prepare a Regional Spatial and Economic Strategy (RSES) in tandem with the preparation of the National Planning Framework (NPF). The RSES provides a long term (6 year) strategic planning and economic framework for the region to support the implementation of the NPF and the economic policies and objectives of the Government.

A number of factors are key in respect of preparation of the RSES, these include:

- Identified infrastructure deficits;
- Key investment and sectoral plans of Government Departments and Agencies;

- Regional Action Plan for Jobs;
- Local Economic and Community Plans (LECPs).

It is intended that the RSES will co-ordinate spatial planning, economic objectives and investment programmes, therefore providing an opportunity to move away from separate spatial planning and economic objectives. Meath sits in the Eastern and Midlands Region, which is the smallest of the three new Regional Assemblies, geographically, however it is fair to say that it is the most significant, economically, by virtue of the presence of Dublin and the counties making up the Eastern Spatial Planning Area (SPA), namely Meath, Kildare and Wicklow along with Louth, which is also part of the Border SPA.

1.4 Local Planning Perspective

1.4.1 Meath County Development Plan, 2013-2019

Core Principle 1 of the Meath County Development Plan, (CDP) is:

‘To develop Meath’s critical role in the Dublin and Mid East Region and its role as part of the Dublin City National Economic Gateway maximising on its proximity to Dublin Airport.’

Core Principle 5 requires the Council:

‘To encourage mixed use settlement forms and sustainable centres, in which employment, housing and community services are located in close proximity to each other and to strategic public transport corridors.’

Dunboyne is designated in the County’s settlement hierarchy as a Large Growth Town II.

Section 2.3.1 Future Population Growth states that:

‘It is necessary to direct development into the Metropolitan Area to promote consolidation of development at locations proximate to the City Gateway and close to services and facilities. The RPGs recommend that a minimum of 11% of household growth be directed to the Metropolitan Area of the County. The household allocations in Table 2.4 direct 17% to the Metropolitan Area (see also Figure 2.1). Dunboyne as a Large Growth Town II directly served by new public transport infrastructure will be the focus for the Metropolitan Area.’

Section 3.4.3 of chapter 3 Settlement Strategy and Housing states as follows:

‘As a key Metropolitan Area settlement, Dunboyne will have a similar role in the settlement hierarchy to Navan and Drogheda. Like the Large Growth Towns I, it will be a key growth centre in the County and encompass regional economic activity and local service provision. However, growth should be planned for a population in the order of 15,000 – 30,000 persons

and it is important that new services and facilities should be provided as the town expands. Dunboyne also has a strong economic function, albeit different to Navan and Drogheda. Dunboyne has been identified as a secondary economic growth town in the Development Plan economic strategy.'

The Plan goes on to state that:

'Ashbourne/Dunboyne economic growth area experiences high levels of outward commuting to Dublin, and it is important that economic stimuli measures are underpinned by necessary supporting infrastructure investment, particularly in relation to water and waste water services.'

In particular SS OBJ 9 states as follows:

'To ensure that Dunboyne develops as a key settlement centre in the Metropolitan Area of the Greater Dublin Area and to ensure that the settlement grows in a manner that is balanced, self sufficient and supports a compact urban form and the integration of land use and transport.'

The CDP recognises that it is necessary to direct development into the Metropolitan Area of Meath to promote consolidation of development at locations proximate to the City Gateway and close to serves and facilities. As a Large Growth Town II directly served by new public transport infrastructure, Dunboyne will be the focus for the Metropolitan Area of the County.

1.4.2 Dunboyne Clonee Pace Local Area Plan, 2009-2015, incorporating Variation No 2 of the County Development Plan 2013-2019

As a key Metropolitan Area settlement, the County Development Plan provides that Dunboyne, a Large Growth Town II, will have a similar role in the settlement hierarchy to Navan and Drogheda. Like the Large Growth Towns I, it will be a key growth centre in the County and encompass regional economic activity and local service provision. However, growth should be planned for a population in the order of 15,000 – 30,000 persons and it is important that new services and facilities should be provided as the town expands.

Section 1.4 of the LAP outlines the challenge for the Plan as follows:

'There is significant status conferred on Dunboyne in the economic and settlement strategies outlined in the Meath County Development Plan 2013-2019. This built on the status conferred in the previous County Development Plan (2007-2013) which was in effect when this LAP was prepared. This Local Area Plan should represent the detailed articulation of these strategies as they relate to this area and provide a means of enabling their delivery. The availability of high quality public transport links serving Dunboyne also provides an opportunity to model the future development of the town on the best principles of sustainability.

In addition, this Local Area Plan must create the conditions that facilitate population growth being directed to the Dunboyne/Clonee/Pace Corridor such that it achieves the status identified in the County Development Plan. The Corridor is unique in Meath due to its proximity to other larger centres within Kildare and the four Dublin Authorities, its high quality and high capacity transportation infrastructure, physical characteristics such as undeveloped lands for expansion and its relatively young population. These characteristics present considerable potential for the short, medium and long term potential of the area to develop as a residential, social and economic centre within Meath, the Metropolitan Area and the GDA. It must ensure that the population is provided with the required employment, social and physical infrastructure that allows people to have choice in where they work and in the mode of transport to work. The Local Area Plan must help create a place where a high quality of life can be provided to provide self sustaining settlements that make a contribution to the prosperity of the wider region.

Section 2.1 of the LAP states that:

'It is clear therefore that the corridor is earmarked to become a significant development centre, predicated on the basis of rail based sustainable communities. It is also clear that a policy framework is being developed which will provide for a sustainable, plan-led and balanced pattern of growth.'

Section 3.5 discusses Development Opportunities pursued in the Local Area Plan:

'The completion of the M3 motorway and Phase I of the Dublin-Navan railway line has delivered a rail and motorway interchange and Park and Ride north of Dunboyne. The emerging strategy contained in the IFPLUT finds that the significant development potential of the Corridor would be best harnessed at this location particularly within the context of development constraints elsewhere in the Corridor such as Dunboyne and Clonee.

Section 4.3.2 states that:

'Meath County Council in its précis of evidence to the Oral Hearing in respect of the Clonsilla to Pace rail line in 2007 states that Íarrród Éireann acknowledges the potential identified by Meath County Council and developers for possible future retail and commercial developments at Pace Park and Ride and that current proposals (at time of hearing) should not limit or prevent future development plans. The précis also notes that if expansion of the Park and Ride is required in the future this may be accommodated in a multi storey format. The précis goes on to state that the County Council would also consider that the potential exists to develop over the park and ride for other commercial uses proximate to the public transport interchange.'

Section 4.2.4 outlines Retail Policies and contains Objective RET OBJ 1V which states as follows:

'To prepare a unitary Framework Plan for the 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 shall be phased and coordinated

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, coordinated and efficient manner where such development is facilitated and accompanied by the required infrastructure and services. The Framework Plan shall provide, inter alia:

- *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;*
- *High end office based employment uses at levels commensurate with its location and proximate to a multi modal public transport interchange;*
- *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 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.'

Section 7.5.2 discusses the Green Belt and states as follows:

'The Green Belt designation which was in place between Dunboyne and the floodplain has been extended in this Local Area Plan. The purpose of the Green Belt is to protect the established floodplain from inappropriate development and to prevent the physical and visual coalescence of Dunboyne and Clonee.'

1.4.3 Dunboyne Clonee Corridor Growth Corridor Strategic Framework Guidance

Building on the basis of the foregoing LAP, the purpose of this document is to support the future growth of the Dunboyne/Clonee Growth corridor and to realise the potential of the area as a Metropolitan growth centre for sustainable living and strategic employment within County Meath. Achieving this requires that housing, community facilities and employment areas are located within close proximity to each other and in such a manner that optimises the investments in public transport and opportunities for greener travel. A core concept underlying growth for the area is based upon developing the area as a low carbon zone.

This document is not a statutory plan, it is instead intended as non- statutory guidance to drive the development of the corridor over many years. In the short term it can be used as an advisory document to inform statutory plans. The key aims of the study are as follows:

1. Develop the corridor as a centre for regional population growth and an enriched living environment for sustainable communities.
2. Strengthen and enhance the role of the corridor for local and strategic employment growth in line with national economic priorities for the National Gateway.

3. Optimise investments in the public transport system and encourage and enhance sustainable travel by walking, cycling and public transport.
4. Align sustainable growth within the corridor with green infrastructure planning principles and low carbon economies.

The spatial expression of the foregoing aims will result in the triangulation of growth around the three nodes consisting of the town centre and the two rail stations. (See Map Overall Growth Principles)

1.4.4 Economic Development Strategy for County Meath 2014-2022

The Meath County Development Plan 2013-2019 identified two key socio economic deficiencies i.e. the extent of outbound commuting and the lack of employment opportunities in the County. The Council embarked on an evidence based approach to addressing these issues by firstly preparing an Economic Strategy which was completed in 2014. PMCA Consultants (Economist), John Spain and Associates (Town Planning) and Jim Devlin of FTI Consultants (Marketing) were retained by the Council to prepare the Economic Strategy and the Spatial Implementation Plan. The spatial implementation element of the Strategy comprises of Variation 3 of the County Development Plan and Marketing Consultants have been recently appointed to deliver on the employment targets set out in the Strategy. The foregoing provides background to the process and sets out the rationale for the Council's intervention in the economic future of the County as envisaged in 'Putting People First 2012 ' and the Local Government Reform Act 2014 which requires local authorities to take a lead role in economic regeneration and employment creation. The Economic Development Strategy is also mindful of the wider regional context of economic and employment development in Meath and neighbouring local authority areas.

It identifies that existing trends within the County which impact on the economic performance of the County include:

- A narrow base of economic activities in largely traditional areas;
- A Foreign Direct Investment (FDI) deficit;
- Low penetration of knowledge-orientated activities; and
- Substantial skills leakage due to commuting trends out of the County.

Together with setting evidence-based measures aimed at accelerating the economic transformation, revitalisation and sustainable development of County Meath, the Strategy also assesses spatial planning opportunities, in the form of identified sites around the county, and the 'fit' of these locations in the context of achieving a re-balance of economic activity.

Dunboyne is identified as one of five key settlements within the county where the advancement of strategic sites is recommended as outlined in Map 4.2 , which was published by the Council as part of Variation no.3, (please refer to STRATEGIC EMPLOYMENT SITES MAP 4.2)

1.4.5 Local Economic and Community Plan 2016-2021

The spatial planning process aligned with the Local Economic and Community Plan (LECP) process now facilitates the co-ordination of the public and private sectors to stimulate economic activity and in particular job creation and ensures that appropriate development happens in the right place at the right time. The regional dimension (which has oversight of the LECP's) creates scaled structures to establish stronger co-ordination and better interface with Central Government. The Meath LECP was approved by the Eastern and Midland Regional Assembly at their meeting of 7th March 2016.

The following SEDO's extracted from the adopted LECP for County Meath are of relevance:

'SEDO 2.9 Facilitate enterprise and employment development within County Meath through a streamlined and efficient local planning process.

Purpose

Spatial Implementation – Promote our towns and strategic employment sites as the economic drivers for employment in Meath while acknowledging the role of the rural economy.

Activity

- *Promote the hierarchy of economic centres and targeted sectors in Meath with the objective of facilitating significant new enterprise development.*
- *Examine pilot strategic sites to advance in Navan, Ashbourne, Drogheda, Kells and Dunboyne including targeted sectors and cluster opportunities. Develop and implement best practice to advance same. (emphasis added)*
- *Ensure local planning processes in place aimed at ensuring a flexible and business friendly system that will facilitate employment opportunities.*

Outcomes

- *Sustainable development promoted*
- *Economic growth within these towns advanced*
- *Meath a business friendly environment*

SEDO 2.10 Facilitate enterprise and employment development within County Meath through effective infrastructure provision – sites and property solutions for employment generation.'

SECTION 2

PUBLIC CONSULTATION PROCESS

2.1 Public Consultation

2.1.1 Background Process- Variation

1. A copy of draft Variation No 3 of the Meath County Development Plan 2013-2019, together with the Strategic Environmental Assessment Screening, Appropriate Assessment Screening Statement and Strategic Flood Risk Assessment and Management Plan was available for inspection from Monday 21st December 2015 to Wednesday 27th January 2016. 182 no. submissions were received on the proposed variation during this statutory period including a submission from Department of Environment, Community and Local Government, of 27th January 2016, (Copy of submission contained in Appendix D). The Chief Executive's report was circulated to the Elected Members on 23rd February 2016.
2. The Elected Members on 7th March 2016 agreed to materially alter the proposed variation, thereby necessitating a further public display period. A copy of the material alterations to draft Variation No 3 of the Meath County Development Plan 2013-2019, together with the Strategic Environmental Assessment Screening, Appropriate Assessment Screening Statement was available for inspection from 22nd March 2016 to 19th April 2016. 9 no. Submissions were received as a result of the public display of the material amendments including a submission from Department of Environment, Community and Local Government dated 19th April 2016, (Copy of submission contained in Appendix D)
3. The Chief Executive wrote to the Principal Planning Advisor at the Department of Environment on 13th April 2016 stating as follows: *'I am satisfied to confirm on behalf of Meath County Council that we have complied with all your requests regarding all matters under our direct control.'* (Copy of letter contained in Appendix C)
4. Senior Counsel's opinion was sought in respect of the content of the submission of the Department of Environment of 19th April 2016 as it related to the Pace lands (Dunboyne North) and said opinion stated that it was not open to the Elected Members to consider the contents of same at the amendment stage of the process as this area was not the subject of a material amendment. (Copy of Senior Counsel Opinion contained in Appendix E)
5. On 23rd May 2016, the Elected Members of Meath County Council unanimously approved variation No 3 of the Meath County Development Plan.

2.1.2 Statutory Process - Draft Direction

1. On 17th June 2016, notice was received from the Office of the Minister for the Environment, Community and Local Government of a Notice of Intent to Issue a Direction relating to Variation No.3 of the Meath County Development Plan 2013-2019 as it related to lands at Dunboyne North (Pace).
2. Pursuant to Section 31 of the Planning and Development Act 2000 (as amended), a Public Notice advising of the Notice of Intent to issue a Direction in relation to Variation No 3 of the

Meath County Development Plan 2013-2109 2022 and the availability of the Draft Direction for review was published in the Meath Chronicle on 27th June 2016.

3. The Draft Direction was on public display at the following locations for the period 29th June 2016 to 13th July 2016:
 - **Planning Department**, Buvinda House, Dublin Road, Navan, Co. Meath C15 Y291;
 - **Ashbourne Municipal District**, Ashbourne Civic Office, 1 -2 Killelland Square Upper, Killelland Street, Ashbourne, A84 NY73;
 - **Kells Municipal District**, Kells Civic Office, Headfort Place, Kells A82 W2R3;
 - **Navan Municipal District**, Town Hall, Watergate Street, Navan C15 C821;
 - **Laytown-Bettystown Municipal District**, Duleek Civic Office, Main Street, Duleek A92 R9KW
 - **Ratoath Municipal District**, Dunshaughlin Civic Office, Drumree Road, Dunshaughlin A85 XK20;
 - **Trim Municipal District**, Trim Civic Office, Mornington House, Summerhill Road, Trim C15 P2HE;
 - **Dunboyne Library**, Rooske Road, Dunboyne.

2.2 Submissions

Section 31 of the Planning and Development Act, 2000 as amended requires that submissions are summarised in the following order:

1. General Submissions;
2. Any submission from the Elected Members of the Planning Authority;
3. Any submission from the Regional Assembly.

A copy of all submissions are included in Appendix B.

A total of 8 no submissions were received.

As the following summaries will demonstrate, 6 are very supportive of the proposal.

The submission from the Director of the Regional Assembly effectively reiterates points already made in the previous submission from the Regional Assembly of 19th January 2016. This submission states as follows:

'The Assembly Members from Meath County Council are not supportive of this submission and the Members of the Assembly recognise that all the Members of Meath County Council supported the proposed draft variation as placed on public display.'

2.2.2 General Submissions

Submission No	Name
2	Aramark Ireland

Summary of Submission

The Aramark Corporation are a leading global provider of food, facilities, property services and uniform services to education, healthcare, business and industry, sports, leisure and correctional clients with 270,000 employees worldwide. The company are currently looking at a number of locations to establish a Northern European Headquarters and the company are in active discussions with regard to a viable option at the lands north of Dunboyne.

The following is a summary of the main points of the submission:

- The company’s requirements in terms of site selection include proximity to Dublin city and airport, good accessibility including to public transport, high capacity utilities and 50,000 sqft office space ideally in one building;
- The company are currently undertaking a significant investment in Dunboyne to establish an Avoca outlet adjacent to the proposed Shire facility at Piercetown.
- The Company is seeking to create a location that reflects the Corporate appeal of their business. A mono use location will not deliver this and is a barrier to recruitment of employees which is a key asset to their success.
- The submission concludes by expressing support for the Councils’ vision as set out in Variation 3.

Submission No	Name
3	Cliona Ryan, Property Resource Planning Management & Development on behalf of Glenbeigh Construction Ltd

Summary of Submission

Glenbeigh are experienced property developers having been in the building business for three decades. They have, for over a decade, held and maintained a serviced, accessible and residentially zoned strategic land bank on the Rooske Rd, Dunboyne.

The following is a summary of the main points of the submission:

- Variation 2 of the CDP 2014 altered the land use zoning objective of the lands from A4 to A2 and also placed the lands in phase II i e with a post 2019 release date.
- Variation No 3 of the CDP due to its extent and impact is an effective review of the Dunboyne, Clonee Pace LAP, 2009. Therefore the release of residential lands to service the needs of employment lands is best serviced by releasing residentially zoned lands currently in Phase II.
- The submission realises the benefits of zoning the lands the subject of the Draft Direction, to accommodate the development of this town to realise its role in the GDA as a Large Growth Town II, however the submission considers that lands such as their land bank should be allowed to develop at least in tandem with new employment and residential lands.
- The submission provides, by way of support to the points articulated therein, a review of planning policy for Dunboyne.
- A brief synopsis of the role of Dunboyne as set out in the RPGs and in the Meath County Development Plan is provided. The importance of the sequential approach to land use zoning is referenced.
- The progress of development in Dunboyne is set out and the two year progress report of the County Development Plan is referenced. The submission considers that this report took a simplistic approach in that it took a measure of existing planning permissions but failed to perform any analysis of location and likelihood of development.
- The submission refers to the continued lack of development in Dunboyne and therefore population increase of the town has lagged behind lower tier settlements even before economic recession.

- The submission considers that the development of critical mass is key to the development of Dunboyne as the second town in County Meath, therefore the realising all of the residentially zoned lands for development is now in the interests of proper planning and sustainable development of the town.
- The submission concludes by restating that lands already identified, accounted for and serviced for development should be allowed to develop at least in tandem with the new employment and residential lands. The requirement for a *'time delimited strategic transportation study for the newly rezoned employment and residential lands at Pace and Dunboyne North'* is also explored in the concluding remarks.

Submission No	Name
4	RPS Planning and Environment on behalf of Godolphin Ireland Unlimited Company, Kildangan Stud, Monasterevin County Kildare

Summary of Submission

Godolphin Ireland is the owner and manager of Woodpark Stud which is immediately to the North of Pace, north of Dunboyne.

The following is a summary of the main points of the submission:

- The mix of uses which would be delivered by the proposed variation represents a valuable opportunity for the strategic planning and sustainable development of Dunboyne which will contribute to the delivery of county wide economic imperatives and opportunities.
- The submission refers to the designation of the lands as a strategic employment site, the inclusion of residential development is considered to be a key aspect of the proposed development of these lands as a sustainable live work community.
- The submission fully supports the promotion of 'Dunboyne North as a sustainable community with employment, local retail, educational and community services.

Submission No	Name
5	South East Meath Chamber of Commerce

Summary of Submission

The submission outlines that the Chamber was set up in 2010 to promote the economic development of the area.

The following is a summary of the main points of the submission:

- Submission expresses support for the development of the lands at Dunboyne North.
- The submission refers to their location within the Dublin Metropolitan Area and the Chamber believes that it is critical to the economic development of South Meath that these lands are developed as quickly as possible.
- The Chamber has had numerous meetings with Embassies, International Chambers of Commerce and International Real Estate Consultancies. The feedback from these meetings has been that companies are looking for attractive campus style office parks, excellent communication and transport infrastructure but the most critical factor is the availability of quality housing for their staff and schools and educational opportunities for their children.
- The submission considers that despite the amount of land zoned for housing there is an inadequate housing stock available in Dunboyne.
- Regarding the residential element of the proposal the submission refers to the zoning of the lands since 2009 for a Level II retail centre which would have included residential development.
- The submission refers to the recent Brexit vote which has resulted in almost all companies with a European HQ in the UK will be seeking to relocate to Amsterdam, Frankfurt or the Dublin Area.

Submission No	Name
6	Declan Brassil on behalf of McGarrell Reilly Group

Summary of Submission

The submission is accompanied by a letter prepared in conjunction with Nuala Butler, SC. The submission also includes inputs from Systra Transportation Consultants, Ciaran Ferrie Architects, Cronin Sutton Consulting Engineers and RPS Consulting Engineers. The letter contains a request that the submission would be forwarded in full to the Minister. Having regard to both complexity of the submission and the legal arguments presented in the cover letter this request is considered to be reasonable, please refer to Appendix B for same.²

The submission addresses the following topics:

- The status of Dunboyne North in the Metropolitan area of the National Gateway and the GDA is set out and the submission considers that if Dunboyne is to fulfil its regional growth objectives a population increase of circa 18,000 must be accommodated requiring approximately 6,700 additional residential units which must be balanced with employment, community, leisure and other commensurate facilities.
- An analysis of the performance of County Meath and Dunboyne in meeting Regional Development objectives is provided which states that Meath has failed to meet its regional settlement and economic objectives as identified in the RPGs. The strategies and objectives in place remain robust and sustainable, however private sector investment has been largely absent.
- The purpose of Variation No 3 is set out which is to provide an appropriate policy base for the realisation of economic objectives.
- Constraints for the planned growth of Dunboyne are listed and mapped. These include the River Tolka and associated flood plain, rail line and motorway, the infrastructure required to develop the lands east of the rail line, the distance of lands to the south of the town from the town centre and rail stations. Opportunities for the planned growth of Dunboyne are also mapped. The analysis concludes that Dunboyne North is a sustainable, infill urban expansion area centred on a multi- modal transport node which is key to Dunboyne meeting its regional growth targets.

² On the basis of Council's agreement to consent to this request, all 8 submissions received have been included as set out in Appendix B.

- The submission provides an analysis of the statement of reasons for the Draft Direction. The statement that the lands are distant is not accepted, information is provided regarding the proximity of the lands to the town centre.
- The submission refers to the absence of any reference to the existence of a rail station at Dunboyne North, which is central to the assessment of the suitability of the lands for development.
- The submission outlines that reference to the Spatial Planning and National Road Guidelines 2012 does not acknowledge the regional policy status of Dunboyne and the rail station. The submission considers that National and Regional policy both advocate that growth is channelled to and consolidated at such locations.
- Flood management has not been cited in the draft Direction, the submission includes an assessment from RPS which states that they are satisfied that the scheme will not be impacted by the 1% AEP flood event, nor will flooding impact on connectivity or accessibility of these lands.
- Appendix 1 of the submission is a review by Systra Transportation Engineers of the Transportation Assessments already undertaken. The transport appraisal undertaken to date includes an assessment of the M3 pace junction by Cronin Sutton Consulting and a strategic transport assessment of future land use proposals for Dunboyne by AECOM on behalf of Meath County Council.
 - The submission outlines that the transport assessment undertaken by AECOM adopted an industry standard approach to conducting a Strategic Transport Assessment. Furthermore the model development and assignment processes are in accordance with requirements and as such a robust transport assessment has been undertaken
 - The analysis of the M3 Junction at Pace, undertaken by Cronin & Sutton contains a number of assumptions relating to trip generation and distribution which are based on reliable data sources. Whilst these assumptions are adequate for the assessment undertaken it is recommended that a more comprehensive assessment is undertaken at detailed planning stage
 - The submission concludes by recommending that at detailed planning stage, further detailed work be undertaken to understand the multi-modal transport requirements, traffic impacts and any mitigation measures which may be necessary. It is recommended that this additional work includes use of the NTA's East Regional Model in combination with TII's National Road Model. This should be accompanied by a Mobility Management Plan and Sustainable Access Movement Strategy for the area.
- The submission concludes that it is inevitable that significant urban expansion will occur at Dunboyne North, as it is appropriate and consistent with all relevant principles of proper planning and sustainable development.

2.2.3 Submissions of the Elected Members of Meath County Council

Submission No	Name
7	Cllr Maria Murphy, Cathaoirleach Meath County Council on behalf of the Elected Members of Meath County Council

Summary of Submission

- The submission sets the variation in an economic context. Dunboyne is identified by the Economic Strategy as one of five key settlements within the county where the advancement of strategic employment sites is recommended. The submission outlines that a number of companies have already invested in this area and the wider economic context post Brexit is referenced.
- The submission articulates that the development of the subject lands for a ‘live work’ community is fully supported by the Elected Members and the Executive of Meath County Council, the Planning and Economic Development Strategic Policy Committee and the Meath Economic Forum. It is the intention for Dunboyne North to facilitate the creation of a strategic employment hub and sustainable community, based on sustainable development principles
- The submission refers to ongoing work being carried out investigating the potential traffic/transportation impacts of the County Development Plan, including Draft Variation No. 3, on the M3/N3 corridor.
- The lands at Dunboyne North have been zoned since 2009 for a more intensive form of mixed use development, including a new Town Centre development which would have a greater impact on the M3 Motorway than the proposed zoning.
- Given the current housing shortage within the Greater Dublin Area, it is considered to be of paramount importance that lands which can sustainably accommodate the identified shortfall are identified and brought forward for development as is the case with Dunboyne North.
- All areas of the land proposed to be rezoned for new housing are within approximately 600m of M3 Parkway (a public transport hub), in a highly sustainable location.
- The submission concludes that recent enquiries from prospective investors to Meath County Council, clearly demonstrates the economic and employment potential of the said lands and the concept of a ‘live work ’ community, which is clearly attractive to investors, at a time

when accommodation has become even more important in the mix of competitiveness criteria for Foreign Direct Investment.

Submission No	Name
8	Cllr Gillian Toole, Cathaoirleach Ratoath Municipal District Meath County Council on behalf of the Elected Members of Ratoath Municipal District

Summary of Submission

Please refer to summary at Submission No 6 above.

2.3 Submission of the Director of the Regional Assembly

Submission No	Name
1	Jim Conway, Director, Eastern and Midland Regional Assembly (EMRA)

Summary of Submission

The submission was prepared by the Assistant Director and approved by the Director of the Regional Assembly.

- The matters of concern raised by EMRA in their submission of 15th January 2016 were not fully addressed by the Planning Authority.
- The draft variation proposal to create a new community/settlement at a greenfield location is lacking sufficient policy support in the RPGs and the relevant evidence based analysis to support such expansive proposals.
- The existing growth pattern for Dunboyne identifies that growth is to occur to the east and south of the town in a sequential manner that consolidates the existing town fabric,

strengthens linkages with the local train station at Dunboyne thus aiding the long term sustainable development of the settlement.

- EMRA remain concerned that the variation as proposed amounts to the creation of a new community remote and detached from the existing urban fabric of Dunboyne.

SECTION 3
RESPONSE AND RECOMMENDATION
OF
CHIEF EXECUTIVE

3.1 Background

In 2014, by way of response to the new economic role placed on local authorities by the Local Government Act 2014, Meath County Council positioned itself at the forefront of service delivery - particularly in relation to economic development. An 'All-of-Council' approach to the conducting of Council business was adopted by firmly establishing a positive economic development culture within the Council. An Economic Strategy for the County was completed in 2014 by an external team comprising PMCA Economic Consultants and John Spain and Associates (Planning Consultants). The key target of the strategy is to deliver 7,500 jobs by 2022. The organisational structures necessary to deliver the strategy were put in place. A number of initiatives in the economic area were progressed, including the establishment of the Planning and Enterprise Strategic Policy Committee, the Meath Economic Forum and a Technical Working Group comprising of senior technical and administrative staff of the relevant Directorates of the Council.

In particular, the support of the Council's Elected Members and the advisory inputs and insights from the Meath Economic Forum were recognised as key to the successful delivery of the Economic Strategy. The Strategy when concluded in late 2014 was presented to the Elected Members of Meath County Council, the Planning and Enterprise SPC and the Meath Economic Forum and was enthusiastically received and fully endorsed by all. The collaborative input from the Departments Planning Inspectorate to the Councils Technical Working Group and the Meath Economic Forum has been very beneficial and is viewed as an essential component in the successful delivery of a sustainable economy in the County.

As discussed by PMCA in their report, (please refer to Appendix G for full text of same) preliminary Census 2016 results indicate that County Meath is the fastest growing county (entire) in the country in the intercensal period 2011-2016. Consequently the trends identified by the Economic Strategy in regards to lack of employment and outbound commuting are likely to have been exacerbated and hence the need to promote the full suite of measures contained in the Economic Strategy in as timely a fashion as possible.

3.2 Economic Development Strategy Update to Department of Environment, Community and Local Government

A letter to the Principal Planning Advisor dated the 17th July 2014, updated the Department in respect of ongoing work regarding the preparation of an Economic Development Strategy for County Meath (See Appendix F for full text of letter and enclosures). The letter set out that Meath County Council had been working collaboratively with the Department and other stakeholders since the commencement of the project and appreciation for the input that Bruce Mc Cormack, previous Department Inspector for Co. Meath, had brought to the process was acknowledged.

The letter refers to the gathering momentum towards national economic recovery which presents a timely opportunity to take stock of Meath's comparative advantages and to develop a policy platform that will help deliver sustainable economic growth. In particular the letter stated that it

was vital that Meath be facilitated in playing a greater role in the future development of the National Gateway.

The letter notes that '*Meath Economic Baseline Study*' prepared by Maynooth University, which conveyed the existing socio-economic profile of the county indicated that the county saw a rise of 13.1% in population but a fall of 5.2% in total employment between Census 2006 and Census 2011. The figure of 82% of the total workforce employed in 2011 had to be viewed against the backdrop of major outward commuting patterns, predominately from the east and south of the county. The letter goes on to state that County Meath had effectively the highest rate of outbound commuting in the country which had largely negative implications for the quality of life of our communities. In effect an unsustainable pattern of development had been established in Meath which needed to be addressed as a national planning issue. The letter set out the view that the Strategy anticipated current government policy and had the wherewithal to deliver key targets outlined in national policy. The letter also advised that the Strategy sought to synergise spatial planning with the delivery of primary economic objectives in the most efficient and appropriate way.

The summary attached to the letter outlined that the Spatial Implementation Plan was to focus on recommendations in terms of urban centres and sites in addition to policy analysis and formation. The latter was intended to convey best practise to integrate investment opportunities with land-use planning proposals. The spatial element of the Strategy would consider a number of sites around the county with employment development potential, together with existing services and identify what additional supports would need to be put in place to make the economic environment of County Meath more investor-ready and/or attractive to business development.

The principle outcome of the Spatial Implementation Plan was to recommend the development of five key strategic sites in higher order settlements to attempt to redress the prevailing unsustainable commuting patterns. This will enable County Meath to positively contribute to the national economic recovery with particular reference to Meath's role in the National Gateway. The identification of these sites is based on the existence of a number of radial multi-modal corridors, traversing the County, extending across Meath's Metropolitan Area, outwards from the National Gateway, (please refer to STRATEGIC EMPLOYMENT SITES MAP 4.2).

3.3 Variation No 3 Process

The recommendation detailed above, provided by our consultants, was followed in the subsequent Variation process which envisaged the established of strategic employment sites in the towns of Navan, Drogheda, Dunboyne, Ashbourne and Kells with particular emphasis on the attraction of Foreign Direct Investment, which was identified as a key deficit in the County's economy.

Draft Variation No. 3 was placed on public display from Monday 21st December 2015 to Wednesday 27th January 2016. The Elected Members on 7th March 2016 agreed to materially alter the proposed variation, thereby necessitating a further public display period. A copy of the material alterations to draft Variation No 3 was placed on public display from 22nd March 2016 to 19th April 2016.

The Director of Planning and Enterprise and Senior Planning Staff met with Planning Officials from the Department on 20th January 2016. Subsequently the Department's Principal Planning Advisor

met with the Chief Executive of Meath County Council and discussed the submission of 27th January 2016 in detail (See Appendix D for content of submission).

Following on from this meeting and having considered the matters raised, the Chief Executive wrote to the Principal Planning Advisor on 13th April 2016 (see Appendix C). This letter indicated that the Variation No.3 process was based on independent planning and economic advice and provided a rigorous evidence base for the actions. In relation to Dunboyne North it stated as follows:

'In the context of Dunboyne this approach specifically supports the role of the Metropolitan Area in County Meath through the redirection of approved but unused residential capacity from hinterland areas within the county. I noted yesterday that very little progress was being made on the residential supply side in the area at present and same is evident by the pronounced lack of Commencement Notices being received by the Council.'

It stated that:

'The future 'live work' community would be master planned in a process that would be directly managed by professional planning staff. A key element of this supervised transparent process will be the requirement contained in the draft variation that employment development is front loaded. This will ensure that the area, in conjunction with other lands in the vicinity, will play its part in reducing levels of outbound commuting.'

It further stated that in relation to the specific matters raised in the Department's submission that:

'The Council have complied with your requests as they pertain to the following:

- 1. Insertion of a spot objective for FDI on lands proposed to be zoned between the ' Facebook site' and Bracetown Business Park which ensures that the lands are regulated to focus on large footprint FDI type projects.*
- 2. Reintroduction of Phase II employment lands in lower tier centres to avoid any drift towards noneconomic development enterprise uses emerging in such centres.*
- 3. In respect of the third key area identified I note the reservations expressed in the submission regarding the residential element of the proposed 'live work' community at Dunboyne North. I welcome that the Department has expressed no concerns with the other land uses proposed at this location.'*

It reiterated that:

'The consistent advice from the consultancy team is that this 'live work community' model is compliant with the proper planning and sustainable development of the area and would enable maximum benefit to be accrued from the substantial public investment in largely underutilised multi-modal transportation infrastructure in this area.'

The correspondence was concluded with the following summary which set out the position of Meath County Council at that time as follows:

'In summary, I am satisfied to confirm on behalf of Meath County Council that we have complied with your requests regarding all matters under our direct control. We have fully

considered the point raised regarding the residential element of the 'live work' community at Dunboyne. As we discussed yesterday, residential affordability is currently a key National concern and as noted, it is emerging in relevant studies as a key barrier to attraction of FDI particularly in the Metropolitan Area of the GDA. Meath County Council's records indicate that since 2014 we have received Commencement Notices for 13 dwellings in the Dunboyne area. This level of residential activity is a poor reflection on the designation of the area as a major Growth Centre in the Metropolitan area with a designated target population of 25,000 persons by 2036. The progress of the settlement to date represents a poor return on the public investment in front-loaded transport infrastructure in the area.'

Whereas the letter was acknowledged, a response was not received.

The Department did, (in the context of a submission in respect of the proposed material alterations to the draft variation), issue further correspondence on the Variation process, which required the removal of all zonings within the lands the subject of the Draft Direction and required the reinstatement of the previous zonings for a Level 2 Centre with attendant high end employment lands as set out in the existing Local Area Plan. The Council's Senior Planning staff recommended that legal advice should be sought on the matter. Senior Counsel advised that it was not open to the Elected Members to consider the contents of same at the amendment stage of the process. The advice was circulated to Department Officials. (Copy of Senior Counsel Opinion with cover letter to the Department contained in Appendix E). While the Council was advised that the matter was being considered by the Department no further correspondence was received.

On 23rd May 2016, the Elected Members of Meath County Council unanimously approved Variation No 3 of the Meath County Development Plan. Prior to their consideration of the matter, the Elected Members were provided with a summary of the legal position as advised by Senior Counsel, (See Appendix E for copy of Senior Counsel Opinion, presentation and meeting minutes).

3.4 Draft Direction

On 17th June 2016, correspondence was received by Meath County Council from the Office of the Minister for the Environment, Community and Local Government formally advising of a Notice of Intent to Issue a Direction relating to Variation No.3 of the Meath County Development Plan 2013-2019 as it related to lands at Dunboyne North (Pace). Section 31 of the Planning and Development Act, 2000 as amended requires the Chief Executive to;

'(a) summarise the views of any person who made submissions or observations to the planning authority (b) summarise the views of and recommendations (if any) made by the elected members of the planning authority (c) summarise the views of and recommendations (if any) made by the regional assembly (d) make recommendations in relation to the best manner in which to give effect to the draft direction'.

In this instance the Executive has made considered evidence based proposals for the proper planning and sustainable development of its administrative area which are in accordance with National, Regional and Local Planning Policy, which were unanimously accepted by the Elected

Members but are subsequently not acceptable to Department. This situation arises notwithstanding the active participation by the Department in the process since its inception. Consequently in this instance there is clearly a difficulty in complying with the Draft Direction. It should be noted that the letter issued by the Department of 27th January 2016 and upon which a number of material amendments were prepared, is at variance with the letter issued on 19th April 2016 and with the content of the Draft Direction which compounds the difficulty of protecting the interests of the Council in the process.

The Chief Executive strongly recommends that the Draft Direction not be proceeded with in accordance with Section 31 of the Planning and Development Act, 2000 as amended and this point will be discussed in more detail in the conclusions.

The Draft Direction provided 3 reasons as to why Variation No 3 not be proceeded with in relation to the lands at Dunboyne North and that the lands revert to the zoning objective contained in the preceding Plan as set out in maps attached to the Draft Direction. Each of the headings is analysed in sequence as set out in the statement of reasons:

3.4.1 Residential Zoning

The Draft Ministerial Direction states that:

'this proposed housing would be detached and distant from the established social, community and other infrastructure of the town. A new residential zoning/development significantly to the north of the established town at Pace (1.5-2km) would be a clear breach of the sequential approach to the zoning of lands identified in Section 4.19 of the Development Plan Guidelines (2007)...The planning guidelines on Development Plans state that zoning should 'extend out from the centre of an urban area, with undeveloped lands closest to the core and public transport routes being given preference.' It further states that *"the proposed residential zoning in Variation No.3 would create an isolated development, physically remote from the established settlement of Dunboyne and would be contrary to the adopted County Development Plan core strategy for Dunboyne...'*

The Report of John Spain and Associates (JSA) which is contained in Appendix G, considers that the distances referenced are inaccurate and submits that the lands represent a natural expansion of the town connected by a strategic use of the flood plain and the creation of a green network of multi user routes to enhance linkages between the main areas of planned and existing housing, work and social activities by the creation of a green spine or linear park with robust multi-modal connectivity to the town centre (See Green Infrastructure Map). The nearest point of the subject lands are less than 250m from the Dunboyne Industrial Estate, approximately 850m by road to the established urban area and the town centre, as defined by the town centre zoning objective, is 1.03 km from the residential area, as the crow flies, and 1.3km by road. The Draft Direction contains no reference to the existence of the M3 Parkway rail station which is adjacent to the residential element on either side of the R157 and which is readily accessible by virtue of the underground pedestrian facilities. The lands subject of the Draft Direction are demonstrably contiguous to Dunboyne Business Park as set out above. Furthermore, the lands are south of Kilsaran, Shire and Avoca therefore constituting an infill site in the corridor (See Growth Principles Map).

The Draft Direction suggests that the proposal would be a clear breach of the sequential approach to zoning as identified in Section 4.19 of the Development Plan Guidelines, however the Draft Direction is selective in its interpretation of the said provisions and fails to recognise that the same section states that,

'a logical sequential approach should be taken to the zoning of land for development through the maximisation of existing and future infrastructural provision'.

The Draft Direction further fails to acknowledge that the Guidelines promote the synergy between land-use and transport planning and state that,

'Integrated land use and transport planning has a key role in delivering social, economic and environmental stability'.

Zoning of residential land should give preference to public transport availability, should encourage strong infill opportunities and should also be contiguous to existing zoned lands. All of the aforementioned are satisfied under the proposal. The Draft Direction is silent on the existence of a rail station at Dunboyne North with 1200 car-parking spaces, which is pertinent given that the sequential assessment of the site would have to take account of the public transport infrastructure available in any objective appraisal.

Furthermore there is a fundamental misinterpretation of the site history and characteristics in relation to the Development Plan Guidelines in that the site is presently zoned to include significant residential development and is essentially contiguous to existing zonings both to the north and south. The 2009 Local Area Plan at Section 4.2.4 outlines Retail Policies and contains Objective RET OBJ 1V which sets out the requirements in respect of the preparation of a unitary Framework Plan which includes *'appropriate residential development'*.

In outlining the grounds upon which the Draft Direction issued (in respect of the residential element) reference is made to Sections 2.3 and 6.2 of the Local Area Plan Guidelines. It is suggested that support for the residential content of the subject land is available throughout the guidelines and particularly the statement that,

'Planning Authorities should, in general, and especially in locations benefiting from substantial investment in public transport, set some quantifiable targets for modal split in favour of public transport, walking and cycling. Such targets should be used to influence phasing and sequential development with the local area plan'.

The Draft Direction contends that the proposed residential zoning would create an isolated development, physically remote from the established settlement of Dunboyne and would be contrary to the core strategy for the town. The term remote would infer that the site is distant in space or hidden away/secluded. Neither are applicable in this instance and indeed the lands are located in an access rich environment and constitute an infill site within the development envelope of Dunboyne (See Growth Principles Map which clearly sets out the spatial context of the land).

Consequently it is not accepted that the subject lands are ‘physically remote’ from the town centre and the contention that the proposal would create an isolated development is not accepted. Rather, the intention of a live/work community is to create an additional sustainable development in Dunboyne, with a mix of commercial, residential, employment and recreational uses adjacent to an existing rail head.

In terms of the stated concern regarding inconsistency with the core strategy, the Chief Executive is satisfied that it is implicit that the Variation should clearly alter the Core Strategy so as to ensure compliance with the County Development Plan as varied. Under the 2 year Progress Report on the County Development Plan it was identified that there are now 641 multiple housing units less committed in the County than when the core strategy was originally prepared. Given the well documented and significant housing shortage within the Greater Dublin Area, it was considered to be of paramount importance that lands which can sustainably accommodate the identified shortfall are brought forward for development. National planning guidance provided policy direction in this regard by allocating a higher percentage of core strategy dwelling numbers to the Metropolitan Area. The Council has adopted a responsible approach by directing 500 of the 641 unused or surplus units now available to Dunboyne, which is the only settlement within Co. Meath that is in the Metropolitan Area. Table 2.4 is explicitly adjusted in Variation No.3. Dunboyne is scheduled to grow to 25,000 by 2034, however little progress has been made since the adoption of the CDP in 2013 in meeting these growth targets. See Aerial Photography in both a Northern and Southern direction which serves to demonstrate that the lands the subject of the Draft Direction are neither ‘distant’, ‘detached’ or ‘physically remote’ and can be demonstrably proven to represent an infill site proximate to a major rail head and road interchange.

3.4.2 Employment Zoning

The Draft Direction states that,

‘Variation No. 3 was not accompanied by a traffic impact assessment or similar evidence basis to determine that there will be no adverse impact on the operation of the adjoining M3 motorway infrastructure’ and further that “the Department considers that the approach required by the Spatial Planning and National Roads Guidelines has not been followed in Variation No. 3 and the zoning has the potential to generate traffic volumes to limit the operation of the nearby national motorway interchange’.

As expressed elsewhere the Draft Direction fails to take cognisance of the presence of a rail station at Dunboyne North with the associated potential for positive modal shift arising from the creation of a sustainable live/work community adjacent to high quality under utilised multi-modal transport infrastructure. There is also an apparent failure to recognise that a comparable area of zoned employment lands was included at this location under the Dunboyne/Clonee/Pace LAP 2009-2015 such that reverting to the extant zoning objective would not alleviate perceived concerns in respect of traffic generation. In fact, JSA advise as follows: *‘If the Council were now proposing to zone the lands for substantial retail development purposes now, as per the Draft Direction, it is likely in our view that both Transport Infrastructure Ireland and the National Transport Authority would object to any such proposal’.* The Direction given by the Minister appears inconsistent with the statement of

reasons regarding traffic generation and will not suffice to achieve the underlying rationale of reducing overall traffic generation. Other Level 2 Retail Centres (for example Blanchardstown and Liffey Valley Shopping Centres) generate significant national and regional traffic whereas the proposed live/work community concept would result in a sparser use of the M3 motorway, with less pressure being placed on both the Black Bull and Dunboyne North/Pace junctions.

With respect to the specific measures sought i.e. a traffic impact assessment or similar evidence base, JSA, in their report have advised that no other Council in the State has been requested to undertake as detailed a level of traffic impact assessment at the Development Plan stage for an individual site as has occurred in this instance. JSA further advised that such a requirement is normally considered as sought under the development management process. JSA also has advised that Fingal County Council has proposed under its Draft County Development Plan 2017-2023 to rezone a very substantial amount of land for employment-related development close the junction of the M50 and the M2 and South Dublin County Council recently zoned additional lands for employment-related development close to the junction of the M50 and the M4, as part of its new County Development Plan. JSA is not aware of a prior detailed transport assessment of these proposals having been undertaken in either instance and suggests that this should not be required in this case.

The Proximal Location Google Map shows the quantum, extent and direction of employment focused development in Fingal, which is clearly rapidly building out the available land within the Metropolitan Area in Fingal a significant amount of which does not have multi-modal access. By contrast the proposal contained in Variation No.3 is a relatively modest, evidence based proposal predicated on addressing the high instance of out commuting from Co. Meath. The lands have exceptional connectivity in the M3 corridor in Meath, which is proximate to the National Airport and Port and Dublin City Centre and thus attractive for FDI and targeted for appropriate development in the full suite of Meath Planning and Economic Development documents on that basis.

In terms of the wider sustainability of the proposed employment zoning, the intention is that current outbound commuters would be intercepted at Dunboyne North, where new high skilled employment opportunities will offer an alternative to commuting into Dublin City. Outside of Dublin, Meath experiences the highest level of outbound commuting of workers in the State. 32,942 or 54% of the county's workforce commute out of the county for work, with 41% of these commuters working in Dublin. There are almost as many people living in Meath but working in Dublin as there are living and working in the county.

The delivery of FDI development will almost certainly reduce the level of outbound commuting experienced, as outbound commuters represent a major talent pool for FDI companies investing in the county and are a unique selling point for the county, with over 41% of those commuting holding third-level or higher educational attainment. Furthermore, in locating such developments in very close proximity to a high quality public transport corridor, there will be options for inbound commuters to travel by train to work at Dunboyne North. Finally it is important to state Junction 5, similar to other Junctions along the Motorway network has the capacity to be upgraded as it responds to demand. These matters are confirmed in the Technical Note provided by Aecom Consulting Engineers, (please refer to Appendix I) which is summarised as follows:

- *‘Significant evidence based work has been undertaken in the past to assess the transport impacts and requirements for the Dunboyne area with future development proposals in place. Ongoing work, commissioned by Meath County Council, will continue this process through the development of an up to date 2016 VISUM model to assess road based issues and interventions and through the use of the NTA’s ERM Model to assess and inform a public transport and sustainable travel strategy.*
- *Previous transport assessments have concluded that a number of road infrastructure improvements are required to cater for future demand including upgrades to both the Clonee and Pace interchanges and various local schemes such as the Dunboyne Eastern Bypass. This process will be revisited as part of the ongoing task with Meath County Council to ensure the transport strategy remains valid and represents the optimum road network to cater for future travel demand and patterns.*
- *In solely transport terms, the Dunboyne and Pace areas are well suited for future development through their location adjacent to the National Road and public transport networks and accessibility to strategic infrastructure such as Dublin Airport.*
- *The M3 Parkway rail station is currently significantly under-utilised. Development adjacent to the station with attractive walking and cycling linkages would result in increased patronage at the station and improved PT mode share for the area.*
- *A Sustainable Travel Access & Movement Strategy would be a valuable tool to ensure future development in the area takes cognisance of the overall strategy for the area in this regard ensuring attractive linkages for walking and cycling are provided within the site, to local destinations and to local public transport services.*
- *The key existing issue is the performance of the Pace junction which is currently experiencing significant congestion in the peak traffic hours. Potential mitigation measures will be assessed as part of the ongoing task however it should be noted that a significant proportion of the congestion issues arise mainly due to toll avoidance as opposed to other local issues. The M3 mainline operates well below capacity both north and south of Pace in the present case.’*

Turning to the economic context for the proposed employment zonings, the report of PMCA (Please refer to Appendix H) states as follows:

‘Dunboyne encapsulates all the challenges, but also the opportunities, relating to economic development in County Meath. It has very high outbound commuting (as referred to above), where those living in the town and its environs have taken advantage of its favourable location and multi-modal transport infrastructure to work in Dublin, whereas the opposite pattern of commuting (i.e. into Dunboyne) has not been apparent.’

The PMCA report goes on to state that:

'The high leakage of economic activity from Meath in general, and from Dunboyne in particular, highlights the need to address the leakage because the area benefits from a wide range of comparative advantages (including favourable location, transport infrastructure, skills and talent, and strong existing businesses) that would enable more investment and more employment to be created within the County, contributing in turn to the sustainable development of the County. This is precisely the aim of Variation No. 3 – to realise the economic development potential of Dunboyne and the County as a whole.'

The PMCA report further states that:

'In addition to these are the talent pool (locally in Dunboyne as well as in Dublin Region – over 40% of those at work in Dunboyne settlement have third-level or higher educational attainment), the demographic structure of the population and the availability of housing locally – the National Competitiveness Council has recently highlighted the importance of affordable housing supply in the mix of activities that will make Ireland more attractive to inward investment.'

The PMCA report when commenting on the need for implementation of the Economic Strategy states that:

'The sustainability of the past model of development in County Meath has been called into question in funding submissions made by Meath County Council to the Department of the Environment, Community and Local Government as well as by the external consultants who put together the Economic Development Strategy for County Meath 2014-2022. The most recent submission – the Funding Submission by Meath County Council to the Department (17 July 2015) – highlighted the fact that the Council has been faced with an exceptionally rapid rise in its population but without an appropriate increase in the level of resources required to service the population.'

PMCA in the concluding remarks of their report summarise the strengths of the site from an economic perspective as follows:

- *'Infrastructure – including rail and other public transport infrastructure to support economic and employment development.*
- *Intellectual and policy machinery – in the forms of the Economic Development Strategy and the backing of the Meath Economic SPC and the Meath LCDC, and the Meath Economic Forum.*
- *Strategic planning – with the identification of five key strategic sites within the County that will drive economic development throughout the County (Dunboyne being one of the identified sites).*
- *Availability of serviced, zoned sites – including the lands under consideration.*
- *Clear evidence of investor interest – through recent IDA Ireland jobs announcements and the prospect of a major new IDA investment by Aramark in the said lands.'*

3.4.2 Regional Retail Development

The Draft Direction states that,

‘Retail development in Dunboyne is identified under the Retail Strategy for the Greater Dublin Area 2008-2016 as a Level 3 retail centre with the designation including a footnote that ‘Dunboyne will gradually develop over the next 20 years towards level 2 status’. On foot of this designation, the Dunboyne/Clonee/Pace LAP 2009 (Objective RET OBJ1) provided for the development of a new Level 2 retail centre at Pace. However, no development has occurred at this location since the designation and the subject lands remain undeveloped and Greenfield in nature. It is noted that the Retail Strategy for the GDA 2008-16 is to be reviewed by the Eastern and Midland Regional Assembly in the content of its preparation of a Regional Spatial and Economic Strategy (RSES) as the successor to the Regional Planning Guidelines for the Greater Dublin Area 2010-2022. This imminent strategy review will formally be adopted as policy for the region informing the development plan process for the county/city authorities in the region. The mechanism could potentially review the long term Level 2 retail designation at Dunboyne in light of its viability given its proximity to the established Level 2 Blanchardstown Centre in Fingal’

It further states that,

‘It would appear that the proposals in Variation No.3 for development at Pace are based on the regional retail designation that have now been inappropriately translated into separate isolated residential Objective A2 and employment Objective E1/E3’

The Chief Executive would reiterate the point that the current proposal for the lands are *not ‘based on the regional retail designation’* as inferred in the Draft Direction; rather it is based on the content of the Economic Development Strategy wherein the lands are identified as one of the 5 Key Strategic Sites in the County and involves a consideration of the most appropriate uses for the lands in question. The success of the Council’s strategic approach to fostering economic development, based on the recommendations and outcomes of the Economic Development Strategy, and the attractiveness of the Dunboyne North as an employment development location can be evidenced through recent high profile announcements of significant employment development in the area.

Shire, a large International company, announced earlier this year their intention to develop a manufacturing facility at Piercetown, in the immediate environs of Dunboyne North. The Shire facility will be active in bio-pharma manufacturing on a 120-acre site and will see 400 highly skilled jobs created in the area over the next four years, with an additional 700 jobs being created during the construction phase. The Shire announcement is the largest FDI jobs announcement by the IDA so far this year. Avoca has also announced plans to open its largest retail facility in Ireland at Dunboyne North. This will see the creation of 80 jobs. Furthermore, Aramark, which acquired Avoca in 2015, is planning to build a European operations centre, with an estimated 500+ jobs and are actively discussing a viable option on lands at the site next to the M3 Parkway Rail Station). These examples are a very clear demonstration of the attractiveness of the Dunboyne North area to major employers and is evidence that the Economic Development Strategy is already being successfully implemented.

The Draft Direction envisages that the lands would revert to their current zoning and related objectives for a Level 2 Centre (retail, residential, commercial uses etc...), and employment uses although it does infer that these objectives could in turn be removed following the review of the current Regional Planning Guidelines. Some concern would exist that the Draft Direction pre-empts the review of the Retail Strategy particularly given that the preparation of the Regional Spatial and Economic Strategy is a function of the Eastern and Midland Regional Assembly and not of the Department. The effect of the reversion to a Level 2 Centre and the uncertainty of the designation of the lands upon review of the RSES, as suggested by the Minister, is of concern. Given the importance to the economic prosperity of County Meath of fostering economic growth in locations such as Dunboyne North, which are now demonstrating an ability to attract and deliver major employment development, the Council is concerned that the resulting uncertainty will have an adverse impact on future investment in the area. In preparing Variation No.3 to the County Development Plan, the Chief Executive and the Elected Members of Meath County Council were satisfied that the plan and the variations thereto set out an appropriate overall strategy for the proper planning and sustainable development of the area. The changes proposed by the Minister in the Draft Direction i.e. the omission of a 'Live/Work' community in proximity to multi-modal transport networks and the return of the lands to the prior zoning for a Level 2 Centre as envisaged under Variation No.2 would not provide for an appropriate overall strategy for the development of the area.

The Draft Direction further states that,

'The planning authority (per the Report of the Chief Executive on submissions to the Draft Variation, February 2016) concludes that the residential and employment zonings at Pace equates to the concept of a rail-based 'live/work communities' in the SDZ Planning Schemes for Clonburris, Adamstown and Cherrywood in Dublin in proposed residential development at Pace. However, the Department considers that these large scale developments of 8,000+ new homes contiguous to the built up area of Dublin City are considered to be fundamentally different to the small scale proposed residential zoning at Pace which is in excess of 1.5km distant from the established town of Dunboyne and adjoining to an interchange on the M3'.

As per the Draft Direction the only difference between those settlements referenced and the subject lands relate to scale of development and a perceived distance from the 'established town'. Section 3.4.1 expresses the views of the Chief Executive in respect of the site location in Dunboyne. In terms of scale, the entire area of Dunboyne is planned to grow to a population of 25,000, and the overall lands around Dunboyne North/Pace will significantly contribute to this overall population in the fullness of time. These may ultimately be of a scale comparable to the settlements referred to in the Draft Direction over a longer time period as envisaged in the RPGs.

The live/work modal envisaged for the subject lands is centred on a concept of ensuring that employment, residential, educational and recreational are grouped thereby enhancing the quality of life for all and minimising unsustainable commuting patterns. The Economic Development Strategy for County Meath identified a number of trends within the County which were impacting on the economic performance of the County which included a significant FDI deficit. In preparing Variation No.3 it was acknowledged that FDI investment is particularly sensitive to the availability of housing, proximity to high quality recreational and cultural assets and a high quality of life. Meath County

Council, in adopting a pro-active approach to plan led mixed use development, providing for employment, residential, educational and recreational uses in an access rich environment within the Metropolitan Area, has positioned itself favourably to redress the FDI deficit and continue to contribute to the economic recovery.

Conclusion and Recommendation of the Chief Executive

As has been demonstrated above Variation No. 3 to the Meath County Development Plan 2013-2019 is of critical importance to realising the future sustainable planning and economic development of County Meath and is in accordance with the proper planning and sustainable development of the County.

The Variation is based on extensive and robust empirical evidence, as set out in detail in this report and as summarised below:

- The Economic Development Strategy for County Meath seeks to enable spatial planning to operate as a key driver in the delivery of primary economic objectives in the most efficient and appropriate way. The principle outcome of the process was to identify key strategic sites in higher order settlements to attempt to redress the prevailing unsustainable commuting patterns, 80% in this area. Dunboyne is identified as one of the 5 key strategic sites and the development of the 'live work' community will play a significant part in the economic regeneration of the area.
- Dunboyne is designated in the Regional Planning Guidelines to grow to 25,000 persons (Census 2016 preliminary results circa 10,000 persons). In order to realise the potential of the area as a metropolitan growth centre for sustainable living and employment, it is essential that housing, community facilities and employment are located in close proximity to each other in a manner which maximises investments in public transport and creates opportunities for greener travel. A core concept underlying growth for this area is developing the area as a low carbon zone.
- The consistent advice from the multi disciplinary consultancy team is that the 'live work' community model is compliant with the proper planning and sustainable development of the area and would enable maximum benefit to be made from the substantial national investment in largely under utilised multi modal transport infrastructure in the area. The Consultancy team also confirmed that the 'live work' community development model is one which has been successfully applied elsewhere in the Metropolitan Area.
- The 'live work' community will be master planned in a process that will be directly managed by professional planning staff. A key element of this supervised transparent process will be the requirement that employment development is front loaded and development can only proceed on that basis.

- The lands are located within the Metropolitan Area of the National Gateway. The proposed 'live work community' at Dunboyne North is fully compliant with all relevant National, Regional and Local Planning Policy.
- This area is already a preferred location for new business including IDA supported FDI seeking to establish in the county. Recent job announcements have included Avoca (80 retail and hospitality employees), Shire (400 biotech employees) and Facebook (110 data centre employees), which between them will support circa 2000 construction jobs. These new businesses compliment significant existing SME and indigenous development at Kilsaran, Bracetown Business Park, Hub Logistics and Dunboyne Business Park.

I respectfully recommend that the Draft Direction should not proceed and that Variation No. 3 should be confirmed.

Jackie Maguire

Chief Executive

Meath County Council

9th Day of August 2016

APPENDICES

APPENDIX A
MINISTERIAL LETTER AND DRAFT
DIRECTION



Comhshaol, Pobal agus Rialtas Áitiúil
Environment, Community and Local Government

Óifig an Aire
Office of the Minister

17 June 2016

For the Attention of: Jackie Maguire, Chief Executive, Meath County Council.

Jackie Maguire,
Chief Executive,
Meath County Council,
County Hall,
Navan,
Meath

**Section 31 of the Planning and Development Act 2000, as amended
by the Planning and Development (Amendment) Act 2010
Notice of Intent to Issue a Direction relating the
Meath County Development Plan 2013-2019**

Dear Chief Executive,

I am writing to you in connection with Variation No.3 to the Meath County Development Plan 2013-2019 as adopted by the Council on 23 May 2016 and request that you bring this notice to the attention of the elected members of the County Council on or before Friday 17 June 2016.

TAKE NOTICE that I am considering issuing a direction pursuant to Section 31 of the Planning and Development Act 2000, as amended. A draft of the proposed direction is attached to this letter. As appears therefrom, I have formed the provisional opinion (i) that the Planning Authority has ignored or not taken account of a submissions made on my behalf in January and April 2016 in respect of the draft Variation No.3 to the Meath County



Development Plan 2013-2019 and the proposed material alterations to the draft Variation No.3; (ii) that the plan as adopted is not in compliance with the requirements of s.12, s.13, s.20 and s.28 of the Planning and Development Act 2000, as amended.

The reasons for the proposed direction are set out in the attached draft direction.

BACKGROUND

My Department wrote to your Council, under my direction as statutory consultee under the Planning Acts, in relation to the draft Variation No.3 to the Meath County Development Plan 2013-2019 on 27 January 2016. and the proposed material alterations to the draft Variation No.3 to the Meath County Development Plan 2013-2019 on 19 April 2016.

The Council was advised to remove the proposed residential content/zoning at Pace, north of Dunboyne and ensure that there was proper traffic and transport assessment of all development policies in order for the proposals to accord fully with Ministerial Planning Guidelines issued under section 28 of the Planning and Development Acts, 2000-15.

Meath County Council was advised to take appropriate measures in the plan making process to address these specific non-compliant proposals identified by the Department and that failure to address the issues satisfactorily in line with its statutory and policy responsibilities could result in the Minister using the powers available to him under the Planning and Development Act to ensure that the relevant statutory and policy requirements are upheld.

Despite this, on 23 May 2016, the Elected Members voted by resolution to adopt the proposed Material Alterations, as previously placed on public display.

Accordingly I am issuing a draft Ministerial Direction under Section 31 of the Planning Act to direct Meath County Council, with regard to the Meath County Development Plan 2013-2019, as varied, not adhering to statutory and policy requirements, full details of which are set out in the Planning Advisors report (attached) and summarised below.

MEASURES PROPOSED UNDER THE DRAFT DIRECTION

In light of the foregoing, the plan, as adopted, which sets out the objectives for Meath is to be amended as set out in the attached draft direction.

Please note that the provisions of the draft direction will not now come into effect until the Section 31 procedure has been completed.

PROCEDURAL REQUIREMENTS

I would draw your attention to the public consultation obligations under Section 31 of the Planning and Development Act 2000, as amended by the Planning and Development Amendment) Act 2010, and the initial requirement for you, as manager, under section 31(7) to publish notice of the draft direction no later than 2 weeks after receipt of this notice. I look forward to receipt of the report which has to be prepared by you on foot of this public consultation under Section 31(8), including on any views of the elected members, to be furnished to me no later than 4 weeks after the public consultation process is completed, for my further consideration.

My officials are available to assist you, as necessary, in complying with the foregoing process now underway.

Yours sincerely,

Simon Coveney, T.D.,
Minister for Environment, Community and Local Government

Copied to:

Cathaoirleach, Meath County Council, County Hall, Navan, County Meath
Director, Eastern and Midland Regional Assembly

DRAFT DIRECTION

**DIRECTION IN THE MATTER OF SECTION 31
OF THE PLANNING AND DEVELOPMENT ACT 2000
(AS AMENDED BY S.21 OF THE PLANNING AND DEVELOPMENT
(AMENDMENT) ACT 2010)**

MEATH COUNTY DEVELOPMENT PLAN 2013-2019 DIRECTION 2016

“Development Plan” means the Meath County Development Plan 2013-2019

“The Planning Authority” means Meath County Council

WHEREAS the Minister for the Environment, Community and Local Government is, for the reasons set out in the Statement of Reasons hereto, of the Opinion that

- (i) Meath County Council in making the Meath County Development Plan 2013-2019 has ignored or has not taken sufficient account of the submissions made by the Minister for the Environment, Community and Local Government in January and April 2016,

and

- (ii) the Meath County Development Plan 2013-2019 is not in compliance with the requirements of s.12, s.13 and s.28 of the Planning and Development Act 2000 (as amended).

NOW, THEREFORE in exercise of the powers conferred on him by s.31 of the Planning and Development Act 2000 (as amended), the Minister of State at the Department of the Environment, Community and Local Government hereby directs as follows:

- (1) This Direction may be cited as the Planning and Development (Meath County Development Plan 2013-2019) Direction 2016.

(2) The County Council of Meath County is hereby directed to take the following steps with regard to the Meath County Development Plan 2013-2019 (“the development Plan”).

a. The map entitled ‘*County Development Plan 2013-2019 Variation No.3 Amendments – Dunboyne North – Dunboyne – Clonee - Land Use Zoning Objective Map*’ which sets out the zoning objectives for Dunboyne North – Dunboyne – Clonee in the Meath County Development Plan 2013-2019 is to be amended by removing:

i. The re-zoning of lands at Pace, north of Dunboyne for a mixture of uses including objective ‘A2’ (residential), objective ‘E1/E3’ (high technology/manufacturing/office) and objective ‘E3’ (logistics/warehousing)

and

ii. The Objectives ‘Dunboyne North OBJ1 and OBJ2’

For ease of reference a copy of the said map indicating lands outlined in a dashed red line is attached as Appendix A;

The effect of this amendment will be that the zoning objectives for lands identified in (a) above will revert to the zoning objective as per the Meath County Development Plan. For ease of reference a copy of the County Development Plan 2013-2019 Variation No.2, PACE, ‘*Land Use Zoning Objective Map*’ (May 2014) is attached as Appendix B.

b. The written text of Variation No.3 is to be amended by deleting that text related to I(a) & I(b) above for lands at Pace, North of Dunboyne.

STATEMENT OF REASONS

1. Written submissions was made to Meath County Council on behalf of the Minister for the Environment, Community and Local Government on 26 January 2016 on the Proposed Variation No.3 and on the 19 April 2016 on the material alterations to the variation which advised the Council to remove the proposed residential content/zoning at Pace, north of Dunboyne and ensure that there was proper traffic and transport assessment of all development policies in order for the proposals to accord fully with Ministerial Planning Guidelines issued under section 28 of the Planning and Development Acts, 2000-15.

Meath County Council was advised to address the issue satisfactorily in order to ensure compliance with the Minister's Guidelines.

Despite this, on 23rd May, the Elected Members voted by resolution to adopt Proposed Variation No. 3, as previously placed on public display.

A) Residential Zoning

The draft Variation No.3 seeks to create a new residential development of c. 500 homes at Pace and facilitate a 'developer-led masterplan' (per Objective Dunboyne North OBJ1). This proposed housing would be detached and distant from the existing urban area of Dunboyne and disconnected from the established social, community and other infrastructure of the town. A new residential zoning/development significantly to the north of the established town at Pace (1.5-2km away) would be a clear breach of the sequential approach to the zoning of lands identified in section 4.19 of the Development Plan Guidelines (2007) and reiterated in Sections 2.3 & 6.2 of the Local Area Plan Guidelines (2013). The planning guidelines on Development Plans state that zoning should 'extend out from the centre of an urban area, with undeveloped lands closest to the core and public transport routes being given preference (i.e. 'leapfrogging' to more remote areas should be avoided)' (section 4.19).

The proposed residential zoning in Variation No.3 would create an isolated development, physically remote from the established settlement of Dunboyne and would be contrary to the adopted County Development Plan core strategy for Dunboyne whereby new housing is to be constructed to the east and subsequently to the south of the town.

B) Employment Zoning

The Variation also seeks to provide for Objective E1/E3 and E3 zonings of the Meath County Development Plan 2013 – 2019 on development lands at Pace which would allow these lands to be developed for the high technology/office/logistics employment uses as permitted in the Plan.

These proposed employment zonings, in tandem with the proposed residential zoning, are positioned either side of the R157 and is in close proximity to Junction 5 on the M3 motorway. The planning guidelines on Spatial Planning and National Roads (2012) under section 2.7 emphasize that there must be an evidence base to such development proposals in the vicinity of motorway interchanges. A comprehensive traffic assessment of such proposals to ensure the avoidance any adverse impact on the national road infrastructure must be provided to this end. Development proposals must demonstrate, inter alia, consistency with the relevant development policy/strategy including the National Spatial Strategy and Regional Planning Guidelines.

Variation No.3 was not accompanied by a traffic impact assessment or similar evidence basis to determine that there will be no adverse impact on the operation of the adjoining M3 motorway infrastructure. The Department is aware that that there is a transport study underway (Aecom Transport Consultants) jointly by Meath County Council, Fingal County Council and Transport Infrastructure Ireland that is examining the capacity and operation of M3 junctions/interchanges. This study is not completed however, and has therefore not informed the consideration of the proposed residential and employment zonings at Pace as required by the Spatial Planning and National Roads Guidelines.

The Department considers that the approach required by the Spatial Planning and National Roads Guidelines has not been followed in Variation No.3 and the zoning has the potential to generate traffic volumes to limit the operation of the nearby national motorway interchange.

C) Regional Retail Development

Retail development in Dunboyne is identified under the Retail Strategy for the GDA 2008-16 as a Level 3 retail centre with the designation including a footnote that '*Dunboyne will gradually develop over the next 20 years towards level 2 status*'. On foot of this

designation, the Dunboyne/Clonee/Pace LAP 2009 (Objective RET OBJ1) provided for the development of a new Level 2 retail centre at Pace.

However, no development has occurred at this location since the designation and the subject lands remain undeveloped and greenfield in nature. It is noted that the Retail Strategy for the GDA 2008-16 is to be reviewed by the Eastern and Midland Regional Assembly in the context of its preparation of a Regional Spatial and Economic Strategy (RSES) as the successor to the Regional Planning Guidelines for the Greater Dublin Area 210-2022. This imminent strategy review will formally be adopted as policy for the region informing the development plan process for the county/city authorities in the region. The mechanism could potentially review the long term Level 2 retail designation at Dunboyne in light of its viability given its proximity to the established Level 2 Blanchardstown Centre in Fingal.

It would appear that the proposals in Variation No.3 for development at Pace are based on the regional retail designation that have now been inappropriately translated into separate isolated residential Objective 'A2' and employment Objective E1/E3 zonings.

The planning authority (per the Report of the Chief Executive on submissions to the Draft Variation, February 2016) concludes that the residential and employment zonings at Pace equates to the concept of a rail-based 'live/work communities' in the SDZ Planning Schemes for Clonburris, Adamstown and Cherrywood in Dublin in proposed residential development at Pace. However, the Department considers that these large scale developments of 8,000+ new homes contiguous to the built up area of Dublin city are considered to be fundamentally different to the small scale proposed residential zoning at Pace which is in excess of 1.5km distant from the established town of Dunboyne and adjoining to an interchange on the M3.

In light of the above the Minister is of the opinion that the Planning Authority has ignored, or has not taken sufficient account of the said written submission, in that the Planning Authority proceeded to adopt a policy objective which would be inconsistent with national Government policy (the Local Area Plans Guidelines (2013), the Spatial Planning and National Roads Guidelines (2012) and the Development Plans Guidelines (2007)) and the

requirements of section 19(2) of the Planning & Development Acts, 2000-15 as it is not consistent with the core strategy of the Meath County Development Plan 2013-2019.

2. The decision by the members to alter the policy in regard to the zoning objectives as outlined in this direction do not provide for proper planning and sustainable development and therefore the Meath County Development Plan 2013-2019, as varied, is not in compliance with the requirements of s.12, s.13, s.20 and s.28 of the Planning and Development Act 2000 (as amended).

GIVEN under my hand,

Minister for Environment, Community and Local Government

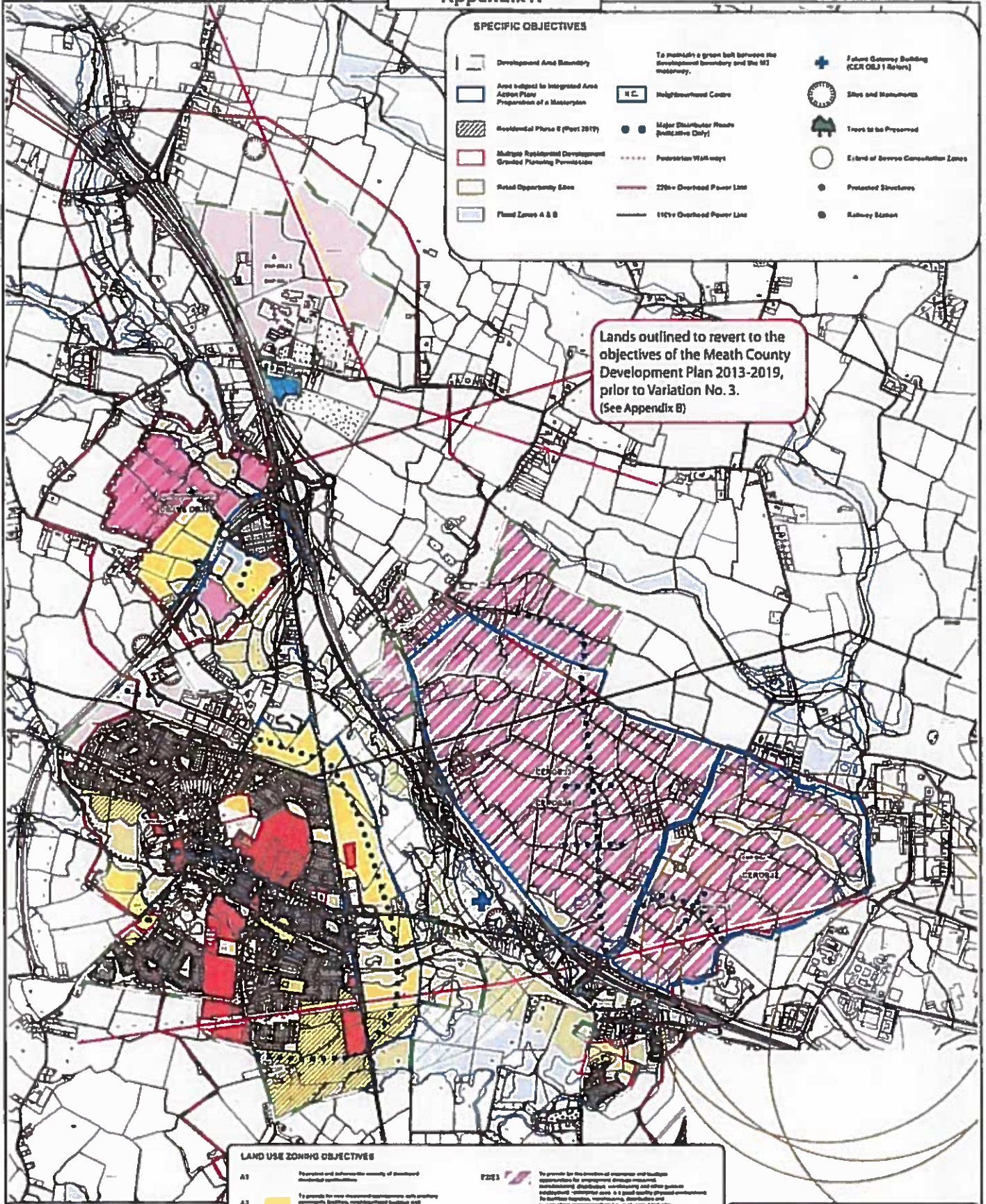
this day of June 2016.

Appendix A

SPECIFIC OBJECTIVES

- Development Area Boundary
- Area Subject to Integrated Area Action Plan Preparation of a Masterplan
- Residential Phase 2 (Post 2019)
- Multiple Registered Development Granted Planning Permission
- Retail Opportunity Sites
- Flood Zones A & B
- To maintain a green belt between the development boundary and the M3 motorway.
- Neighbourhood Centre
- Major Station/Road (Indicative Only)
- Pedestrian Walkways
- 220kv Overhead Power Line
- 110kv Overhead Power Line
- Future Gateway Building (CER OLS 1 Return)
- Sites and Monuments
- Trees to be Preserved
- Extent of Service Consultation Zones
- Protected Structures
- Railway Station

Lands outlined to revert to the objectives of the Meath County Development Plan 2013-2019, prior to Variation No. 3. (See Appendix B)



LAND USE ZONING OBJECTIVES	
A1	To provide for the residential and commercial viability of residential areas.
A2	To provide for the use of residential areas with primary amenity, including residential, commercial and employment uses as permitted elsewhere in the map of the county in the National Planning Framework.
B1	To provide for the use of residential areas with primary amenity, including residential, commercial and employment uses as permitted elsewhere in the map of the county in the National Planning Framework.
B2	To provide for the development of a small business zone.
C1	To provide for the use of residential areas with primary amenity, including residential, commercial and employment uses as permitted elsewhere in the map of the county in the National Planning Framework.
E1/E2	To provide for the use of residential areas with primary amenity, including residential, commercial and employment uses as permitted elsewhere in the map of the county in the National Planning Framework.
E3	To provide for the use of residential areas with primary amenity, including residential, commercial and employment uses as permitted elsewhere in the map of the county in the National Planning Framework.
F2/E3	To provide for the use of residential areas with primary amenity, including residential, commercial and employment uses as permitted elsewhere in the map of the county in the National Planning Framework.
G1	To provide for the use of residential areas with primary amenity, including residential, commercial and employment uses as permitted elsewhere in the map of the county in the National Planning Framework.
G2	To provide for the use of residential areas with primary amenity, including residential, commercial and employment uses as permitted elsewhere in the map of the county in the National Planning Framework.
H1	To provide for the use of residential areas with primary amenity, including residential, commercial and employment uses as permitted elsewhere in the map of the county in the National Planning Framework.
H2	To provide for the use of residential areas with primary amenity, including residential, commercial and employment uses as permitted elsewhere in the map of the county in the National Planning Framework.

Note: Details shown on this map are for information purposes only. Further details on any area should be obtained from Meath County Council. This map has been produced by Meath County Council with assistance from the Local Authorities and Ordnance Survey data.

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Client: Planning Department, Meath County Council, Borough House, Dunboyne, Co. Meath. Tel: (044) 909 7000. Fax: (044) 909 7001. Email: planning@meathcoco.ie. Web: www.meathcoco.ie

comhairle chontae na mí
meath county council

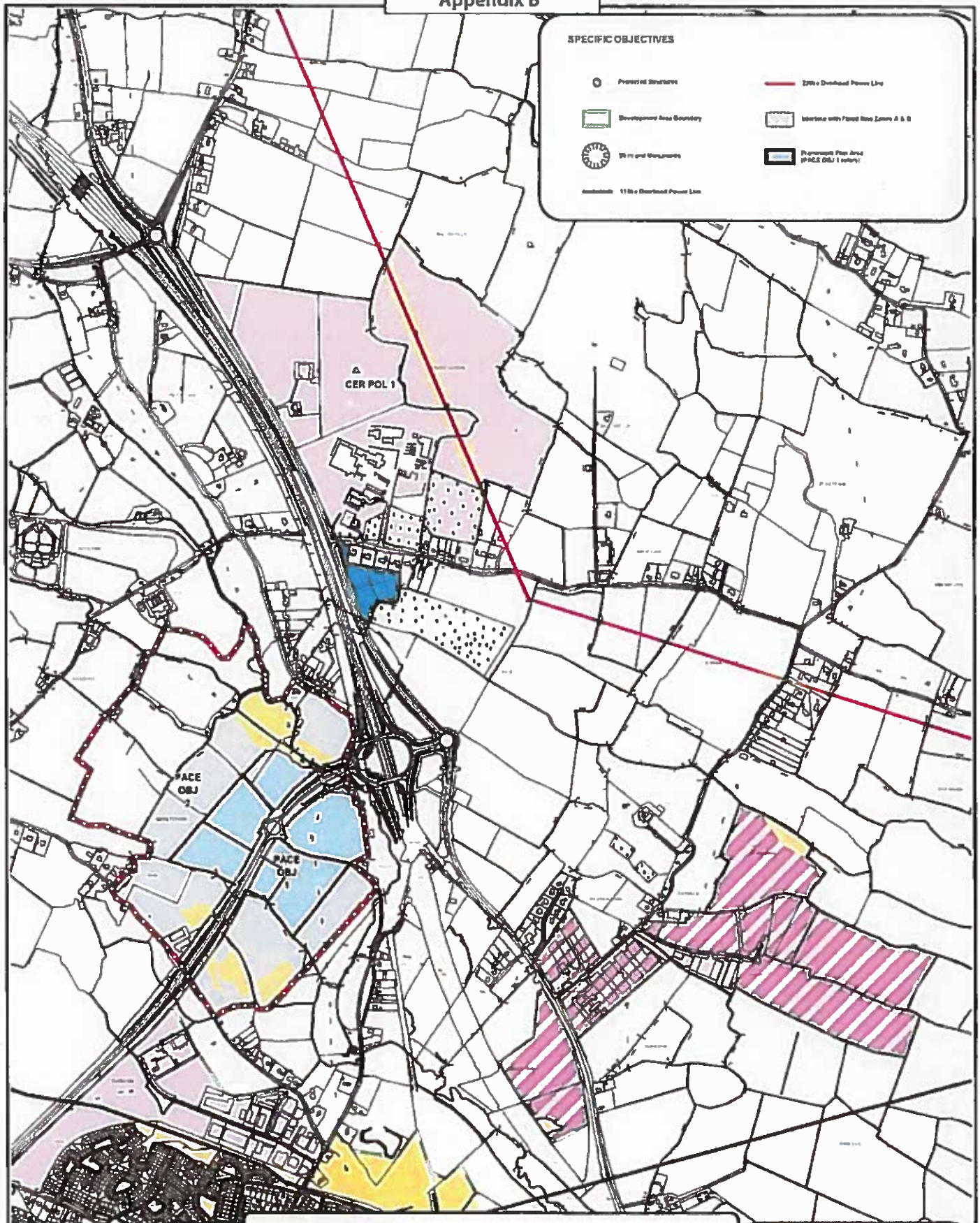
County Development Plan
2013-2019
Variation No. 3 Amendments

DUNBOYNE NORTH - DUNBOYNE - CLONEE

Land Use Zoning Objectives Map

VARIATION 3 AMENDMENTS

Appendix B



SPECIFIC OBJECTIVES

- Protected Structures
- Development Area Boundary
- Walls and Menageries
- 220kV Overhead Power Line
- Interface with Flood Risk Zones A & B
- Planning Plan Area (PACE OBJ) (yellow)

LAND USE ZONING OBJECTIVES

A1	To protect and enhance the security of developed residential communities.	E3	To facilitate liquidity, warehousing, distribution and supply chain management facilities at related industry facilities which would provide a good access to the major road network.
A2	To provide for new residential communities with ancillary community facilities, neighbourhood facilities and development with all completed approvals for the status of the scheme on the Salsford locality.	F1	To provide for and shaped open spaces for active and passive recreational activities.
B2	To provide for the development of a retail residential park.	WL	To protect at-risk lands from inappropriate forms of development which would impact the safety exposure of a strategic urban centre.
E2	To provide for the creation of enterprise and flexible opportunities for employment through industrial, manufacturing, distribution, warehousing and other general employment/retail uses in a good quality physical environment.		

Note: Certain parts on this map are for information purposes only. Details on any drawings should be checked with the County Council. This map has been prepared by South County Council with assistance from Land Authority and Ordnance Survey data. © Ordnance Survey Ireland & Department of Lands, Maritime & Survey. NOTE: UNAUTHORISED REPRODUCTION OF THIS MAP IS PROHIBITED.

Contact: Planning Department, South County Council, Abbey Road, Naas, Co. Meath. Tel: 01454 888700. Fax: 01454 888701. Email: planning@scoco.ie or www.southcountycouncil.ie

Scale: 1:50,000. Produced by: 08/2014

comhairle chontae na mídeach county council
County Development Plan 2013-2019
Variation No. 2
PACE
Land Use Zoning Objectives Map
VARIATION MADE on the 19th May 2014

APPENDIX B
SCHEDULE OF SUBMISSIONS

Submission Number	Name
1	Director of the Regional Assembly
2	Aramark Ireland
3	Cliona Ryan, Property Resource Planning Management & Development on behalf of Glenbeigh Construction Ltd
4	RPS Planning and Environment on behalf of Godolphin Ireland Unlimited Company.
5	South East Meath Chamber of Commerce
6	Declan Brassil on behalf of McGarrell Reilly Group
7	Cllr Maria Murphy, Cathaoirleach Meath County Council on behalf of the Elected Members of Meath County Council
8	Cllr Gillian Toole, Cathaoirleach Ratoath Municipal District Meath County Council on behalf of the Elected Members of Ratoath Municipal District Meath County Council

1001

Louise Heeney

From: Info [info@emra.ie]
Sent: 12 July 2016 16:37
To: variation3mcdp
Subject: Submission 1001 - EMRA (Meath County Development Plan 2013-2019 Variation No 3 – Draft Direction)
Attachments: 160108_MeathCoCo CDP Var No.3 DRAFT.pdf; 1600711_Meath CoCo CDP Var No 3 _Response to Draft Direction.pdf

For the Attention of: Jackie Maguire, Chief Executive, Meath County Council

Draft Direction in the matter of section 31 of the Planning and Development Act 2000 (as amended) LANDS AT PACE, NORTH DUNBOYNE

Dear Chief Executive,

Further to the Draft Direction in the matter of section 31 of the Planning and Development Act 2000 (as amended) LANDS AT PACE, NORTH DUNBOYNE, which is currently on public display, please find attached observations from the Eastern and Midland Regional Assembly.

I would appreciate if you could acknowledge receipt of this email.

Yours Sincerely,



Jim Conway
Director
Eastern and Midland Regional Assembly

12th July 2016



Tionól Reigiúnach Oirthir agus Lar-Tíre
Eastern and Midland Regional Assembly

Tionól Reigiúnach Oirthir agus Lar-Tíre | Ballymun Civic Centre | Main Street | Ballymun | Dublin 9
3rd Floor North | Ballymun Civic Centre | Main Street | Ballymun | Dublin 9



Proposed Draft Variation No. 3 of the Meath County Development Plan 2013- 2019

This submission on the draft variation No. 3 of the Meath County Development Plan 2013 – 2019 has been reviewed by the Eastern and Midland Regional Assembly at the meeting of 15th January 2016.

The Assembly members from Meath County Council are not supportive of this submission and the members of the Assembly recognize that all the members of Meath County Council supported the proposed draft variation as placed on display.

INTRODUCTION

As set out in the Action Programme for Effective Government and under the Local Government Reform Act 2014 the former eight Regional Authorities and two Regional Assemblies have been replaced by three new Regional Assemblies. The Local Government Act 1991 (Regional Assemblies) (Establishment) Order 2014 (S.I. 573 of 2014) came into effect on the 1st January 2015 establishing the new Regional Assemblies; the Northern and Western, the Eastern and Midland, and the Southern. The Eastern and Midland Regional Assembly, has twelve constituent local authorities split into three Strategic Planning Areas, as follows -

Dublin	Fingal, Dublin City, South Dublin, Dún Laoghaire-Rathdown
Eastern	Louth, Kildare, Meath, Wicklow
Midlands	Longford, Laois, Offaly, Westmeath

Note: Louth is located in the Border NUTS III area but is now moving to the Eastern and Midland assembly region from the former BMW region.

The function of the new Regional Assemblies are the formulation, adoption and implementation of Regional Spatial and Economic Strategies (which will replace the existing Regional Planning Guidelines), management of EU Operation Programs, EU project participation, implementation of national economic policy, and additional functions through working with the new National Oversight and Audit Commission.

With regard to the Regional Spatial and Economic Strategies (RSES) which are to replace the Regional Planning Guidelines (RPGs) 2010 - 2022, the Local Government Reform Act 2014 (which amends the Planning and Development Act 2000) Sec.23. (1) states "The objective of regional spatial and economic strategies shall be to support the implementation of the National Spatial Strategy and the economic policies and objectives of the Government by providing a long-term strategic planning and economic framework for the development of the region for which the strategies are prepared which shall be consistent with the National Spatial Strategy and the economic policies or objectives of the Government."

Furthermore it should be noted that the current status of the RPGs 2010 - 2022 is enshrined in the Local Government Reform Act 2014 Sec.63. (4) "Notwithstanding any other provision of this Act, the regional planning guidelines prepared by a dissolved regional authority and published in respect of the period 2010 to 2022, shall continue to have effect as if made under this Part until a regional spatial and economic strategy is prepared and adopted by the regional assembly concerned."

LEGISLATIVE CONTEXT

Under Section 27C of the Planning & Development Act, 2000 (as inserted by Section 18 of the Planning and Development Act, 2010) the Eastern and Midlands Regional Assembly, as the successor regional assembly of the dissolved Dublin and Mid-East Regional Authorities, is obliged to prepare submissions / observations to be submitted to the relevant planning authority and copied to the Minister for the Environment, Community and Local Government.

A submission shall contain a report which shall state whether, in the opinion of the Regional Assembly, the draft variation of the Development Plan, and in particular its core strategy are consistent with the Regional Planning Guidelines in force for the area of the Development Plan. If, in the opinion of the Regional Assembly the proposed variation of the Development Plan, and its core strategy are not consistent with the RPGs, the submission / observations and report shall include recommendations as to what amendments, in the opinion of the Regional Assembly, are required to ensure that they are consistent.

This report contains the opinion of the Eastern and Midland Regional Assembly in relation to the above matters along with recommendations as required under Section 27C of the Planning and Development Act 2000 as amended.

SUBMISSION

The Regional Assembly recognizes the approach of the Local Authority to implement the Economic Development Strategy for County Meath 2014-2022 and to integrate the relevant aspects of the strategy in to the Meath County Development Plan 2013 (CDP). It is recognized that the local authority is performing its enhanced economic role as required under the Local Government Reform Act 2014, which provided a stronger, clearer role for local government in economic and community development. The Local Community and Economic Plans (LECPs) introduced in the Local Government Reform Act 2014 are a central component of the local authority's role in economic and community development. In the preparation and formulation

of the LECP for County Meath significant aspects of the Economic Development Strategy could be incorporated and expressed in the objectives and actions of the LECP.

The Regional Assembly has a statutory function in the preparation of the LECPs to ensure consistency in the first instance with the Regional Planning Guidelines (RPGs) and subsequently with their successor, the Regional Spatial and Economic Strategies, and also consistency with the core strategy of the County Development Plan.

Variation

The proposed variation to the County Development Plan is extensive in nature, covers all sections of the current County Development Plan and follows on from the previous 2no. variations to the County Development Plan and incorporates some legacy aspects from these variations. Due to these factors the variation as presented is somewhat unwieldy and would benefit from brevity and clarity to assist the public in understanding the breadth of the proposals and to facilitate engagement during the statutory process.

Economic Strategy

The Regional Assembly recognizes a key challenge in the Economic Development Strategy is to ensure more jobs are available within Meath to its residents and to broaden the economic base of the county. The Assembly welcomes the approach of the strategy to accord with the RPGs for the GDA in the location of employment zoned lands in the County, in this regard Strategic Policy EP2 of the RPGs states *"To seek sustainable economic growth across the GDA, by the promotion of identified core economic areas across the GDA in both the Dublin and Mid East Regions to facilitate new employment opportunities for existing populations and seek to reduce the volume of unsustainable long distance commuting."*

Settlement Hierarchy

With regard to consistency with the Regional Planning Guidelines (RPGs) for the GDA, there are aspects of the proposed variation that may be considered a departure from the policies of the RPGs. The proposals to seek a change the designation of the settlements of Stamullen and Enfield in the hierarchy expressed in the Core Strategy Table 2.1 in the CDP (which is currently

aligned with the RPG settlement hierarchy) is of concern, and changes to this designation in this hierarchy should not occur in isolation with regard to the wider Greater Dublin Area. A review of the settlement hierarchy will be performed in the upcoming RPG review and preparation of a Regional Spatial and Economic Strategy (RSES) for the region. This will allow for a holistic assessment of the settlement hierarchy in the region using an evidence based approach and directed by emerging national policy in the upcoming National Planning Framework. Any change in the designation of settlements in the region should only be considered in these circumstances.

Key strategic sites

The RPGs set out the regional policy parameters and key principles for the direction of economic growth in the Greater Dublin Area (GDA). Strategic Recommendation ER3 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 Economic Development Strategy for Meath 2014-2022 identified 5 key strategic employment sites in the County to target employment generation, which form part of this proposed variation to the CDP. The proposals for Navan, South Drogheda, Kells, and to some extent Ashbourne relate to further expansion of existing employment generating areas in the form of business parks and are generally supported in the Economic Strategy in Chapter 3 of the RPGs. Navan /Kells and Drogheda are designated as Primary Economic Towns and Ashbourne / Dunboyne is identified as a Secondary Economic Town in the RPG Economic Strategy for the GDA.

As part of the proposed variation there are significant proposals for Dunboyne to develop with triangulated nodes, two of these nodes based around the existing town centre and Dunboyne Rail station are appropriate and sustainably located in accordance with RPG policies of development and consolidation of existing urban areas. However the emerging proposal of a *“sustainable live work community”* at Dunboyne North around the M3 parkway does not

accord with these policies and would require revision. Proposals to create an “employment hub” with retail were included in previous planning policy by the local authority at this location on a reduced quantum of land.

Current expanded proposals to create a new community/settlement at this greenfield location with 500 units (max.) a neighbourhood centre with retail and associated services as well as the extensive employment uses, is lacking sufficient policy support in the RPGs and the relevant evidence based analysis to support such expansive proposals. In particular the proposals to include 500 residential units at this location, justified by the loss of 641 committed units since 2013 across the county (in the revision of Table 2.5 in the core strategy) are not warranted.

Additional employment zoned lands

The aspect of this variation to remove the phasing elements from the economic zoned lands in the county has led to significant lands in some 16 settlements now being available for development in the lifetime of this plan. A significant proportion of these lands may not be located in the most central locations and would not be considered the most sequential form of development for these settlements. These sites had been previously identified as long term strategic land banks in the 2013 Development Plan Order of Priority phasing and indicated for development post 2019 (the next CDP cycle). To now propose these lands for development in the current plan cycle, without rationale could be considered a retrograde step in plan making policy and phasing of development lands in the county. These proposals are further exacerbated by the proposed variations to the White Lands zoning objective allowing them to be released for development during the plan period. This further erodes the progress achieved in the 2013 Development Plan process and the core strategy, in rationalizing the land use zonings in the County.

The significant additional employment zoning proposed in the Clonee/Portan area taken in conjunction with the significant additional employment zoned land that form part of this proposed variation, is difficult to justify in the absence of an evidence based analysis and approach, as required in a CDP core strategy.

The current County Development Plan provided some analysis of available zoned employment generating land in chapter 4 of the CDP, and in this regard the proposed removal of table 4.1 and the associated narrative on these lands, further lessens the rationale for the inclusion of long term strategic employment lands in this development plan cycle.

CONCLUSION

This submission was prepared by the Assistant Director and approved by the members of the Regional Assembly, and the Assembly welcomes further opportunities to engage in the statutory process of the proposed Variation of the Meath County Development Plan.

Regards,



Jim Conway

Director

Eastern and Midland Regional Assembly

19th January 2016



Tionól Reigiúna h Oirthir agus Lár-Tíre
Eastern and Midland Regional Assembly

3rd Floor North | Ballymun Civic Centre | Main Street | Ballymun | Dublin 9



**Section 31 of the Planning and Development Act 2000 as amended.
Notice of Intent to Issue a direction relation the Meath County
Development Plan 2013 – 2019**

These comments are issued by the Director of the Regional Assembly in response to the Draft Direction pursuant to section 31 of the Planning and Development Act 2000 as amended on the Draft Variation No.3 of the Meath County Development Plan 2013-2019, which was issued on the 17th June and placed on public display on 27th June 2016.

Context

It is firstly important to note that as per the EMRA's previous submission issued to Meath County Council dated 15th January 2016, with respect to Draft Variation No. 3 of the Meath County Development Plan, the EMRA acknowledge the efforts of Meath County Council to promote the enhanced economic role of Meath as required under the Local Government Reform Act 2014.

Notwithstanding this and the publication of the subsequent Material Alterations of Variation No. 3, the EMRA continue to have concerns with regard to the draft variation and consider that the matters raised by the Assembly in their submission of 15th January 2016, issued under Section 27 of the Planning and Development Act 2000 as amended, were not fully addressed by the planning authority in the adopted variation.

New Housing and Employment Lands at Pace, North Dunboyne.

The Regional Planning Guidelines for the Greater Dublin Area 2010-2022 set out the regional policy parameters and key principles for the direction of economic growth in the Greater Dublin Area (GDA). Strategic Recommendation ER3 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.”

Ashbourne / Dunboyne is identified as a Secondary Economic Town in the RPG Economic Strategy for the GDA, Dunboyne is defined as a Large Growth Town II and also enjoys a level 2 retail designation.

The submission of the EMRA (15th January 2016) identified concerns relating to the proposal of a “sustainable live work community” at Pace, North Dunboyne around the M3 Parkway.

The draft variation proposals to create a new community/settlement at this greenfield location with 500 units (max.) a neighbourhood centre with retail and associated services as well as the extensive employment uses, are lacking sufficient policy support in the RPGs and the relevant evidence based analysis to support such expansive proposals.

The existing growth pattern for Dunboyne identifies that growth is to occur to the east and south of the town in a sequential manner that consolidates the existing town fabric, strengthening linkages with the local train station at Dunboyne, thus aiding the long term sustainable development of the settlement.

Contrary to this adopted growth strategy for Dunboyne, EMRA remain concerned that this variation as proposed amounts to the creation of a new community and economic development site at a greenfield location that is remote and detached from the existing urban fabric of Dunboyne and its associated supporting services that residents require.

Having regard to the above, it is considered that the designation of development lands at ‘Dunboyne North’/Pace is lacking sufficient policy support in the RPGs and the relevant evidence based analysis to support such expansive proposals.

Conclusion

This submission was prepared by the Assistant Director and approved by the Director of the Assembly. For reference, enclosed is a copy of the previous Regional Assembly submission under Section 27 C of the Planning and Development Act 2000 as amended.

Regards,



Jim Conway
Director
Eastern and Midland Regional Assembly

12th July 2016

Encl. EMRA submission to Draft Variation No 3. 15/01/2016

Louise Heeney

From: Wendy Bagnall
Sent: 13 July 2016 11:00
To: Louise Heeney
Subject: Submission 1002 Amarark ([CASE:44788] CE - PLAN - GEN - Aramark Ireland - Corres - Meath County Development Plan 2013-2019 Variation no. 3)
Attachments: PLAN - Corres - Aramark - Meath County Development Plan 2013-2019 Variation no. 3 - 2016.07.11.pdf

For your attention sub re draft direction

Sent from my Samsung device

----- Original message -----

From: Margaret Carroll <mcarroll@meathcoco.ie>
Date: 13/07/2016 10:40 AM (GMT+00:00)
To: Kevin Stewart <KStewart@meathcoco.ie>, Des Foley <DFoley@meathcoco.ie>, Michael Griffin <MGriffin@meathcoco.ie>, Patrick Gallagher <PGallagher@meathcoco.ie>, Wendy Bagnall <wbagnall@meathcoco.ie>
Subject: [CASE:44788] CE - PLAN - GEN - Aramark Ireland - Corres - Meath County Development Plan 2013-2019 Variation no. 3

All,

Attached correspondence from Aramark is referred for your information and/or attention.

Regards

Margaret

Margaret Carroll, Corporate Services, Meath County Council,

Railway Street, Navan, Co. Meath

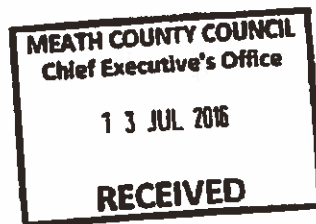
Tel: 046/9097013 Fax: 046/9097001

email: mcarroll@meathcoco.ie

web: www.meathcoco.ie

11th July 2016

Ms Jackie Maguire
Chief Executive
Meath County Council
County Hall
Railway St
Navan
Co Meath
C15 AW81



Re: Meath County Development Plan 2013-2019 Variation no. 3.

Dear Ms Maguire

The Draft Direction issued by the Minister for Environment seeks to remove the mix of uses including objectives A2 (residential) and E1/E3 (high technology / manufacturing / office) from lands at North Dunboyne.

The Aramark Corporation are a leading global provider of food, facilities, property services, and uniform services to education, healthcare, business and industry, and sports, leisure and corrections clients, with 270,000 employees worldwide. Our mission is to deliver experiences that enrich and nourish lives.

We are currently looking at a number of location to establish a Northern European Headquarters building for the Corporation and are actively in discussions with regard to a viable option at the Lands North of Dunboyne.

There are a number of locations that are competing for our business which would need to satisfy our requirements, including;

- Close to Dublin City
- Close to Dublin Airport
- Mix of uses that create a vibrant location for staff and customers
- Accessibility and public transport
- Profile office occupation
- 50,000 sq ft ideally in one building.
- High capacity utilities including Broadband.
- Attractive environment
- Proximity to other business interests including, Avoca brand.

We are currently undertaking a significant investment in Dunboyne to establish an Avoca outlet adjacent to the proposed Shires facility at Piersetown. This site enjoys excellent connectivity to the lands at North Dunboyne which enhances the attractiveness of the location as a potential location for our European HQ building.

We have been presented with a layout and plan for the Lands at Dunboyne and regard it as an attractive option for our business, however on the basis of the uncertainty created if the lands were rezoned as proposed in the Draft Directive, we would not be in a position to carry this option forward for our business

Aramark Ireland

T 01 816 0700 F 01 816 0730 | Northern Cross, Malah de Road, Dublin 17



Directors: Donal O'Brien, Frank Gleeson, Thomas Mulyan
Registered in Ireland? No 128403 Registered Address: 70 Sir John Rogerson's Quay, Dublin 2
Campbell Catering Limited trading as Aramark Ireland

www.aramark.ie



In order to create a location that reflects the corporate appeal of this business we will seek a building that reflects our core principles and demonstrates that to our customers and stakeholders.

A mono use location would not deliver this for us and is a barrier to recruitment of employees which are a key asset to our success.

We are supportive of the Council's vision for Dunboyne, in variation 3, and would remain an attractive option for us, if retained, as it combined the living and working community within the town with highly accessible transport and broadband services.

Yours sincerely



Donal O'Brien

Aramark Ireland

T 01 816 0700 F 01 816 0730 Northern Cross, Malahide Road, Dublin 17



Directors: Donal O'Brien, Frank Gleeson, Thomas Mulryon
Registered in Ireland No. 128403 Registered Address: 70 Sir John Rogerson's Quay Dublin 2
Carnobell Catering Limited trading as Aramark Ireland

www.aramark.ie

Louise Heeney

From: Cliona Ryan [cliona@planex.ie]
Sent: 13 July 2016 11:07
To: variation3mcdp
Subject: Submission 1003 Glenbeigh (Meath County Development Plan 2013-2019 Variation No 3 - Draft Direction)
Attachments: 22.24.2016_FINAL.1 Draft submission_GB.pdf

Dear Mr. Clarke,

Please find attached a submission on behalf of Glenbeigh in respect of the draft Ministerial Order on Variation No. 3 of the Meath County Development Plan 2013 – 2019.

We would be grateful for an acknowledgment of receipt of this submission by return and will contact your office in this regard.

Regards,

Cliona Ryan

Tel: 00353 1 6770273

Mob: 00353 86 3805515

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Seán Clarke, Administrative Officer
Planning Department
Meath County Council
Buvinda House
Dublin Road
Navan
Co. Meath

70 Glengarriff Parade
Phibsborough
Dublin 7

By Email: variation3mcdp@meathcoco.ie
Our Ref. 22.24.2016

13th July 2016

RE: Meath County Development Plan 2013-2019 Variation No 3 – Draft Direction

Dear Mr. Clarke,

This submission is made on behalf of Glenbeigh Construction Ltd., Damastown Way, Damastown Business Park Dublin 15.

1.0 BACKGROUND TO SUBMISSION

Glenbeigh are experienced property developers, successfully in the building business for three decades. For over a decade Glenbeigh have held and maintained a serviced, accessible and residentially zoned strategic landbank located on the Rooske Road in Dunboyne. As indicated in their submission to Variation no. 2 of the County Development Plan 2013 – 2019, Glenbeigh had intended to seek planning permission in 2014 to build immediately on foot of that permission.

Variation No. 2 of the current Development Plan which came into effect in January 2013, was made in May 2014, and altered the land use zoning of the subject lands as ascribed under the Dunboyne – Clonee – Pace Local Area Plan (LAP) 2009 – 2015 from A4 to A2 *“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.”*

Variation no. 2 also altered the development potential of the lands via a mapped objective; overlaying cross-hatching on the residential land use zoning objective to indicate that the lands are *“Residential Phase II (Post 2019).”*

Variation no. 2 of the current County Plan was later codified by amendment to the Dunboyne – Clonee – Pace LAP 2009 – 2015 advertised in December 2014 and made in March 2015. Under the current Development Plan the Dunboyne – Clonee – Pace LAP 2009 – 2015 is stated to be one of 5 no. LAPs to be retained in the county where 34 no. existed. Twenty nine of the existing LAPs were revoked at the time of the making amendment reflecting the phasing of residentially zoned lands for the 5 no. retained LAPs.

Prior to the adoption of Variation No. 2 and its codification into the Dunboyne-Clonee-Pace LAP a planning application for residential development of the subject lands would have been rejected on the basis that it materially contravened the County Development Plan, (Section 2.3.3) *“...that all proposals for residential developments on greenfield lands zoned “A” shall be premature pending this amendment of, first the Development Plan, and then the relevant LAP.”*

Today, more than three and half years after the adoption of the County Development Plan a planning application on the subject lands compliant with land use zoning and other objectives and standards of the Development Plan and LAP will be rejected by the Council on the basis that Phase II lands will not be considered for a grant of planning permission until 2019. Variation No 2 states *"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."*

The alteration to the Dunboyne-Clonee-Pace LAP that Variation No. 2 of the Development Plan wrought further restates the rejection of any planning application on the subject lands via Strategic Policy 1 (ii) *"The lands identified with an A2 'New Residential' land use zoning objective but qualified as 'Residential Phase II (Post 2019)' are not available for residential development within the life of this Development Plan."*

These policies have been implemented by the local authority via rejection of planning applications for Phase II lands having the effect that Phase II residentially zoned lands, at this time, cannot even now seek planning permission in order to be 'shovel ready' at 2019. This division between planning permission and actual development as a means of adjudging the development progression of Dunboyne is the focus of much of this submission.

We submit that the Council, in phasing residential development of lands has done so on the basis of planning permissions with no consideration of actual development levels. By rejecting planning applications on lands such as the subject site the council has not only not delivered the households anticipated over the current plan period but will delay development in the next County Plan period 2019 – 2025 for reason of common delays between planning applications and actual development.

Following Variation nos. 1 and 2 of the current County Plan and then the rationalisations and variations of the LAPs the County Plan itself states that its next priority was to review the existing 5 no. LAPs for the main settlements in the county. This review has not occurred and has been supplanted by Variation No. 3 which rezoned lands throughout the county for employment use based on recommendations in the 2014 – 2020 Economic Development Strategy.

2.0 VARIATION NO. 3

Variation no. 3 of the current County Development Plan was made in May 2016, following initial advertisement toward the end of December 2015. Amendments to the Variation were advertised in March 2016.

This submission, in response to the draft Ministerial Direction on Variation No. 3 focuses on Dunboyne and the rezoning of lands at Dunboyne North and Pace now part of the LAP for Dunboyne. In summary, the provisions of Variation no. 3 at Dunboyne are submitted to be:

- Renaming the Dunboyne-Clonee-Pace LAP to the the Dunboyne North – Dunboyne - Clonee LAP
- Rezoning of lands to the north of the M3 for largely employment uses.
- Rezoning of lands in the vicinity of the rail station from mixed residential and business uses with a protection cordon (W/L) to residential land use zoning "AZ" with no phasing restrictions, smaller mixed residential and business uses (C1) and employment lands (E1/E3 & E3) and transportation facilities (T1).

We submit that Variation No. 3 for reason if its extent and impact is an effective review of the Dunboyne-Clonee-Pace LAP to become the Dunboyne North – Dunboyne - Clonee LAP that replaces the development potential of Clonee with 'Dunboyne North' to deliver Dunboyne as a Large Growth Town II.

3.0 DRAFT MINISTERIAL ORDER SUMMARY

The Department of Environment, Community and Local Government is a statutory consultee for plan making and therefore variations of the plan. The Minister states that through their Department submissions were made to Meath County Council on 26th January and 19th April 2016 in relation to the then Draft and latterly Amended Draft Variation no. 3.

The draft ministerial order states that the submissions were made in relation to lands at Pace north of Dunboyne only to:

1. remove the proposed residential content/zoning, and
2. ensure that there was proper traffic and transport assessment of all development policies in order for the proposals to accord fully with Ministerial Planning Guidelines issued under section 28 of the Planning and Development Acts, 2000-15

Meath County Council in their advertisement of the draft Ministerial Order have summarised the rationale for the draft direction as follows.

- i *"The creation of a new residential development detached and distinct from the existing urban area of Dunboyne in clear breach of the sequential approach to zoning of lands as identified in the Development Plan Guidelines (2007)*
- ii *The provision of an objective for high technology/office/logistics employment uses in close proximity to Junction 5 of the M3 Motorway in the absence of a comprehensive traffic assessment which has the potential to generate traffic volumes to limit the operation of the nearby national motorway interchange.*
- iii *The Dunboyne/Clonee/Pace LAP 2009 (Objective RET OBJ1) provided for the development of a new Level 2 retail centre at Pace and has now been inappropriately translated into a separate isolated residential objective A2 and employment Objective E1-E3 zonings."*

For these reasons the minister finds that the Variation is at variance with national policy (the Local Area Plan Guidelines, 2013, the Spatial Planning and National Roads Guidelines, 2012 and the Development Plan Guidelines 2007) and the requirements of Section 19(2) of the Planning and Development Acts, 2000-2015 as it is not consistent with the Core Strategy of the Meath County Development Plan 2013-2019.

4.0 GLENBEIGH POSITON

As attested to in previous submissions to variation of the County Development Plan, Glenbeigh are local developers and support the proper planning and sustainable development of the County in the interests of Meath becoming the preferred destination for inward investment and residential development within the Greater Dublin Area (GDA)

Glenbeigh recognise that the development potential of the subject lands for residential development has not been compromised in Variation No. 3 but we submit that the extent of rezoning under this Variation at Dunboyne is rooted in a reliance on the settlement hierarchy positon of Dunboyne and an evident urgency to provide immediately realisable residential development to service these employment lands, also under Variation No. 3.

We further submit that the revised rezoning and the renaming of the existing LAP to shift focus from Clonee to Dunboyne North is tantamount to a review of the Dunboyne-Pace-Clonee LAP and therefore the release of residential lands to service the needs of employment lands is best serviced by releasing residentially zoned lands currently within Phase II and already identified as suitable in principle for such development.

We submit that a review of the planning policy for the development of Dunboyne against real development reveals a stagnation in the town's development contrary to the Core Strategy of the Plan. We further submit that critical mass is a cornerstone of developing Dunboyne as the second Town of Meath and therefore realising all residentially zoned land for development now is in the interests of the proper planning and sustainable development of the Town, the county, the GDA and the retention of future workers within the employment lands at Dunboyne North within Dunboyne Town.

By releasing Phase II residentially zoned lands in Dunboyne now the Council will realise compliance with their own stated Core Strategy Objectives themselves already adjudged to be compliant with national and regional planning policy.

Glenbeigh are not against the rezoning of lands at Dunboyne North from rural to employment and residential. In fact, Glenbeigh realise the benefits of zoning lands to accommodate planned development of this second tier Town for Meath to fulfil its GDA role as a Large Growth Town II. However, Glenbeigh strongly feel that this rezoning, reliant as it is on the planned role of Dunboyne, should be done in a sequential manner. For this reason those lands, like their own landbank, already identified, accounted for and serviced for development should be allowed to develop at least in tandem with the new employment and residential lands.

We submit that by releasing the Phase II lands alongside the retention of the retail role of Dunboyne North and a commitment to undertake a strategic transportation study for the newly rezoned employment and residential lands at Dunboyne North that Variation No. 3 with these minor but vital alterations will reenergise the development of Dunboyne to the benefit of the county at large within the thresholds of higher order policies and guidelines. These alterations will mean that Variation No. 3 will deliver the requirements of Meath County Council in a sequential manner that has regard to national planning guidance, regional status of the town, and their own Core Strategy and PLUTS (Planning land use transportation) commitments.

5.0 PLANNED DEVELOPMENT OF DUNBOYNE

In order to illustrate the planned role of Dunboyne and its growth to execute that role a summary rendition of the status and planned development of Dunboyne is provided here. The next section highlights the actual realisation of the planned development and practicalities of meeting planned growth commitments.

5.1 Regional Planning Guidelines (RPGs) for the Greater Dublin Area (GDA) 2010 - 2022

Although a new National Planning Framework to replace the existing National Spatial Strategy (NSS) 2002 – 2020 alongside Regional Assembly planning guidelines 2010 - 2022 are in preparation the settlement and thus land use hierarchies of the NSS and RPGs persist.

Table 8 of the RPGs "*Settlement Typology and Hierarchy*" of the GDA RPGs defines Dunboyne as a "*Large Growth Town II*" on par with areas such as Newbridge, Greystones, and Cherrywood. This designation reflects the town's strategic location, its high quality transport links and its responsibility and ability to accommodate population growth. In Section 4.6 "*Defining the Key Elements of the Strategy*" it is noted that Large Growth Towns are to accommodate significant investment in transport and economic activities, and that they are of importance to the region as centres for public services, high order retail and housing. It is stated that "*Large Growth Town II*" centres shall aim to have a population of between 15,000 and 30,000 people so as to maintain these vital services and functions.

Dunboyne has been placed at Level 3 in the Retail Hierarchy of the Region, which is a hierarchy of 5 no. levels with Dublin City Centre being the only Level 1 centre. It is noted in Figure 8 "*The Retail Hierarchy of the Retail Strategy*

for the Greater Dublin Area 2008-2016' of the RPG's that Dunboyne is to grow over the next 20 years to move up in the Retail Hierarchy to become a Level 2 "Major Town Centres and County Town Centres" on par with areas such as Swords, Liffey Valley, Dundrum, Bray, Navan or Naas/Newbridge. In this way, the RPGs define Dunboyne as a prime location for residential and economic development within County Meath.

The designation of Dunboyne as a "Large Growth Town II" in the NSS and RPGs reflects the town's strategic location, its high quality transport links and its ability to accommodate population growth. It is clear that it is an objective of government that Dunboyne accommodate significant levels of population growth. We submit that the subject lands are zoned for residential development and can be immediately used to accommodate new population within the designated town. As such, the subject lands, alongside those identified in Variation No. 3 should be immediately released for development as part of Variation No. 3.

5.2 Meath County Development Plan 2013 – 2019; the role of Dunboyne

As per the requirements of the Planning and Development (Amendment) Act 2010, the Core Strategy of the County Development Plan 2013 - 2019 outlines the overall vision for the county and provides a framework on how this vision is to be achieved. Table 2.1 "County Meath Urban Settlement Hierarchy" of the Core Strategy repeats that Dunboyne is defined as a Large Growth Town II.

The Core Strategy identifies a 5 tier settlement hierarchy whose nomenclature derives from the NSS and RPGs: Large Growth Town I: Navan, Drogheda Environs | Large Growth Town II: Dunboyne, Maynooth Environs | Moderate Sustainable Growth Towns: Ashbourne, Kells, Trim, Kilcock environs, Dunsaulhin (contingent on rail access) | Small Towns: 7 no. including Oldcastle and Ratoath | Villages: 24 no. including Ballivor and Slane.

Dunboyne is second only to the County Town of Navan; those two top tier county settlements being the only ones in their categories wholly located within the county. Like the RPGs the stated population target for Dunboyne is 15,000 to 30,000 people.

After the RPGs, section 3.7.5 of the current Development Plan "Secondary Economic Growth Towns" outlines that Dunboyne is within the Dublin Metropolitan Area, and makes note of the high levels of outward commuting to Dublin City from the town. It is further stated that Dunboyne, as part of the Ashbourne/Dunboyne Economic Area, plays a vital role in the economic growth of the area in spite of the fact that it has yet to realise its full potential in terms of its designation as a Large Growth Town II. This failure is illustrated in the low rate of committed residential development within the town and needs to be redressed in order for Dunboyne to perform on a par with other towns of a similar designation in neighbouring counties thus increasing the competitiveness of County Meath within the GDA. We submit that the lack of growth of Dunboyne continues to today for reason of inability of those holding zoned residential lands being able to progress planning applications and actual development on those lands.

The first set of development objectives of the County Plan appear at Chapter 2 Core Strategy. These 9 objectives set the priority actions for the council over the plan period in order to implement the Core Strategy "which sets out the overall vision for the county and the core principles underlying the development strategy in the Plan." We submit that these objectives are the key development objectives for the County Plan and have not been applied as set out in the Plan as Variation no. 3 has been proposed ahead of a review of the LAPs for the county having the effect of continuing to retard the development of Dunboyne and therefore the implementation of the Core Strategy.

However, we discern from Variation No. 3 that Meath County Council in line with their own Economic Development Strategy 2014 – 2020, Economic Objectives of the Development Plan and the realities of the progression of the development of Dunboyne have in Variation No. 3 identified; new employment lands, mixed use and residential development areas that shift focus from Dunboyne – Clonee - Pace to Dunboyne North – Dunboyne - Clonee in

order to allow Dunboyne to achieve the critical mass envisaged and planned to meet its role within the region and country. It is Glenbeigh's contention that this role will be fulfilled at a faster pace, in accordance with ascribed land use zonings and therefore patterns of development where already identified development lands are released to enable development now rather than sometime after 2019.

5.3 The planned growth of Dunboyne, LAP and Census returns

At the time of the making of the Dunboyne-Clonee-Pace LAP 2009 – 2015 the baseline population was recorded in the SEA as follows; *"The population of Dunboyne Electoral Division (ED) in 2006 increased by 21.4% from 2002. This represents a significant slowdown from the 74.1% rate of increase experienced between 1996 and 2002. The population of Clonee is recorded at 1,000 in the 2006 census reflecting a significant increase. The bulk of the population growth is directed to the urban centre of Dunboyne."* [emphasis added]

At that time a population increase of 15,237 residential units was assigned to Meath under the then RPGs for the period 2003 – 2010 and Dunboyne was a Level 3 Moderate Growth Town with a target population of 1,500 to 5,000. Latterly, with the reopening of the rail line and the new Pace Train Station a move to a Level 2 town designation was envisaged and population increases were assigned at that level. *"The combined urban populations of Dunboyne and Clonee was recorded at 6,713 (Dunboyne: 5,713 and Clonee: 1,000) in the 2006 Census. The County Development Plan has indicated that 3,550 households will be allocated to the Corridor over the life of the Development Plan i.e. by 2013. The County Council considers that there is potential to accommodate a further 4,500 households in the 2013-2019 Development Plan period. The medium term population horizon for Dunboyne/Clonee/Pace corridor is 25,000 people."* [emphasis added]

According to CSO results from CD114 the Dunboyne Electoral Division population increased from 5,713 to 6,959 or by 21.8% between 2006 to 2011. Over the same period Clonee decreased from 1,000 to 631 and thus a decrease of -36.9%. Together these rates of increase were far below what was required of the settlements under their LAP and under the current County Plan where a population target of 15,000 to 30,000 envisaged which accords with the 25,000 under the LAP.

Meath County Council target Dunboyne population for 2013 and 2019 in 2009	
Stated population target for Dunboyne under the Dunboyne Clonee Pace LAP 2009 – 2015:	
Over the then current Development Plan Period i.e. by 2013 (from 2009 – 2013) 3,550 new households	
Over the next County Development Plan period i.e. between 2013 – 2019: 4,500 households	
Actual recorded population	
2006 census Dunboyne: 5,713 or 1,970 households ¹	2006 Census Clonee: 1,000 or 345 households
2011 Census Dunboyne 6,959 or 2,400 households	2011 Census Clonee: 631 or 218 households

NOTE 1: A household formation rate of national average 2.9 is used to approximate number of households. This rate is after average used by Meath County Council in Variation No. 2 of the current County Development Plan. Average for Meath at 2011 census was 2.64 persons with a recorded population of 184,135 persons in 69,697 households.

Growth rates for Dunboyne were slow relative to the county at large which was driven by its commuter towns, according to section 3.2 (Background) from the Settlement Strategy & Housing Chapter of the current County Development Plan *"County Meath has experienced significant population growth over the last fifteen years... increasing from 109,732 in 1996 to 184,135 in 2011. This equates to an increase of some 68%. Within the Greater Dublin Area, Meath experienced the second [after Fingal] greatest rate of population increase between 2002 and 2011 at 37%. This increase in population has led to Meath comprising an increasing percentage of the population of*

the GDA. This percentage rose from 8.7% in 2002 to 10.2% in 2011. The population increase in Meath outstripped the Stage average over the intercensal periods where the State had population growth of 1.3% between 1996 – 2002, 2% between 2002 - 2006 and 1.6% between 2006 – 2011¹. This however translated into a larger increase in household formation over the last intercensal period where total households increased by 12% nationally between 2006 – 2011². In the period 2006 – 2011 Meath like its mid-east counterparts experienced population growth between 10 – 15%.

It is evident therefore that by 2011, despite the opening of the new train station and zoning of lands, that development of Dunboyne was retarded well below the levels envisaged in the LAP but in percentage terms was commensurate to the county growth rates between 2006 -2011. However, in real numbers, by 2011 Dunboyne accounted for 3.78% of Meath's population and with Clonee only 4.12% of that population. In addition, despite being designated the second town of Meath Dunboyne, including Clonee to reflect the LAP, ranked 7th and 6th of 15 no. settlements in 2006 and 2011 respectively. See Table 1 at the rear of this submission³.

It is accepted that at last census other factors, not least including a wastewater treatment capacity issue, now addressed, contributed to this slow rate of growth in Dunboyne but it is submitted that other 'commuter' towns and villages at this time outstripped Dunboyne for new development contrary to its higher order position on the GDA and Meath settlement hierarchy. We further submit that the retardation of the development of Dunboyne continues to persist to today in contravention of the envisaged and planned role of Dunboyne.

5.4 Planned Growth Rates over the current Development Plan 2013 -2019

In the current County Development Plan having regard to the RPGs set 2016 population target for Meath of 195,898 persons and 210,260 persons at 2020 Meath County Council, in deference to falling household formation rate trends, estimated 79,729 and 95,458 housing units requirement in 2016 and 2022 respectively.

The Meath Housing Strategy translates these targets to 15,613 units being required for the county between 2013 and 2019 and having regard to the 2022 targets and headroom makes provision for 23,940 units. At the end of 2011 Meath estimated 10,998 committed units. At table 2.4 of the 2013 – 2019 Plan the household allocation for the urban and rural areas of the county is set and stated to be influenced by factors, including actual development measured by existing planning permissions only and adopted via Variation No. 2 of the Plan in May 2014.

At table 2.4 of the Plan an allocation of 1,494 households for Dunboyne over 2013 – 2019 and 84 no. for Clonee over the same period was the translation of the county targets for the same period. At that time an excess of 56.6 ha. of zoned land was discerned in Dunboyne at a rate of 45 units per hectare (ha.) and -1.2 in Clonee on the basis of 35 units per ha.

Table 2.5 of the Plan sets out the number of committed units defined as those with planning permission yet to be built for each identified settlement on the hierarchy beside the number of households planned to be built in each

¹ Census of Population 2011 Preliminary Results, CSO, 30 June 2011

² *The number of private households in Ireland grew from 1.12 million in 1996 to 1.65 million in 2011. This includes an increase of 12.6 per cent, or 187,000 households, between Census 2006 and 2011.* ESRI Special Article Alternative Scenarios for New Household Formation in Ireland, Quarterly Economic Commentary – Spring 2014

³ Later in this submission we identify 19 no. settlements on the order of priority for release of residential lands that were at a level commensurate with Dunboyne. The 15 no. settlements provided in order to illustrate the ranking of Dunboyne at 2006 and 2011 census are those from the 19 no. for which census figures are readily available.

settlement over the period 2013 – 2019. Table 3 at the rear of this submission repeats the information of table 2.4 and 2.5 of the Plan and assigns rankings to the position of Dunboyne for:

2013 – 2019 Dunboyne/ Clonee Committed and Planned Assigned units at 2014

The number of committed units: 113 no. making Dunboyne 15th ranked of the top 19 no. settlements. This ranking and number of committed units is evidence of the slow development of Dunboyne. At this time Clonee had 601 no. committed housing units making it 7th in the county.

The number of assigned units: 1,494 no. placing Dunboyne 2nd to Navan only which we submit is correct according to its position on the settlement hierarchy and the interests of sequential development. At this time Clonee was assigned 84 no. additional units resulting in a ranking of 15th for the village.

The number of committed and assigned units: 1,607 for Dunboyne resulting in a ranking of 4th behind Navan (4,770), Drogheda Environs (2,510) and Ashbourne 1,993 and only slightly ahead of Trim (1,430). At this time Clonee had a total of 685 no. committed and assigned units placing it in 9th place.

At the time of the making of the current Development Plan Dunboyne was, and remains, the subject of the Dunboyne – Clonee – Pace LAP 2009 – 2015.

Variation no. 2 of the current County Development Plan implemented the Core Strategy Objectives and applied 'phasing' to residentially zoned and some employment lands having regard to the matters summarised in table 1 at the rear of this submission. At this time too the strategic flood risk assessment for the county was prepared and therefore lands within flood zones holding land use zoning objectives for development were excluded. This had the net effect of excluding Clonee residentially zoned lands. We submit that in view of the spatial extent, location and transport links of Clonee and Dunboyne that it is appropriate the residential yields expected from Clonee be assigned to Dunboyne. We further submit that in view of the changes via Variation No 3 and the focus of the development of Dunboyne via an LAP now renamed Dunboyne North – Dunboyne - Clonee LAP from Dunboyne – Clonee - Pace LAP that such reassignment is appropriate. Both Dunboyne and Clonee are highlighted at Table 3.

6.0 ACTUAL DEVELOPMENT OF DUNBOYNE

It is submitted that in order to meet the population growth targets for Dunboyne as set out in the RPGs and repeated in the County Development Plan that development of lands with residential land use zoning should be encouraged rather than delayed.

In particular, it is submitted that Dunboyne as a Large Growth Town II and noted in the RPGs as not meeting its required population growth is a centre within the county which, above other centres, should be facilitating new residential development in order to deliver critical mass in the town and the county. The slow growth of Dunboyne, second only to Navan as the top settlements entirely within the county, is brought into sharp focus when one reviews Table 2.5 of the Plan "Allocated and Committed Units" as repeated at table 3 of this submission. Here we see that the identified 113 units with planning permissions but unbuilt (therefore designated "committed") for Dunboyne falling understandably behind Navan at 786 units, well behind the portion of Drogheda within the Meath border at 1,653 units but also below 4 of the 5 Moderate Growth towns, 5 of the Small Towns and even 2 of the Villages. In other words the rate of committed development in Dunboyne, second only in development importance to Navan, at the time of the making of the Plan was slower than 14 of the other designated centres where 12 of those centres lie below it in the settlement hierarchy.

It is noted that the amount of 'committed' units in Dunboyne at the time of making of the Proposed Variation No. 2 had only increased by 3 no. to 116 no. This rate of permitted but unbuilt residential development will not deliver the growth required and envisaged in the RPGs and County Development Plan.

We have performed a search of planning permissions and applications in Dunboyne, and in so far as is possible those lands within the Dunboyne LAP boundary. See table 4. We have found that since 2013 155 no. units have been granted planning permission over 37 no. planning permissions; the majority being for single dwellings (26 no.). Using commencement notices received from the end of 2012 to now it appears that only 16 no. units have been built; only two of those notices refer to multi-unit development of 7 and 2 no. respectively. In other words a town that is to deliver an assigned 1,474 units over the Plan period has delivered approximately 16 no. over half way through the Plan period.

Table 4 of this submission further indicates that there appears to be 130 no. units permitted and unbuilt at this time which is an increase of 11 no. on those calculated by the Council in December 2014.

Only 9 no. of these permissions were for more than one unit the largest being 65 no. units the subject of an extension of duration of planning permission and the smallest multi-unit development being for 2 no. units.

At this time there are two further planning applications being considered for which further information has been requested; 1 and 28 no. houses respectively.

The low level of uptake of planning permissions i.e. actual development is illustrated in the council's own Two Year Progress Report on the Development Plan in the next section of this submission but a review of commencement notices for the county and Dunboyne reveals very low levels of development, and in particular no development in Dunboyne. Information from the BCMS on 2016 tells us that there have been no commencement notices submitted for Dunboyne in 2016. With the only residential units addressed at Dunboyne being outside the designated urban area for 2 no. one off house (Warrenstown and Castlefarm). See table 5.

Table 5 Residential unit Commencement Notices and completions for Meath 2011 to 2016

	2011	2012	2013	2014	2015	2016	TOTALS
Total Meath Residential Units Commencements ²	190	142	200	169 36 Jan & Feb ¹ 133 Mar to Dec ²	429	351 Jan to May	1,481 Jan 2011 – May 2016 1,149 Jan 2013 – May 2016 798 Jan 2013 – Dec 2015
Total Meath Residential Units Completions	369	353	286	403	488 ³	Not available	1,177 Jan 2013 – Dec 2015

NOTES:

1 Commencement Notice information from January 2011 – February 2014 from CSO

2 Commencement Notice information from March 2014 to May 2016 from BCMS

3 House completions from CSO Local Authority Housing Sector and Year

We submit that the development policies for Dunboyne have not been sufficiently aggressive to meet the population and therefore service and land use target role for the town, that when taken with Clonee it ranked only the 6th largest town in Meath at the 2011 Census. It ranked only 15th of the top 19 settlements with extant, not taken up, planning

permissions referred to as *“committed units”* in the Plan in 2013 with 113 no. units, at December 2014 the Council stated 119 committed but unbuilt units and today finds itself with only approximately 130 permitted but unbuilt units.

Although Dunboyne was assigned the 2nd largest new housing units allocation over the current Plan period of 1,474 no. units this was not sufficient to improve the critical mass of Dunboyne to reflect its ranking as a Large Growth Town II with an RPG target population of 15,000 to 30,000 persons by 2022 and an LAP medium target of 25,000 with envisaged delivery of over 3,000 new housing units between 2009 – 2013 and a further 4,500 over 2013 and 2019 in the LAP which did not happen. The current development policies and particularly the artificial delay of the phase II lands (even for the pursuit of planning permission until after 2019), has stunted the growth of this town such that it cannot under the current policy regime, move toward fulfilling its second town role in Meath. We submit that this is contrary to SS OBJ 9 of the County Plan *“To ensure that Dunboyne develops as a key settlement centre in the Metropolitan Area of the Greater Dublin Area and to ensure that the settlement grows in a manner that is balanced, self sufficient and supports a compact urban form and the integration of land use and transport.”*

Dunboyne starts from a recorded population of just under 6,000 persons in 2011 and just over 6,700 when the population of Clonee is added to it in that year. Residential development potential and allocations for Clonee have been, by Variation No. 3, supplanted by Dunboyne North. We have previously submitted here and reiterate that the housing allocation for Clonee should be reassigned to the new LAP area as proposed under Variation No. 3 with its new name; Dunboyne North – Dunboyne - Clonee LAP. It may be that the lands newly designated under Variation No. 3 for residential development are a reflection of the loss of the majority of the residential development potential of Clonee due to flood impacts. Notwithstanding, we submit that having regard to the stagnated development of Dunboyne that the release of the residentially zoned Phase II lands now is in the interests of the proper planning and sequential sustainable development of the town.

7.0 CONFLICT OF PLANNED AND ACTUAL DEVELOPMENT

Section 15 of the Planning and Development Act, as amended requires a review of the progress in achieving objectives of the Development Plan. In deference to this requirement Meath County Council prepared a *“2 Year Progress Report of Realising Objectives”* in 2015 and did record the progress toward new household formation as committed to under CS OBJ 9.

The results of the progress report are included in table 3 and we submit endorse the stagnation of development in the county and in particular in relation to Dunboyne. The Progress Report itself records only two multiple unit permissions in the county since the Plan took effect; 298 no. units in Navan and 62 no. in Ratoath. They record too the withering of multi-unit permissions at Navan, Drogheda, Ashbourne, Trim, Bettystown, Clonee (269), Summerhill and Longwood. The overriding feature of multi-unit residential development being extension of duration permissions.

The Two Progress Report concludes; *“This exercise has demonstrated that there has been no activity in the domestic multiple house construction sector since the County Development Plan took effect. There remains a considerable bank of extant planning permissions in place, the majority of which are located in centres in the top tiers of the county settlement hierarchy. It is not considered that there is a supply constraint evident from this analysis and update. There is presently in place planning permission for approximately 9,000 units within multiple house developments in the county which would equate to over 4 years demand should the projections contained in the Housing Strategy become realistic in the remaining years of the County Development Plan.”*

Glenbeigh refute the ultimate findings of the Two Year Progress Report in relation to the release of residentially zoned lands particularly in the case of Dunboyne. The conclusion of the Two Year Progress Report is simplistic in that it takes a measure of the existing planning permissions in Meath and does not perform any analysis of the

location and likelihood of actual development and therefore does not discern patterns of stagnation in priority settlements, or in the case of Dunboyne the continued lack of development and therefore population increase of the town that was lagging behind other, lower tier settlements, even before economic recession. We submit that the allocation of new housing units by the 9 no. metrics set down in the Development Plan are over-reliant on the existence of planning permissions and do not account whatsoever for actual development.

Even if we apply a simplistic measure to the 9,000 permitted but unbuilt units identified in the county in the Two Year Progress Report and assume all of those occur in designated settlements; then if all were built immediately the without headroom target set in the Housing Strategy of 15,613 units between 2013 – 2019 will only be half met. Assigning a simple division of the number of years of existence of a Development Plan, as seems to have been done at the Two Year Progress Report in order to find that 9,000 permitted but unbuilt units for the period 2015 – 2019 is acceptable is submitted as misleading because zoned and serviced lands should not find any delay in their being developed and therefore annual disaggregation is not relevant or necessary. In any case, it is also emphasised that the Two Year Progress Report had already identified that permitted units were not coming to fruition by reference to lack of permission for multiple units and the feature of extensions of duration of planning permissions by receivers and liquidators.

Moreover we submit that the preclusion of even the submission of a planning application for Phase II residentially zoned lands is a further frustration to the development of Meath and Dunboyne in particular. Planning permission, for various reasons, take some time to secure, never mind implement and therefore there is no certainty that there will be a delivery of new housing units immediately in 2019 as assumed in the Development Plan. Each site is different and poses its different challenges outside of planning permission each of which, or a combination, can delay or stop development: access; ownerships; financing; cost of building; experience of developer; services; topography; ground conditions; natural, environmental, material and cultural assets can all be matters specific to a site that will delay its development whether planning permission exists or not.

The conclusion of the Two Year Progress Report has led directly to a lack of urgency to review LAPs, a stated objective of the Development Plan. This lack of dedicated review has further stagnated the development of Dunboyne from Glenbeigh's perspective, itself a building company in possession of accessible, serviced residentially zoned lands within Dunboyne Town limits who wished to seek planning permission in 2014 and build immediately on foot of that permission.

We submit that the Department's Planning Policy Statement 2015, published in January 2015 signalled the changes to the regional and local planning statute that was then being implemented and clearly identified policy measures and directions. The Policy lays out 'Key Principles' and 'Key Priorities'. There are 3 no. Key Priorities; 1. Establishment of the Office for Planning Regulation; 2. Planning and Economic Recovery and 3. Enhancing Service Delivery.

We submit that under the Key Priority of Planning and Economic Recovery that the Department recognises the very matter that frustrates the development of Dunboyne and Glenbeigh: the difference between planned and actual development at "Active Land Management by Planning Authorities". Here it is stated that "Preparation of development plans is only an initial step. Plan implementation is key and the actions in Construction 2020 will be progressed to enable planning authorities to more dynamically lead and manage the development process in their areas, ensuring that land zoned for development actually comes into use as anticipated in development plans and in tandem with supporting infrastructure." [emphasis added]

We submit that Variation No. 3 is in direct response to the Council's findings of requirements of increased areas of employment lands and as it is joined by lands newly residentially zoned at Dunboyne North also displays an urgent need for immediate residential development in order to deliver the critical mass for Dunboyne as a Large Growth Town II. The Development Plan review did not have regard to actual development levels which have been set out in this submission. We submit that the release of the exiting residentially zoned Phase II lands in Dunboyne as part of

Variation No. 3, having regard to the planned and actual development of the town, will best realise this potential and will be compliant with the hierarchies and sequential approach of the authority in the Development Plan.

8.0 CONCLUSION

Glenbeigh do not wish to see Meath County Council loose aspects of Variation No. 3 where the Council have discerned a real need for additional employment and residential lands alongside a reduced extent mixed residential and business land use zoning objective that can realise the retail potential of Pace.

In defence to the need for a sequential approach to the designation of the lands under Variation No. 3 we have here set out that a review of the planning policy for the development of Dunboyne against real development and found a near halt the town's development contrary to the Core Strategy of the Plan. Critical mass is a cornerstone of developing Dunboyne as the second Town of Meath and therefore realising all residentially zoned land for development now is in the interests of the proper planning and sustainable development of the Town, the county, the GDA as set out in national, regional and local planning policy.

We repeat that Glenbeigh strongly feel that this rezoning, reliant as it is on the planned role of Dunboyne, should be done in a sequential manner. For this reason those lands, like their own landbank, already identified, accounted for and serviced for development should be allowed to develop at least in tandem with the new employment and residential lands. Alongside a time-delimited commitment to undertake a strategic transportation study for the newly rezoned employment and residential lands at Pace and Dunboyne North under Variation No. 3 will mean the requirements of Meath County Council in a sequential manner that has regard to national planning guidance, regional status of the town, and your own Core Strategy and PLUTS (Planning land use transportation) commitments can be realised in this Variation.

Yours faithfully,

Cliona Ryan
Director

TABLE 1 CENSUS 2011 – POPULATION CLASSIFIED BY AREA (TABLE 5 POPULATION OF TOWNS ORDERED BY COUNTY AND SIZE, 2006 & 2011)

Settlement Hierarchy Position	Name of Settlement	2006	2011	Percentage Change %	2006 population size ranking	2011 population size ranking
Large Growth Town I	Navan Town	3710	28158	659		
	Environs of Navan	21,141	401	-98.1		
	Navan Total	24,851	28,559	280	2nd	1st
	Environs of Drogheda	4787	5983	25	9th	7th
Large Growth Town II	Dunboyne	5713	6959	21.8		
	Clonee	1000	631	-36.9		
	Dunboyne LAP total Total	6,713	7,590	-8	7th	6th
	Maynooth Environs					
Moderate Sustainable Growth Towns	Ashbourne	8528	11338	33	5th	3rd
	Trim	1375	1441	4.8		
	Environs of Trim	5495	6827	24.2		
	Trim Total	9,903	12,779	19	3rd	2nd
	Kells	2257	2208	-2.2		
	Environs of Kells	29911	3680	23		
	Kells Total	32,168	5,888	10	1st	8th
	Dunshaughlin (only Dunshaughlin ED)	3384	3903	15.3	9th	10th
Kilcock						
Small Towns	Athboy	2213	2397	8.3	12th	13th
	Laytown-Bettystown-Mornington (inc. part of Julianstown & St. Mary's)	8978	10889	21.3	4th	4th
	Duleek	3236	3988	23.2	10th	9th
	Enfield	2161	2929	35.5	13th	12th
	Oldcastle	1316	1384	5.2	14th	14th
	Ratoath	7249	9043	24.7	6th	5th
	Stamullen	2487	3130	25.9	11th	11th
Villages	Rathmolyon	168	298	77.4	15th	15th

TABLE 2 CORE STRATEGY OBJECTIVES OF MEATH COUNTY DEVELOPMENT PLAN 2013 – 2019

Chapter 2 Meath County Development Plan 2013 – 2019 Core Strategy Objectives	Implementation of Core strategy Objectives
<p>CS OBJ 1 <i>To ensure that planning applications for residential development on greenfield lands (i.e. 'A' zonings) in the urban centres detailed in Table 2.1 (settlement hierarchy) will be considered premature until such time as the relevant Town Development Plan or Local Area Plan has been made, varied or amended to make it consistent with the settlement strategy and core strategy, particularly Table 2.4, of this Development Plan.</i></p>	<p>Development on Glenbeigh lands zoned A2 and in Phase II of the Meath County order of priority for release of residentially zoned lands so precluded from development by reason of its phasing position. Variation no 2 'phased' the development of residentially zoned lands made in May 2014 after adoption of the plan in January 2013.</p>
<p>CS OBJ 2 <i>To publish variations to the Local Area Plans of Ashbourne, Drogheda Environs, Dunboyne/Clonee/Pace, Dunshaughlin and Ratoath within one year of the adoption of the Meath County Development Plan 2013-2019 to ensure that they are consistent with the Development Plan, and particularly the settlement strategy, core strategy and household allocations outlined in Table 2.4</i></p>	<p>Variations to existing LAPs including Dunboyne – Clonee – Pace LAP 2009 – 2015 made in March 2015. More than two years after adoption of the Plan.</p>
<p>CS OBJ 3 <i>To publish a variation to the Meath County Development Plan 2013-2019 within one year of the adoption of the Development Plan to contain development and zoning objectives for the following centres: Athboy, Gibbstown, Ballivor, Carlanstown, Camaross, Clonard, Crossakiel, Donore, Donacamey/Mornington, Drumconrath, Duleek, Enfield, Gormanston, Julianstown, Kentstown, Kilbride, Kilcock Environs, Kildalkey, Kilmainhamwood, Kilmessan, Longwood, Maynooth Environs, Moynalty, Nobber, Oldcastle, Rathcairn, Rathmolyon, Slane, Stamullen and Summerhill. These objectives shall give effect to and be consistent with the core strategy, policies and objectives of the Development Plan.</i></p>	<p>Zoning alterations made as the same time as the Variations to the LAPs more than than two years after adoption of the Plan.</p>
<p>CS OBJ 4 <i>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 Development Plans will be varied, if necessary, to ensure that they are consistent, within one year of the adoption of the Meath County Development Plan 2013-2019.</i></p>	<p>As above.</p>
<p>CS OBJ 5 <i>To ensure that the review of Town Plans and Local Area Plans to achieve consistency with the core strategy of the Meath County Development Plan 2013-2019 will only identify 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.</i></p>	<p>Two Year Progress Report of Plan reports the making of variation nos. 1 and 2 of the County Plan as achieving this objective and the making of; East Meath Local Area Plan 2014-2020 and that the Kells Development Plan 2013-2019 and Trim Development Plan 2014-2020 are consistent with the core strategy</p>
<p>CS OBJ 6 <i>To ensure that planning applications for residential development adhere to the requirements of Table 2.4 of this Development Plan.</i></p>	<p>As at CS OBJ 1</p>
<p>CS OBJ 7 <i>To promote and facilitate the development of sustainable communities through land use planning, by providing for land uses capable of accommodating employment, community, leisure, recreational and cultural facilities having regard to the quality of the environment, including the natural environment, landscape character and the archaeological and architectural heritage.</i></p>	
<p>CS OBJ 8 <i>To prepare a new Local Area Plan for Bettystown/Laytown/Mornington East within one year of the adoption of the Meath County Development Plan 2013-2019. The new LAP shall be consistent with the Meath County Development Plan 2013-2019 and its core strategy.</i></p>	<p>Bettystown/Laytown/Mornington East LAP is the East Meath LAP made in 2014.</p>
<p>CS OBJ 9 <i>To include in the progress report to be prepared two years after the adoption of the County Development Plan, details of the units permitted to date in comparison with the household allocations detailed in Table 2.4."</i></p>	<p>Prepared, summarised and discussed in submission.</p>



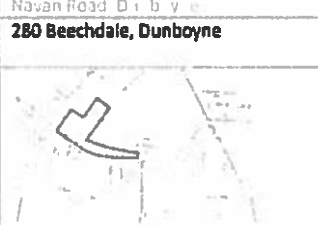
TABLE 3 HOUSING ALLOCATIONS & COMMITTED UNITS MEATH COUNTY DEVELOPMENT PLAN 2013 - 2019



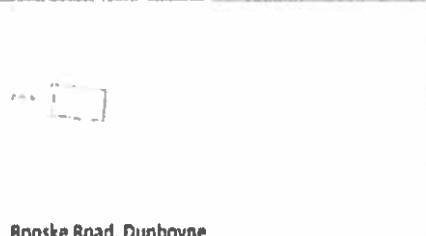





Type of Settlement	Settlement	Meath County Development Plan 2013 – 2019 New housing allocation & Committed units tables 2.4 & 2.5						Meath County Development Plan 2013 – 2019 Two Year Progress Report 2015 (at December 2014)	
		No. of committed Housing units Meath County Development Plan 2013 -2019	Ranking According to no. of committed housing units	Household allocation 2013 2019	Ranking According to no. of new households	Total committed housing units + new households 2013 - 2019	Ranking According to no. of committed housing units + new households	Total Committed unbuilt units (Dec 2014)	Difference between total committed units 2013 & at Dec. 2014
Large Growth Town I (2 no.) (Navan entirely within county, Drogheda Environs related to town centre in Co. Louth)	Navan	786	5 th	3,984	1 st	4,770	1 st	1,187	401
	Drogheda Environs	1,653	1 st	857	3 rd	2,510	2 nd	1,174	-479
Large Growth Town II (2 no.) (Dunboyne entirely within county, Maynooth Environs related to town centre in Co. Kildare)	Dunboyne	113	15 th	1,494	2 nd	1,607	4 th	119	6
	Maynooth Environs	0	19 th	199	14 th	199	18 th	0	0
Moderate Sustainable Growth Towns (5 no.)	Ashbourne	1356	2 nd	637	4 th	1,993	3 rd	1,132	-224
	Trim	912	4 th	518	5 th	1,430	5 th	755	-157
	Keils	349	9 th	518	6 th	867	8 th	352	3
	Dunsaughlin	784	6 th	319	8 th	1,103	7 th	763	-21
	Kilcock	0	18 th	398	7 th	398	14 th	0	0
Small Towns (7 no.)	Athboy	159	13 th	319	9 th	478	11 th	126	-33
	Bettystown/Layt own/Mornington East	1,077	3 rd	80	16 th	1,157	6 th	1,409	332
	Duleek	160	12 th	239	12 th	399	13 th	169	9
	Enfield	31	16 th	319	10 th	350	15 th	34	3
	Oldcastle	9	17 th	319	11 th	328	17 th	24	15
	Ratoath	311	10 th	239	13 th	550	10 th	375	64
	Stamullen	262	11 th	80	17 th	342	16 th	262	0
Villages (24 no.) 3 no. of the recorded villages were above the committed no. of units in Dunboyne	Clonee	601	7 th	84	15 th	685	9 th	248	-353
	Mornington / Donacorney	420	8 th	20	18 th	440	12 th	481	61
	Rathmolyon	120	14 th	20	19 th	140	19 th	69	-51
	Other villages (21 no)	392	n/a	983	n/a	1,395	n/a	199	-193
Rural Houses	1,479	n/a	1,320	n/a	2,799	n/a	1,479	0	
TOTAL		10,974		12,946*		23,940		10,357	




NOTES

* Meath County Plan states 12,942

TABLE 4 PERMISSIONS/APPLICATIONS DUNBOYNE SINCE 2013

Reg. Ref.	Date of Decision	Date of Expiry	No. of Additional Units	Address (and Site Location Map Where Available)	Commencement Notice
DA801807 Also DA140028	10/08/2009 21/01/2014	Sept. 2014 16/12/2018	23	Kellys, Station Road, Dunboyne Ext. of duration of planning permission	No
DA802292 Also DA140333	02/10/2009 25/04/2014	Nov. 2014 01/10/2019	65	Navan Road, Dunboyne	No
DA802417 DA140045	05/08/2008 27/01/2014	Feb. 2014 23/02/2019	3	Grange, Maynooth Road, Dunboyne	No
DA803019	30/10/2009	Dec. 2014	7	The Laurels, Rooske Road, Dunboyne	Yes. Received 12/10/2012 Received 13/09/2013
DA900110 RA140497	24/09/2009 10/06/2014	Oct. 2014 16/12/2018	4	Dunboyne Castle & Grounds, Dunboyne	No
DA900111	02/06/2009	Jul 2014	1	Kennedy Road, Dunboyne	No
DA900907 Also DA140249	01/04/2010 02/04/2014	May 2015 16/12/2018	4	Walled Garden, Dunboyne Castle, Dunboyne	No
DA901633	07/05/2010	Jun 2015	1	Hunters Walk, Oranstown, Dunboyne	Yes Received 31/05/2015
DA100343	05/07/2010	Aug 2015	1	Dublin Road, Dunboyne	No
DA100572	08/09/2010	Oct 2015	1	Kilclone, Dunboyne	Yes Received 16/08/2011
DA100616	08/10/2010	Nov 2015	1	Quarryland, Dunboyne	Yes Received 13/10/2010
DA110032	29/08/2011	Oct 2016	1	Winterwood, Pace, Dunboyne	Yes Received 04/11/2013
DA60585	17/12/2006	Mar 2012	1	11 Garnett Hall, Summerhill Road, Dunboyne	Yes Received 02/10/2014
DA110288	30/06/2011	Aug 2016			
DA140131	25/02/2014	Aug 2019			
DA110288	11/10/2011	May 2017	1	Brownrath, Dunboyne	No
DA110288	04/04/2011	Jul 2016	1	11 Garnett Hall, Summerhill Road, Dunboyne	No
DA111178	09/11/2012	Dec 2017	1	Naulswood, Dunboyne	Yes Received 20/08/2013
DA120042	25/01/2012	Jul 2017	1	19 St. Patricks Park, Dunboyne	Yes. Received 14/12/2012
DA120630	18/07/2012	Dec 2017			
DA120280	24/08/2012	Oct 2017	2	Cul Ghlas, Maynooth Road, Dunboyne	Yes Received 24/03/2014
DA100867 Outline Planning Permission DA120374 DA130604 (change of house type)	21/10/2010 31/07/2012 04/11/2013	Nov 2015 Sept. 2017 Dec 2018	1	 Summerhill Road, Dunboyne	Yes. Received 27/11/2013
DA120552	04/02/2013	Mar 2018	1	 Navan Road, Dunboyne	Yes. Received 01/02/2013
DA70336 DA120707	21/08/2007 25/09/2012	Sept. 2012 26/09/2016	1	280 Beechdale, Dunboyne	No
DA120823	30/01/2013	May 2018	1	 Newtown, Dunboyne	No

DA130689	06/11/2013	Dec. 2018	1		Yes Received 18/02/2014
DA130995	23/12/2013	Sept. 2019	1		No
RA160081	03/02/2016	F.I. Request made 23/03/2016	1		UNDECIDED
DA100909 Also RA150860 & RA151431 (Part-complete dev. [DA60606] 10 built & remaining 20 no. reduced to 15 no.)		18.12.2018	15		Active site no commencement on latest application Reg. Ref. RA151431
RA151431 (alterations to elevations, floor plans and site layout Reg. Refs. DA60606, DA100909 & RA150860), for 1 no. additional 2 bed apt.	23/12/2015	July 2021	1		
RA 151320	07/12/2015	F.I. Request Made 29.01.2016	28 houses 13 apart- hotel suites		UNDECIDED
RA150795	27/07/2015	Mar 2021	1		No.
RA140820	15/09/2014	Jan. 2020	1		No.
RA150900	28/08/2015	Feb. 2021	1		No.

				 <p>Navan Road, Dunboyne</p>	
RA141084	04/12/2014	Apr. 2020	6	 <p>Junction Of The Avenue & The Way, Dunboyne Castle, Dunboyne</p>	Yes. Received 15/08/2015
RA150561	03/06/2015	Aug. 2020	1	 <p>Congress Park, Dunboyne</p>	No

1004

Louise Heeney

From: Leah Kenny [leah.kenny@rpsgroup.com]
Sent: 13 July 2016 16:19
To: variation3mcdp
Cc: Patrena Slowey
Subject: Submission 1004 RPS Group (MEATH COUNTY DEVELOPMENT PLAN 2013-2019 VARIATION NO. 3 – DRAFT DIRECTION)
Attachments: Meath CDP_Var No. 3_Submission_13072016.pdf

Dear Mr. Clarke

RE: MEATH COUNTY DEVELOPMENT PLAN 2013-2019 VARIATION NO. 3 – DRAFT DIRECTION

RPS Group, of West Pier Business Campus, Old Dunleary Road, Dun Laoghaire, County Dublin were instructed by our client Godolphin Ireland Unlimited Company, Kildangan Stud, Monasterevin, County Kildare to make the attached submission in relation to the Draft Direction from the Minister of the Environment, Community and Local Government in relation to Variation No. 3 of the Meath County Development Plan 2013-2019.

As requested this submission is addressed to the Administrative Officer, Planning Department, Meath County Council, Buvinda House, Dublin Road, Navan, Co. Meath, C15 Y291 and is issued to Meath County Council by one medium only (as set out in the public notice).

Our client would appreciate confirmation of receipt of this submission by return email.

Regards

XXXXXXXXXXXXXXXXXXXX

Leah Kenny BA (Hons), MRUP, Dip Urban Design, MIPI
Operations Director - RPS
West Pier Business Campus,
Dun Laoghaire, County Dublin,
Ireland
Tel: +353 (0) 1 488 2900
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www: www.rpsgroup.com/ireland

RPS Group Ltd is a wholly owned subsidiary of RPS Group Plc. RPS Group Ltd is the parent company in the Republic of Ireland for all Irish subsidiary companies, namely: RPS Consulting Engineers Ltd and RPS Engineering Services Ltd. The Registered Office of each company is: West Pier Business Campus, Dun Laoghaire, Co. Dublin, Ireland, and each company is registered at the Irish Companies Registration Office in Dublin. Details of the companies registered numbers are as follows:
RPS Group Limited - Registration Number: 91911
RPS Consulting Engineers Limited - Registration Number: 161581
RPS Engineering Services Limited - Registration Number: 99795



West Pier Business Campus, Dun Laoghaire, Co. Dublin, A96 N6T7, Ireland
T +353 (0)1 488 2900 E ireland@rpsgroup.com W rpsgroup.com/ireland

Seán Clarke
Administrative Officer
Planning Department
Meath County Development Plan
Buvinda House
Dublin Road
Navan
County Meath

Wednesday 13th July 2016

Our Ref: MM16000
File Ref: MM16000DPSubFO1

[By e-mail: variation3mcdp@meathcoco.ie]

**Re: Meath County Council Development Plan 2013-2019 – Variation No. 3
Draft Direction**

Lands at Pace, North Dunboyne

Dear Sir/Madam,

RPS Group Limited, of West Pier Business Campus, Old Dunleary Road, Dun Laoghaire, County Dublin has been instructed by our client, Godolphin Ireland Unlimited Company, Kildangan Stud, Monasterevin, County Kildare, to prepare this submission on Variation No. 3 of the Meath County Development Plan 2013-2019.

Our client is the owner and manager of the lands and facilities of Woodpark Stud, Dunboyne. These lands are located immediately to the north of Pace, north of Dunboyne.

It is our clients view that the re-zoning of lands at Pace for a mixture of uses including objective "A2" (residential), Objective "E1/E3" (high technology/manufacturing/office) and Objective "E3" (Logistics/warehousing), represents a valuable opportunity for the strategic planning and sustainable development of Dunboyne and will contribute to the delivery of county wide economic imperatives and opportunities.

Our client would like to note the following:

- The Dunboyne North lands have clearly been identified by Meath County Council as a 'strategic employment site' – one of five such areas identified for the County. This designation has specific regard to its location and proximity to both public rail and motorway links. It is a unique

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The Registered office of each of the above companies is West Pier Business Campus, Dun Laoghaire, Co. Dublin, A96 N6T7



gateway and transport interchange/node and the development of these lands will consolidate the investment in infrastructure at this location.

- The development of the Dunboyne North lands within the Gateway Economic Core Area can assist in accelerating the economic transformation, revitalisation and sustainable development of the County and this is consistent with the objectives of the Economic Strategy for Meath 2014.
- The Dunboyne North lands have the capacity to develop as a sustainable 'live work' community with employment, local retail, educational and community services benefiting from the sustainable transport opportunities offered by public rail.
- The inclusion of residential development at this location cannot be seen in isolation (in terms of the sequential approach to zoning lands); rather it is a key aspect of these lands developing as a sustainable 'live work' community.
- Meath County Council has zoned these lands as an intrinsic part of a wider growth strategy for Dunboyne having regard to the significant potential of the lands. As such the promotion of the lands is based on a considered and 'plan-led' appreciation of their development potential.
- It is considered that the inclusion of 'Dunboyne North OBJ1' in the Development Plan i.e., the requirement for the preparation of a Masterplan and the vision and requirements outlined thereunder, provides a unique opportunity to secure a comprehensive 'plan-led' approach to developing these lands in terms of detailed design and other considerations.
- In the context of the development boundary, existing land uses and land use zoning objectives, the Dunboyne North lands are located north-east of Dunboyne and to the east of the M3. They are also located between established enterprises to the north, and proposed new enterprises to the south, both on the western side of the M3. As such the development of these lands will, in due course, assist in consolidating the urban development structure of, and linkages within, the Dunboyne North–Dunboyne-Clonee area.

In conclusion, our client fully supports the promotion of 'Dunboyne North' as a sustainable community with employment, local retail, educational and community services. Our client also fully supports Meath County Council's inclusion of policies and objectives in the County Council Development Plan 2013-2019 to proactively provide for a masterplan led development approach for these strategically located lands.

We would ask that the Planning Authority give due consideration to this submission.

Yours faithfully,



Leah Kenny
Operations Director
RPS Planning & Environment

Louise Heeney

From: Sean Clarke
Sent: 13 July 2016 16:25
To: variation3mcdp
Subject: Submission 1005 South East Meath Chamber of Commerce (Lands at Dunboyne North - Variation No. 3 Meath County Development Plan)
Attachments: PLAN - Corres - South East Meath Chamber of Commerce - Lands at Dunboyne North - Variation No.3 Meath County Development Plan - 2016.07.13.pdf
Importance: High

Seán Clarke

Administrative Officer | Meath County Council | Planning Department
Buvinda House | Dublin Road | Navan | Co. Meath
E mail sclarke@meathcoco.ie Tel : +353 46 9097540 | Fax:+353 46 9097001 | <http://www.meath.ie/> |

From: Margaret Carroll
Sent: 13 July 2016 16:18
To: Sean Clarke
Cc: Jackie Maguire; Michael Griffin; Patrick Gallagher; Wendy Bagnall; Des Foley
Subject: Lands at Dunboyne North - Variation No. 3 Meath County Development Plan
Importance: High

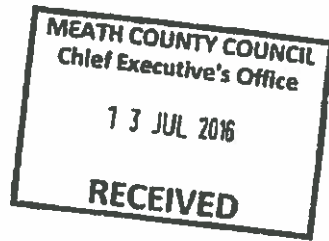
Sean,

Please find submission attached from South East Meath Chamber of Commerce.

Regards,
Margaret

*Margaret Carroll, Corporate Services, Meath County Council,
Railway Street, Navan, Co. Meath, C15 AW81*

*Tel: 046/9097013 Fax: 046/9097001
email: mcarroll@meathcoco.ie
web: www.meathcoco.ie*



SOUTHEAST **MEATH**
CHAMBER OF COMMERCE



13th July 2016

Mr Pat Gallagher
Senior Planner
Planning Department
Meath County Council
Navan
Co Meath

Re: Lands at Dunboyne North – Variation No 3 Meath County Development Plan.

Dear Mr. Gallagher

On behalf of the South East Meath Chamber of Commerce, I write to express our support for the development of the lands at Dunboyne North. These lands are located in the Dublin Metropolitan Area. We believe that it is critical for the economic development of South East Meath that these lands are developed as quickly as possible.

Many of the world's biggest and most dynamic companies have analysed the pros and cons of where to locate their businesses– and then chosen County Meath. Coca-Cola, Facebook, Generali and Smurfit Kappa are four examples of multinational companies already located in County Meath.

South East County Meath has an unrivalled location, has excellent lifestyle, is located beside Ireland's best universities, has a highly educated workforce, and is just twenty minutes from Dublin City centre, Dublin International Airport and Dublin Port.

South East Meath Chamber was set up in 2010 to promote the economic development of our area and to create jobs. Our objective is to make South East Meath the No. 1 place in Ireland to do business and since then we have been meeting with Embassies, International Chambers of Commerce, and International Real Estate Consultancies. At these meetings we have been told again and again that the companies who would locate in South East Meath not only want attractive campus style office parks, excellent communication and transport infrastructures, but the most critical factor for them is the availability of quality housing for their staff and schools and educational opportunities for their children.

52 Dunboyne Business Park, Dunboyne,
Co. Meath, Ireland. EU

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web www.southeastmeath.ie

Following these meetings, we are satisfied that the lands at Dunboyne North are highly attractive to FDI companies locating in Ireland and also for expanding indigenous companies.

Despite the amount of land zoned for housing, there is an inadequate housing stock available, and it is imperative that a limited number of houses (500) be made available in Dunboyne North as part of the development. We note that these lands are already zoned since 2009 for a level 2 retail centre, which would have included residential development. We fully support the proposed change in the current variation.

The attractiveness of our area has been proven by the decisions of Facebook, Shire Pharmaceuticals and Avoca to locate at Clonee / Dunboyne. Our area was chosen out of 30 to 40 possible global locations, and our proximity to Dublin Airport was a key deciding factor.

These lands present a tremendous opportunity for the creation of employment and economic activity, for the benefit of the local community, County Meath, the Metropolitan Dublin Area, the Greater Dublin Area and Ireland.

It is a recognised fact by global FDI professionals, that it takes one major investment into an area to start the initial FDI, and then there is a snowball effect which attracts more and more companies, which then creates a recognised business cluster or industry centre of excellence. For example: Pharmaceutical Companies in Cork, Car Manufacturing in North East England, Business Process Outsourcing in Krakow Poland, Aerospace Industries in Toulouse France.

If we do not have the lands available to bring in new companies to follow Facebook and Shire Pharmaceuticals, the FDI momentum we have built up will be broken, and we will not attract any new investment. This is especially critical now with the UK about to leave the EU. Almost all Companies with a European HQ in the UK, will be seeking to relocate to Amsterdam, Frankfurt or the Dublin Area. We want to be ready and able to bring these companies to South East Meath and create new jobs in Ireland and create opportunities for Irish people living abroad to return home.

Yours sincerely,

Kate Williams

Kate Williams

Secretary

Louise Heeney

From: Declan Brassil [declan@dbcl.ie]
Sent: 13 July 2016 16:37
To: variation3mcdp
Subject: Submission 1006 McGarrell Reilly
Attachments: Submission-McGarrell Reilly-Variation 3-13.07.2016.pdf; Cover Letter-V3 Submission-MGR-13.07.2016.pdf; Appendix 1-Systra Report.pdf; Appendix 2-RPS Report.pdf

Dear Sir/Madam

Please find attached herewith a Submission and cover letter in respect of the Draft Direction issued by the Minister in respect of Variation No. 3.

I look forward to receipt of confirmation of this submission.

Yours faithfully

Declan Brassil

Principal

Declan Brassil & Co.

Chartered Planning Consultants

Lincoln House, Phoenix Street,

Smithfield, Dublin 7,

D07 Y75P

Tel: 00353-1-8746153

email: declan@dbcl.ie

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Planning Section
Meath County Council
Buvinda House
Dublin Road
Navan
County Meath

13 July 2016

Re: Variation No. 3 to the Meath County Development Plan 2013-2019

Submission on the Draft Direction issued by the Minister for Environment, Community & Local Government – McGarrell Reilly Group

Dear Sir/Madam

The attached Submission is made on behalf of McGarrell Reilly Group of Garryard House, Earlsfort Terrace, Dublin 2, in response to Meath County Council's invitation for submissions on the Draft Direction issued in respect of Variation No. 3 to the Meath County Development Plan 2013-2019 MCDP. This cover letter has been drafted in consultation with Nuala Butler, SC.

The submission is made pursuant to the provisions of Section 31(7) of the Planning and Development Act, 2000 as amended in circumstances where my client has serious concerns as to the extent to which that statutory mechanism is capable of dealing with the situation which has arisen in this case and, by extension, whether that statutory mechanism has been appropriately invoked by the Minister in this instance. In view of the concerns expressed below to the effect that the Planning Authority (as distinct from the elected members of the Planning Authority) does not have the opportunity to make submissions to the Minister on the draft direction and the Minister's intention to issue same, it is expressly requested that this submission be furnished directly to the Minister in addition to being summarised in the statutory report to be prepared by the Chief Executive pursuant to Section 31(9).

As many of my client's concerns arise out of the structure of the legislative provisions under which the Minister can issue a direction which must be incorporated into a Development Plan regardless of the views of the Executive and/or the elected members of the Planning Authority, it is appropriate to outline those provisions at the outset. Briefly, the structure of Section 31 is as follows. Section 31(1) allows the Minister direct a Planning Authority to take specified measures required by the Minister in relation to a plan (which term is defined as including a variation to a development plan) where the Minister is of the

opinion, *inter alia*, that sufficient account is not being taken of submissions or observations made by the Minister to the Planning Authority in the course of the statutory process leading to the adoption of the plan or the plan is not in compliance with the requirements of the Act. Once issued, a Planning Authority is obliged to comply with the Ministerial direction and neither the Executive nor the elected members can perform any function in a manner that is inconsistent with the direction (Section 31(2)).

Therefore, prior to a direction issuing a Minister is obliged to give the Planning Authority notice of his intention and to furnish a draft of the direction which it is proposed to issue and the reasons therefor. This step is required to facilitate a consultation process taking place before the Minister reaches any final decision on whether the direction should issue. The notice is to be issued to the "Planning Authority" (Section 31(3)) and in addition the Minister is required to furnish a copy of the notice to the Chief Executive and Cathaoirleach of the Planning Authority (Section 31(5)). Thereafter, under Section 31(7) the Chief Executive of the Planning Authority is required to publish notice of the draft direction and invite written submissions or observations to be made to the Planning Authority which will be taken into consideration by the Minister before a direction is issued. The process does not envisage that submissions will be made directly to the Minister save in the limited circumstances of Section 31(10). Instead all submissions to be made by the public are channelled through the Planning Authority. The elected members of a Planning Authority are given an express statutory power to make a submission to the Minister under Section 31(10).

Under Section 31(8) the Chief Executive is obliged to prepare a statutory report on the submissions and observations received under Section 31(7)(c) which report is furnished to the Minister and to elected members of the Planning Authority. Under Section 31(9) that report must summarise the views of any person who made a submission or observation, the views and recommendations of the elected members, the views and recommendations of the regional assembly and, finally, it must "*make recommendations in relation to the best manner in which to give effect to the draft direction*". Thus the Planning Authority is charged with devising a method of giving effect to the Ministerial direction regardless of the views of the Planning Authority in relation to that direction.

The Minister must then consider the report furnished and the submissions made (Section 31(11)) and may appoint an inspector if it is felt necessary or appropriate to do so. Under Section 31(13) the inspector reviews the draft direction, the report and the submissions made, consults with the Chief Executive and the elected members of a Planning Authority, may consult with persons who made submissions and thereafter furnishes a report containing recommendations to the Minister. The Minister may decide to issue or not to issue the direction or to amend the direction (Section 31(16)). Legally, once the direction is issued it is deemed to have immediate effect and its terms are considered to be incorporated into the plan (Section 31 (17)).

These provisions are structured in such a way that the Planning Authority itself does not have any statutory power to make submissions to the Minister as to why the draft direction should not issue. Indeed, in making his or her report to the Minister the Chief Executive is obliged to summarise the views of the people who have made submissions and of the elected members but thereafter is required to make recommendations in relation to the best manner in which to give effect to the draft direction. This pre-supposes that the Chief Executive (*qua* executive of the Planning Authority) will be largely *ad idem* with the Minister in relation to the matters the subject of the direction. The statutory framework does not envisage – and therefore makes no allowance for – circumstances in which a Planning Authority, acting

through its Executive, makes considered and thought out proposals comprising a strategy for the proper planning and sustainable development of its functional area, which proposals are accepted by the elected members but rejected by the Minister.

It is submitted that the statutory scheme is clearly designed to deal with circumstances where the elected members of a Planning Authority have disregarded the views and advice of the Executive and either added to or deleted from a plan in a manner which renders the resultant plan inconsistent with the Planning and Development Act 2000. It is our understanding that in other instances where the Minister exercised his powers under Section 31 this was the factual scenario. To date, I am not aware of any instance where the Minister has proposed issuing a direction under Section 31 in circumstances such as these where the Executive of the Planning Authority has devised a plan utilising all of the professional expertise available to it and which, in its considered view comprises a coherent overall strategy for the proper planning and sustainable development of its functional area in a manner which complies with the Act and where the elected members have fully supported that proposal.

In the more usual circumstances of a divergence of views between the executive and elected members of a Planning Authority, the statutory scheme described above is appropriate as the views of the Minister and those of the Chief Executive will largely coincide. Therefore, the justice of the situation is met by expressly affording the elected members the opportunity to make submissions, which submissions will be summarised by the Chief Executive in his or her report to the Minister and may also be made directly to the Minister. Meanwhile, on the assumptions that the views of the Chief Executive and the Minister will coincide, it is appropriate that the Chief Executive make recommendations in the report to the Minister as to the best manner to give effect to the draft direction. However, here the Minister is proposing to issue a draft direction which is contrary not only to the variation as adopted by the elected members but also to the variation as originally drawn up by the Executive after a thorough consideration of the issues and a deliberate choice made following expert professional advice in relation to the future planning and development of this area. There is no logical basis for depriving the Planning Authority of the opportunity to contest the Minister's proposal to issue a direction and, it is submitted, a legislative scheme which does so is seriously defective.

It is noted that the Statement of reasons provided by the Minister for the draft direction identifies that submission was made to the Planning Authority on behalf of the Minister on 26th January 2016 on the proposed Variation No. 3 and on 19th April 2016 on the Material Alterations to the variation "*which advise the Council to remove the proposed residential content/zoning at pace, North of Dunboyne and to ensure that there was proper traffic and transport assessment of all development policies in order for the proposals to accord fully with ministerial and planning guidelines*". The submissions made by the Minister on 19th April 2016 were required by statute to be submissions on the Material Alterations to proposed Variation No.3. The submission of 19 April 2016 included a submission on the proposed "Live Work" community at Dunboyne North which was not the subject of any of the proposed Material Alterations. Consequently, this portion of the submission was not considered by the Planning Authority on the basis of legal advice.

Insofar as the Ministerial direction now appears to be premised on the contention that the Planning Authority ignored or did not take sufficient account of the submissions made by the Minister, this gives rise to a significant legal flaw in the direction. The Minister made submissions on an issue which was not the subject of a material alteration and, thus, upon which there was no statutory basis for further

consultation. The Planning Authority correctly did not take that submission into account. Such a failure cannot be characterised as ignoring this submission or of not taking sufficient account of it. Insofar as the Minister persists in relying on the submission of 19th April 2016 this places the legal basis for the direction in some considerable doubt.

It is noted that the submission made by the Minister on 26th January 2016 (referenced as submission 1118) is considered in full in the report of the Chief Executive on submissions received in respect of proposed Variation 3 dated 23 February 2016. The rationale of the Planning Authority is clearly explained in the Chief Executive's response. In particular, the Planning Authority's rationale in respect of the "Live Work" community of Dunboyne North is explained in part by reference to the existence of the M3 Parkway railway station in the vicinity and the fact that all areas of land proposed to be zoned in Dunboyne North for the creation of a Live Work community are within 600 metres of the rail station. Thus, in the view of the Planning Authority, the proposal accords with the relevant guidelines and complies with the Act.

In the Draft Direction currently proposed and the reasons given therefor, the Minister is essentially restating the submissions already made without engaging with the rationale offered by the Chief Executive in defence of the original proposal. The Minister's stated concern that the zoning proposed in Variation No. 3 would not be consistent with the core strategy of the current Meath County development Plan completely overlooks the fact that the variation is intended to alter that core strategy and therefore, by definition, will be consistent with it. Significantly, the reasons given for the draft direction focus on the potential impact of the zoning on the adjacent motorway/motorway junction and do not even reference the fact that there is an existing, operational railway station in the immediate vicinity of the subject lands. In the circumstances the reasons offered for the proposal to issue a Direction, by virtue of the failure to address the Planning Authority's underlying rationale for the proposed re-zoning, are inadequate and irrational.

Under Section 31(4)(b) the notice to be served by the Minister is to inform the Planning Authority of, *inter alia*, the intention of the Minister to issue a direction to the Planning Authority "to take certain measures specified in the notice in order to ensure that the plan is compliant with the requirements of this Act, and, in the case of a plan, sets out an overall strategy for the proper planning and sustainable development of the area". In preparing Variation No.3 to the development plan, the executive of the Planning Authority acted on the basis that they were satisfied that the plan and the variations thereto set out an overall strategy for the proper planning and sustainable development of the area. Variation No.3 in its own right clearly articulated a strategy for the proper planning and sustainable development of the Dunboyne area. These matters are addressed in detail in the attached submission.

The changes proposed by the Minister in the draft direction and, in particular, the reversion of the zoning of the subject lands designed to facilitate the creation of a "Live Work" community in proximity to the M3 Parkway station and their return, by way of default, to the zoning attaching to these lands under Variation No.2, means that a key element of the overall strategy for the proper planning and sustainable development of the area has been removed. The Draft Direction, by merely replacing elements of Variation 3 with which the Minister considers to be inappropriate with pre-existing elements (which also permit of significant development at this location) fails to set out an overall strategy for the proper planning and sustainable development of the area, removes appropriate uses from adjacent to a rail station while retaining 70 ha of car based employment uses on the opposite side of the M3 distant from the rail station, whilst, at the same time, undermining the strategy adopted by the Planning Authority.

Further, the reasons offered for the proposal to issue a direction include the observation that the Retail Strategy for the Greater Dublin Area is due to be renewed in the imminent preparation of a Regional Spatial and Economic Strategy and suggests the designation of the lands for long term Level 2 retail development is likely to be reviewed. The zoning under Variation No.2 to which the direction would require the subject lands to revert is expressly designed to give effect to the designation as a Level 2 retail centre. It is unclear how reversion to a zoning which the Minister appears to believe will not survive the review of the Retail Strategy can represent an "overall strategy for the proper planning and sustainable development of the lands". The direction itself does not set out any such overall strategy and thus the proposed direction fails to meet the requirements of the Act.

In addition, in this context the direction also interferes with and prejudices the outcome of the review of the Retail Strategy. It is noted that the preparation of the Regional Spatial and Economic Strategy is a function of the Eastern and Midland regional Assembly and not of the Minister.

It is important in this context to bear in mind that this direction is not focused upon a change made by the elected members to a "compliant" plan as prepared by the executive of the Planning Authority and which the Minister seeking to return to a compliant state. Instead, the Minister is purporting to adopt a wholly different overall strategy to that adopted by the Planning Authority and wants the Planning Authority to give effect to this by the piecemeal de-zoning of certain lands and their reversion to a zoning held as part of a different overall strategy. In the circumstances, it is very difficult to understand how the Minister could believe that the Direction, firstly, contains an overall strategy for the proper planning and sustainable development of the area and, secondly, if effect is given to it, could achieve the proper planning and sustainable development of the area.

Further, it is evident from the submission made on behalf of the Minister to the Planning Authority on the 26 January 2016 that the Minister has concerns with any development of the subject lands at Pace in the absence of an evidence base or of a traffic assessment of the impact of such development on the adjoining roads (namely the R157 and the M3 motorway). Equally, it is clear that the Minister is concerned at any residential development being allocated to Dunboyne North contends instead that development should extend from the established urban area to the south and east. The lack of logic from a planning perspective underpinning this submission is addressed in the attached submission as no substantive account appears to be taken by the Minister of the existing rail station or the distances of the subject lands to the established town.

However, what is material from a legal perspective is that the development permitted under the zoning attached to the lands by Variation No. 2 has a similar if not greater capacity to effect the adjoining roads as that permitted by the zoning which the Minister has directed must be removed. The Direction given by the Minister appears inconsistent with the submission and will not suffice to achieve the underlying rationale of that submission.

Indeed this gives rise to a further legal concern as to the validity of the approach now being taken by the Minister. It is significant to note that the subject lands have been zoned for significant development in the Dunboyne/Clonee Pace LAP 2009-2015 and the Meath County Development Plan 2013-2019, the terms of which are relied on by the Minister to contend that development should only take place to the south and east of Dunboyne town. The Minister has had a power similar to that now reflected in the current text of Section 31 since 2000 but has never sought to exercise this power in respect of the earlier plans. The concerns expressed by the Minister in the submission of 26 January 2016, if valid, would apply

equally to the zoning of the subject lands under Variation No. 2 (to which the Minister wishes to revert) and the LAP. However, the Minister is not purporting to direct that Variation No. 2 be reversed nor any previous zoning of the lands. This is not surprising as there could be serious legal concerns as to the validity of a Direction made under Section 31 which purported to require a Planning Authority to alter a plan made years earlier which had not been the subject of any direction at the time it was made.

I trust that the Planning Authority will afford due regard to the matters raised above and in the attached submission, and I look forward to a favourable outcome.

Yours sincerely



Declan Brassil
Declan Brassil & Co.



Submission to Meath County Council

in respect of the:

**Draft Direction issued by the Minister for
Environment, Community & Local Government
Variation No. 3 to the Meath County Development
Plan 2013-2019**

On behalf of:

McGarrell Reilly Group,

Garryard House,
Earlsfort Terrace,
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1.0 INTRODUCTION

This Submission is made on behalf of McGarrell Reilly Group of Garryard House, Earlsfort Terrace, Dublin 2, in response to Meath County Council's invitation for submissions on the Draft Direction issued in respect of Variation No. 3 to the Meath County Development Plan 2013-2019 MCDP. McGarrell Reilly Group is a major stakeholder in the lands the subject of the Draft Direction, being the owner of the lands identified on Figure 1.1.

This submission has been prepared by Declan Brassil & Co, Chartered Planning Consultants with specialist expertise provided by the following Practices:

- Systra Consultant Transportation Engineers
- RPS Consulting Engineers,
- Ciaran Ferrie Architects

1.1 Overview of Procedural Matters

A number of substantive procedural matters are addressed in the cover letter accompanying this submission. This document addresses the technical planning matters raised in the Draft Direction noting the specific requirements of section 31(4) of the Planning and Development Act, 2000, as amended, which provide a relevant context for the assessment of this submission.

Under Section 31(4)(b) the notice to be served by the Minister is to inform the Planning Authority of, *inter alia*, the intention of the Minister to issue a direction to the Planning Authority 'to take certain measures specified in the notice in order to ensure that the plan is compliant with the requirements of this Act, and, in the case of a plan, sets out an overall strategy for the proper planning and sustainable development of the area'. In preparing Variation 3, the Executive acted on the basis that they were satisfied that the plan and the variations thereto set out an overall strategy for the proper planning and sustainable development of the area. Variation 3 in its own right clearly articulated a strategy for the proper planning and sustainable development of the Dunboyne area which is addressed in detail below.

The changes proposed by the Minister in the Draft Direction and, in particular, the reversion of the zoning of the subject lands, by default, to the zoning and objectives attaching to these lands under Variation No.2, means that a key element of the overall strategy for the proper planning and sustainable development of the area has been removed. The Draft Direction, by merely replacing elements with which the Minister considers to be inappropriate with pre-existing objectives which also permit of significant development at this location and which the Draft Direction also infers are inappropriate, fails to set out an overall strategy for the proper planning and sustainable development of the area whilst, at the same time, undermining the strategy adopted by the Planning Authority.

It is important to note that the Draft Direction is not focused upon a change made by the elected members to a "compliant" plan as prepared by the Executive of the Planning Authority and which the Minister seeking to return to a compliant state. Instead, the Minister is purporting to adopt a wholly different overall strategy to that adopted by the Planning Authority and wants the Planning Authority to give effect to this by the piecemeal de-zoning of certain lands and their reversion to a zoning held as part of a different overall strategy. In the circumstances, it is very difficult to understand how the Minister could believe that the Direction, firstly, contains an overall strategy for the proper planning and sustainable

development of the area and, secondly, if effect is given to it, could achieve the proper planning and sustainable development of the area.

This gives rise to a further legal concern as to the validity of the approach now being taken by the Minister. It is significant to note that the subject lands have been zoned for significant development in the Dunboyne/Clonee/Pace LAP 2009 and the Meath County Development Plan 2013-2019. The Minister has had a power similar to that now provided for under Section 31 since 2000 but has never sought to exercise this power in respect of any of the earlier plans. The concerns expressed by the Minister in the submission of 26 January 2016, if valid, would apply equally to the zoning of the subject lands under Variation 2 to which the Minister wishes to revert and the LAP. However the Minister is not purporting to direct that Variation 2 be reversed nor any previous zoning of the lands. This is not surprising as there could be serious legal concerns as to the validity of a Direction made under Section 31 which purported to require a Planning Authority to alter a plan made years earlier which had not been the subject of any direction at the time it was made.

Further, the reasons offered for the proposal to issue a direction include the observation that the Retail Strategy for the Greater Dublin Area is due to be renewed in the imminent preparation of a Regional Spatial and Economic Strategy and suggests the designation of the lands for long term Level 2 retail development is likely to be reviewed. The zoning under Variation No 2 to which the direction would require the subject lands to revert is expressly designed to give effect to the designation as a Level 2 retail centre. It is unclear how reversion to a zoning which the Minister appears to believe will not survive the review of the Retail Strategy can represent an "overall strategy for the proper planning and sustainable development of the lands". The direction itself does not set out any such overall strategy and thus the proposed direction fails to meet the requirements of the Act.

In addition, in this context the direction also interferes with and prejudices the outcome of the review of the Retail Strategy. It is noted that the preparation of the Regional Spatial and Economic Strategy is a function of the Eastern and Midland regional Assembly and not of the Minister.

In those circumstances, reverting to the Variation 2 zoning and objectives does not represent a coherent overall strategy, particularly in circumstances where the Draft Direction expressly questions the viability of the zoning objectives and inferred that they may be rendered obsolete following the review of the regional guidelines. Section 31(4)(b) requires the Draft Direction to set out '*an overall strategy for the proper planning and sustainable development of the area*'. The Act places an obligation on the Minister to advance zonings and related objectives, or otherwise, which the Minister considered to represent a coherent strategy. By reverting to zoning and objectives which the Direction has undermined, the Variation as amended by the Draft Direction cannot be said to set out a strategy for the proper planning and sustainable development of the area and as such the Draft Direction has failed to meet the requirements of the Act.

The Draft Direction sets out detailed reasons as to why the Minister considers that the Variation doesn't comply with the requirements of the Act. However, it doesn't set out a plan that the Minister considers to be compliant or the basis on which that plan complies with the proper planning and sustainable development of the area having regard to those sections of the Act, Guidelines and planning considerations cited in relation to Variation 3. That information was required to be set out in the Draft Direction and on that basis the Direction is defective and does not meet the requirements of section 31 of the Act.

1.2 Structure of the Report

This submission is structured as follows:

Section 2 addresses the status of Dunboyne as a Large Growth Town in the Metropolitan Area of the National Gateway City and GDA; the performance of the County and the town in meeting their respective national and regional development objectives; and, the identified role for the North Dunboyne lands to meet these objectives as expressed in Core Strategy and Variations 1, 2 and 3 of the Meath County Development Plan.

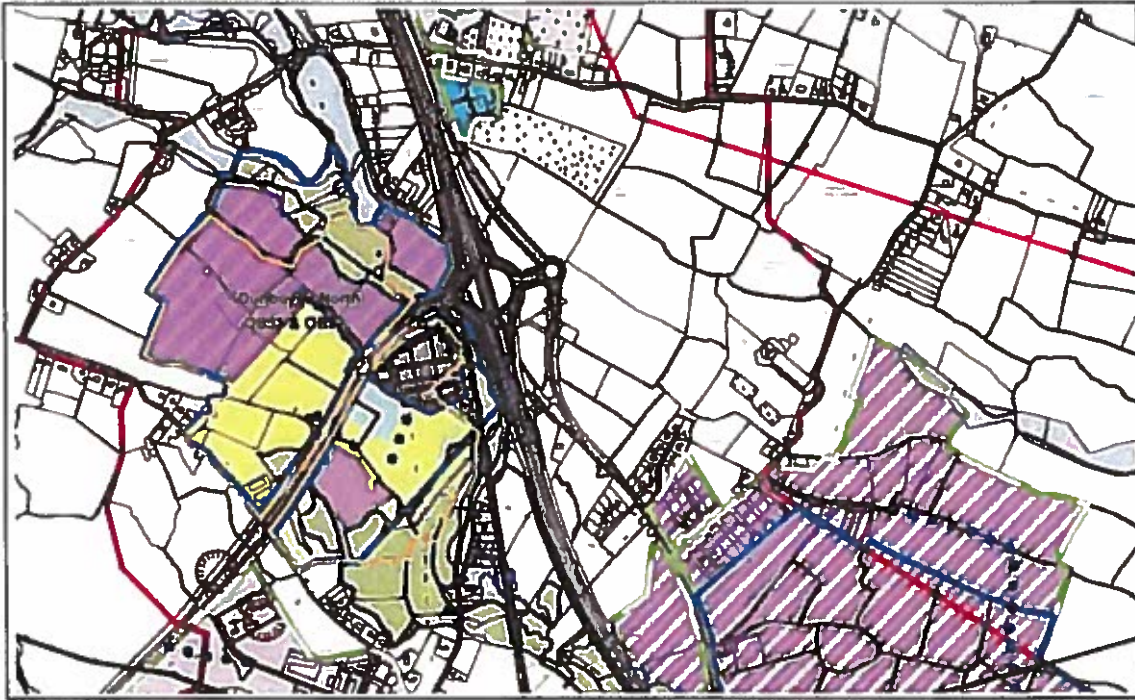
Section 3 provides a high level analysis of opportunities and constraints for growth in the Dunboyne area, and sustainable expansion options having regard to the level of growth targeted under the town's regional level objectives. This analysis identifies North Dunboyne as a sustainable, infill, urban expansion area, centred on a multi-modal transportation node, that it represents the optimum location for mixed use urban expansion required under regional policy; and that it is inevitable and imperative that significant urban expansion occurs at North Dunboyne consistent with the sustainable development principles provided for in Variation 3, namely the plan-led, integrated, connected, sustainable expansion of the settlement.

Section 4 summarises the relevant planning matters cited in the Draft Direction upon which it relies to underpin the proposed amendments to Variation No. 3, and provides a point by point analysis of those reasons. This assessment concludes that the facts on which the Draft Direction relies are incorrect or inaccurate, or rely on an interpretation of policy and fact which are not sufficient or sustainable having regard to both the wider strategic and site specific contexts.

Section 5 prepared by RPS Consulting Engineers addresses connectivity of the lands to the rail station and town centre and concludes that the development of the zoned development can be planned at detail scheme stage, to ensure that connectivity will not be impacted by the 1:100 year flood event.

Section 6 provides a summary and conclusion. The simple analysis is that it is inevitable that significant urban expansion will occur at North Dunboyne. It is appropriate and consistent with all relevant principles of proper planning and sustainable development that such plan-led expansion is accommodated. Variation 3 facilitates that process. The effect of the Draft Direction, and its inference in respect of the status of the Level 2 Centre objectives, is to preclude plan-led and sustainable development happening indefinitely to the detriment of the GDA Metropolitan Area, the county, the town, its hinterland and its resident population, and the achievement of national and regional development objectives.

Figure 1.1 Site Location identifying McGarrell Reilly Lands (yellow outline)



Source Meath County Development Plan 2013-2019 - Variation No. 3

2.0 OVERVIEW - STATUS OF DUNBOYNE

At national and regional level, Dunboyne is situated within the Metropolitan Area of the National Gateway City and Core Economic Area. It is the only settlement in Meath within the Metropolitan Area of the Greater Dublin Area.

Dunboyne is designated in the Regional Planning Guidelines for the Greater Dublin Area 2010 - 2022, as a Large Growth Town II and a Secondary Economic Growth Town within the Metropolitan Area. A Large Growth Town II is described as 'strong active growth towns, economically vibrant with high quality transport links to larger towns/city' of approximately 15,000 to 30,000 persons. The current population of Dunboyne is 6,950.

The Dunboyne, Clonee & Pace Local Area Plan 2009-2015 (LAP) set out a framework plan for how the 'corridor' should develop in order to achieve the regional and county level development objectives:

'The combined urban populations of Dunboyne and Clonee was recorded at 6,713 (Dunboyne: 5,713 and Clonee: 1,000) in the 2006 Census. The County Development Plan has indicated that 3,550 households will be allocated to the Corridor over the life of the Development Plan i.e. by 2013. The County Council considers that there is potential to accommodate a further 4,500 households in the 2013-2019 Development Plan period. The medium term population horizon for Dunboyne/Clonee/Pace corridor is 25,000 people. It is the policy of the Retail Strategy for the Greater Dublin Area that Dunboyne will develop from a Level 3 to a Level 2 centre over a 15 to 20 year timeframe.' [Emphasis added]

Following the expiration of the LAP, the framework objectives provided for under the LAP were incorporated into the County Development Plan by way of Variation No. 2.

The Retail Strategy for the Greater Dublin Area 2008 – 2016, designates Dunboyne as a Level 3 Town/District Centre and Sub-County Town Centre with the potential to grow to Level 2 Town Centre by 2028. This objective from the Retail Strategy for the GDA is incorporated into the Regional Planning Guidelines for the GDA (Figure 8 – Retail Hierarchy), which states that '*Dunboyne will gradually develop over the next 20 years towards level 2 status*'. The Level 2 Town Centre status is at the same level as Navan, Blanchardstown, Tallaght and Dundrum and would require in the order of 50,000 sq m of new retail development over the period of the RPG strategy 2008-2028.

The County Development Plan also designates Dunboyne as a Secondary Economic Growth Town under the Development Plans' Economic Development Strategy. The RPGs state:

'Dunboyne, a large growth town II in the metropolitan area, has yet to realise its long term potential but plays an important role in this economic growth area given its status and location on a developing rail line. It is also located strategically on the edge of the Gateway Core in an area with a high FDI presence. The designation of Dunboyne within the GDA retail hierarchy illustrates the economic potential of the town over a designated time span. This economic growth area experiences high levels of outward commuting patterns to the Dublin area, and it is important that economic stimuli measures are underpinned by necessary infrastructure investment, particularly in relation to water and waste water services.' [Emphasis added]

The RPGs for the GDA position Dunboyne to capitalise on the dynamics which have driven massive levels of inward investment in economic development, employment creation, commercial and retail development, community building and infrastructure on the Fingal side of the county boundary and more recently on the Meath side. The north Dunboyne area has recently benefitted from major inward investment from Facebook, Shire and Avoca, and is now providing a national level focus for Foreign Direct Investment (FDI). These announcements will in turn create a dynamic for further FDI and domestic investment and create a demand for high quality and highly integrated residential and work communities and supporting infrastructure.

For Dunboyne to fulfil its Regional level objectives by 2028, being the period of the current and next County Development Plans, a population increase of in the order of 18,000 must be accommodated, requiring approximately 6,700 additional residential units. This level of population growth must be accompanied by significant additional employment generating floorspace, and supporting services, community, educational, recreational etc. infrastructure.

2.1 Overview - Status of North Dunboyne

North Dunboyne¹ has the distinction of being located at a multimodal location with a rail station, park and ride, bus facilities, and motorway interchange. The area is adjacent and highly accessible to the established urban area, with significant potential for enhanced connectivity and integration (Refer to

¹ The Draft Direction refers to North Dunboyne as 'Pace'

Figures 2.1 and 2.2. The recent investments by Shire, Avoca and Facebook now establish North Dunbooyne as an 'infill' opportunity site, centred on a multi-modal interchange.

Figure 2.1 Existing and Planned Connectivity

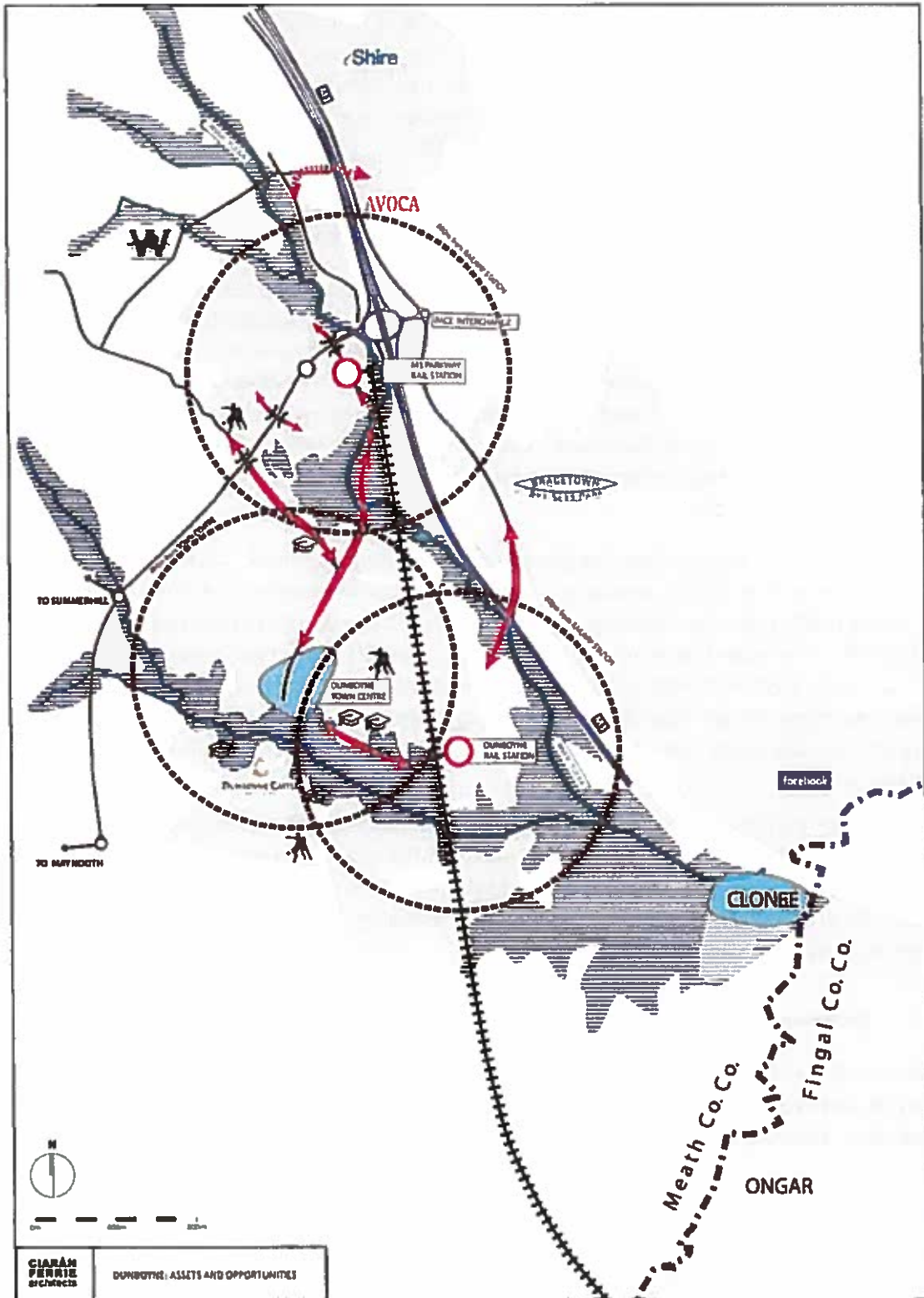
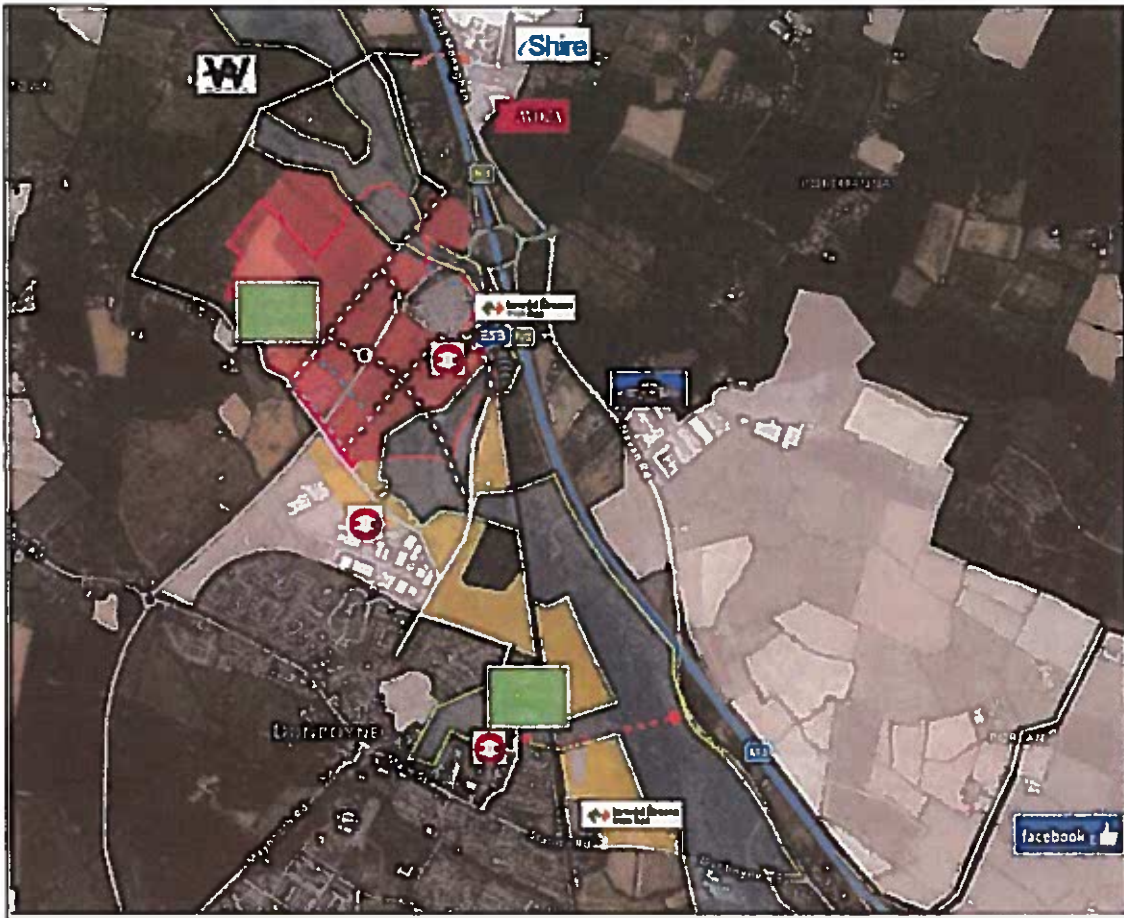


Figure 2.2 Existing and Planned Connectivity



Meath County Development Plan 2013-2019, as originally adopted, identifies *'unparalleled economic development opportunities'* adjacent to Dunbooyne North which would *'allow the development of a strategic employment cluster'*. Development Plan encourages *'mixed use settlement forms and sustainable centres, in which employment, residency, education and local services / amenities are located in close proximity to each other'* while also seeking to *'position Dunbooyne to positioning of Dunbooyne to gradually grow to a Level II Town Centre by 2028'*.

The zoning and related objectives attaching to the lands under both Variations 2 and 3 acknowledge the strategic potential of the area to deliver plan-led regional and county level planning objectives providing a sustainable mixed use 'live work' employment, residential, retail, community and supporting uses.

Variation 2 identified two zoning objectives for the subject site corresponding with Pace Objective 1 and Pace Objective 2. Pace Objective 1, which the Draft Direction proposes be reinstated, establishes the following land use and development principles:

- *'high end office based employment.....'*
- *'high density and other appropriate residential..'*
- *'retail floorspace and associated facilities*

Pace Objective 1 also provides for high level employment and residential development provision within the identified Level 2 Centre lands.

Pace Objective 1 acknowledged that the 'new-urbanism' mixed use development model, particularly at high capacity transportation nodes, delivers the most sustainable development outcomes.

The White Lands and Pace Objective 2 provides 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.'* [Emphasis Added].

Variation No. 2 to the MCDP restated and reinforced the Council's commitment in the County Development Plan to the lands as the most suitable location to provide for an integrated expansion of the Dunboyne Town Centre and urban area.

2.2 Performance of County Meath and Dunboyne in Meeting Regional Development Objectives

The Housing Strategy contained in the current Development Plan aligns with the population and housing targets set out in the Regional Planning Guidelines for the Greater Dublin Area 2010-2022. The projected population of Meath is 195,898 persons in 2016, rising to 210,260 persons by 2022. The housing targets for Meath set out in the Regional Planning Guidelines, are 79,729 units for 2016 and 95,458 units for 2022. This is equivalent to a requirement for an additional 8,211 housing units in the years 2013-2016 and an additional 7,402 units in the years 2017-2019.

The Two-Year Progress Report on Realising Objectives prepared by Meath County Council in respect of the County Development Plan acknowledges that *'the rate of house completions in Meath has plummeted from their record high of 3,886 units in 2005 to a record low of 286 units in 2013. There has been no multiple house development of any note developed in Meath since the County Development Plan 2013-2019 was prepared and took effect.'* The Progress Report states:

It [Housing Strategy in the County Development Plan] projected that in 2012, 1,821 units would be completed, in 2013, 1,931 units would be completed and that in 2014, this would rise further to 2,006 units. The reality is that only 353 units were constructed in 2012 and 286 units constructed in 2013. 92 units were constructed in the first quarter of 2014 and it would appear that the total figure for 2014 will broadly reflect that of the past 3 years with nearly all construction activity consisting of individual dwellings outside of urban centres.'

As such, in the period 2012-2014 c.1,000 of the 5,479 required units were completed, resulting in a shortfall of c.4,700 units on the delivery of the core strategy to date. Commencement Notices for 13 no. dwellings have issued in Dunboyne since 2014 despite the town benefitting from Metropolitan Area growth town status and 2 no rail stations.

The Progress Report notes that Meath is failing to meet Regional Settlement and Economic Objectives as identified in the RPG's for the wider County and for Dunboyne. Whilst the overall strategies and objectives contained in the various plans remain robust and sustainable, the projected timeline for their implementation is uncertain due to significant private sector development initiatives having been almost completely absent over the past number of years.

2.3 Stated Purpose of Variation No. 3

The stated key purpose of Variation No. 3 of the County Development Plan is '*to align the County Development Plan with the key tenets of the Economic Development Strategy for County Meath 2014 – 2022 as they relate to statutory land use planning*'.

The Economic Development Strategy for County Meath 2014-2022 sets out the medium-term strategy for economic development within County Meath until 2022 and was prepared in response to the recommendations set out within Putting People First (2012) and the Local Government Reform Act of 2014².

Putting People First requires Local Authorities to take a more proactive approach to facilitating enterprise and economic development in addition to local and community development. The Economic Strategy 2014-2022 is also mindful of the wider regional context of economic and employment development in Meath and neighbouring local authority areas.

The Economic Strategy identified that existing trends within the County which impact on the economic performance of the County include:

- Narrow base of economic activities in largely traditional areas,
- FDI deficit;
- Low penetration of knowledge orientated activities; and
- Substantial skills leakage due to commuting trends from the County

A key challenge identified by the Economic Strategy is to ensure more jobs are available within Meath for its residents and that the County is seen as a place to invest in as well as live and visit. The Economic Strategy examines investment factors and decisions aimed at transforming the employment base to a more sustainable growth path up to 2022 as well as highlighting measures and practices required to sustain success.

With specific reference to Dunboyne North, the Economic Strategy notes '*overall, the Pace site represents a key opportunity for high-density employment within the Metropolitan Area of Meath. It benefits from both strong public transport connections together with direct access to the M3 and has the potential to play a significant role in accommodating employment generating development within the county*' [Emphasis added]. The Strategy identifies North Dunboyne as one of the five Key Economic Development Sites in County Meath.

Variation No. 3 aligns the policies and objectives contained in Volume 1 and Volume 5 of the Development Plan with the key tenets of the Economic Development Strategy for County Meath, 2014-2022.

In particular, Variation No. 3 seeks to provide an appropriate policy base to realise the significant economic development potential which exists in North Dunboyne having regard to its location within the National Gateway, its proximity to an existing public transport interchange and its proximity to the national motorway network. Variation No. 3 introduced a revised land use zoning map for North Dunboyne to

² Putting People First requires Local Authorities to adopt an economic development plan in conjunction with the overall City/County Development Plan to guide economic development action and provides that any such local economic development plan will align with, and form an implementation mechanism for, the Regional Spatial and Economic Strategy. The Local Reform Act gives legal effect for the reforms set out in Putting People First, including the economic development functions assigned to Local Authorities

provide for the creation of a sustainable new community with provision for a suitable mix of land uses to stimulate the sustainable economic development of the area. The land uses envisaged under Variation No. 3 includes a mix of employment, residential, community, educational and recreational uses which will be masterplan led and phased to the agreement of the Planning Authority.

3. CONSTRAINTS AND OPPORTUNITIES FOR THE PLANNED GROWTH OF THE DUNBOYNE URBAN AREA

As noted above, regional policy requires Dunboyne to accommodate significant growth over the period to 2028 and beyond, with population expanding from a current level of 7,000 to 25,000; retail functions evolving to Level 2 status requiring c20-30,000 sq m additional retail space; and supporting employment, educational, healthcare, community, recreational and ancillary uses provided to support a sustainable community. This section provides a high level analysis of the Dunboyne area, identifying constraints, opportunities and sustainable expansion options for the settlement having regard to the level of growth targeted under the town's regional level objectives.

The following land use requirements have been assumed based on the regional level growth targets:

- Employment (office based on west side of M3): = 40 ha
- Residential: 6,700 units @ 30 dph net + 15% Open Space = 268 ha (66 ha currently zoned)
- Schools and Community: 3 no primary & secondary school campuses + community facilities = 20 ha
- Retail: 20-30,000 sq m = 15 ha
- Recreational: 3.2 ha per 1,000 population (CDP) – 5.5ha Children Play Area; 16 ha Urban Park; 21 ha Playing Fields = 46 ha
- Healthcare: 10 ha
- Services and Ancillary: 20 ha
- Total Land Budget: 419 ha

3.1 Strengths & Constraints to Future Development of the Dunboyne Area

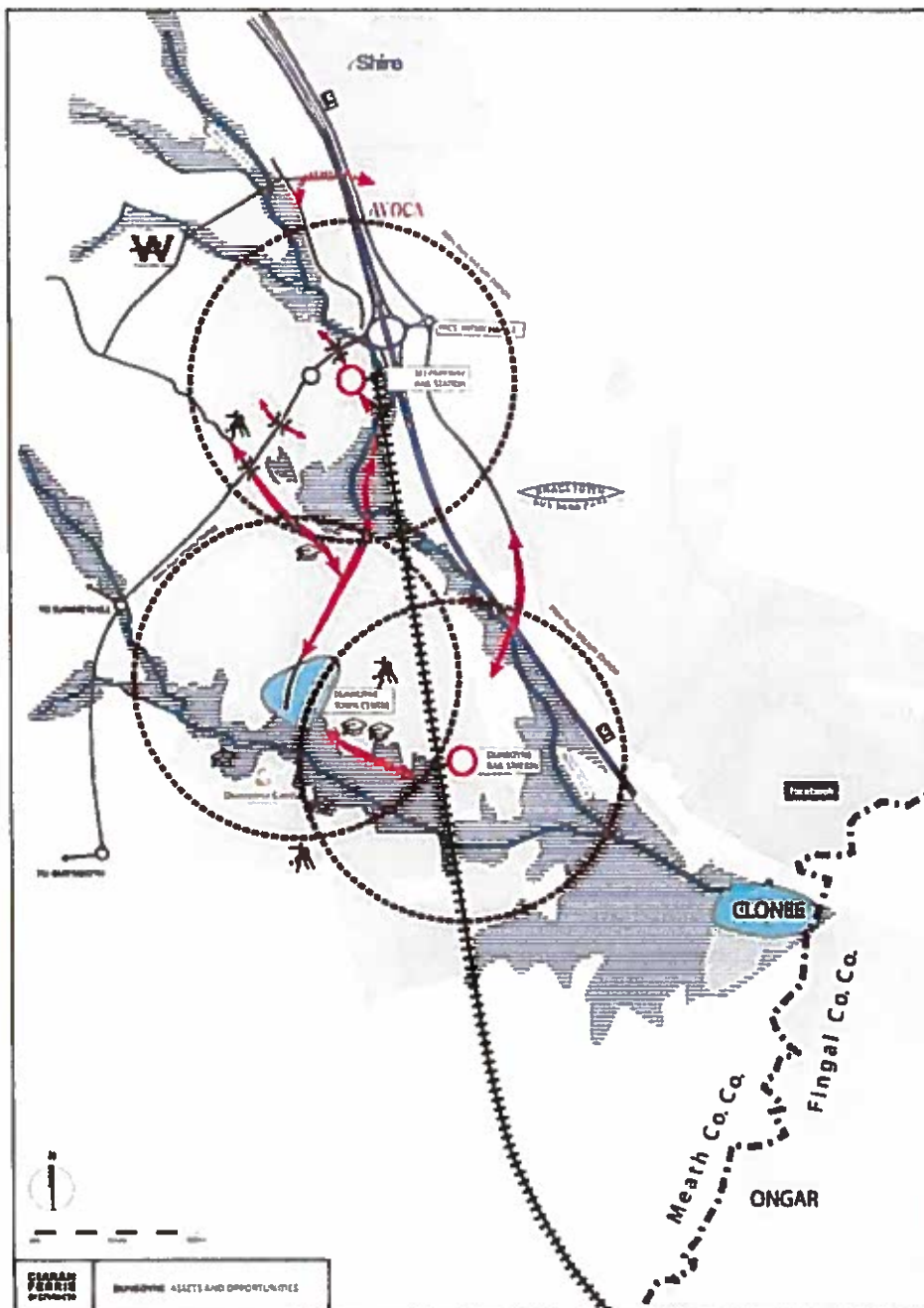
The strategic attributes of Dunboyne to accommodate regional level growth are well articulated in regional and county level policy, and based on a high level analysis of its context, and include:

- its regional status;
- its unique position in the County being the only settlement serviced by rail and benefitting from two rail stations providing regular services to the City Centre,
- its three distinct nodes, namely Dunboyne Rail Station, Dunboyne Town Centre, and Pace Rail Station, which provide opportunities to integrate further settlement expansion with easy access to public transportation, employment, community facilities and open space provision.
- the absence of constraints to development around Pace rail station which represents a sustainable 'infill site',
- a Park & Ride facility for 1,200 cars;
- the M3 interchange;
- its proximity, accessibility and connectivity to the established urban area;
- its highly skilled workforce with high educational attainment levels – 30% of population of Dunboyne have attained a 'Degree Level' educational qualification or higher; and

- recent investment demonstrate the attractiveness of the area to foreign direct investment and will assist in attracting further FDI to the area.
- the presence of major employment nodes in the immediate vicinity including Bracetown Business Park, Shires, IBM, Altech, Facebook and Kepak.
- the development of an Avoca outlet will raise the profile of the area, enhance 'quality of life' for residents and employees in the area, and enhance the attractiveness of the area for further FDI.

The asset base of the town which supports and accommodates its future expansion are identified on Figure 2.3, below.

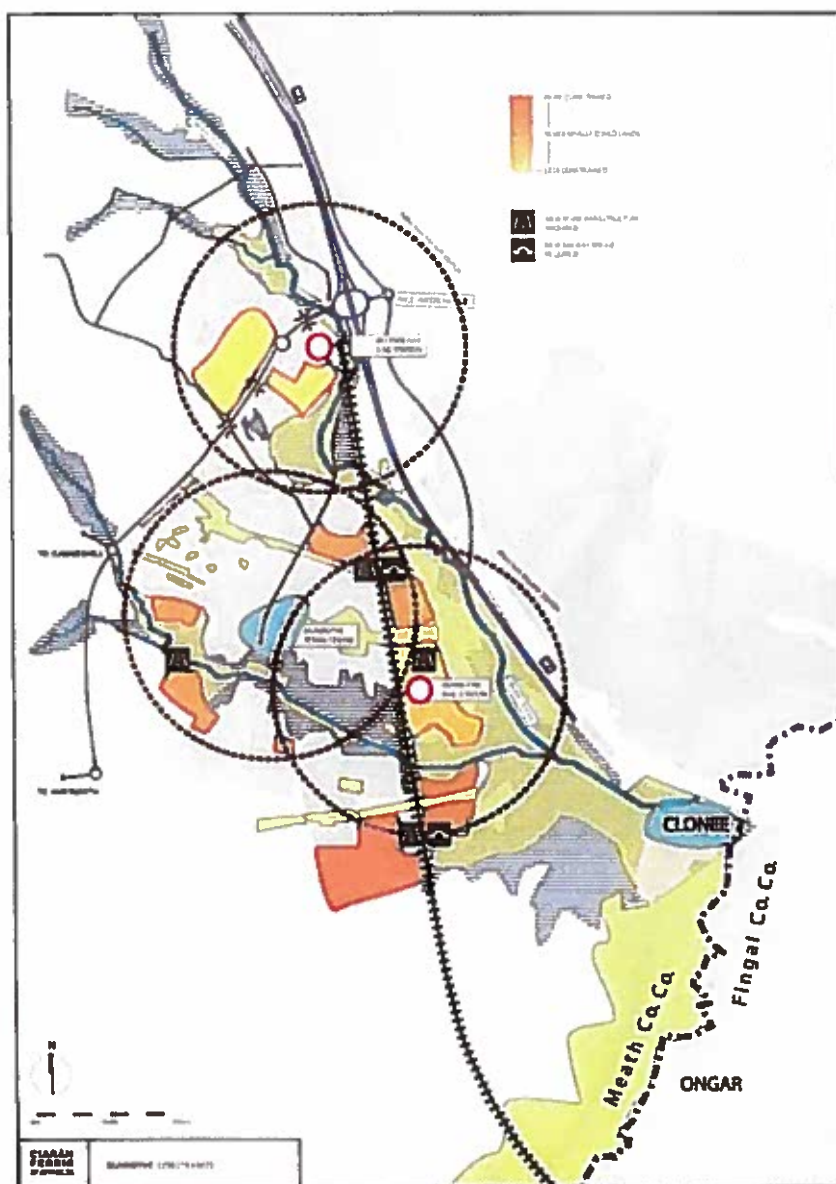
Figure 2.3 The Asset Base of the Town which Supports and Accommodates Future Expansion.



The constraints to the expansion of the urban area are identified on Figure 2.4 and include:

- The River Tolka and its associated floodplain constrain expansion eastward.
- The Rail Line and Motorway provide strong barriers to movement which limit the connectivity of lands to the east of the rail line and Motorway to the existing public transport nodes and the established urban area. Vehicular and pedestrian bridges and significant new road infrastructure are required for lands to the east of the rail line
- The proximity of Clonee village to the east and the urban area of Blanchardstown/Clonsilla/Ongar to the south and south east require that a greenbelt between the urban areas is maintained between the respective settlements to provide a physical and visual separation, to prevent coalescence and to retain the identities of Clonee and Dunbooyne.
- The increasing distance of undeveloped areas to the south from the established rail stations and the town centre constrains development to the south.

Figure 2.4 Constraints to the Expansion of the Urban Area:



3.2 Expansion Options

Having regard to the above opportunities and constraints, the following expansion options are represented graphically:

Figure 2.5: The sustainable development option focussed on a balanced development around the two rail nodes and town centre, all inter-connected, and infilling to the employment areas east of the M3 Motorway.

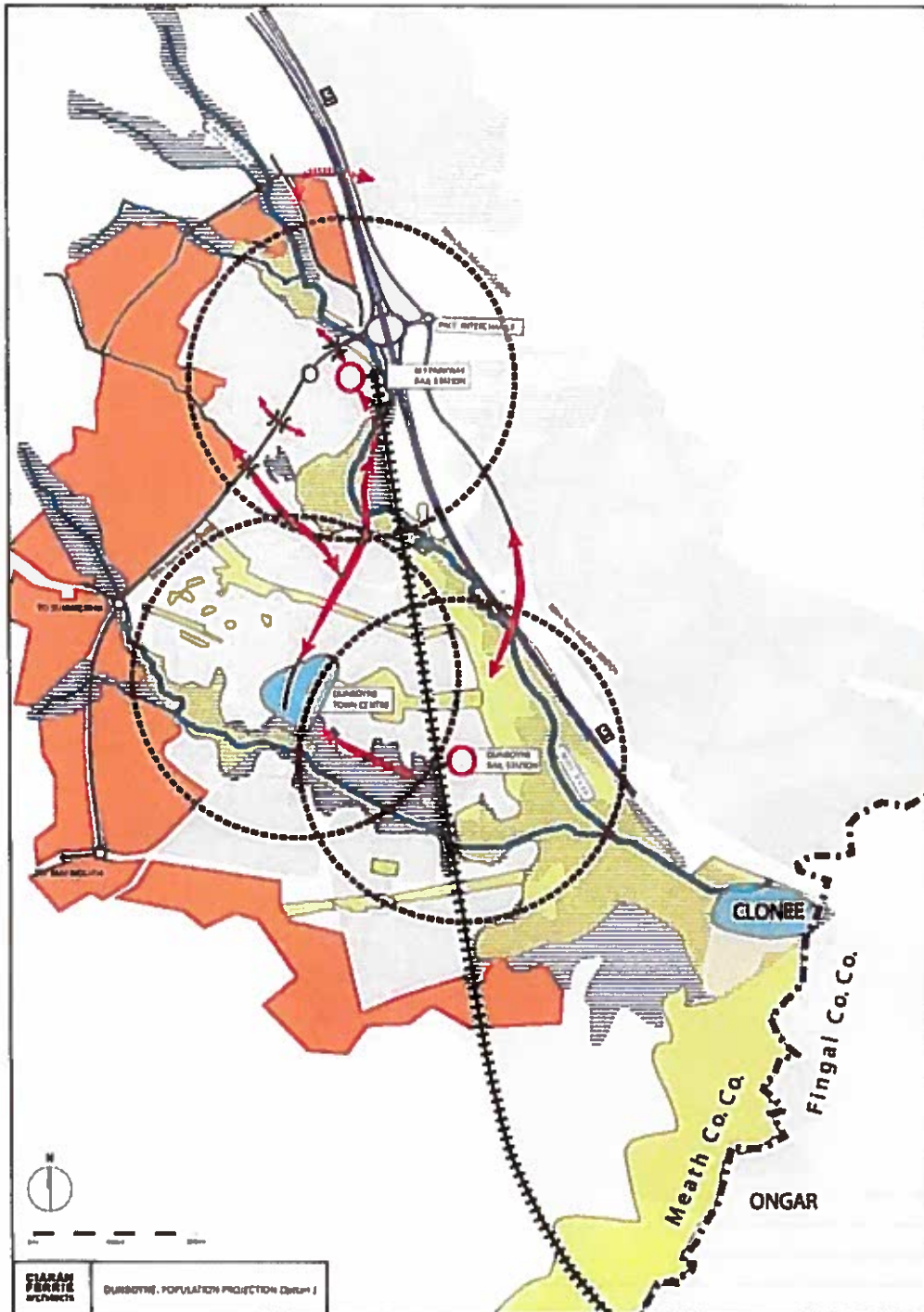
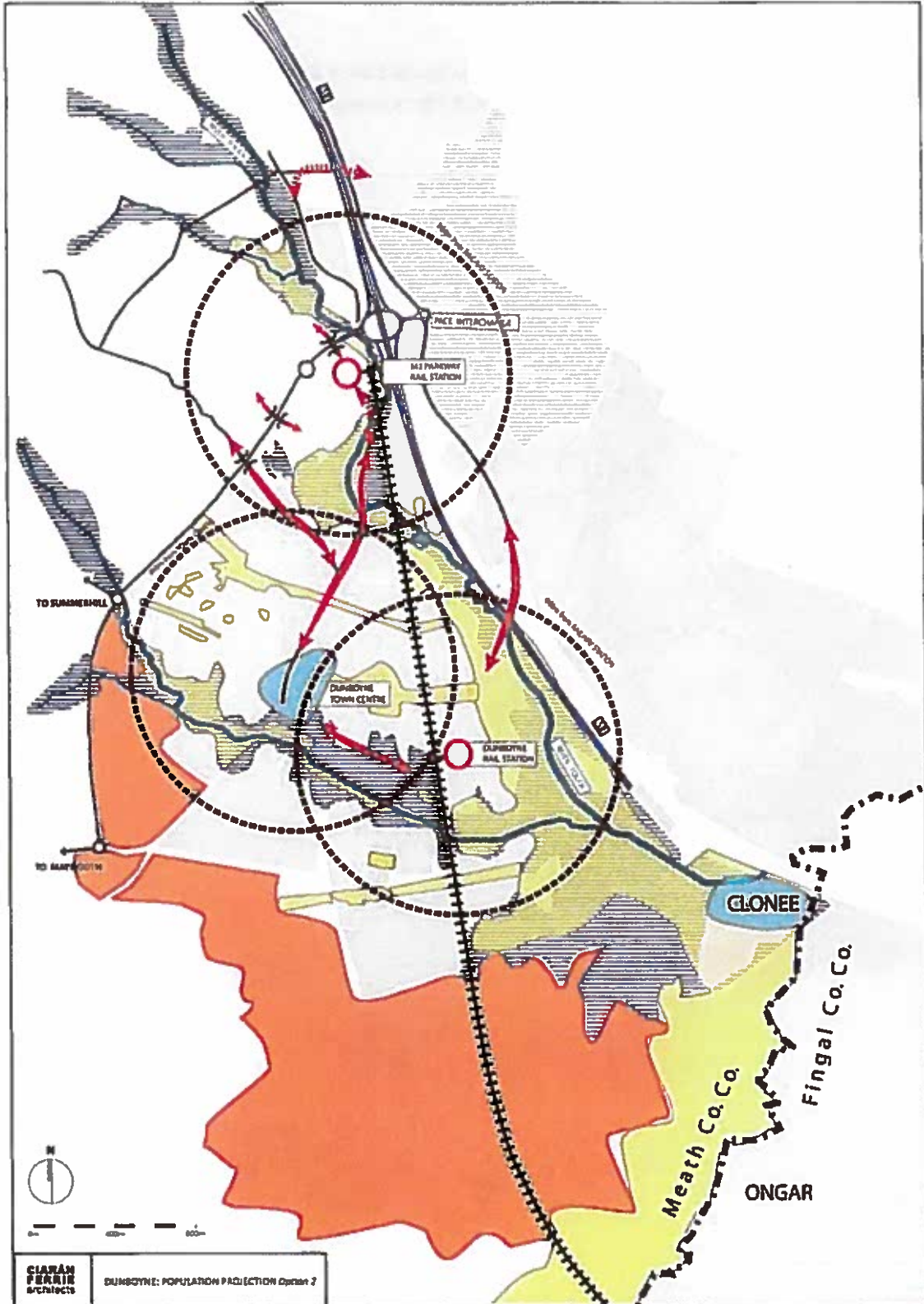


Figure 2.6: A 'no development' at North Dunboyne Scenario as appears to be advocated in the Draft Direction.



This analysis has identified North Dunboyne as a sustainable, infill, urban expansion area, centred on a multi-modal transportation node, and establishes an imperative that a sustainable mixed use development, consistent with that provided for in Variation 3, proceeds there in the short term if regional growth targets are to be achieved. In this regard, it is inevitable that significant urban expansion will happen at North Dunboyne. Variation 3 provides for the plan-led, integrated and connected, sustainable growth of the area in the short to medium term.

4. DRAFT DIRECTION – ANALYSIS OF STATEMENT OF REASONS

This Section summarises the relevant planning matters cited in the Draft Direction upon which it relies to support the proposed amendments to Variation No. 3, and provides a point by point analysis of those reasons.

4.1 Residential Zoning

The Draft Direction states that the residential zoning is considered to be inappropriate by reason of being 'Distant', 'Detached', and 'Disconnected' from the urban area and Social, Community and other Infrastructure. These assertions are addressed in turn below and must be considered in the context of:

- (i) the regional level objectives for the town which requires significant expansion of the built footprint, as addressed above, and
- (ii) the infill status of the site situated on a multi-modal interchange.

4.1.1 'Distant'

The Draft Direction refers to the residential zoning being '1.5-2 km away'. It does not state 'away' from what. Later in document it refers to 1.5 km from 'the established town'. This is factually incorrect.

The edge of the established town closest to the lands is clearly formed by the Dunboyne Industrial Estate which accommodates industrial and offices uses and the Dunboyne Institute of Further Education; and Kilbreena residential estate immediately south.

The edge of the identified development area boundary is approximately 110m from the subject lands. The established urban area is 280m from the lands as the crow flies. The proposed residential area is approximately 850m by road to the established urban area. The town centre, as defined by the town centre zoning objective, is 1.03 km from the zoned residential area as the crow flies, and 1.3km by road.

The lands enjoy a good level of connectivity to the established urban area, and present significant opportunities for enhancement. Connectivity is addressed in Figures 2.1 and 2.2 above, and section 4.2.3, below.

4.1.2 'Detached'

The Draft Direction states that the residential zoning '*significantly to the north of the established town at Pace (1.5-2 km away)*' would be a 'clear breach' of the sequential approach to zoning as set out in section

4.19 of the Development Plan Guidelines (2007). This analysis is wrong. The alleged breach of the sequential test is predicated on:

- (1) the clearly inaccurate characterisation of the lands as 1.5-2 km 'away' from the established town, as detailed in section 3.2.1 above;
- (2) a misrepresentation of the context of the site having regard to the established and emerging form of the settlement based on the rail corridor, as detailed in section 3.1; and,
- (3) an incomplete and inaccurate interpretation of the provisions of section 4.19 of the Guidelines. Section 4.19 of the Guidelines states:

'In order to maximise the utility of existing and future infrastructure provision and promote the achievement of sustainability, a logical sequential approach should be taken to the zoning of land for development:

(i) Zoning should extend outwards from the centre of an urban area, with undeveloped lands closest to the core and public transport routes being given preference (i.e. 'leapfrogging' to more remote areas should be avoided);

(ii) A strong emphasis should be placed on encouraging infill opportunities and better use of under-utilised lands; and

(iii) Areas to be zoned should be contiguous to existing zoned development lands. [Emphasis added]

A striking omission from the Draft Directive is the absence of any reference to the existence of a rail station at North Dunboyne. The only reference to the rail station is to the CEO's Report on the Variation which refers to 'rail based live/work communities'. The assessment of the site against the sequential test provisions above is materially and fundamentally changed when one considers the existence of the rail station. Furthermore, the Draft Direction omits any reference to the recent FDI investment of national significance which has occurred at North Dunboyne, which also materially affects that assessment.

In this regard, Variation 3 is fully compliant with the following criteria of the sequential test:

1.maximise the utility of existing and future infrastructure provision and promote the achievement of sustainability,....
2.public transport routes being given preference....
3.infill opportunities....

The Draft Direction also references section 2.3 and 6.2 of the Local Area Plan Guidelines (2013). Section 2.3 simply states the requirement to comply with the national guidelines and section 6.2 provides broad guidance on phasing and sequencing of development. Significantly, it states:

'Planning authorities should in general, and especially in locations benefiting from substantial investment in public transport, set some quantifiable targets for modal split in favour of public transport, walking and cycling. Such targets should be used to influence the phasing and sequential development with the local area plan. The trend in modal choices can be used to monitor the implementation of the local area plan.' [Emphasis added]

A relevant comparator for the application of the sequential test is Collinstown, Leixlip, County Kildare. Leixlip, like Dunboyne, is located in the Metropolitan Area of the GDA, is on a rail corridor, and is

designated under Regional policy to grow to a Level 2 centre over a period of 20 years. The relevance of the context and status of Collinstown to Variation 3, and the benefits enjoyed by North Dunboyne over Collinstown having regard to the sequential test criteria and the role of 'live/work developments in promoting economic development, are evident from Section 2.3 of the Collinstown LAP 2010:

...the development of Collinstown will help promote the attractiveness of North Kildare for further economic development by providing a range of high-quality lifestyle facilities to serve the cosmopolitan needs of the workforces of existing major employers in the area. It further states that a substantial area of land will remain at Collinstown to accommodate further inward investment projects, in addition to the town centre.

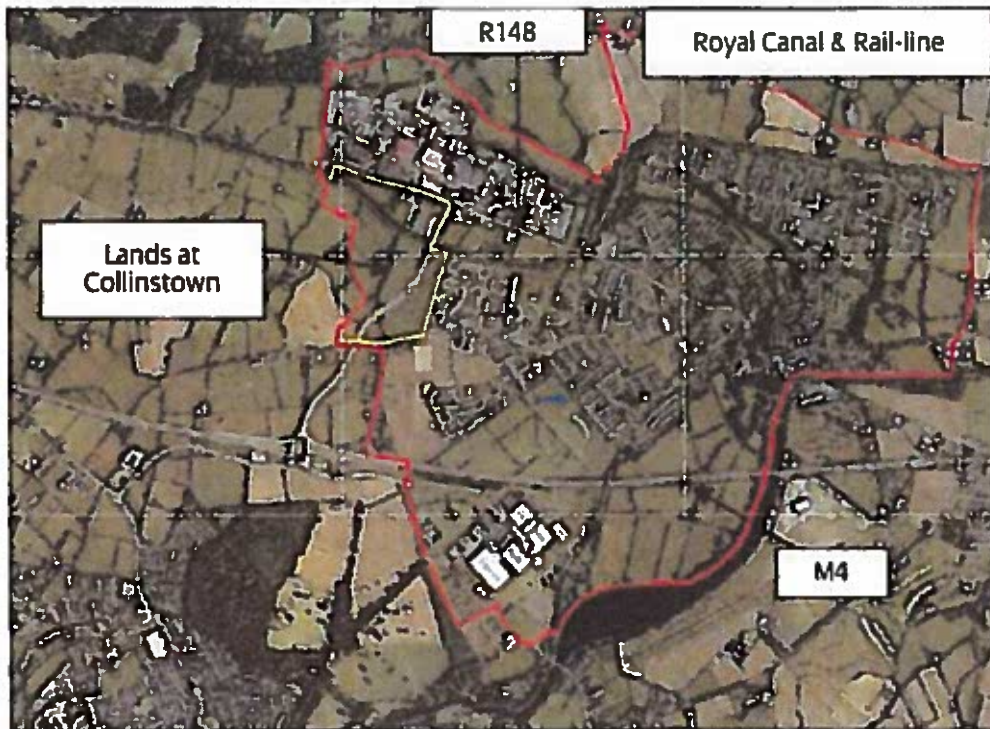
Key characteristics of the development at Collinstown are:

- Development of a centre attractive to leading national and multiple retailers to compete with other Metropolitan Major Town Centres such as Liffey Valley, Blanchardstown, Dundrum, etc.;*
- Provision of integrated leisure facilities such as multiplex cinema, bowling alley, theatre;*
- Redress of the deficit of existing shopping facilities in Leixlip;*
- Provision of a new railway station on the Maynooth – Connolly commuter rail line; [Note-North Dunboyne has an under-utilised rail station in situ.]*
- Provision of a Park-and-Ride facility; [Note-North Dunboyne has an under-utilised park and ride in situ.]*
- Potential to be served by a QBC corridor and local bus interchange; [Note-North Dunboyne has a local bus interchange in situ.]*
- To have excellent high capacity road connections to all four towns; [Note-North Dunboyne has an excellent high capacity road connections to surrounding towns.]*
- To be linked by dual carriageway to the Celbridge / Leixlip West junction of the M4 which has spare capacity; and [Note-is linked to the M3 junction – capacity is addressed elsewhere in this submission.]*
- To provide a context for the detailed design and development of the lands within a site Masterplan. [Note-Variation 3 provides for a Masterplanning approach.]*

Section 8.1 of the Collinstown LAP states that the 'land use zoning is to provide for major town centre facilities comprising an appropriate mix of employment, retail, recreational, civic, cultural and residential uses' and that the 'higher order retail provisions within this land use will be phased over approximately 20 years'. Section 8.2 states that new residential development will be influenced by site services, 'particularly proximity to public transport'.

Collinstown is located over 2 km from the established town centre of Leixlip and over 1 km from the closest existing rail station at Louisa Bridge. Applying the sequential test criteria and the principles of sustainable development applied at both Collinstown and North Dunboyne, North Dunboyne performs better than Collinstown, in particular benefitting from the existing rail station and park and ride.

Figure 4.1 Extract from the Collinstown Local Area Plan 2010.



[Note: The town centre is on the eastern bonday of the town with Collinstown on the western boundary]

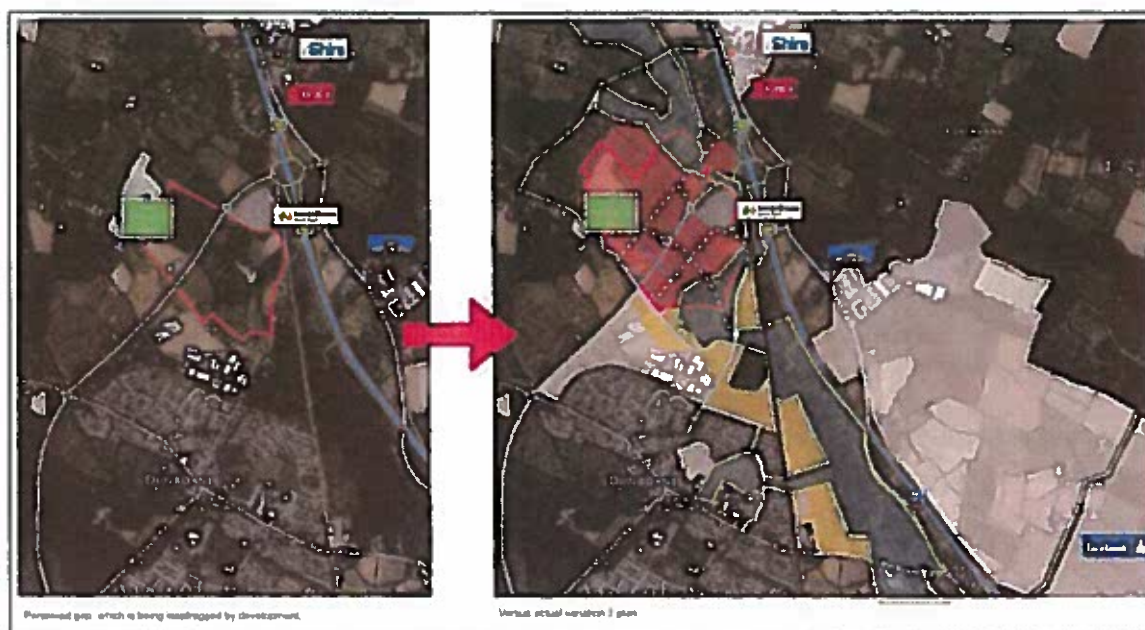
National policy prioritises the leveraging of existing investment in infrastructure and the utilisation of spare capacity. The State has made significant investment at the multi-modal interchange, with the rail based infrastructure in particular being significantly under-utilised.

The Infrastructure and Capital Investment Framework 2012-16 (November 2011) places a policy on enhancing the productivity of the existing road network and its contribution to economic growth. The opening paragraph of the Framework states: *'Within the context of tight fiscal constraints, the Government is committed to ensuring that the country's stock of infrastructure is capable of facilitating economic growth....*' The leveraging of existing infrastructure capacity and investment to facilitate economic recovery is clearly articulated on page 4 which states *'the potential of using existing assets and/or regulatory and administrative solutions must be exploited.*'

The policy approach advocated by the Draft Directive cannot be reconciled with national policy on leveraging on existing investment in infrastructure.

The Draft Direction also includes the term 'leapfrogging to more remote areas' in relation to the sequential test. The term leapfrogging implies that more suitable development areas between the urban core or public transport corridors are not zoned in favour of more remote areas. The analysis provided throughout this submission and in Figure 4.2 below clearly establishes that Variation 3 does not result in any leapfrogging and the lands are in fact more appropriately characterised as 'infill'. There are no other available lands between the existing urban area and the proposed development areas.

Figure 4.2 Sequential Urban Expansion



As such, the statement in the Draft Direction that Variation 3 would be a 'clear breach' of the sequential approach to zoning as set out in section 4.19 of the Development Plan Guidelines (2007) cannot be sustained.

4.1.3 'Disconnected'

The Draft Directive states that the Variation would be contrary to the core strategy for Dunboyne which directs new housing to the east and subsequently to the south of the town. This stated concern that the zoning proposed in Variation No. 3 would not be consistent with the core strategy completely overlooks the fact that the Variation is intended to alter that core strategy and therefore, by definition, will not be consistent with it.

As detailed above, Dunboyne is scheduled to grow from c7,000 to 25,000 by 2028/2034. In the period 2012-2014 c.1,000 of the 5,479 required in the County under the Core Strategy units were completed, resulting in a shortfall of c.4,700 units on the delivery of the core strategy to date. Commencement Notices for 13 no. dwellings have issued in Dunboyne since 2014 despite the town benefitting from Metropolitan Area growth town status and 2 no. rail stations. Variation 3 must be considered in this context.

The Draft Directive refers to lands east of the rail line adjacent to Dunboyne Rail station³. These lands are optimally located and satisfy the sequential test criteria. The lands are zoned Residential Phase 1 and have been zoned since 2001. These lands have not changed ownership since 2001 and no planning application

³ It is noted that the lands further to the east of those currently zoned around Dunboyne Rail Station are constrained by the Tolka Valley flood plain, and to 'leap frog' the flood plain would result in coalescence of Dunboyne with Clonee and ultimately the Blanchardstown urban area. This is contrary to County Development Plan policy to retain the identities of the two settlements and to prevent coalescence with the Blanchardstown area. As such, no development of scale can take place beyond the current zoned boundary to the east of the town.

has ever been made on the lands. The consequence of the approach being advocated in the Draft Direction has the potential to fossilise Dunboyne and preclude any further development until such time as these lands are released. This is contrary to national policy and recent legislative provisions which have attempted to address this phenomenon, including removal of compensation for dezoning and the vacant land levy. Given the history of the lands to the east of the rail line, to preclude any further development or zoning in Dunboyne pending the release of these lands is clearly contrary to national policy on *inter alia* planning, urban regeneration, economic development, public expenditure, etc.

Irrespective of the history of those lands, given the national housing crisis, and the extremely poor performance of Dunboyne and the County to date in meeting its regional level objectives, the approach of Variation 3 to provide for additional rail centred lands proceeding concurrently or ahead of lands at Dunboyne rail station, is an appropriate Active Land Management response, as advocated by the DoEHLG.

The same circumstances apply to lands to the south of Dunboyne referenced in the Draft Directive. Figures 2.1 and 2.2 identify the current and planned level of connectivity between the Variation lands and the Pace Rail Station and town centre. Both of these land banks are suitably and appropriately located to accommodate the plan-led expansion of the urban area.

Releasing lands at North Dunboyne is consistent with regional and County level objectives and the Core Strategy, and the proper planning and sustainable development of the area. The basis of the Draft Direction to remove the residential zoning objective cannot be sustained.

4.2 Employment Zoning

The Draft Direction states that the lands are in close proximity to Junction 5 on the M3 and the proposed development has the potential to generate traffic volumes which would limit the operation of the nearby national motorway interchange. The Spatial Planning and National Roads Guidelines SPNR Guidelines require that an evidence based approach is undertaken to avoid adverse impacts on national road infrastructure. The Draft Direction states that the Aecom Study is not complete and has not informed the proposed zonings and as such the Guidelines have not been followed

As noted above, a striking omission from the Draft Directive is the absence of any reference to the existence of a rail station at North Dunboyne. A comparable area of zoned employment land at North Dunboyne was included in the Dunboyne/Clonee/Pace LAP 2009-2015 and carried forward into the County Development Plan in Variation No. 2. The specific objective relating to the employment zoned land promotes the development of the lands within the lifetime of the current Development Plan. It is inconsistent for the Department to now issue a Draft Direction requiring that the Variation 3 employment zoning objective is replaced with the Variation 2 employment zoning objective, in circumstances where it did not issue a Draft Direction on the LAP in 2009 or Variation 2 adopted in 2014. There has been no change in circumstances since 2014 supporting this change in approach by the Department.

The Draft Direction also omits any reference to recent significant FDI investments by Facebook, Shires and Avoca in the area. Variation 3 zoned an additional 70 ha of employment lands accessed from Junction 4 on the M3, contiguous to the Facebook site (which is not the subject of the Draft Direction). The Spatial Planning and National Roads Guidelines (2012) facilitate junction upgrades when required by Plan-led development. The CEO's Report on Variation 2 addressing a submission by the then NRA in relation to M3 junctions acknowledged that *'the Spatial Planning and National Road Guidelines allow the upgrading of*

such junctions to facilitate appropriate development and will, if required, be pursued by this Authority in conjunction with the NRA and NTA:

The Spatial Planning and National Roads Guidelines set out the key steps in the 'evidence based' approach in Box 2.4:

Box 2.4 Key Steps for Building an Evidence-Based Approach

Step 1: Identifying and consulting with the key stakeholders in developing an integrated approach;
 Step 2: Confirmation of the national and/or higher level policy context for the development plan proposals;
 Step 3: Developing evidence based tools such as traffic models, including agreement between stakeholders in relation to acceptable data and assumptions;
 Step 4: Identification of demand management and mitigation measures to minimise the transport impact of the plan;
 Step 5: Identification of any infrastructural enhancements required and phasing;
 Step 6: Agreement between stakeholders on a delivery strategy including funding arrangements.

It is clear that an evidence based approach to development at the M3 Parkway has been followed by the Planning Authority prior to the Guidelines coming into effect in 2012. At the oral hearing for the rail line in 2007, the Planning Authority in its précis of evidence to the Oral Hearing on the Rail Order Council stated:

'Iamród Éireann acknowledges the potential identified by Meath County Council and developers for possible future retail and commercial developments at the Pace Park and Ride and that the current proposals (at the time of the hearing) should not limit or prevent future development plans.'

The précis of evidence also notes that:

'if expansion of the Park and Ride is required in the future, it may take the form of an adaption of the car park to a multi storey format. Meath County Council would also consider that the potential to develop over the Park and Ride for other commercial uses proximate to a public transport interchange might also be considered.'

The preparation of the LAP adopted in 2009 clearly followed an evidence based approach, stating at page 23:

'The requirement to prepare an IFPLUT arises from Strategic Settlement Objective SO2 in the County Development Plan 2007 -2013. The draft IFPLUT is currently being finalised in conjunction with the Dublin Transportation Office.

'The main aim of the IFPLUT is to consider the medium term development of the Corridor at the strategic level in the context of population growth to 25,000 persons and to recommend interventions with regard to planning, development and transportation policy where necessary. The IFPLUT is intended to inform the preparation of future Local Area Plans for the Corridor. The timeframe which the IFPLUT would consider was not defined in the County Plan but has emerged as 2009 - 2034; accordingly, it will provide strategic guidance for this Local Area Plan and the following three Local Area Plans.

The IFPLUT considers the spatial growth of the Corridor and the implications for residential, employment, retail and community lands as well as transportation and water related infrastructure in the context of the projected population growth to 25,000.' (Emphasis added)

Systra has undertaken a review of the strategic transportation assessment undertaken by Aecom and states as follows:

The transport assessment undertaken by AECOM and Meath County Council adopted an industry standard approach to conducting a Strategic Transport Assessment. The assumptions used in relation to trip generation, distribution and mode share are based on reliable existing data sources. Furthermore, the model development and assignment processes undertaken are in line with Transport Infrastructure Ireland (TII) Project Appraisal Guideline (PAG) recommendations. The work undertaken by AECOM on behalf of Meath County Council, therefore, provides a robust transport assessment of Variation 2 of the Meath County Development Plan 2013 -2019.'

A copy of the Systra Report is attached as Appendix 1.

The Draft Direction also infers an inappropriate distinction between the status of Junction 5 and Junctions 1-4 on the M3. In this regard, the following is noted:

- Junctions 1 - 5 are urban interchanges in the Metropolitan Area of the National Gateway City.
- Junction 3 has recently upgraded to facilitate enhanced access to Blanchardstown Town Centre (Level 2) and the surrounding area.
- The NRA has also approved enhancements to Junction 4. Variation 3 includes for an additional 70 ha of zoned employment lands contiguous to Facebook accessed primarily from Junction 4.
- Junction 5 is the only multi-modal interchange.

There is no basis for distinction between the interchanges serving the Blanchardstown urban area and Dunboyne and experience on those interchanges has been of upgrades being provided, responding to demand. The multi-modal status of Junction 5 provides significant opportunities for modal shift and minimising trip generation from the adjoining lands, consistent with national policy. In this regard, assessments carried out by Cronin Sutton Consulting Engineers establish that the lands at North Dunboyne adjoining the multi-modal interchange:

- Offer the greatest potential for modal transfer to public transportation
- Has significantly lower impacts on the Motorway network
- Presents the greatest opportunity for junction upgrades, when required, at lowest cost.
- Represents the optimum location at which to integrate land use and transportation.

Systra has also undertaken a review of the Cronin Sutton assessment and concludes as follows:

'Summary of Cronin & Sutton Junction Assessment Review

'The analysis of the M3 Junction at Pace, undertaken by Cronin & Sutton, contains a number of assumptions relating to trip generation and distribution which are based on first principles approaches using reliable data sources (e.g. TRICS, CSO Census 2011, Traffic Counts etc.). Whilst these assumptions are adequate for the assessment undertaken it is recommended that a more comprehensive approach is taken for future assessments, in line with that which is described below in Section Five of this note.

'The estimated future year trip levels have been assessed using ARCADY to evaluate the performance of the M3 Pace roundabout with the proposed development Framework Plan in place. This assessment concluded that, with the introduction of a number of mitigation measures, the Pace Roundabout will operate within capacity in the future year of 2025 with the proposed development levels. However, further work, in the form of a full traffic and transport assessment, is required to fully establish the

impacts of the proposed development on the surrounding road network at a local and strategic level for all modes of transport.

The Systra Report concludes:

'In conclusion, following a review of the two transport assessments undertaken to date (i.e. the M3 Pace Junction Assessment by Cronin and Sutton and the AECOM Strategic Transport Assessment), it is considered that they provide a robust preliminary estimation of the likely traffic impacts resulting from the development of the zoned lands at Pace thereby providing a reasonable starting point for future transport assessments for the area.

'When progressing to detailed planning stage it is recommended that further detailed work is undertaken to understand the multi-modal transport requirements, traffic impacts and any mitigation measures which may be necessary as a result of the proposed development in the area. It is recommended that this additional work includes use of the NTA's East Regional Model in combination with TII's National Road Model. This should be accompanied by the development of a Mobility Management Plan and a Sustainable Access Movement Strategy for the area. The scoping of this additional assessment should be agreed with the relevant authorities including Meath County Council, TII and NTA.

It is clear that the IFPLUT and the Aecom Strategic Transportation Assessment undertaken on behalf of the Planning Authority provide comprehensive long term land use and transportation planning assessment tools which allow for modelling to be reviewed and updated as growth milestones are achieved and significant developments proceed.

Experience of the plan making process and large scale developments proximate to national road junctions is that Steps 1-3 are typically followed at the plan making stage, establishing at a high level that the relevant junction will continue to provide an acceptable level of service. Steps 4-6 are typically followed as part of the Development Management process in pre-application consultation and through the planning application process. The evidence based approach followed by the Planning Authority is consistent with common practice and it is unreasonable for the Draft Direction to distinguish Variation 3 from the common approach to the evidence based plan making.

Finally, the State has made significant investment at the Multi-modal interchange, which is hugely under-utilised. The policy approach advocated by the Draft Directive cannot be reconciled with national policy on leveraging on existing investment in infrastructure and the synchronisation of land use and transportation.

The Draft Directive is grounded in a roads focused approach to spatial planning which does not adequately acknowledge the regional policy status of Dunboyne, serviced by a multi-modal transportation interchange (rail/motorway/national/regional roads), and located in the Metropolitan Area. National and regional policy advocates that growth is channelled to and consolidated at such locations. The evidence based approach in the 2012 Guidelines has been followed in a manner consistent with common practice and as such the stated position in the Draft Guidelines cannot be sustained.

4.3 Regional Retail Development

The Draft Direction notes that the Regional Retail Strategy designates Dunboyne as a Level 3 centre with a footnote to grow to Level 2 over 20 years (2008-2028). The Dunboyne/Pace/Clonee LAP 2009-2015 identified North Dunboyne as the preferred location for new level 2 centre at Pace. The Draft Direction

states that the regional retail designation has been separated into isolated residential and employment zonings

Significantly, the document states that the imminent Regional Strategy Review could potentially review the long term Level 2 designation in light of no development having taken place to date and its viability given proximity to Blanchardstown.

It states that the CEO's Report states that the zonings equate to rail-based live work communities comparable to Clonburris, Adamstown and Cherrywood. The Draft Direction states that these fundamentally different to small scale residential zoning 1.5 km from the 'established town'.

These matters are addressed in turn below.

4.3.1 Regional Retail Designation

The Draft Direction requires the current zoning and related objectives for a Level 2 Centre (retail, residential, commercial, community and supporting uses), and employment uses, are reinstated, and then infers that these objectives may in turn be removed following the review of the current Regional Planning Guidelines. The procedures for making and reviewing the Guidelines are set out in Chapter III of the Planning and Development Act, 2000, as amended. It is inappropriate for the Department to be pre-empting, prejudging or attempting to influence the outcome of the Review process under a Draft Direction. It is noted that the preparation of the Regional Spatial and Economic Strategy is a function of the Eastern and Midland Regional Assembly and not of the Minister.

The effect of the inference around the Level 2 zoning is to sterilise the lands pending the completion of the review of the Regional Strategy, and to attach a level of uncertainty to the lands thereafter which would be highly prejudicial. Given the level of state investment in under-utilised public transportation infrastructure at Pace, this is contrary to national policy and the principles of proper planning and sustainable development.

The Draft Direction is not only attacking the current zoning objectives but is launching a collateral attack on the RPPGs adopted in 2008. Significantly, these same objectives were included in the LAP 2009 and Variation 2. The Department did not issue a Draft Direction in respect of those plans and it is acting inconsistently to launch a collateral attack on those designations now.

In those circumstances, reverting to the Variation 2 zoning and objectives does not represent a coherent overall strategy, particularly in circumstances where the Draft Direction expressly questions the viability of the zoning objectives and inferred that they may be rendered obsolete following the review of the regional guidelines. Section 31(4)(b) requires the Draft Direction to set out '*an overall strategy for the proper planning and sustainable development of the area*'. The Act places an obligation on the Minister to advance zonings and related objectives, or otherwise, which the Minister considered to represent a coherent strategy. By reverting to zoning and objectives which the Direction has undermined, the Variation as amended by the Draft Direction cannot be said to set out a strategy for the proper planning and sustainable development of the area and as such the Draft Direction has failed to meet the requirements of the Act.

The Draft Direction sets out detailed reasons as to why the Minister considers that the Variation doesn't comply with the requirements of the Act. However, it doesn't set out a plan that that the Minister considers

to be compliant or the basis on which that plan complies with the proper planning and sustainable development of the area having regard to those sections of the Act, Guidelines and planning considerations cited in relation to Variation 3. That information was required to be set out in the Draft Direction and on that basis the Direction is defective and does not meet the requirements of section 31 of the Act.

4.3.2 Zoning Objectives

The assertion in the Draft Direction that the retail designation has been separated out into residential and employment objectives must be considered in the context of the current statutory policy framework. The designation of Dunboyne as a Level 2 centre in the RPPGs and MCDP relates to Dunboyne, not Pace. The LAP which incorporated the draft IFPLUTS identified North Dunboyne as the emerging preferred location for a Level 2 centre. It provided a zoning objective identifying that location and associated objectives. The remainder of the lands were zoned for employment uses. The LAP has now lapsed. The relevant statutory Plan is the MCDP 2013-2019, as varied. Variation 3 remains consistent with the Retail RPPGs as it has not changed the status of Dunboyne as a Level 3 growing to a Level 2 centre. The only change in this regard is that North Dunboyne is no longer the preferred location for the expansion of retail floorspace to grow to Level 2 status.

The Economic Development Strategy which informed the basis of Variation 3, provides a sound evidence base for the zoning and related objectives in Variation 3.

4.3.3 Rail Based Live-Work Communities

The Draft Direction states that the CEO's Report states that the zonings equate to rail-based live work communities comparable to Clonburris, Adamstown and Cherrywood. The Draft Direction states the Department considers that these large developments of '8,000+ homes' are fundamentally different to small scale residential zoning 1.5 km from the 'established town' and adjoining an interchange. The Draft Direction does not provide any indication other than scale as to how those plan-led developments differ from Variation 3. The Draft Direction does not refer to any national Guidelines or any other international guidance that refers to thresholds for rail based live-work communities. Dunboyne currently has a resident population of 7,000, planned to grow to 25,000, which will be larger than Adamstown or Cherrywood. Neither Clonburris nor Adamstown include a 'work' element other than supporting retail.

Current international best practice in place making is centred on the mixed use 'live-work' model where employment, home and recreational uses are closely grouped, minimising the need for travel and enhancing quality of life. FDI investment is particularly sensitive to availability of housing and quality of life issues relating to proximity to high quality recreational and cultural assets, and quality of environment. Recent experience in Ireland has been to retrofit residential and quality of life infrastructure into rail based employment centres such as Sandyford and City West. Variation 3 has adopted a pro-active approach to plan led mixed use development, providing for employment, residential, neighbourhood services, and educational uses grouped at a rail based interchange. This plan-led approach is consistent with current best international practice.

In conclusion, the statements in the Draft Direction relating to regional retail objectives are not supported by analysis and are inappropriately pre-empting the outcome of a democratic process in the review of the

RPGs and inappropriately launching a collateral attack on designations in respect of which no Draft Direction issued on 2 previous plans.

5. FLOODING GUIDELINES

Flood management has not been cited in the Draft Direction. Notwithstanding, for the purposes of providing a thorough analysis of the suitability of the lands for development as provided for under Variation 3, RPS Consulting Engineers has addressed the issue of connectivity of the zoned lands to the rail station and the town centre in the context of the most up to date flood mapping available. The RPS assessment, included as Appendix 2, states:

'RPS has been appointed to undertake a detailed Flood Risk Assessment for the purposes of the Masterplan required under Variation 3 and subsequent planning applications. This study will ascertain the level of flood risk to the existing road connections adjacent to the development lands. This information will then be used to ensure that the detail plan stage is co-ordinated with the results from the Flood Risk Assessment

The lands have a number of connection points to the existing town, including the Distributor Road and the Kennedy Road connection. According to the results of the Tolka Flooding Study (2003), the Kennedy Road is not impacted by the 1% Annual Exceedance Probability (AEP) floodplain. The flood mapping for the Tolka Flooding Study shows lands that were used to construct the distributor road as flooding.

'However this road was constructed since the study was completed on a large embankment in the areas that are shown as being at risk of flooding. It would therefore be expected that this road is not impacted by the 1% AEP floodplain. This will be assessed further during the detailed Flood Risk Assessment and reported on as part of this study.

'We are satisfied that the connectivity of the zoned development lands to the Rail Station and the Town Centre can be planned at detail scheme stage, to ensure that it will not be impacted by the 1% AEP flood event.

6. CONCLUSION

Striking omissions from the Draft Directive are the absence of any reference to the existence of a rail station at North Dunboyne, national policy which prioritises leveraging on existing investment in infrastructure, and the level of recent FDI and indigenous investment of national and international significance in the area which materially affects the basis of any assessment. These facts are central and material to the assessment of the suitability of the lands at North Dunboyne for the nature and scale of development proposed in Variation 3.

The RPGs for the GDA position Dunboyne to capitalise on the dynamics which have driven massive levels of inward investment in economic development, employment creation, commercial and retail development, community building and infrastructure on the Fingal side of the county boundary and more recently on the Meath side. The north Dunboyne area has recently benefitted from major inward investment of

international significance from Facebook, Shire and Avoca, and is now providing a national level focus for Foreign Direct Investment (FDI). These announcements will in turn create a dynamic for further FDI and domestic investment and create a demand for high quality and highly integrated residential and work communities and supporting infrastructure.

For Dunboyne to fulfil its Regional level objectives by 2028, being the period of the current and next County Development Plans, a population increase of in the order of 18,000 must be accommodated, requiring approximately 6,700 additional residential units. This level of population growth must be accompanied by significant additional employment generating floorspace, and supporting services, community, educational, recreational etc. infrastructure. In the period 2012-2014 c.1,000 of the 5,479 units required at the County level were completed, resulting in a shortfall of c.4,700 units on the delivery of the core strategy to date. Commencement Notices for 13 no. dwellings have issued in Dunboyne since 2014 despite the town benefitting from Metropolitan Area growth town status and 2 no. rail stations.

In the context of the national housing crisis, significant inward FDI in the area and its requirement for housing availability and a high quality of life, and consistent with the Department's advices to Planning Authorities on Active Land Management, the Planning Authority has prepared an Economic Strategy which has built upon the foundations laid by the County Development Plan and Variations 1 and 2, and now underpins Variation 3

The high level analysis of opportunities and constraints for growth in the Dunboyne area, and sustainable expansion options having regard to the level of growth targeted under the town's regional level objectives has confirmed the approach of Variation 3 that North Dunboyne is a sustainable, infill, urban expansion area, centred on a multi-modal transportation node; that it represents the optimum location for mixed use urban expansion required under regional policy; and that it is inevitable and imperative that significant urban expansion occurs at North Dunboyne consistent with the sustainable development principles provided for in Variation 3, namely the plan-led, integrated, connected, sustainable expansion of the settlement. Releasing lands at North Dunboyne has been demonstrated to be consistent with regional and County level objectives and the Core Strategy, and the proper planning and sustainable development of the area

An assessment of the relevant planning matters cited in the Draft Direction upon which it relies to underpin the proposed amendments to Variation 3 concludes that the facts on which the Draft Direction relies are incorrect or inaccurate, or rely on an interpretation of policy and fact which are not sufficient or sustainable having regard to both the wider strategic and site specific contexts

The Draft Directive references to the Spatial Planning and National Roads Guidelines (2012) is grounded in a roads focused approach to spatial planning which does not adequately acknowledge the regional policy status of Dunboyne and omits any reference to the existence of the rail station. National and regional policy advocates that growth is channelled to and consolidated at such locations. The evidence based approach in the 2012 Guidelines has been followed in a manner consistent with common practice and as such the stated position in the Draft Guidelines cannot be sustained.

Furthermore, there is no basis for distinction between the interchanges serving the Blanchardstown urban area and Dunboyne and experience on those interchanges has been of upgrades being provided, responding to demand. The multi-modal status of Junction 5 provides significant opportunities for modal shift and minimising trip generation from the adjoining lands, consistent with national policy. In this regard,

assessments carried out by Cronin Sutton establish that the lands at North Dunboyne adjoining the multi-modal interchange:

- Offer the greatest potential for modal transfer to public transportation
- Has significantly lower impacts on the Motorway network
- Presents the greatest opportunity for junction upgrades, when required, at lowest cost.
- Represents the optimum location at which to integrate land use and transportation.

Finally, the State has made significant investment at the Multi-modal interchange, which is hugely under-utilised. The policy approach advocated by the Draft Directive cannot be reconciled with national policy on leveraging on existing investment in infrastructure and the synchronisation of land use and transportation.

The effect of the inference around the Level 2 zoning is to sterilise the lands pending the completion of the review of the Regional Strategy, and to attach a level of uncertainty to the lands thereafter which is highly prejudicial and inappropriate. The statements in the Draft Direction relating to regional retail objectives are not supported by analysis and are inappropriately pre-empting the outcome of a democratic process in the review of the RPGs and inappropriately launching a collateral attack on designations in respect of which no Draft Direction issued on 2 previous plans. The Draft Direction is not only attacking the current zoning objectives but is launching a collateral attack on the RRPGs adopted in 2008 and subsequent plans made consistent with the RRPGs. The Department did not issue a Draft Direction in respect of those plans and it is acting inconsistently to launch a collateral attack on those designations now.

RPS has confirmed that identified flood zones do not impact on connectivity or accessibility within the lands or between the lands and the rail station and the established urban area.

It is inevitable that significant urban expansion will occur at North Dunboyne. It is appropriate and consistent with all relevant principles of proper planning and sustainable development that such plan-led expansion is accommodated. Variation 3 facilitates that process. The effect of the Draft Direction, and its inference in respect of the status of the Level 2 Centre objectives, is to preclude plan-led development occurring indefinitely and to contravene the requirement of section 31(4) of the Act that the Directive puts in place a coherent strategy for the proper planning and sustainable development of the area, to the detriment of the GDA Metropolitan Area, the county, the town, its hinterland and its resident population, and the achievement of national and regional development objectives.

Appendix 1

Systra Transportation Engineers

Review of Transportation Assessments

Appendix 2

RPS Consulting Engineers

Review of Flood Risk Assessment and Connectivity

DEVELOPMENT FRAMEWORK PLAN AT PACE, DUNBOYNE, COUNTY MEATH

REVIEW OF TRANSPORT ASSESSMENTS

IDENTIFICATION TABLE	
Client/Project owner	McGarrell Reilly Group
Project	Development Framework Plan at Pace, Dunboyne, County Meath
Title of Document	Review of Transport Assessments
Type of Document	Info Note
Date	13/07/2016
Reference number	30029912
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1. INTRODUCTION

1.1 Overview

1.1.1 SYSTRA Ltd were commissioned by McGarrell Reilly Group to undertake a review of the transport appraisal work undertaken to date for the proposed site development framework plan at Pace, Dunboyne, County Meath. SYSTRA were also requested to provide guidance on the future transport planning and modelling requirements to allow for a comprehensive transport assessment of the area.

1.1.2 The transport appraisal undertaken to date includes an assessment of the M3 pace junction by Cronin Sutton Consulting on behalf of McGarrell Reilly Group and a strategic transport assessment of future land use proposals for Dunboyne by AECOM on behalf of Meath County Council.

1.1.3 This review of the above transport assessments focusses on the following:

- Key assumptions made (levels of development, trip generation, trip distribution, etc.);**
- Findings and recommendations made; and**
- Recommendations for future transport assessment work.**



2. STRATEGIC TRANSPORT ASSESSMENT UNDERTAKEN BY AECOM

2.1 Overview

2.1.1 AECOM were commissioned by Meath County Council to conduct a Strategic Transport Assessment of the zoned lands at Pace. This work was carried out as part of a Land Use and Transport study in 2009 and then updated in response to a variation (called Variation 2) of the Meath County Development plan in 2014. The work carried out can be summarised as follows:

- An Integrated Framework for Planning Land-Use and Transportation (IFLPUT) for the Dunboyne / Clonee / Pace corridor was developed in 2009. The IFLPUT Plan proposed that, for Phase 1, future growth would be focused initially on Dunboyne. During Phase 1, it was proposed that a Strategic Development Zone (SDZ) application would be prepared by Meath County Council to guide the build out of Pace, setting out a phased, sequential approach to the development of Pace as a new settlement, centred on Pace rail station. It was considered that Phase 2 of the IFLPUT plan would then be centred on the build out of Pace in accordance with the SDZ, thereby delivering the preferred land use scenario. Some of the technical work from this study was incorporated into the development of Meath's Dunboyne, Clonee and Pace Local Area Plan, 2009 – 2015.
- Meath County Council then developed revised future land-use proposals for the area in 2013/2014 (Variation 2 of Meath County Development Plan). This took cognisance of the changes in the local and national economic climate and the aims outlined in Meath's County Development Plan 2013 – 2019 (January 2013). AECOM undertook a high level transport assessment of the land use proposals and ascertained that, with some investment in Public Transport and the National and Local road network, the proposed quantum of development could be catered for in the area.

2.2 Review of Strategic Transport Assessment Approach and Key Assumptions

2.2.1 *Trip Generation / Land Use Assumptions:*

- The Strategic Transport Assessment for Variation 2 of the Meath County Development Plan contained a number of specific land use development assumptions for Dunboyne and the surrounding areas.
- These development levels were then converted car trips using established trip generation Rates.

2.2.2 *Trip Distribution:*

- The trip distribution for new development traffic has been taken from the existing distributions of nearby developments in Dunboyne and the surrounding area.

2.2.3 *Modal Split:*

- The modal split for development traffic is based on a detailed analysis of existing Census data for the area and assumed a similar modal split for the future year tests.

2.2.4 *Forecasting (Future Year Background Traffic Growth):*

- Relevant future year traffic growth rates have been derived from the future year (2030 & 2050) TII National Transport Models (NTM).

2.2.5 *Modelling / Assignment:*

- The transport modelling of the forecast trip levels has been undertaken using a Local Area Model (LAM) which was developed using SATURN Highway simulation software and is based on a cordoned model taken from the Transport Infrastructure Ireland (TII) NTM base model. This cordoned model was refined with additional detail added where necessary to ensure the physical characteristics of the road network were reflective of the existing network in the area at the time of model development.

2.2.6 *Proposed Mitigation:*

- The high level assessment carried out by AECOM and Meath County Council concluded that this quantum of development could be accommodated if it was accompanied by certain improvements to public transport and the national and local road network. Some of the key improvements recommended were:
 - Upgrades to the Clonee Interchange;
 - Upgrades to the Pace Interchange; and
 - Local Road Schemes – e.g. Internal Roads and new access arrangements, a Dunboyne Eastern Bypass, among others.

Summary of AECOM Strategic Transport Assessment Review

The transport assessment undertaken by AECOM and Meath County Council adopted an industry standard approach to conducting a Strategic Transport Assessment. The assumptions used in relation to trip generation, distribution and mode share are based on reliable existing data sources. Furthermore, the model development and assignment processes undertaken are in line with Transport Infrastructure Ireland (TII) Project Appraisal Guideline (PAG) recommendations. The work undertaken by AECOM on behalf of Meath County Council, therefore, provides a robust transport assessment of Variation 2 of the Meath County Development Plan 2013 -2019.



3. M3 PACE JUNCTION ASSESSMENT UNDERTAKEN BY CRONIN & SUTTON

3.1 Overview

3.1.1 Cronin & Sutton Consulting Engineers were commissioned by McGarrell Reilly Group to prepare a junction capacity assessment report for the proposed site development framework plan at Pace, Dunboyne, Co. Meath. The objective of this assessment was to determine the existing and future capacity of the M3 Pace Roundabout and to determine the mitigation measures required for the Framework Plan to be accommodated.

3.2 Review of Strategic Transport Assessment Approach and Key Assumptions

3.2.1 *Trip Generation / Land Use Assumptions:*

- The proposed Framework Plan for the lands at Pace, assumed in the Cronin & Sutton Assessment, includes the following land uses:
 - Residential;
 - Science and Technology;
 - Retail Warehouse; and
 - Retail Centre.
- The trip generation rates for the assessment have been based on data extracted from the TRICS (Trip Rate Information Computer System) database for similar land uses and locations to those of the proposed development site.

3.2.2 *Trip Distribution:*

- It has been assumed that 80% of all development traffic will use the M3 Pace Roundabout to origins and destinations in the north, south and east.

3.2.3 *Modal split*

- A car mode share of 50% has been used in this assessment. This mode share is based on an analysis of Census 2011 data which found that 63% of all trips to work, school or college in Co. Meath use private car. A lower car mode share was applied to this site based on its close proximity to Pace Railway Station (less than 200M) and a number of relatively high frequency bus services.

3.2.4 *Forecasting (Future Year Background Traffic Growth):*

- Future year background traffic levels have been calculated using NRA 2002-2040 Traffic Forecasts for Non-national roads. In the interests of robustness, forecast traffic figures for the P&R site at Pace taken from a 2008 study by Waterman and Boreham have also been added to the future year background traffic growth figures.

3.2.5 *Modelling / Assignment:*

- The trips calculated using the trip generation and distribution assumptions outlined above have been used in a capacity assessment of the Existing M3 Pace junction for

the PM peak period (busiest peak period) using ARCADY. ARCADY is an industry standard piece of software used to predict capacities, queues, delays and accident risk on roundabouts.

3.2.6 *Recommended Mitigation:*

- A number of recommended mitigation measures have been assessed using ARCADY Software. The measures assessed include:
 - The addition of a number of slip lanes so that traffic can avoid the Pace Roundabout;
 - The additional of a dedicated merge-ramp, joining the R157 to the M3 Southbound; and
 - Full signalisation of M3 Pace Roundabout.

3.2.7 The analysis found that the inclusion of some or all the proposed mitigation measures will lead to improved performance of the junction and allow the junction to operate within capacity for the tested year (2025) and time periods (PM Peak).

Summary of Cronin & Sutton Junction Assessment Review

The analysis of the M3 Junction at Pace, undertaken by Cronin & Sutton, contains a number of assumptions relating to trip generation and distribution which are based on first principles approaches using reliable data sources (e.g. TRICS, CSO Census 2011, Traffic Counts etc.). Whilst these assumptions are adequate for the assessment undertaken it is recommended that a more comprehensive approach is taken for future assessments, in line with that which is described below in Section Five of this note.

The estimated future year trip levels have been assessed using ARCADY to evaluate the performance of the M3 Pace roundabout with the proposed development Framework Plan in place. This assessment concluded that, with the introduction of a number of mitigation measures, the Pace Roundabout will operate within capacity in the future year of 2025 with the proposed development levels. However, further work, in the form of a full traffic and transport assessment, is required at detailed plan stage to fully establish the impacts of the proposed development on the surrounding road network at a local and strategic level for all modes of transport.



4. RECOMMENDED NEXT STEPS

4.1 Introduction

4.1.1 To ensure that the development of the zoned lands at Dunboyne takes place in a sustainable manner and in accordance with planning guidelines it will be necessary to demonstrate that the development will be well integrated with the existing services and community in Dunboyne, encourages sustainable travel and has a minimal impact on the surrounding road network. To build on the work undertaken to date, and in advance of the development of the zoned lands at detailed planned stage, it is recommended that the following tasks be completed:

- A strategic, multi-modal, transport modelling assessment;
- Microsimulation modelling;
- Development of a Mobility Management Plan; and
- Preparation of a Traffic and Transport Assessment Report.

4.2 Strategic Multi-Modal Transport Modelling Assessment

4.2.1 *Use of the East Regional Model (ERM):*

- The National Transport Authority's recently completed ERM is an all-day transport modal including all of the main surface modes of travel. The ERM is the ideal tool for assessing the potential number of trips to the future development by private car, bus, rail, walking and cycling. It is recommended that the zoned lands at Dunboyne, using a number of phased development strategies, should be assessed using the ERM for an Opening Year and Horizon Year.
- These model tests should also include other proposed land use and transport proposals in Dunboyne and the wider greater Dublin Area and include the following steps:
 - Meet with the NTA modelling team to explain the scope of our study and formally request use of the ERM for testing the development.
 - Set out the phases to be tested for the development and the phasing of the planned network infrastructure (walking, cycling, PT and roads).
 - Set up test strategies in ERM which could include (to be agreed during inception):
 - Base Year Model;
 - Opening year - Without Development and with planned network improvements;
 - Opening year - With Development and with planned network improvements;
 - Horizon year - Without Development and with planned network improvements; and
 - Horizon year - With Development and with planned network improvements.

4.2.2 It is important to ensure that cumulative impacts are taken into account and therefore the test strategies will need to include other proposed land uses in Dunboyne (e.g.

Pharmaceutical plant). The strategies will also include other proposed transport measures in the town as well as proposals contained in the wider Greater Dublin Area 2016-2035.

4.2.3 As part of the modelling analysis, an assessment framework for reviewing the performance of the proposed developments should be created. An example of some of indicators to be included in this framework are:

- % of trips carried out by sustainable modes;
- % increase in traffic on the M3 during peak traffic periods; and
- Number of key junctions at, or close to, capacity etc.

4.2.4 By assessing the model results in such a way, in cases where the strategies fall short of the agreed KPI's, additional mitigation measures may be developed which could include improvements to the transport network or further recommendations to be contained in the Mobility Management Plan (See below).

4.2.5 *Use of TII's National Transport Model:*

- Given the proximity of the development to the M3 interchange at Dunboyne, it is recommended that a parallel strategic modelling exercise be undertaken to review traffic flows on the M3 with and without the development. It is advised that this exercise be performed by AECOM who are currently on the TII transport planning framework.

4.2.6 *Use of Microsimulation Modelling:*

- Following completion of the strategic modelling exercises detailed above, it is recommended that a micro-simulation modelling exercise be undertaken for the main access routes for the development as well as the M3 interchange at Pace. This exercise will assess the operational performance of the interchange in the context of the proposed developments and will help identify the need for any additional mitigation measures.

4.2.7 *Develop Mobility Management Plan:*

- Finally, a mobility management plan should be developed for the proposed developments. The central aim of a MMP is to devise a package of sustainable transport measures to reduce the demand for car travel and increase the attractiveness of alternative modes. Effective MMP's can bring about tangible benefits for the entire community, as well as reducing pressure on the transport network. A MMP will be an essential component of the overall masterplan.

4.2.8 *Traffic and Transport Assessment Report*

- Once all of the above tasks have been completed it is recommended that a standalone Transport Assessment Report is prepared detailing the outcome of all of the analysis undertaken.



5. CONCLUSION

- 5.1.1** In conclusion, following a review of the two transport assessments undertaken to date (i.e the M3 Pace Junction Assessment by Cronin and Sutton and the AECOM Strategic Transport Assessment), it is considered that they provide a robust preliminary estimation of the likely traffic impacts resulting from the development of the zoned lands at Pace thereby providing a reasonable starting point for future transport assessments for the area.
- 5.1.2** When progressing to detailed planning stage it is recommended that further detailed work is undertaken to understand the multi-modal transport requirements, traffic impacts and any mitigation measures which may be necessary as a result of the proposed development in the area. It is recommended that this additional work includes use of the NTA's East Regional Model in combination with TII's National Road Model. This should be accompanied by the development of a Mobility Management Plan and a Sustainable Access Movement Strategy for the area. The scoping of this additional assessment should be agreed with the relevant authorities including Meath County Council, TII and NTA.



APPROVAL

Version	Name		Position	Date	Modifications
1	Author	David Conlon	Principal Consultant	13/07/2016	
	Checked by	Ian Byrne	Director	13/07/2016	
	Approved by	Ian Byrne	Director	13/07/2016	
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13th July 2016

Our Ref: MDW0758L0002

Re: **Dunboyne - Flood Risk Assessment - Clarification**

Dear Mr Walsh,

RPS has been appointed to undertake a detailed Flood Risk Assessment for the purposes of the Masterplan required under Variation 3 and subsequent planning applications. This study will ascertain the level of flood risk to the existing road connections adjacent to the development lands. This information will then be used to ensure that the detail plan stage is co-ordinated with the results from the Flood Risk Assessment.

The lands have a number of connection points to the existing town, including the Distributor Road and the Kennedy Road connection. According to the results of the Tolka Flooding Study (2003), the Kennedy Road is not impacted by the 1% Annual Exceedance Probability (AEP) floodplain. The flood mapping for the Tolka Flooding Study shows lands that were used to construct the distributor road as flooding. However this road was constructed since the study was completed on a large embankment in the areas that are shown as being at risk of flooding. It would therefore be expected that this road is not impacted by the 1% AEP floodplain. This will be assessed further during the detailed Flood Risk Assessment and reported on as part of this study.

We are satisfied that the connectivity of the zoned development lands to the Rail Station and the Town Centre can be planned at detail scheme stage, to ensure that it will not be impacted by the 1% AEP flood event.

Yours sincerely,

Conor Delaney BEng MIEI
For and on behalf of RPS

Dublin | Cork | Galway | Sligo

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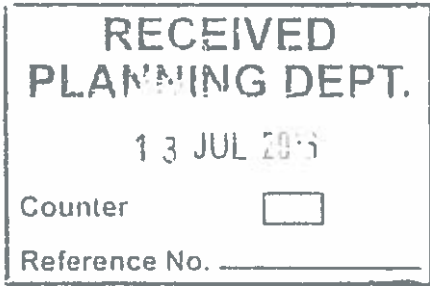
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Mr. Sean Clarke
 Administrative Officer,
 Planning Department,
 Meath County Council,
 Buvinda House,
 Dublin Road,
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 C15 Y291



13th July 2016

RE: DRAFT MINISTERIAL DIRECTION ON VARIATION NO. 3 OF THE MEATH COUNTY DEVELOPMENT PLAN 2013 - 2019

Dear Sir,

1.0 Introduction

1.1 We, the Elected Members of Meath County Council, refer to the matter of the Draft Ministerial Direction in respect of the proposed rezoning of land at Dunboyne North under Draft Variation No. 3 and wish to make the following submission.

The Meath County Development Plan 2013-2019 identified two key socio economic deficiencies i e the extent of outbound commuting and the lack of employment opportunities in the County. The Council embarked on an evidence based approach to addressing these issues by firstly preparing an Economic Strategy which was completed in 2014. The spatial implementation element of the Strategy comprises of Variation 3 of the County Development Plan and marketing consultants have been recently appointed to deliver on the employment targets set out in the Strategy. PCMA Consultants, John Spain and Associates and Jim Devlin of FTI Consultants were retained by the Council to prepare the Economic Strategy and the Spatial Implementation Plan. The foregoing provides background to the process and sets out the rationale for the Council's intervention in the economic future of the County as envisaged in 'Putting People First 2012 ' and the Local Government Reform Act 2014 which requires local authorities to take a lead role in economic regeneration and employment creation. Part of this process included a collaborative approach with officials from the Department of Environment, Community and Local Government and other stakeholders including IDA, Enterprise Ireland and Chambers of Commerce who participated in the work of the Internal Technical Working Group for the preparation of the Economic Strategy.

1.2 The Elected Members as part of the statutory process of the variation considered the contents of the submission of the Department of Environment of 27th January 2016. The Chief Executive wrote to the Principal Planning Advisor at the Department of Environment on 13th April 2016 stating as follows: 'I am satisfied to confirm on behalf of Meath County Council that we have complied with all your requests regarding all matters under our direct control.' The Executive of the Council obtained

Senior Counsel opinion in respect of the content of the submission of the Department of Environment of 19th April 2016 as it related to the Dunboyne North/Pace lands and said opinion stated that it was not open to the Elected Members to consider the contents of same at the amendment stage of the process.

1.3 The development of the subject lands for a 'live work' community is fully supported by the Elected Members and the Executive of Meath County Council, the Planning and Economic Development Strategic Policy Committee and the Meath Economic Forum.

2.0 Variation No. 3 of the Meath County Development Plan 2013 - 2019

2.1 The key purpose of Variation No. 3 of the Meath County Development Plan 2013 - 2019 is to align the County Development Plan with the key tenets of the Economic Development Strategy for County Meath 2014 – 2022, as they relate to statutory land use planning.

2.2 The Economic Development Strategy is a very important strategy for the future sustainable development of County Meath. It identifies a number of important trends within the County, which impact on its economic performance, including a narrow base of economic activities in largely traditional areas, an FDI deficit, low penetration of knowledge-orientated activities (such as IT and professional services) and substantial skills leakage due to commuting trends from the County. It sets out an ambitious strategy which aims to foster economic development within the county, improving its attractiveness as a location for FDI presence and also creating jobs in order to address high outward commuting patterns. Both the Executive and Elected Members of Meath County Council are fully committed to implementing this Strategy.

2.3 Dunboyne is identified in the Strategy as one of five key settlements within the county where the advancement of strategic employment sites is recommended. The employment component of the live work community is the strategic site identified by the Economic Strategy. It is the only such location in the county which is also within the Metropolitan Area of the National Gateway, as defined by the Regional Planning Guidelines 2010-2022. It benefits from excellent public transport infrastructure as well as access to skills. Dunboyne is identified by the Regional Planning Guidelines 2010-2022 as a Large Growth Town projected to grow to 30,000 persons. The current population as recorded by the 2011 census is less than 9,000 persons.

2.4 We are very happy to report the fact that the Economic Development Strategy is already being successfully implemented and major new jobs have been announced for the area (please refer to map no 1 which accompanies this submission which is an extract from the Dunboyne/Clonee Growth Corridor Strategic Framework Guidance). The announcement by UK company Shire earlier this year will see new investment at Piercetown, just north of the proposed development, in the immediate environs of Dunboyne North. The Shire facility will be active in bio-pharma manufacturing on a 120-acre site and will see 400 highly skilled jobs created in the area over the next four years, with an additional 700 jobs being created during the construction phase.¹ Development of the Piercetown lands located as they are, further north than the lands subject

¹ The Shire announcement has been the largest FDI jobs announcement by the IDA so far this year – please refer to the recent IDA press release *IDA Ireland Reports Strong First Half to 2016* (<http://www.idaireland.com/newsroom/ida-strong-2016/>).

matter of this Draft Direction, renders the Dunboyne North/Pace lands, as effectively an infill site in Planning terms.

- 2.5 Also earlier this year, Avoca announced their plan to open its largest retail facility in Ireland at Dunboyne North, on the other side of the M3 to the development lands under consideration. This will see the creation of 80 jobs at the retail site in Dunboyne. Aramark, which acquired Avoca in 2015, is planning to build a European operations centre, with an estimated 500+ jobs at the site next to the M3 Parkway Rail Station. This would comprise the first planning application on the lands as identified by the requirements of the Master Plan contained within the variation documentation.
- 2.6 These critically important new investments for the area and for County Meath illustrate the jobs potential of the County, which is now being positioned as a cost-competitive location within the new EMRA Region. These new investments also show that the county is building critical momentum in regard to high skilled jobs, given that Facebook have commenced development of a major international Data Centre in Clonee, County Meath. The wider international economic context, which is highlighted in the Economic Development Strategy for County Meath has come into sharp focus in recent days following the outcome of the Brexit vote in the UK. As shown in the Economic Development Strategy, the enterprise base of County Meath is to a very large extent characterised by traditional manufacturing, with a relative paucity of FDI and knowledge-oriented economic activities when compared with the rest of the country. With the fall in the value of sterling against the euro and the uncertainty over the UK's trading position with the EU now a real threat to Ireland's economic future, there is now an especially significant threat to jobs locally in Meath, as the UK constitutes the largest export market to large enterprises based in the County operating in food processing, engineering and furniture etc. This stark fact and threat underscores the urgent need for the economic base of County Meath to be broadened, as highlighted in the Economic Development Strategy and the lands under consideration are instrumental in that regard.

3.0 Response to the Draft Ministerial Direction

- 3.1 The Draft Ministerial Direction outlines that both the Department and the Minister are of the view that the Meath County Development Plan 2013 – 2019 is not in compliance with the requirements of s.12, s.13 and s.28 of the Planning and Development Act 2000 (as amended). Sections 12 and 13 of the Act require that, in decision making on development plans, Elected 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 for the time being of the Government or any Minister of the Government.
- 3.2 Dunboyne enjoys the benefits of having two train stations – M3 Parkway Rail Station and Dunboyne Rail Station – and there is also a high quality road network in the area, providing national and regional connections. The M3 Motorway connects Dublin to Cavan and beyond and it also provides direct and convenient access to the M50 Motorway, which in turn connects to the M1, N2/M2, N4/M4, N7/M7 and the M11. Dublin Airport and Dublin Port are also within a 30-minute drive.
- 3.3 The intention for Dunboyne North is to facilitate the creation of a strategic employment hub and sustainable community, based on sustainable development principles. The main goal is to maximise the benefit of high quality public transport infrastructure (currently under utilised) in the area and to support the development of a high-quality employment campus and associated sustainable residential uses. Taking into consideration it's highly sustainable location, it's identification as a

strategically important location for employment development and the opportunities it presents in terms of facilitating substantial economic growth, we are of the view that the proposed rezoning is in keeping with the proper planning and sustainable development of the area.

- 3.4 The Draft Ministerial Direction cites Section 2.7 of the *Spatial Planning and National Roads (2012) Guidelines*, produced by the National Transport Authority, advocating that a “*comprehensive traffic assessment of such proposals [the proposed zoning of lands at Dunboyne North] to ensure the avoidance of any adverse impact on the national road infrastructure must be provided*”. The Direction goes on to state that “*the approach required by the Spatial Planning and National Roads Guidelines has not been followed... and the zoning has the potential to generate traffic volumes to limit the operation of the nearby national motorway interchange.*” Having reviewed Section 2.7 of *Spatial Planning and National Roads*, we note that there is no explicit requirement for a comprehensive traffic assessment to be undertaken at the Development Plan stage. Rather, the Guidelines outline that planning authorities must “*exercise particular care in their assessment of development plan proposals relating to the zoning of locations close to interchanges, where such development could generate significant additional traffic with potential to impact on the national road.*” This includes ensuring that such development which is consistent with planning policies can be catered for by the design assumptions underpinning such junctions and interchanges.
- 3.5 The lands at Dunboyne North are currently zoned for a more intensive form of mixed use development, including a new Town Centre development of a similar scale to Blanchardstown Town Centre, Dundrum Town Centre and Liffey Valley Shopping Centre. They have been so zoned since 2009. In fact, the current zoning of the lands, which the Draft Direction seeks to re-impose, would have a greater impact on the M3 Motorway than the proposed zoning.
- 3.6 The Elected Members of Meath County Council are not aware of any other County Council in the State having been requested to undertake such a detailed level of traffic impact assessment at the Development Plan stage, for an individual site rezoning proposal, as is suggested is required within the Draft Ministerial Direction. For example, Fingal County Council has proposed under its Draft County Development Plan 2017-2023 to rezone a very substantial amount of land for employment-related development close to the junction of the M50 and the M2. Furthermore, South Dublin County Council recently zoned additional lands for employment-related development close to the junction of the M50 and the M4, as part of its new County Development Plan. We are not aware that any detailed transport assessment of the proposals, of a comparable scale to that currently advocated, was undertaken in either instance. The Draft Ministerial Direction seems to take an inconsistent approach in this instance, suggesting that a greater level of assessment is required in County Meath than is the case elsewhere.
- 3.7 In any case, the Council's Executive is working with Transport Infrastructure Ireland to investigate the potential impacts of the County Development Plan, including Draft Variation No. 3, on the M3/N3 corridor and any requirements for improvements to the strategic road network identified will be addressed.
- 3.8 The draft Direction, also seems to take no cognisance of the very significant fact that the lands at Dunboyne North are served by a newly constructed railway line and station, M3 Parkway, comprising 1200 car parking spaces, making it a particularly suitable location for employment and residential activity. The parkway rail station and associated car park are significantly under utilised. This is a significant omission from the Draft Direction. The Executive have advised the Elected Members during the variation process that traffic consultants, Aecom, have been retained by the

Council and are tasked with providing an overview of the existing traffic and transport situation in Dunboyne. Aecom, based on this analysis will then advise how the transport network can respond in the future to development proposals on a planned incremental basis. Aecom will outline a robust strategy based on their professional opinion and knowledge of previous studies in the locality on how increased traffic arising from the 'live work' community proposed for Dunboyne North and other lands subject of the variation can be successfully managed.

- 3.9 Each planning application is considered on its own individual merits and it would be the responsibility of the developer to demonstrate the acceptability of any proposal. Statutory consultees, including the NTA and TII, will be consulted on any application, as required by the relevant regulations.
- 3.10 Outside of within Dublin, Meath experiences the highest level of outbound commuting of workers in the State. At the last census in 2011, 32,942 or 54% of the county's workforce commuted out of the county for work, with 76% of these commuters working in Dublin. Such is the extent of outbound commuting that there are almost as many people living in Meath but working in Dublin as there are living and working in the county. The overarching intention of zoning proposed in this area is to target FDI development opportunities on lands zoned in the area of the M3, including at Dunboyne North, where there is a history of such major employment developments being delivered. Delivery of FDI development will almost certainly reduce the level of outbound commuting experienced as outbound commuters represent a major talent pool for FDI companies investing in the county and are a key selling point for the county, with over 41% of those commuting holding third-level or higher educational attainment.
- 3.11 The impact on the M3 would be positive, reducing the level of commuter traffic currently using the road. This is because significant usage of the M3 by commuters bound for Dublin would decrease through the creation of substantial new employment opportunities within Meath, intercepting existing commuters and reducing the need for workers to travel further along the M3, into the most congested sections of the Motorway closer to Dublin City Centre.
- 3.12 The proposed zoning of these lands will result in significantly less traffic generation than would be the case were the currently planned Level 2 Retail Centre to be provided at Dunboyne North. Level 2 Retail Centres (for example Blanchardstown and Dundrum Town Centres and Liffey Valley Shopping Centre) generate significant traffic levels as they attract visitors from across the region and indeed the nation. The proposed 'live work community' concept would result in a sparser use of the M3 motorway, with less pressure being placed on both the Black Bull and Dunboyne North/Pace junctions.
- 3.13 The lands are located in very close proximity to a high quality public transport corridor. M3 Parkway will provide a reliable alternative to the private car for people living and working at Dunboyne North. With the completion of the Luas Cross City to Broombridge Station, Dunboyne North will be connected by rail to the rail and tram network of the GDA, in a highly transport efficient and integrated manner. As has been already outlined, the Council's intention is that employment creation on these lands will intercept commuters who currently leave the county for work and it is logical that the Council should seek to direct this type of development to areas which are accessible by public transport. This is a significant advantage of the Dunboyne North lands, which is not available elsewhere in County Meath.

In relation to the current zoning of the lands, we note that the Draft Ministerial Direction indicates that the new Regional Spatial and Economic Strategy for the region may include a *“review of the long term Level 2 retail designation at Dunboyne”*. The Direction suggests that the absence of any development on these lands to date may be a viability issue, given its close proximity to the Blanchardstown Centre in Fingal, also suggesting that the proposed rezoning of the lands is based on the regional retail designation of Dunboyne, that has now been translated into separate ‘isolated’ residential Objective ‘A2’ and employment Objective ‘E1/E3’ zonings. This statement is not accepted as being accurate. It also appears to pre-empt the future decision making role of the constituent members of EMRA in regard to these matters. We, the Elected Members view this statement with concern.

- 3.14 The proposed rezoning of the lands is not based on the regional retail designation of Dunboyne; rather it is based on the recommendations of the Economic Development Strategy and it involves a fundamental reconsideration of the most appropriate future use of the lands in that context. If there were to be a review of the long term Level 2 retail designation at Dunboyne as part of the new RSES, as the Draft Direction suggests, there would be a requirement to put in place a strategy for the alternative development of these strategically important lands; this is precisely what Draft Variation No. 3 seeks to do.
- 3.15 In relation to the origin and rationale for the proposed allocation of 500 housing units to Dunboyne North, attention is firstly drawn to the fact that the 2-year Progress Report on the County Development Plan identified that there are now 641 multiple housing units less committed in the county than when the table was originally prepared. Given the well-documented and significant housing shortage within the Greater Dublin Area, it is considered to be of paramount importance that lands which can sustainably accommodate the identified shortfall are identified and brought forward for development. National planning guidance provided policy direction in this regard by allocating a higher percentage of core strategy dwelling unit numbers to the Metropolitan Area at the expense of the Hinterland Area.
- 3.16 The Meath EMRA Assembly Members met with EMRA's Director and Senior Planner on the 6th July 2016. This meeting was also attended by the Council's consultants John Spain and Paul McCloughan who briefed the meeting on the planning and economic background to the Variation. A robust discussion followed on current economic challenges to the area including Brexit. I, as the current Chair of Meath County Council and a member from the Ratoath Municipal District outlined in detail the significant issues being raised by constituents on a daily basis regarding housing supply in the Dunboyne Area. This includes a serious lack of available rentable properties for young couples. I also advised that only 13 commencement notices had been lodged in Dunboyne since early 2014 and that while there are a number of large scale sites with phase 1 residential zoning developers are not willing to move or the land owners have no interest in developing their lands. The Members expressed the view that the current Regional Planning Guidelines are well out of date. At this meeting John Spain advised on the concept of ‘live work communities’ as being a well established planning principle in an Irish planning context, having formed a key aspect of the Adamstown, Clonburris, Cherrywood and Monard Strategic Development Zones. These SDZ sites are framed around the concept of being a highly sustainable, dense, mixed-use community, focused on key public transport nodes. He indicated that there is further evidence of this approach available by reviewing recent zoning of lands at Woodbrook, Dun Laoghaire Rathdown. Woodbrook and Monard lands are physically separated from the nearest adjoining settlement and their zoning for development has demonstrated the acceptability in principle of identifying lands in close proximity to a public transport corridor for residential development, even though these lands are not connected

to the nearest settlement. In both of these instances it has obviously been accepted that there is an inherent sustainability in directing residential development to locations proximate to high quality public transport infrastructure.

3.17 The Draft Ministerial Direction states that *"this proposed housing would be detached and distant from the established social, community and other infrastructure of the town. A new residential zoning/development significantly to the north of the established town at Pace (1.5-2km) would be a clear breach of the sequential approach to the zoning of lands identified in Section 4.19 of the Development Plan Guidelines (2007)...The planning guidelines on Development Plans state that zoning should 'extend out from the centre of an urban area, with undeveloped lands closest to the core and public transport routes being given preference."*

3.18 The Draft Direction does not take into account the fact that the Development Plan Guidelines for Planning Authorities also advocate, at Section 3.11, pursuing opportunities for synergies between land-use and transport planning. It is outlined that *"Integrated land use and transport planning has a key role in delivering social, economic, and environmental sustainability."* This is of critical importance in the current circumstances because this is exactly what Meath County Council is attempting to do.

3.19 Where all areas of the land proposed to be rezoned for new housing are within approximately 600m of M3 Parkway (a public transport hub), in a highly sustainable location, we are of the view that the proposal accords with the principles and spirit of both the Development Plan Guidelines for Planning Authorities and the Local Area Plan Guidelines in relation to the zoning of land. We therefore believe that the Dunboyne North lands offer the most sustainable option for the reallocation of this housing as they provide an excellent opportunity to facilitate a move towards sustainable modes of transport and they will provide high quality housing in close proximity to a substantial employment location.

3.20 The Draft Ministerial Direction considers that the proposal for development at Dunboyne North constitutes development outside Dunboyne which is inappropriate. The Elected Members of Meath County Council categorically do not accept that this site is remote from or indeed outside Dunboyne as it represents a natural expansion of the town connected by a strategic use of the flood plain as green infrastructure (incorporating a linear park and walking/cycling routes) delivering robust multi-modal connectivity to the town centre. Specifically the Dunboyne/Clonee Growth Corridor Strategic Framework identifies opportunities for creation of a green network of multi user routes to enhance linkages between the main areas of planned and existing housing, work and social activities by the creation of a green spine or linear park adjacent to the Tolka River thereby linking the entire corridor on opposite ends while assisting with climate change adaption. The vision for Dunboyne as contained within this document shall provide for sustainable rail based consolidation of the expanding Dunboyne area over the period of the current and future County Development Plans consistent with the town's designation as a Large Growth Town II by the RPGs providing major employment uses for an expanding population of up to 30,000 persons. The utilization of both rail based hubs to facilitate this growth is imperative together with the opportunity to provide integration through green infrastructure. The attached map no 2 also indicates that the lands are at a minimum equi-distant from the town centre with the zoned residential land to the south of the town. The entirety of the lands are furthermore located within the Metropolitan Area and comprise an infill development given the establishment of substantial employment and services land uses further to the north on the opposite side of the M3. The lands the subject of the Draft Direction are furthermore located within the same parish as the town centre. It should be noted that based on the Council's experience to date, investors

see this area as a prime employment location. Recent enquiries from prospective investors to Meath County Council, clearly demonstrates the economic and employment potential of the said lands and the concept of a 'live work ' community, which is clearly attractive to investors, at a time when accommodation has become even more important in the mix of competitiveness criteria for Foreign Direct Investment.

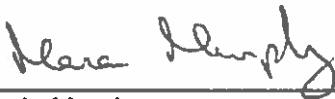
3.21 Finally, to respond to the requirement to return the lands at Dunboyne North to their current zoning, transport stakeholders have indicated to the Executive their preference to remove the Level II objective from the lands. In discussions they express the view that a lower intensity mix of land uses was preferable because of their concern regarding the potential traffic generation likely to arise from a Level II development. The Economic Development Strategy for the county identifies the strategic importance of the lands to the economic future of the county and the Draft Variation represents a fundamental reconsideration of the most appropriate future use of the lands in that context. We consider that the proposed rezoning provides for the proper planning and sustainable development of the area.

3.22 Conclusion

This letter is submitted on behalf of the Elected Members of Meath County Council, in respect of the Draft Ministerial Direction received in relation to Draft Variation No. 3 of the Meath County Development Plan 2013 - 2019.

We would request that the contents of this letter, supported by the full membership of Meath County Council is taken into consideration in the determination of this matter.

Yours sincerely,



Cllr Maria Murphy
Cathaoirleach, Meath County Council
On behalf of the Elected Members of Meath County Council



Map 1.

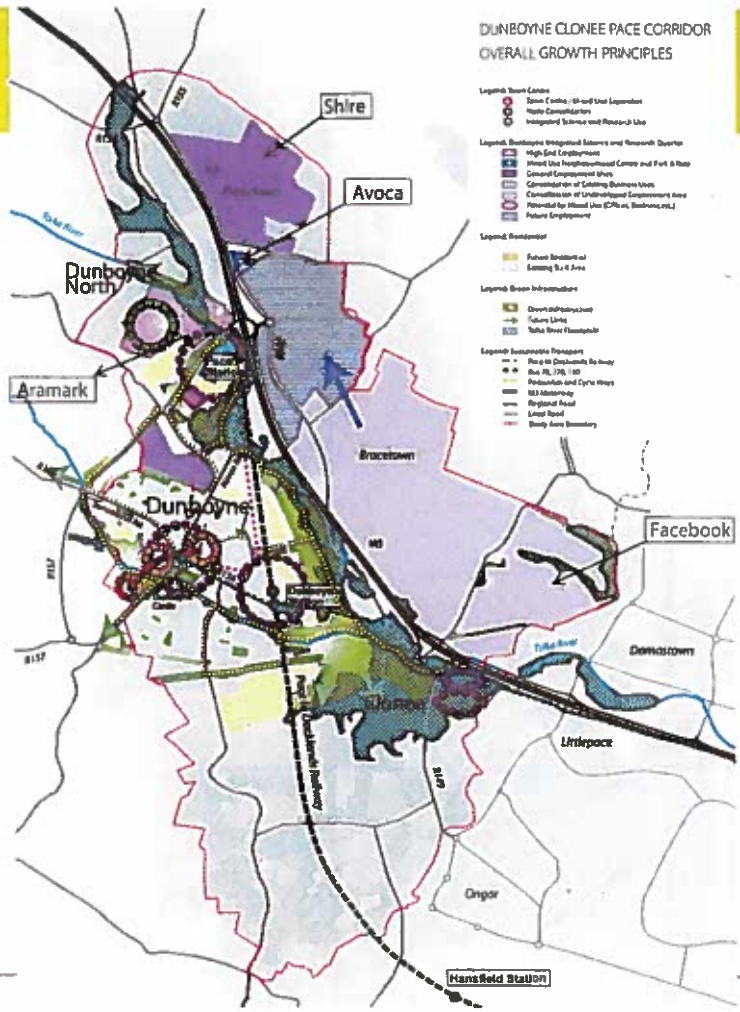


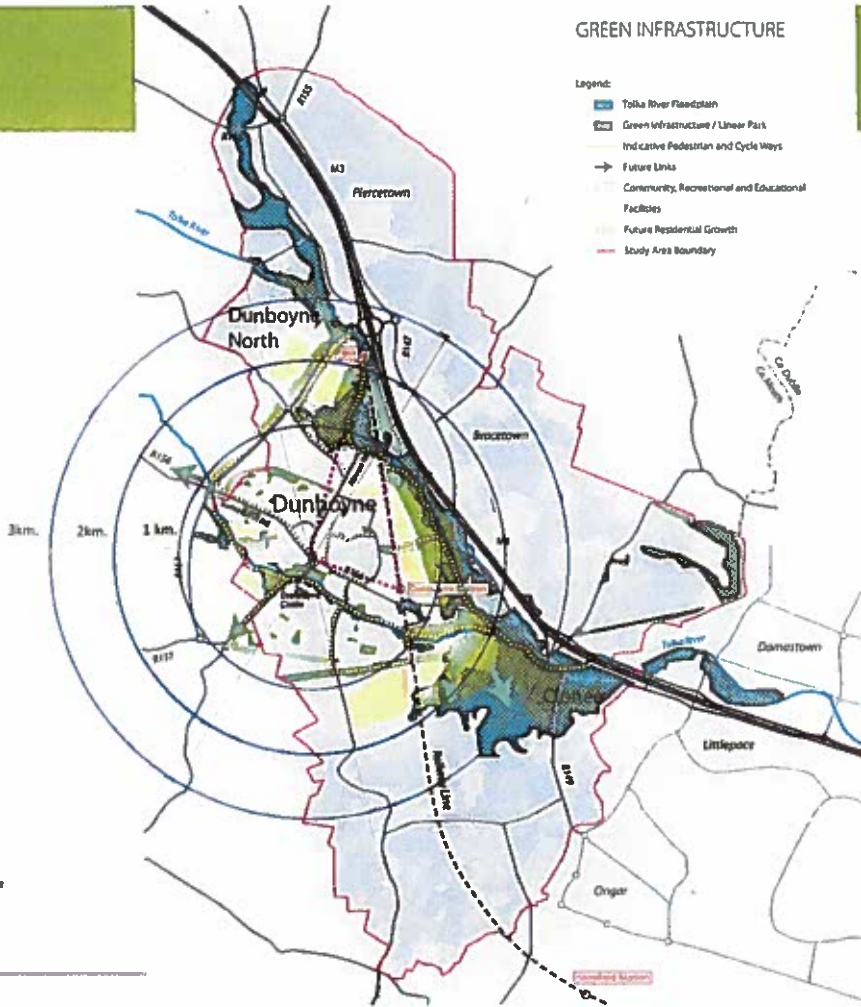
Figure S.1: Overall Growth





GREEN INFRASTRUCTURE

- Legend:
- Tolka River Floodplain
 - Green Infrastructure / Linear Park
 - Indicative Pedestrian and Cycle Ways
 - Future Links
 - Community, Recreational and Educational Facilities
 - Future Residential Growth
 - Study Area Boundary



Map 2.

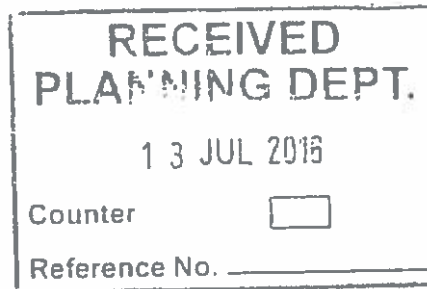
Figure 4.4: Green Infrastructure

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- 3.1 The Draft Ministerial Direction outlines that both the Department and the Minister are of the view that the Meath County Development Plan 2013 – 2019 is not in compliance with the requirements of s.12, s.13 and s.28 of the Planning and Development Act 2000 (as amended). Sections 12 and 13 of the Act require that, in decision making on development plans, Elected 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 for the time being of the Government or any Minister of the Government.
- 3.2 Dunboyne enjoys the benefits of having two train stations – M3 Parkway Rail Station and Dunboyne Rail Station – and there is also a high quality road network in the area, providing national and regional connections. The M3 Motorway connects Dublin to Cavan and beyond and it also provides direct and convenient access to the M50 Motorway, which in turn connects to the M1, N2/M2, N4/M4, N7/M7 and the M11. Dublin Airport and Dublin Port are also within a 30-minute drive.

¹ The Shire announcement has been the largest FDI jobs announcement by the IDA so far this year – please refer to the recent IDA press release *IDA Ireland Reports Strong First Half to 2016* (<http://www.idaireland.com/newsroom/ida-strong-2016/>).

- 3.3 The intention for Dunboyne North is to facilitate the creation of a strategic employment hub and sustainable community, based on sustainable development principles. The main goal is to maximise the benefit of high quality public transport infrastructure (currently under utilised) in the area and to support the development of a high-quality employment campus and associated sustainable residential uses. Taking into consideration its highly sustainable location, its identification as a strategically important location for employment development and the opportunities it presents in terms of facilitating substantial economic growth, we are of the view that the proposed rezoning is in keeping with the proper planning and sustainable development of the area.
- 3.4 The Draft Ministerial Direction cites Section 2.7 of the *Spatial Planning and National Roads (2012) Guidelines*, produced by the National Transport Authority, advocating that a *"comprehensive traffic assessment of such proposals [the proposed zoning of lands at Dunboyne North] to ensure the avoidance of any adverse impact on the national road infrastructure must be provided"*. The Direction goes on to state that *"the approach required by the Spatial Planning and National Roads Guidelines has not been followed... and the zoning has the potential to generate traffic volumes to limit the operation of the nearby national motorway interchange."* Having reviewed Section 2.7 of *Spatial Planning and National Roads*, we note that there is no explicit requirement for a comprehensive traffic assessment to be undertaken at the Development Plan stage. Rather, the Guidelines outline that planning authorities must *"exercise particular care in their assessment of development plan proposals relating to the zoning of locations close to interchanges, where such development could generate significant additional traffic with potential to impact on the national road."* This includes ensuring that such development which is consistent with planning policies can be catered for by the design assumptions underpinning such junctions and interchanges.
- 3.5 The lands at Dunboyne North are currently zoned for a more intensive form of mixed use development, including a new Town Centre development of a similar scale to Blanchardstown Town Centre, Dundrum Town Centre and Liffey Valley Shopping Centre. They have been so zoned since 2009. In fact, the current zoning of the lands, which the Draft Direction seeks to re-impose, would have a greater impact on the M3 Motorway than the proposed zoning.
- 3.6 The Elected Members of Meath County Council are not aware of any other County Council in the State having been requested to undertake such a detailed level of traffic impact assessment at the Development Plan stage, for an individual site rezoning proposal, as is suggested is required within the Draft Ministerial Direction. For example, Fingal County Council has proposed under its Draft County Development Plan 2017-2023 to rezone a very substantial amount of land for employment-related development close to the junction of the M50 and the M2. Furthermore, South Dublin County Council recently zoned additional lands for employment-related development close to the junction of the M50 and the M4, as part of its new County Development Plan. We are not aware that any detailed transport assessment of the proposals, of a comparable scale to that currently advocated, was undertaken in either instance. The Draft Ministerial Direction seems to take an inconsistent approach in this instance, suggesting that a greater level of assessment is required in County Meath than is the case elsewhere.
- 3.7 In any case, the Council's Executive is working with Transport Infrastructure Ireland to investigate the potential impacts of the County Development Plan, including Draft Variation No. 3, on the M3/N3 corridor and any requirements for improvements to the strategic road network identified will be addressed.

- 3.8 The draft Direction, also seems to take no cognisance of the very significant fact that the lands at Dunboyne North are served by a newly constructed railway line and station, M3 Parkway, comprising 1200 car parking spaces, making it a particularly suitable location for employment and residential activity. The parkway rail station and associated car park are significantly under utilised. This is a significant omission from the Draft Direction. The Executive have advised the Elected Members during the variation process that traffic consultants, Aecom, have been retained by the Council and are tasked with providing an overview of the existing traffic and transport situation in Dunboyne. Aecom, based on this analysis will then advise how the transport network can respond in the future to development proposals on a planned incremental basis. Aecom will outline a robust strategy based on their professional opinion and knowledge of previous studies in the locality on how increased traffic arising from the 'live work' community proposed for Dunboyne North and other lands subject of the variation can be successfully managed.
- 3.9 Each planning application is considered on its own individual merits and it would be the responsibility of the developer to demonstrate the acceptability of any proposal. Statutory consultees, including the NTA and TII, will be consulted on any application, as required by the relevant regulations.
- 3.10 Outside of within Dublin, Meath experiences the highest level of outbound commuting of workers in the State. At the last census in 2011, 32,942 or 54% of the county's workforce commuted out of the county for work, with 76% of these commuters working in Dublin. Such is the extent of outbound commuting that there are almost as many people living in Meath but working in Dublin as there are living and working in the county. The overarching intention of zoning proposed in this area is to target FDI development opportunities on lands zoned in the area of the M3, including at Dunboyne North, where there is a history of such major employment developments being delivered. Delivery of FDI development will almost certainly reduce the level of outbound commuting experienced as outbound commuters represent a major talent pool for FDI companies investing in the county and are a key selling point for the county, with over 41% of those commuting holding third-level or higher educational attainment.
- 3.11 The impact on the M3 would be positive, reducing the level of commuter traffic currently using the road. This is because significant usage of the M3 by commuters bound for Dublin would decrease through the creation of substantial new employment opportunities within Meath, intercepting existing commuters and reducing the need for workers to travel further along the M3, into the most congested sections of the Motorway closer to Dublin City Centre.
- 3.12 The proposed zoning of these lands will result in significantly less traffic generation than would be the case were the currently planned Level 2 Retail Centre to be provided at Dunboyne North. Level 2 Retail Centres (for example Blanchardstown and Dundrum Town Centres and Liffey Valley Shopping Centre) generate significant traffic levels as they attract visitors from across the region and indeed the nation. The proposed 'live work community' concept would result in a sparser use of the M3 motorway, with less pressure being placed on both the Black Bull and Dunboyne North/Pace junctions.
- 3.13 The lands are located in very close proximity to a high quality public transport corridor. M3 Parkway will provide a reliable alternative to the private car for people living and working at Dunboyne North. With the completion of the Luas Cross City to Broombridge Station, Dunboyne North will be connected by rail to the rail and tram network of the GDA, in a highly transport efficient and

integrated manner. As has been already outlined, the Council's intention is that employment creation on these lands will intercept commuters who currently leave the county for work and it is logical that the Council should seek to direct this type of development to areas which are accessible by public transport. This is a significant advantage of the Dunboyne North lands, which is not available elsewhere in County Meath.

In relation to the current zoning of the lands, we note that the Draft Ministerial Direction indicates that the new Regional Spatial and Economic Strategy for the region may include a *"review of the long term Level 2 retail designation at Dunboyne"*. The Direction suggests that the absence of any development on these lands to date may be a viability issue, given its close proximity to the Blanchardstown Centre in Fingal, also suggesting that the proposed rezoning of the lands is based on the regional retail designation of Dunboyne, that has now been translated into separate 'isolated' residential Objective 'A2' and employment Objective 'E1/E3' zonings. This statement is not accepted as being accurate. It also appears to pre-empt the future decision making role of the constituent members of EMRA in regard to these matters. We, the Elected Members view this statement with concern.

- 3.14 The proposed rezoning of the lands is not based on the regional retail designation of Dunboyne; rather it is based on the recommendations of the Economic Development Strategy and it involves a fundamental reconsideration of the most appropriate future use of the lands in that context. If there were to be a review of the long term Level 2 retail designation at Dunboyne as part of the new RSES, as the Draft Direction suggests, there would be a requirement to put in place a strategy for the alternative development of these strategically important lands; this is precisely what Draft Variation No. 3 seeks to do.
- 3.15 In relation to the origin and rationale for the proposed allocation of 500 housing units to Dunboyne North, attention is firstly drawn to the fact that the 2-year Progress Report on the County Development Plan identified that there are now 641 multiple housing units less committed in the county than when the table was originally prepared. Given the well-documented and significant housing shortage within the Greater Dublin Area, it is considered to be of paramount importance that lands which can sustainably accommodate the identified shortfall are identified and brought forward for development. National planning guidance provided policy direction in this regard by allocating a higher percentage of core strategy dwelling unit numbers to the Metropolitan Area at the expense of the Hinterland Area.
- 3.16 The Meath EMRA Assembly Members met with EMRA's Director and Senior Planner on the 6th July 2016. This meeting was also attended by the Council's consultants John Spain and Pat McCloughan who briefed the meeting on the planning and economic background to the Variation. A robust discussion followed on current economic challenges to the area including Brexit. Cllr Maria Murphy as the current Chair of Meath County Council and a member from this Municipal District outlined in detail the significant issues being raised by constituents on a daily basis regarding housing supply in the Dunboyne Area. This includes a serious lack of available rentable properties for young couples. Cllr Murphy also advised that only 13 commencement notices had been lodged in Dunboyne since early 2014 and that while there are a number of large scale sites with phase 1 residential zoning developers are not willing to move or the land owners have no interest in developing their lands. The Members expressed the view that the current Regional Planning Guidelines are well out of date. At this meeting John Spain advised on the concept of 'live work communities' as being a well established planning principle in an Irish planning context, having formed a key aspect of the Adamstown, Clonburris, Cherrywood and Monard Strategic Development

Zones. These SDZ sites are framed around the concept of being a highly sustainable, dense, mixed-use community, focused on key public transport nodes. He indicated that there is further evidence of this approach available by reviewing recent zoning of lands at Woodbrook, Dun Laoghaire Rathdown. Woodbrook and Monard lands are physically separated from the nearest adjoining settlement and their zoning for development has demonstrated the acceptability in principle of identifying lands in close proximity to a public transport corridor for residential development, even though these lands are not connected to the nearest settlement. In both of these instances it has obviously been accepted that there is an inherent sustainability in directing residential development to locations proximate to high quality public transport infrastructure.

- 3.17 The Draft Ministerial Direction states that *"this proposed housing would be detached and distant from the established social, community and other infrastructure of the town. A new residential zoning/development significantly to the north of the established town at Pace (1.5-2km) would be a clear breach of the sequential approach to the zoning of lands identified in Section 4.19 of the Development Plan Guidelines (2007)...The planning guidelines on Development Plans state that zoning should 'extend out from the centre of an urban area, with undeveloped lands closest to the core and public transport routes being given preference."*
- 3.18 The Draft Direction does not take into account the fact that the Development Plan Guidelines for Planning Authorities also advocate, at Section 3.11, pursuing opportunities for synergies between land-use and transport planning. It is outlined that *"Integrated land use and transport planning has a key role in delivering social, economic, and environmental sustainability."* This is of critical importance in the current circumstances because this is exactly what Meath County Council is attempting to do.
- 3.19 Where all areas of the land proposed to be rezoned for new housing are within approximately 600m of M3 Parkway (a public transport hub), in a highly sustainable location, we are of the view that the proposal accords with the principles and spirit of both the Development Plan Guidelines for Planning Authorities and the Local Area Plan Guidelines in relation to the zoning of land. We therefore believe that the Dunboyne North lands offer the most sustainable option for the reallocation of this housing as they provide an excellent opportunity to facilitate a move towards sustainable modes of transport and they will provide high quality housing in close proximity to a substantial employment location.
- 3.20 The Draft Ministerial Direction considers that the proposal for development at Dunboyne North constitutes development outside Dunboyne which is inappropriate. The Elected Members of Meath County Council categorically do not accept that this site is remote from or indeed outside Dunboyne as it represents a natural expansion of the town connected by a strategic use of the flood plain as green infrastructure (incorporating a linear park and walking/cycling routes) delivering robust multi-modal connectivity to the town centre. Specifically the Dunboyne/Clonee Growth Corridor Strategic Framework identifies opportunities for creation of a green network of multi user routes to enhance linkages between the main areas of planned and existing housing, work and social activities by the creation of a green spine or linear park adjacent to the Tolka River thereby linking the entire corridor on opposite ends while assisting with climate change adaption. The vision for Dunboyne as contained within this document shall provide for sustainable rail based consolidation of the expanding Dunboyne area over the period of the current and future County Development Plans consistent with the town's designation as a Large Growth Town II by the RPGs providing major employment uses for an expanding population of up to 30,000 persons. The utilization of both rail based hubs to facilitate this growth is imperative together with the opportunity to provide integration through green infrastructure.

The attached map no 2 also indicates that the lands are at a minimum equi-distant from the town centre with the zoned residential land to the south of the town. The entirety of the lands are furthermore located within the Metropolitan Area and comprise an infill development given the establishment of substantial employment and services land uses further to the north on the opposite side of the M3. The lands the subject of the Draft Direction are furthermore located within the same parish as the town centre. It should be noted that based on the Council's experience to date, investors see this area as a prime employment location. Recent enquiries from prospective investors to Meath County Council, clearly demonstrates the economic and employment potential of the said lands and the concept of a 'live work ' community, which is clearly attractive to investors, at a time when accommodation has become even more important in the mix of competitiveness criteria for Foreign Direct Investment.

3.21 Finally, to respond to the requirement to return the lands at Dunboyne North to their current zoning, transport stakeholders have indicated to the Executive their preference to remove the Level II objective from the lands. In discussions they express the view that a lower intensity mix of land uses was preferable because of their concern regarding the potential traffic generation likely to arise from a Level II development. The Economic Development Strategy for the county identifies the strategic importance of the lands to the economic future of the county and the Draft Variation represents a fundamental reconsideration of the most appropriate future use of the lands in that context. We consider that the proposed rezoning provides for the proper planning and sustainable development of the area.

3.22 Conclusion

This letter is submitted on behalf of the Elected Members of the Ratoath Municipal District of Meath County Council, in respect of the Draft Ministerial Direction received in relation to Draft Variation No. 3 of the Meath County Development Plan 2013 - 2019.

We would request that the contents of this letter, supported by the full membership of Meath County Council is taken into consideration in the determination of this matter.

Yours sincerely,



Cllr Gillian Toole
Cathaoirleach, Ratoath Municipal District Meath County Council

On behalf of the Elected Members of the Ratoath Municipal District of Meath County Council



5

Map 1.

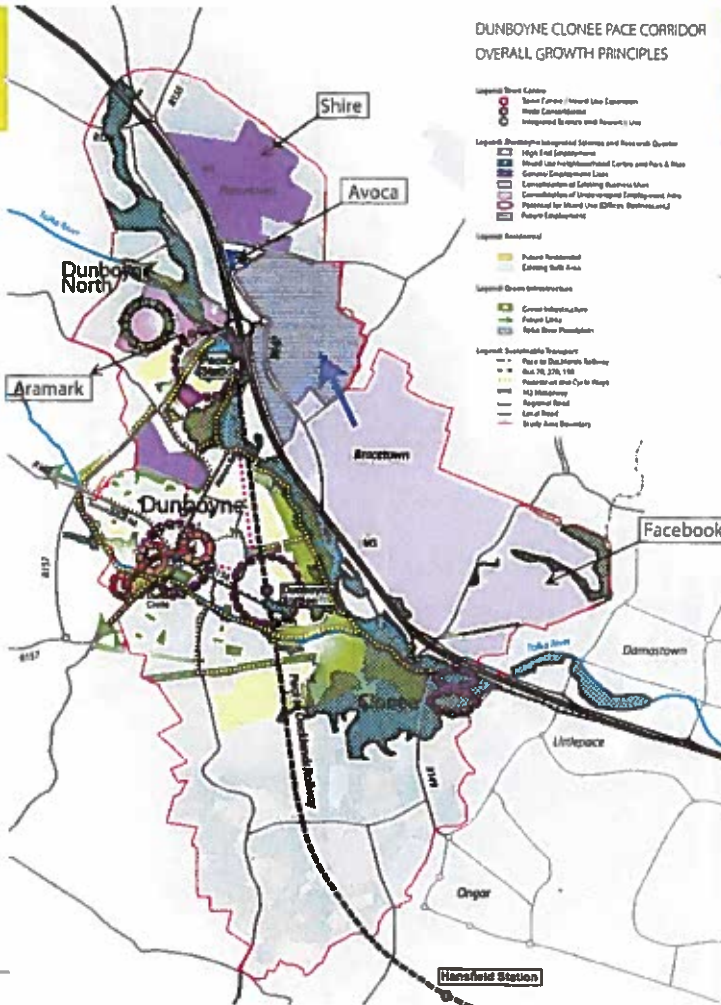
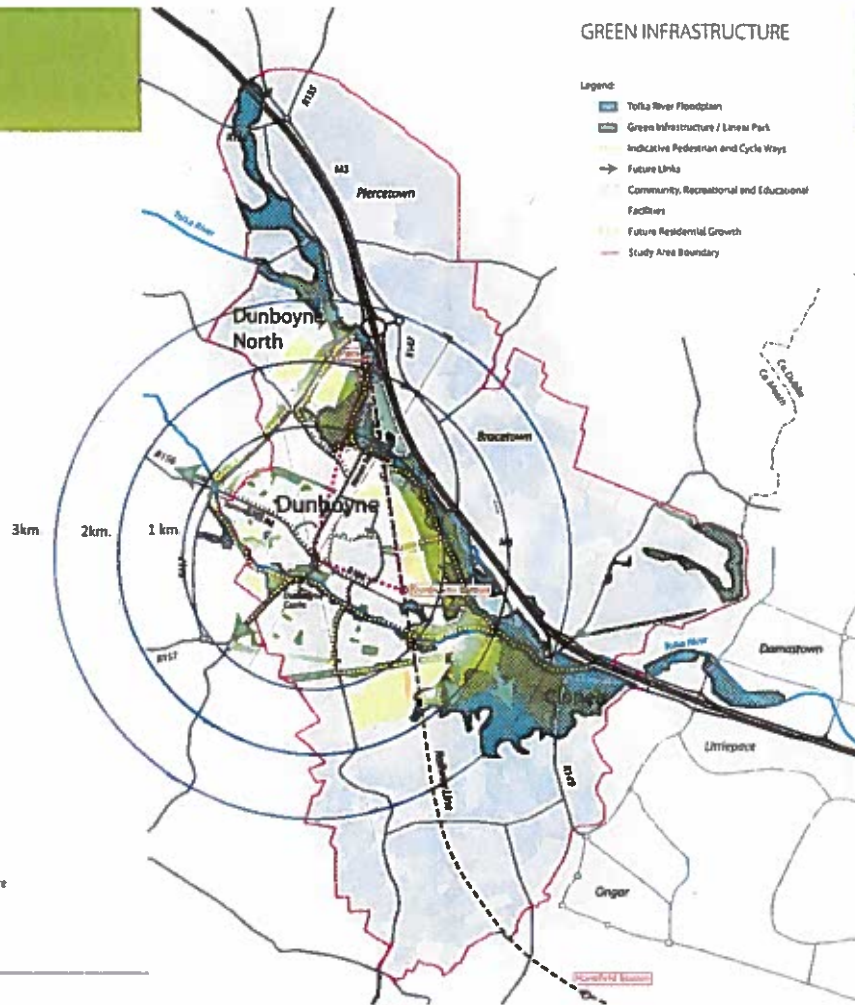


Figure S.1: Overall Growth



Map 2.

Figure 4.4: Green Infrastructure

APPENDIX C

**LETTER FROM MEATH COUNTY COUNCIL
CHIEF EXECUTIVE TO NIALL CUSSEN,
PRINCIPAL PLANNING ADVISOR,
DEPARTMENT OF ENVIRONMENT,
COMMUNITY AND LOCAL GOVERNMENT,
13TH APRIL 2016.**

Comhairle Chontae na Mí

Halla an Chontae, An Uaimh, Co. na Mí, C15 AW81
Fón: 046 – 9097000/Fax: 046 – 9097001
R-phost: customerservice@meathcoco.ie
Web: www.meath.ie



Meath County Council

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E-mail: customerservice@meathcoco.ie
Web: www.meath.ie

Mr. Niall Cussen,
Principal Adviser,
Forward Planning Section,
Department Environment, Community and Local Government,
Custom House,
Dublin 1.

13th April, 2016.

Re: Variation No.3 Meath County Development Plan 2013-2019

Dear Niall,

I refer to the Department's submission in the above regard dated 27th January 2016 and I wish to advise as follows:

Firstly, I wish to acknowledge and thank you for meeting with me yesterday April 12th, and also for the previous meeting held with your staff which was attended by my Director and Senior Planning Staff. As I mentioned yesterday they found the meeting to be most helpful and we look forward to continuing to work closely with the Department in the future.

The full implementation of the 'Economic Development Strategy for County Meath 2014-2022' of which Variation No.3 is a key component is of central importance to both the Executive and Elected Members of Meath County Council. I welcome the engagement of the Department in this ongoing process and in particular the detailed largely positive submission received in respect of the draft variation and as I stated yesterday we have done our utmost to comply as fully as possible with the terms of same.

As we discussed yesterday Variation No. 3 seeks to align the County Development Plan 2013-2019 with the main tenets of the strategy and you will recall that I wrote to you previously updating you on the progress being made by Meath County Council in that regard on 17th July 2014. I specifically noted in our correspondence that the Council had been working collaboratively with your staff, and in particular Mr Bruce McCormack, former Department Inspector for County Meath. I recorded at that time the Council's gratitude to Bruce for his contribution which is viewed as an essential component to the successful delivery of this project through his pro-active assistance to and participation in the work of both the internal Technical Working Group and the Meath Economic Forum.

I stated that Meath County Council was seeking to develop an integrated policy platform based on the effective synergising of the spatial planning process with the delivery of primary economic objectives in the national interest in order to ensure that Meath could play a greater role in the future development of the Metropolitan Area of the GDA in accordance with both the National Spatial Strategy and the Regional Planning Guidelines. I noted at the time that the socio economic profile of the county as identified by the 'Meath Economic Baseline Study' carried out by Maynooth University indicated an intercensal population growth of 13.1% and a fall of 5.2% of total employment. Same is further exacerbated by the highest out of county commuting in the State with the exception of Dublin and the resultant negative implications for the quality of life of our communities through the degradation of social capital in the county.

I also set out for your attention a separate note on the rigorous evidence based methodology being implemented and the anticipated outcomes aligned with key employment targets outlined in national policy. Variation No. 3 thus represents the culmination of an integrated and collaborative process with many

internal and external stakeholders over a considerable time-frame.

The foregoing gives a contextual backdrop to the current variation and sets out the rationale to the Council's intervention in the economic future of the county as envisaged in 'Putting People First 2012' and the Local Government Reform Act 2014 which requires local authorities to take a lead role in economic regeneration and employment creation.

A particular focus of the Variation is the identification of strategic employment sites in the main settlement centres of the county i.e. Navan, Drogheda and Dunbooyne. This approach was strongly recommended to the Council by Economic and Planning Consultancies Pat McCloughan and Associates (PMCA) and John Spain and Associates (JSA) as a critical action which the Council should pursue.

The focus of said action was to achieve a satisfactory alignment with national support for job creation and specifically address the identified weakness of the FDI sector in County Meath which constitutes less than 50% of the national average for the sector. In the context of Dunbooyne this approach specifically supports the role of the Metropolitan Area in County Meath through the redirection of approved but unused residential capacity from hinterland areas within the county. I noted yesterday that very little progress was being made on the residential supply side in the area at present and same is evident by the pronounced lack of Commencement Notices being received by the Council.

I also noted yesterday that the identification by the Consultants of the key strategic employment site at Dunbooyne North supported by a 'live work' community in an access rich multi-modal environment served by public transport was also strongly supported by the Council's Planning and Economic Development SPC and the Meath Economic Forum. The future 'live work' community will be master planned in a process that will be directly managed by professional planning staff. A key element of this supervised transparent process will be the requirement contained in the draft variation that employment development is front loaded. This will ensure that the area, in conjunction with other lands in the vicinity, will play its part in reducing levels of outbound commuting.

In response to your requirement that the three key areas listed on page 6 of your submission be responded to in the context of relevant National and Regional Policy, as the amendments which are on public display until 19th April 2016 illustrate, the Council have complied with your requests as they pertain to the following:

1. Insertion of a spot objective for FDI on lands proposed to be zoned between the ' Facebook site' and Bracetown Business Park which ensures that the lands are regulated to focus on large footprint FDI type projects.
2. Reintroduction of Phase II employment lands in lower tier centres to avoid any drift towards non-economic development enterprise uses emerging in such centres.
(While not listed as a key area, we have incorporated textual changes to the white land objective and have provided clarification of employment use classes.)
3. In respect of the third key area identified I note the reservations expressed in the submission regarding the residential element of the proposed 'live work' community at Dunbooyne North. I welcome that the Department has expressed no concerns with the other land uses proposed at this location. You will be aware that the Council procured independent planning advice to assist with the preparation of the variation, analysis of submissions etc. The consistent advice from the consultancy team is that this 'live work community' model is compliant with the proper planning and sustainable development of the area and would enable maximum benefit to be accrued from the substantial public investment in largely underutilised multi-modal transportation infrastructure in this area.

The designation of the said lands for a Level 2 Retail Centre in the current Local Area Plan are subject to the requirement that a unitary Framework Plan be prepared. The written objective pertaining to the lands specifically envisages a mixed use development at this location in conjunction with adjacent white lands which would comprise: *“some high density and other appropriate residential development commensurate with population growth over the time period of the County Development Plan.”* This objective is identified in the draft variation documentation as strikethrough and is thus proposed to be removed from the County Development Plan.

The current status of the lands, in particular the existing residential component targeted for the lands, was specifically referred to by the Members of the Council at their meeting of 7th March 2016 as being a relevant matter which I am requested to consider in my response to your letter. This is particularly relevant in the context of possible future difficulties regarding a removal of the residential element of the ‘live work’ community at Dunboyne North. During the debate arising from the presentation of the Chief Executive’s report strong support for the ‘live work’ community concept at this location was expressed. Furthermore, the Elected Members raised the possibility that the carrying out of this element of your request by the Council (which seeks to remove a single element of an integrated proposal) would, as they understood it, result in the reinstatement of the Level 2 status to the lands.

I note that the third key area identified also refers to *“proper traffic and transport appraisal of all development policies”*. With regard to future transport planning in this area (which is of key National Importance being a constituent part of the Metropolitan Area of the GDA) I have given some thought to the need for such further transportation studies in consultation with relevant stakeholders in addition to the ongoing M3 junction study being carried out by Aecom on behalf of TII in conjunction with Meath and Fingal County Councils. In this context, and having regard to the commencement of the review of the Meath County Development Plan in the current year, I have directed my Senior Transportation Staff to prepare an immediate proposal for additional transportation studies for this key area.

In summary, I am satisfied to confirm on behalf of Meath County Council that we have complied with your requests regarding all matters under our direct control. We have fully considered the point raised regarding the residential element of the ‘live work’ community at Dunboyne. As we discussed yesterday, residential affordability is currently a key National concern and as noted, it is emerging in relevant studies as a key barrier to attraction of FDI particularly in the Metropolitan Area of the GDA. Meath County Council’s records indicate that since 2014 we have received Commencement Notices for 13 dwellings in the Dunboyne area. This level of residential activity is a poor reflection on the designation of the area as a major Growth Centre in the Metropolitan area with a designated target population of 25,000 persons by 2036. The progress of the settlement to date represents a poor return on the public investment in front-loaded transport infrastructure in the area.

As discussed yesterday Meath County Council have made significant progress in implementing national policy as it pertains to the area of job creation and Variation No.3 is viewed by us as an exemplar for positive collaboration between the planning and economic processes of which you have been a longstanding advocate.

Yours sincerely,


Jackie Maguire,
Chief Executive

APPENDIX D

**LETTERS FROM DEPARTMENT OF
ENVIRONMENT, COMMUNITY AND
LOCAL GOVERNMENT**

OF

27TH JANUARY 2016

AND

19TH APRIL 2016.

Louise Heeney (Hand)

1118



From: Eoin Bennis - (DECLG) [Eoin.Bennis@environ.ie]
Sent: 27 January 2016 15:18
To: variation3mcdp
Cc: Ciara Gilgunn - (DECLG)
Subject: DECLG obs on - Draft Variation No. 3 to the Meath County Development Plan 2013-2019.
Attachments: Letter to LA 27 Jan 2016.pdf; ATT00001.txt; ATT00002.htm

Good afternoon

Attached please find comments from the Minister for the Environment, Community and Local Government on the **Draft Variation No. 3 to the Meath County Development Plan 2013-2019.**

Please acknowledge receipt of this email.

Thanking you,

Eoin Bennis
DECLG



Comhshaoi, Pobal agus Rialtas Áitiúil
Environment, Community and Local Government



27 January, 2016.

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

Re: Draft Variation No. 3 to the Meath County Development Plan 2013-2019

A Chara,

I am directed by the Minister for the Environment, Community and Local Government to refer to your recent letter in relation to the above and set out hereunder observations on behalf of the Minister.

The Department notes the content of the Draft Variation to the Meath County Development Plan 2014-2022, which are primarily intended to align the Meath County Development Plan with recommendations made in the Economic Development Strategy for County Meath 2014-22 (December 2014).

The Department welcomes the extensive background work completed by Meath County Council in the area of economic and enterprise development and the approach of the Council in seeking increased employment opportunities and enterprise development in the county in a targeted and strategic manner.

However, before the Draft Variation is finalised, the Department is of the view that a number of aspects to the variation should be amended to ensure that it sits properly alongside the requirements of statutory planning guidelines and planning legislation and requests that the Planning Authority makes those amendments called for as set out below.

Phasing of Employment Development

Phasing objectives in relation to employment zonings are currently included in the Meath County Development Plan 2013 – 2019 and this phasing arrangement provided for the release over time of identified employment lands under the core strategy.

This approach now appears to be proposed for removal as 'Phase II' employment lands in 16 settlements are to be included for development within the current plan period.

While some of these settlements require some additional amounts of additional employment lands, the evidence base to support such a broad removal of phasing arrangements is not clearly demonstrated in the proposal. This removal of phasing results in a significant increase in the quantum of zoned employment lands included in the current plan period.

Accordingly, it is recommended by the Department that prior to the final consideration of the Draft Variation that the Council reconsiders each of the settlements concerned with regard to the anticipated demand and evidence for additional employment zoning. This would better inform the proposed scope and scale of the re-consideration of the 'Phase II' mechanism in the Draft Variation and ensure sufficient employment lands are reserved for phase's post 2019.

Strategic Employment lands

The Draft Variation includes the zoning of additional employment lands north east of the M3 motorway at Clonee/Portan. These lands are situated between the existing Bracetown Business Park and zoned employment lands at Portan adjoining the Fingal County boundary where there is a substantial tract of lands being developed as an international data centre/infrastructure facility. It is stated (section 3.5/3.6) that these lands are to be zoned to facilitate further FDI investments on foot of this significant Facebook development under construction at Portan.

The Clonee/Portan area is considered to be a strategic location on the M3 and it is noted that the lands are to be zoned with a combined Objective E2/E3 zoning which permits a wide range of general employment uses – including Go Kart track, Furniture Showroom, Recycling Facilities, Fuel Depot, Garden Centre, etc.

The type of development potentially permitted therefore includes uses that could be detrimental to the important FDI investment intended for the location. The Objective E2/E3 zoning and local zoning objective (CEROBJ3), as currently worded may therefore not be sufficiently targeted to ensure use of these lands as a location for FDI/significant employment development with particular and extensive land requirements.

The Department requests that the Planning Authority includes additional policy safeguards in the form of further objectives to ensure that these lands are designated solely for the development of major employment proposals requiring a significant site area and responding to the advantages of clustering such important employment development in the Clonee/Portan area.

Changes to Zoning Objectives – Permitted Uses

The Draft Variation includes proposed changes to the 'Permitted Uses' and 'Open for Consideration Uses' specified for different zoning objectives.

Such detail in the Meath County Development Plan is very important to ensure the congregation of compatible uses within a particular zoning and to ensure that permitted development is consistent within the overall zoning objective. The introduction of additional 'Permitted Uses' and 'Open for Consideration Uses' types of development into the B2 and D1 zoning categories and in particular the E1, E2 and E3 serve to dilute the overall zoning objectives concerned and the types of development considered appropriate within the zonings.

For instance, the E1 'Strategic Employment Zones (High Technology Uses)' zoning objective seeks to 'To facilitate opportunities for high end technology/ manufacturing and major campus style office based employment with high quality and accessible locations'. However, the Draft Variation proposes to introduce 'Leisure Facilities', 'Industry- Light', 'Industry – General', 'Petrol Station', 'Transport Depot/Logistics' and 'Warehousing' into this zoning as 'Open for Consideration Uses'.

The Department is of the opinion that these uses are not consistent with the E1 zoning objective and are already 'Permitted Uses' or 'Open for Consideration Uses' in Zoning E2 'General Enterprise & Employment'. The proposal therefore serves to blur the distinction between the zonings and the nature of intended employment therein. The

result is an excessive overlap between E1/E2/E3 employment zonings which is not the approach taken in the Meath County Development Plan.

Under the current Meath County Development Plan, lands within the Objective 'White Lands' zoning are generally not to be developed within the plan period but are instead to be reserved for future strategic expansion of an urban area. However, the draft Variation (p.43) seeks to amend the strategic Objective WL 'White Lands' zoning objective to allow for development related to the implementation of the Economic Strategy. The range of development that might be considered to come under this caveat is too wide and it would therefore be of benefit to include some specific policy criteria or exceptional circumstances to clarify when development in this strategic reserve may be appropriate.

The Department requests that the Planning Authority re-examines the proposed changes in the Draft Variation in this regard and avoid the move to the use of vague, non-specific or overly general zoning designations that reduce clarity and certainty for developers and the wider public alike.

New Housing & Employment Lands at Dunboyne

The proposed Variation includes zoning and policy changes to provide for the creation of new residential and employment development possibilities adjoining and to the west of Junction 5 on the M3 motorway.

This aspect to the Draft Variation seeks to relocate 500 housing units from the County Development Plan Core Strategy to this location and to facilitate a 'developer led masterplan' (per proposed objective Dunboyne North OBJ1) for future development.

Dunboyne is designated as a Large Growth Town II in the Regional Planning Guidelines for the Greater Dublin Area 2010-22 where population for such settlements is to be developed to 15,000-30,000 range. Dunboyne's population at the 2011 Census was recorded at 6959 persons and the settlement therefore would have to grow significantly to achieve the Large Growth Town II population target.

The core strategy of the Meath County Development Plan 2013-19 (Table 2.4) provides for a population increase of 1494 (+ 21% increase) in Dunboyne accommodated in zoned housing lands (33+ hectares) including a significant land parcel at the eastern side of the settlement at Dunboyne train station. Additional future Phase II housing lands (ie.

to be developed post 2019) are located at the southern boundary of the settlement. This adopted growth strategy for Dunboyne extends the town spatially eastwards proximate to the public transport hub at the train station in a rational and sustainable fashion.

The Department is firmly of the view that as regards this specific aspect of the Draft Variation, it would create a new residential development, detached and distant from the existing urban area of Dunboyne and crucially disconnected from the local social, community, educational, leisure and other services that the new population/residents would require.

While Dunboyne is earmarked in the RPGs for future housing, it is considered that development should develop in an orderly and planned manner, extending out from the established urban area and primarily to the east and south.

The proposed new residential zoning/development significantly to the north of the established town at Pace (1.5-2km away) would be a clear breach of the sequential approach to the zoning of lands identified in section 4.19 of the Development Plan Guidelines and reiterated in Sections 2.3 & 6.2 of the Local Area Plan Guidelines, 2013.

The planning guidelines on Development Plans state that zoning should 'extend out from the centre of an urban area, with undeveloped lands closest to the core and public transport routes being given preference (i.e. 'leapfrogging' to more remote areas should be avoided)' (section 4.19).

By contrast, the proposed zoning would create an isolated development, physically remote from the established settlement and contrary to the adopted County Development Plan core strategy for Dunboyne whereby new housing is to be constructed to the east and subsequently to the south of the town.

It is also noted by the Department that Dunboyne has a population of in excess of 5,000 persons and therefore is required to have a Local Area Plan prepared for it under section 19(b) of the Planning & Development Act 2000 (as amended). For future reference, a new statutory local area plan for Dunboyne/Clonee is considered the most appropriate planning mechanism to guide the development of the area.

In addition, the Variation proposes housing and employment zonings at Pace that is positioned either side of the R157 and is in proximity to Junction 5 on the M3 motorway.

The planning guidelines on Spatial Planning and National Roads (2012) under section 2.7 emphasise that there must be an evidence base to development proposed in the vicinity of motorway interchanges and a traffic assessment to ensure the avoidance any adverse impact on the national road infrastructure must be provided to this end. Such proposals must demonstrate, inter alia, consistency with the relevant development policy/strategy including the National Spatial Strategy and Regional Planning Guidelines. The Department notes with some concern that the Draft Variation is not accompanied by a traffic impact assessment or similar evidence basis to determine that there will be no adverse impact on the operation of the adjoining motorway infrastructure.

Therefore the Department believes that the approach required by the Spatial Planning and National Roads Guidelines has not been followed in this Draft Variation and the zoning has the potential to generate traffic volumes to limit the operation of the nearby motorway interchange.

In summary, the proposed creation of a new employment and residential development at Pace would appear to be significantly at variance with the requirements of the Development Plans Guidelines, the Local Area Plan Guidelines and the Spatial Planning and National Roads Guidelines, in addition to being a departure from the settlement and core strategy of the Meath County Development Plan.

In summary, while the Department supports the general aims of the Planning Authority to grow and develop the economic base of a county, which has seen significant commuter type housing development in recent years without a commensurate expansion of employment, the Planning Authority must address three key areas to ensure that the Draft Variation is consistent with relevant national and regional policies, namely that:

- (1) Ensure the Clonee/Portan lands are suitably structured and regulated to focus on large footprint FDI type projects;
- (2) Revisit the use zoning objectives (including Phase II lands) to avoid a drift towards non-economic development/enterprise uses emerging in areas ostensibly to be prioritised for such activities; and
- (3) Remove the residential content/intent of the Draft Variation North of Pace and ensure that proper traffic and transport appraisal of all development policies is finalised to the satisfaction of Transport Infrastructure Ireland, before adopting the Draft Variation.

The steps above are critical in ensuring that the adopted Variation is not in breach of statutory requirements under the Planning Act that the Minister is determined to uphold under his powers.

The officials of the Department are available to discuss any technical aspects of the above with colleagues in Meath County Council and in the first instance you are advised to contact Mr. Stewart Logan, Planning Adviser on 01-8882419.

Is mise le meas,



Niall Cussen

Principal Adviser

Forward Planning Section

Louise Heeney (Hand)

From: Ciara Gilgunn - (DECLG) [Ciara.Gilgunn@environ.ie]
Sent: 19 April 2016 16:08
To: variation3mcdp
Cc: Eoin Bennis - (DECLG); Ruth Murray; Stewart Logan - (DECLG); Colin Ryan - (DECLG)
Subject: DECLG obs Material Alterations to the Draft Variation No. 3 to the Meath County Development Plan 2013-2019.
Attachments: DECLG Obs to LA 19 April 2016 Final.pdf; ATT00001.txt

Good afternoon

Attached please find comments from the Minister for the Environment, Community and Local Government on the Material Alterations to the Draft Variation No. 3 to the Meath County Development Plan 2013-2019.

Please acknowledge receipt of this email.

Thanking you,

Ciara Gilgunn
Forward Planning Section

Water and Planning Division | DECLG | Custom House | Dublin 1 | +353 (0) 1 8882418



Seirbhís ar scoth an domhain a chur ar fáil don Stát agus do mhuintir na hÉireann.



Comhshaol, Pobal agus Rialtas Áitiúil
Environment, Community and Local Government

1008



19 April, 2016.

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

**Re: Proposed Material Alterations to the Draft Variation No. 3 of the
Meath County Development Plan 2013-2019**

A Chara,

I am directed by the Minister for the Environment, Community and Local Government to refer to your recent letter in relation to the above and set out hereunder observations on behalf of the Minister.

The Department welcomes the fact that certain comments made in the Department's submission to the Council dated 27th January 2016 have been acknowledged and addressed in the Proposed Amendments to Variation No.3 to the Meath County Development Plan 2013-2019.

The Department fully understands the importance of ensuring appropriate economic development in County Meath and that the county plays its full part in addressing the shortage of housing in the greater Dublin area.

Notwithstanding the above, the material alterations to the proposed variation do not appear to have fully addressed the Department's submission and therefore requests the planning authority to again examine and address the issues below in finalising the variation.

The Department's previous submission of 27th January 2016 identified issues regarding the fit between the location of the proposed residential and employment development at Pace north of Dunboyne with the relevant statutory s.28 planning guidance – Local Area Plan Guidelines, Spatial Planning & National Roads Guidelines and the Development Plans Guidelines.

Accordingly, Meath County Council was requested to reconsider the residential content of the variation at this location having regard to the optimal location for such development in and around Dunboyne and options for same already provided for under the development plan and to ensure the proper traffic assessment of the employment development proposal in consultation with Transport Infrastructure Ireland.

The proposed material alterations do not appear to have addressed these issues.

The Chief Executives Report refers to Dunboyne's population and employment growth potential as a Large Growth Town II under the Regional Planning Guidelines for the Greater Dublin Area 2010-2022 as a justification for additional residential development in the form of a 'live/work community' at Pace close to the M3 interchange.

However, the Department is firmly of the view that the planned growth of Dunboyne is already provided for under the Meath County Development Plan 2013-19 Core Strategy which designates the development of 33 hectares of new housing lands over the plan period with additional post-2019 residential lands also identified on the southern side of the town. This approach to the orderly development of Dunboyne will integrate new development into the existing town and have new residents in close proximity to the required educational, retail, leisure, transport and other local services.

Accordingly, the existing development plan residential zoning objectives are considered by the Department to be rational, sequential and in accordance with the Development Plans Guidelines and the Local Area Plans Guidelines and if the Council wished to provide for more residential development potential in Dunboyne to address the residential needs arising from recent and welcome employment investment in the area, there are options to zone additional lands in Dunboyne, primarily to the south of the town. Furthermore, given the existing bank of zoned lands in the town that are not being developed, strategies should be deployed to work with the owners of these lands to activate them for development rather than promoting the development of less optimal locations from a broader sustainable communities perspective.

It is also noted that Dunboyne is identified under the Retail Strategy for the GDA 2008-16 as a Level 3 retail centre with the designation including a footnote that '*Dunboyne will gradually develop over the next 20 years towards level 2 status*'. On foot of this designation, the Dunboyne/Clonee/Pace LAP 2009 (Objective RET OBJ1) provided for the development of a new Level 2 retail centre at Pace. However, no development has occurred at this location since the designation and the subject lands remain undeveloped and greenfield in nature.

The Department understands that the Retail Strategy for the GDA 2008-16 is to be reviewed by the Eastern and Midland Regional Assembly in the context of its preparation of a Regional Spatial and Economic Strategy (RSES) as the successor to the Regional Planning Guidelines for the Greater Dublin Area 210-2022.

This imminent strategy review will formally be adopted as policy for the region informing the development plan process for the county/city authorities in the region. The mechanism could potentially review the long term Level 2 retail designation at Dunboyne in light of its viability given its proximity to the established Level 2 Blanchardstown Centre in Fingal.

In the proposals at Pace contained in this variation, the long-term regional retail development designation at Pace has therefore been translated into separate isolated residential (Objective A2) and employment (E2/E3) zonings. As outlined in the Departments submission previously on the variation, these would not appear to be fully consistent with the required section 28 Guidelines, namely:

- The residential zoning proposal departs from the sequential approach to new housing development in the Development Plans Guidelines and the Local Area Plans Guidelines; and
- The employment zoning proposal adjoins junction 5 on the M3 motorway does not appear to have been based on the required transport assessment approach to such proposals as specified in the Spatial Planning and National Roads Guidelines.

It is noted from correspondence received by the Department from the Chief Executive, Meath County Council on 13th April 2016 that there is a study by Aecom Transport consultants into the M3 junctions/interchanges in conjunction with Meath County Council, Fingal County Council and TII. This research however is currently ongoing and without

its findings/recommendations being available, it would be premature to finalise this variation.

Accordingly, the Department considers that the proposed 'A2' residential and 'E2/E3' employment zonings at Pace, north of Dunboyne are not fully consistent with the Section 28 Ministerial Guidelines identified above and that until a full analysis is carried out on the transport issues in particular, the best course of action would be to omit the zoning objectives pending a broader review of strategic development options for this area, including strategies to activate the development of existing residentially zoned areas.

The officials of the Department are available to discuss any technical aspects of the above with colleagues in Meath County Council and in the first instance you are advised to contact Mr. Stewart Logan, Planning Adviser on 01-8882419.

Is mise le meas,



Niall Cussen

Principal Adviser

Forward Planning Section

Appendix E

Senior Counsel Opinion,

Meeting Minute of Meath County

Council 23rd May 2016,

Presentation to Meath County Council

23rd May 2016.

From: Michael Griffin
Sent: 06 May 2016 15:09
To: 'stewart.logan@environ.ie'
Cc: Kevin Stewart
Subject: PL-FWD - Variation no 3 Meath County Development Plan

Mr Logan

My name is Michael Griffin, I'm the Senior Executive Officer in the planning department of Meath Co Council .

My colleague Kevin Stewart Director of Planning Services, has been trying to reach you by phone on a number of occasions today. Unfortunately Mr Stewart is unavailable this afternoon and he has asked me to copy you with legal opinion obtained by Meath Co Council in the context of its dealings with a number of submissions to the material alterations stage of the variation .

The Departments letter of 19th April is one such submission.

The Council will be available to discuss this matter as required.

Michael Griffin
SEO
Planning



variation no 3 to
meath co dev plan 20

OPINION

VARIATION NUMBER 3 TO MEATH COUNTY DEVELOPMENT PLAN 2013-2019

Agent has asked me to advise the Council in relation to Variation number 3 to the Meath County Development Plan 2013-2019 which is presently being considered by the elected members.

The background:

In accordance with Section 13 of the Planning and Development Act, 2000 the Council proposed a variation to the Development Plan 2013-2019. The proposed variation was published and written submissions or observations were invited and same were received including written submissions from the Minister for the Environment. In the Minister's submission, dated 27th January 2016, a number of issues were raised in relation to the draft Variation, but in particular, the Council were asked to address the proposed A2 residential and E2 employment zonings at Pace, North of Dunboyne.

Although the submission referred to both the new employment and residential development at Pace, the summary at the end of the submission, at page 6, only requested the removal of the residential content, north of Pace. The Council were asked to revisit the new zoning objectives and to ensure that the Clonee-Portan lands were suitably structured and regulated to focus on large footprint FDI-type projects.

In accordance with the Act, the Chief Executive prepared a report in respect of the proposed draft, the submissions and observations received and set out the Council's response in respect of same. The Chief Executive recommended to the members that the variation be adopted subject to alterations which would address a number of the concerns of the department. The members considered the draft Variation, the submissions and observations received including the Minister's, the Chief Executive's report and its recommendations.

Following consideration of same, the members adopted the Variation subject to proposed alterations. As recommended by the Chief Executive, they did not propose alterations to the zoning A2, E2, at Pace north of Dunboyne.

As the alterations were deemed to be material, they then went on public display seeking further written submissions or observations thereon. By letter dated 13th April, 2016 the Chief Executive wrote to the Minister setting out the Council's response to the Department's submission of 27th January 2016 and giving a detailed and reasoned explanation as to the proposed alterations to the variation. The Minister made a further submission dated 19th April, 2016.

The Minister reaffirmed his view in relation to the zoning at Pace, north of Dunboyne. At page 4 of the submission, it recommended:

"The best course of action would be to omit the zoning objectives pending a broader review of strategic development options for this area, including strategies to activate the development of existing residentially zoned areas".

It is to be noted that in contrast to the earlier submission, where only the residential zoning was sought to be omitted, this further submission now sought both zonings in relation to employment and residential, to be omitted.

The question which arises is as to whether the elected members, in considering the material alterations, can accede to the recommendation of the Minister as set out in the letter of the 19th April, 2016.

Section 13 and the procedure thereunder:

Where a proposal is made by a Local Authority to vary its Development Plan, a number of steps must be taken in accordance with the provisions of Section 13.

- (a) The draft Variation must be put on public display and notice thereof published in a newspaper. Written submissions or observations may be made. In addition, the Minister, the Minister for Arts, Heritage and the Gaeltacht, and An Bord Pleanála must be given notice of the proposed Variation. (Section 13 (2)).
- (b) On receipt of the written submissions or observations the Chief Executive must then prepare a report and summarise the submissions and observations, the issues raised by the Minister and issues raised by other bodies or persons and give a response thereto. The Chief Executive also makes recommendations in the report to the elected members. (Section 13 (4)).
- (c) The report then comes before the members and they are obliged to consider the proposed Variation and the report of the Manager which will include the submissions and observations. (Section 13 (5)).

Having considered same, the members have three options:

- (i) To make or adopt the Variation;
 - (ii) To reject the Variation;
 - (iii) To make or adopt the Variation but subject to alteration. (Section 13 (6)).
- (d) Having decided to make the alterations, they must decide then whether the alterations are material, and if so, then they must go on public display inviting further submissions or observations. Having received those further submissions or observations, the members must then decide whether to adopt the alterations. (Section 13 (6)).
 - (e) The members are not entitled to make any further modification to the material alterations, unless they are minor in nature and unlikely to have significant effects on the environment or where it would lead to an increase in the area of land zoned for any purpose or would lead to an addition to or a deletion from the record of protected structures. (Section 13 (6) (c)).

Applying the facts to the above Statutory Scheme:

Following receipt of the initial submissions and observations, the Chief Executive had made a report to the members including observations and recommendations relating to the submission received from the Minister. The members considered that report in

accordance with Section 13 (5) of the Act. In accordance with Section 13 (6) of the Act, the members decided to make the variation (or adopt same) but with alterations.

Those alterations took account of a number of the concerns raised by the Minister. In relation to the concern raised by the Minister regarding the zoning of lands at Pace, North of Dunboyne, the members resolved not to alter the variation and therefore the variation as adopted included those zonings, as per the initial draft variation. This was the decision under Section 13 (6).

The alterations proposed by the members were deemed to be material and put on public display.

The Minister then made further observations by letter of 19th April, 2016.

Whereas the Minister in his original submission had recommended the removal of the residential zoning, from Pace, North of Dunboyne, in the second submission, he now recommended the removal of both zonings relating to residential and employment at Pace, North of Dunboyne.

It is my opinion that the recommendation of the Minister dated 19th April, 2016 should not be adopted by the members because to do so would be directly in breach of the Act. I say this for the following reasons:

- (a) The only matters which the members can consider following the adoption of the variation subject to alterations is the material alterations. This is confirmed by the provisions of Section 13 (6) (ad) (ii). It provides:

"That written submissions or observations with respect to the proposed material alteration or an assessment referred to in paragraph (aa) and made to the Planning Authority within a stated period shall be taken into account by the Authority before the variation of the Development Plan is made".

[Underlined for emphasis]

The remainder of the variation as adopted under Section 13 (6) has been adopted and is not open to further consideration. The only matter which is now open for consideration is the material alterations. The submission of the Minister is directed entirely towards matters which are not the subject of the material alterations. It is therefore impermissible for the members to consider those observations and further it is impermissible to follow the recommendation therein.

- (b) The submission of the Minister dated 19th April 2016 is in effect recommending the members to revisit the decision already made under Section 13 (6) (a). They have already adopted the variation including the zoning at Pace, North of Dunboyne. They are not permitted under the Act to revisit that decision. The only matter which they can consider is the material alterations. The Minister in effect is asking the members to go back to the position that existed prior to the draft going on public display. Furthermore, they are being asked by the Minister to consider matters which were not a matter of public notification, in that they were not material alterations, and therefore, members of the public and in particular affected landowners, would have had no opportunity to make submissions or observations thereon. If the members revisited their decision under 13 (6) (a) and removed the zonings at Pace, North of Dunboyne, this would leave the Council open to the possibility

of Judicial Review of that decision, and a possible claim for compensation\damages, by affected landowners.

- (c) Further, if the recommendation of the Minister was to be regarded as a submission on the material alterations (and for the reasons set out above at (a) they are not in fact so), as those proposals require a deletion of zoning, they are clearly material. It is not possible at this stage in the process to make a material modification to the material alterations which have gone on public display. The only modification which may be made is a modification which is minor in nature.

This is clearly set out at Section 13 (6) (c) which says:

“A further modification to the variation –

- (i) May be made where it is minor in nature and therefore not likely to have significant effects on the environment or adversely affect the integrity of a European site,*
- (ii) Shall not be made where it refers to –
An increase in the area of land zoned for any purpose or
An addition to or deletion from the record of protected structures”*

Therefore, it is not permissible to make a material modification to a material alteration.

What the Minister is proposing is clearly material and would have serious consequences for landowners in the area. It is not minor in nature.

Conclusion:

At the point in the process where the members have put material alterations out for public display, it is not permissible for the members to consider anything other than the material alterations and any submissions or observations thereon. The submission of the Minister relates to matters which are not the subject of the material alterations. In addition thereto, even if they could be considered, they are not permissible in law because they are themselves material modifications, and material modifications cannot be made to material alterations.

The matters, the subject of the Minister’s submission were not put on public display and therefore affected landowners would never have had the opportunity to make submissions or observations thereon.

For all these reasons, it is my opinion that the Council would be acting in breach of the Act if they consider the observations of the Minister of the 19th April, 2016. If they do so, and adopt either or both of the recommendations of the Minister, they are open to being Judicially Reviewed and that Judicial Review is very likely to succeed.

Nothing further occurs.

Dated this 5th day of May, 2016.

Signed: Patrick A. Butler.



Miontuairiscí / Meeting Minutes

Special Meeting

23rd May, 2016 Council Chamber

Presiding:

Cathaoirleach, Councillor Brian Fitzgerald

Councillors Present:

Councillors, Joe Bonner, Sinéad Burke, Eugene Cassidy, Francis Deane, Padraig Fitzsimons, Enda Flynn, Wayne Forde, Joe Fox, Noel French, David Gilroy, Jim Holloway, Tom Kelly, Sharon Keogan, Nick Killian, Caroline Lynch, Ronan McKenna, Paddy Meade, Maria Murphy, Gerry O'Connor, Claire O' Driscoll, Maria O' Kane, Damien O' Reilly, Joe Reilly, Sarah Reilly, Tommy Reilly, Alan Tobin, Gillian Toole.

Apologies: Councillors, Seán Drew, Eimear Ferguson, Michael Gallagher, Trevor Golden, Johnny Guirke, Wayne Harding, Suzanne Jamal, Stephen McKee, Darren O' Rourke, Bryan Reilly, Seán Smith, Sharon Tolan.

Officials in attendance:

Chief Executive: Jackie Maguire

Directors of Service: Kevin Stewart, Des Foley, Barry Lynch

Meetings' Administrator: Olive Falsey

- 1 To consider the proposed variation and the Chief Executive's report on submissions received in respect of material alterations to variation No 3 of the Meath County Development Plan 2013-2019 and if thought fit to resolve to make the variation with or without further modification or refuse to make the variation, pursuant to Section 13 of the Planning & Development Acts 2000-2015.

The Cathaoirleach, Councillor Brian Fitzgerald opened the meeting and explained the agenda item that was being put before the Council for consideration.

He called on Kevin Stewart, Director of Services, who provided a summary of the process to date and noted that the Council had received a number of submissions on the Variation which were considered at the February meeting of the full Council. Following the consideration at the February meeting, some material changes went on public display, the period of which ended on the 19th April. It was noted that, as a result of the public display of the material amendments, further submissions were received including a submission from the DoECLG, TII and NTA with regard to the to live work community at Dunboyne North.



Miontuairiscí / Meeting Minutes

Changes to the proposed policy on the live/work community at North Dunboyne were not the subject of the proposed material amendments. It was decided to seek legal advice to confirm what can be considered at this stage of the process. The legal advice sets out that, at this stage of the process, the Council can only consider the Chief Executive's Report on material amendments. The Council cannot revisit what was decided at an earlier stage in the process. Changes of a minor nature can only be made, as there can be no further consultation at this point in the process.

Wendy Bagnal, Senior Executive Planner, made the presentation and informed that 9 submissions were received following the display of the material amendments as follows:

Department of Environment, Community and Local Government – No 1008

- 'Live work 'community at Dunboyne North (Pace)
- Planned growth of Dunboyne
- Importance of working with the owners of lands in the area.

Chief Executive's Response:

- The proposed 'live work 'community at Dunboyne North is not the subject of the material alterations.
- The Legal Advice obtained by the Council states that it is not open to the Elected Members to consider this submission.

National Transport Authority– No 1009

- 'live work 'community at Dunboyne North;
- phasing objectives as contained in the current plan;
- use of developer led master plans';
- amending car parking requirements;
- zoning of lands at Clonee/Portan;
- Text of the plan referring to white land.



Miontuairiscí / Meeting Minutes

Chief Executive's Response:

- The proposed 'live work 'community at Dunboyne North is not the subject of the material alterations;
- Variation accords with Section 7.1.2 of the NTA Transport Strategy for the GDA which refers to integrating land use and transport.

Transport Infrastructure Ireland –No 1004

- Live work 'community at Dunboyne North (Pace);
- Critical importance of attracting investment and employment opportunities to County Meath;
- Zoning of lands at Clonee/Portan;
- Spot objective for FDI relating to the Clonee/Portan lands.

Chief Executive's Response:

- The proposed 'live work 'community at Dunboyne North is not the subject of the material alterations;
- Variation accords with Section 7.1.2 of the NTA Transport Strategy for the GDA which refers to integrating land use and transport.

AN TAISCE– No 1002

- Submission refers to Maynooth Environs, specifically the Carton lands

Chief Executive's Response:

Above matter not the subject of Amendments.

EPA– No 1003

- Ensure that zoning/development proposals remain consistent with RPGs and the RSES's;

Chief Executive's Response:

No change required

Department of Education and Skills- No 1007

- Requests that provision should be made for a primary school site of approximately 0.77 hectares in Dunboyne

Chief Executive's Response:

Above matter not the subject of amendments



Miontuairiscí / Meeting Minutes

Fiona O'Brien – No 1001

- Submission objects to the proposal to turn Stamullen into a moderate town

Chief Executive's Response:

No change required

Hugh Mc Ginn, Brady Hughes Consulting – No 1005

- Seeking amended wording of revisions to text on white land objective

Chief Executive's Response:

No change required

Deputy Thomas Byrne– No 1006

- The submission questions the legal status of the proposed material alterations

Chief Executive's Response:

- No change required

It was noted that further modification of a material alteration may be made where:

- it is minor in nature only with no likely significant impacts on environment or effect a European site;
- shall not be made where it increases in the area of land zoned for any purpose.

Following the presentation, Councillors had an opportunity for comment. While the majority of Councillors welcomed the Variation, there were concerns noted with regard to the proposals for Stamullen.

The Chief Executive summarised and noted that the Variation was aimed at incorporating the Council's Economic Strategy into the County Development Plan.

The Councillors unanimously resolved to make the variation without further modification on the proposal of Councillor Paddy Meade and seconded by Councillor Joe Fox.

This concluded the business of the meeting.

VARIATION NO 3

MEATH COUNTY DEVELOPMENT

PLAN, 2013-2019

Presentation to Meath County Council,

23rd May 2016

Wendy Bagnall, Planning Dept



comhairle chontae na mí
meath county council



SUMMARY OF CONTENT OF VARIATION

- Align the County Plan with the key tenets of the Economic Development Strategy as they relate to land use planning
- Revisions to the written text of Volume 1 of the MCDP in order to reflect the adoption of Variation No. 2.
- Identification of potential future changes to the settlement hierarchy within the County.



STATUTORY PROCESS TO DATE

- Draft on public display 21st December 2015- 27th January 2016
- 182 No Submissions received
- Chief Executive's Report on submissions circulated to Elected Members 23rd February 2016
- Elected Members resolved at their meeting of 7th March to materially alter the variation



STATUTORY PROCESS TO DATE

- Material alterations on public display 22nd March 2016- 19th April 2016
- 9 No Submissions received



comhairle chontae na mí
meath county council



FORMAT OF CHIEF EXECUTIVE'S REPORT

- list the persons or bodies who made submissions or observations;
- summarise firstly:
 - issues raised by the Minister, and
 - then issues raised by other bodies or persons;
- give the response of the Chief Executive to the issues raised, taking account of 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 for the time being of the Government or of any Minister of the Government.



BREAKDOWN OF SUBMISSIONS

Prescribed Bodies

- Department of Environment, Community, Local Government;
- National Transport Authority;
- Transport Infrastructure Ireland;
- An Taisce;
- EPA;
- Department of Education.

Other submissions

3 no.



comhairle chontae na mí
meath county council



Department of Environment, Community and Local Government – No 1008

- Welcomes that certain comments made in previous submission dated 27th January 2016 addressed.
- Acknowledges importance of economic development in Meath.
- Acknowledges importance of ensuring Meath plays its part in addressing the housing shortage within the Greater Dublin Area.



comhairle chontae na mí
meath county council



Department of Environment, Community and Local Government – No 1008

- ‘Live work ‘community at Dunboyne North (Pace)
- Planned growth of Dunboyne
- Importance of working with the owners of lands in the area.



DECLG - CE RESPONSE

- The proposed 'live work 'community at Dunboyne North is not the subject of the material alterations.
- The Legal Advice obtained by the Council states that it is not open to the Elected Members to consider this submission.



National Transport Authority– No 1009

- ‘live work ‘community at Dunboyne North;
- phasing objectives as contained in the current plan;
- use of developer led master plans’;
- amending car parking requirements;
- zoning of lands at Clonee/Portan;
- text of the plan referring to white land.



National Transport Authority– CE Response

- The proposed 'live work 'community at Dunboyne North is not the subject of the material alterations;
- Variation accords with Section 7.1.2 of the NTA Transport Strategy for the GDA which refers to integrating land use and transport.



Transport Infrastructure Ireland –No 1004

- Live work 'community at Dunboyne North (Pace);
- Critical importance of attracting investment and employment opportunities to County Meath;
- Zoning of lands at Clonee/Portan;
- Spot objective for FDI relating to the Clonee/Portan lands.



Transport Infrastructure Ireland –CE Response

- The proposed 'live work' community at Dunboyne North is not the subject of the material alterations;
- Variation accords with Section 7.1.2 of the NTA Transport Strategy for the GDA which refers to integrating land use and transport.



AN TAISCE-- No 1002

- Submission refers to Maynooth Environs, specifically the Carton lands

CE Response

Above matter not the subject of Amendments.



EPA-- No 1003

- Ensure that zoning/development proposals remain consistent with RPGs and the RSES's;
- Requirements of the Habitats Directive should be taken into account.

CE Response

No change required



Department of Education and Skills- No 1007

- Requests that provision should be made for a primary school site of approximately 0.77 hectares in Dunboyne

CE Response

Above matter not the subject of amendments



comhairle chontae na mí
meath county council



Fiona O'Brien – No 1001

- Submission objects to the proposal to turn Stamullen into a moderate town

CE Response

No change required



comhairle chontae na mí
meath county council



Hugh Mc Ginn, Brady Hughes Consulting – No 1005

- Seeking amended wording of revisions to text on white land objective

CE Response

No change required



Deputy Thomas Byrne– No 1006

- **The submission questions the legal status of the proposed material alterations**

CE Response

- **No change required**



NEXT STEPS

- Elected Members will consider the proposed variation and the Chief Executive's report on submissions received in respect of material alterations and If thought fit to resolve to make the variation with or without further modification or refuse to make the variation.

Further modification of a material alteration may be made where:

- it is minor in nature only with no likely significant impacts on environment or effect a European site;
- shall not be made where it increases in the area of land zoned for any purpose.



NEXT STEPS

In making the variation, the Members shall be restricted to considering:

- 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 any Ministers of the Government.



comhairle chontae na mí
meath county council



APPENDIX F

**LETTER FROM MEATH COUNTY COUNCIL
CHIEF EXECUTIVE TO NIALL CUSSEN,
PRINCIPAL PLANNING ADVISOR,
DEPARTMENT OF ENVIRONMENT,
COMMUNITY AND LOCAL GOVERNMENT
17TH JULY 2014, REGARDING MEATH
ECONOMIC DEVELOPMENT STRATEGY.**

Comhairle Chontae na Mí

Roinn Pleanáil,
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Forward Planning Section

Our Ref: FWD/ File 40

17th July 2014

Mr. Niall Cussen,
Chief Planning Advisor,
Department of Environment, Community & Local Government,
Custom House,
Dublin 1.

Re: Economic Development Strategy for County Meath

Dear Niall,

I would like to take this opportunity to update you on ongoing work regarding the preparation of an *Economic Development Strategy for County Meath*. As you may be aware Meath County Council has been working collaboratively with the DECLG since the commencement of this project. I would like to express our appreciation for the input that Bruce Mc Cormack, previous Department Inspector, has brought to the Technical Working Group. His contribution has been very beneficial and is viewed as an essential component in the successful delivery of this significant body of work.

As the national economic recovery begins to gather momentum, it is a timely opportunity to take stock of Meath's comparative advantages and to develop a policy platform that will help deliver sustainable economic growth. To this end, it is vital that Meath is facilitated to play a greater role in the future development of the National Gateway.

The '*Meath Economic Baseline Study*' which conveys the existing socio-economic profile of the county indicates that the county saw a rise of 13.1% in population but a fall of 5.2% in total employment between Census 2006 and Census 2011. The figure of 82% of the total workforce that were employed in 2011 has also to be seen against the backdrop of major commuting patterns, predominately from the east and south of the county. County Meath has effectively the highest rate of outbound commuting in the country which has largely negative implications for the quality of life of our communities. In effect an unsustainable pattern of development has been established in Meath which needs to be addressed as a national planning issue.

Set out in the attached summary is an overview of the project and progress to date. The report will also highlight the methodology and the anticipated outcome. I trust you will find this project both proactive and innovative. The strategy has anticipated current government policy and will have the wherewithal to deliver key targets outlined in national policy. This strategy synergises spatial planning with the delivery of primary economic objectives in the most efficient and appropriate way. We hope it will assist other local authorities, regional authorities and the private sector alike.

Please note that this letter should be read as a follow-on to the letter sent to Mr. Bruce Mc Cormack on the 15th March 2013 attached herewith. The latter requested the Department to consider awarding *Pilot Status for Best Practice* for the overall project.

I trust the Council's proposal will meet with your approval and Meath County Council looks forward to your response. Should you require additional clarification or information please do not hesitate to make contact with me.

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'J Maguire', written over a horizontal line.

Jackie Maguire
Chief Executive
Meath County Council

Summary of Economic Development Strategy for Meath

1. Background

There are 4 critical stages fundamental to the successful delivery of this project. These include;

1. Baseline Study
2. Economic Development Strategy for County Meath
 - Economic Action Plan
 - Spatial Implementation Plan
 - Marketing Plan
3. Integration of the Economic Strategy by variation of the County Development Plan, Local Area Plans, etc.

Meath County Council has completed Stage 1 of the process and initiated Stage 2.

1.1 Stage 1: Baseline Study NUIM

A baseline multi-factorial study setting out the economic profile of County Meath.

1.2 Stage 2: Economic Development Strategy for County Meath 2014-2022

Key steps within Stage 2 include:

- Appointment of multidisciplinary team of external consultants
- Development of Strategy in collaboration with the Economic Forum and the Technical Working Group
- Engagement and consultation with all relevant stakeholders
- Incorporation of the findings of the baseline study in addition to other appropriate material
- Compliance with national and regional government policy and facilitation of key target within same at local level
- Embedment of an implementation strategy to measure success

1.2.1 Current Stage (Stage 2)

Meath County Council has engaged the provision of expert consultancy services, to prepare a robust and resilient Economic Development Strategy for County Meath 2014-2022. The multi disciplinary team comprises *FTI Consulting, PMCA Economic Consulting and John Spain & Associates*.

The consultancy team has reviewed all relevant national, regional and local policy initiatives, integrated the NUIM baseline study into its work and has engaged with a large number of stakeholders both public and private. In particular, the consultancy team have proactively engaged with senior officials of Meath County Council, the Strategic Policy Committee for Planning and Economic Development and the Meath Economic Forum and have taken onboard their views in regard to key issues for the promotion of economic development and jobs in Meath.

1.2.2 Marketing Plan

The Marketing Plan seeks to clearly define and brand the unique attributes of County Meath as an attractive destination for business within a wider regional employment context.

The Marketing Plan will:

- Examine target audiences
- Promote County Meath as part of the National Gateway and Greater Dublin Region
- Advise on attracting investments and tailored approaches to new and existing industries

1.3 Stage 3: Integration of the Economic Strategy

Incorporate the Economic Strategy into the relevant suite of statutory plans in Meath County Council by means of the variation process.

1.4 Collaborative Approach

The Economic Strategy for Meath will demonstrably comprise a number of logical phases together with the proactive engagement of key stakeholders throughout the process. The collaborative approach includes the following;

Meath County Council; the body entrusted with the responsibility for the land-use plan-making process. The Meath County Development Plan 2013-2019 contains innovative and creative policies and objectives to build resilient new urban and rural communities while continuing to protect the unique heritage of the County.

Meath Economic Forum; a body set up by Meath County Council to promote the economic revitalisation and invigoration of County Meath. The Forum continues to play a key role in guiding the preparation of the Economic Development Strategy for the County. The membership comprises successful high achieving influencers with Meath connections or backgrounds, volunteering their own time to the future benefit of their county. Its role is to act as ambassadors and champions for economic development in Meath, both nationally and internationally. Unlike other Economic Forums established in various counties, this Forum's membership does not include officials from state agencies (with the exception of the Chief Executive of Meath County Council). The latter aids independence, transparency and minimises the risk of any perceived conflicts of interest.

Technical Working Group; comprising Senior Staff from the relevant Service Directorates in Meath County Council, together with national and regional guiders of process. The primary task of the group is to act in liaison with the Council and the Meath Economic Forum, and provide research capacity and technical guidance in the preparation of the Economic Development Strategy.

Throughout the process there has been close working co-ordination and collaboration between all parties concerned.

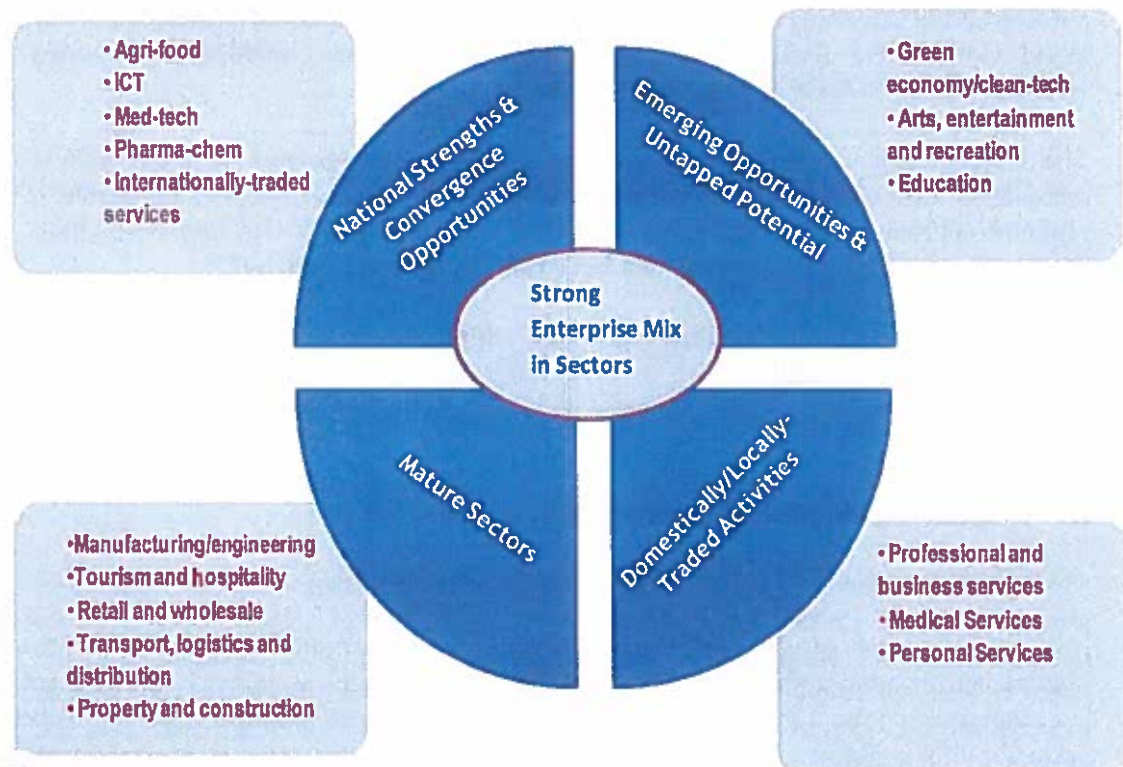
2. Core Components of the Economic Development Strategy

2.1 Executive Summary

This will give a clear distillation of the complete strategy in addition to key objectives and targets.

The graphic below summarises a typology of the categories of sectors to be promoted nationally in Ireland over the medium-term. The multi-disciplinary consultancy team has identified important sectors – like ICT (software), internationally-traded services and high-tech manufacturing – that can be successfully developed in Meath over the coming years, among both foreign and indigenous enterprises.

Meath Economic Vision 2022 – Inputs



2.2 Introduction

This will set out the main body of the strategy, stating its scope and purpose, together with approach and methodology.

2.3 Policy and Strategy Context

This section will include an outline of current key European, National, Regional and Local economic development and planning policies and strategies. It will also identify the particular features of Meath which warrant a bespoke economic development strategy aimed at sustainable employment generation in the county. This section will benefit from an outline of recent economic performance nationally and internationally, and the key trends in FDI and indigenous industrial development.

The Economic Development Strategy for County Meath 2014-2022 is cognisant of changing national policy, including the new regional assembly areas and the requirements placed on local authorities in respect of their LCDCs and LCDPs. This strategy is formulated to be capable of adjusting to meet the needs of the economic components of the LCDPs. There is direct interrelationship between the components making up the economic elements of the LECs (provided for under Section 44 of the Local Government Reform Act 2014), and the economic variables and metrics analysed and considered as part of this strategy.

The County-wide strategy is formed with a regional perspective in mind and is consistent with current Government economic policy. Such policy advocates a regional approach to economic development and the strategy will embrace same. Thus, in terms of spatial planning, two key priorities will be to the fore;

1. Ensure support for sectoral clustering within Meath and between Meath and the rest of its region.
2. Act upon identified sites for employment growth within the county.

2.4 Economic Profile of County Meath

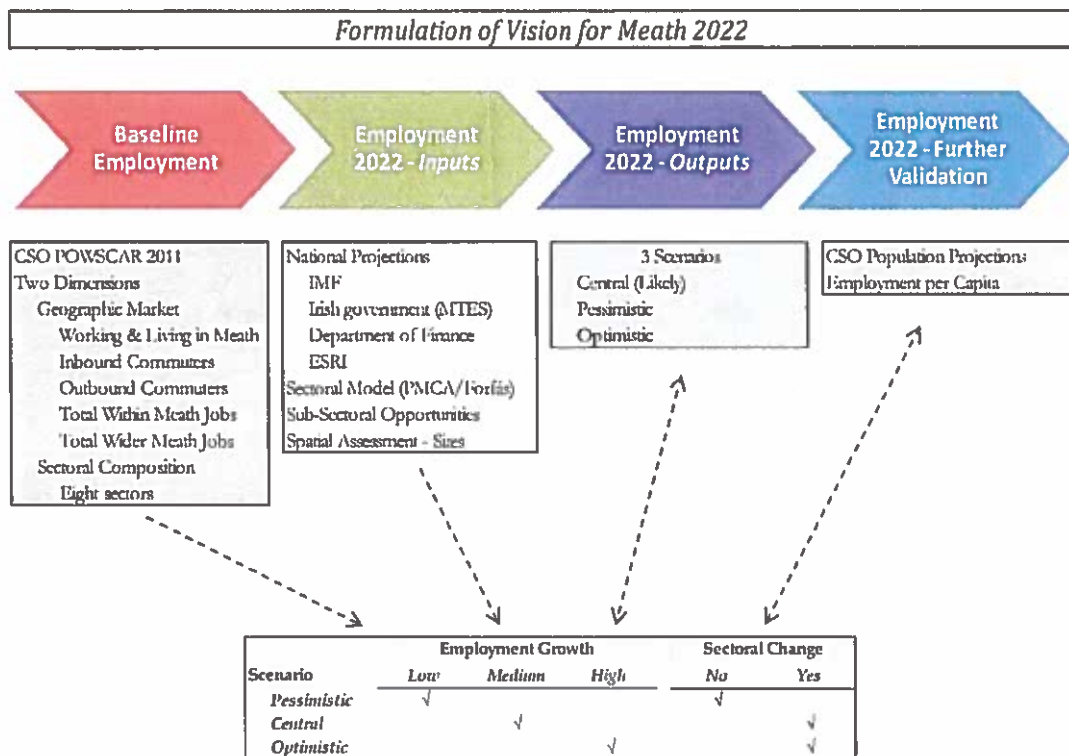
The Meath Economic Baseline Study commissioned by Meath County Council and produced by Dr. Chris Van Egeraat of the Department of Geography and Justin Gleeson of the All-Ireland Research Observatory (AIRO), NUI Maynooth, was the initial critical building block in this overall integrated model. It conveys the changes in economic activity in the county over the past 20 years plotting, inter alia, the growth in population, employment, infrastructure capacity, regional development, global economics, education, labour skills, research and development. A detailed audit of existing economic activity in the county is also outlined in the report.

Reference will also be made to other relevant studies which will provide the foundation for complementary analysis of data to achieve a clear and comprehensive analysis of the underperformance of the Meath economy. The latter will aid the development of potential future economic opportunities for County Meath.

A summary SWOT analysis and elaboration of same will also be included in this section.

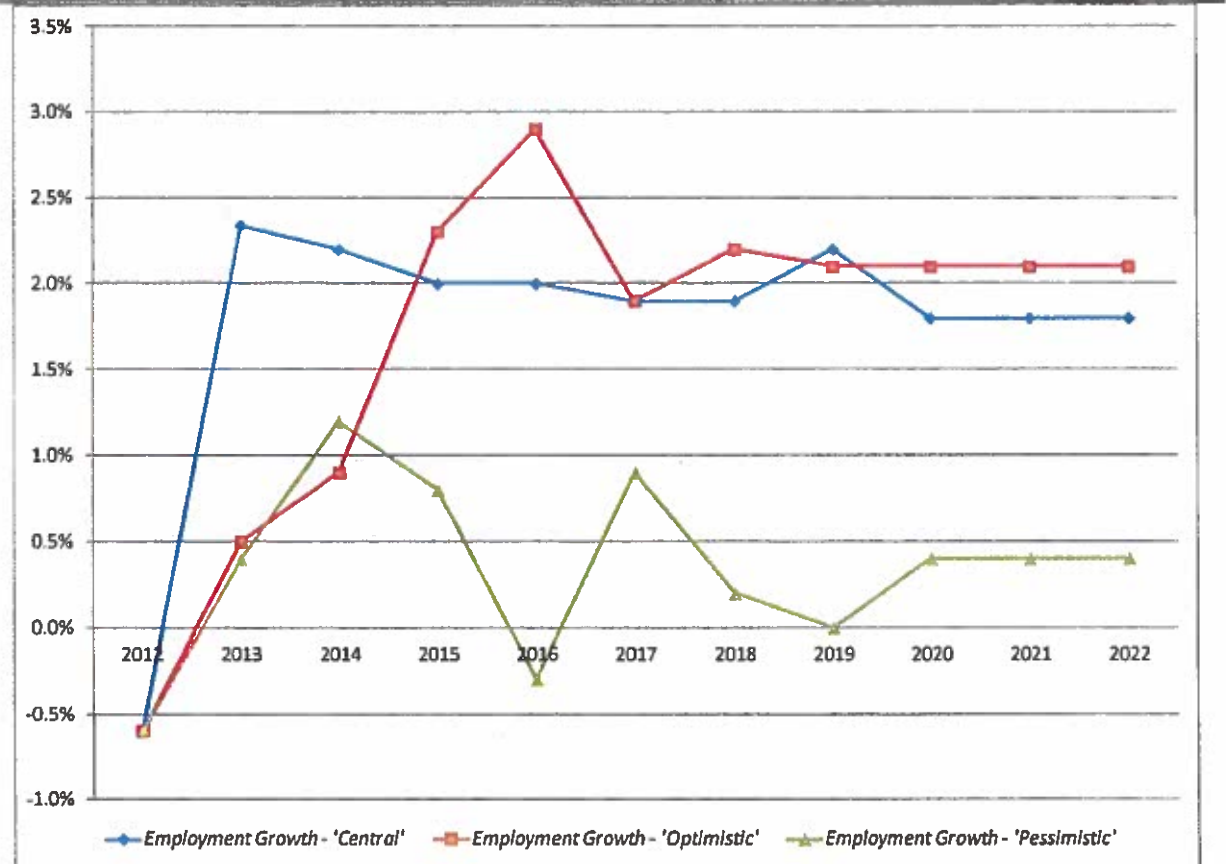
2.5 Vision for Meath

Meath Economic Vision 2022 – Formulation



Of particular interest to our subsequent formulation of the ‘Economic Vision’ for Meath 2022 are the employment growth projections (coupled with prospects for specific sub sectors in the Irish Economy). This will be conveyed by 3 components, namely; by sector, by spatial area and by scenario (central, pessimistic and optimistic). Overall this section of the strategy will identify the economic targets that can be achieved through the subsequent economic action plan which will be based on the growth projections for the Irish Economy as set out in the next graph.

Illustration of Employment Growth Projections for the Irish Economy (to be Used in the Formulation of the 'Economic Vision' for Meath 2022)



Source: IMF World Economic Outlook (WEO) April 2014; Irish government MTES Dec 2013; Department of Finance SPU April 2014; and ESRI MTR July 2013 ; consultancy team review.

2.6 Economic Action Plan

This element of the strategy will include an outline of informed targets, a set of recommendations and a clear assignment of roles and responsibilities.

National growth assumptions will be explicit in the strategy. The impact of these assumptions on the actions contained in the strategy and the likely outcomes of these actions (both positive and negative) will be clearly outlined. The strategy will consider the drivers that have mediated and that are likely to mediate between national trends and the economic and spatial development of the country. It will critically focus on delivering change to these drivers. Equally, the relevant external variables (both policy and macroeconomic) which are outside the control of Meath County Council will be listed, and reference made to what actions might be taken, in implementing the plan, to take account of these.

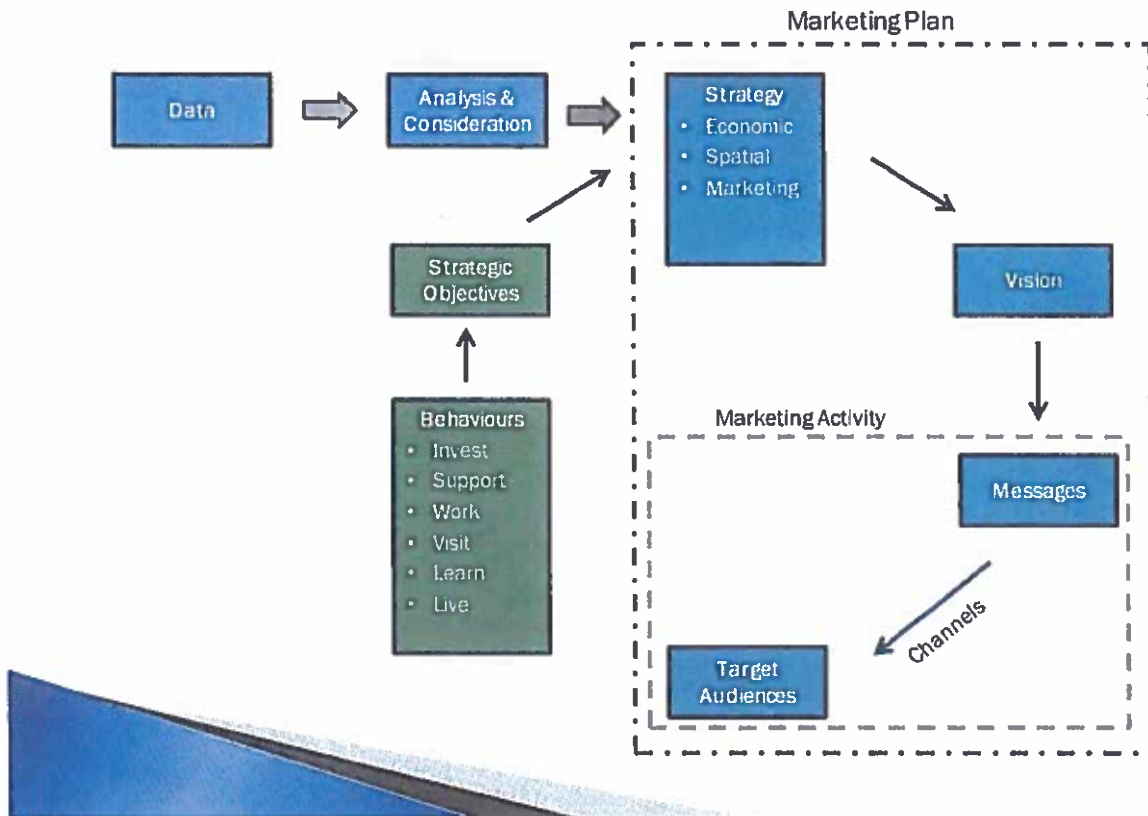
Meath County Council recognises that the strategy needs to be sufficiently resilient and robust to deal with different 'scenarios' both in terms of regional regulatory policy and variations in macro national climate change.

2.7 Spatial Implementation Plan

This will be structured in the same way as the Economic Action Plan focusing on recommendations in terms of urban centres and sites in addition to policy analysis and formation. The latter will convey best practise to integrate investment opportunities with land-use planning proposals. The spatial element of the strategy will consider a number of sites around the county with employment development potential, together with existing services and identify what additional supports will need to be put in place to make the economic environment of County Meath more investor-ready and/or attractive to business development.

2.8 Marketing Plan

Marketing Plan – Schematic Plan



Based on the 'Vision for Meath', best practise will be used to promote future economic activity in Meath (FDI & indigenous), specifying appropriate target audiences and objectives.

Marketing Plan – Audiences



- Which sectors?
- What existing perceptions?
- How to matching USPs with audience needs?
- What communications channels?

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2.9 Implementation

One of the main challenges of the Economic Development Strategy lies in the implementation of the individual actions and making sure that they are delivered in an integrated manner. The interrelationships between the different plans and action areas will necessitate that they are brought forward contemporaneously and in a co-ordinated fashion. A collaborative approach guided by adherence to the strategic vision offers greater opportunities for implementation. Rather than creating new layers of formal institutional structures, this approach depends on stakeholder consensus and coalition building. Project delivery mechanisms stress inclusive stakeholder participation to achieve this consensus. It is suggested that the implementation will involve a bottom-up approach. This involves horizontal co-operation between public and private bodies and decentralised vertical cooperation between different tiers of government and public administration.

Initiatives should be developed and championed at county level but reinforced by regional level and national inputs, thereby securing a high degree of buy-in and

commitment. Central government departments and national agencies have the role of supporting county-level and regional initiatives.

Clear themes and key outputs shall be identified so as to ensure this strategy can not only be effectively implemented but also adequately measured. In addition, recommendations to set up an implementation and monitoring group will be set out including proposals for funding and stakeholder collaboration.

3. Conclusion

In summary, it is the opinion of Meath County Council that this strategy merits *Pilot Status for Best Practice* for the following reasons:

- It synergises spatial planning with the delivery of primary economic objectives
- It is pioneering in that it has anticipated current government policy and has the ability to deliver key targets therein
- It is an action based, plan led approach to sustainable economic development
- It is focused, evidence based and deliverable
- It is innovative in it's preparation with particular reference to the methodology and collaborative techniques
- It is a practical, measurable and implementable strategy

We are satisfied that the successful implementation of this strategy can effectively drive the economic and social development of County Meath.

Concluded.

Comhairle Chontae na Mí

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Forward Planning Section

Our Ref: File 40

15th March 2013

Mr Bruce Mc Cormack,
Planning Inspector,
Planning Section,
Department of Environment, Community and Local Government,
Custom House,
Dublin 1.

Re: Economic Strategy for Meath

Dear Bruce,

Further to our conversation earlier this week wherein you asked for a formal outline of our proposals in the above regard, I set out hereunder the rationale for the above. As advised it is intended that an Economic Strategy for Meath will be inserted into the newly adopted Meath County Development Plan 2013-2019 by means of a Variation in early 2014. This exercise is predicated on the premise that the Councils strategies and actions are focused on delivering on the No. 1 Corporate Objective: *"To drive the economic and social development of County Meath"*.

The recently published County Development Plan has brought into focus inter alia, two key patterns of unsustainable economic activity in County Meath i.e. 7 out of 10 members of the workforce resident in Meath travel to work outside the county on a daily basis. Furthermore the Retail Strategy identified a phenomenal 60% higher order retail leakage out of Meath, predominantly to urban centres in counties Louth and Fingal. A recent economic report from the RPG GDA Office also indicates that Navan, and Drogheda (part of which is in Meath) have the highest regional unemployment rates of 23 % and 24% respectively among primary economic growth areas of the GDA. As discussed, the current population of County Meath is c.186,000 and it is clear that sustainable communities are not being successfully embedded on the basis of the foregoing statistics alone. The Economic Strategy can thus be viewed as a necessary and legitimate corporate response to this current challenging socio-economic situation for the citizens of Meath.

Putting People First – A New Role for Local Government published by the Department of the Environment, Community and Local Government on the 16th October 2012 endorses a "clearer and enhanced role for local government in promoting and facilitating enterprise and economic development" and outlines a sequential approach to be taken at national, regional and local level. The document envisages the preparation of Regional Spatial and Economic Strategies by the proposed new Regional Assemblies to underpin national economic plans and programmes. It also envisages that individual local authorities will prepare and adopt County Economic Strategies by means of the variation process to transpose these regional strategies into lower level statutory land-use plans.

Meath County Council positively embraces this challenge and the foundation has already been firmly established both locally and regionally for the implementation of this action. The Meath County Development Plan 2013-2019 includes a new Core Strategy with a goal to *"Build on and enhance the competitiveness and attractiveness of Meath in order to make it one of the country's prime locations for indigenous and foreign economic and employment*

generation investment". It outlines clear policies and objectives to support this goal and sets out a clear economic role for our towns and specifies the target sectors for investment. The Draft Mid-East Economic Development Action Plan confirms the key role that Meath will play in collaboration with Kildare and Wicklow to achieve agreed economic priorities for the Mid-East Region. The common objective shared by the 3 counties as outlined in the document is to successfully dovetail with, and complement, the Dublin City Economic Development Action Plan. This high level draft strategic document thus fulfills to a significant degree, the role envisaged for the future regional strategies by outlining the Mid-East Regional Authorities (MERA) economic expectations and ambitions for the region and its infrastructural priorities for investment for the period 2010-2022.

Based on the foregoing factors, Meath County Council has thus collaborated with its regional stakeholders and successfully embedded a clear, strategic, and consensus based format for the making of this variation in line with the ordinances envisaged in 'Putting People First'. The Economic Strategy for Meath will demonstrably comprise a number of logical phases together with the proactive engagement of key stakeholders throughout the process. The collaborative approach includes the establishment of the following;

1/ Technical Working Group.

2/ Meath Economic Forum.

The membership of the Meath Economic Forum comprises successful high achieving influencers with Meath connections or backgrounds. The role of its members is to act as ambassadors and champions for economic development in County Meath both nationally and internationally. John Bruton, former Taoiseach and EU Ambassador, has agreed to chair this high-level group.

It is envisaged that the Technical Working Group will comprise senior staff from the relevant Service Directorates in Meath County Council and national and regional guiders of process. Your offer of assistance to this group is welcomed and appreciated. It is also the Councils intention to request the assistance and expertise of Colm Mc Coy, RPG Officer and he has in principle, indicated his willingness to participate. The primary task of this group is to act as liaison with the Forum and provide research capacity and technical guidance in the preparation of the Economic Development Strategy. Consequently it is envisaged that there will be close working co-ordination and collaboration between both groups.

There are a number of integrated critical stages fundamental to the successful delivery of this project. I am pleased to inform you that the Council has initiated Phase 1 of the process. We have engaged the services of NUIM/NIRSA to conduct research on a baseline multi-factorial study to set out the economic profile of Meath. The latter will form the key foundation stone of the strategy. The principal investigator is Dr. Chris van Eggeraat (NUIM) assisted by Mr. Justin Gleeson (NIRSA).

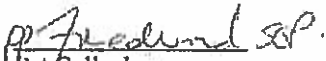
Meeting 1 of the Meath Economic Forum is scheduled for the 9th April wherein it is envisaged that a presentation will be given on the preliminary findings of the Baseline Study by Dr Chris van Eggeraat together with a presentation of the key findings on retail activity by John Spain who advised on the Retail Strategy in conjunction with the County Development Plan.

The collaborative input from the Department Inspectorate and the Regional Planning Authority to our Forward Planning Work Program over the past year has been very beneficial and is viewed as an essential component in the successful delivery of a significant body of work. Furthermore, as discussed, Minister Hogan has now set out new parameters for the future role of Local Authorities in the economic development of their administrative areas, incorporating a specific role for the Forward Planning/Plan-Making Process. The County Manager has indicated that Meath County Council is fully committed to fulfilling and delivering on this enhanced and challenging remit.

We look forward to your participation and guidance on this project and as discussed the Council would greatly appreciate if your Department would consider awarding *Pilot Status for Best Practice* for the overall project. Should you require any elaboration on the above, do not hesitate to make contact and I attach hereunder a schemata of the various stages in the proposed process.

Corporate Goal No. 1 <i>To drive the economic and social development of County Meath</i>
Stage 1: Baseline Study NUIM (already in progress) Conduct a baseline multi-factorial study to set out the economic profile of Meath. Completion date – Q 2 2012
Stage 2: Economic Development Strategy for Meath Development of Strategy in collaboration with the Economic Forum and the Internal Working Group Incorporate the findings of the baseline study and other relevant material Outline future priority actions, policies and procedures/for recommendations Completion date – Q 1 2014
Stage 3: Variation to CDP Incorporate Economic Development recommendations Completion date – Q 2 2014

Yours Sincerely,


Pat Gallagher,
Senior Planner,
Planning and Strategic Transportation.

APPENDIX G
PLANNING CONTEXT REPORT
JULY 2016.

Planning Report

In respect of

**Draft Ministerial Direction in relation to Variation No. 3 of the
Meath County Development Plan 2013 - 2019**

Prepared for

Meath County Council

Prepared by

John Spain Associates

July 2016

 **John Spain Associates**

Planning & Development Consultants
Chartered Town Planners & Chartered Surveyors

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E-mail info@johnspainassociates.com

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COUNTY DEVELOPMENT PLAN 2013 – 2019 AND
THE STRATEGIC APPROACH ADOPTED TOWARDS
THE PROPOSED LIVE/WORK COMMUNITY AT DUNBOYNE NORTH3

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1.0 **INTRODUCTION**

- 1.1 This Planning Report has been prepared by John Spain Associates in respect of the Draft Ministerial Direction issued in respect of Variation No. 3 of the Meath County Development Plan 2013 – 2019. The Draft Direction requires the following:

"The County Council of Meath County is hereby directed to take the following steps with regard to the Meath County Development Plan 2013 – 2019 ("the development plan").

- a. *The map entitled 'County Development Plan 2013-2019 Variation No. 3 Amendments – Dunboyne North – Dunboyne – Clonee – Land Use Zoning Objective Map' which sets out the zoning objectives for Dunboyne North – Dunboyne – Clonee in the Meath County Development Plan 2013-2019 is to be amended by removing:*

- i. *The re-zoning of lands at Pace, north of Dunboyne for a mixture of uses including objective 'A2' (residential), objective 'E1/E3' (high technology/manufacturing/office) and objective 'E3' (logistics/warehousing)*

And

- ii. *The Objectives 'Dunboyne North OBJ1 and OBJ2'."*

- 1.2 The effect of the required amendment is that the zoning objective pertaining to the subject lands at Dunboyne North will revert to their current objective within the Dunboyne, Clonee & Pace Local Area Plan 2009.

- 1.3 This report briefly summarises the intentions of Variation No. 3 of the Meath County Development Plan 2013 – 2019 and outlines the strategic approach to the proposed live/work community at Dunboyne North, before analysing and commenting on the the Draft Direction.

2.0 **SUMMARY OF VARIATION NO. 3 OF THE MEATH COUNTY DEVELOPMENT PLAN 2013 – 2019 AND THE STRATEGIC APPROACH ADOPTED TOWARDS THE PROPOSED LIVE/WORK COMMUNITY AT DUNBOYNE NORTH**

Variation No. 3 of the Meath County Development Plan 2013 - 2019

- 2.1 The key purpose of Variation No. 3 of the Meath County Development Plan 2013 - 2019 is to align the County Development Plan with the key tenets of the Economic Development Strategy for County Meath 2014 – 2022, as they relate to statutory land use planning.
- 2.2 The Economic Development Strategy sets out the medium-term strategy for economic development within County Meath, until 2022, and has been prepared in light of the recommendations set out within "Putting People First (2012) and the Local Government Reform Act of 2014. The Economic Development Strategy

is also mindful of the wider regional context of economic and employment development in Meath and neighbouring local authority areas.

- 2.3 It identifies that existing trends within the County which impact on the economic performance of the County include:
- A narrow base of economic activities in largely traditional areas;
 - A Foreign Direct Investment (FDI) deficit;
 - Low penetration of knowledge-orientated activities; and
 - Substantial skills leakage due to commuting trends from the County.
- 2.4 Together with setting evidence-based measures aimed at accelerating the economic transformation, revitalisation and sustainable development of County Meath, the Strategy also assesses spatial planning opportunities, in the form of identified sites around the county, and the 'fit' of these locations in the context of the County Development Plan. Dunboyne is identified as one of five key settlements within the county where the advancement of strategic sites is recommended.
- 2.5 The proposals within Variation No. 3 with respect to the lands at Dunboyne North includes the provision of housing as part of a sustainable community model, which will be integrated with employment, commercial, educational and community land uses, together with open space and amenities adjacent to a railway station, in order to ensure a sustainable land use mix. This is a key aspect of successfully implementing the Economic Development Strategy for County Meath 2014 – 2022.
- 2.6 Variation No. 3 is also key to the successful implementation of SEDO (Sustainable Economic Development Objective) 2.9 and 2.10 of the Local Economic and Community Plan 2016 – 2021, which seek to promote the county's towns and strategic employment sites as economic drivers for employment. Of particular relevance in the current context is the commitment under SEDO 2.9 to *"Examine pilot strategic sites to advance in Navan, Ashbourne, Drogheda, Kells and Dunboyne including targeted sectors and cluster opportunities. Develop and implement best practice to advance same."*

Background to the proposed live/work community at Dunboyne North

- 2.7 The Regional Planning Guidelines for the Greater Dublin Area 2010 - 2022 emphasise that towns within the Metropolitan Area, including Dunboyne, should make maximum benefit of existing assets - public transport, social and infrastructural – and this may include expansion of the built footprint of a settlement, where this is in tandem with the development of planned, high quality heavy or light rail based public transport projects and within carefully considered phased, high standard and integrated local area plans or Strategic Development Zones, where new housing and public transport and other services are delivered in tandem.
- 2.8 Dunboyne is identified by the Economic Development Strategy as one of five strategic sites around the county that will drive employment development in

Meath over the course of the medium-term and beyond. In this respect the development of Dunboyne as a strong, vibrant and sustainable community and location for economic development is vital to the success of the Meath economy and, more generally, the regional economy.

2.9 Dunboyne has been the beneficiary of significant investment in public transport, in particular the opening of the Clonsilla to Dunboyne railway line to commuter traffic and the construction of Dunboyne and M3 Parkway rail stations.

2.10 The Regional Planning Guidelines outline a commitment to the future growth of Dunboyne, which is envisaged as growing from a Level 3 to a Level 2 Retail Centre over a 20-year timeframe. In line with this commitment, the Council zoned the lands at Dunboyne North, under the Dunboyne, Clonee & Pace Local Area Plan 2009 – 2015, for substantial retail, offices and residential development. Objective RET OBJ 1V of the Local Area Plan sets out the Council's strategic approach to the development of the lands, outlining the Council's intention:

"To prepare a unitary Framework Plan for the 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 shall be phased and coordinated 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, coordinated and efficient manner where such development is facilitated and accompanied by the required infrastructure and services. The Framework Plan shall provide, inter alia:

- *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;*
- *High end office based employment uses at levels commensurate with its location and proximate to a multi modal public transport interchange;*
- *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."

2.11 The LAP envisages the lands at Dunboyne North as a significant opportunity for a sustainable urban extension of the town, in terms of retail, high density residential, community and recreational facilities.

3.0 THE DRAFT MINISTERIAL DIRECTION

- 3.1 Dunboyne is situated within the Dublin Metropolitan Area; it is the only settlement in Meath within the Metropolitan Area of the Greater Dublin Area. It is designated within the Regional Planning Guidelines for the Greater Dublin Area 2010 - 2022, as a Large Growth Town II and a Secondary Economic Growth Town within the Metropolitan Area. A Large Growth Town II is described as '*strong active growth towns, economically vibrant with high quality transport links to larger towns/city*' of approximately 15,000 to 30,000 persons. Furthermore, the Retail Strategy for the Greater Dublin Area 2008 – 2016 designates Dunboyne as a Level 3 Town/District Centre, with the potential to grow to Level 2 Town Centre by 2028. This objective from the Retail Strategy for the GDA is incorporated into the Regional Planning Guidelines for the GDA (Figure 8 – Retail Hierarchy), which states that '*Dunboyne will gradually develop over the next 20 years towards level 2 status*'. The Level 2 Town Centre status is at the same level as Navan, Blanchardstown, Tallaght and Dundrum.
- 3.2 The current proposal for the lands at Dunboyne North is not based on the regional retail designation of Dunboyne; rather, it is based on the recommendations of the Economic Development Strategy and it involves a reconsideration of the most appropriate future use of the lands in that context. This point is of critical importance because, where it has already been determined by the Council that the lands are not necessary for significant retail development to meet county or regional needs, there is a need to develop a strategy for the alternative development of these strategically located lands, noting the proximity to the M3 Parkway rail station, in order to ensure an overall strategy for the proper planning and sustainable development of the area. Variation No 2 of the CDP in 2014 saw no change in the status of the lands notwithstanding the Executive's wish to reconsider their designation in light of the economic downturn and discussions with transport and other stakeholders. Arising out of significant work carried out with the Elected Members regarding how best to implement the Economic Strategy in order to achieve the jobs targets set out therein of 7,500 by 2022, the Elected Members formed the view that support for a 'live work community' at this location represented the most appropriate use of the land and lent best support to emerging FDI interest.
- 3.3 Following the approach set out within the Draft Direction, the zoning pertaining to the lands would revert to their current zoning until such time as the new Regional Spatial and Economic Strategy is published. Given the importance to the economic prosperity of County Meath of fostering economic growth in locations such as Dunboyne North, which are now demonstrating an ability to attract and deliver major employment development, it is considered that it is unreasonable and unnecessary to require that the Council should await the publication of the RSES before devising an alternative strategy for the development of the lands. This would prevent the realisation of the opportunity to implement key elements of the Economic Development Strategy in the short term and result in critical lost opportunities, for no apparent benefit.
- 3.4 The approach set out within the Draft Direction is particularly difficult to understand, given the Draft Direction seems to have arrived at a similar view to Meath County Council (i.e. that the lands at Dunboyne North are no longer

needed to provide significant retail development in the future). If there were to be a review of the long term Level 2 retail designation at Dunboyne as part of the new RSES, as the Direction suggests, there would be a requirement to put in place an alternative planning strategy for these strategically important lands. This is precisely what Variation No. 3 seeks to do.

- 3.5 The success of the Council's strategic approach to fostering economic development, based on the recommendations and outcomes of the Economic Development Strategy, and the attractiveness of the Dunboyne North as an employment development location can be evidenced through recent high profile announcements of significant employment development in the area. Shire announced earlier this year their intention to develop a manufacturing facility at Piercetown, in the immediate environs of Dunboyne North. The Shire facility will be active in bio-pharma manufacturing on a 120-acre site and will see 400 highly skilled jobs created in the area over the next four years, with an additional 700 jobs being created during the construction phase. Avoca has also announced plans to open its largest retail facility in Ireland at Dunboyne North. This will see the creation of 80 jobs. Furthermore, within the lands the subject of the Draft Direction themselves, Aramark, which acquired Avoca in 2015, is actively considering a European operations centre, with an estimated 500+ jobs at the site next to the M3 Parkway Rail Station (not including the construction phase jobs). These examples are a very clear demonstration of the attractiveness of the Dunboyne North area to major employers and also that the Economic Development Strategy is already being successfully implemented. The Draft Direction does not reference any of these significant investments at any point.
- 3.6 A further significant and very surprising omission from the Draft Direction is the absence of any reference to the newly built railway station, M3 Parkway, at Dunboyne North. Given the stated concerns in the Draft Direction for the potential impact of the proposed live/work community on the operation of the M3 Motorway and Junction 5 Dunboyne North, it is difficult to understand how there is no mention within the Draft Direction of the potential opportunities for modal shift, arising from the creation of an employment campus and related sustainable housing in such close proximity to a high quality public transport facility.
- 3.7 With respect to the requirement that a comprehensive traffic assessment of the proposed live/work community proposal should be undertaken, in order to ensure the avoidance of any adverse impact on the national road infrastructure must be provided, we are not aware of any other County Council in the State having been requested to undertake such a detailed level of traffic impact assessment at the Development Plan stage for an individual site. This is considered to be a development management issue. Fingal County Council has proposed under its Draft County Development Plan 2017-2023 to zone a very substantial amount of land for employment-related development close the junction of the M50 and the M2 and South Dublin County Council recently zoned additional lands for employment-related development to the south of the M4 and west of the M50, as part of its new County Development Plan. We are not aware that any detailed transport assessment of the proposals was undertaken in either instance. The Draft Direction seems to take an inconsistent approach in this instance, suggesting that a greater level of assessment is required than is the case elsewhere or is required by guidelines.

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- 3.8 In any case, we note the preparation of, as part of the submission by Declan Brassil & Company Limited, an assessment of the M3 Junction 5, Dunboyne North. This assessment, undertaken by Cronin Sutton Civil and Structural Engineering Consultants assessed the operation of Junction 5 at base year of 2025, taking into consideration traffic arising from the current proposed zoning of the lands at Dunboyne North, and concluded that the junction would operate '*within capacity*'. This is an important consideration, in the context of the concerns expressed within the Draft Direction and it is considered that this conclusion should alleviate any concerns in this respect. It is hoped that this addresses the concerns set out within the Draft Direction in this respect.
- 3.9 In terms of the wider sustainability of the proposed employment zoning, the intention is that current outbound commuters would be intercepted at Dunboyne North, where new high skilled employment opportunities will offer an alternative to commuting into Dublin City. Outside of Dublin, Meath experiences the highest level of outbound commuting of workers in the State. 32,942 or 54% of the county's workforce commute out of the county for work, with 41% of these commuters working in Dublin. The overarching intention of zoning proposed in this area is to target FDI development opportunities on lands zoned in the area of the M3, including at Dunboyne North, where there is a history of such major employment developments being delivered. Delivery of FDI development will almost certainly reduce the level of outbound commuting experienced as outbound commuters represent a major talent pool for FDI companies investing in the county and are a key selling point for the county, with over 41% of those commuting holding third-level or higher educational attainment. Furthermore, in locating such developments in very close proximity to a high quality public transport corridor, there will be options for inbound commuters to travel by train to work at Dunboyne North.
- 3.10 With regard to the proposed residential component of the live/work community at Dunboyne North, we question the assertion that the location of the lands at Dunboyne North would be 'distant', 'detached', 'disconnected' or 'isolated', as is stated within the Draft Direction.
- 3.11 The Draft Direction refers to the residential zoning being '1.5-2 km away'. It is presumed that this is 1.5-2km from the town centre but this is not made clear in the Draft Direction. In any case, the statement is incorrect. The edge of the identified development area boundary of the town is approximately 110m from the Dunboyne North lands and the built edge of the town is approximately 280m from the lands, in a direct line. The proposed residential area is approximately 1.3km by road to the established urban area and the town centre, as defined by the town centre zoning objective, is 600m from the residential area, in a direct line, and 1km by road. Most importantly, all of the residential lands are within 600m of M3 Parkway rail station and are within convenient walking distance of a commuter rail station.
- 3.12 With regard to the 'detached' comment, it seems that the Draft Direction has taken the view that the sequential test would be breached, due to the 1.5-2km distance to the town. This assessment does not appear to take into account the existence of the M3 Parkway rail station or the very clear guidance within the

Development Plan Guidelines for pursuing opportunities for synergies between land-use and transport planning. The Guidelines outline that *"Integrated land use and transport planning has a key role in delivering social, economic, and environmental sustainability."* In this respect, it is most surprising that in outlining what is considered in the Draft Direction to be a clear breach of the sequential test, the Draft Direction contains no reference whatsoever to the existence of M3 Parkway rail station within 600m of the proposed residential area. This fact is of critical importance to a thorough understanding of the Council's strategic approach because pursuing the synergy between land use and transport planning in this area is exactly what Meath County Council is attempting to do at Dunboyne North.

- 3.13 The proposed residential zoning is in accordance with the sequential test, as set out at Section 4.19 of the Development Plan Guidelines, as it maximises the utility of existing public transport infrastructure provision and in particular the M3 Parkway rail station and promotes the achievement of sustainability and gives preference to a public transport route and promotes integral mixed employment and residential development.
- 3.14 The Draft Direction also includes the term 'leapfrogging to more remote areas' in relation to the sequential test. The use of the term 'leapfrogging' suggests that more suitable development areas between the urban core or public transport corridors are not zoned in favour of more remote areas. Notwithstanding this suggestion, Variation 3 does not result in 'leapfrogging', in our opinion, as there are no other available lands of any significance between the existing urban area and the proposed development areas which might be considered more sustainable. Furthermore, the unzoned lands to the east and the immediate south-west of the town centre are both affected by significant flood risk issues. Indeed, whilst there is some additional land to the south of the town which could be zoned, that land is less preferable than the lands at Dunboyne North because it is much less well connected to public transport (the rail stations in particular) and the local employment areas.
- 3.15 The intention of the proposed live/work community at Dunboyne North is to create a sustainable new development, with a mix of commercial, residential, employment and recreational uses provided for adjacent to an existing train station. The lands would therefore not be 'isolated', as is being suggested.
- 3.16 The concept of live work communities is well established in an Irish planning context, having formed a key aspect of the Dublin Docklands, Clonburris and Cherrywood Strategic Development Zones. These SDZs are framed around the concept of being a highly sustainable, dense, mixed-use community, focussed on key public transport nodes. They are all separated from existing town centres.
- 3.17 A further example of this approach of locating significant new residential development in the Dublin Metropolitan Area at new rail stations is the zoning of lands at Woodbrook, Dun Laoghaire Rathdown. These lands are physically separated from the nearest adjoining settlements, Shankill and Bray, by green belt areas, and their zoning for residential development is based on the planned presence of a new Dart station at Woodbrook. A similar concept is found at Clongriffin in Dublin's North Fringe.

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- 3.18 Monard in County Cork is also separated from Cork City and other settlements and is again based on a proposed new commuter rail station. In these draft instances, it has clearly been accepted that there is an inherent sustainability in directing residential development to locations proximate to high quality public transport infrastructure. In fact, the Statutory Instrument under which the Monard SDZ was formally designated clearly highlights *“the efficient use of public investment in infrastructure facilities, including public transport”* as a key aspect of the reason for designating the lands and, indeed, in approving the SDZ scheme, An Bord Pleanála outlined that the proposal *“provides for an appropriate development of housing and related uses which will have access to means of public transport and which will allow the coherent development of the wider Cork area”* and that the land *“provides for adequate access to road, rail and other infrastructural facilities to service the area.”* The proposed live/work community at Dunboyne North is similar to these examples in this respect, albeit at a smaller scale and albeit with a greater emphasis on the provision of new local employment functions.
- 3.19 It is considered that the proposed live/work community at Dunboyne North, served by the existing M3 Parkway rail station is similar in concept to other examples of sustainable urban extensions focussed on rail corridors with the added important added element of substantial planned new local employment opportunities and the presence of the existing rail station.
- 3.20 Furthermore, the National Transport Authority has also researched the concept of rail focussed residential development and produced a study in 2013 entitled *Planning and Development of Large-Scale, Rail Focussed Residential Areas in Dublin (2013)*. This study explored options for focussing largescale residential development in Dublin on rail corridors. It identified a set of criteria in order to identify sites considered to represent ‘strategic residential development areas’. Such areas:
- *Are located within the four Dublin local authority areas; Are served by high quality public transport (heavy rail, DART or LUAS);*
 - *Have the ability to accommodate significant future population growth;*
 - *Have been designated under their respective governing statutory plans as areas suitable for residential development at a density in excess of 50 units per hectare;*
 - *Constitute strategic land banks which are currently designated for large-scale primarily residential development and which are appropriately zoned or designated SDZ or LAP areas;*
 - *Can be greenfield / brownfield sites;*
 - *Are generally not located in existing towns; and*
 - *Have not to date been completely built out.*
- 3.21 Dunboyne meets the requirements identified by the NTA to comprise a strategic residential development area, particularly given it is situated within the core Dublin Metropolitan Area (this does not apply to some locations within Dublin itself) as defined in the RPGs and it is also already identified within Variation No. 3 as a location which it is envisaged will accommodate high-density residential

development in the future. While it is in County Meath and not in one of the four Dublin authorities, it is located in the Dublin Metropolitan Area, served by a recently constructed commuter railway line and station. We note one of the criteria is that such locations “are generally not located in existing towns”. Examples referenced in the NTA study are Cherrywood, Clonburris and Clongriffin.

4.0 CONCLUSION

- 4.1 The requirement of the Draft Direction to return the lands at Dunboyne North to their current zoning appears to be to be unsustainable and contrary to government policy, as set out in the Retail Planning Guidelines for Planning Authorities, and contrary to the Meath Retail Strategy. If the Council were now proposing to zone the lands for substantial retail development purposes now, as per the Draft Direction, it is likely in our view that both Transport Infrastructure Ireland and the National Transport Authority would object to any such proposal.
- 4.2 The Economic Development Strategy for the county identifies the strategic importance of the lands to the economic future of the county and Variation 3 represents the most important opportunity in County Meath to successfully implement its Economic Development Strategy in a highly sustainable manner, with the development of a new live/work community served by high quality public transport, close to Dunboyne Town Centre and with all necessary local facilities and amenities incorporated. It would be a serious retrograde step for the sustainable economic development and proper planning and sustainable development of the county were this Draft Direction to be implemented.

APPENDIX H
ECONOMIC CONTEXT REPORT
JULY 2016

Economic Context Report

27 July 2016

Introduction and Overview

The purpose of Variation No. 3 of the Meath County Development Plan (CDP) 2013-2019 is to give effect to the Economic Development Strategy for County Meath 2014-2022, which was prepared in the context of Putting People First (2012) and the Local Government Reform Act 2014, and thereby designed in the spirit of the requirement that local authorities adopt and implement a more proactive approach to economic development and job creation.

The Economic Development Strategy was prepared by a multidisciplinary consultancy team comprising PMCA Economic Consulting, John Spain Associates (planning) and FTI Consulting (marketing) and was launched by Meath County Council in June 2015 at Ballymagarvey House, County Meath, at which Mr. Frank Ryan, Chairman of IDA Ireland and former Chief Executive Officer of Enterprise Ireland, gave the keynote address, in which he spoke of the importance of local authorities playing their part as public agencies in assisting enterprise and employment development in their respective administrative areas and wider functional regions. He also referred to the increasingly competitive and challenging international environment, which further underlines the importance of the public sector playing its part in supporting sustainable economic development in the State.

Mr. Ryan's remarks have proved particularly prescient in recent weeks, following the shock decision of the UK to exit the EU. Mr. Ryan and other external stakeholders have commented that the substantial, evidence-based Economic Development Strategy offers an exemplar model for local authority economic planning in the State and a summary of the report was independently published in *Pleanáil – Journal of the Irish Planning Institute* (Issue 21, 2015/2016, pp. 44-65) in an article entitled 'Planning for Economic Development in a Hitherto Commuter Location – The Case of the Royal County'.

While the unprecedented Brexit event for Ireland will mean heightened uncertainty for the country during the exit negotiation process, which is expected to take at least two years (but could persist much longer than this time due to the complexities involved and the fact that the UK is one of the largest economies in the world), PMCA Economic Consulting considers that the UK will become a more formidable competitor to Ireland for foreign direct investment (FDI) in the coming years, with the expectation that the corporation tax rate in the UK regions, including Northern Ireland and Scotland (perhaps Ireland's closest competitors for inward investment in the long-term), will be reduced to 12.5% or lower. In addition, State aid will no longer be an issue for the UK, opening up the very unattractive and complex vista of an asymmetric situation on the island of Ireland, in which the authorities in NI will no longer be constrained in providing public funding to enterprises while those in Ireland will continue to be bound by EU State aid rules. Generally speaking, trade and FDI are to a large extent substitutes – multinationals exist in part in response to barriers to trade – and PMCA expects that locations like Belfast, Derry/Londonderry, Edinburgh and Cardiff etc. will become more competitive relative to Irish locations in regard to attracting FDI in the years ahead, notwithstanding the fact that the EU will no longer be part of the EU.

Accordingly, Ireland needs to plan ahead on the basis that its 12.5% corporation tax advantage will erode over time and the country needs now to be more proactive than ever in respect of ensuring FDI, while at the same continuing to support indigenous enterprises.

In advising the Department of Finance on the preparation of Ireland's Medium Term Economic Strategy post-Troika in late 2013, Dr. McCloughan emphasised this particular point to civil servants, and the imperative to become more competitive also applies to local authorities like Meath County Council, which has made a terrific start in the implementation of its Economic Development Strategy 2014-2022.

However, the Draft Direction, if given effect, threatens to seriously undermine the achievements to date and heighten an already very uncertain economic environment.

Variation No. 3 is not about housing – rather the planned, limited residential development on the lands at Dunboyne North are part of the much wider objective of realising the goal of more jobs within County Meath – consistent with the overall vision of the Meath CDP 2013-2019. Housing is relevant insofar as it supports sustainable economic development, a point also made in the Minister's recently published Housing Strategy (July 2016), which highlights the importance of a competitive (and affordable) housing supply (including rental) for a modern, competitive economy. The importance of housing to economic competitiveness is also highlighted in the latest report from the National Competitive Council (at the time of preparing this report).¹

The good news is that the Economic Development Strategy is already being successfully implemented and Meath County Council takes great pride in playing a key part in the process. The successful application of the economic plan is especially apparent in the Dunboyne-Clonee-Pace Corridor, identified as one of five strategic economic development sites in the County.

The submissions received in regard to the Draft Direction – not least that from Aramark, which is considering a new investment in the lands under consideration, with the prospect of many hundreds of new jobs being created – are clear enough to PMCA in that the Draft Direction if proceeded with, would risk the loss of major new employment in the area and would also heighten the investment uncertainty, just when one would have been forgiven for thinking that the uncertain economic environment could not get any worse.

The evidence of the successful implementation of the Economic Development Strategy for Meath in the area in question takes the form of the significant new jobs announcements by Facebook, Shire and Aramark (owners of Avoca) in the past year, all in the vicinity of the lands at Dunboyne North. In particular, the new Avoca outlet will be developed on retail zoned lands on the other side of the M3 Motorway to the lands at Dunboyne North, with 80 new jobs. The Avoca site is next to the economic development lands at Piercetown, where the new Shire facility will be located. The new Shire facility on a 120-acre site will see 400 highly skilled jobs created in the area over the next four years, with an additional 700 jobs being created during the construction phase.² The Facebook investment at Clonee will be even larger than originally announced last year, with 2 main buildings, entailing 2,000 construction phase jobs and 150 longer-term jobs when the major new initiative is operational.

¹ Ireland's Competitiveness Scorecard 2016

(<http://www.competitiveness.ie/Publications/2016/Ireland%20s%20Competitiveness%20Scorecard%202016.html>)

² The Shire announcement has been the largest FDI jobs announcement by the IDA so far this year – please refer to the recent IDA press release *IDA Ireland Reports Strong First Half to 2016*

(<http://www.idaireland.com/newsroom/ida-strong-2016/>).

Within the economic development lands under consideration themselves under Variation No. 3, Aramark, which acquired Avoca in 2015, is currently considering the possibility of building a European operations centre, with an estimated 500+ jobs at the site next to the Parkway Rail Station (not including the construction phase jobs entailed in the installation of the major new operations centre on the lands). The Aramark Corporation is a leading global enterprise active in a number of sectors and with well over 250,000 employees worldwide.

In view of the submission from Aramark, it is clear enough to PMCA that, should the Ministerial Draft Direction zoning be put into effect, then the immediate impact would likely be the loss of this potentially very significant investment, with many hundreds of direct high quality new jobs being lost in the process, not to mention the wider economic impact of the additional jobs that would be created or sustained as a result of the potential new investment.

All these examples of the successful implementation of the Economic Development Strategy to date are in line with the spirit of Putting People First (2012) and the Local Government Reform Act 2014. It is clearly evident that the commercial investment market is backing this part of County Meath, given the level of interest shown to date. On the other hand, the Draft Direction would have the effect (inadvertently) of hindering or even preventing the possible new investment and this in turn would send out the wrong signal regarding future investment and jobs in County Meath.

County Meath LECP

The Economic Development Strategy, outlined in more detail below, also underpins the Meath Local Economic and Community Plan (LECP), which is aimed at reinforcing the actions set out in the Economic Development Strategy through the County Meath Strategic Policy Committee (SPC) for Economic Development and Enterprise and the County Meath LCDC (Local Community Development Committee). The Meath LECP was considered and vetted by the Eastern and Midlands Regional Assembly (EMRA), with which Meath County Council has a productive working relationship.

The Meath LECP is a practical, action-oriented resource capable of complementing the Economic Development Strategy underway in the County and also the regional-level economic development initiatives, including the Regional Planning Guidelines for the Greater Dublin Area 2010-2022, the Regional Action Plan for Jobs for the Mid-East Region (2015) and the ongoing work of the EMRA, in respect of its Regional Spatial and Economic Strategy (RSES), which will in due course replace the aforementioned RPGs for the GDA. The Department of Jobs, Enterprise and Innovation held a workshop in Navan to inform the Regional Action Plan for Jobs in 2015, at which Dr. McCloughan attended.

The implementation of the Meath LECP and the Economic Development Strategy are also benefitting from the advice of the Meath Economic Forum (MEF). Formed in 2013, and operating in a voluntary capacity, and supported by Meath County Council, the MEF is chaired by Meath native and former Taoiseach Mr. John Bruton and comprises senior figures from the business world, academia and the policy environment with connections to the County, all with the goal of helping to support and promote economic and employment development in Meath. The MEF is an important asset for progressing economic development in the county and Meath County Council looks forward to continuing this important relationship in the years ahead, during the lifetime of the LECP, and beyond.

Dr. McCloughan assisted the Meath Economic SPC in drawing up the Economic Element of the LECP and there is now a consistent network of actions currently being implemented for the purposes of facilitating enterprise and job creation in the County, benefitting from the inputs of the Economic SPC, the LCDC and the MEF.

The Meath LECP is publicly available on the website of Meath County Council³ and fifteen practical Sustainable Economic Development Objectives (SEDOs), reflecting the aims of the Economic Development Strategy and having the overall goal of facilitating more economic impact, including employment, within the County. Along with Navan, Drogheda (Southern Environs in Meath), Ashbourne and Kells (which is included in the new EU Regional Aid Map for Ireland 2014-2020), Dunboyne is identified as a strategic economic development centre for the County, and this includes the Dunboyne-Clonee-Pace Corridor, which has been gaining considerable interest from FDI companies and the new inward investment will be important to addressing the deficit in FDI in County Meath identified in the Economic Development Strategy.

In this regard, SEDO 2.9 of the Meath LECP states as follows:

“SEDO 2.9 Facilitate enterprise and employment development within County Meath through a streamlined and efficient local planning process.”

This SEDO has the purpose of promoting Meath’s towns and strategic employment sites as the economic drivers for employment in the County while acknowledging the role of the rural economy and the respective activities and outcomes within the SEDO are:

- “Activities
 - Promote the hierarchy of economic centres and targeted sectors in Meath with the objective of facilitating significant new enterprise development.
 - Examine pilot strategic sites to advance in Navan, Ashbourne, Drogheda, Kells and Dunboyne including targeted sectors and cluster opportunities. Develop and implement best practise to advance same.
 - Ensure local planning processes in place aimed at ensuring a flexible and business friendly system that will facilitate employment opportunities.
- Outcomes
 - Sustainable development promoted
 - Economic growth within these towns advanced
 - Meath a business friendly environment”

Similarly, SEDO 2.10 of the Meath LECP is to:

“Facilitate enterprise and employment development within County Meath through effective infrastructure provision – sites and property solutions for employment generation.”

The Activities in SEDO 2.10 are to:

- “Promote workspaces for indigenous and/or rural enterprise development.
- Compile and regularly update database comprising sites for employment generation and workspaces available in business/industrial parks, office & commercial developments, incubation and research facilities.
- Advance suitable site solutions to ensure developments meet market needs with high quality infrastructure and utility provision.
- Develop and operate best practice procedures to enter into public private partnerships.

³ The Meath LECP is available at:

<http://www.meath.ie/Community/CommunityDevelopment/LocalCommunityDevelopmentCommittee/LocalEconomicandCommunityPlan/>.

The Outcomes in SEDO 2.10 are:

- “Development of Incubation space for Enterprise
- Increase in business floor space (office/industrial/retail etc) within the County
- Levels of vacancy of existing workspaces reduced
- Suitable sites available for development.
- Opportunities of public private partnerships maximised.”

As a suitable site for economic development, which was zoned for that purpose in 2009, the lands under consideration at Dunboyne North come under the remit of SEDO 2.10 of the Meath LECP; and the evidence to date, in the past year, illustrates very clearly that investor interest in the site is very strong.

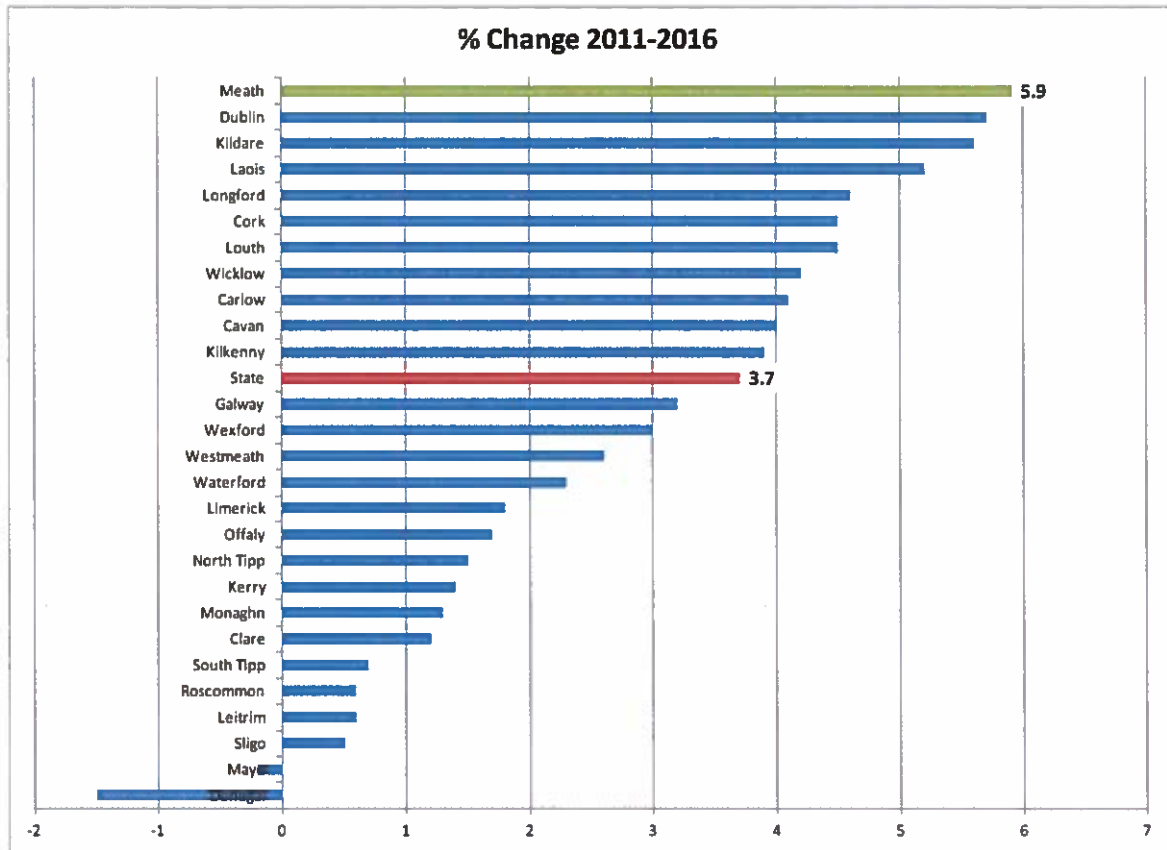
All of the SEDOs contained in the Meath LECP are aimed at facilitating enterprise and employment development within County Meath, in recognition of the process that public agencies like Meath County Council are best-placed in supporting the private sector to invest and create jobs locally, and the SEDOs are all based on the hard evidence presented in the Economic Development Strategy that clearly show the need to further develop enterprises in the County – including from the perspective of supporting the sustainability of funding in respect of Meath County Council, which is outlined further below.

Relative Population Growth (2011-2016) in County Meath and in the Dunboyne Area

It is well-established that County Meath has been for the past number of censuses one of the fastest growing counties in the State in terms of population. This in turn has placed significant pressure on local resources and housing, and also on the sustainability of funding of Meath County Council, to which we return at the end of this report. The considerable population growth experienced by the County further highlights the need for Meath County Council, working in tandem with its partners, including the State enterprise development agencies, to facilitate more employment and economic impact within the County, which in turn underscores the importance of giving effect to Variation No. 3 of the Meath CDP 2013-2019.

The recently released Preliminary Population Estimates from Census 2016 by the CSO show that County Meath experienced the most rapid rate of growth in population of any county in the State during 2011-2016, bearing in mind that the CSO data are preliminary estimates and subject to possible change when the figures are finalised next year.

Figure 1: Population Change in the State and Irish Counties 2011-2016



Source: Population figures from the CSO (preliminary estimates 2016).

The table below shows the rate of population change during 2011-2016 in the State, County Meath and in the Ratoath Local Electoral Area (LEA), within which the Dunboyne Electoral Division (ED) is located. As can be seen, the Dunboyne and Ratoath EDs are the largest in this part of the County and it is envisaged that the new investments in the lands under consideration would benefit residents in these EDs as well as elsewhere in the County, and inbound commuters from other parts of the country.

Table 1: Population Change in the State, County Meath, Ratoath Local Electoral Area and Dunboyne and the Other Electoral Divisions within the Ratoath LEA

Analysis of Population Change 2011-2016			
Location	Population		
	2011	2016 (e)	% Change
State - Ireland	4,588,252	4,757,976	3.7%
County Meath	184,135	194,942	5.9%
Ratoath Local Electoral Area	31,894	33,556	5.2%
Culmullin	1,054	1,136	7.8%
Dunboyne	9,578	10,072	5.2%
Dunshaughlin	5,676	5,840	2.9%
Killeen	1,091	1,157	6.0%
Kilmessan	1,388	1,562	12.5%
Kilmore	1,507	1,587	5.3%
Ratoath	10,561	11,079	4.9%
Rodanstown	1,039	1,123	8.1%

Source: Population figures from the CSO (preliminary estimates 2016).

The Meath Development Strategy for County Meath 2014-2022

The Foreword of the Economic Development Strategy for County Meath 2014-2022 succinctly captures the economic performance of Meath (at that time):

- *“Meath is a fundamentally prosperous county with a number of innate comparative advantages and the economic performance of the county is stronger than most other parts of the country.*
- *However, the current economic model is unlikely to be sustainable and is at variance with the current Meath County Development Plan (CDP) (as varied), which envisages a more dynamic and vibrant local economy supporting sustainable communities throughout the county.”*

In the same part of the report, the consultants who prepared the economic plan summarise how, pre-the Economic Development Strategy, Meath had not been operating sub-optimally from an economic perspective:

- *“Manifestation of Meath not fulfilling its economic potential takes a number of forms, including:*
 - *Narrow base of economic activities in largely traditional areas;*
 - *Low penetration of knowledge-oriented activities;*
 - *Low educational attainment (among those working within the county);*
 - *FDI deficit – the proportion of jobs in Meath accounted for by agency-assisted foreign-owned firms is less than half the corresponding figure for the country as a whole;*
 - *Substantial skills leakage in the form of the large cohort of outbound commuters.”*

The Economic Development Strategy continues to observe in its Foreword that:

- *“Meath could very well continue with the predominantly passive economic model and still perform reasonably well during the coming years – where outbound commuting would continue to grow and the county would become even more reliant on Dublin, Dundalk and Kildare for large-scale knowledge-based employment. In the process, Meath would become an even bigger satellite location or ‘commuter county’, while expanding economically, but sub-optimally so.”*

Underpinning the conclusions of the consultants’ Economic Development Strategy are the findings of stakeholders with whom the authors engaged during the preparation of the report, as well as the extensive independent data analyses contained within the report. According to the Economic Development Strategy 2014-2022 (Foreword):

- *“Clearly, in commissioning this study, and having regard to the significant changes put in place in the past year or so, Meath County Council wishes to see, and deliver, greater retention of economic impact in the county in support of the overall vision provided for in the Meath CDP.*
- *The many stakeholders with whom the consultancy team engaged during the assignment share this aspiration for the county and/or believe that greater retention of economic impact within the county is warranted and feasible.”*

Key Facts and Empirical Rationale for the Economic Development Strategy

The Economic Development Strategy for County Meath 2014-2022 sets out in great detail the baseline or pre-strategy economic profile and performance of the County, based on official data sources, including from the CSO, Enterprise Ireland and IDA Ireland, and the Department of Jobs, Enterprise and Innovation (DJEI). The key facts are summarised as follows:

- Meath is one of the most affluent counties in Ireland, reflected in the fact that primary income per head is higher than disposable income per head, which in turn means that income taxes and national insurance contributions to the Exchequer from residents in the County exceed social welfare payments from the Exchequer to residents in the County, in turn reflecting the fact that employment among residents of working age in the County is comparably high (as it is in Dublin, Kildare and Wicklow too).
- In other words, the overall economic situation in Meath means that the County is a net contributor to the State/Exchequer.
- However, this fundamentally positive situation does not necessarily mean that the local economy of Meath is competitive or sustainable compared with other counties or locations within the State – the Economic Development Strategy is clear that the past, pre-strategy model of economic development in the County, which was based on a largely passive residential model of development, is unsustainable and at variance with the overall vision of the Meath CDP 2013-2019, namely:

“Meath to be a county that fosters sustainability throughout its vibrant communities, dynamic economy and unique cultural and natural heritage”

- The unsustainable nature of the local Meath economy is sharply manifest when one examines the composition of employment in respect of the County.
- Based on analysis of special CSO census data (namely the Place of Work, School or College Census of Anonymised Records or POWSCAR, which was conducted as part of Census 2011), the following facts on the local labour market are relevant to note here:

- There were a total of 38,822 jobs in Meath in 2011, made up of 28,449 jobs among Meath residents and 10,373 jobs held by people working in the County but living outside of the County (inbound commuters);
- In addition, there were a further 32,942 jobs held by outbound commuters in that year (i.e. people living in Meath but working elsewhere);
- These figures imply that over half (54%) of all residents of Meath at work did so outside the county in 2011;
- In comparison with other local authority areas in the State, the outbound commuter rate in Meath was the highest in the country, apart from South Dublin, Fingal and Dún Laoghaire-Rathdown, which had outbound commuter rates a little above that in Meath but less than 60% and one would expect the commuting rates among these local authority areas of the capital to be high in any event owing to the concentration of employment in the Dublin Region within the Dublin City Council area).
- Not surprisingly, Dublin is the main destination for work of the outbound commuters from Meath – the Dublin Region accounted for 25,008 jobs among Meath commuters in 2011, which was almost as many as the number of jobs pertaining to those both living and working in Meath in that year (28,449).
- The risk is that, if left unchecked, the almost 4,500 jobs in favour of the outbound commuters *vis-à-vis* those who both live and work in Meath will grow even more in the coming years, meaning that the outbound commuter rate will escalate well beyond the 54% rate observed in the 2011 Census in Census 2016 and Census 2021, and beyond. While it is likely that there will be growth in the outbound commuter rate between 2011 and 2016 (the results will become apparent in 2017), it is envisaged that 2016 will see the outbound commuter rate in Meath peak, with more positive outcomes becoming visible in subsequent censuses.
- Large and growing outbound commuting is not sustainable for local communities because it entails significant social and community costs as well as economic leakage – spending 2 hours or more per day travelling to and from work is not conducive to life beyond work and erodes social capital and its benefits.
- In some parts of the County, the outbound commuter rate is well above the 54% rate observed for Meath as a whole at the last census.
- The situation in Dunboyne in 2011 is illustrative of the pronounced outbound commuting from the south of the County.
- In that year, there were 1,163 jobs in the Dunboyne settlement area (not including Clonee). Of these, 392 jobs were held by people living in Dunboyne, 302 by people living elsewhere in County Meath and the remaining 469 jobs were held by inbound commuters to Meath working in Dunboyne.
- On the other hand, there were 2,309 people living in the Dunboyne settlement area working outside of County Meath in that year, which would imply an outbound commuting rate for Meath in respect of people living in Dunboyne of 77% (the outbound commuting rate for Dunboyne in respect of the people living there was even higher at 85%).⁴

⁴ The figure of 77% is calculated as the number of people living in the Dunboyne settlement area working outside of County Meath (2,309) as a proportion of those living in Dunboyne, and other parts of Meath, and working within or outside the County in 2011 (2,309+392+302). On the other hand, the figure of 86% is calculated as the number of people living in the Dunboyne settlement area working outside of County Meath (2,309) as a proportion of those living in Dunboyne and working within or outside the County in that year (2,309+392).

- The evident 'dual' in the local economy of County Meath – between those both living and working within the County, on the one hand, and the outbound commuters, on the other hand, is further illustrated when one considers another key fact highlighted in the Economic Development Strategy, namely that, of the aforementioned 38,822 jobs within Meath in 2011, just 4,683 or 12% of the total were in IT and professional services, whereas the corresponding proportion for the State was 18.5% and that among the outbound commuters from Meath was 24% (in the Dublin Region it was over 30%).
- This salient fact regarding the composition of the Meath economy reflects the largely traditional nature of enterprise activity in the County and the comparably large reliance on public sector (i.e. non-market) employment. In regard to the former, many of the enterprises based in Meath operate in traditional manufacturing sectors, such as food processing, traditional engineering and other traditional industries like mining, quarrying, furniture etc. High-tech, knowledge-based economic activities are significantly under-represented in the County, despite the preponderance of outbound commuters with the skills and professional experience that would permit more of these sectors to be accommodated within the County, not to mention Meath's proximity and transport links with the capital, which gives it access to the talent pool in order to attract more such activities into the County.
- This salient feature of the local economy is further manifest when we come to look at the composition of employment by indigenous or Irish-owned enterprises and FDI enterprises.
- The Economic Development Strategy reveals that indigenous enterprise employment (specifically employment among Enterprise Ireland client companies in Meath) accounts for a relatively high and growing proportion of all employment in the County. In particular, in 2011, 12% of all jobs in Meath were in EI client companies, compared with 8% for the country as a whole. Subsequent research reveals that during 2011-2014 the proportion of all employment within Meath accounted for by EI client companies grew strongly by over 7% per year on average, compared with 2.4% for the State, and the growth in EI client employment in Meath has outperformed that in the Eastern SPA (Strategic Planning Area) of EMRA, the Dublin SPA, the Midland SPA and that in EMRA overall during the same period, as well as the State as a whole (see Table 2 and Figure 2 below).
- While the growth in indigenous company employment in County Meath is welcome, these jobs, in largely traditional industries, such as food processing, are now facing significant competitive threat given the devaluation of sterling relative to the euro and the uncertainty over the Brexit outcome, which unfortunately is set to continue.
- Furthermore, the preponderance of traditional and public sector employment within County Meath is reflected in the comparably low educational attainment of those who both work and live within the County: the Economic Development Strategy reveals that, in 2011, just 25% of those people both living and working within the County had third-level educational attainment; in contrast, the corresponding proportion for the State as a whole was much higher at 38% and that among the outbound commuters from Meath was even higher again at 41%.
- The Economic Development Strategy 2014-2022 also shows the relatively low incidence of FDI in Meath, in sharp contrast to the penetration of EI client employment in the County, which occurs in largely traditional industries requiring relatively low educational attainment.
- In 2011, the Economic Development Strategy reveals that just 3% of all employment within County Meath were in IDA client companies (i.e. FDI companies), compared with 8% for the country as a whole.

- Furthermore, additional research shows during 2013-2014 FDI employment in Meath grew by just 1.3%. While this was an improvement on the 25% shrinkage in FDI employment within the County during 2005-2014, the gap with other counties and regions of the State is striking (see Table 2 and Figure 3 below).

Summarising the key economic facts, it is evidently clear that Meath faces the following challenges or opportunities now and in the coming years:

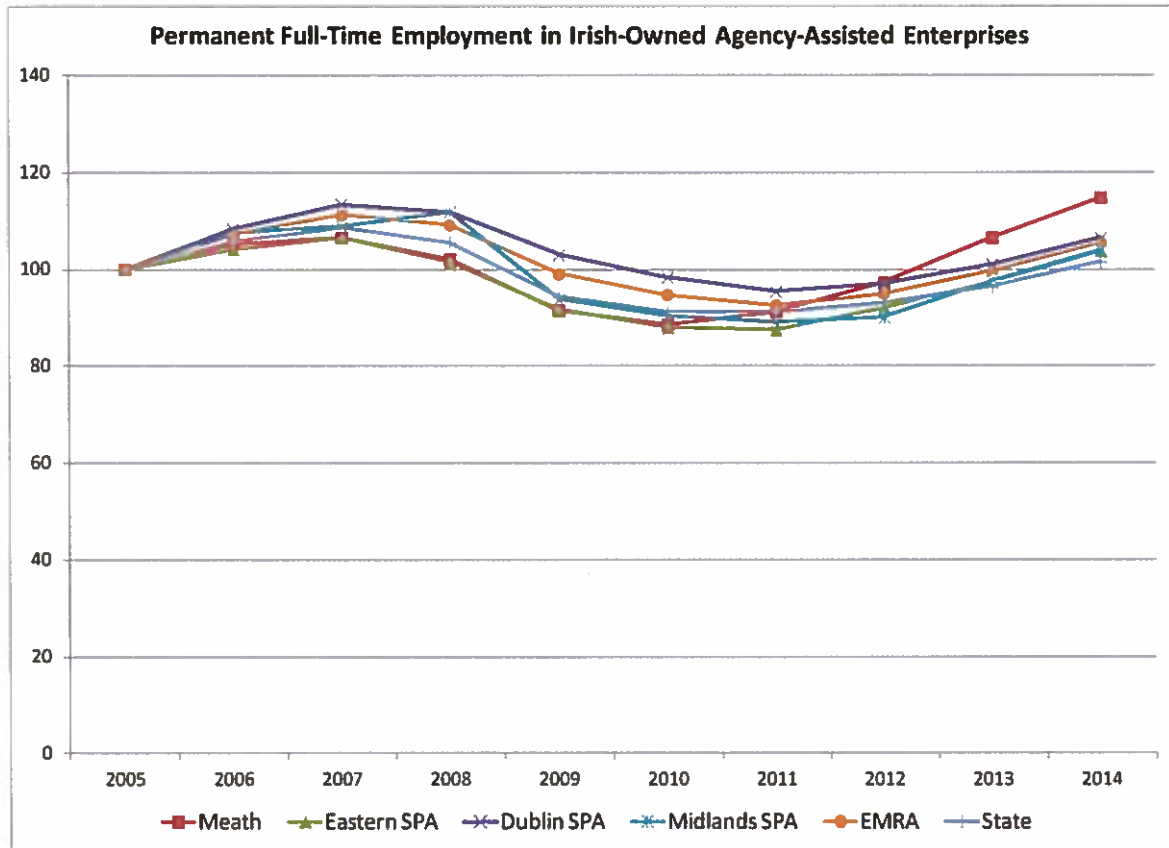
- ❖ *To facilitate more high-tech knowledge-oriented job opportunities within the County, while at the same time continuing to support existing enterprise employment – there is a discernible need to broaden the base of economic activity and employment within the County to ensure that the local economy is more competitive and sustainable*
- ❖ *To facilitate more employment opportunities closer to where people live – with the outbound commuters in mind, these people have the skills and work experience to help attract more FDI into the County, along with the fact that Meath’s favourable location next to the Dublin Region means that it can tap into a large and varied talent pool close to the County*
- ❖ *To meet these challenges, or opportunities, more effort needs to be expended into attracting greater FDI into the County*
- ❖ *Overall, the Economic Development Strategy set a total jobs target (among FDI and other employers) of 7,500 by 2022, which is both ambitious and achievable*
- ❖ *With lead responsibility for the implementation of the Economic Development Strategy, Meath County Council is working to facilitate the jobs target that has been independently and externally set for the County by 2022*
- ❖ *Dunboyne, along with five other economic centres in the County, has been identified as a key site for the targeted jobs growth for the County, which is basically to build on the FDI already in the County, which is highly valued, and the indigenous enterprise employment among the EI client, LEO client and other businesses based in the County (see Figure 4 below)*
- ❖ *The targeted activities/sectors for FDI and indigenous firms are consistent with what is already working in the County and with what can be realistically achieved in the County (the activities are also consistent with the Regional Action Plan for Jobs for the Mid-East Region 2015) (Figure 4).*

Table 2: Employment in County Meath and the State and Respective Compositions of Enterprise Ireland and IDA Ireland Client Employment (2011-2014)

Statistic/Variable	Employment within Meath				CAGR
	2011	2012	2013	2014	
Total Persons	38,822	38,719	37,932	39,605	0.7%
Agency-Assisted Enterprises					
Indigenous/Irish-Owned (EI)	4,583	4,883	5,353	5,765	7.9%
State	11.8%	12.6%	14.1%	14.6%	7.2%
Diff	7.7%	7.9%	8.0%	8.3%	2.4%
Diff	4.1%	4.7%	6.1%	6.3%	
Foreign-Owned (IDA)	1,204	1,206	1,229	1,245	1.1%
State	3.1%	3.1%	3.2%	3.1%	0.5%
Diff	7.7%	8.1%	8.1%	8.4%	2.9%
Diff	-4.6%	-5.0%	-4.9%	-5.3%	
All-Agency Assisted	5,787	6,089	6,582	7,010	6.6%
State	14.9%	15.7%	17.4%	17.7%	5.9%
Diff	15.4%	16.0%	16.2%	16.7%	2.6%
Diff	-0.5%	-0.3%	1.2%	1.0%	

Source: Total persons employed data from CSO (POWSCAR 2011 total persons in Meath) and Quarterly National Household Survey (QNHS) for the State 2011-2014, which has been used to estimate the employment levels in Meath during 2012-2014; the EI and IDA employment figures for Meath and the State are derived from data obtained from the DJEI.

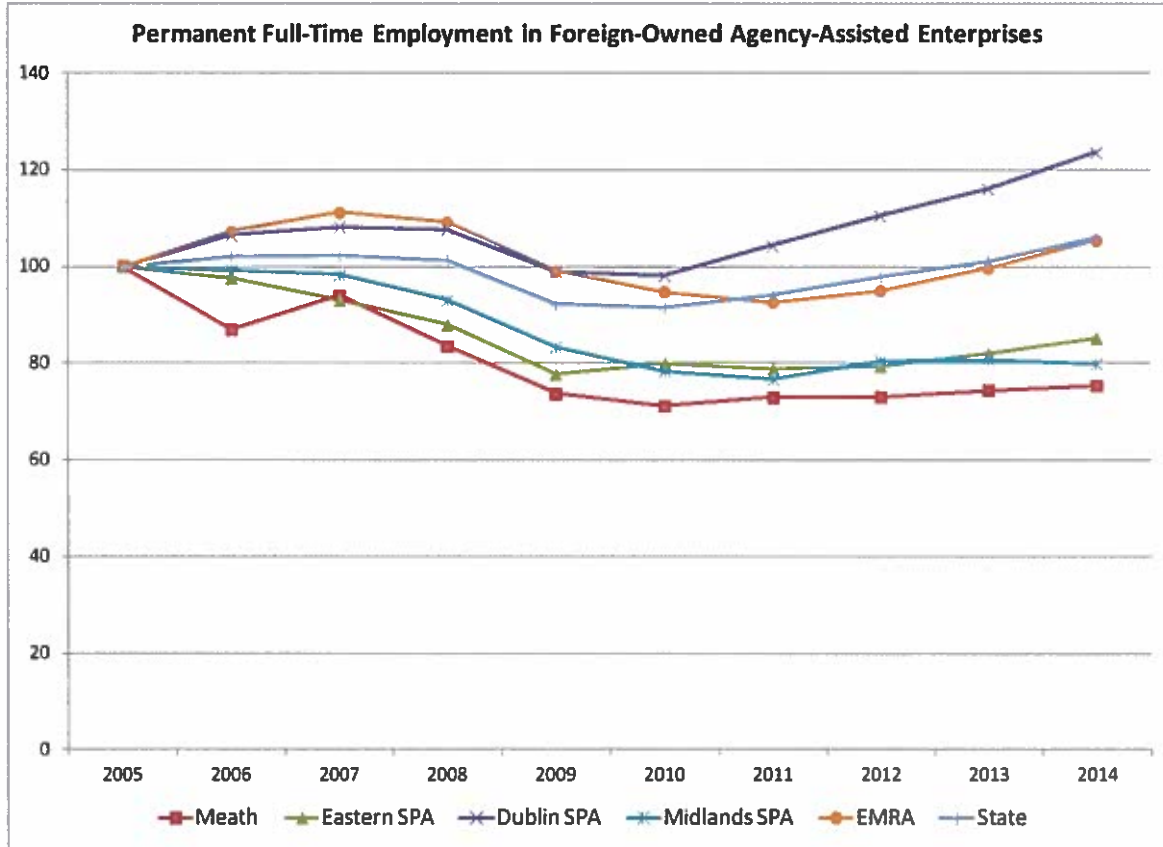
Figure 2: Permanent Full-Time Employment in Irish-Owned Agency-Assisted (Enterprise Ireland Client) Enterprises in County Meath, the EMRA Region and the State (2005-2014)



Source: Data obtained from the DJEI.

Note: Data presented in index number format to illustrate changes over the period, with the base year fixed at 2005 (=100).

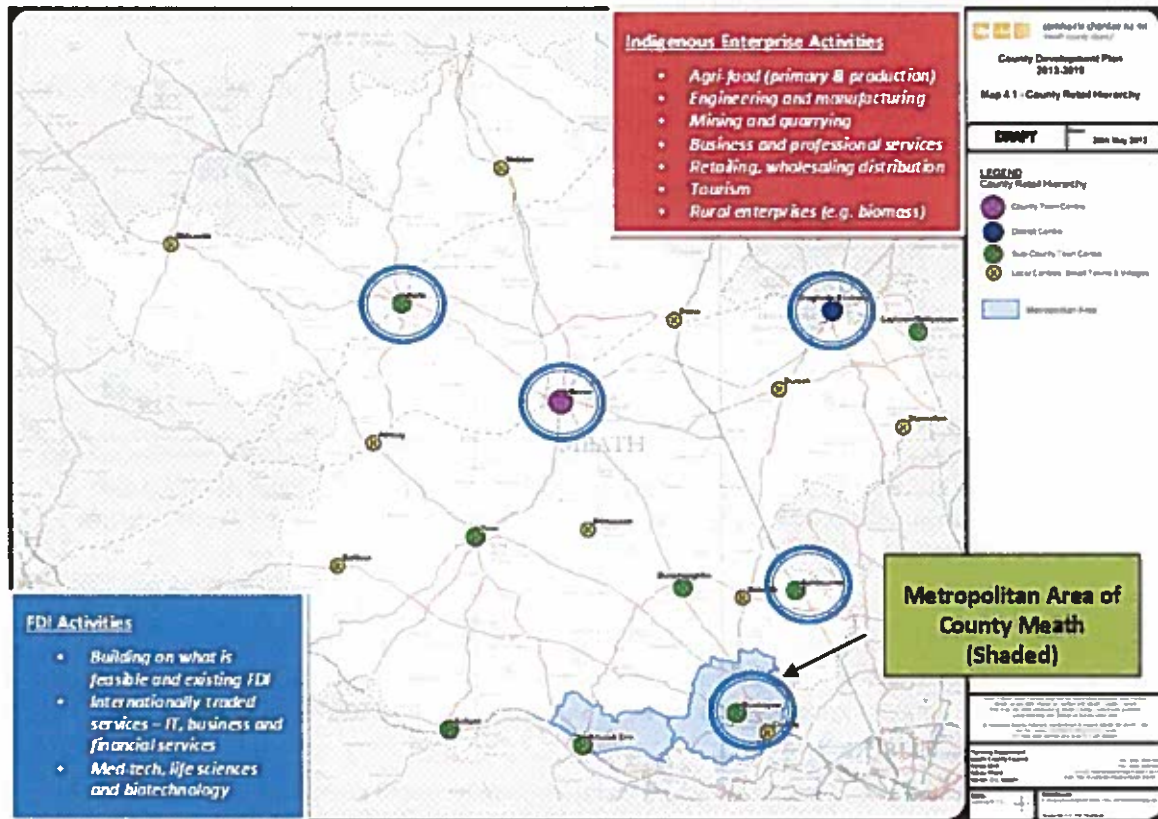
Figure 3: Permanent Full-Time Employment in Foreign-Owned Agency-Assisted (IDA Ireland Client) Enterprises in County Meath, the EMRA Region and the State (2005-2014)



Source: Data obtained from the DJEI.

Note: Data presented in index number format to illustrate changes over the period, with the base year fixed at 2005 (=100).

Figure 4: Map Illustrating the Targeted Sectors/Clusters and the Main Economic Centres in the Economic Development Strategy for County Meath 2014-2022



Source: Economic Development Strategy for County Meath 2014-2022.

Why Dunboyne North is Important to the Economic Development Strategy

Dunboyne encapsulates all the challenges, but also the opportunities, relating to economic development in County Meath. It has very high outbound commuting (as referred to above), where those living in the town and its environs have taken advantage of its favourable location and multi-modal transport infrastructure to work in Dublin, whereas the opposite pattern of commuting (i.e. into Dunboyne) has not been apparent.

Another way to see the extent of economic leakage from the area, and from County Meath as a whole (compared with the country as a whole), is to examine official data on both population and the number of jobs within the areas concerned, in the form of the jobs-to-population ratio. The analysis shown presently illustrates very strongly that the Dunboyne ED (Electoral Division), which includes Clonee and Pace, is characterised by a comparably low jobs/population ratio (within the ED), reflecting the extent of outward commuting from the area – and the same is also true of County Meath.

The facts have implications for the sustainability of funding to Meath County Council as well as economic development (the two are linked) and we return to the funding situation further below.

The table below provides an analysis of the jobs/population ratio in Dunboyne ED, County Meath and the State in 2006 and 2011 – the latest years for which the full facts are available (we also consider the preliminary data from Census 2016 below).

Table 3: Jobs-to-Population Ratio in Dunboyne Electoral Division (ED), County Meath and Ireland (2006 and 2011)

Analysis of Jobs-to-Population Ratio 2006-2011									
Location	Population			Employment within Location			Jobs/Population		
	2006	2011	% Change	2006	2011	% Change	2006	2011	% Change
State - Ireland	4,239,848	4,588,252	8.2%	2,054,000	1,849,000	-10.0%	0.48	0.40	-16.8%
County Meath	162,831	184,135	13.1%	33,176	38,822	17.0%	0.20	0.21	3.5%
Within County Meath									
Dunboyne ED	8,702	9,578	10.1%	2,267	2,510	10.7%	0.26	0.26	0.6%

Source: Population figures from the CSO; employment figures for County Meath and Dunboyne ED from the CSO POWSCAR 2006 (Place and Work Census of Anonymised Records) and POWSCAR 2011 (Place of Work, School or College Census of Anonymised Records); and employment figures for the State from the IMF World Economic Outlook (April 2016).

Between 2006 and 2011, the population of Ireland grew by 8.2% to reach almost 4.6m inhabitants in the latter year. At the same time, employment countrywide fell markedly by 10%, reflecting the severity of the recession from 2008. Accordingly, the job/population ratio fell from 48% in 2006 to 40% in 2011, a fall of 17%.

In County Meath, the rate of population growth was even more rapid compared with the country as a whole (13.1% versus 8.2%) (Meath had the second highest population growth in the State, after Fingal) and, despite the recession, employment within the County grew strongly during 2006-2011 by 17%. The most likely explanation for the jobs growth in Meath during this time was the gain in competitiveness following the recession, echoing in the strong performance of EI client company employment in the County as shown earlier in Figure 2 (p. 13). However, despite the strong growth in employment during the period, it is evident from the table above that the number of jobs relative to the population in Meath is very low (just 20% in 2006 and 21% in 2011, about half that in the country as a whole in 2011). In effect, the number of jobs within Meath is about the same as other counties having much lower populations. The very low jobs/population ratio in Meath in turn reflects the high outbound commuting from the County, which has various ramifications for the local economy and local communities, and for the funding sustainability of Meath County Council itself, to which we turn further below.

In Dunboyne ED, the jobs/population ratio was just 26% in 2006 and 2011, much lower than the State.

The high leakage of economic activity from Meath in general, and from Dunboyne in particular, highlights the need to address the leakage because the area benefits from a wide range of comparative advantages (including favourable location, transport infrastructure, skills and talent, and strong existing businesses) that would enable more investment and more employment to be created within the County, contributing in turn to the sustainable development of the County. This is precisely the aim of Variation No. 3 – to realise the economic development potential of Dunboyne and the County as a whole.

The next table below provides estimates of the jobs/population ratio in Dunboyne ED and County Meath for 2016, using the Census 2016 preliminary estimates (for the population only – the employment figures for the Dunboyne ED and County Meath have been estimated by assuming that the respective employment growth rates during 2006-2011 carry over to 2011-2016, while the employment figure for the State is from the IMF).

Even assuming the high employment growth rate of 10.7% during 2011-2016 (as observed in fact during 2006-2011), the jobs/population ratio in Dunboyne ED in 2016 would still only be 28%, versus 42% for the country as a whole (and similarly the ratio for Meath in 2016 would be only 23%, even assuming 17% employment growth during 2011-2016).

The estimates illustrate the task at hand for Meath County Council in seeking to support employment growth in the County and in strategically important locations like Dunboyne now and in the years to come. It is estimated that it would take an additional 1,740 jobs since 2011 to bring the jobs/population ratio in Dunboyne ED from the 26% factual figure observed in 2006 to 42% in 2016 (the same proportion as the State).

When the full facts of Census 2016 come to light next year, including the fact on employment within EDs, it is expected that the jobs/population ratio in Dunboyne ED and in other parts of Meath will continue to be well below that in the country as a whole in 2016. However, given the Facebook, Shire and Avoca investments, and possibly the Aramark investment in the lands in Dunboyne, it is possible that by 2021 (the next Census year after 2016) Dunboyne ED will be on par or approximately the same as the State and the same will be true of other parts of the County – the Economic Development Strategy set a target of 7,500 additional jobs to be created in Meath from 2011 (the base year) to 2022, and Meath County Council are committed to achieving or exceeding this externally set target.

Table 4: Estimated Jobs-to-Population Ratio in Dunboyne Electoral Division (ED), County Meath and Ireland (2011 and 2016)

Analysis of Jobs-to-Population Ratio 2011-2016									
Location	Population			Employment within Location			Jobs/Population		
	2011	2016 (e)	% Change	2011	2016 (e)	% Change	2011	2016 (e)	% Change
State - Ireland	4,588,252	4,757,976	3.7%	1,849,000	2,003,000	8.3%	0.40	0.42	4.5%
County Meath	184,135	194,942	5.9%	38,822	45,429	17.0%	0.21	0.23	10.5%
Within County Meath									
Dunboyne ED	9,578	10,072	5.2%	2,510	2,779	10.7%	0.26	0.28	5.3%

Source: Population figures from the CSO (preliminary estimates 2016); employment figures for County Meath and Dunboyne ED assume that the rate of growth in employment during 2011-2016 is the same as that during 2006-2011; and employment figures for the State from the IMF World Economic Outlook (April 2016).

The Aramark submission highlights its requirements in respect of identifying a suitable and competitive location, such as proximity to Dublin, mix of uses for staff and customers, accessibility and transport links etc. – all of which the lands at Dunboyne North possesses.

In addition to these are the talent pool (locally in Dunboyne as well as in Dublin Region – over 40% of those at work in Dunboyne settlement have third-level or higher educational attainment), the demographic structure of the population and the availability of housing locally – the National Competitiveness Council has recently highlighted the importance of affordable housing supply in the mix of activities that will make Ireland more attractive to inward investment (footnote 1 above).

PMCA notes that the Statement of Reasons accompanying the Draft Direction mentions that it would be inappropriate to develop outside of Dunboyne, in the lands under consideration. However, this view ignores the revealed preference of the marketplace – what investors see as prime, competitive location – and the new investments outlined here clearly demonstrate the economic and employment potential of the area, and the positives of a ‘work-and-live’ environment, which is clearly attractive to investors, at a time when accommodation has become even more important in the mix of competitiveness criteria.

Importance of the Economic Development Strategy for the Sustenance of Local Government in County Meath

The sustainability of the past model of development in County Meath has been called into question in funding submissions made by Meath County Council to the Department of the Environment, Community and Local Government as well as by the external consultants who put together the Economic Development Strategy for County Meath 2014-2022. The most recent submission – the Funding Submission by Meath County Council to the Department (17 July 2015) – highlighted the fact that the Council has been faced with an exceptionally rapid rise in its population but without an appropriate increase in the level of resources required to service the population.

It is relevant to highlight this central issue in the context of Variation No. 3 because it further illustrates the need to promote economic development and employment within the County. Among the strategic economic centres that the consultants have identified in the Economic Development Strategy, Dunboyne is among the most attractive in the County, by virtue of its location, its public transport infrastructure, its serviced sites for employment development (the economic development lands under consideration have been zoned for such development since 2009) and, notably, the recent interest from new investors.

In regard to the cause of the funding problem faced by Meath County Council, the population of Meath increased extremely rapidly over the 1996-2011 period. Over the 19 years, the population in the county increased by 68% or 74,403, up from 109,732 to 184,135. The rate of growth in the population was two-three times that experienced in most other counties and was two-and-a-half times that experienced in the State as a whole.

However, as shown in the aforementioned latest funding submission to the Department, Meath County Council has been allocated the 28th lowest level of government grants and the 20th lowest level of property tax in the country. Compounding the problem is that locally generated income, such as commercial rates, has not been able to grow at the same pace as the population growth. As a result Meath has the lowest level of expenditure per capita of any county.

The low commercial rates base-relative-to-population in Meath is not due to a low rate on valuation; Meath ranked in the top one-third in terms of its rate on valuation in 2015. Rather, Meath's low commercial rates base per capita reflects the low number of firms in the county relative to its population (which also explains in part the low jobs/population ratio in the County, as shown above). Meath has a low ratio of firms-to-population because it has operated largely as a 'commuter belt' county in respect of the capital since the 1990s, when national economic growth began to escalate. The funding base (i.e. the number of firms) available to Meath County Council is very low relative to the population to which local authorities have to provide services. Therefore, the county has had very low levels of commercial rates available to provide services to the large number of houses in the county. However, this is now being addressed through the objectives outlined within the Economic Development Strategy for County Meath 2014-2022, and this further underscores the critical importance of giving effect to the Economic Development Strategy *via* Variation No. 3.

Concluding Remarks

Variation No. 3 of the Meath CDP 2013-2019 is of critical importance to realising the sustainable economic development of County Meath and is based on extensive and robust empirical evidence, as set out in detail in the Economic Development Strategy for County Meath 2014-2022.

PMCA considers that it is relevant to, and consistent with, the regional and national policy contexts. Variation No. 3 is also based on a plan-led approach to sustainable development: it identifies and anticipates future needs to ensuring that the right kind of development happens in the right places and at the right time; it also seeks to co-ordinate public and private sector activity to support the conditions where investment and job creation can flourish; and the intended delivery of Variation No. 3 brings together the key sectors of community, employment, housing, infrastructure and the environment.

Variation No. 3 also aims to ensure more even economic recovery, outside of the capital – in a county that has experienced very high, and unsustainable, rates of outbound commuting and economic leakage over many years.

The area under consideration in Dunboyne North benefits from the following attributes:

- *Infrastructure* – including rail and other public transport infrastructure to support economic and employment development.
- *Intellectual and policy machinery* – in the forms of the Economic Development Strategy and the backing of the Meath Economic SPC and the Meath LCDC, and the Meath Economic Forum.
- *Strategic planning* – with the identification of five key strategic sites within the County that will drive economic development throughout the County (Dunboyne being one of the identified sites).
- *Availability of serviced, zoned sites* – including the lands under consideration.
- *Clear evidence of investor interest* – through recent IDA Ireland jobs announcements and the prospect of a major new IDA investment by Aramark in the said lands.

APPENDIX I

TRANSPORTATION CONTEXT REPORT

JULY 2016

Project: Dunboyne/Pace/Clonee
Subject: Transport Planning Advisory Note

1. Introduction

AECOM has been requested by Meath County Council (MCC) to prepare a note in relation to the transport impact of the proposed development of the Dunboyne / Clonee / Pace corridor (“the Dunboyne area”) in Co. Meath. This note will:

- Provide an overview of the work we are currently undertaking on behalf of MCC in relation to the Dunboyne area. AECOM were commissioned in May 2016 to assist MCC in developing a transport strategy to respond to proposed land use changes in the area including a variation to the zoning at Pace. This work is ongoing and is due to be completed in September/October 2016;
- Provide an overview of the existing traffic and transport situation in Dunboyne and how it might evolve in the future to respond to development proposals together with the outline of how a multi modal transport strategy (to cater for increased transport demand) has been, and will continue to be, developed based on our professional opinion and knowledge of previous studies; and
- Provide advice on how any differences in traffic generation could be mitigated against through sustainable travel design and parking standards.

2. Ongoing Transport Assessment

2.1 Ongoing Tasks

As outlined above, in May 2016 AECOM were commissioned to assist Meath County Council in developing a transport strategy to respond to proposed land use plans for the area including a variation to the zoning at Pace. This exercise will involve the use of the National Transport Authorities (NTA) ERM model to ascertain future mode splits and uptake in the use of public transport in the area along with the development of a detailed VISUM highway model which will be used to assess the impacts of development proposals on the road network. The exercise will provide commentary on where there are outstanding congestion issues, and should there be outstanding issues, provide recommendations on where the land use proposals could be revised to minimise any potential congestion issues and better ensure the successful development of the area. The deliverable from this task will be a findings report outlining the impact of the final land use forecasts on the road network, the potential mode share that could be achieved in Dunboyne with this land use plan in place and a suite of recommendations with regard to the required improvements to the public transport and road network. The findings report is expected to be completed in September/October 2016.

3. Potential Considerations and Mitigation

A number of traffic and transport related considerations and potential mitigation measures to ease future congestion are outlined below.

Sustainable Travel

- The delivery of the Dunboyne Rail Line involved the development of 7.5km of railway, branching off the Maynooth line at Clonsilla and terminating at the M3 interchange at Pace. The M3 Parkway station (which includes a 1,200 space car park facility) is underperforming in its current function as a station serving the north Dunboyne/Pace area and as a park and

ride with in the region of 200 daily passengers using the station in 2014¹. The construction of a rail-focused development hub surrounding the station would help to boost patronage. The addition of a service centre close to the station could also encourage greater park and ride behaviour e.g. combination of rail and crèche facilities.

- **Parking Standards** – The level of parking provided within the site for employees/visitors will significantly affect the car demand and reduced parking provision could be used to encourage sustainable travel.
- The M3 Parkway site could become the key point on a greenway corridor linking the Pace area to Dunboyne town in the south for schools/services and to new employment sites in the east such as Facebook etc.
- A Sustainable Travel Access & Movement Strategy should be developed which would use existing data and spatial planning techniques to inform a walking, cycling and public transport access strategy for the area. This strategy could then be made available to ensure future development in the area takes cognisance of the overall strategy for the area in this regard ensuring attractive linkages for walking and cycling are provided within the site, to local destinations and to local public transport services.
- As set out in the NTA’s Transport Strategy for the Greater Dublin Area 2016 – 2035, it is proposed to extend the DART to Maynooth by electrifying the Maynooth line and by removing the level crossings. There are also long term ambitions to deliver the DART Expansion Programme and DART Underground which could lead to improved services to Dunboyne and Pace.

National Roads

- As set out in the Transport Strategy for the Greater Dublin Area 2016 – 2035, “*Widening of the N3 between Junction 1 (M50) and Junction 4 (Clonee), plus related junction and necessary changes to the existing National Road network*” is listed as part of the enhancement works planned for the National Road network. TII are developing plans to provide additional capacity on the N3, between Clonee and the M50, through additional lanes and junction upgrades however additional capacity alone will not adequately protect the asset into the future. Demand management measures on the National Road corridor and associated delivery of public transport services and the promotion of sustainable travel are key to ensuring the long term development plans of the N2/M3 corridor are sustainable.
- Previous work in the area has identified a number of potential interventions which may improve performance of the road network in the area as listed below. The ongoing transport assessment task will revisit these interventions and identify the optimum transport network to respond to the proposed future land use proposals.
 - Continued investment and improvements in the rail and bus services to the Dunboyne Area;
 - Facilitate the upgrade of the Clonee interchange on the M3;
 - Enhancement of the M3 Pace Interchange to facilitate future increases in traffic flow through this interchange from Ratoath and Dunshaughlin, and to support potential future increases in traffic flow from the M3;
 - Upgrade of the Black Bull roundabout;
 - Improvements to the Dunboyne Eastern Distributor Road, connecting the Old Navan Road with Station Road and forming a local bypass of the town centre for traffic to/from the Dunboyne Northern Environs;

¹ Irish Rail Census 2014

Technical Note

- A new connection from Dunboyne Business Park to the Dunboyne Western Bypass; and
 - The upgrade of the Rooske Road/Station Road junction.
- A key issue in the area is the impact of toll avoidance trips on the operation of the Blackbull and Pace junctions. In the AM peak there are currently 1,400 vehicles travelling southbound on the M3 north of Pace, i.e. tolled vehicles, whilst the R147 south of the Blackbull junction carries some 1,200 vehicles southbound, a large proportion of which should be on the M3. Surveys undertaken in 2016 suggest that in the AM peak 38% of this traffic comes from the direction of Dunshaughlin, 29% from Trim and 33% from Ratoath. This situation is repeated in the PM peak where 1,300 vehicles travel northbound on the M3 north of Pace whilst nearly 1,350 vehicles travel northbound on the R147 south of Blackbull. The below figures highlight the congestion issues being experienced along these routes whilst the M3 mainline is relatively freeflow. This diversion traffic is contributing significantly to the issues experienced at the Pace and Blackbull junctions and could potentially be resolved through a combination of traffic signals and traffic management measures.



Figure 1 - AM Peak – Typical Delays – Google Live

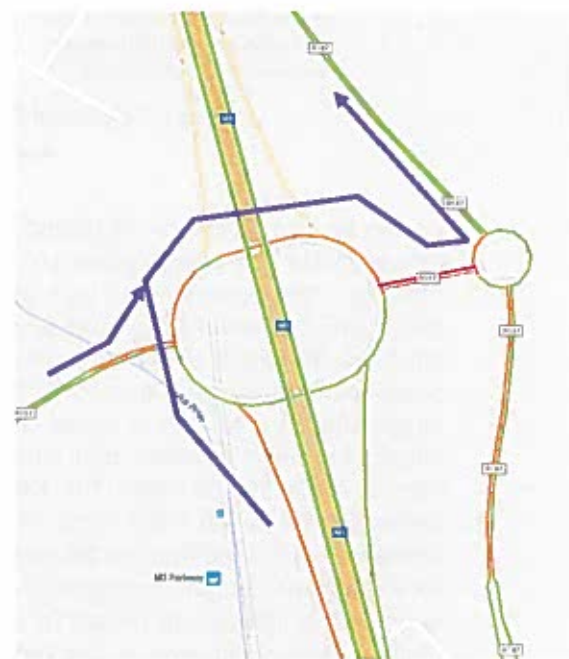


Figure 2 - PM Peak – Typical Delays – Google Live

- The M3 motorway was officially opened to traffic in June 2010. It provides a strategic link between Dublin and the north-west region. The scheme bypasses Dunshaughlin, Navan and Kells and also includes connections to Clonee and Dunboyne. The historic flow on the M3 adjacent to the Pace interchange is presented below based on information extracted from TII's Traffic Monitoring Units.

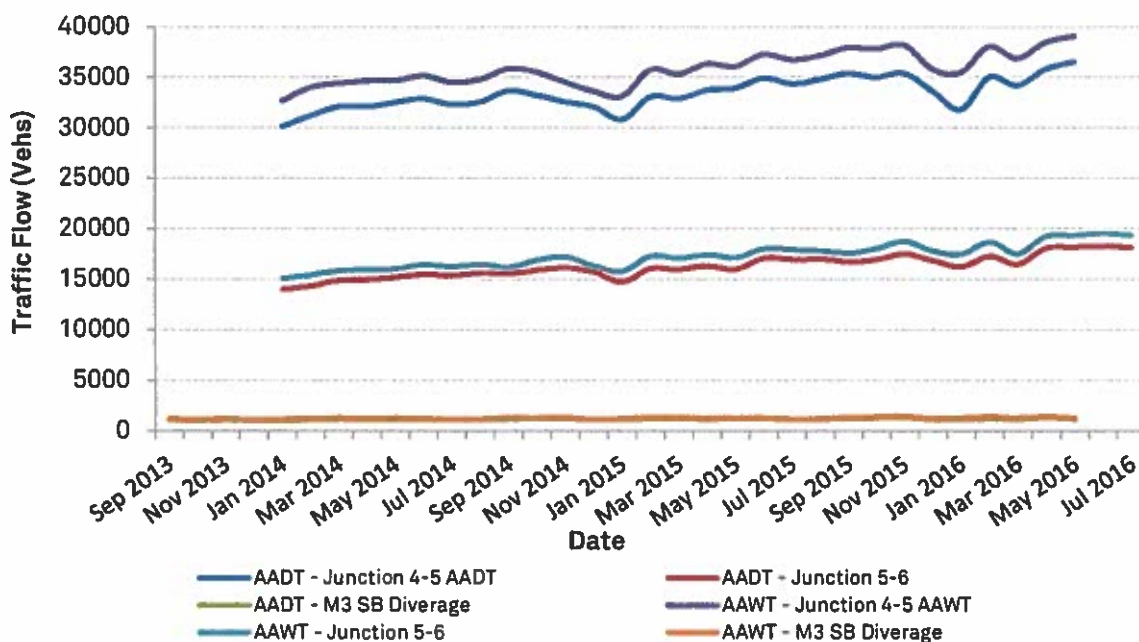


Figure 1 – Historical Traffic Flow on the M3 – AADT/AAWT

Source: TII Traffic Counters

As can be seen above the M3 south of Pace has experienced growth of 5% per annum since January 2014 with overall growth of 10% between 2014 and 2016. North of Pace the increase has been more pronounced with growth of 8-10% per annum and overall growth of 18% since 2014 however AADT/AAWT flows are significantly lower than those experienced further south on the M3. It should be noted however that this growth is significantly lower on the southbound diverge to the north of Pace which has only experienced 10% in the same period suggesting that growth in north Dunboyne has been slower than areas further south. It should be noted however that whilst the M3 south of Pace (2 lanes plus Auxiliary lane) carries some 36,500 AADT, the N3 south of Clonee (2 lanes) carries some 53,000 AADT increasing to 96,000 AADT north of the M50 Interchange (2 lanes plus Auxiliary lane). It is therefore concluded that the M3 mainline north of Parslickstown has spare capacity to cater for significant demand increases however the junctions of Clonee and Pace would require upgrades in addition to Fingal/TII plans to provide an additional lane on the N3 south of Clonee. This conclusion is backed up through the information presented below which presents daily traffic flow by hour on the M3 south of Pace for the month of April 2016 together with the practical capacity of the road based on previous research by TII² which found that the Practical Capacity of an unmanaged lane in a traffic stream can be defined at between 1,800 and 1,850 Passenger Car Unit's (PCU) per lane per hour (equates to approximately 1,700 vehicles/lane/hour).

² A Study of Lane Capacity in the Greater Dublin Area: TII: February 2012

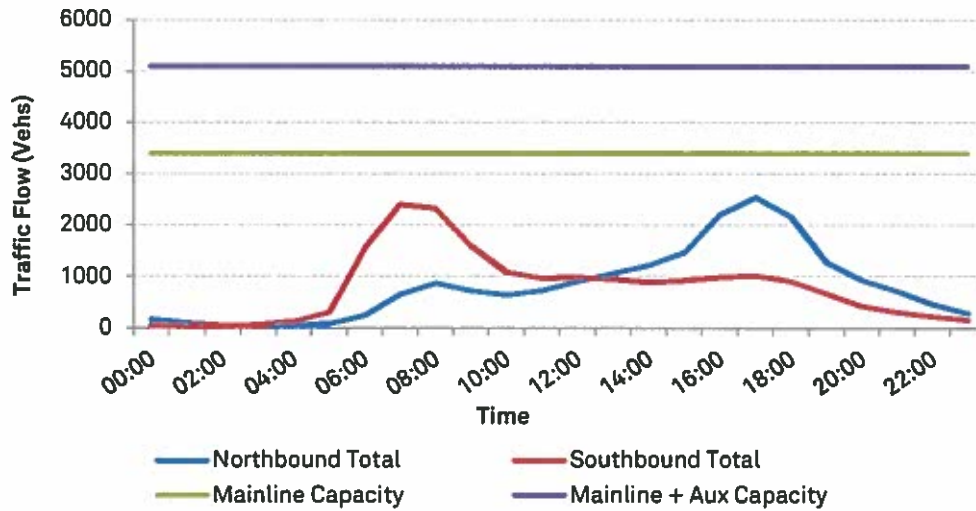


Figure 2 – Historical Traffic Flow on the M3 – Hourly Flow
Source: TII Traffic Counters

As outlined above the current peak hour flows on the M3 mainline are significantly lower than the safe operational capacity, suggesting that spare capacity exists on the mainline and the existing congestion issues are largely due to the operation of the junctions or downstream issues. The below data reinforces the point with between 60-85% of traffic throughout the day being catered for by the middle lane only which decreases to 45% during the AM peak.

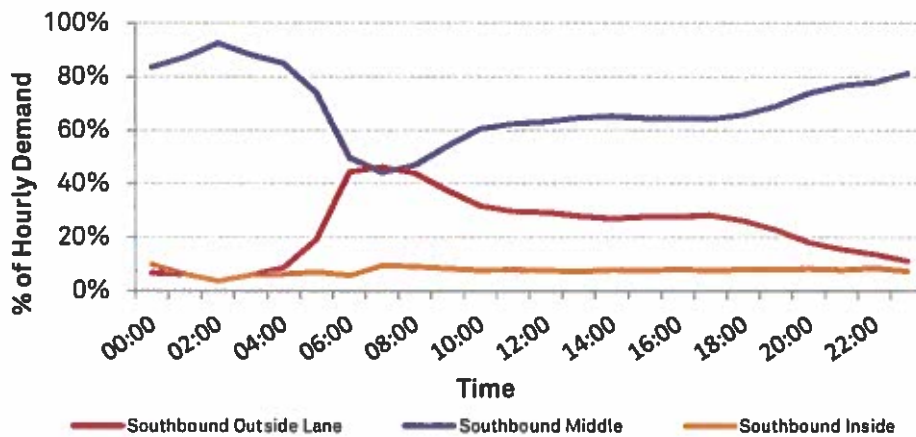


Figure 3 – Lane Utilisation on the M3 south of Pace – April 2016 Data - Southbound
Source: TII Traffic Counters

The below graph represents the lane utilisation patterns of northbound traffic on the M3 to the south of Pace. A vastly different profile is evident due to the significant proportion of M3 northbound traffic which exits at the Pace interchange across the day. As outlined above large proportion of this traffic would appear to be avoiding the upstream toll on the M3.

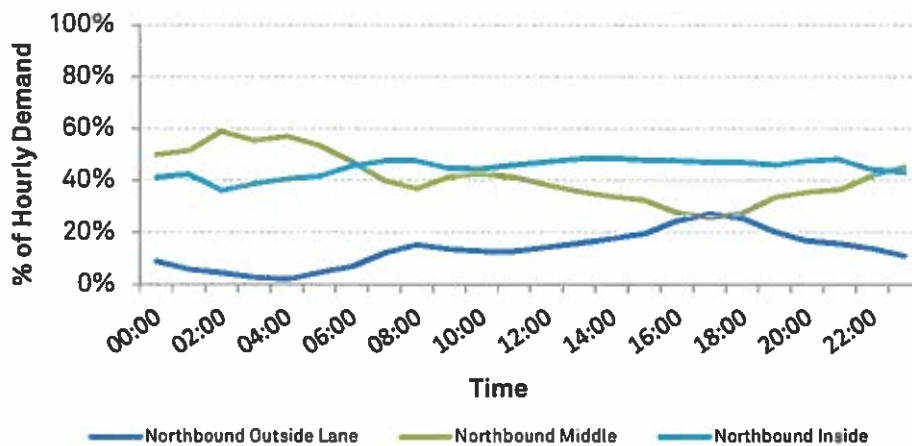


Figure 4 – Lane Utilisation on the M3 south of Pace – April 2016 Data - Northbound
Source: TII Traffic Counters

4. Summary

A summary is provided below;

- Significant evidence based work has been undertaken in the past to assess the transport impacts and requirements for the Dunboyne area with future development proposals in place. Ongoing work, commissioned by Meath County Council, will continue this process through the development of an up to date 2016 VISUM model to assess road based issues and interventions and through the use of the NTA’s ERM Model to assess and inform a public transport and sustainable travel strategy.
- Previous transport assessments have concluded that a number of road infrastructure improvements are required to cater for future demand including upgrades to both the Clonee and Pace interchanges and various local schemes such as the Dunboyne Eastern Bypass. This process will be revisited as part of the ongoing task with Meath County Council to ensure the transport strategy remains valid and represents the optimum road network to cater for future travel demand and patterns.
- In solely transport terms, the Dunboyne and Pace areas are well suited for future development through their location adjacent to the National Road and public transport networks and accessibility to strategic infrastructure such as Dublin Airport.
- The M3 Parkway rail station is currently significantly under-utilised. Development adjacent to the station with attractive walking and cycling linkages would result in increased patronage at the station and improved PT mode share for the area.
- A Sustainable Travel Access & Movement Strategy would be a valuable tool to ensure future development in the area takes cognisance of the overall strategy for the area in this regard ensuring attractive linkages for walking and cycling are provided within the site, to local destinations and to local public transport services.
- The key existing issue is the performance of the Pace junction which is currently experiencing significant congestion in the peak traffic hours. Potential mitigation measures will be assessed as part of the ongoing task however it should be noted that a significant proportion of the congestion issues arise mainly due to toll avoidance as opposed to other local issues. The M3 mainline operates well below capacity both north and south of Pace.

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APPENDIX J
SERVICES CONTEXT REPORT
JULY 2016



Meath County Council
Water Services,
Units 41-42,
Navan Enterprise Centre,
Trim Road, Navan,
Co. Meath

WATER SERVICES STATUS REPORT

Lands adjacent to M3 Parkway, Pace, Dunboyne

27/07/2016

The following note refers to lands which are identified as 'Dunboyne North OBJ1 & OBJ2' in Variation No.3 amendments to the Meath County Development Plan 2013-2019

The subject lands are subject to A2 and E1/E3 zoning in the said development plan and comprise of approximately 200 acres.

The total demand associated with the full development of this site is of the order of 960m³/day for both water supply and wastewater treatment & disposal.

The subject lands are not currently serviced, however they have been identified within the Economic Development Strategy for Co. Meath as a key strategic site for Economic Development.

WATER SUPPLY

Irish Water has recently committed to the delivery of a large diameter watermain to serve the E2 zoned lands to the north of the M3 Parkway. The likely route for this water supply infrastructure shall be along the R147 Regional road to the east of the M3 motorway. The proposer of any development on the 'Dunboyne North OBJ1 & OBJ2' lands can make an application to Irish Water for a connection from this trunk main to service the site.

It is imperative that those with an interest in the 'Dunboyne North OBJ1 & OBJ2' lands be advised to engage with Irish Water at the earliest to ensure that any design for the watermain extension takes account of the demand associated with the development of those lands.

WASTEWATER DRAINAGE

The closest public wastewater collection network to the lands which has a sufficient capacity to accept wastewater from the development of the lands is located in Dunboyne village, approximately 2km away via public roads.

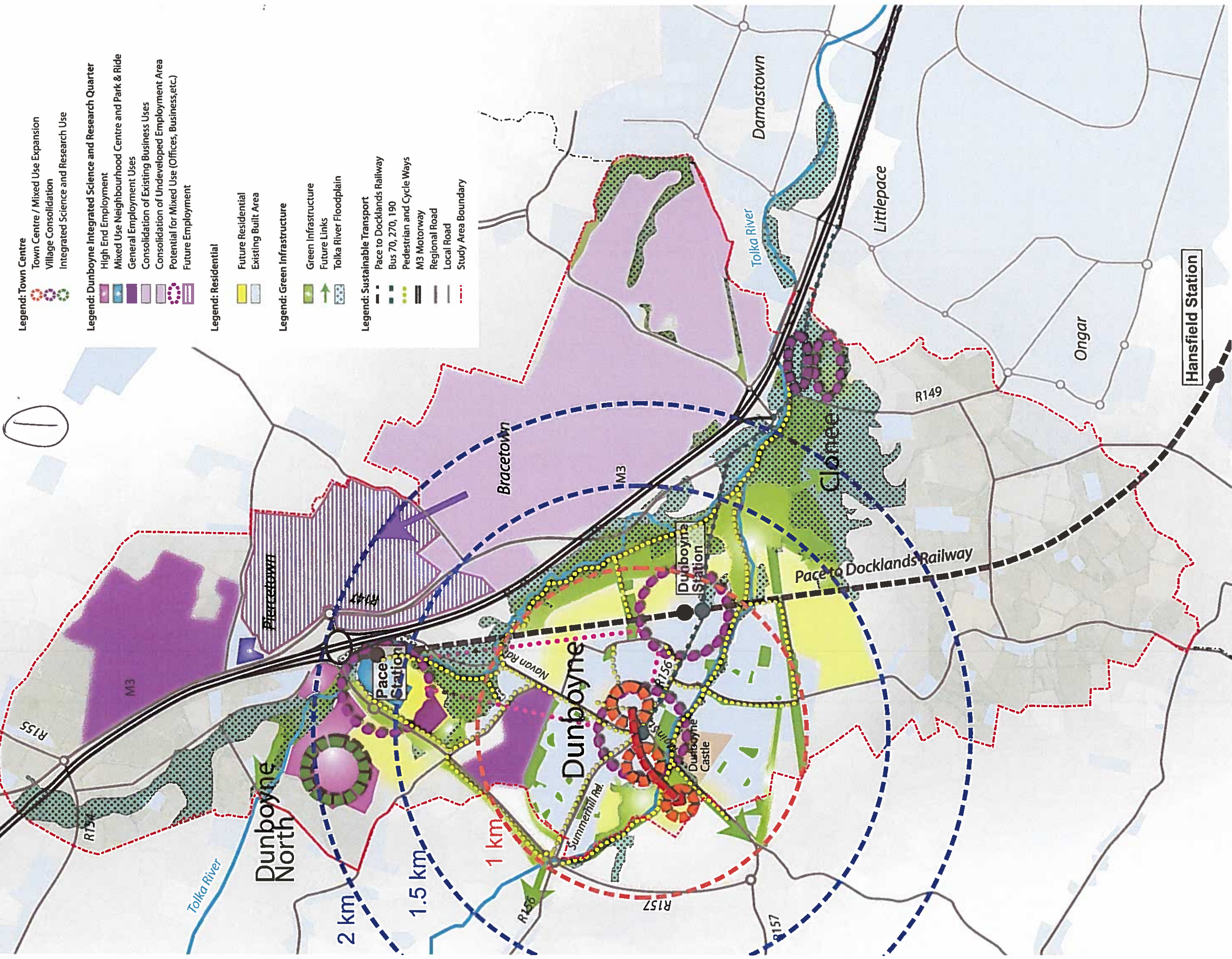
Owing to the relatively flat topography of the area, it is unlikely that a gravity sewer connection from the subject lands to Dunboyne will be possible but a pumping station and rising main connection would be appropriate.

The site of a single wastewater pumping station to serve the entire lands would need to be carefully chosen to provide optimum coverage to entire site.

The route of the rising main and its connection point to the existing network would also need to be carefully considered and agreed with Irish Water.

SCHEDULE OF MAPS

DUNBOYNE CLONEE PACE CORRIDOR OVERALL GROWTH PRINCIPLES



Legend: Town Centre

- Town Centre / Mixed Use Expansion
- Village Consolidation
- Integrated Science and Research Use

Legend: Dunboyne Integrated Science and Research Quarter

- High End Employment
- Mixed Use Neighbourhood Centre and Park & Ride
- General Employment Uses
- Consolidation of Existing Business Uses
- Consolidation of Undeveloped Employment Area
- Potential for Mixed Use (Offices, Business, etc.)
- Future Employment

Legend: Residential

- Future Residential
- Existing Built Area

Legend: Green Infrastructure

- Green Infrastructure
- Future Links
- Tolka River Floodplain

Legend: Sustainable Transport

- Pace to Docklands Railway
- Bus 70, 270, 190
- Pedestrian and Cycle Ways
- M3 Motorway
- Regional Road
- Local Road
- Study Area Boundary

Hansfield Station



Dunboyne North

2 km

1.5 km

1 km

Dunboyne

Summerhill Rd.

Dunboyne Castle

Dunboyne Station

Pace to Docklands Railway

Clonee

Tolka River

Damastown

Littlepace

Ongar

R149

R155

R154

M3

Piercetown

R147

Navan Rd.

R156

R157

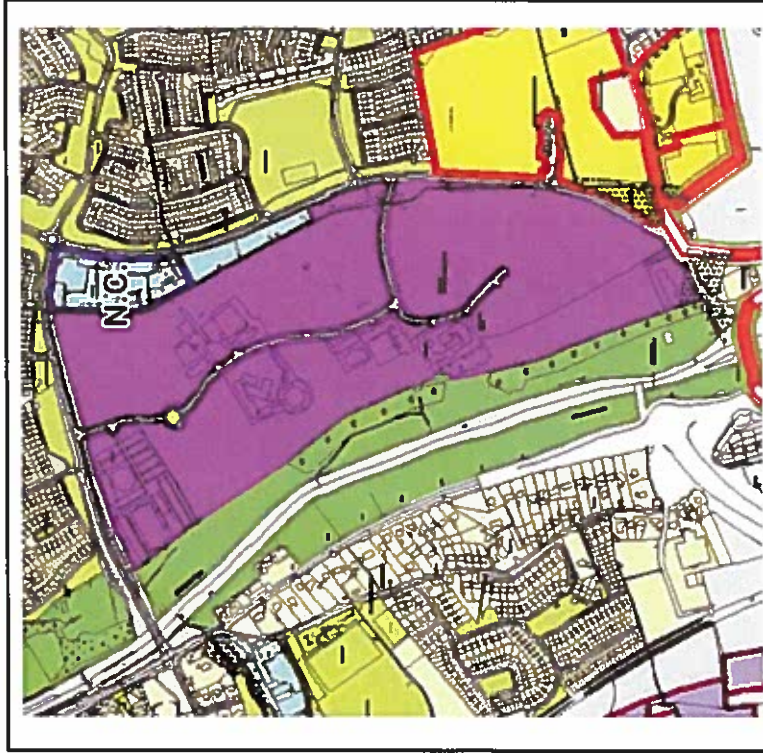
R157

M3

Bracetown

2

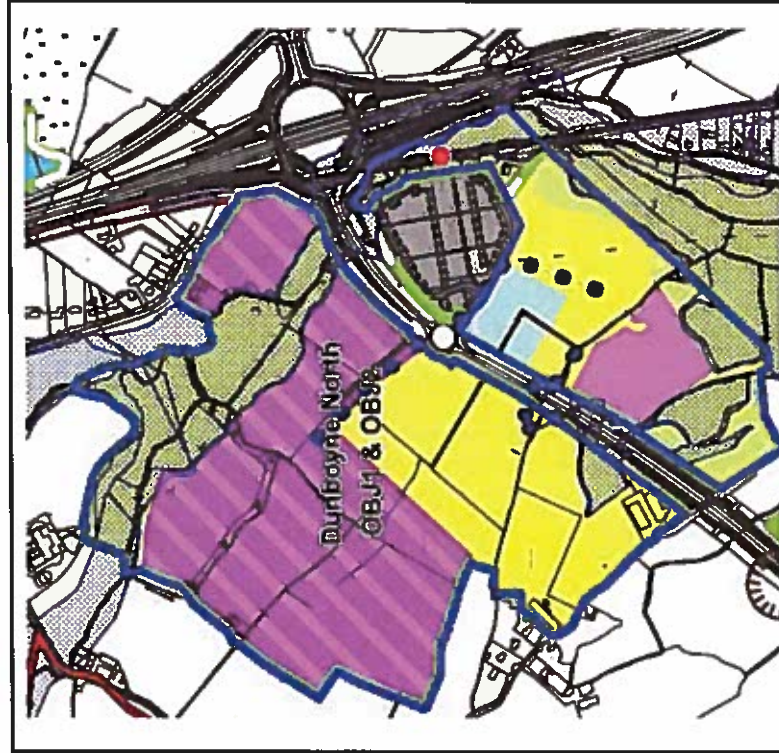
STRATEGIC EMPLOYMENT SITES MAP



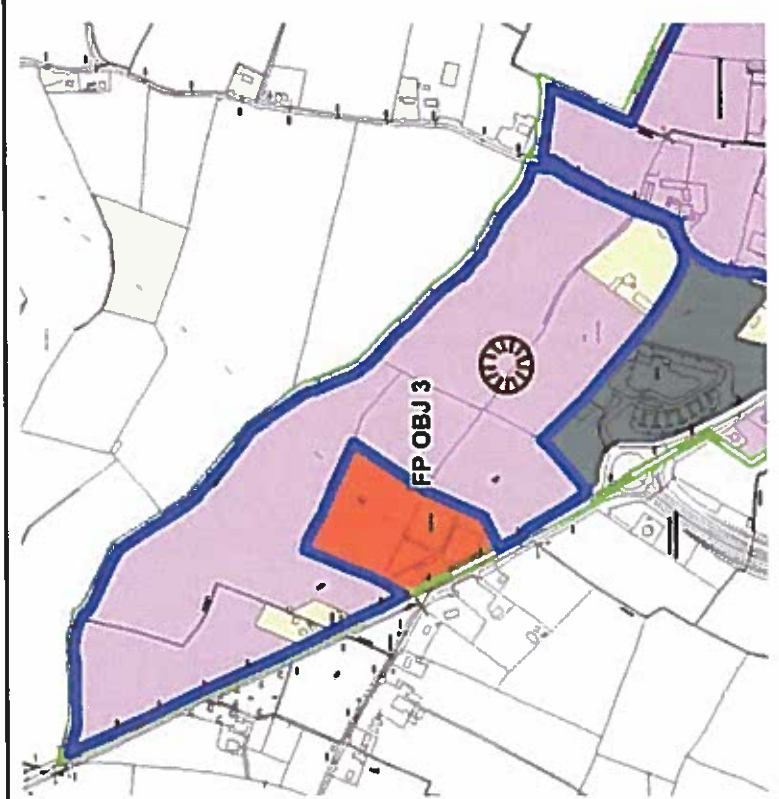
Navan I.D.A. Business and Technology Park



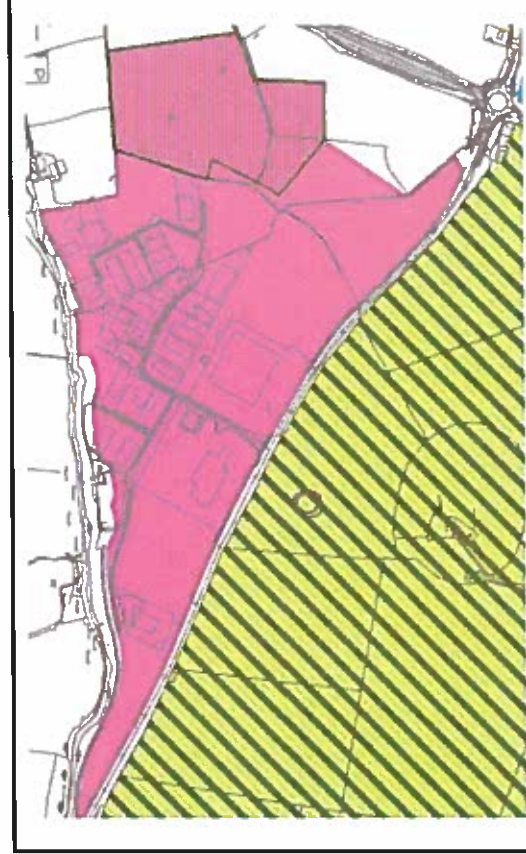
South Drogheda I.D.A Business and Technology Park and adjoining lands in Private ownership



Dunboyne North (Lands adjacent to the M3 Parkway Rail Head)










Ashbourne (Lands North of the Rath Roundabout)

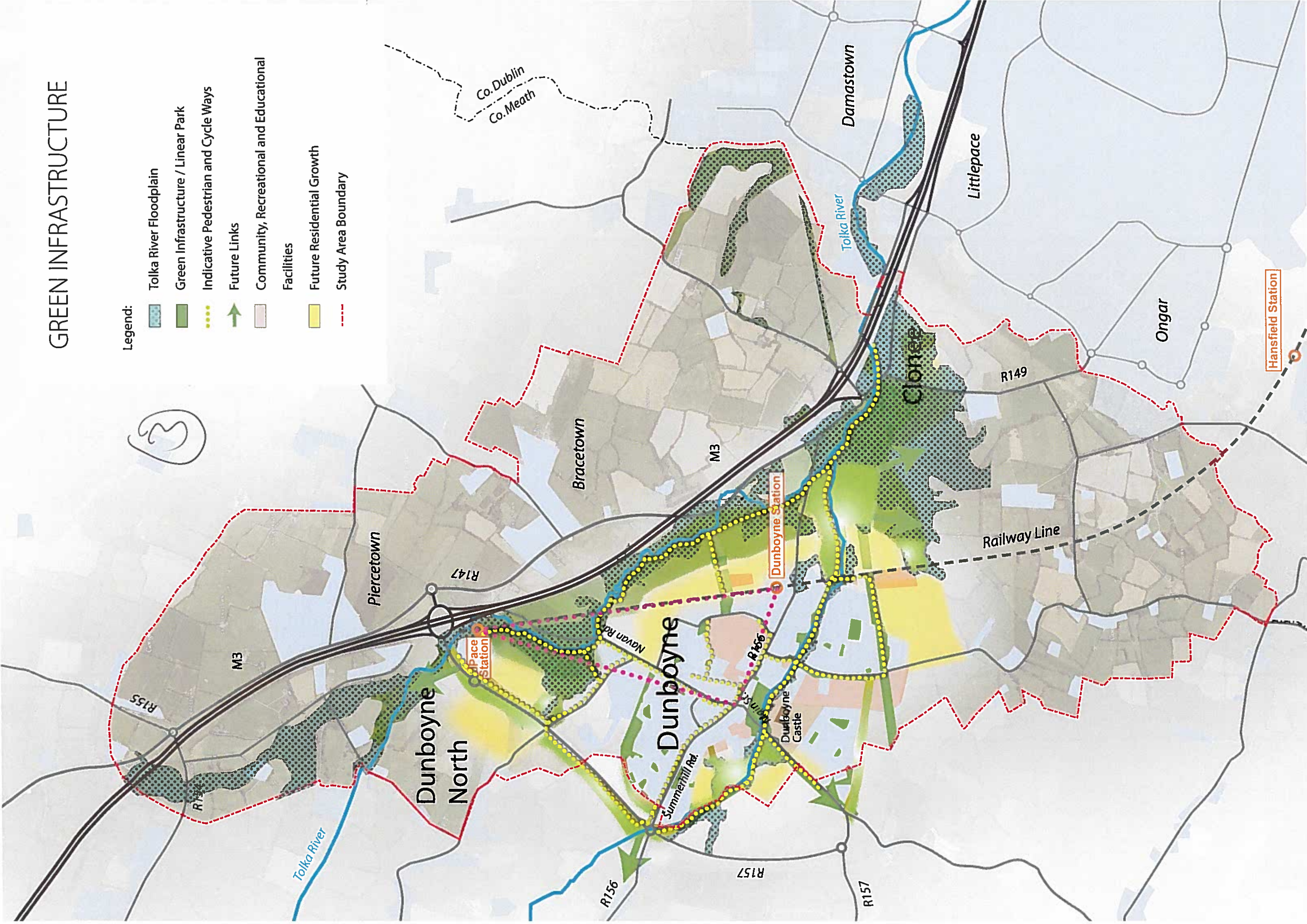


Kells Business Park

GREEN INFRASTRUCTURE

Legend:

-  Tolka River Floodplain
-  Green Infrastructure / Linear Park
-  Indicative Pedestrian and Cycle Ways
-  Future Links
-  Community, Recreational and Educational Facilities
-  Future Residential Growth
-  Study Area Boundary



3

Dunboyne North - View towards Dublin



Meath has the second fastest growing population in Ireland at 5.9% (increase)

33,000 commuters depart Meath each day to work in Dublin

Drive time:
20 minutes - Dublin Airport
25 minutes Dublin City Centre

* Source: Cencus 2016



Shire

Kilsaran Concrete

Avoca

Lands Subject of Draft Direction

Lands Subject of Draft Direction

Proximal Location

2

