

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

**Manager's Report to Members under on Submissions
Received Following the Display of Material
Alterations to the Proposed Variation**



14th May 2014

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

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1. Introduction

This report forms part of the statutory procedure for varying a Development Plan. The purpose of this report is to summarise the submissions and observations received from the public following the publication of the material alterations to the proposed Variation No. 2 to the Meath County Development Plan 2013–2019 and the Manager's response to the issues raised.

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

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

The material alterations to the Proposed Variation were placed on public display from Friday April 11th until Thursday 8th May 2014. Public advertisements were placed advising of the publication of the proposed variation and all statutory organisations were informed of the proposed variation to the plan. The proposed variation was made available for inspection in a number of locations:

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

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

1.1. Contents of Manager's Report

This Manager's Report provides details of each of the submission received. It summarises the issues raised in each submission and outlines the response of the Manager to these issues, including any recommendations that the Manager deems appropriate to respond to the issues.

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

1.2. Procedure following preparation of Manager's Report

This report is being distributed on 14th May to the elected members of Meath County Council for their consideration. A meeting of the Council is to be held on 19th May to consider this report and the proposed alterations to the Draft Variation.

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

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

1.3 Submissions Received

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

No.	Submission Received From	Settlement/Local Area Plan
V2-2001	Colm McLoughlin Planning & Design Services, Architects & Contract Managers on Behalf of James Gallagher	
V2-2002	National Roads Authority	General/Multiple
V2-2003	Department of Communications, Energy & Natural Resources	General
V2-2004	Environmental Protection Agency	General
V2-2005	National Transport Authority	General
V2-2006	Department of Environment, Community & Local Government	Southern Environs of Drogheda
V2-2007	Dublin & Mid East Regional Authority	General
V2-2008	O'Connor Sutton Cronin on behalf of The Rybo Partnership	
V2-2009	David Clarke	
V2-2010	OPW	General
V2-2011	ILTP consulting on behalf of Mr Walsh	Dunboyne
V2-2012	Downey Planning on behalf of Aiden Murphy receiver on behalf of John O'Meara	

The submissions are discussed in the numerical order. Each submission is summarised and then the Manager's response and recommendation to each is provided. All submissions received are available for inspection in the Planning and Community Department, Abbey Road, Navan.

2. Discussion of Submissions

Dunshaughlin Area Submissions Received

Submission V2 – 2001	Colm McLoughlin on behalf of James Gallagher
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Summary of Main Issues Raised

This submission relates to land located at the eastern end of the development boundary in Ratoath identified with an E2 "General Enterprise & Employment" land use zoning objective in Variation No. 2 of the Meath County Development Plan 2013-2019. A concern is raised regarding the proposal to provide an amenity walk way for passive recreational facilities along the stream bordering this land and its compatibility with the future development of the land.

Managers Response

The submission does not relate to a material alteration of the draft Variation and therefore cannot be considered further at this stage.

The submitter should note that the primary objective of Variation 2 is to implement the Core Strategy of the Meath County Development Plan 2013-2019. No objective has been included in same to provide an amenity walkway as suggested in the submission. The section of land zoned F1 "Open Space" land use zoning objective adjacent to the stream was done so as a result of the Strategic Flood Risk Assessment which identified this section of land to be at risk of flooding.

Recommendation

No change.

SEA/AA Comment

No comment required.

Submission V2 – 2002	National Roads Authority
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Summary of Main Issues Raised

The NRA indicates that it remains seriously concerned with regard to elements of the existing variation which were highlighted in their initial submission and remain in situ.

1. Leinster Orbital Route (LOR)

Again, the NRA notes with concern that no reference or provision for the proposed LOR in the amendments to this variation. The submission reiterates many of the points made in their original submission outlining the current status of, and background to, the LOR and the supportive local, regional and national policy framework for the LOR. Having reviewed the Managers response to their initial submission, the Planning Authority is reminded that

- a) The DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (the Guidelines) indicate as a key message that:

"Development plans must include clear policies and objectives with regard to planning and reservation of new routes and/or upgrades."

Box 2.3 Overall Recommended Content for Development Plans and Local Area Plans seeks to protect emerging or preferred routes notified by the NRA in relation to future national road schemes and land requirements for future road upgrades;

- b) The NRA issued a Protection Corridor Study to Meath County Council to identify zones along the key radial routes from Dublin where junctions with the proposed LOR may be constructed in future in order to protect such areas from development, which could compromise the deliverability of the proposed motorway. Such development could significantly restrict the options for junction configurations and could potentially lead to significant cost increases for the compulsory purchase order.

The NRA again recommends that the Council considers implications for the LOR in devising the Written Statements and Development Objectives for the towns and villages in proximity to the proposed Leinster Orbital Route Corridor, i.e. Duleek, South Drogheda, Enfield and Kilcock.

2. Dunboyne/Clonee/Pace Amendments No. 1, 2 and 3

The NRA's principal concerns outlined in the previous submission relating to Development Plan ED OBJ 2, and objectives PACE OBJ 1 and 2 still remain. However, the NRA is further disturbed by the omission of "*and agreement*" in Amendments 1 & 2 as well as "*and agree the future location and appropriate scale of development, particularly in the knowledge intensive, science based and people intensive employment sectors*". This amendment appears to be a retrospective step which undermines the relationship built by the Executive of Meath County Council and the statutory stakeholders as well as not addressing the requirements of the DOEHLG's Guidelines and should be reinstated.

The submission again outlines their stated view that the nature and extent of the development proposed in the vicinity of the Pace Interchange would result in significant impacts on the efficiency, safety and the carrying capacity of the M/N3 and associated junctions in the area and would conflict with official policy which seeks to protect public investment in the national road network. The existing variation further exacerbates this opinion.

Regarding Amendment 26, whilst aware of Meath County Council's policy to apply a more flexible approach to proposals in E2 land use zones under Category 1 centres subject to certain conditions, the NRA advises that due to the location of the Piercetown zoning that a qualification is required in the wording of this amendment which will not compromise the requirement for lower density employment under objective CER POL 1. With respect to Amendment no. 29 and Mapping Objective no. 47, the NRA advises that the inclusion of the amendments is premature pending the finalisation of the IFPLUT.

3. Stamullen

The NRA notes with concern the absence of the strategic review of the original variation objectives and new amendments in line with Section 2.7 of the DoEHLG's Guidelines, the An Bord Pleanála decision and the future requirements for potential development of deepwater port at Gormanston which was requested in their previous submission. The NRA has continually indicated a requirement for evidence led planning as supported by Section 2.7 of DOEHLG's '*Spatial Planning and National Roads Guidelines for Planning Authorities*' with respect to any improvement of the junction of the M1 Junction 7 and would again re-emphasise its already stated concerns with regards to the requirements for increased capacity and connectivity to Stamullen and other interchanges in the County. The submission indicates that appropriate evidence from the Executive of Meath County Council has yet to be provided in this regard.

The NRA does however welcome and support the inclusion in Amendment no. 21 but would advise that substantial evidence will be required for any capacity enhancements. In relation to Amendment 19, the NRA reminds that a Motorway Order would be required for such an upgrade.

The NRA requests that planning applications received in the City North Business Park are referred to them as there have been occasions when they have not been afforded their statutory

opportunity to comment thus ensuring that the performance of the strategically important M1 Corridor is not compromised.

4. Framework Plans

It is again noted that the proposed mechanism to facilitate very significant employment and retail development appears to remain to be facilitated through non-statutory Framework Plans and, in a number of cases, could exclude major stakeholders such as the NRA (except in the case of Stamullen, Amendment No. 21 refers). In this regard, the NRA would refer the Planning Authority to Chapter 2 of the DOEHLG's '*Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities*' which state that "*Non- statutory framework plans and site development briefs can supplement but not replace the function of statutory plans*". The NRA aims to protect the strategic national investment in the area and will if necessary appeal any decision to grant planning permission, which it considers, undermines this investment.

5. Enfield Amendment No. 23

The NRA requests clarification on the location of "White Lands ", as no such zoning is included in the land use zoning objectives map.

Conclusion

Given that the funding for new road infrastructure is limited, managing travel demand on the network in tandem with efficient and effective operation and maintenance regimes is critical to safeguarding the long term economic, environmental and safety benefits from the recently constructed national motorway network. The NRA would also highlight that the '*Infrastructure and Capital Investment 2012- 16: Medium Term Exchequer Framework*' highlights amongst the main priorities for the Government over the medium term will be ensuring adequate maintenance of the National Road Network in order to protect the value of previous investments.

It is the policy of the NRA to seek to protect the substantial investment made by the Exchequer in, and prevent the premature obsolescence of the national road network. Therefore, it is with considerable regret that given the building of a considerable collaborative approach with Meath County Council in recent years that the NRA advises that it may, when considered appropriate, appeal any decision to grant planning permission, facilitated by this variation, as amended, which would serve to undermine the investment made in national roads and the road infrastructure concerned.

Managers Response

Leinster Orbital Route

It is considered unnecessary to repeat the full response which was contained in the previous Manager's Report to this issue. The County Development Plan seeks to clarify and finalise the route of this roadway with relevant stakeholders noting the importance of same in the vicinity of proposed major junctions along the route in order to protect the identified corridor from development intrusion. The Manager considered, having regard to the current status of the project, that it would be premature to protect the Corridor Study Area pending the completion of the planning phase of the project and the identification of a preferred route which is considered consistent with the policy framework of the NTA draft Planning Strategy. The view of the Manager expressed in her previous report has not changed in the intervening period on the basis of the new submission received.

In relation to the specific issue of the Corridor Protection Study submitted to the Planning Authority in February 2009, no lands are identified for development within the Junction Protection Zone

- at Junction 8 on the M1 (Duleek Interchange at Drogheda);
- which impacts with Options M4-B or M4-C at Enfield;
- which impacts with Options M4-A at Kilcock.

There were no junctions identified in the Corridor Protection Study which impact on Duleek.

Dunboyne/Clonee/Pace Amendments No. 1, 2 and 3

The Manager forms the view on the basis of the existing legislation that it is only the material amendments which were placed on public display which may be further modified (in a minor nature) or not accepted by the Elected Members. No material alterations were proposed with respect to the substantive content of PACE OBJ 1 and 2 following consideration of the proposed changes recommended by the Manager to the Elected Members at the last stage in this process. There is no provision therefore to further consider this matter by the Elected Members as part of this Variation. There is no material difference between the existing policy framework contained in the statutory Local Area Plan for Dunboyne Clonee Pace for the area of north Dunboyne around the M3 Parkway and that now proposed in this Variation to the County Development Plan. It is respectfully considered that the appropriate time to reconsider such matters is following completion of the Integrated Framework Plan for Land Use and Transportation as required pursuant to the County Development Plan. It is likely that such a review will take place as part of the review of the LAP commencing in the current year.

Amendment No 1, 2 and 3 seek the removal of the words "*and agreement*" with stakeholders in the preparation of the Integrated Framework Plan for Land Use and Transportation for the Dunboyne Clonee Pace Corridor. It was the stated concern of the Elected Members that the wording contained in the existing County Development Plan allowed external stakeholders to effectively veto the completion of this important study and was thus considered by the Members to be unacceptable. It is considered that Amendment No. 3 essentially removes only the words "*and agreement*" with the remainder of the sentence having to be reconstructed as a result. The NRA's stated concern that "*and agree the future location and appropriate scale of development, particularly in the knowledge intensive , science based and people intensive employment sectors*" has been removed is not correct.

Both the Executive and the Elected Members of Meath County Council are committed to continuing to work with the NRA, NTA and other relevant stakeholders to develop an evidence based framework which will allow high end enterprise and employment uses develop within this strategic location within the Metropolitan Area of the National Gateway. Meath County Council is acutely aware of the need to ensure that the resultant development and infrastructural strategy does not result in significant impacts on the efficiency, safety and the carrying capacity of the M/N3 and associated junctions in the area and accords with official policy which seeks to protect public investment in the national road network. However 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 the NTA.

Amendment 26 and 29 relate to an amendment to the wording of CER POL 1 Lands at Piercetown and CER OBJ 2 Lands at Portan, Clonee to ensure that such uses adhere to the range of uses identified in the County Development Plan as being suitable within these land use zoning objectives within this development centre. The NRA request that a qualification is required in the wording of this amendment which will not compromise the requirement for lower density employment under CER POL 1 Lands at Piercetown whilst the inclusion of the proposed amendment for CER OBJ 2 Lands at Portan, Clonee is premature pending the finalisation of the IFPLUT. It is the view of the Manager that the appropriate time to reconsider such matters is following completion of the Integrated Framework Plan for Land Use and Transportation as required pursuant to the County Development Plan which would form the basis for devising a

new land use framework in this corridor. It is likely that such a review will take place as part of the LAP review commencing in the current year. It was not proposed to consider such matters as part of this Variation until the IFPLUT was completed as clearly set out in ED OBJ 2 (iii) of the County Development Plan 2013-2019. On the basis of the foregoing, the Manager cannot therefore accede to the request by the NRA in this regard.

In relation to Mapping Amendment no. 47 (additional 7 hectares at Bracetown), it was agreed by the Elected Members having considered the submission not to accept the Manager's Response and recommendation in this regard. These lands were agreed to be identified with an employment land use zoning objective as part of the Dunboyne Clonee Pace Local Area Plan and the record of their decision in this regard is clear. The Members are now seeking to remedy the administrative error in not identifying this decision in the adopted LAP as part of this variation process and the Manager accepts their decision.

Stamullen

The Manager does not intend to comment further in relation to the detail now provided in the Stamullen written statement and land use zoning objectives map which will give effect to TRAN OBJ 17 of the County Development Plan. The NRA do not comment on the specific material alterations proposed to the Stamullen written statement and land use zoning objectives map but rather to the principle of creating connectivity from Junction M7 of the M1 Motorway through to Stamullen village. The Manager again notes the comments received from the NRA and is committed to continuing to work with the NRA and others to develop an evidence based framework which will allow high level enterprise and employment to occur within this location strategically positioned along the Dublin Belfast Economic Corridor. Meath County Council is acutely aware of the need to ensure that the resultant development and infrastructural strategy does not result in significant impacts on the efficiency, safety and the carrying capacity of the M1, and in particular, Junction 7 in the area and accords with official policy which seeks to protect public investment in the national road network. As stated previously, 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 the NTA.

The comments in relation to Amendment No. 21 (whereby the NRA shall be involved as a stakeholder in the formulation of an agreed Framework Plan for the lands identified for enterprise and employment) are noted and accepted.

The Manager is aware that a Motorway Order would be required for any upgrade to Junction 7 which could be sought by either Meath County Council or the NRA as the Roads Authorities for this area.

The Planning Authority will continue to refer all planning applications lodged within these lands to the NRA for comment.

Framework Plans

The Manager clearly indicated in her response to the initial submission from the NRA that Meath County Council will refer any Framework Plan which is prepared which could impact on any national road to the NRA for comment. It is considered that this response was reasonable.

Enfield Amendment No. 23

The White Lands are clearly identified on the land use zoning objectives map for Enfield to the east of the urban centre.

Conclusion

The Manager notes the conclusion contained in the submission from the NRA which indicates that it may, when considered appropriate, appeal any decision to grant permission, facilitated by this variation, as amended, which would serve to undermine investment made in national roads and the roads infrastructure concerned. The Planning Authority will seek to ensure, through appropriate dialogue and presentation of the necessary evidential base with the NRA, that no such circumstance arises which will necessitate such a course of action.

Recommendation

No change required.

SEA/AA Comment

No comment required.

Submission V2 – 2003	Department of Communications, Energy & Natural Resources
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Summary of Main Issues Raised

The Geological Survey of Ireland provides comprehensive details of available datasets on bedrock geology, quaternary geology, mineral deposits, groundwater resources, geological heritage, landslide and the Irish seabed. These datasets are available on line and assist with the preparation of Environmental Impact Assessment (EIA). The submission also provides information on the ongoing compilation of Geological Heritage dataset noting that Meath is one of nine counties for which audits have been undertaken.

Managers Response

The Department's submission is noted. It is considered that the nature of the submission is to advise the Planning Authority to the availability of datasets presumably with regard to the carrying out of Strategic Environmental Assessment as there is no obvious relationship between the content of the submission and the content of the proposed variation on public display.

The submission is generic in nature, does not relate to the Material Alterations of the draft Variation and thus cannot be considered further at this stage in the Variation process.

Recommendation

No change.

SEA/AA Comment

No comment required.

Submission V2 2004 Environmental Protection Agency (EPA)

Summary of Main Issues Raised

The EPA has requested three items to be taken into consideration.

1. In Section 10.2 – Carlanstown Written Statement, the proposed bypass for the village is noted. It should be ensured that the SEA/AA and Flood Risk Assessment of the Plan inform the route selection process in the context of ensuring the potential for likely significant effects are minimised / avoided. The requirements of the SEA, Habitats and EIA Directives in particular should be taken into account as relevant and appropriate also.

2. The submission draws attention to the recent DOECLG Circular (Circular PL 9 of 2013) relating to 'Article 8 (Decision Making) of EU Directive 2001/42/EC on Strategic Environmental Assessment (SEA) as amended'. It is requested that the Planning Authorities take this into account in the decision making process.
3. The EPA have requested that following adoption of the amended Plan, an SEA Statement should be prepared summarising the following issues;
 - How environmental considerations have been integrated into the Plan;
 - How the Environmental Report, submissions, observations and consultations have been taken into account during the preparation of the Plan;
 - The reasons for choosing the Plan adopted in the light of other reasonable alternatives dealt with; and,
 - The measures decided upon to monitor the significant environmental effects of implementation of the Plan.

A copy of the SEA Statement with the above information should be sent to any environmental authority consulted during the SEA process.

Manager's Response

The Manager welcomes the submission from the EPA office and the comments contained therein.

The Manager notes the comment in relation to the Carlanstown Written Statement and the proposed N52 bypass for the village. It is considered that planning policy MA OBJ 1 of the proposed Carlanstown Written Statement provides satisfactory measures which require the final route selection to be informed by an Environmental Impact Assessment, Appropriate Assessment and detailed Flood Risk Assessment. This policy wording is considered to satisfactorily address the environmental issues raised in the submission.

The Manager can confirm that recent DOECLG Circular PL 9 of 2013 is being taken into account during the decision making process of this draft Variation.

In addition, the Manager can confirm that an SEA Statement will be prepared following the adoption of the varied Plan with the information in same being sent to all environmental authorities consulted during the SEA process, including the EPA.

Recommendation

No change recommended

SEA/AA Comment

SEA Statement to be prepared on adoption of Variation No. 2

Submission V2 – 2005	National Transport Authority
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Summary of Main Issues Raised

The NTA raised a number of issues of concern in their previous submission in relation to the proposed Draft Variation to the Meath County Development Plan 2013-2019. The following recommendations have not been adequately addressed by the proposed alterations and remain significant concerns for the NTA:

1. In the absence of an agreed integrated land use and transport plan which determines the future location and appropriate scale of development in the Dunboyne/ Clonee/ Pace area, the Authority wishes to record its objection to the inclusion of the objectives CER POL 1, Pace

OBJ 1, CER OBJ 1 and CER OBJ 2 in the proposed variation

2. The Authority also considers that the land use objective Pace OBJ 2 is inappropriate and should be omitted.
3. It is recommended that any further development of employment lands at Stamullen be conditional on the delivery of a deep-water port on the east coast and any changes to the status of Stamullen in the Regional Planning Guidelines.
4. The Authority recommends that the text of the Maynooth Environs Written Statement be amended to exclude high volume, trip intensive developments in the Maynooth Environs.
5. It is recommended that employment zoning in these settlements (Clonard, Summerhill, Longwood, Kilbride, Crossakiel, Athboy, Carlanstown, Carnaross, Nobber, Oldcastle, Rathcairn, Kentstown, Slane, Ballivor, Enfield) should be commensurate with their scale of RPG settlement designation, whilst supporting the expansion of existing businesses in these locations.

The NTA notes that Amendment 5 (Section 9.1) includes the provision for a Data Centre and associated related industries in Kilbride. The Authority considers that such a land use would be more appropriately located in a higher order RPG growth centre (e.g. Navan), with good public transport access.

Manager's Response

The Manager is satisfied that a clear response to each of the issues raised by the NTA was presented in the previous Manager's Report. Indeed, on foot of the submission by the NTA and NRA, the Manager proposed certain alterations to the published draft Variation in relation to Pace OBJ 1 and 2. However, the Elected Members of Meath County Council did not accept the Manager's Recommendation and no substantive alteration to the wording of Pace OBJ 1 or 2 was published in the Material Alterations to the draft Variation. The Manager acknowledges this decision and considers that it is now a matter for the Elected Members now to either make the variation (as altered) or not to make the variation. Any further modifications must be minor in nature, and consequently not seek to increase the extent of any lands zoned for a particular purpose. The Manager therefore has considered only the extent of the submission which relates to the material alterations which were placed on public display, namely the inclusion of a data centre at Kilbride.

The Manager cannot concur with the view expressed by the NTA that a data centre use should be more appropriately located in a higher order RPG growth centre with good public transport access. Data centres provide secure and highly-connected environments for IT and telecoms equipment that powers the digital economy. They are used to house computer systems and associated components and generally include redundant or backup power supplies, redundant data communications connections, environmental controls and security devices. They require significant amounts of energy and must therefore be located proximate to large electricity transmission lines and sub stations as well as being able to access the necessary broadband fibre optics networks. In addition, the location of flight paths also seems to be a notable deterrent to their siting as does unsurprisingly concerns in relation to flood risk. Data Centres are therefore considered a location specific use which also has exceptionally low employment intensity. The Manager is satisfied that due consideration to all of these matters was given by the Planning Authority and that the subject site is considered appropriate for the intended use.

Recommendation

No change required.

SEA/AA Comment

No comment required.

Submission V2 – 2006	Department of the Environment, Community & Local Government
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Summary of Main Issues Raised

The Department notes the proposed material amendments to Variation No.2 and would like to indicate its concern about the amendment involving the change of zoning in the Drogheda Southern Environs from White Land to E1 relating to approximately 12 hectares of land to the east of the rail line.

The Department is of the view that given approximately 46 hectares of undeveloped E1 land exists on the western side of the Southern Environs area, there is no need to zone additional land for the purposes envisaged by the E1 zoning. The large existing E1 zoned undeveloped land is significantly better located regarding access to the motorway than is the case with the land subject to the material amendment. Campus style office development in a landscaped environment is likely to draw a significant portion of persons employed there from a wide catchment, many of whom would use the motorway as part of their daily home/work commute. The proposed E1 zoned land east of the rail line is relatively poorly located compared with the existing undeveloped E1 zoned land on the western side.

Another concern is that opening the E1 land for possible development in the plan period could result in an isolated development taking place in the area east of the rail line. It is noted that all the other zoned land on this side of the line (apart from the G1 community/social/education facilities zoned land near the river) would not be available for development within the plan period. The land east of the rail line should be seen as a longer term development area and it would not be appropriate through zoning changes to introduce the possibility of development in this area on an ad hoc, piece meal basis.

The Department recommends that the proposed material amendment be not incorporated into the adopted Development Plan.

Manager's Response

The proposed alteration to the zoning of the lands in the Marsh Road area was recommended in association with the rebalancing of the release of industrial and employment zoned lands elsewhere in the Southern Environs of Drogheda. In particular, proposed phasing of the existing E2 "*Enterprise & Employment*" land bank off the Duleek Road and of the lands north of the Marsh Road were also included as part of the material alterations which were placed on public display. The Planning Authority took the view that the former lands have been identified with an employment land use zoning objective since 2001 and development has not commenced on the said lands to date. The lands north of the Marsh Road are effectively landlocked until new roads infrastructure is provided which, due to the phasing strategy proposed, is not envisaged within the lifetime of the County Development Plan. The Planning Authority considered, having regard to the success of the employment opportunities which have developed within the South Gate Centre, the limited space available to allow further meaningful expansion and the scale of existing residential development at Colpe (Grange Rath), Bryanstown, New Town and Stameen that further opportunities for employment be considered in this general area which would reduce the demand for car based travel and promote sustainable forms of transport. The lands in question had been identified as White Lands (Strategic Lands) in the 2009 Local Area Plan. The Planning Authority would consider that the identification of this site would advance discussions with Iarnród Éireann/Irish Rail to develop a second train station to the east of McBride Station.

An Economic Strategy is presently being prepared which will consider, inter alia, the identification of strategic employment sites at key locations within the county. It is considered that the final agreed Economic Strategy may provide the basis to formulate a new land use zoning framework for enterprise and employment for Drogheda Environs as part of the LAP review. It is accepted that the proposed material alteration would be considered premature pending the preparation of the Economic Strategy.

The Manager therefore, having carefully considered the submission received and the position afforded to the Department in legislation with regard to a Planning Authority not accepting their recommendation, accepts the principle of the argument presented by the Department in their submission. Accordingly, the Manager recommends that the Members do not include material alteration no. 39, 40 and 41 in making Variation No. 2 which relate to the rezoning of 10 hectares of lands from White Lands to E1 "Strategic Employment Zones (High Technology Uses)" and by phasing other lands within the Mill Road / Marsh Road and off the Duleek Road as E2 "General Enterprise & Employment" (Phase II). In terms of employment land use zoning, this would effectively revert back to the land use zoning objectives which was placed on public display with the original draft Variation.

Recommendation

Omit alterations no. 39, 40 and 41 in making Variation No. 2 which relate to the rezoning of 10 hectares of lands from White Lands to E1 "Strategic Employment Zones (High Technology Uses)" and by phasing other lands within the Mill Road / Marsh Road and off the Duleek Road as E2 "General Enterprise & Employment" (Phase II). The land use zonings will revert back to the land use zoning objectives which was placed on public display with the original draft Variation.

SEA/AA Comment

No comment required as the land use zoning reverts to that presented in the draft Variation.

Submission V2 – 2007	Dublin & Mid East Regional Authority
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Summary of Main Issues Raised

The RPGs set out the regional policy parameters and key principles for the direction of economic growth in the GDA. Strategic Policy EP2 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.*" In this regard Ashbourne / Dunboyne are identified as a Secondary Economic Town in the Strategic Economic Strategy for the GDA.

In relation to the location of employment zoned lands in the County, Strategic Recommendation ER3 of the RPGs seeks "*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.*"

ER17 seeks "*Encourage and facilitate new employment opportunities within hinterland towns with high levels of long distance commuting amongst the existing population to*

- a) *provide new local employment opportunities and assist in reducing long distance commuting patterns, and;*
- b) *build up the local economy to a more locally sustainable level and generate a better balance of employment opportunities across the GDA region as a whole."*

In this regard, and in conjunction with the policies and objectives of the relevant National Authorities, these RPG polices should be the primary consideration in the spatial distribution of employment zoned lands in the County.

Response

The Manager notes the content of the submission which does not raise any objection to the material alterations to the draft Variation which was placed on public display.

Recommendation

No change required.

SEA/AA Comment

No comment required.

Submission V2 – 2008	O' Connor, Sutton, Cronin on behalf of Rybo Partnership
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Summary of Main Issues Raised

This submission relates to Section 12, Trim Area, Amendment No. 23.

The submission indicates that the ambiguous and subjective nature of the opening lines of the proposed Amendments No. 23 warrants the removal of this proposed amendment from formal consideration. Further, it is highlighted that the omission from the introductory statement of the words '*or White Lands*' has a direct implication on all strategic landholdings identified in the Variation. It is contended that this was not the aim of the amendment and therefore, the words '*or White Lands*' should be retained.

In relation to the second part of amendment 23 which includes, '*The White Lands (Strategic Lands) in Enfield are intended primarily for enterprise and employment uses*', it is contended that the subject lands are a recognised strategic landholding "*not just on a local level but from a regional and national perspective (with major and certifiable multinational interest in locating here)*". In this context, it is submitted that Meath County Council should make provision for their eventual delivery for a range of enterprise and employment uses. It is contended that an appropriate means to provide sufficient comfort and development control to Meath County Council in this respect would be to make the release of the White Lands for development during the period of the Development Plan subject to the preparation and agreement of a Framework Plan in conjunction with Meath County Council prior to the submission of any planning application on said lands.

A proposal is put forward to amend the material alteration to the following: '*The White Lands (Strategic Lands) in Enfield are intended primarily for enterprise and employment uses. Considering their strategic nature, these lands may be considered for release during the period of the County Development Plan 2013-2019, subject to the preparation and agreement of a Framework Plan with the Planning Authority prior to the submission of any planning application on said lands*'.

Managers Response

The Manager does not agree that the opening lines of amendment No. 23 are ambiguous and would contend that the message is very clear. Further, the opening lines have not changed from the draft Variation which was initially placed on public display. All amendments proposed were highlighted by a strike through where text is being removed and highlighted in red where new or replacement text is being added. The objective of the Elected Members in their consideration of the original submission on behalf of this landowner was to clarify their intention for the subject

lands in the longer term, beyond the life of the County Development Plan. There has been no ambiguity in the treatment of the subject lands throughout this process.

The existing County Development Plan makes it clear that there is no expectation that development will be brought forward on White Lands within the lifetime of the current County Development Plan and the approach suggested by now identifying these lands with a more definitive land use zoning objective would represent a material departure from adopted planning policy. An Economic Strategy is presently being prepared which will consider, inter alia, the identification of strategic employment sites at key locations within the county. It is considered that the final agreed Economic Strategy may provide the basis to formulate a revised land use zoning framework for enterprise and employment for Enfield. It is considered that agreeing to the proposed modification would be considered premature pending the preparation of the Economic Strategy.

It is considered that there are sufficient lands identified within Phase I employment lands to accommodate employment uses in Enfield over the life time of the County Development Plan 2013-2019. Under the current Enfield Local Area Plan 2009, the subject lands (now identified as White Lands under the proposed draft Variation) were not actually zoned, but were included within a Framework Plan boundary. Given the location of the lands removed from the centre, it is not considered appropriate to apply any other zoning to the subject lands at this time. Further, having regard to Enfield's position in the settlement hierarchy, it would not be appropriate to identify further enterprise lands as Phase I over the lifetime of the Plan.

Recommendation

No change.

SEA/AA Comment

No comment required.

Submission V2 2009 David Clarke

Summary of Main Issues Raised

This submission relates to three adjacent family land parcels located in Castletown area of Athboy town. In summary, the submission is requesting that;

1. Land parcel marked 'B' which have a Phase II 'Order of Priority' phasing arrangement proposed in the draft Variation be reversed to be included in the Phase I lands. The infill nature of this site is the main justification put forward between the existing Castletown housing estate and an extant planning permission granted for a housing scheme on lands to the southwest.
2. It is requested that land parcel marked 'C' be zoned for A2 "*New Residential*" development. This site is currently unzoned. The same infill justification as land parcel 'B' is used for this request.

Manager's Response

Whilst the Manager acknowledges the points put forward in this submission, the items raised do not relate to any of the proposed material alterations contained in proposed Variation No. 2. As such, the Manager is precluded from considering the merits of the case put forward as it relates to these lands. The Manager would point out that the purpose of Variation No. 2 is to put in place an 'Order of Priority' phasing arrangement for the release of existing residential zoned land across the county due to the oversupply of same highlighted in Table 2.4 of the Meath County

Development Plan 2013-2019. The introduction of new additional residential zoned land as requested in this submission is considered contrary to the provisions of the County Development Plan.

Recommendation

No change recommended

SEA/AA Comment

No SEA/AA implications

Submission V2-2010 OPW

Summary of Main Issues Raised

The submission relates to flood risk assessment and management. It outlines the issues raised in the previous submission by the OPW on the Strategic Flood Risk Assessment (SFRA) which accompanied Variation No. 2 and discusses the Manager's Response to these as outlined in the 'Report to Members under Section 13(4)(a) of the Planning and Development Acts 2000-2013.' The following specific matters are outlined:

1. The previous submission by the OPW suggested that it would be helpful if pluvial and groundwater flood risk areas were illustrated. The Manager's Response indicated fluvial and groundwater risk are not specifically illustrated on the maps included in the Strategic Flood Risk Assessment which informed the preparation of the draft Variation as the amount of spatial information displayed is already significant. Areas where there is significant groundwater or pluvial risk are outlined in the text. In addition, at development management stage all planning applications must be subject to appropriate screening for surface water flood risk and must comply with the recommendations of the Greater Dublin Strategic Drainage Study. In response, the OPW have reiterated their suggestion that an illustration (i.e. a map) of pluvial and groundwater flood risk be carried out.
2. The previous submission by the OPW stated that it would be welcomed if a walk over survey was carried out for all areas where there is uncertainty regard flood risk, e.g. Kildalkey where it appears the use of PRFA flood mapping and Enfield which appears to have had historical pluvial flooding. The Manager's Response indicated that a walkover survey was completed for all settlements that were not already subject to walkover during the Flood Risk Review phase of the CFRAMS Programme or a detailed flood study. The OPW again suggest that confirmation is provided where walkover surveys were carried out for all areas with an uncertainty of flood risk and that the impacts that such surveys had on this flood risk are highlighted, in particular, e.g. Kildalkey, where it appears the use of PRFA flood mapping and Enfield which appears to have had historical pluvial flooding.
3. The OPW welcome the amendments proposed to the SFRA on foot of their submission in relation to the inclusion of additional text referring to Longwood and Ballivor in Sections 3 and 5.

Manager's Response

However, with respect to the other issues raised, the Manager would respectfully indicate that these issues were considered in detail at the previous stage and no material alterations on foot of these considerations were recommended to the Elected Members. No material alteration to the extent of flood risk mapping was included within the Material Alterations which were placed on public display. The Elected Members are therefore precluded from further consideration of these matters at this later stage in the process which point has been made repeatedly throughout this report.

The OPW's support for the alterations to Section 3 and 5 is welcomed.

Recommendation

SEA/AA Comment

Submission V2-2011 ILTP consulting on behalf of Mr Eamon Walsh

Summary of Main Issues Raised

The submission raised a number of specific issues:

Housing Projections

The submission states that zoning a specific land bank quantum to meet the household allocated for Dunboyne will not ensure nor promote the delivery of the housing requirement the meet the needs of the town up to 2019. It is argued that it is incumbent on the Planning Authority to ensure that these lands are likely or can be brought forward for development within the timeframe and that much of the zoned lands in Dunboyne earmarked for development by 2019 are unlikely to come forward for development. It is submitted that there is a chronic housing shortage in Dunboyne and thus it is imperative that more appropriately located zoned lands can be brought forward for development to meet the County Development Plan targets for 2019, are provided for in the proposed Amendment. In this respect, the correspondent considers that the current residential zoning of their client's lands should remain in place until the review of the County Development Plan and the new Local Area Plan is in place.

Strategic Flood Risk Assessment Strategy

It is the opinion of the correspondent that their client's lands, which are currently zoned residential, may no longer be considered a flood risk and are outside any of the flood defences constructed in the recent past. It is submitted that it would be premature to change the zoning of Mr. Walsh's lands arising from the findings of the SFRA prior to the preparation of the CFRAM flood study.

Integrated Land Use and Transport Study for Dunboyne

The correspondent states that their client welcomes the above ongoing study and will be seeking to input to this study. However in the meantime it is felt that the status quo should remain in respect to existing zonings in Dunboyne.

Zoning of Lands South of Sadleir Hall

The submission requests that the current Residential Zoning of lands to the south of Sadleir Hall remain as currently shown on the existing Local Area Plan, pending the review of the County Development Plan and making of a new Local Area Plan for Dunboyne/Clonee/Pace and the publication of the Integrated land Use and Transportation Study and the pending publication of the CFRAMS flood hazard mapping.

Manager's Response

Whilst noting the content of the submission, it is respectfully considered that the content of the submission does not relate to the Material Alterations which were placed on public display and thus cannot be considered further at this stage in the Variation process.

Recommendation

No change recommended.

SEA/AA Comment

No comment required.

Submission V2 – 2012

Downey Planning on behalf of Aiden Murphy, Receiver

Summary of Main Issues Raised

This submission is in relation to Amendments No. 30 and 31 (Dunshaughlin Written Statement) and with reference to a landholding of c. 36.8ha, located on the R147 Navan-Dublin Road, to the south of Dunshaughlin town.

Part of the applicant's landholding is within the site labelled 'F' and which is ranked 3rd in the table detailed under amendment no. 30. The ranking of part of the landholding (2.73ha) within Phase I Order of Priority is welcomed noting the intentions of the landowner to develop the lands as evidenced from the planning history of the site. The submitter refers to the objective included under amendment no. 31 which requires the provision of open space (1 acre) on lands identified with an A2 '*New Residential*' land use zoning objective immediately east of Dunshaughlin Business Park. Noting this alteration, the landowner is seeking an alteration to the phasing of Site F such that the entire 7.69ha is designated within Phase I of the Order of Priority for residential development in order to facilitate the new aforementioned objective. It is felt that a minimum of 4.5ha is required to provide a high quality residential scheme which is in accordance with the Council's density of development, the Development Management Guidelines and the aforementioned requirements of Meath County Council.

Managers Response

The 1 acre of open space which is required to be provided as detailed in the objective set down in amendment no. 31 was taken into account when identifying the extent of land to be released from Site F within Phase 1 '*New Residential*'. Therefore, there is no requirement to release any further lands at this stage and to do so would not be consistent with the Core Strategy of the County Development Plan 2013-2019.

Recommendation

No change.

SEA/AA Comment

No comment required.