Chief Executive’s Report on submissions received in respect of Proposed Variation No. 2
Navan Development Plan 2009-2015

In accordance with Section 13(4)(a) of the Planning and Development Acts, 2000-2016

8th May 2017
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Section One  Introduction

This report forms part of the statutory procedure for varying a Development Plan and is prepared under Section 13(4)(a) of the Planning and Development Acts 2000-2015. In accordance with Section 13(4)(b) of the Planning and Development Acts, 2000-2016 this report shall include the following:

(i) list the persons or bodies who made submissions or observations,

(ii) summarise the following from the submissions or observation made under this section:

(I) issues raised by the Minister, and

(II) thereafter issues raised by other bodies or persons

(iii) 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.

The key purpose of this Variation to the Navan Development Plan is to align the Plan with the key tenets of the Economic Development Strategy for County Meath 2014 – 2022 as they relate to statutory land use planning. The Variation also seeks to align the Navan Development Plan with the provisions of the County Development Plan (as varied) and update the written text and maps accordingly. Navan is identified as a key destination in the Greater Dublin Area and in line with the Regional Planning Guidelines is identified as a Large Growth town with its functions to include acting as a regional economic driver whilst also supporting and servicing a wider local economy. Navan, being the County Town of Meath has also been assigned significant economic status to enable it to embody the dynamism of the GDA economy.

This report has three sections as follows:

Section One provides an overview of the statutory process to date and sets out the legislative background and requirements for the preparation of the Chief Executive’s Report under the Planning and Development Acts, 2000-2016.

Section Two contains a full listing of each of the submissions received during the Public Consultation Phase, a summary of the main issues raised in each submission, together with the Chief Executive’s response and recommendations, taking into account the proper planning and sustainable development of the County the statutory obligations of any local authority in the area and any relevant policies or objectives of the Government or Government Minister.

Section Three contains a full list of persons/bodies informed under the statutory process.

The Report is now formally submitted to the Elected Members for consideration.

1.1 Public Consultation

A copy of draft Variation No 2 of the Navan Development Plan 2009-2015, together with the Environmental Report, Natura Impact Report and Strategic Flood Risk Assessment and Management...
Plan was available for inspection from Wednesday 15th March 2017 to Wednesday 12th April 2017 on www.meath.ie and at the following locations:

<table>
<thead>
<tr>
<th>LOCATION</th>
</tr>
</thead>
<tbody>
<tr>
<td>Planning Department, Buvinda House, Dublin Road, Navan, Co. Meath C15 Y291</td>
</tr>
<tr>
<td>Navan Municipal District, Town Hall, Watergate Street, Navan C15 C821</td>
</tr>
<tr>
<td>Meath County Council/Navan Branch Library, Railway Street, Navan C15 RW31</td>
</tr>
</tbody>
</table>

1.2 Next Steps

The report of the Chief Executive must be prepared and submitted to the Members of the Planning Authority not later than 8 weeks after given notice of the intention to make the proposed variation. This report is being distributed to the Elected Members of Meath County Council on the 8th May 2017.

In accordance with section 13(5)(a) of the Planning and Development Acts 2000-2016, the Members of the Planning Authority shall consider the proposed variation and the report of the Chief Executive. The Members shall complete their consideration of the proposed variation and the report of the Chief Executive within 6 weeks of receiving the Chief Executive Report. Following this, the Members must resolve to make the variation to the Development Plan, either with or without the proposed alterations. Material alterations will require a further public display period of 4 weeks.

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 Navan Development Plan shall have effect from the day that the variation is made.
Section Two  Submissions Received

18 no. submissions were received during the draft display period.

These were numbered on receipt as shown in the table below and categorised according to location/issue raised:

<table>
<thead>
<tr>
<th>NO</th>
<th>FIRST NAME</th>
<th>LAST NAME</th>
<th>COMPANY NAME</th>
<th>ISSUES RAISED</th>
</tr>
</thead>
<tbody>
<tr>
<td>V2-001</td>
<td></td>
<td></td>
<td>Transport Infrastructure Ireland</td>
<td>Roads issues</td>
</tr>
<tr>
<td>V2-002</td>
<td></td>
<td></td>
<td>EPA</td>
<td>Environmental Issues – compliance with Water Framework, Floods, EIA, and Habitats Directive</td>
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<tr>
<td>V2-003</td>
<td>Julian</td>
<td>Lee</td>
<td></td>
<td>Provision of Community facilities in Johnstown</td>
</tr>
<tr>
<td>V2-004</td>
<td>Celine</td>
<td>Grant</td>
<td></td>
<td>Provision of Community facilities in Johnstown</td>
</tr>
<tr>
<td>V2-005</td>
<td></td>
<td></td>
<td>HSE</td>
<td>Improving the health and well being of the population in Navan</td>
</tr>
<tr>
<td>V2-006</td>
<td>Sandra</td>
<td>Garry</td>
<td></td>
<td>Provision of Community facilities in Johnstown</td>
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<tr>
<td>V2-007</td>
<td></td>
<td></td>
<td>Bolden Tara Mines c/o Declan Brassil Planning Consultants</td>
<td>Lands at Nevinstown (MP 3 and MP11)</td>
</tr>
<tr>
<td>V2-008</td>
<td></td>
<td></td>
<td>Big House Ltd/Navan Co-Ownership c/o Declan Brassil Planning Consultants</td>
<td>Lands at Carriage Road, Dan Shaw Road, and Trim Road (MP 6)</td>
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<tr>
<td>V2-009</td>
<td></td>
<td></td>
<td>Irish Water</td>
<td>Water and wastewater</td>
</tr>
<tr>
<td>V2-010</td>
<td>Cllr. Jim</td>
<td>Holloway</td>
<td></td>
<td>Provision of community facilities in Johnstown</td>
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<tr>
<td>V2-011</td>
<td></td>
<td></td>
<td>McAleer &amp; Rushe Group c/o Declan Brassil Planning Consultants</td>
<td>MP13 lands</td>
</tr>
<tr>
<td>V2-012</td>
<td></td>
<td></td>
<td>Louth County Council</td>
<td>No issues raised</td>
</tr>
<tr>
<td>V2-013</td>
<td></td>
<td></td>
<td>EMRA</td>
<td>Compliance with Core Strategy of CDP and Regional Planning</td>
</tr>
<tr>
<td>NO</td>
<td>FIRST NAME</td>
<td>LAST NAME</td>
<td>COMPANY NAME</td>
<td>ISSUES RAISED</td>
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<tr>
<td>V2-014</td>
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<td></td>
<td>Targeted Investment Opportunities ICAV co/ Bridgedale Ltd</td>
<td>Clonmagadden (MP 4 lands)</td>
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<tr>
<td>V2-015</td>
<td></td>
<td></td>
<td>Department Housing, Planning, Community &amp; Local Government</td>
<td>Compliance with Core Strategy of CDP</td>
</tr>
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<td>V2-016</td>
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<td></td>
<td>NTA</td>
<td>Compliance with the Transport Strategy for the GDA 2016-35</td>
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<td>V2-017</td>
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<td></td>
<td>Department of Education &amp; Skills</td>
<td>Provision of education infrastructure to meet the needs of the community</td>
</tr>
<tr>
<td>V2-018</td>
<td></td>
<td></td>
<td>Department of Communication, Climate Action and Environment</td>
<td>Information regarding County Geological Sites</td>
</tr>
</tbody>
</table>

Each submission is summarised and the Chief Executive’s response and recommendation to each is provided. All submissions received are available for inspection in the Planning Department, Buvinda House, Dublin Road, Navan, Co. Meath C15 Y291

The Planning and Development Acts 2000-2013 specifically refer to the manner in which the submissions made by the NTA and the Regional Authority should be dealt with. The issues raised by the Minister for Housing, Planning and Local Government should also be summarised separately.

**HOW TO READ THE PROPOSED AMENDMENTS TO THE NAVAN DEVELOPMENT PLAN**

This variation document relates specifically to the relevant sections of the Navan Development Plan 2009-2015 which it is proposed to change and not the entire plan. Therefore, it is advisable that this variation be read in conjunction with the current Navan Development Plan.

The existing text of the Navan Development Plan 2009-2015 is shown in normal font and is included to provide context to the content of each section not being altered as part of this variation process. Please note that the Draft Variation document should not be interpreted as the complete text of the Navan Development Plan 2009-2015 but rather highlights selected parts of the Navan Development Plan which are proposed to be varied as part of Variation no.2. On completion of this variation process, a consolidated version of the Navan Development Plan will be made available for ease of reference and to avoid any potential confusion.

Proposed Amendments / Additions are shown as red underlined text and deletions are illustrated as a strikethrough in red. For example: The Navan Development Plan 2009-2015 sets out the intention of two Planning Authorities — Navan Town Council and Meath County Council, as to the future growth and sustainable development of Navan and its immediate environs. The principal aim of the
Planning Authority is to ensure that future development in Navan takes place in a planned, co-ordinated and sustainable manner over the coming years.

Where deletions or additions are proposed to the policies and objectives of the Development Plan follow on changes may be required to the overall numbering system of such policies or objectives list in relevant chapters. It is the Planning Authority's intention to carry out a renumbering process of such policies and objectives. A consolidated version of the development plan as varied will be published following completion of this variation process.

Section 2 – Submissions received

<table>
<thead>
<tr>
<th>Submission V2-015</th>
<th>Department of Housing, Planning, Community &amp; Local Government</th>
</tr>
</thead>
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Summary of Main Issues Raised

Introduction
The Department recognises the intention of Meath County Council to facilitate the delivery of new housing and employment in Navan by providing appropriate changes to the Navan Development Plan 2009-2015.

Farganstown
It is expected that the link road at Farganstown that has recently received funding under the Local Infrastructure Housing Activation Fund (LIHAF) will be delivered in the next 3 years.

The lands zoned for employment uses at Farganstown are to be developed for strategic high-end employment including the Boyne Valley Food Hub etc. The Department has requested that an additional policy objective(s) is included in the Draft Variation to ensure these lands are designated for appropriate strategic employment uses as set out in the Economic Strategy.

Core Strategy
The Department acknowledges that it may be appropriate to readjust the core strategy in the Navan Development Plan in order to facilitate residential development on lands elsewhere in the Development Plan area.

Taking account of the funding support provided by the LIHAF at Farganstown, the Department considers that any re-balancing of the core strategy should benefit the Farganstown development area.

The Department have sought further clarity in respect of the treatment of the SDZ housing allocation in the Core Strategy for Navan with particular reference to the proposed reallocation of 500 units originally allocated to the SDZ at Clonmaggaddan.

Liscarton
Additional employment lands are to be zoned at Liscarton. Having regard to the location of these lands vis a vis Navan town and the quantum of lands zoned for employment uses in Navan at present, an evidence based rationale for this zoning is required.

Regional Hospital locations – Nevinstown and Balreask Old/Limekilnhill
The identification of lands at Nevinstown and Balreask Old/Limekilnhill as alternative sites for a future regional hospital is an acceptable approach to accommodating this potential strategic development.
Specific objectives should be included in the Draft Variation to ensure these lands will be reserved for hospital and ancillary healthcare development only.

Flood Risk
The Draft Variation and associated maps should be re-examined to ensure it is not in conflict with the requirements of The Planning System and Flood Risk Management, Guidelines for Planning Authorities (2009) in regard to the location of some residential lands or other highly vulnerable uses in Flood Risk Zones A and B.

Chief Executive’s Response
The proposed variation is part of a suite of economic variations proposed by the Council to align the key tenets of the Economic Strategy for County Meath as they relate to statutory land use planning. Having regard to the status of Navan as Meath’s County town and administrative capital, the Council welcomes the continued support of the Department in enhancing the status and contribution of Navan.

Meath County Council have commenced the review of the current County Development Plan and are currently engaged in ongoing consultation with officials from the Department and the Regional Authority regarding the content of same. As part of this review process a new Core Strategy will be prepared for the County which will reflect the status of Navan as the County’s primary development centre. Volume Two of the new Development Plan will include a land use zoning objectives map for Navan. Post adoption of the County Development Plan, a Local Area Plan will be prepared for Navan.

Farganstown
The Chief Executive welcomes the recent LIHAF funding approval for the construction of the Distributor Road at Farganstown. The indication that the Department anticipates this project would be delivered in the next 3 years is also welcomed.

The lands identified for employment uses in MP12 are zoned as a ‘Strategic Employment Zone’ with an option to provide both high technology uses and general enterprise and employment. It is intended that the development of these lands for employment uses would support the creation of a ‘live-work’ community in this part of Navan.

Objective ECON DEV OBJ 8 in the Draft Variation, “To support the delivery of the Boyne Valley food hub on lands at Farganstown” demonstrates the commitment of Meath County Council to the delivery of the Boyne Valley Food Hub in this location.

The attachment of additional clarifying text, to confirm that these lands are designated solely for major employment development is accepted. It is also noted that this area is likely to accommodate the Boyne Valley Food Hub in line with the recommendations of the Economic Strategy.

Core Strategy
As noted above, the proposed variation is part of a suite of economic variations to align land use plans with the key tenets of the Economic Strategy. To this end, the Council received advice from its Economic and Planning Consultants that a targeted approach should be adopted with particular reference to facilitating the delivery of key pieces of roads infrastructure in tandem with the release of employment and residential land to establish ‘live work’ communities. Such communities would be established at a limited number of appropriate locations where key opportunities present
themselves to implement the Economic Strategy in the context of Navan fulfilling its role as County town i.e. Farganstown and Nevinstown.

Circular Letter: PSSP6/2010 which attached ‘Guidance Notes on Core Strategies’ states as follows in relation to SDZs, ‘the area or level of any shortfall or excess of lands or housing capacity will not normally include lands identified for strategic long-term (i.e. 10-15 + years) development as part of Strategic Development Zones or major regeneration sites...’

A review of the current Navan and County Development Plans identified an anomaly in the treatment of the SDZ allocation in the Core Strategy. The current Navan Development Plan included an allocation of 500 units in the Core Strategy for the SDZ whereas the current County Development Plan clearly stated in relation to Table 2.4 (Housing Allocation and Zoned Land Requirements) as per ‘Guidance notes on Core Strategies, DoEHLG 2010 the SDZ at Clonmagadden has not been included in the figure for residential zoned land in Navan.’

The request by the Department to include an appropriate allocation for the Clonmagadden SDZ while allowing a proportionate removal of Phase 2 lands at other locations in the town is noted. As set out above the Council is currently preparing a draft County Development Plan, this process is considered to represent a more appropriate opportunity to address comprehensively the residential requirements arising in Navan over the entire urban area.

Regional Hospital locations – Nevinstown and Balreask Old/Limekinhill
The Draft variation already meets the needs of this requirement as it states as follows in respect of the MP10 lands: ‘it is not anticipated at this time that this strategic land reserve will serve any other purpose other than a Regional Hospital and ancillary healthcare provision.’ In respect of MP11 the proposed variation is consistent in its approach with that of the existing Development Plan for Navan. The potential for release of the White Lands identified in the MP 10 area is included to provide for an alternative site to allow progress to be made on the Regional Hospital project should the site identified as part of the MP 11 lands not be made available in a timely fashion during the plan period. It should be noted that the development of either site will assist in the delivery of key pieces of road infrastructure necessary for the development of the town into the future.

Liscarton
Independent Economic and Planning consultants were commissioned as part of the preparation of the Draft Variation to review the capacity and suitability of all employment lands within the town and its environs and identify additional suitable sites for employment in Navan, where appropriate. These reports considered that additional lands should be provided at Liscarton Industrial Estate to facilitate the expansion of existing business operations at this location and to provide opportunities for greater variety in the range of businesses operating in the Industrial Estate which has had the benefit of land use zoning since 2009. The existing industrial estate at Liscarton was acknowledged by the Consultants as an established and successful industrial estate that is operating close to capacity.

Flood risk
A Strategic Flood Risk Assessment (SFRA) was carried out as part of the Draft Variation. The sequential approach as set out in section 3.2 of ‘The Planning System and Flood Risk Management Guidelines’ was applied in the SFRA. Whilst the SFRA identified marginal impacts of flooding on some lands zoned A2 ‘New Residential’ C1 ‘Mixed Use’, E2 ‘General Enterprise and Employment’, G1 ‘Community Infrastructure’, and R1 ‘Rail Corridor’; it is considered that the risk of flooding could be managed through the application of the sequential approach and the preparation of a detailed Flood Risk Assessment at development management stage to demonstrate that any development fully
adheres to ‘The Planning System and Flood Risk Management Guidelines’, with consideration given to climate change and culvert blockage.

On the MP3 lands Flood Zone A traverses through lands zoned A2 ‘New Residential’. The extent of Flood Zone A has been zoned F1 ‘Open Space’. It is acknowledged that this is not immediately apparent on the zoning map due to the overlay of the Flood Zone on these F1 lands. The zoning map could be amended in order to make the F1 lands more visible in this location.

Recommendation

Replace ECON DEV OBJ 8 as proposed in the Draft Variation with the following spot objective in relation to the proposed strategic employment zone at Faganstown:

**ECON DEV OBJ 8**

To Support the delivery of the Boyne Valley Food Hub on lands at Faganstown.

**ECON DEV OBJ 8**

To facilitate the development of lands at Faganstown identified as E1/E2 “Strategic Employment Zone” solely for the development of major employment proposals including the ‘Boyne Valley Food Hub’.

Zoning Maps

It is proposed to review the zoning maps to clearly identify all lands subject of the Variation. All areas zoned as F1 ‘Open Space’ with a Flood Zone overlaid on top of the ‘Open Space’ zoning shall be reviewed in order to ensure the F1 zoning is clear.

SEA/AA Comment

No comment required.

**Submission V2-013  Eastern and Midland Regional Assembly**

**Summary of Main Issues Raised**

**Introduction**

The Eastern and Midland Regional Assembly (EMRA) recognises that Meath County Council is performing its enhanced economic role as required under the Local Government and Reform Act 2014.

**Settlement Strategy**

The submission notes that the quantum of residentially zoned land in Navan exceeds the amount of residential lands required to cater for the household allocation in the core strategy of the Development Plan, even when discounting a high number of extant permissions and the SDZ housing allocation. A rationale for the additional residential allocation has therefore been requested.

**Enterprise and employment**

The submission identifies that one of the challenges of the Meath County Development Plan is dealing with the significant quantum of available zoned lands, which are in excess of the requirements set out in the core strategy.
It is recommended that in order to justify the zoning of additional employment lands an evidence based analysis of the quantum of available employment generating lands vis a vis the quantum required to cater for employment targets is carried out. These targets should be consistent with the core strategy of the Meath County Development Plan and the RPG settlement and economic strategy.

The Regional Assembly considers that Meath County Council should be satisfied that the proposal to remove the phasing element of the White Lands zoning objective would assist in the implementation of the Economic Strategy.

Retail and Community Infrastructure
In regard to the proposed secondary commercial quarter it is recommended that any retail expansion should be in line with policy guidance for level 2 centres as set out in the Regional Planning Guidelines and the Retail Strategy for the Greater Dublin Area 2008.

Environmental and Flood Assessment
Any new development should be subject to the appropriate environmental assessment, as required.

Chief Executive’s Response
For responses regarding settlement and Core Strategy comments please refer to V2-015 set out above.

Enterprise and Employment
The Meath Economic Development Strategy (EDS) 2014-22 provides the evidence based analysis for the additional employment lands to be zoned as part of this Draft Variation. Supplementary Planning and Economic reports were also prepared as part of this Variation. These reports provide the rationale behind the amendments to the Draft Variation as proposed.

The EDS identified the main challenge for the County is facilitating more jobs locally and reducing the rate of outbound commuting.

As part of the ‘Live-Work’ Community Model set out in the EDS it was considered that the identification of additional lands for employment would facilitate the opportunities for additional employment growth in Navan, which would ultimately reduce the volume of outbound commuting.

The reason for zoning additional E1/E2 employment zoned land at Farganstown is to accommodate the development of major E1/E2 employment proposals requiring a significant site area primarily by way of the introduction of a spot objective at ED DEV OBJ 8 i.e. Boyne Valley Food Hub.

The potential for release of the White Lands identified in the MP 10 area is included to provide for an alternative site to allow progress to be made on the Regional Hospital project should the site identified as part of the MP 11 lands not be made available in a timely fashion during the plan period. The White Lands identified as part of the MP11 lands are intended to support the delivery of the hospital on the community lands.

The concentration of additional employment lands in Navan would be consistent with the designation of the settlement as a Large Growth Town I and Primary Economic Growth Town in the Regional Planning Guidelines and would enhance its attractiveness as a place to live and work.

Retail and Community Infrastructure
Any retail development is required to be in accordance with Retail Strategy for the GDA (2008) and the Retail Planning Guidelines for Planning Authorities (2012). Whilst it is acknowledged that any future expansion of the Town Centre would be towards the lands on which the future rail station would be located, any development on these lands should not be detrimental to the existing core retail area of the town as set out in the existing Development Plan i.e. Navan Shopping Centre and Kennedy Road, Trimgate Street, Market Square, the south-western end of Watergate Street and the northern end of Ludlow Street.

The current Navan Development Plan 2009-2015 does not stipulate that the development of the Regional Hospital at Nevinstown is dependent on the delivery of Phase 2 of the Navan Rail line. This development would be dependent on the delivery of a Local Distributor Road (LDR 4). Taking account of the uncertainty regarding the funding for the Navan Rail line it would be considered too onerous to link the construction of a Regional Hospital to the delivery of this rail line.

Environmental and Flood Assessment
Any applications for development on additional lands zoned as part of the Draft Variation will be subject to all environmental assessments as required under the legislation.

Recommendation
Replace ECON DEV OBJ 8 as proposed in the Draft Variation with the following spot objective in relation to the proposed strategic employment zone at Farganstown:

**ECON DEV OBJ 8**
To Support the delivery of the Boyne Valley Food Hub on lands at Farganstown.

ECON DEV OBJ 8
To facilitate the development of lands at Farganstown identified as E1/E2 “Strategic Employment Zone” solely for the development of major employment proposals including the ‘Boyne Valley Food Hub’.

SEA/AA Comment
No comment required.

| Submission V2-016 | National Transport Authority |

Summary of Main Issues Raised

Zoning of additional lands for employment generating uses
The Draft Variation should include reference to the Transport Strategy for the Greater Dublin Area 2016-2035 and in particular section 7.1.2 (Strategic Planning Principles and Local Planning Principles) and section 5.8.3 (Principles of Road Development). The proposed masterplans should be consistent with these policies and should be developed in a co-ordinated manner in conjunction with relevant third parties, including the NTA and TI in relation to transport.

Liscarton
The submission raised concerns in relation to the proposal to zone additional lands at Liscarton, due to the distance of these lands from the development plan boundary (c.2km) and the lack of pedestrian or cycle facilities linking these lands to the town. The distance of these lands from the Town Centre would also make it difficult to serve these lands by public transport. The zoning at Liscarton is therefore considered to be contrary to section 7.1.2 of the Transport Strategy.
Chief Executive's Response

Section 1.4.6 of the Draft Variation refers to the Transport Strategy for the Greater Dublin Area 2016-2035. This highlights the key objectives of the Transport Strategy. One of the primary objectives of the Draft Variation is the creation of employment in the town in order to reduce the volume of outbound commuting in terms of creating a ‘live-work’ community. It is therefore considered that the Draft Variation supports the principle of reduced travel times, the reduction in distance travelled, and the promotion of walking, cycling, and public transport, which is one of the key elements of the Transport Strategy for the Greater Dublin Area 2016-2035.

As part of the preparation of the Master Plans in Navan, Meath County Council will liaise with the NTA in relation to the design and layout of roads, the provision of pedestrian and cycling facilities, and public transport provision.

Liscarton
For responses regarding Liscarton comments please refer to the response to V2-015 set out above.

Recommendation:
No change

SEA/AA Comment
No comment required.

Submission V2-001 Transport Infrastructure Ireland

Summary of Main Issues Raised

There appears to be a discrepancy between the numbering of the Masterplans on the maps and in the text i.e. on page 54 the text outlining the objectives of Masterplan 9 appears to reflect the requirements of Masterplan 10.

TII express concerns regarding developer led Masterplans and would consider this approach inappropriate, taking account of the strategic national road network issues in relation to the proposed variation, and in particular the proposed link from the Navan South (Junction 8) to the Kilcarn Roundabout (R147) link road.

Chief Executive's Response

The discrepancy between the numbering of Masterplans 9 and 10 is noted. Master Plan 9 refers to lands comprising Pairc Tailteann GAA Stadium whilst Master Plan 10 refers to lands at the Trim Road zoned as White Lands (Strategic Land Reserve). There is therefore a typographical error on page 54 of the Draft Variation whereby it indicates that Master Plan 9 refers to the lands along the Trim Road and Master Plan 10 refers to Pairc Tailteann. This will be addressed.

In relation to the concerns regarding developer-led masterplans, the Planning Authority considers this approach is acceptable. The preparation of masterplans will be an interactive process with the Planning Authority and represents best practice elsewhere in the GDA. TII, together with other statutory consultees, will be consulted as part of any planning application and Meath County Council will encourage the promoters/developers of these key sites to engage in pre-planning discussions, in order that high level issues can be established and addressed.
Recommendation
Amend the references to Master Plans 9 and 10 on page 54 as follows:

Master Plan 9-10

Master Plan 10-9

SEA/AA Comment
No comment required.

| Submission V2-002 | Environmental Protection Agency |

Summary of Main Issues Raised

The submission promotes full and transparent integration of the Plan-making and SEA processes as well as promoting full compliance with the SEA Directive and SEA Regulations.

The submission recommended that the Draft Variation should be consistent with the Core Strategy in the Development Plan and the Regional Planning Guidelines.

The implementation of the Variation should have regard to the requirements of the Water Framework, Floods, EIA, and Habitats Directive.

The submission makes reference to specific policies in the Variation and Navan Development Plan that supports the protection of sensitive and designated sites through the provision of buffer zones together with the requirement for a buffer zones between industrial and residential areas.

Reference is also made to policies that commit to the collaboration with Irish Water in terms of ensuring the provision of adequate water and waste water facilities that would support the continued growth of Navan.

In relation to environmental sensitivities, it would be useful if an environmental sensitivity map that includes key ecological and flood risk sensitivities in order to ensure that appropriate mitigation measures are incorporated into any development.

The submission indicated that it would be useful to link SEA monitoring and reporting and the Variation monitoring and reporting.

The EPA recently published the State of the Environment report “Ireland’s Environment – An Assessment 2016. Chapter 13 of this report identifies the key challenges for Ireland and the key actions required to address them. These issues should be taken into account when finalising and implementing the Variation. This information may also be useful in subsequent reviews of the Plan.

Following the adoption of the Variation, an SEA Statement should be prepared.

Chief Executive’s Response
The Draft Variation is consistent with the Core Strategy in the Development Plan and the Regional Planning Guidelines for the GDA 2010-22.

The implementation of Variation 2 is required to be in compliance with environmental legislation.
An environmental sensitivities map is to be prepared as part of the Environmental Report.

The monitoring of the SEA could be linked to any monitoring of the implementation of the Draft Variation.

If adopted, a SEA Statement will be prepared as requested.

Recommendation:
No change

SEA/AA Comment
Update the Environmental Report to include an Environmental Sensitivities Map.


| Submission V2-009   | Irish Water |

Summary of Main Issues Raised

The submission indicates that Irish Water will be available to confirm water and wastewater availability through Irish Water’s pre-connection process.

Chief Executive’s Response
Response noted.

Recommendation:
No change

SEA/AA Comment
No comment required.

| Submission V2-017   | Department of Education and Skills |

Summary of Main Issues Raised

The submission indicated that the Department has been liaising with Meath County Council in relation to prospective sites for a primary school and special school in Navan and has requested that an objective is included in the Draft Variation regarding the provision of such schools on suitable land in Navan.

The submission also emphasised that the following documents are taken into account in the process of identifying lands for schools:

i) Technical Guidance Document – 025 – ‘Identification and Suitability Assessment of Sites for Primary Schools’

ii) Technical Guidance Document – 027 – ‘Identification and Suitability Assessment of Sites for Post Primary Schools’

iii) The Memorandum of Understanding between the Department of Education and Skills and the City and County Managers’ Association on the acquisition of sites for school
planning.

The submission also included details of the school projects in the Navan area that are included in the capital investment programme for schools and are planned to go to construction stage between 2016-2021.

Chief Executive’s Response
Draft Variation no.2 is principally an Economic Variation whereby the primary objective is to align the Navan Development Plan with the Economic Development Strategy.

The Meath County Development Plan 2019-2025 is currently under review. A submission was received from the Department of Education and Skills on the Strategic Issues Paper prepared as part of the Pre-Draft process. The Chief Executive’s Report on the Strategic Issues Paper indicated that the Draft Plan will accommodate and support the reservation of school sites and multi-unit campuses, as appropriate.

The Draft County Development Plan 2019-2025 will include a land use zoning map for Navan, which will identify lands for community/educational purposes, where required.

Recommendation:
No change

SEA/AA Comment
No comment required.

| Submission V2-005 | HSE (Dublin North-East Environmental Health Service) |

Summary of Main Issues Raised

The submission was prepared under the remit of ‘Healthy Ireland’ and relevant supporting health strategies with the objective of incorporating relevant health actions into the planning of the spatial and built environment of Navan, with the overall aim of improving the health and well-being of the population of the town and its environs.

The Draft Variation should promote the preparation of walking and cycling strategies in order to encourage physical activity and reduce reliance on the private car as the primary mode of transport.

The Draft Variation should ensure that adequate community facilities are in place to meet the needs of the young population in Navan.

The submission supports the provision of housing to meet the needs of an ageing population.

It is also recommended that the Draft Variation includes measures to minimise air pollution and the impact of noise from roads, railways, industry, and recreational activities in proximity to residential properties and noise sensitive premises such as schools, hospitals, or recreational spaces.

The following documents that should be taken into account in the preparation of the Draft Variation:

i) Get Ireland Active – National Physical Activity Plan for Ireland
ii) Smarter Travel Policy  
iii) National Cycle Policy Framework  
iv) Healthy Ireland – A Healthy Weight for Ireland  
v) The County Health Profile prepared for Meath  
vii) Steering Group report on a national substance misuse strategy  
vii) The National Positive Ageing Strategy  
viii) The National Energy Efficiency Action Plan  

Chief Executive’s Response  
This submission is wide-ranging and encompasses a variety of topics that extend beyond the scope of this Draft Variation.  

The concept of the ‘Live-Work’ Community embraces the vision of healthy living with regard to the promotion of reduced travel times to and from work, reduced dependence on the private car as the principle mode of transport, and the encouragement of sustainable modes of transport i.e. public transport and walking and cycling.  

These issues will also be considered as part of the review of the County Development Plan. The HSE made a submission to the Strategic Issues Paper of the Draft Development Plan 2019-2025 raising similar points.  

Recommendation:  
No change  

SEA/AA Comment  
No comment required.  

Submission V2-018 Department of Communications, Climate Action, and Environment  

Summary of Main Issues Raised  

The Geological Survey of Ireland (a division of the Department of Communications, Climate Action and Environment) is in partnership with the National Parks and Wildlife Service (NPWS) to identify and select important geological and geomorphological sites throughout the State for designation as geological NHAs (Natural Heritage Areas).  

County Geological Sites (CGS), as adopted under the National Heritage Plan include sites that may be of national importance but were not selected as the best examples of NHA designation.  

The River Boyne (G.R. 298000, 273000) under the IGH 7 Quarternary Theme would be relevant to the Draft Variation.  

The Tara Mines was not included in the County Geological Survey however it is a goal to consult with mine operators near the end of the mine life in order preserve and provide access to a section of the mineralisation and the mine infrastructure.  

The identification of a site as a County Geological Survey has no statutory restriction and there are no notifiable actions required from the landowner. It is merely a guide to ensure consideration is given to geological heritage in the planning process in order to promote its scientific, educational, and tourism potential.
Chief Executive’s Response
The submission provides useful information regarding local geology in Navan.

The Environmental Report prepared as part of the Draft Variation could be updated to include the details included in the submission.

Draft Variation no.2 is primarily an Economic Variation that would align the Navan Development Plan with the Meath Economic Development Strategy 2014-2022.

It is not considered that this information would be relevant to the Draft Variation, such that it would require the inclusion of additional policies or objectives.

A Local Area Plan will be prepared for Navan following the adoption of the County Development Plan 2019-2025, which is currently under review. This information could be included in the Local Area Plan.

Recommendation:
No change

SEA/AA Comment
Update the Environmental Report to include the details included in the submission.

Submission V2-012  Louth County Council

Summary of Main Issues Raised
No observations

Chief Executive’s Response
No comment

Recommendation:
No change

SEA/AA Comment
No comment required.

Submission V2-003  Julian Lee

Summary of Main Issues Raised

This submission relates to lands included in ‘Master Plan 12’ at Farganstown, where there are proposals for a “work-live” development. The submission acknowledges that the Draft Variation provides for economic, residential, and social and community development in this location.

However there are concerns that the lands zoned for community facilities are on privately owned lands and would therefore not be readily available for community facilities for residents living in the Johnstown area.
In this regard it is considered that the lands owned by Meath County Council should be zoned for community uses as this would remove the obstacle for the delivery of community facilities.

With land available, LIHAF funding secured for the distributor road at Farganstown, and €700,000 included in the Meath Capital Plan local residents are optimistic that community facilities could be delivered in a reasonable timeframe.

**Chief Executive’s Response**
The Draft Variation included the expansion of Master Plan 12 to include for the zoning of additional lands for community and employment uses.

It is acknowledged there is a requirement to provide additional community facilities in Johnstown. An allocation for funding has been included in the MCC Capital Spending Programme. This demonstrates the commitment of Meath County Council to addressing this matter.

Meath County Council is currently assessing community facilities requirements of the Johnstown area. The outcomes of this process will influence the selection of the most appropriate sites for community facilities as part of the review of the County Development Plan 2019-2025.

**Recommendation:**
No change

**SEA/AA Comment**
No comment required.

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**Submission V2-004  Celine Grant**

**Summary of Main Issues Raised**

See submission V2-003

**Submission V2-006  Sandra Garry**

**Summary of Main Issues Raised**

See submission V2-003

**Submission V2-007  Declan Brassil & Company Ltd on behalf of Boliden Tara Mines DAC**

**Summary of Main Issues Raised**

The current Plan and Draft Variation refers to all lands owned by Tara Mines on lands identified as MP 3 and MP11.

In the Draft Variation all lands owned by Tara Mines are referred to as ‘Nevinstown’ however in the past a distinction has been made between the Nevinstown lands (113.5ha to the west of the former
rail line) and Abbeylands (24.8ha to the east of the former rail line). This distinction was based on townland boundaries.

Concerns were raised that some provisions of the Variation have the potential to prevent or defer the delivery of roads infrastructure, housing, and economic development. In particular the submission emphasised that the development of these lands should not be dependent on the delivery of strategic infrastructure such as the Regional Hospital, the Rail Station as the progression of these projects is uncertain at present. It is requested that section 7.6 of the Draft Variation is amended accordingly.

It is considered that these projects could be ‘future proofed’ in the development of these lands.

A number of amendments to the Variation are also proposed. These are summarised as follows:

i) Amend the density of the MP3 lands from 50 units/ha to 35 units/ha

ii) Amend the zoning objectives on the MP11 lands as follows:
   a) Reserve 19.6ha as Community (Objective C1) that would facilitate a future regional hospital
   b) Rezone part of the lands C1 Mixed Use to provide for a sustainable ‘live-work’ community.
   c) Retain part of the White lands objective on an east-west parallel to the river (26.5ha).

iii) A section 49 Contribution Scheme should be prepared for LDR4 so that all lands benefiting from the strategic link contribute to its provision.

The submission includes the suggested modifications to the text in the Draft Variation that would incorporate the amendments as proposed.

Chief Executive’s Response

Distinction between MP3 and MP11
The distinction between MP3 and MP11 is considered sufficient to differentiate the lands. The current Navan Development Plan identifies the differentiation between the MP3 “Abbeylands” and MP11 “Nevinstown” lands. It is not considered there is any confusion in the Draft Variation regarding this issue.

Density of MP3 lands
In relation to the residential density of the MP3 lands, section 5.8 of the 2009 ‘Sustainable Residential Development in Urban Areas, Guidelines for Planning Authorities’ recommends that “in general, minimum densities of 50 dwellings per hectare, subject to appropriate design and amenity standards, should be applied within public transport corridors, with the highest densities being located at rail stations/bus stops.”

The Draft Variation provides for a mixture of densities in the MP3 lands, which range from 35-50 units per hectare. This is considered reasonable and would ensure a mixture of housing typologies and tenures on the lands. Having regard to the strategic location of the lands adjacent to a future rail station it is considered that the overall density of the lands would be reflective of same. An incremental density on these lands would therefore be considered appropriate.
As part of the ongoing review of the County Development Plan and the preparation of the Navan Local Area Plan, which will commence following the adoption of the County Development Plan a full review of the residential densities within Navan will be carried out.

**MP11 Lands**

In relation to the proposed amendment to the zoning of the MP11 lands to include C1 mixed use development, consideration must be given to the fact that the Draft Variation includes the release of Phase 2 residential lands in Master Plan 3, which is adjacent to Master Plan 11. In this regard it is considered that these residential lands could accommodate any employees of a future Regional Hospital and would promote the concept of a ‘live-work’ community.

Whilst it is acknowledged that the development of a Regional Hospital in this location would create opportunities for support services and businesses associated with a future hospital to locate in Navan, there is sufficient land zoned for employment uses in the town that could accommodate such uses.

The request to include text specifying that 100 units would be permitted on the MP 11 lands pre-2019 is unjustified. The Draft Variation included for the release of additional residential lands that would facilitate the provision of key infrastructure in Navan and ensure there would be sufficient residential lands available in Navan to meet current demand.

**White Lands in MP11**

It is noted that the submission indicated that the lands in the southern/south-eastern corner of the MP11 lands are the subject of underground mining and would be more appropriate for development in approximately 5 years.

In relation to the proposed amendment of the White Lands along the north-western section of MP11, it is considered that the release of Phase 2 residential lands in MP 3, which is adjacent to MP11 and in the control of Boliden Tara Mines, would support the concept of a sustainable ‘live-work’ community in this part of Navan therefore it is not considered necessary to include any residential lands in MP11.

As part of the review of the Navan Local Area Plan an analysis will be carried out in relation to the potential quantum of lands required to serve the proposed Regional Hospital and any associated businesses and services.

**Amendments to section 3.2 and Master Plan 11 text**

It is considered reasonable to retain the text “during the period of the Plan, primarily for community facilities to provide for the Regional Hospital and ancillary healthcare uses.”

The delivery of Local Distributor Road 3 is considered essential in any future development of the MP11 lands. It is not considered that the construction of LDR 4 would facilitate the build out of the MP 11 lands due to the relationship of this distributor road with the MP 11 lands and the traffic movements associated with a hospital.

As part of the review of the Navan Local Area Plan an analysis of the future roads infrastructure required to facilitate the future growth of the town will be carried out. This issue will there be reviewed in greater detail as part of this process.
Proposed amendments to DCS OBJ 2
The amendments to DCS OBJ 2 relate to proposed amendments to MP 11. Taking account of the fact it is not recommended to implement any of these amendments, no alterations to DCS OBJ 2 are required.

Proposed amendments to section 7.6
Section 2A4 of the Draft Variation indicates that, subject to not encroaching on the rail reservation as identified by the R1 ‘Rail Corridor’ and not jeopardising the delivery of the rail line, the development of any lands in the rail corridor would be acceptable.

Objective INF OBJ 22a) of the Navan Development Plan is to protect alignment of Phase II of the Navan Rail line and is as follows:

“To protect and safeguard the detailed designed alignment of Phase II of the Navan rail route and surrounding lands (including identified station locations), as illustrated on Map No. 2, free from development and any encroachment by inappropriate uses which could compromise its future development as a rail facility. Land Use Zoning Objective R1 Rail Corridor also refers.”

This objective does not restrict the commencement of any development in the vicinity of the designated rail route pending the construction of same.

However in the interests of clarity, it is considered acceptable that a paragraph could be inserted into section 7.6 of the Draft Variation to confirm that, subject to the protection of the rail corridor as identified by the R1 ‘Rail Corridor’ zoning objective in the Draft Variation, and such development not being contingent on the delivery of the rail line, the Planning Authority would have no objections to the commencement of any development in the vicinity of the rail corridor.

Recommendation:
Amend section 7.6 of the Draft Variation as follows:

The NTA Draft Transport Strategy for the Greater Dublin Area 2016-2035 supports the provision of Phase II of the rail line to Navan. It highlights that ‘Navan is the only Designated Town in the Hinterland that does not currently have a rail service to Dublin city centre. A new rail line linking Navan to Dublin city centre would support regional planning objectives and facilitate Navan’s sustainable development.’ Furthermore, it is noted that Navan is the only administrative capital in the mid-east region which currently does not enjoy rail access. The Transport Strategy states that Phase II of the rail line will not be developed pending the next review of the Strategy (2022). Pending that review, the Strategy requires that the corridor previously identified for a rail link to Navan should be protected from development intrusion. In particular, Measure RAIL 4 (see NTA’s draft Transport Strategy) is of relevance which is to seek the provision of a new rail line from Navan to join the recently constructed spur to Dunboyne and Pace, for onward travel to Dublin city centre. The timing of this line construction and the roll out of services will be subject to economic assessment and the timing and scale of development in the Navan area. That is not to suggest that development cannot proceed adjacent to and in the vicinity of the corridor subject to no physical encroachment of the rail corridor reservation.

SEA/AA Comment
No comment required.
Submission V2-008
Declan Brassil & Company Ltd on behalf of Big House Ltd/Navan Co-ownership

Summary of Main Issues Raised

This submission relates to lands with an area of 8.85ha at Carriage Road, Dan Shaw Road, and Trim Road that lie within MP 6 in the Draft Variation.

There is an extant permission on these lands for a retail development of 35,524m² (10 year permission granted in 2010 under NA/900139, NT/900002, and PL17.235581).

The recent planning history on the site is highlighted whereby ABP refused permission for a 9 screen cinema, café, and 5 no. retail units (PL17.244686, NA140720). Reasons for refusal related to the relationship of the development with the town centre, the development being premature pending the delivery of the central rail station on the site, and the impact of the development on the core retail area of Navan Town Centre.

Under the current Development Plan the lands are identified as a Town Centre expansion area however under the Draft Variation the lands are identified as a ‘Secondary Commercial Quarter’.

The submission recommends that the references to the site being a ‘Secondary Commercial Quarter’ are omitted and that the lands are identified as a Core Retail Area with reference also made to the fact that there is an extant permission on the site.

The submission also requested that the Draft Variation should also clarify that the development of these lands must future proof the provision of a rail line and station on the site but the development of these lands is not dependent on the delivery of the rail line or station, but rather any development on these lands should not encroach on the rail corridor reservation as identified by Objective R1 ‘Rail Corridor’ zoning objective.

Suggested modifications to the text are included in the submission.

Chief Executives Response

The County Retail Strategy indicates that the Core Retail area of Navan includes “parts or all of Trimgate Street, Market Square, Ludlow Street, Watergate Street, Kennedy Road, Navan Shopping Centre, and Kennedy Place.” The use of the term Secondary Commercial Quarter is not supported by previous plans or Department Guidance. The MP6 lands are, however, identified as a ‘Designated Town Centre Expansion Area’ in the Retail Strategy. It is also acknowledged that there is an extant 10 year permission on these lands for a significant commercial development. Taking this into account it would be considered reasonable that the status of the MP6 lands as an Opportunity Site and a Town Centre Expansion area are considered reasonable.

It is considered reasonable to clarify in section 1.4.10 of the Draft Variation that the development of the MP6 lands could proceed subject to no encroachment on the rail corridor as identified by the R1 ‘Rail Corridor’ zoning objective in the Draft Variation, and such development not being contingent on the delivery of the rail line.

Recommendation:
Omit the reference to the MP6 lands as a ‘Secondary Commercial Quarter’ and replace with ‘Town Centre Expansion Area’ throughout the Draft Variation as follows:
Section 3.3
The County Council Offices are located adjacent to the secondary commercial quarter (previously town centre expansion lands), town centre expansion area

2.11 Movement
To facilitate the consolidation of commercial, retail, employment and residential uses in central areas of the town and identified opportunity sites including Meath County Council’s Railway Street offices thus reinforcing the primacy of the town centre and secondary commercial quarter; town centre expansion area

3.2 Master Plans
Master Plan 6 relates to land adjoining the core retail area and identified as a secondary commercial Quarter-town centre expansion area located to the north of the former rail line adjoining the existing town centre which provides primarily for the area designated for town centre expansion area

3.9 Neighbourhood Strategy
The development strategy proposed in this plan is designed to reinforce the town centre as a place for work, shopping, services and living. The development strategy also provides for the expansion of the town centre-provision of a secondary commercial quarter-town centre expansion area

Definition of Navan’s Core Retail Area, Secondary Commercial Quarter, Town Centre expansion area & Town Centre
Figure 4, above identifies the Core Retail Frontage Area of Navan. The Core Retail Area consists of the Navan Shopping Centre and Kennedy Road, Trim gate Street, Market Square, the south-western end of Watergate Street and the northern end of Ludlow Street. 1 The Core Retail Area is normally defined as the area including and immediate to the ‘prime pitch’. That is the area that achieves the highest rentals, best yields, is highest in demand from operators, is overwhelmingly retail floorspace and has the highest footfall of shoppers. The Navan Development Plan includes for the provision of a secondary commercial quarter to include Railway Street and the previously identified Town Expansion lands along Carriage Road, Town Centre expansion area on lands along Carriage Road

Where retail development in an edge-of-centre site is being proposed, other than the lands identified with a B1 “Town Centre” land use zoning objective, only where the applicant can demonstrate and the Planning Authority is satisfied that there are no sites or potential sites including vacant units within a town centre/identified town centre expansion area-town centre expansion area-secondary commercial quarter area that

Strategic Guidance on the Location of Retail Development
The ‘County Meath Retail Strategy’ provides a strategic policy framework for the spatial distribution of new retail development in Navan. Navan has potential for expansion of the town centre on sites and areas adjacent or close to the existing centre including the identified secondary commercial quarter-town centre expansion area-town centre expansion area

Policies
In terms of retail, it is the policy of Meath County Council and Navan Town Council:
RET DEV POL 1

To promote and encourage major enhancement and expansion of retail floorspace and town centre functions in Navan on lands identified with a B1 “Town Centre” land use zoning objective to include
the identified area for town-centre expansion
secondary commercial quarter town centre expansion in order to sustain its competitiveness
and importance as a designated County Town
Centre and ‘Level 2 Centre’ in the Greater Dublin
Area.

Objectives
In terms of retail, it is an objective of Meath
County Council and Navan Town Council:
RET DEV OBJ 1

To assess the provision of new retail development
outside the designated retail core area and the
secondary commercial quarter identified town
centre expansion area (both areas located on lands identified with a B1
“Town Centre” land use zoning objective), in
accordance with the sequential test as outlined in
the County Meath Retail Strategy.

Amend section 1.4.10 as follows:
1.4.10 Integrated Development Framework Plan
The Navan Integrated Development Framework Plan was prepared in December 2002 (and updated
in 2009) and has a time frame up to 2016 which covers the current Navan Development Plan. The
overall Master plan for Navan seeks to make the town a more accessible and attractive town that
could accommodate an ultimate population horizon of 60,000 persons. Central to the overall
strategy is the objective of making Navan a self sustaining community in both economic and
environmental terms and to provide a quality urban environment for its citizens.

The Master plan shows the overall consolidation of development largely within the existing zoned
lands. The more intensive redevelopment is focused around the proposed new central rail station.
The delay in absence of a timeframe in which the delivery of a direct rail link to Dublin can be
expected has direct implications in permitting continued development of existing zoned lands
without compromising or diminishing the development options which the rail link would facilitate.
requires that the corridor previously identified for a rail link to Navan should continue to be
protected from development intrusion. That is not to suggest that development cannot proceed
adjacent to and in the vicinity of the corridor subject to no physical encroachment of the rail corridor
reservation. The nature, extent and timing of development is not contingent on or related in any
way to the delivery of the rail line.

SEA/AA Comment
No comment required.

Submission V2-010  Cllr Jim Holloway

Summary of Main Issues Raised
The submission relates to the lands located in the MP12 area in the Draft Variation, with particular
reference to lands identified for community uses.

It is highlighted that the lack of social and community facilities in the Johnstown/Athlumney area has
been an issue for almost 2 decades.
In March 2017 Meath County Council approved funding of €500,000 in Johnstown/Athlumney. This is in addition to €200,000 allocated for a new playground in 2015, which brings the total funding for the area up to €700,000.

LIHAF Funding has also recently been approved by the Department for a new Distributor Road at Farganstown.

This funding would significantly improve the social, community, and transport infrastructure in the Johnstown area.

Meath County Council owns land in the MP12 area that are zoned E1/E2 (Strategic Employment Zone) in the Draft Variation. It is requested that this land is zoned for community uses in order to ensure the delivery of the community facilities is not impeded. These lands are centrally located in the Master Plan area and would ensure that this infrastructure would be utilised by both residents and future employees of the enterprises operating on the E1/E2 lands.

Chief Executive’s Response
The Draft Variation included the expansion of Master Plan 12 to include the zoning of additional lands for community and employment uses.

It is acknowledged there is a requirement to provide additional community facilities in Johnstown. An allocation for funding has been included in the MCC Capital Spending Programme. This demonstrates the commitment of Meath County Council to addressing this matter.

Meath County Council is currently assessing community facilities requirements of the Johnstown area. The outcomes of this process will influence the selection of the most appropriate sites for community facilities as part of the review of the County Development Plan 2019-2025.

Recommendation:
No change

SEA/AA Comment
No comment required.

Submission V2-011 Declan Brassil & Company Ltd on behalf of McAleer & Rushe Group

Summary of Main Issues Raised
The submission relates to lands located within MP 13 in the Draft Variation.

McAleer & Rushe Group own lands zoned for residential uses (Phase 1 and Phase 2) in MP13.

The Phase 1 lands require access through third party lands (zoned and unzoned) while there is a direct access from the Phase 2 lands on to the Commons Road. McAleer & Rushe have been unable to agree agreement with these landowners regarding a potential access.

The submission proposes to amend the phasing arrangements in the MP13 lands as follows:
   i) The Phase 1 allocation is amended to redistribute c.3.5ha of lands in the north-western quadrant of the MP13 area under the control of McAleer & Rushe, and designate an additional 2ha of Phase 1 land, and any application on the Phase 1 area shall include for
the delivery of c.190 dwellings and the section of Local Distributor Road 2 (a) within the ownership of the applicant.

Or alternatively

ii) The Phase 1 allocation is amended to c.3.5ha of land under the control of McAleer & Rushe to the north of the river Swan and designate an additional 2ha of Phase 1 land, contiguous to and accessed from the established neighbourhood of Canterbrook to the east. Any application on the Phase 1 lands shall include for the delivery of c.190 units. The commencement of development in this area shall be linked to the provision of a school site to the Department of Education or the Planning Authority.

Amendment ii] is the preferred option.

Chief Executive's Response
The subject lands are located within Master Plan 13 in the Draft Variation. The Draft Variation did not include any amendments to this Master Plan area other than amending the labelling of the lands from FP3 to MP13.


The issues raised in the submission are outside the scope of this variation therefore it would not be appropriate to comment on same as part of this process.

The County Development Plan 2019-2025 is currently under review. As part of the preparation of the Draft County Development Plan, a land use zoning objectives map will be prepared for Navan, which will inform a Local Area Plan for Navan, which will be prepared following the adoption of the Navan Development Plan. The issues raised in this submission could be considered as part of this process.

Recommendation
No change

SEA/AA Comment
No comment required.

Summary of Main Issues Raised

The submission relates to lands located within MP4 of the Draft Variation.

The land use zonings in MP4 are residential, open space, community infrastructure, mixed use, and general enterprise and employment.

Concerns were raised that the land uses are not set out in a manner that would allow for the viable and phased development of the site. It is also considered that the location of the c.3.7ha of EZ employment lands along the northern boundary of the Master Plan area would be harmful to the residential amenity of the adjacent residential lands to the south and the existing school to the south.
Transport infrastructure serving these employment lands is poor. The quantum of employment land in this location would be contrary to ECON DEV POL 9 of the Navan Development Plan.

Bridgedale are of the opinion that a more appropriate location for this E2 employment land would be to the north of the Proudstown Road (outside of the Master Plan area) which would create a more acceptable buffer between the E2 and A2 uses.

The relocation of this E2 land would allow for consolidated land uses within the Master Plan area including additional A2 residential land and G1 community infrastructure which could be used to provide a retirement home or secondary school campus.

**Chief Executive’s response**

The subject lands are located within Master Plan 4 in the Draft Variation. The Draft Variation did not include any amendments to this Master Plan area.


The issues raised in the submission are outside the scope of this variation therefore it would not be appropriate to comment on same as part of this process.

The County Development Plan 2019-2025 is currently under review. As part of the preparation of the Draft County Development Plan, a land use zoning objectives map will be prepared for Navan, which will inform a Local Area Plan for Navan, which will be prepared following the adoption of the Navan Development Plan. The issues raised in this submission could be considered as part of this process.

**Recommendation**

No change

**SEA/AA Comment**

No comment required.
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<td>Wicklow County Council</td>
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<tr>
<td>44.</td>
<td>Louth County Council</td>
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