



# Appendix 2



# Meath County Development Plan 2021-2027

## BOOK 2

**Submissions on respective Chapters 2 – 11**



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**A full list of all submissions and their corresponding reference number have been listed in Appendix A – Book 5.**

# Chapter 2

## Core Strategy

<b>Submission No.:</b>	MH-C5-32
<b>Submitted by:</b>	Joe Langan
<b>Submission Theme(s):</b>	Chapter 2 & 3 Settlement Strategy
<b>Summary of Submission:</b>	
This submission relates to Ashbourne and how it is addressed in the Settlement Strategy:	
<ol style="list-style-type: none"> <li>1. It is considered that Ashbourne should be noted as a “key town” in a similar designation to Maynooth.</li> <li>2. It is considered that Ashbourne and Ratoath should develop together into a unified settlement which could facilitate a rail link.</li> </ol>	
<b>Chief Executive’s Response</b>	
<ol style="list-style-type: none"> <li>1. As part of the preparation of the Draft Plan, Meath County Council have incorporated the details of the EMRA RSES. Table 4.2 of the EMRA RSES identifies the settlement hierarchy down to ‘Key Town’ level. As Ashbourne is not identified in this table as a ‘Key Town’ the Draft Plan is consistent with the EMRA RSES. To recommend a change in line with this submission would result in the Draft Plan being inconsistent with the EMRA RSES.</li> <li>2. This submission submits that combining Ashbourne and Ratoath into a joint settlement would provide a settlement of a scale that would justify a rail station. NPO 62 of the NPF notes that greenbelts should be identified and strengthened as well as preventing the coalescence of settlements. As such advocating the development of Ashbourne and Ratoath as a joint settlement would be contrary to the National Planning Framework. In relation to a potential rail line at Ashbourne/Ratoath please refer to response to submission MH-C5-816 from the OPR.</li> </ol>	
<b>Chief Executive’s Recommendation</b>	
<ol style="list-style-type: none"> <li>1. No change recommended</li> <li>2. No change recommended</li> </ol>	

<b>Submission No.:</b>	MH-C5-41 (PLEASE DISREGARD MH-C5-36 AS MAPS MISSING - PLEASE SEE COMPLETE SUBMISSION MH-C5-41 [Submission in respect of proposed Hilltown ECO Development Zone])
<b>Submitted by:</b>	Hilltown Development Group
<b>Submission Theme(s):</b>	Chapter 2 Core Strategy, Chapter, 3 Settlement Strategy, Chapter 5 Movement Strategy, Chapter 11 Development Management and Land Use Zoning Strategy
<b>Summary of Submission:</b>	
<p>The purpose of this submission is to request that the lands at Hilltown be identified for the preparation of an Eco Development Zone having regard to their proximity to the Hansfield Strategic Development Zone (SDZ) opposite the site. A summary of the matters raised is outlined below:</p> <ol style="list-style-type: none"> <li>1. The submission seeks for the subject lands to be zoned and designated as Ireland’s first Eco SDZ. In this regard the proposal is essentially an expansion of Hansfield SDZ.</li> <li>2. The types of development sought includes residential, retail, cafes/restaurants, offices, education, sports facilities and recreational space.</li> </ol>	

3. Provide a new railway station within the subject lands, use an integrated land use and transport planning approach including the use of sustainable transport as much as possible i.e. cycling and pedestrian movement.
4. Provide for the creation of employment and residential units on the lands subject to this submission.

#### **Chief Executive's Response**

1. An SDZ can only be designated by an Order prepared by Government as per Section 166 of the Planning and Development Act 2000, as amended. As such, the Planning Authority cannot designate a SDZ as requested under the Development Plan Process, .
2. The provision of the uses and zonings sought in this case would be contrary to the Metropolitan Area Strategic Plan outlined as part of the Regional Spatial Economic Strategy for the Eastern and Midland Region 2019-2031. Furthermore, the designation of the subject site for the development sought would have a detrimental impact on the development of Dunboyne/Clonee/Pace as well as having an impact on the development of Maynooth. In relation to this matter it is also considered that the designation of these lands as requested would be contrary to the National Planning Framework as well as the Dunboyne Transport Study (Transportation Study for Dunboyne and Environs) that has been agreed with the Department, the NTA and TII. As such, designating the subject site as requested would not be consistent with the Settlement Strategy for County Meath or the region.
3. The reservation of these lands for a rail line and station at this location would have to be supported by a policy at a national and regional level. It is also noted that the provision of a rail line has not been included in any capital programme or the National Development Plan. In the absence of this, it would be premature pending an overarching national strategic objective. It is the more immediate priority of Meath County Council to extend the rail line to Navan and as outlined in Chapter 5 Movement Strategy. Table 5.1 in the Movement Strategy does not identify a proposed station at this location.
4. The Draft Plan has identified the creation of new live-work communities outlined as part of ED POL 3 of the Draft Plan and the designation and zoning of the subject site as requested in this submission would be inconsistent with the entire settlement framework for the county and will be detrimental to the future development of existing settlements such as Dunboyne/Pace/Clonee and would have a detrimental impact on the settlement of hierarchy of the county.

#### **Chief Executive's Recommendation**

1. No change recommended.
2. No change recommended.
3. No change recommended.
4. No change recommended.

<b>Submission No.:</b>	MH-C5-37
<b>Submitted by:</b>	Alan Mullen
<b>Submission Theme(s):</b>	Chapter 2 Core Strategy, Chapter 11 Development Management Standards and Land Use Zoning Objectives
<b>Summary of Submission:</b>	

This submission relates to the rezoning of lands at Mornington on behalf of Alan Mullen and James Mullen. The submission states the following:

1. It is submitted that the subject lands could be zoned to provide the 228 no. units that will be required for the Bettystown/Laytown/ Mornington East/Donacarney/ Mornington area.
2. The lands are currently in the rural area and are submitted as being adjacent to the existing built area and only 5.4km from Drogheda. The site is noted as being adjacent to transport links, schools and has appropriate site access. A number of maps are submitted to support the above. In light of this, it is submitted that the subject lands should be re-zoned for residential development.

#### **Chief Executive's Response**

1. It is considered that adequate lands have been identified as part of the Draft Plan to accommodate the proposed population growth for Bettystown/Laytown/ Mornington East/Donacarney/ Mornington area. This is outlined as part of Table 2.11 of the Draft Plan which has been updated as per OPR submission MH-C5-816.
2. As noted above, adequate lands have been identified as part of the Draft Plan to accommodate the proposed population growth for Bettystown/Laytown/ Mornington East/Donacarney/ Mornington area. It is considered that the subject site is not sequentially preferable and as such it is not considered that the subject lands should be zoned.

#### **Chief Executive's Recommendation**

1. No change recommended
2. No change recommended

<b>Submission No.:</b>	MH-C5-58
<b>Submitted by:</b>	Michael McGillen
<b>Submission Theme(s):</b>	Chapter 2 Core Strategy, Chapter. 11 Development Management Standards and Zoning, Ratoath Written Statement
<b>Summary of Submission:</b>	
This submission seeks for lands to be included in the settlement boundary of Ratoath as part of the Draft Plan. The submission specifically states that:	
<ol style="list-style-type: none"> <li>1. The lands comprising c. 142 acres should be included in the proposed plan prior to adoption. The lands are indicated on an attached map and the eastern edge of the lands are c. 1.5km from the centre of Ratoath.</li> </ol>	
<b>Chief Executive's Response</b>	
<ol style="list-style-type: none"> <li>1. The subject lands have been considered as part of the CE Report process and it is considered that there are more sequentially preferable lands compared to those outlined as part of this submission.</li> </ol>	
<b>Chief Executive's Recommendation</b>	
<ol style="list-style-type: none"> <li>1. No change recommended</li> </ol>	

<b>Submission No.:</b>	MH-C5-146 &157
<b>Submitted by:</b>	The Hawthorns Residents Committee
<b>Submission Theme(s):</b>	Chapter 2 Core Strategy, Chapter 11 Development Management Standards and Land Use Zoning Objectives, Chapter 7 Community Building Strategy,
<b>Summary of Submissions:</b>	
<p>This submission relates to general town planning, planning enforcement and sustainability. This submission can be summarised as follows:</p> <ol style="list-style-type: none"> <li>1. It is noted that the general objective of the Draft Plan is an excellent statement of aspiration.</li> <li>2. There is a lack of town planning and enforcement of compliance particularly in the south of the county, where it appears that no regard is given to associated essential services.</li> <li>3. There has been a lack of joint planning between the Council and Government Departments and this is highlighted by an incorrect number of schools being noted in Ashbourne as well as the use of out-of-date census figures.</li> <li>4. Improved transport, health facilities including primary care centres and recycling facilities should be planned for as the population increases.</li> <li>5. Improved housing should be provided for the older people as our population ages. This should be included in applications similar to Part V housing and is in the best interests of the community.</li> </ol>	
<b>Chief Executive's Response</b>	
<ol style="list-style-type: none"> <li>1. This comment is welcome and Meath County Council will endeavour to deliver on this general objective.</li> <li>2. Enforcement - in relation to alleged breaches of planning permission, this is part of Meath County Council's statutory functions under planning legislation. Breaches of planning permission are enforced by Meath County Council in line with this statutory function and should there be any concerns in relation to specific elements of construction in the county, these can be reported to Meath County Council's Enforcement Unit. Furthermore, the Draft Plan seeks to address the manner in which the south of the county is developed. This includes the plans for housing as outlined in the Chapter 2 Core Strategy and Chapter 3 Settlement Strategy as well as the proposed changes to rural housing development outlined in Appendix G of the Chief Executives Report. It is considered that these approaches are in compliance with planning legislation and the best interests of the proper planning and sustainable development of the county.</li> <li>3. A number of Government Departments have made submissions on the Draft Plan and if changes are required in relation to the Draft Plan this will be updated prior to the finalisation of the Draft Plan.</li> <li>4. The Draft Plan outlines an approach to facilitating improved facilities for an increased population and has identified appropriate lands for particular developments as per Chapter 11 Development Management Standards and Land Use Zoning as well as through the Land Use Zoning Maps included in Volume 3 of the Draft Plan. These lands have been zoned for appropriate and sustainable levels of development having engaged with infrastructure providers and the Draft Plan facilitates the delivery of infrastructure/services. Meath County Council will work with these infrastructure</li> </ol>	



providers as they deliver improved services. Such an approach is outlined as part of CS OBJ 12 of the Draft Plan.

5. Provisions have been outlined as part of the Draft Plan in relation to the provision of accommodation for older people. This has been outlined as part of the Housing Strategy included in the Appendices associated with the Draft Plan as well as Section 3.8.3 of Volume 1 of the Draft Meath County Development Plan 2020-2026. In relation to Part V Housing, it should be noted that the provision of this type of housing is empowered by national legislation. There is currently no such provision within the Planning and Development Act 2000, as amended, for older people however, Meath County Council are proactive in this area and through an Age Friendly Section promoting the value of older people and their needs and working together with the Housing Section, initiatives are being developed throughout the county for new age friendly infrastructure in towns and villages together with appropriate housing typologies being delivered to meet the needs of older people. Thankfully, this area of valuing our older population is receiving greater attention and funding and Meath County Council shall continue to work and develop strategies and infrastructure in order to accommodate an aging demographic profile within the county.

#### **Chief Executive's Recommendation**

1. No change required
2. No change recommended
3. No change recommended
4. No change recommended
5. No change recommended

<b>Submission No.:</b>	MH-C5-159
<b>Submitted by:</b>	Withdrawn
<b>Submission Theme(s):</b>	N/A
<b>Summary of Submissions:</b>	
This submission has been withdrawn	
<b>Chief Executive's Response</b>	
No response required	
<b>Chief Executive's Recommendation</b>	
No change required	

<b>Submission No.:</b>	MH-C5-285
<b>Submitted by:</b>	Michael & Liz Collins
<b>Submission Theme(s):</b>	Chapter 1 Introduction, Chapter 2 Core Strategy, Chapter 3 Settlement Strategy, Chapter 4 Economy and Employment Strategy, Chapter 5 Movement Strategy, Chapter 6 Infrastructure Strategy,
<b>Summary of Submissions:</b>	

This submission relates to the majority of the chapters in the Development Plan Volume 1. This submission can be summarised as follows:

1. It is highlighted that there should be an onus on implementing submissions as well as highlighting that Ireland is signed up to The Aarhus Convention and it is submitted that this relevant.
2. It is considered that the objective of the SEA has not been achieved particularly as there are a number of quarries permitted in Meath causing environmental damage as well as there being no enforcement of unauthorised quarries.
3. It is noted that National and Regional Policy is integrated into the plan as well as the inclusion of population figures.
4. The submission highlights that concern with regard to how '*Build to Rent*' and '*Shared Accommodation*' is addressed. It is requested that policies seeking to exclude both of these types of development are included in the Draft Development Plan.
5. It is requested that a policy be included requiring that '*buildings are adequately insulated to prevent sound from travelling beyond their living area...*'. It is also requested that a policy be included requiring adequate insulation so that '*the need for artificial heat is minimised.*'
6. It is noted that Industrial development should not have a detrimental impact on people's lives in Meath.
7. New developments should be designed to allow for play areas for children as well as passive surveillance for same. Appropriate housing mixes should also be provided to facilitate people at different points of their lives.
8. Whilst the submission welcomes the majority of the Economy and Employment Strategy Chapter specific concerns with regard to Data Centres and the associated policies. The concerns include the electricity requirements and effect on climate change targets as well as issues relating to security and terrorism.

#### **Chief Executive's Response**

1. This comment is noted regarding submissions. In the Chief Executive Report, all submissions have been reviewed and responded to with appropriate recommendations being incorporated into the Draft Plan.
2. As per the documents that were produced as part of the Draft Plan, policies and objectives with regard to quarries have been considered as part of the SEA and as such this matter has been adequately considered as part of the Draft Plan and the SEA. In relation to enforcement, it should be noted that there is a specific Planning Enforcement section in the Planning Authority and such matters would be addressed by this section in line with the relevant planning legislation. Should the submission author have any concern in relation to a specific site of unauthorised development, it is advised that they contact the Planning Enforcement section to report such matters. As such, it is considered that the preparation of the County Development Plan is not the appropriate forum to address alleged matters of unauthorised development.
3. This comment is noted and it is welcomed.
4. It is noted that both '*Build to Rent*' and '*Shared Accommodation*' are outlined in Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities 2018. It is required under planning legislation that Government Guidelines be included in the preparation of the Draft Plan. As such the inclusion of these types of accommodation is consistent with planning legislation and it would not be possible to provide for a policy/objective as requested.
5. Building regulations dictate the quantum of insulation that is required as part of a new dwelling and so it is not appropriate for such a policy to be included in the Draft Plan as it

could not be legally enforced in line with the Planning and Development Act 2000, as amended.

6. It is considered that the approach to industrial development and the designation of sites for same in the Draft Plan achieves what is sought in this submission.
7. The provision of children's play areas, passive surveillance of same and a mix of housing units is addressed in the Draft Plan as well as ministerial guidance. The provision of play areas is addressed in SOC POL 37 and DM OBJ 36 of the Draft Plan, with passive surveillance of public open space required as part of SOC OBJ 15. The securing of a mix of housing is addressed in SH POL 5 of the Draft Plan. No further changes are required to the Draft Plan.
8. As noted in Section 4.8 of the Draft Plan, Meath County Council have worked closely with industry leaders and relevant Government Departments and Agencies to identify appropriate zoning objectives in relevant locations in County Meath that could potentially accommodate the development of Data Centres. It is noted as part of Section 4.8 that Meath County Council will *"continue to work with industry leaders and stakeholders in the identification of suitable sites for data centre development."*

In relation to the environmental concerns relating to data centres, Chapter 10 of the Draft Plan relates to Climate Change and throughout the plan preparation process, WSP Consultants have provided guidance and advice on policies in relation to climate change. In this regard, it is considered that these matters have been adequately considered. The 'Government Statement on The Role of Data Centres in Ireland's Enterprise Strategy' was prepared by the Department of Business, Enterprise and Innovation and published in June 2018. It was considered that the plan-led approach outlined in this document allows Ireland to optimize the benefits that these strategically important data centre investments can bring to our society.

Furthermore, as part of the Planning and Development (Amendment) Act 2018, it is intended to include Data Centres of a certain scale as Strategic Infrastructure Development. As such, it is considered that the above requested changes are not necessary given that they are contrary to national policy and any environmental impacts will be considered on a case-by-case basis as applications for Data Centre Development are brought forward by certain developers in the sector.

Finally, matters relating to security and terrorism are not matters that can be appropriately considered as part of a development plan process and as such these are a matter for national government. In this regard, the government statement on data centres is clear in supporting their delivery whilst balancing the potential climate change impacts. In this regard, the proposed approach outlined in the Draft Plan is considered acceptable.

#### **Chief Executive's Recommendation**

1. No change recommended
2. No change recommended
3. No change recommended
4. No change recommended
5. No change recommended
6. No change recommended
7. No change recommended
8. No change recommended

<b>Submission No.:</b>	MH-C5-302
<b>Submitted by:</b>	David Gilroy
<b>Submission Theme(s):</b>	Chapter 2 Core Strategy
<b>Summary of Submissions:</b>	
This submission notes that other policies should be referenced as part of the Draft Plan including:	
<ol style="list-style-type: none"> <li>1. A Connected County, Meath's Digital Strategy 2020</li> <li>2. Meath Age Friendly Strategy 2017-2020</li> <li>3. Healthy Meath Plan 2019 – 2021</li> <li>4. Meath Climate Action Strategy 2019-2024</li> </ol>	
<b>Chief Executive's Response</b>	
It is noted that these documents are included and have been considered in the preparation of the Draft Plan as follows:	
<ol style="list-style-type: none"> <li>1. The Draft Digital Strategy for County Meath-2019 has been considered as per Section 6.16.2. It is noted that this document has been finalised and as such, the final document has been included in the Draft Plan. The reference to the strategy will be updated.</li> <li>2. The Meath Age Friendly Strategy 2017-2020 has been considered as per Section 7.6.2.2. The document is referred to as the Meath County Age Friendly Strategy, 2017-2020 and as such references shall be updated.</li> <li>3. The Healthy Meath Plan 2019-2021 has been considered as per policy SOC POL 31. The document is referred to as the Healthy Meath Strategy 2019-2021 and as such references shall be updated.</li> <li>4. The Meath Climate Action Strategy 2019-2024 has been considered as part of the plan as noted in objective INF OBJ 46. The document is referred to as the Meath Climate Action Strategy and as such references shall be updated.</li> </ol>	
<b>Chief Executive's Recommendation</b>	
<ol style="list-style-type: none"> <li>1. Change Recommended: Vol. 1, Chapter 6, Section 6.16.2 <i>"Draft Digital Strategy for County Meath-2019"</i> to <b><i>"A Connected County, Meath's Digital Strategy 2020"</i></b>.</li> <li>2. Change Recommended: Vol. 1, Chapter 7, Section 7.7.2, SOC POL 11 <i>"Meath County Age Friendly Strategy, 2017-2020"</i> to <b><i>"Meath Age Friendly Strategy 2017-2020"</i></b>.</li> <li>3. Change Recommended: Vol. 1, Chapter 7, Section 7.7.6, SOC POL 31 <i>"Healthy Meath Strategy 2019-2021"</i> to <b><i>"Healthy Meath Plan 2019-2021"</i></b>.</li> <li>4. Change Recommended: Vol. 1, Chapter 6, Section 6.15.3.6, INF OBJ 46 <i>"Meath Climate Action Strategy"</i> to <b><i>"Meath Climate Action Strategy 2019-2024"</i></b>.</li> </ol>	

<b>Submission No.:</b>	MH-C5-338
<b>Submitted by:</b>	HK Harmoon Ltd.
<b>Submission Theme(s):</b>	Chapter 2 – Core Strategy, Chapter 3 - Settlement Strategy, Chapter 11 Development

	Management Standards and Land Use Zoning Objectives
<b>Summary of Submission:</b>	
<p>This submission queries the approach to the Kinnegad Environs and seeks the following</p> <ol style="list-style-type: none"> <li>1. It is sought that Kinnegad should be designated or at the least recognised, as a town in the County Settlement/Core Strategy, e.g. as a Self-Sustaining Town, similar to the nearby towns of Enfield and Kilcock.</li> <li>2. A new Core Strategy Objective stating the following or similar is sought: <i>“To prepare a Joint Vision and Local Area Plan for Kinnegad in partnership with Westmeath County Council within the lifetime of this Plan”</i>.</li> <li>3. As part of Section 3.4.5 of the Draft Plan it is requested that Kinnegad is noted as a settlement for which a non-mandatory local area plan will be prepared.</li> <li>4. It is requested that an objective stating the following is included in the Settlement Strategy <i>“To prepare a Joint Vision and Local Area Plan for Kinnegad in partnership with Westmeath County Council within the lifetime of this Plan”</i>.</li> <li>5. It is sought that a strategic overview of the potential of the Kinnegad environs is included in Section 4.7.4 of the Draft Plan.</li> <li>6. It is requested that a ‘Kinnegad Environs Written Statement’, is included in Volume 2 of the Draft Plan. It is also requested that zoning and heritage maps are included as part of this requested amendment to Volume 2 of the Draft Plan.</li> </ol>	
<b>Chief Executive’s Response</b>	
<ol style="list-style-type: none"> <li>1. No part of Kinnegad town is included in the boundary of County Meath as the development of the town has occurred to the north/west of the Kinnegad River which is the boundary between Meath and Westmeath County Council. As such, it is not considered appropriate to designate Kinnegad as a settlement in the Meath CDP.</li> <li>2. The preparation of joint plans with other planning authorities has been agreed at a regional level and are included in the EMRA RSES. As the preparation of such a joint plan has not been noted in the EMRA RSES it is not considered appropriate to include the proposed objective.</li> <li>3. As noted above Kinnegad is not recognised or considered a settlement that is included in County Meath and the inclusion of such a policy could only be done in conjunction with Westmeath County Council. As such this objective will not be included as part of the Draft Plan.</li> <li>4. As noted above this would not be consistent with the EMRA RSES and would have to be agreed with Westmeath County council and the regional authority in advance. As such this objective will not be included as part of the Draft Plan.</li> <li>5. As outlined above it is not considered that the inclusion of such a section would be appropriate at this time.</li> <li>6. This matter has been addressed in the comments above and whilst not considered appropriate at this time, Meath County Council will continue to engage with Westmeath County Council on matters such as this as well as others.</li> </ol>	
<b>Chief Executive’s Recommendation</b>	
<ol style="list-style-type: none"> <li>1. No change recommended</li> <li>2. No change recommended</li> <li>3. No change recommended</li> <li>4. No change recommended</li> <li>5. No change recommended</li> <li>6. No change recommended</li> </ol>	

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<b>Submission No.:</b>	MH-C5-382
<b>Submitted by:</b>	Benjamin Schazmann
<b>Submission Theme(s):</b>	Chapter 1 Introduction, Chapter 2 Core Strategy, Chapter 4 Economy and Employment Strategy, Chapter 7 Community Building Strategy, Chapter 10 Climate Change

#### Summary of Submissions:

This submission highlights a number of concerns in relation to the Draft Plan:

1. It is considered that the Draft Plan is inconsistent with the Project Ireland 2040 - National Planning Framework as the proposed growth rate in East Meath is greater than that proposed in Project Ireland 2040 - National Planning Framework. In this regard it is requested that the population allocation for East Meath should be reduced from c. 2000 to c.600 and it is currently proposed to provide 20% growth in a single development plan.
2. It is submitted that the "New Residential" zoning category should be removed as part of the proposed Draft Plan and replaced with a Mixed use zoning.
3. It is submitted that infrastructure and local services should be provided before or at the same time as an increased population.
4. Urban sprawl should be avoided due to the impact on an increased CO2 emissions as well as being inconsistent with International, EU and Irish planning and environmental policies, legislation as well as case law. It is suggested that new residential units should only be accessible to local workers and a policy relating to same should be considered.
5. It is suggested that at a national level a number of measures should be considered such as refusing funding for developments promoting urban sprawl, state housing being built and the Office of the Planning ensuring Development Plans do not promote urban sprawl.
6. It is queried how the 30% of new housing being provided on infill/brownfield lands is being achieved.
7. There is an increased car dependence in relation to East Meath due to a lack of local employment opportunities. This should be resolved by applying a local needs approach to the development of housing in areas such as East Meath.
8. Engage and increase the provision of housing in the Dublin area and de-zone lands in the commuter areas to force the construction of residential development in the Dublin Area.
9. It is sought that all motorway, dual carriageway and bypass developments are suspended and money is diverted to the development of public transport.
10. It is submitted that all of the growth rates for settlements outlined in the Draft Plan should be re-considered so as to ensure compliance with the Project Ireland 2040 - National Planning Framework.
11. Employment should be provided proximate to residential development.

#### Chief Executive's Response

1. With regard to consistency with Project Ireland 2040 - National Planning Framework it is noted that the proposed growth rate for Bettystown-Laytown-Mornington East, as outlined on Table 2.11 of the Draft Plan, is an increased population of 1,500 people or c.12.6% of the existing population. In this regard it is considered that the growth rates are appropriate, particularly considering that there has been a vast reduction in the quantum of lands zoned in the East Meath (Bettystown-Laytown-Mornington East) area. The growth strategy for east Meath over the new plan period is considered more appropriate

and sustainable following detailed consideration, analysis and modelling in the preparation of the Settlement and Growth Strategy for the Draft CDP. It is important to note that both OPR and EMRA have both endorsed and supported the growth model in their submissions to the Draft Plan.

2. The “New Residential” zoning is considered appropriate and is consistent with the approach to the preparation of development plans outlined in the Planning and Development Act 2000, as amended, as well as the Development Plan Guidelines 2007.
3. The intention of the Draft Plan is to ensure that the appropriate infrastructure is in place prior to development being undertaken. It should, however, be noted that in many cases Meath County Council are reliant on third parties such as national infrastructure providers to develop the necessary infrastructure which can enable development. The growth strategy in the Draft CDP has however been aligned to the infrastructure providers plans for the East Meath area over the plan period.
4. The intention of the Draft Plan is to provide for 30% of infill lands to be developed as per NPO 3c and this has been identified in the Draft Plan. Meath County Council will monitor the delivery of units to establish if NPO 3c is being achieved and will utilise measures such as the active land management system and the vacant sites register to encourage the development of such lands. In relation to the addition of a policy noting that units shall only be accessible to local worker, it is considered that this would be contrary to planning legislation in Ireland as well as being potentially unconstitutional. As such, any policy would be contrary to national and regional policy as well as potentially being unenforceable. Local needs policy will however be applied to one off housing in the countryside in accordance with the revised rural Housing Policy outlined in Chapter 9 of the Development Plan. No such policy is proposed to be included in the Draft Plan.
5. As noted above, the Draft Plan promotes the consolidation of the existing built up area and sets out sustainable policies to avoid future urban sprawl. It is recognised that the East Meath area has developed rapidly over recent decades without the necessary infrastructure and community supports required to accommodate this growth. The new County Development Plan will not accommodate such high levels of growth with a greater focus on tackling community and social issues in the area. Local Area Plans shall be developed during the life of the CDP to address such issues. In this regard the Draft Plan is consistent with Regional and National policy, whilst also ensuring that sufficient housing will be provided for the proposed population.
6. In developing the zoning objectives of respective settlements, all lands were assessed to establish which were most appropriate and sequentially located with the necessary services to support development and those which were consistent with the definition of infill and brownfield sites provided through national guidelines and regional planning policy.
7. An updated Rural settlement Strategy has been developed (see Appendix G of the Chief Executive Report) and this Strategy will ensure that the local needs approach is implemented at appropriate locations in rural areas so as to reduce the numbers of people living in the countryside and commuting to Dublin or other large urban centres. In the case of urban areas, it is considered that the application of a local needs policy is not feasible as outlined above and it is also not considered to be necessary as a number of areas in East Meath have access to public transport and as such have the opportunity to avail of Public Transport. As such, it is not considered that an amendment to the Draft Plan is required in this regard.
8. It should be noted that the Draft Plan only applies to the functional area of Meath County Council and the Executive cannot zone / direct the use of lands in any area outside its administrative boundaries.
9. This matter is addressed in the Movement Strategy as well as in the recently published



programme for government. The approach in both of these documents is consistent in relation to allowing certain roads projects to proceed in order to reduce congestion as well as ensuring that road safety is improved, whilst also providing and increased focus on the provision of public transport. It is considered that the Draft Plan facilitates this approach and no amendments to the Draft Plan is proposed.

10. It is considered that the proposed growth rates are generally consistent with the regional and national policy and this has been outlined as part of the response to the OPR submission, MH-C5-816.
11. In relation to this matter, it should be noted that ED POL 3 outlines Meath County Council's live-work communities approach and it is expected that a greater level of jobs will be provided proximate to residential locations with the aim of reducing the need for commuting. It is also noted In Section 6.16.3 that Meath County Council will engage with Infrastructure providers so as encourage the roll-out of improved broadband services so as too improve the ability to work from home.

#### **Chief Executive's Recommendation**

1. No change recommended
2. No change recommended
3. No change recommended
4. No change recommended
5. No change recommended
6. No change recommended
7. No change recommended
8. No change recommended
9. No change recommended
10. No change recommended
11. No change recommended

<b>Submission No.:</b>	MH-C5-593
<b>Submitted by:</b>	County Meath Chamber
<b>Submission Theme(s):</b>	Chapter 2 Core Strategy, Chapter 4 Economic and Employment Strategy, Chapter 5 Movement Strategy, Chapter 6 Infrastructure Strategy, Chapter 7 Community Building Strategy, Chapter 9 Rural Development Strategy, Chapter 11 Development Management Standards and Land Use Zoning Objectives.
<b>Summary of Submission:</b>	
This submission relates to a number of matters including the following:	
<ol style="list-style-type: none"> <li>1. It is requested that ED OBJ 3 is amended by adding ".....and other stakeholders including County Meath Chamber....."</li> <li>2. It is noted that appropriately zoned land should be provided including promoting the intensification of employment in the north and west to reduce commuting as well as facilitating the zoning of land for FDI spin off projects.</li> <li>3. In relation to Transport Infrastructure is noted that the extension of the rail line to Navan is a priority and the upgrading of the N51 and N52 to provide high quality east west links</li> </ol>	



should be prioritised.

4. In relation to Utility Infrastructure it is requested that reliable and secure sanitary, energy, communication and water services are provided.
5. Further third level facilities including outreach programmes and apprenticeships should be provided.
6. It is requested that a specific objective is included to note that Meath County Council will work with representative bodies such as County Meath Chamber.
7. It is considered essential that zoning for necessary community facilities is included to promote sustainable communities.
8. Initiatives to address rural depopulation should also be considered.

#### **Chief Executive's Response**

1. Meath County Council recognises the close relationship that has developed between County Meath Chamber and the Local Authority. It would not, however, in this context be appropriate to list each body that Meath County council engages with as to do so would result in a long list of local, regional and national bodies. As such, it is not considered appropriate or proposed to amend ED OBJ 3.
2. In line with the Meath Economic Development Strategy 2014-2022 as supported by ED POL 2, as well as the quantum of lands zoned for employment purposes (B1, C1, E1, E2, E3, etc.) it is considered that there are sufficient employment lands proposed as part of the Draft Plan. If it were a case that a large potential employer wishes to invest in County Meath and existing zoned lands are not considered appropriate to accommodate their needs, the two options available to them include a proposed variation under Section 13 of the Planning and Development Act 2000, as amended to zone appropriate lands or to submit a planning application that could contravene the County Development Plan under Section 34(6) of the Planning and Development Act 2000, as amended.
3. The extension of the rail line to Navan is addressed as part of MOV POL 5, MOV POL 6 and MOV OBJ 3. In relation to the works along the N51 and the N52 these are addressed as part of MOV OBJ 43 and are identified as Critical Infrastructure in Table 5.1 of the Movement Chapter. In this regard, these schemes have already been considered in the preparation of the Draft Plan.
4. The provision of energy, sanitation, water and communications infrastructure is the responsibility of third party national infrastructural providers. It is considered that the policies and objectives outlined in Chapter 6 Infrastructure as well as other sections of the Draft Plan facilitate the provision of this critical infrastructure. Meath County Council will continue to work with national infrastructure providers to ensure the delivery of such infrastructure as part of the implementation of the Draft Plan.
5. In relation to the promotion and apprenticeships of third level programmes including outreach programmes and apprentices, it is considered that these are addressed by ED POL 7, ED OBJ 18, ED OBJ 28, ED OBJ 60, SOC POL 15, SOC OBJ 4 and Section 7.7.3.2 of the Draft Plan. As such it is not considered necessary to provide additional policies or objectives in this regard.
6. As noted above it is not considered appropriate or necessary to identify a body/agency whilst not listing others. It is not considered necessary to make the requested alteration. It is considered that the request is suitably addressed by ED POL 5 and ED OBJ 3.
7. As part of the Draft Plan, it is considered that sufficient community infrastructure lands have been zoned in County Meath. Further details in the provision of community facilities is addressed in Chapter 7, Community Building Strategy.
8. It is considered that the provisions of the Draft Plan adequately address the development

of the rural area. Please refer to the updated Chapter 9 Rural Settlement Strategy provided in Appendix G of the Chief Executive Report.

#### Chief Executive's Recommendation

1. No change recommended
2. No change required
3. No change required
4. No change recommended
5. No change required
6. No change recommended
7. No change required
8. No change recommended

<b>Submission No.:</b>	MH-C5-629
<b>Submitted by:</b>	Tom Phillips & Associates on behalf of Frank Cosgrove
<b>Submission Theme(s):</b>	Chapter 2 Core Strategy, Chapter 7 Community Building Strategy, Chapter 11 Development Management Standards and Land Use Zoning Objectives.
<b>Summary of Submission:</b>	
<p>This submission relates to a number of matters including the following:</p> <ol style="list-style-type: none"> <li>1. It is submitted that the population growth outlined in Table 2.11 is flawed and that a population growth in excess of the provision of the NPF and RSES should be provided.</li> <li>2. It is submitted that extant units should be excluded from the population projections as not all of these units will be delivered.</li> <li>3. It is submitted that additional lands should be zoned to accommodate the fact that not all lands zoned A2 New Residential will be delivered during the lifetime of the Draft Plan, leading to a shortfall of housing for the proposed population.</li> <li>4. It is submitted that greater clarity of how the quantum of new residential land has been calculated is required and does it include land that is deemed to be unsuitable for development until post 2026. It is also requested that it is clarified if the SDZ lands in Navan have been included in the quantum of lands zoned.</li> <li>5. It is considered that the Draft Plan does not account for the barriers of housing delivery and as a result does not provide for an adequate quantum of A2 New Residential zoned lands.</li> <li>6. It is submitted that the inclusion of part residential zoning on the land will ensure that the required community facilities can be delivered in tandem with the future residential development. It is considered that the lands should be zoned as the lands will provide appropriate additional residential lands, is appropriate to national/regional/local policies, is consistent with the available infrastructure/facilities in the area, is a logical extension of the settlement and does not have any environmental or heritage designations that would restrict the zoning of the site. A number of zoning options are submitted as part of this submission for the lands that provide a mix of A2 New Residential and G1 Community Infrastructure zoning.</li> </ol>	

### Chief Executive's Response

1. This approach suggested would be inconsistent with National legislation, the National Planning Framework and the RSES of the EMRA Region. It would therefore be inappropriate to amend the Draft Plan as requested. It should however be noted, that an updated Table 2.11 is provided as part of the response to the OPR submission MH-C5-816.
2. As part of the preparation of the core strategy, it is considered important to address extant permissions particularly as the targets outlined in the National Planning Framework and the Regional Spatial and Economic Strategy relate to the period of 2016-2031. As such, it is important to consider extant permissions as part of this as these will contribute to the delivery of units as well as the achievement of population growth for the period between 2016-2031. If extant permissions were not considered or addressed as part of the Core Strategy this could result in significant over-zoning of land in County Meath which would result in the Draft Plan being inconsistent with national and regional planning strategy and ultimately lead to a Ministerial Direction. It should be noted that CS OBJ 3 outlines that Meath County Council will ensure the implementation of the population and housing targets and that CS OBJ 2 notes that Meath County Council will also ensure that sufficient lands are available for housing development throughout the plan period. Meath County Council can use powers under Section 13 of the Planning and Development Act 2000, as amended to vary the Draft Plan, if deemed necessary. Meath County Council will monitor the grants of permission issued, commencements and the construction of units to ensure that for development management purposes that an application is compliant with the growth targets outlined in Table 2.11 of the Draft Plan. In this regard, CS OBJ 3 will be updated to reflect this as noted below.
3. It is noted as part of the National Planning Framework Implementation Roadmap that headroom has been provided on the population figures that apply to the Draft Plan. This combined with Meath County Council's Active Land Management Strategy will ensure that lands are released for development at appropriate times and consequently Meath County Council do not consider it necessary to zone additional lands as requested in this case. This head room has already been inbuilt into the figures.
4. As part of the preparation of the update to Core Strategy Table 2.11 'Post 2027' lands have not been included in the quantum of lands zoned for residential purposes. It is also noted that footnote 39 of the Draft Plan notes that the 38.1 Ha of lands at the SDZ at Clonmagadden is not included in the calculation of lands for Navan or the Core Strategy. The population and housing figures included in SDZ are provided through a separate process. It is acknowledged that this footnote may not have been noted on some copies of the Draft Plan that was issued and as such this will be considered as part of the general updates and the updated Table 2.11.
5. Meath County Council have considered the barriers to the delivery of lands for housing as part of the preparation and zoning of lands as part of the Draft Plan. The quantum of lands zoned as part of the Draft Plan are considered appropriate to provide for the level of sustainable growth outlined in the Settlement Strategy. Furthermore, the Draft Plan is considered to generally be in accordance with the requirements of national and regional planning policy and as such it is not considered necessary to zone additional lands, As outlined above headroom has been provided on the population figures that apply to the Draft Plan and, combined with Meath County Council's Active Land Management Strategy, will ensure that lands are released for development. Meath County Council do not consider it necessary to zone additional lands as requested in this case.
6. The zoning of the subject lands are not considered appropriate as they are not sequentially preferable compared to other land being zoned in Navan and it considered that there are sufficient quantum of lands zoned at appropriate locations throughout the

town during the plan period.

#### Chief Executive's Recommendation

1. No Change recommended
2. No change recommended
3. Change recommended Vol. 1 Written statement Chapter 2 Core Strategy, section 2.14.2, CS OBJ 3:

#### CS OBJ 3

To ensure the implementation of the population and housing growth household allocation set out in the Core Strategy and Settlement Strategy, in so far as practicable. **Meath County Council will monitor the number of units that are permitted and under construction/built as part of the implementation of this objective.**

4. No change recommended - Please refer to updated Table 2.11 as part of MH-C5-816 OPR submission
5. No change recommended
6. No change recommended

<b>Submission No.:</b>	MH-C5-669
<b>Submitted by:</b>	Loughglynn Developments Ltd./Hora Homes
<b>Submission Theme(s):</b>	Chapter 2 – Core Strategy, Chapter 11 – Development Management Standards and Land Use Zoning Objectives
<b>Summary of Submission:</b>	
<p>This submission relates to a number of matters including the following:</p> <ol style="list-style-type: none"> <li>1. Concern with the de-zoning of land is noted due to potential effect on the cost of development land. It is submitted that Meath County Council should not be constrained by the NPF population as these figures do not appear to be accurate and Meath County Council should undertake an independent assessment. It is also considered that the Draft Plan is being prepared prematurely and that the Draft Plan should be prepared after Ministerial Guidelines in relation to development Plans is published.</li> <li>2. It is suggested that greater attention should be paid to the actual rates of delivery that can be achieved over the life of the Development Plan and the areas of Residential Zoned lands should be adjusted accordingly. It is also considered that when allocating zoning, priority should be given to zoning lands which are in the ownership of trading house builders.</li> <li>3. It is submitted that there should be adequate zoned land within existing urban areas to cater for people who would otherwise be “self-builders” in the hinterland of towns i.e. those who would normally live in one-off rural dwellings. This is noted in the context of the NPF Implementation roadmap and the transitional arrangements noted therein</li> <li>4. It is requested that a number of Development Management standards are altered including the following: <ol style="list-style-type: none"> <li>a. It is requested that DM OBJ 20 is altered so as to be less prescriptive and allow for innovative design</li> <li>b. It is requested that DM OBJ 165 is altered as the provision of basement car parking is typically not financially viable.</li> </ol> </li> </ol>	

- c. It is requested that DM OBJ 161 & Table 11.4 are amended to provide reduced standards for 2 bedroom houses of 1 space per dwelling and 1 visitors space per 4 no. dwellings. It is also submitted that a reduced standard should be applied to apartments/flats with 1 space per unit and 1 visitors' space per 4 no. units.
  - d. It is requested that DM OBJ 42 is amended to allow for alternatives to 1.8m high capped rendered concrete block or brick walls.
  - e. It is requested that DM OBJ 171 & Table 11.6 are changed as the required standard applies per bedroom rather than per bed space. It is also requested that the note under Table 11.6 is altered so that it notes that 1 visitor bicycle space per two apartment units is required. The current note refers to housing units and this is considered to be confusing.
5. In relation to public open space it is requested that DM OBJ 34 and DM OBJ 36 are amended as it is considered that the application of both is excessive and will lead to more open space than is required being provided. It is submitted that the delivery of this open space as specified in the Draft Plan is not feasible and would be unimplementable.
  6. It is also submitted that a more detailed analysis of the impact of low density, extant permissions, built out sites and net to gross yields on zoned lands is required.

#### **Chief Executive's Response**

1. The suggested approach is from a developer perspective and would be inconsistent with National legislation, the NPF and RSES in the EMRA Region. As such, it would not be appropriate to amend the Draft Plan as required. It should however, be noted that an updated Table 2.11 is provided as part of the response to the OPR submission MH-C5-816. It should also be noted that as part of the Planning and Development Act 2000, as amended, it is a requirement of Section 9(1) of this Act that a development plan is prepared every six years. This Act also specifies as part of Section 10(2)(a) that the development plan shall include the zoning of lands for a particular use. When these provisions are combined with the requirement to be consistent with regional and national policy, it leads to a necessity for the Draft Plan to be prepared and lands to be dezoned or rezoned. Meath County Council are not in a position to wait for the publication of updated development plan guidelines and as such the Draft Plan has been prepared in line with the requirements of the most up to date legislation as well as the most up to date guidelines.
2. The delivery of units will be monitored throughout the implementation of the Development Plan over the period 2021-2027 and this has been noted as part of submission MH-C5-629. Please refer to same for further details.
3. As part of the Draft Plan, this has been considered and it is submitted that the policies and objectives outlined in the rural chapter as well as the quantum of lands zoned in the Draft Plan provide for a balance of units to be developed in urban and rural areas, and particularly in suitable locations. As such, it is not considered necessary to change the plan in this regard.
4. (a) An amendment to this approach would be inconsistent with the guidance outlined in Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (Cities, Towns & Villages). It is considered that the objective allows for innovative design and accounts for situations where it is not possible to provide the required 22m separation distance.  
 (b) Whilst Basement car parking is known to be expensive, it is noted as part of this policy that it should be provided where appropriate and allows for alternative solutions. It will be the responsibility of an applicant to address why such a solution cannot be implemented should it not be possible to provide basement car parking.  
 (c) Please refer to NTA submission (MH-C5-823). The Council will use its discretion to

reduce parking where there are increased availability of services and access to public transport.

(d) It is considered that this policy can be amended as requested and this will be outlined in the Chief Executives Recommendations below.

(e) Please refer to the response to the NTA submission (MH-C5-823) in relation to cycle parking standards.

5. It is noted that there may have been some confusion in relation to these matters and as such it is considered appropriate to remove DM OBJ 36. This will be outlined in the Chief Executives Recommendations below.
6. It should be noted that the densities outlined as part of the Draft Plan are net densities and as such they have already considered the reality that certain portions of lands will not be delivered for development as there will be a requirement for infrastructure, etc. When considering the quantum of lands to be zoned, this was also considered. As such it is not necessary to undertake a further analysis. Should any issues arise during the implementation of the Draft Plan these will be identified as part of the monitoring process that has been noted in CS OBJ 3. It should also be noted that revised densities have been outlined as part of the response to the OPR (MH-C5-816).

#### Chief Executive's Recommendation

1. No change recommended
2. No change recommended
3. No change recommended
4. Change recommended, Vol 1. Written Statement, Chapter 11, Section 11.7.10:

##### DM OBJ 42

To require that boundaries between the rear of existing and proposed dwellings shall be a minimum of 1.8 metres high and shall be constructed as capped, rendered concrete block or brick walls, to ensure privacy, security and permanency. ~~Alternative solutions will not be considered.~~ **Alternative durable materials will be considered.**

5. Change recommended, Vol 1. Written Statement, Chapter 11, Section 11.7.9.1:

##### ~~DM OBJ 36~~

~~In all residential development applications where the future population will exceed 1000 persons, open space in addition to the 15% requirement set out at DM OBJ 34 shall be provided at a minimum rate of 3.2 hectares (8.0 acres) per 1000 population in accordance with Table 11.1. All such residential development proposals shall be accompanied by a statement setting out how the scheme complies with the requirements set out in Table 11.1.~~

All objective numbers shall be updated accordingly.

6. No change recommended

<b>Submission No.:</b>	MH-C5-714
<b>Submitted by:</b>	An Taisce
<b>Submission Theme(s):</b>	Chapter 2 Core Strategy, Chapter 3 Settlement Strategy, Chapter 4 Economic and Employment

	Strategy, Chapter 5 Movement Strategy, Chapter 6 Infrastructure Strategy, Chapter 7 Community Building Strategy, Chapter 8 Cultural and Natural Heritage Strategy, Chapter 10 Climate Change Strategy, Chapter 11 Development Management Standards and Land Use Zoning Objectives
<b>Summary of Submission:</b>	
<p>There are a number of matters raised as part of the An Taisce submission and these are addressed below in turn:</p> <ol style="list-style-type: none"> <li>1. Policy and investment in Meath should be reprioritised away from road infrastructure (with the exception of necessary maintenance and town bypasses) and redirected to support public and active transport projects and cycling infrastructure. The answer to the affordable housing issue for the employment generated in the Dublin Metropolitan Area is to reform land use and housing policy to achieve significant affordable housing within that area. It is submitted that the proposed levels of growth are not achievable due to the lack of sustainable transport.</li> <li>2. It is considered that the proposed zoning constraints have not been addressed as part of the Draft Plan. In this regard it is noted that there are a number of previous refusals for business parks and that the zonings in locations such as Stamullen and Carton Woodlands are entirely car dependent should be reconsidered</li> <li>3. It is noted that the congestion caused by commuter traffic is not appropriate and is an issue that has existed for a number of years. It is submitted that it is absolutely essential that any new residential and employment development should only be allowed on the condition that additional public transport facilities are provided so as to reduce the reliance on the private car. It is outlined that there is insufficient capacity along the existing rail lines and that the rail line should be extended to Dunshaughlin during the lifetime of the Draft Plan with a park and ride facility provided. A new station should be provided at Bettystown and should have extensive park and ride facilities.</li> <li>4. It is considered that the infrastructure/location of the existing stations in east Meath are not adequate for the needs of commuters. It is requested that a long-term objective to include a rail connection towards Swords/Dublin Airport from the Dublin Belfast line should be outlined.</li> <li>5. Additional infrastructure for bus related public transport should be provided including the provision of bus lanes and park and ride facilities. It is considered that the Draft Plan does not adequately address this and objective for park and ride facilities should be included in the Draft Plan.</li> <li>6. It is considered that the M1 and the M3 are underutilised with regard to providing public transport. In light of the fact that the provision of additional rail capacity is unlikely to facilitated in the lifetime of the Draft Plan, it is considered that additional bus capacity should be provided on the motorway corridors noted above. Park and ride facilities should be provided in line with the above.</li> <li>7. It is considered that the construction of the N33 between the M1 and Ardee has resulted in there being no need for a nation designation of the N2 from Ardee to Dublin. It is considered that there is no capacity for additional development in this area and due to the existence of the N33, the N2 is not used or inter-urban transport. A HGV ban should also be applied in Slane and this would resolve many of the issues in the area.</li> <li>8. It is considered that Stamullen does not meet the requirements of a "small town" designation. It is considered that with the development of housing over the last 20 years and the lack of public transport, additional housing units should not be provided at</li> </ol>	



Stamullen. It is also considered that the City North business park was built inappropriately and has no connection with Stamullen. Due to this and the lack of public transport, it is submitted that no additional development should be provided at this location.

9. It is submitted that the zoning of land at Maynooth Environs is contrary to RPO 4.35 of the EMRA RSES which seeks to provide a Joint Local Area Plan for Maynooth. It is also submitted that the Carton Demesne has a weak spatial relationship with Maynooth and as such the proposed zoning does not represent the appropriate sequential development of Maynooth. It is considered that the proposed “SMART Park” at this location is not appropriate and this has been noted in previous refusals by An Bord Pleanála. It is considered that the provision of Maynooth Objective 2 (Master Plan 2) would damage the historic woodland and as such the area should be zoned High Amenity,
10. It is considered that the infrastructure capacity of Rathmoylan has not kept pace with the development of the settlement between 1996-2016, then an additional 80 no. units should not be assigned to the location.
11. It is considered that as Navan does not have the capacity for additional public transport facilities, the level of population growth proposed is inappropriate. Furthermore, it is considered that the rail link cannot be achieved within the lifetime of the Draft Plan then Navan should not have Key Town Status.
12. It is considered that there is no additional capacity for population growth in the Southern Drogheda environs and as such additional zonings should be considered. It is noted that TII have questioned that level of growth at this location and this should be responded to.
13. HER OBJ 4 is noted and welcomed. It is, however, noted that An Taisce members have had issues accessing burial grounds due to restrictions by landowners. It is considered that an objective should be included to maintain and protect public rights of way to burial grounds as well as archaeological/heritage sites.
14. It is considered that the architectural heritage policy of Meath County Council is failing certain structures such as churches, vernacular farmhouses, village buildings, mills as well as industrial buildings. It is considered that a more proactive policy needs to be provided. An Taisce supports HER POL 23, however, it is considered that redundant churches, mills, industrial buildings as well as vernacular buildings should be included in this policy.
15. HER POL 28 and HER POL 38 are welcomed, however it is considered that these approaches should apply to all types of development including agriculture and any planning applications for new or extended farm buildings. It is considered that any development should have these proposals integrated into the development.
16. It is submitted that updated landscape and archaeological protection policies should be applied to the Boyne Valley World Heritage Site. Previously unknown archaeological features were identified during the drought of 2018. Enhanced policy measures including regulation of agriculture and other development is required to address this.
17. Section 8.9.6 of the Draft Plan is noted, however, it is considered that special policy provisions are required to protect and enhance existing woodlands in the County.
18. Section 4.28.5 of the Draft Plan to create a greenway for walking and cycling along the Boyne Navigation is welcomed.
19. It is submitted that the provision of data centres is an issue as this is a land use that has a particularly high energy requirement. It is considered that the facilitation of data centres as part of the Draft Plan is inappropriate due to the potential impacts on the climate as well as the energy network. In this regard, it is considered that such facilities should only be provided if the production of greenhouse gases can be addressed or mitigated.

#### **Chief Executive's Response**

The submission by An Taisce raises many issues which provide significant challenges for Meath County Council. The Chief Executive fundamentally agrees that the gross under



investment in public transport provision provides significant challenges for the County and the council in its ambition to provide and contribute to a low carbon economy. It should however be pointed out that the idealisms outlined in the submission cannot be delivered in the current development plan alone e.g. little or no zoning / development until such times as public transport is available. This would send out the wrong message in that Meath County Council is not open for business. In the current Draft Plan, a balance has been provided in terms of urban and rural development which will occur within the structured settlement framework of Chapters 2, 3 and 9. Through the CDP and Economic Strategy, the key aim is to provide more economic generating employment within County Meath to serve the resident population and significantly reduce commuting outside the County, and particularly within the Dublin Area. This aim cannot be delivered within one plan period but will however be achieved over a number of plan periods. Meath County Council welcome the opportunity to work with all Government Departments, Agencies, Bodies and An Taisce in achieving this aim.

1. Whilst the Council does not have a direct role in the provision of public transport services, it is actively promoting and facilitating the improvement of both bus and rail services both within and from County Meath and is committed to working in conjunction with all transport providers and stakeholders in terms of the delivery of a reliable, accessible and integrated transport network that supports the effective functioning of the county. Investment in public transport will also be a key priority in the new programme for government and Meath County Council will be guided by this new programme and its increased focus on the provision of public transport. The Draft Plan promotes walking and cycling as an alternative mode of transport and contains a suite of supportive policies in respect of such (MOV POL 17 to MOV POL 22 and MOV OBJ 25 to MOV OBJ 32).

It should be noted that Meath County Council must be consistent with the national land use and housing policy in its efforts to achieve affordable housing within the Dublin Metropolitan Area.

2. It has been noted in MH-C5-816 that the principle of the tiered zoning approach has been applied as part of the zoning of land outlined in the Draft Plan and insofar as practicable, Meath County Council have zoned lands in areas where there is a high-quality public transport system available. Given the public transport deficits faced by the county, the land use zonings must be guided by the transport resources available. In relation to development at Stamullen, it is the view of the Council that the vehicular access to/from Stamullen via City North Business Campus to the M1 interchange will not adversely affect the M1 Motorway Network and would be a necessary improvement to the circuitous route currently in place for users of this route.
3. The County Council is committed to achieving a greater live work community in our settlements thereby reducing the unsustainable commuting patterns currently faced by residents within the county. In doing so, the zoning of additional employment sites in accessible locations within the county is a key component of the overarching vision. Until a commitment to the extension of a rail service and broader bus service can be achieved, the county must work to increase its employment opportunities thereby providing alternative local employment opportunities and stem the flow of current commuting patterns reflected throughout settlements in Meath. The extension of the rail line to Navan and Dunshaughlin is strongly supported and is addressed as part of MOV POL 5, MOV POL 6 and MOV OBJ 3. In relation to park and ride facilities, it is noted that MOV POL 10, Section 5.7.3, MOV POL 14, MOV OBJ 15, MOV OBJ 16, MOV OBJ 17 and MOV

OBJ 20 all address the provision of park and ride facilities throughout the county. It should also be noted that MOV POL 7 supports the Dart Expansion programme. MOV OBJ 5 specifically addresses the provision of a station at Bettystown as part of the Draft Expansion programme and it is therefore considered that there are sufficient policies and objectives in the Draft Plan to support the provision of public transport in an effort to reduce commuter traffic.

4. It is noted that the location of stations along rail lines is a matter for Irish Rail and Meath County Council will continue to engage with Irish Rail to ensure the provision of adequate transport facilities such as the new station at Bettystown. In relation to the provision of a rail link from the Dublin – Belfast Rail line to Swords/Dublin Airport, it should be noted that such a rail link would be largely based in Fingal County Council’s functional area and as such it would be inappropriate for Meath County Council to include such a policy which actually applies to another county council’s functional area.
5. In relation to the provision of bus lanes, it is considered that the policies outlined in MOV POL 8 and MOV POL 9 would allow for the development of bus lanes throughout the county. The provision of bus lanes can only be undertaken in conjunction with the NTA and other relevant agencies as noted in these policies. As noted above, the provision of park and ride facilities is noted as part of MOV POL 10, Section 5.7.3, MOV POL 14, MOV OBJ 15, MOV OBJ 16, MOV OBJ 17 and MOV OBJ 20. In 2020, the NTA set up an Office in Ashbourne to specifically source suitable Park and Ride Facilities around the Country. Meath County Council will engage with this office when identifying suitable sites and considered the development of Park and Ride Facilities to be adequately covered in the Draft Plan.
6. The use of the M1 and M3 for additional public transport is a matter for public and private transport providers and stakeholders. Notwithstanding this, Meath County Council would support this approach and this is addressed as part of MOV OBJ 12 of the Draft Plan. Though the Council do not have a direct role in the provision of public transport services, it is actively promoting and facilitating the improvement of both bus and rail services both within and from County Meath and is committed to working in conjunction with all transport providers and stakeholders in terms of the delivery of a reliable, accessible and integrated transport network that supports the effect functioning of the county.
7. The designation of national routes is not a matter for Meath County Council to determine and in the absence of the Slane bypass or another alternative, it is not appropriate for Meath County Council to provide a HGV ban at Slane. It should also be noted that HGV’s travel east to west through Slane as well as north to south and as such the current national roads layout does not address all traffic needs in the Slane area. As such, the N2 Slane Bypass will go through a rigorous assessment process, and if approved, will provide an essential piece of infrastructure that will address a number of matters raised.
8. It should be noted that the population of Stamullen as well as the services and facilities that are provided in this location has led to the location being defined as a self-sustaining growth town. It is considered appropriate along with the policies designed to provide public transport across County Meath.
9. It is noted that the zoning of land as outlined in the Draft Plan is not contrary to RPO 4.35 as CS OBJ 11 provides for the development of this location. As noted in the response to EMRA (MH-C5-60) it is considered appropriate to zone the subject lands as outlined in the Draft Plan until a joint Local Area Plan for Maynooth is agreed between Meath and Kildare County Councils for Maynooth.
10. As noted above, the principle of the tiered zoning approach has been applied as part of the Draft Plan. The provision of necessary infrastructure has been considered prior to the allocation of population to each settlement and this has been undertaken in consultation

with infrastructure providers such as Irish Water, TII, NTA etc. Consequently, it is considered that Rathmoylan has sufficient infrastructure capacity to accommodate the level of growth proposed.

11. The level of growth proposed is considered consistent with the role of Navan as a key town, and indeed the County Town in Meath. Furthermore, the subject submission assumes that the delivery of units in Navan will result in commuting to Dublin. It should be noted that ED POL 3 supports the provision of live-work communities. It is considered that additional population will not lead to additional commuting and that the additional population growth should be considered within the wider context of the Settlement Strategy in the new Development Plan. It is considered that the level of population growth is consistent with regional and national policy. In relation to the Navan Rail line, Meath County Council have identified this as critical infrastructure and note that the provision of the rail line is the responsibility of Irish Rail. It should also be noted that the programme for government supports the provision of public transport infrastructure and there is a real possibility that the rail line could be commenced during the lifetime of the draft Plan. Policies such as MOV POL 5 and MOV POL 6 will facilitate this and as such the approach for Navan outlined in the draft Plan is considered appropriate.
12. It should be noted that CS OBJ 10 outlines the intention of providing a joint plan for Drogheda and it is considered that the zoning outlined in the Draft Plan is appropriate in the interim until a joint plan is finalised. It is noted that the EMRA RSES 2019-2031 envisages that Drogheda will have a population of 50,000 by 2031 and this is consistent with the designation of Drogheda as a Regional Growth Centre. The lands in the southern environs of Drogheda were already zoned in the current plan but the phase 2 zoning has been removed in the current plan to be consistent with the above growth strategy. In this regard, the confirmation of the existing zoning and population growth in the Southern Drogheda Environs is consistent with the EMRA RSES 2019-2031.
13. Meath County Council acknowledges your proposal, however, there is a concern with providing such an objective as part of the Draft Plan. To establish a public right of way a certain process must be followed and a demonstrable need provided for this right of way. Each are dealt with on a case by case basis. As such, it is not considered appropriate to include such an overarching objective as part of the raft plan without a detailed evidence base being available.
14. This matter is noted. The Draft Plan outlines policies and objectives that address the building types referenced (Section 8.7.3 and Section 9.12 refers).
15. This matter is noted. The Draft Plan outlines policies and objectives that address the matters referred to in Section 9.8 of the Draft Plan. It is also considered that the matter has been addressed as part of DM OBJ 116, however, it is considered that this objective should be moved within the chapter so as to have the effect of applying to all developments.
16. Meath County Council considers that the policies and objectives within the Draft Plan will protect the Outstanding Universal Value of the UNESCO world heritage site, Bru na Boinne. The National Monuments service regularly updates archaeology which is incorporated into the Meath County Council GIS system and utilised for assessing development proposals within the world heritage site. As such, it is considered that this matter has been addressed.
17. Meath County Council have previously undertaken a trees survey which is incorporated into Map 9.3 and Map 9.3.1. All significant and Heritage trees have been identified in these maps and they are supported by the provision ins HER POL 41, HER POL 42 and HER OBJ 37. As such, it is considered that this matter has been adequately addressed as part of the Draft Plan.
18. Noted and welcomed.

19. As noted in Section 4.8 of the Draft Plan, Meath County Council have worked closely with industry leaders to identify appropriate zoning to accommodate data centres in County Meath and as such these have been identified in the Draft Plan. It is noted as part of section 4.8 that Meath County Council will “continue to work with industry leaders and stakeholders in the identification of suitable sites for data centre development.”

In relation to then environmental concerns relating to data centres, it should be noted that Chapter 10 of the Draft Plan relates to Climate Change and throughout the preparation process WSP Consultants have provided guidance and advice on policies in relation to climate change effects. In this regard, it is considered that these matters have been adequately considered. It should be noted that the ‘Government Statement on The Role of Data Centres in Ireland’s Enterprise Strategy’ was prepared by the Department of Business, Enterprise and Innovation and published in June 2018. It was considered that the plan-led approach outlined in this document allows Ireland to optimize the benefits that these strategically important data centre investments can bring to our society.

Furthermore, it is noted as part of the Planning and Development (Amendment) Act 2018 that it is intended to include Data Centres of a certain scale as Strategic Infrastructure Development. As such it is considered that the above requested changes not necessary given that are contrary to national policy and any environmental impacts will be considered on a case-by-case basis as application are brought forward.

Change recommended: Vol. 1 Written Statement, Chapter 11, Section 11.6:

#### **11.6.4 Trees and Hedgerows**

**Trees and Hedgerows are an important consideration with all developments and it is considered that the retention of trees and hedgerows should be considered as part of any relevant planning application**

**Please refer to Section 9.8 Tree and Hedgerow Preservation for further details.**

#### **DM OBJ XX**

**Existing trees and hedgerows of biodiversity and/or amenity value shall be retained, where possible.**

Change recommended: Vol. 1 Written Statement, Chapter 11, Section 11.8.2:

#### **~~DM OBJ 116~~**

~~Existing trees and hedgerows of biodiversity and/or amenity value shall be retained, where possible.~~

All objective numbers to be updated on foot of the above changes.

<b>Submission No.:</b>	MH-C5-738
<b>Submitted by:</b>	Construction Industry Federation
<b>Submission Theme(s):</b>	Chapter 2 Core Strategy, Chapter 3 Settlement and Housing Strategy

### Summary of Submissions:

This submission relates to general town planning, matters primarily addressing the Core Strategy and the Settlement and Housing Strategy. These are addressed in turn below:

1. It is submitted that significant population growth parameters for the Regional Spatial and Economic Strategies for the periods to 2026 and 2031 have been set out through the NPF process its implementation arrangements, and as such are subject to constant updating and review as part of the new cyclical process of review and updating of the NPF. As such it is submitted that it is up to Planning Authorities to adequately assess reliable delivery within its functional zones. In this regard it is noted that the CIF engaged consultants to prepare research namely *“Comparing ‘as is’ scenario with respect to the NPF”* and *“Transitional guidance contained within the Eastern and Midlands Regional Assembly (EMRA) Regional Economic and Spatial Strategy (RSES) 2019-2031”*. These reports identified that the assurances and full scope of options available to Planning Authorities through the RSES for the EMRA not limited to provisions under section ‘Taking Account of Existing Development Plans’, namely page 50, should be utilised fully.
2. It is submitted that the proposed housing provision figures should be taken as a minimum figures for growth and not maximum figures. This has been addressed as part of the research that was undertaken on behalf of the CIF.
3. A full assessment of the existing zoned land bank within each local authority (including analysis of service capacity, needs and overall cost, infill/brownfield potential and patterns of housing delivery and output, and take up and completion of planning permissions) is necessary to comply with the transitional arrangements of the NPF.
4. The preparation of a comprehensive Housing Need Demand Assessment (HNDA) as required by the NPF (and RSEs) which accounts for these market issues is meant to inform land use decisions in each planning area and to guide active land management strategies. The absence of guidance on HNDA’s can lead to wildly varying interpretations by local authorities in the interim which is likely to be inconsistent.
5. Where figures appear to have been correctly applied (as done in Meath), slight variations in the average household size, projection years or assessments of existing housing stock can wildly effect demand projections.
6. Greater understanding and acknowledgement of the longstanding barriers to housing delivery across the country (which are not limited to the perceived ‘land hoarding’ addressed by the Vacant Site Levy) is also needed. Difficulties arise when engaging with utility and other service providers, meeting complex finance arrangements and satisfying compliance requirements for construction (amongst other factors), which can unnecessarily extend the delivery timeline for housing.
7. With respect to the allocation of residential lands within the recently proposed Plans and Variations, there is insufficient rationale provided in the Draft Plan for Meath (and other Plans) as to why certain areas are more likely to be delivered and have thus been zoned without phasing. It is counterintuitive to reduce the amount of available residential land in a housing crisis.
8. The substantial downzoning or ‘de-zoning’ of previously identified residential lands evident in Meath is against NPF policy and represents significant investment in land banks for development that cannot be fully realised and has the potential to further undermine the fragile development market, which relies on investor confidence.

### Chief Executive’s Response

1. The Draft Plan has been prepared in line with the provisions outlined in the NPF and RSES and addresses measures such as those outlined in Taking Account of Existing Development Plans noted in the NPF. The Core Strategy, particularly Sections 2.6, 2.7, 2.8,

2.9 and 2.10 addresses this matter as well as the other matters considered during the preparation of the Core Strategy. Having reviewed the associated documents submitted by the CIF, it is noted that these matters have been addressed as part of submissions no. MH-C5-629 and MH-C5-753. As such it is considered that the Core Strategy has been prepared appropriately as outlined in the response to the OPR submission MH-C5-816.

2. The implementation of the core strategy will be undertaken in line with the provisions of the Planning and Development Act 2000, as amended, the Planning and Development Regulations 2001, as amended, as well as the provisions outlined in the NPF, RSES and the updated development plan guidelines that are to be prepared by the Department of Housing, Planning and Local Government. As part of the Draft Plan, Section 2.10.4, it is noted that the proposed figures will not be addressed as 'targets' but will be considered as a guide to the expected level of development. Beyond this it would be inappropriate to define the core strategy figures as "minimum" figures unless this is defined at a national level.
3. As part of the preparation of the Draft Plan the review of all lands has been undertaken and residential development land has been zoned in accordance with the principles of the tiered zoning approach as well as ensuring that there is sufficient lands for other forms of development i.e. community infrastructure, enterprise and employment, etc. This matter is addressed as part of the response to the OPR (MH-C5-816).
4. As noted in the response to the OPR submission (MH-C5-816) a HNDA has not been prepared at this time due to the lack of guidelines on this matter. It is noted as part of the abovementioned response that a HNDA will be prepared as part of the review of the Housing Strategy. This matter should, therefore, be addressed over the lifetime of the development plan.
5. These matters have been addressed as part of the preparation of the Draft Plan as well as in the response to the OPR (MH-C5-816). In this regard, it is considered that the Draft Plan has been prepared in compliance with national and regional planning policy.
6. It is considered that the matters relating to the delivery of dwellings has been addressed as part of the Draft Plan and this has been addressed as part of the response to the OPR (MH-C5-816).
7. The zoning of land has been undertaken in line with the sequential approach as well as applying the principle of the tiered zoning approach, as noted in the response to the OPR (MH-C5-816). It is also considered that there is sufficient lands zoned in line with national and regional planning policy. As part of the Draft Plan there will be ongoing monitoring of the core strategy implementation(refer to MH-C5-629 for amended CS OBJ 3) and if necessary variations to the development plan can be undertaken in the future.
8. As part of preparation of the Draft Plan a review of all lands was undertaken as noted and requested above as part of the submission made by the CIF. In this regard, the option of de-zoning land was considered appropriate. It should be noted that the response to the OPR (MH-C5-816) addresses the zoning of land and that the OPR considered the Core Strategy was largely consistent with the provisions of the National Planning Framework as well as the relevant Regional Spatial and Economic Strategy for the area. As such, it is considered that the Draft Plan and the amendments outlined as part of the Chief Executive Report are appropriate.

#### **Chief Executive's Recommendation**

No change recommended

**Submission No.:**

MH-C5-753



<b>Submitted by:</b>	Richmond Homes
<b>Submission Theme(s):</b>	Chapter 2 Core Strategy
<b>Summary of Submission:</b>	
<p>There are a number of matters raised as part of the Richmond Homes submission and these are addressed below in turn:</p> <ol style="list-style-type: none"> <li>1. It is respectfully submitted that there is an inconsistency between the population figures outlined in the NPF and the obligation of a Planning Authority to provide for housing needs. It is considered that the adopted Plan should reflect the up-to-date position in relation to population growth and housing needs in 2020 and in particular the short to medium-term demand. The CSO estimates a national population of 4.921m persons in April 2019 which represents an annual rate of increase of 1.3% compared to 0.96% used in the NPF, equating to an additional 0.385m persons over the NPF projected higher population figure. It is submitted that if this rate of population growth is applied it will lead to a figure of 6.372 million people by 2040 compared to the NPF figure of 5.7 million. In this regard the projections outlined in the National Planning Framework, the NPF Implementation Roadmap and the Regional Spatial and Economic Strategy should not be relied upon.</li> <li>2. It is also noted that as outlined in NPO 37 of the National Planning Framework a Housing Need Demand Assessment should be provided as part of the Draft Plan. It is considered that without this being prepared there is a underestimation of population growth that would be identified in the Housing Need Demand Assessment. It is submitted that there are not enough housing units being delivered and that the pent up demand as indicated by a high occupancy rate should be considered.</li> <li>3. It is also considered that the delivery of compact growth will lead to higher densities necessitating that more apartments are built. As apartments typically have a lower occupancy this will lead to additional units being required which should be considered as part of the Draft Plan.</li> <li>4. It is noted that the Development Plan Guidelines 2007 allow for an additional 50% of zoned land to be required so as to ensure that there is sufficient land available for the county over the development plan period. Whilst the NPF Implementation Roadmap indicates that this may not be required it is considered that given the discrepancy between the NPF figures and the CSO figures that this additional 50% zoning should be provided.</li> <li>5. It is noted that Section 10 (1a) of the Planning and Development Act 2000-2020 requires that the core strategy shall comply with national/regional population figures "<i>as far as practicable</i>". It is submitted that given the discrepancy between the CSO and NPF figures, the contents of the Section 28 Development Plan Guidelines noting that at least nine years of development land should be provided as part of a core strategy, as well as Section 95(1) of the Planning and Development Act 2000, as amended, requiring that there should not be a scarcity of development land, it is considered that additional lands should be zoned as part of the Draft Plan.</li> <li>6. It is also submitted that given that there is a gap in the supply and demand for housing, as outlined in Rebuilding Ireland as well as other documents, as well as there being an expected increase in demand for housing as noted by IBEC, the Central Bank and AIB, the provision of additional housing units as part of the Draft Plan should be considered.</li> </ol>	
<b>Chief Executive's Response</b>	
<ol style="list-style-type: none"> <li>1. Based on the above, this approach would be inconsistent with National legislation, the NPF and RSES for the EMRA Region. As such, it would not be appropriate to amend the</li> </ol>	

Draft Plan as required. It should however, be noted that an updated Table 2.11 is provided as part of the response to the OPR submission MH-C5-816. Whilst this submission provides a population projection up to 2040 of 6.372 million people, it should be noted that this is not consistent with even the most optimistic population projections provided by the CSO for 2040 and as such it is not considered appropriate to amend the approach to the core strategy as requested.

2. In relation to this matter, it should be noted that as part of the Planning and Development Act 2000, as amended, it is a requirement of Section 9(1) of this Act that a development plan is prepared every six years. This Act also specifies as part of Section 10(2)(a) that the development plan shall include the zoning of lands for a particular use. When these provisions are combined with the requirement to be consistent with regional and national policy, it outlines a necessity for the Draft Plan to be prepared and lands to be de-zoned or rezoned. Meath County Council are not in a position to wait for the publication of updated development plan guidelines and as such the Draft Plan has been prepared in line with the requirements of the most up to date legislation as well as the most up to date guidelines. In relation to the pent up demand and the currently high occupancy rate, it is noted that this has already been factored into the Draft Plan as noted in Section 2.6, Section 2.94 and Section 3.8.2 of Vol. 1.
3. Whilst the delivery of compact growth may lead to higher densities it is considered that the average occupancy rate for the county predicted at 2.5, as outlined in Section 2.9.5 of Volume 1 of the Draft Plan takes account of both the pent up demand as well as any potential lower occupancy rates as part of apartments. This matter has been addressed as part of the response to the OPR (MH-C5-816).
4. As noted in the NPF Implementation Roadmap, additional headroom has already been applied to the figures outlined in the NPF and as outlined in Section 2.3.2.1. As such utilising the provisions of the Development Plan Guidelines to allow for the over zoning of land by 50% would be inappropriate given the significant headroom already provided to the population figures.
5. The Draft Plan has considered the requirements of the Planning and Development Act 2000, as amended, as well as the guidelines mentioned and it is considered that the proposed population growth and housing supply is consistent with all of the above. It is not considered that there is a need to diverge from the population projections outlined at a national level.
6. It is considered that the proposed approach of population growth and zoning will allow for the delivery of appropriate housing units. Furthermore, the application of the Active Land Management Strategy will also allow for the release of land. Meath County Council will be monitoring the implementation of the Draft Plan and should changes be required in the future, this can be considered in the context of planning legislation and national guidelines in place at that time. Both of these matters have been addressed as part of the responses to the OPR (MH-C5-816).

#### **Chief Executive's Recommendation**

No change recommended.

<b>Submission No.:</b>	MH-C5-772
<b>Submitted by:</b>	Louth County Council
<b>Submission Theme(s):</b>	Chapter 2 Core Strategy
<b>Summary of Submission:</b>	



This submission relates to a number of matters outlined in the draft Plan and these can be summarised as follows:

1. The Council welcomes the inclusion of objectives CS OBJ 10 in the Core Strategy and STH DRO OBJ 1 in the Written Statement for the Southern Environs of Drogheda relating to the preparation of a Joint Urban Area Plan for the Regional Growth Centre of Drogheda in accordance with the requirement of objective RPO 4.11 of the RSES. The Draft Plan also acknowledges the strategic location of Drogheda along the Dublin-Belfast Economic Corridor and its potential to act as one of the principle drivers for economic growth in the Region. The concentration and clustering of businesses and enterprises along this Corridor and in particular the Regional Growth Centres of Dundalk and Drogheda will assist in creating centres of scale that have the capacity to accommodate significant population growth and economic investment.
2. The Draft Plan has projected a population increase of 3,300 persons in the Southern Environs of Drogheda by 2026. This equates to a 49% increase in the population of the Southern Environs, which was 6,757 persons in 2016. The total population of Drogheda in 2016 was 40,956 persons. The RSES projects that in 2031 the population of Drogheda will be 50,000. Whilst it is acknowledged that this figure of 50,000 is not a cap on population, it is unclear if the population projection for the Southern Environs in the Draft Plan has taken cognisance of the RSES figure. Clarity should be provided in this regard.
3. Louth County Council would have concerns with the quantum of lands zoned for residential use in the Southern Drogheda Environs being 178 hectares of land. This appears to be significantly in excess of that required to meet the projected population in the plan period. The rationale for making all these lands available for development and not including a 'strategic reserve' of residential lands is unclear and should be addressed. Whilst monitoring has also be noted, more details would be required on this matter. Given that a timeframe for preparing the Joint Plan has yet to be agreed it is critical that a robust strategy is put in place that manages growth in the area and ensures that the level of development permitted does not undermine the long term growth strategy of the settlement to be agreed as part of the Joint Plan.
4. Louth County Council welcome objective MOV OBJ 1 which supports the preparation of a Local Transport Plan for Drogheda. In the interests of clarity it is suggested that a reference to the preparation of this Local Transport Plan is made in the Written Statement for the Southern Environs of Drogheda. Objective BLMD OBJ 9 in the Written Statement for the East Meath Settlements supports the preparation of a Transport Study for East Meath and South Drogheda in association with Louth County Council. The Council would welcome an involvement in this Study which would provide a framework for investment in transport in this densely populated location.
5. Drogheda Port is an important economic asset to the town and its regional significance is highlighted in the RSES with Regional Policy Objective 4.12. The future development of the Northern Environs of the town and the redevelopment of the port area is closely linked to the construction of the Port Access Northern Cross Route. It is requested that the Written Statement for the Southern Environs of Drogheda acknowledges the importance of the Port Access Northern Cross Route in the future development of the town.
6. Louth County Council welcomes the policies supporting the DART expansion programme including the electrification of the northern rail line to Drogheda as this would significantly improve connectivity and the frequency of trains between Drogheda and Dublin.
7. Taking account of the benefits of the N52 Ardee Bypass to the wider region, in addition to the fact that this these works will transcend into Meath for a short distance, the Council

would welcome an objective supporting the upgrade of this road. The following is a suggested wording for this objective:

*“To support and facilitate the delivery of the Ardee bypass and to prohibit development along any selected route that could prejudice its future delivery.”*

8. Louth County Council welcomes the recognition of the importance of tourism to the local economy and the support given to the implementation of this Strategy in the Draft Plan (ED POL 38) particularly the Boyne Valley Tourism Strategy.
9. The international significance and archaeological importance of the Brú na Bóinne World Heritage Site is recognised. Louth County Council will continue to support and work in partnership with Meath County Council and other agencies in promoting, conserving, and managing the UNESCO World Heritage Site of Brú na Bóinne.

#### Chief Executive's Response

1. This is welcomed and acknowledged. Meath County Council look forward to working with Louth County Council on the preparation of the Joint Urban Area Plan for Drogheda.
2. Having reviewed the provision of the NPF and the RSES, it is considered that this approach is consistent with the development of Drogheda as well as regional and national planning strategies. It is also noted that this matter can be reviewed as part of the preparation of the Joint Plan for Drogheda.
3. It has been considered that the phasing or de-zoning of land in the absence of a joint plan would be premature and as such it is considered that the zonings outlined in the draft Plan are appropriate at this time. As per CS OBJ 3, it is noted that the Planning Authority will ensure the implementation of the Core Strategy and as such this should be sufficient until the joint plan is agreed between Meath County council and Louth County Council. It is also noted that this matter has been considered as part of the response to the OPR (MH-C5-816) as well as EMRA (MH-C5-60)
4. Meath County Council welcome Louth County Council's willingness to engage on a local transport plan. It is agreed to incorporate an objective for the preparation of a Transport Plan into the Written Statement for the Southern Environs of Drogheda under Vol. 2 of the Draft Plan. Please refer to TII submission for further details (MH-C5-112).
5. This matter has been addressed as part of the submission by the Drogheda Port Company and it is intended to include an objective similar to RPO 4.12 as part of the Draft Plan.
6. This point is welcomed and acknowledged. Meath County Council are of the view that the improvements to the Dublin-Belfast rail line, particularly up to Drogheda will provide for the implementation of ED POL3 which encourages Live-work communities.
7. It is agreed that an objective to support the N52 Ardee Bypass should be incorporated in the Draft Plan.
8. This is welcomed and acknowledged. Meath County Council look forward to working with Louth County Council on the promotion of Boyne Valley Tourism.
9. This is welcomed and acknowledged. Meath County Council look forward to working with Louth County Council on the implementation of the management framework for the UNESCO World Heritage Site.

#### Chief Executive's Recommendation

Amend Vol. 1, Chapter 5, Section 5.9.2 to incorporate objective after MOV OBJ 48 as follows:

**MOV OBJ XX: “To support and facilitate the delivery of the Ardee bypass and to prohibit development along any selected route that could prejudice its future delivery. This project will**

**be subject to the outcome of the Appropriate Assessment process.”**

No further recommendations

<b>Submission No.:</b>	MH-C5-814
<b>Submitted by:</b>	Ronan Moore
<b>Submission Theme(s):</b>	Chapter 2 Core Strategy
<b>Summary of Submission:</b>	
This submission seeks the inclusion of a policy as follows:	
1. "To carry out a midterm evaluation of the Development Plan, specifically focusing on the achievement and realisation of objectives throughout the Plan."	
<b>Chief Executive's Response</b>	
1. It is noted that as per Section 15(c) of the Planning and Development Act 2000-2020, not more than 2 years after the making of a development plan the Chief Executive must prepare and present a report to the members of the authority on the progress achieved in securing the objectives. As suggested, it would then be inappropriate to undertake a further review 1 year later. Based on the above it is not considered necessary to amend the Draft Plan in this regard.	
<b>Chief Executive's Recommendation</b>	
No change recommended	

<b>Submission No.:</b>	MH-C5-837
<b>Submitted by:</b>	Fianna Fail Group
<b>Submission Theme(s):</b>	Chapter 2 Core Strategy
<b>Summary of Submission:</b>	
The Meath Fianna Fail County Councillor's wish to implement the following policy into the Meath County Development Plan 2020-2026:	
<i>"Meath County Council implements structured transition periods for existing Residential Phased Land II (Post 2019) from the 2013 -19 development plan which is now de-zoned in the Draft Meath County Development Plan 2020-2026 Plan to agriculture land.</i>	
<i>As detailed in the National Planning Framework, phasing and transition periods must be embraced regarding the long-term considerable ambition and flexibility to be built into Regional Spatial and Economic Strategies to guide county development plans and local area plans.</i>	
<i>Therefore, all Residential Phased Land II (Post 2019) in the 2013 –19, Meath County Development Plan development plan is now reinstated into the Meath County Development Plan 2020-2026. This reinstatement will greatly assist the housing crisis within the county and the Eastern and Midlands Region and enable the strategic growth of the county."</i>	

**Chief Executive's Response**

Adopting such an approach would be contrary to the provisions of Section 10(1A) of the Planning and Development Act 2000, as amended, the provisions of the National Planning Framework, the Regional Spatial Economic Strategy, Development Plan Guidelines 2007 as well as the proposed planning and sustainable development of the county. The zoning of land in this Development Plan has been undertaken following detailed analysis and modelling which have provided a strong evidence base which forms and basis of the existing Settlement Framework both in urban and rural areas throughout County Meath. This settlement and growth strategy are in accordance with the provisions of the above documents and adopting the proposed amendment would be inappropriate and will lead to a ministerial direction under S 30 /31 of the P & D Act 2000 (as amended) due to inconsistencies between the County CDP and RSES and NPF.

**Chief Executive's Recommendation**

No change required.

<b>Submission No.:</b>	MH-C5-852
<b>Submitted by:</b>	Thomas Byrne TD
<b>Submission Theme(s):</b>	Chapter 2 Core Strategy
<b>Summary of Submission:</b>	
<p>There are a number of matters raised as part of this submission and these are addressed below in turn:</p> <ol style="list-style-type: none"> <li>1. It is requested that the Draft Plan facilitates an increase in local services such as housing, schools, health care and recreational facilities for communities in County Meath due to population growth that has occurred over the past 10 years. It is noted as important that these services, as well as broadband, are provided in line with population growth.</li> <li>2. The submission notes disappointment with the proposed Rural Development Strategy which is viewed as discouraging people from living in rural areas. It is requested that this strategy is reviewed including the 25 acre proposal for local needs.</li> <li>3. It is noted that recreational facilities are required in larger settlements such as Ashbourne. Open space in Ashbourne is particularly required and it is also highlighted that Stamullen requires a playground.</li> <li>4. It is submitted that local services, such as childcare facilities should be provided as part of any development in towns or villages.</li> <li>5. The Draft Plan should provide for rural villages to thrive.</li> <li>6. It is requested that additional rural nodes are provided including Kilbride, Kilmoon and Mulhussey.</li> <li>7. It is requested that Meath County Council engage and assist small and medium enterprises. Meath County Council should also continue to attract Foreign Direct Investment companies such as Facebook.</li> <li>8. A part of supporting small and medium enterprises it is requested that measures such as on street parking are reconsidered.</li> <li>9. It is requested that Meath County Council engage with local communities and ensure that potential tourism sites, including heritage sites, are maximised. Additional facilities should also be provided at the Hill of Tara site. These facilities should include toilets and parking.</li> <li>10. It is requested that a plan is developed for the Bru na Boinne site to ensure the protection</li> </ol>	

of the area whilst allowing for locals to continue to live in the area.

11. Continuing improvements in Kells are required and this includes the provision of signage and access to the Round Tower for tourists.
12. It is requested that an examination of the N2 is undertaken as there are concerns that the road is inadequate and continues to be unsafe. This should include the provision of the Slane bypass as well as a solution to the Primatestown junction. Solutions should be provided in conjunction with the Department of Transport and the NTA.
13. It is also noted that the extension of the train line to Navan must be delivered. As part of this it is requested that Meath County Council consider the provision of a station at Ratoath as well as extending the line to Kells. It is considered that these options would improve the rail line. As part of the delivery of this line further park & ride facilities should also be considered, given the success of the existing park & ride.
14. It is considered that the Gormanstown rail station has been downgraded by the high cost of the rail fares. It is considered that Gormanstown should be included in the short hop zone area as it is similarly distanced from Dublin as other stations in the short hop zone. It is also noted that Gormanstown provides a public transport option for Stamullen.
15. It is considered that more needs to be done in relation to electric charging points and towns and villages be identified for the provision of charging points.
16. It is noted that the deposit of almost one year's quota of waste at the Knockharley facility in Kentstown without any consultation with the public is considered unacceptable. It is submitted that this facility has a number of nuisance impacts on neighbours. It is also submitted that this decision has an unfair impact on the upcoming planning decision on the potential expansion of the facility. It is considered that Meath County Council should address this matter head on. Meath County Council should also address waste disposal issues in Duleek and Kilcock.
17. Meath County Council should implement a policy in relation to dealing with planning applications for wind farms and solar farms. It is noted that there are currently no national guidelines in relation to such applications and as such Meath County Council should adopt an approach to these applications.
18. It is requested that open spaces within housing estates that are still zoned for development should be reviewed.
19. It is also requested that the manner in which the 15% open space calculation is undertaken for housing developments is considered as there are a number of housing developments which have inadequate green open spaces.
20. The Duleek local community is supported in seeking and Environmental Protection Office.
21. It is requested that Meath County Council support the provision of a Garda Station in Ratoath.
22. It is considered that traffic calming and road safety measures are required around schools and a plan in relation to this should be prepared. This should consider safe zones and no idling zones.

#### **Chief Executive's Response**

1. Meath County Council support the provision of local services as well as essential infrastructure as outlined in the submission. It is noted that the provision of such infrastructure is undertaken by third parties, typically either national infrastructure providers or government agencies. It is considered that the policies and objectives outlined as part of the Draft Plan, including the zoning objectives, facilitate the provision of the services and Meath County council will continue to work with these third party providers in facilitating the delivery of these services. The drafting and creation of 15 Local Area Plans across the various settlements will also assist in the identification and

delivery of the necessary infrastructure.

2. It is noted that there have been hundreds of submissions on rural housing policy and nodes. A revised version of the Rural Settlement Strategy has been prepared and is recommended that this document is amended. A revised version of this document is attached at Appendix G of this Report.
3. It is noted that there has also been hundreds of submissions about open space in Ashbourne and such matters have been considered as part of the CE report in Section 3 – bulk submissions
4. As noted above, it is considered that sufficient policies and objectives, including land use zoning objectives are provided to allow for the delivery of childcare facilities. As part of the Draft Plan Section 7.7.3.3 addresses this matter and SOC POL 5 & 6 outline the requirement for these to be delivered as part of residential developments. As such it is considered that this matter has been addressed as part of the Draft Plan.
5. This point has already been incorporated into the Draft Plan as per RUR OBJ 4. As such no change is required to the Draft Plan.
6. It should be noted that Kilbride and Ashbourne are identified settlement centres in the Settlement Strategy. Please refer to Volume 2 Kilbride Written Statement in this regard. With regard to node requests, the designation of additional Rural Nodes within the County would represent a piecemeal uncoordinated approach for designating additional land for which there is no evidence-based need. The existing nodes have been strategically chosen to cover all spatial areas of the County to provide alternative locations for one off houses in the countryside. The quantum and location of land identified for development in the County is directly influenced and structured by the Development Plan's Settlement and Core Strategy. Based on the evidence-based approach adopted in the Core Strategy for the County, it is clear, that Meath has a significant and sufficient quantum of land designated to meet the regional targets for the Development Plan period. There are lands designated in existing rural villages and rural nodes that are sufficient in area to accommodate local rural based housing need across the County. (Please also refer to submission no. MH-C5-14, Chapter 9 Rural Development Strategy for additional information in this regard).
7. These matter are addressed as part of Chapter 4 Economic and Employment Strategy where it is noted that small and medium enterprises will be facilitated (ED POL 4) and that the Economic Development Strategy for Meath will be supported as part of the Draft Plan which includes attracting foreign direct investment (Section 4.5 Chapter 4 Economic and Employment Chapter and ED POL 2).
8. In relation to parking, it should be noted that parking standards are outlined in Chapter 11 Development Management Standards and Land Use Zoning Objectives. With regard to on-street parking and the operation of same, it is not considered that the County Development Plan or the CE Report is the appropriate vehicle to address it. Such a matter can be addressed with the Transportation Department of Meath County Council or through the Municipal District Office.
9. As part of the implementation the Draft Plan it should be noted that ED POL 71 outlines that Meath County Council can facilitate and support in the implementation of Village Design Plans and other community led projects to enhance village environments that have been prepared through a public consultation process whilst ensuring that such Plans are consistent with adopted Local Area Plans for such centres and town/village development objectives contained in the County Development Plan. It is considered that this policy will allow for Meath County Council to engage with local community groups to improve potential tourism sites as well as heritage sites. Furthermore, ED POL 41 provides support for the development of new tourist facilities or upgrading/ extension of existing tourist facilities at tourist sites within the County such as the Hill of Tara. In this



- regard, it is considered that this matter has been addressed as part of the Draft Plan.
10. In relation to this matter it is noted that the County Development Plan provides policies and objectives with regard to the provision of residential dwellings throughout the county and as such this matter has been addressed in the Draft Plan. In this regard, it is advised that the submission author refers to HER POL9, HER POL 10, HER POL 11 and HER OBJ 12. These policies refer to the consideration of planning applications for residential dwellings, the extension of existing residential dwellings, the implementation of the Brú na Bóinne Management Plan 2017 and the preparation of a business plan for World Heritage Site in conjunction with relevant stakeholders, subject to funding. As such it is considered that this matter has been adequately addressed in the Draft Plan.
  11. In relation to Kells it is considered that the Settlement Strategy for Kells outlined as part of Volume 2 of the Written Statement provides for the continued improvement of Kells with a specific number of policies provided as part of this statement that will improve Kells. In relation to the provision of tourist signage, it should be noted that ED POL 43 provides that Meath County Council will work with all relevant stakeholders and Fáilte Ireland to facilitate the erection of standardised signage for tourism facilities and tourist attractions as part of National and Regional initiatives. As such it is considered that this matter has been addressed as part of the Draft Plan.
  12. The National Development Plan makes particular reference to and prioritises the upgrade to the N2 from Rath Roundabout to Kilmoon Cross section of road. The Draft Plan, Chapter 5, Section 5.8.3 highlights the important role of the N2 corridor. The delivery of these works will continue to be supported and facilitated by the Council and the Council will seek the delivery of the Slane Bypass in the future in conjunction with TII and the Department of Transport, Tourism and Sport. MOV OBJ 31 is set down to ensure continued support for upgrades to the N2 as follows: 'To continue to support and facilitate TII, Fingal County Council, Louth County Council and Monaghan County Council in the planning and delivery of upgrades to the N2, as appropriate'.
  13. The provision of a rail line from Pace (M3 Parkway) to Navan remains a key objective of the Council. The published RSES includes for the reappraisal of the extension of the Dunboyne/M3 Parkway line to Dunshaughlin and Navan. The Draft Plan maintains a strong policy stance to ensure that the detailed designed alignment is protected from further development and that this protection also extends to potential stations along the route. However, the delivery of the Dunboyne-Navan rail line is not within the control of the Council. It is also the objective to promote and support the provision of Park-and-Ride facilities which improve public transport, as reflected by MOV POL 13 of the Draft Plan. The Council will work with the newly formed Park & Ride Office to establish suitable locations for Park and Rides and deliver these within the lifetime of the Plan.
  14. The Council remains committed to working with Irish Rail to support an extension of the short hop zone pricing structure as set out in MOV OBJ 6 of the Draft Plan as follows: 'To encourage and work in conjunction with Irish Rail to review the operation of the Short Hop Zone (SHZ) rail prices with an extension to stations in Laytown, Gormanston and Enfield'.
  15. The Council will liaise and collaborate with relevant agencies in order to support and encourage the growth of electric vehicles (including EBikes) with support facilities/infrastructure, through a roll-out of additional electric charging points at appropriate locations in the County. This objective will also include the retrofitting of charging points in existing urban centres and park and ride facilities throughout the County where there is sufficient demand (MOV OBJ 20 and MOV OBJ 21 in Chapter 5 of the Draft CDP refers).

16. In relation to the waste facility at Knockharley, as far as the planning authority is aware the facility is operating within the restrictions of the licence issued under Waste Management legislation and the within the confines of the conditions outlined in the relevant planning permission. In terms of planning irregularities, if there is a concern that there has been a breach of planning at this location, this can be reported to the Planning Enforcement Section. It is not considered that the county development plan or the CE Report is the appropriate vehicle to address a breach of planning or a waste licence.
17. Policies and objectives promoting energy efficiencies and the development of indigenous resources will be pursued during the lifetime of this plan. National Energy Policy White Paper – Irelands Transition to a Low Carbon Energy Economy (Department of Communications Clime Action and the Environment 2015-2035). This national energy policy framework was developed in the context of the significant role played by European institution in determining energy policy, markets and regulation. It takes account for European and international climate change objectives and agreements, as well as Irish social, economic and employment opportunities.

The most up-to-date Government guidance on this matter remain the '*Wind Energy Developments Guidelines for Planning Authorities, 2006*'. In December 2019, the DoHPLG published a draft Revised Wind Energy Development Guidelines, for which the responses will inform the final Guidelines. To date, given that the Department has not finalised its review of the current guidelines, the guidelines remain in full effect, and the Planning Authority must be consistent with the standards set out in same.

Having regard to the imminent publication of national guidelines, it would be premature to publish a Renewable Energy Strategy at this stage incorporating policies for either wind or solar power applications. Publication of a Strategy at this stage would be likely to result in the revision and reconsideration of the Strategy once the revised Wind Energy Guidelines are published and it is considered that the Draft Plan has appropriate policies and an objective in place to manage wind energy developments in the county interim. Notwithstanding this, it will be an objective of the Council to prepare a Renewable Energy Development Strategy, and to publish same as a variation of the CDP, following the completion of the Departments review of the above Guidelines.

This is considered the most reasonable and balanced approach to managing future wind energy development proposals in the county whilst also complying with Government policy on the matter.

18. This matter has been considered as part of the Draft Plan and in this regard it is recommended that submission no. MH-C5-45, 48, 407, 427, 692, 744, 2100-2450 Vol. 3 of the Chief Executive Report is referred to, where additional land is being zoned for open space in a housing estate. Where the maps are not reflective of open space this can be due to the planning permission only being recently granted and up to date data not being available. As such it is considered appropriate to address this matter as part of the Local Area Plan process.
19. There is an increasing focus on the quality of public open space, which ensures that the reasonable expectations of users are more likely to be fulfilled. The qualitative standards set out in the Sustainable Residential Development in Urban Areas, 2009 relating to design, accessibility, variety, shared use, biodiversity, SuDs and the provisions of allotments and community gardens should be adhered to in all planning applications for new residential developments.



20. DM OBJ 34 of the CDP requires open space to be provided for residential development at a minimum rate of 15% of the total site area. In all cases lands zoned for F1 Open Space, G1 Community Infrastructure and H1 High Amenity cannot be included as part of the 15%. Each residential development proposal shall be accompanied by a statement setting out how the scheme complies with this requirement.
21. The Draft Plan, Chapter 5 Movement Strategy includes a policy MOV POL 25 which is set down 'to implement the actions of the Meath Road Safety Strategy and promote road and traffic safety measures in conjunction with Government Departments, the Road Safety Authority and other agencies'. This applies to the county as a whole.
22. Policies and objectives promoting energy efficiencies and the development of indigenous resources will be pursued during the lifetime of this plan. National Energy Policy White Paper – Ireland's Transition to a Low Carbon Energy Economy (Department of Communications Climate Action and the Environment 2015-2035). This national energy policy framework was developed in the context of the significant role played by European institution in determining energy policy, markets and regulation. It takes account for European and international climate change objectives and agreements, as well as Irish social, economic and employment opportunities.

#### **Chief Executive's Recommendation**

No changes recommended

<b>Submission No.(s):</b>	MH-C5-895
<b>Submission by:</b>	Clr Sharon Keogan & Amanda Smith
<b>Submission Theme(s):</b>	Retention of phase 2 housing lands
<b>Summary of Submission:</b>	
That the Phase 2 zoning included in the CDP 2013-2019 that is proposed to be de-zoned is described as post-2026, rather than de-zoning	
<b>Chief Executive's Response</b>	
<p>The quantum of lands identified for residential development in a Development Plan is closely linked to the projected population growth and future household requirements. The Implementation Roadmap for the NPF published in July 2018 sets out the population projection for each County for 2026 and 2031.</p> <p>The Planning and Development (Amendment) Act 2010 introduced a requirement to prepare a Core Strategy as part of the Development Plan. This resulted in a more evidence based approach being taken to land use zoning for residential use with greater consideration to be given to projected population of the settlements, the 'sequential tests', and availability of services.</p> <p>As part of the preparation of the Core Strategy and Settlement Strategy in the Draft Plan, an analysis of residential activity and the quantum and location of zoned land in the County has been carried out. This analysis identified an excess of residentially zoned lands, a significant proportion of which has been zoned since 2001 when there was less alignment between population growth and residential land requirements.</p> <p>With regard to recent development activity in the construction sector it is evident that as the economy began to recover in 2014, household completions began to increase, albeit from a low</p>	

base. Nonetheless there has been a steady increase in output with year on year increases since 2014.

It is recognised that there is a 'pent up' demand for housing in the County and it will take a considerable period of time for housing supply to meet demand. This has been factored in to the calculation of future households and residential lands during the plan period.

**Chief Executive's Recommendation**

No change recommended.

<b>Submission No.(s):</b>	MH-C5-896
<b>Submission by:</b>	Cllr Sharon Keogan & Amanda Smith
<b>Submission Theme(s):</b>	Retention of phase 2 housing lands
<b>Summary of Submission:</b>	
That an opportunity is given for a planning application to proceed on Phase 2 lands where services are available that are proposed to be de-zoned in the Draft County Development Plan prior to the adoption of the County Development Plan.	
<b>Chief Executive's Response</b>	
See response to MH-C5-895 (NOM 4)	
<b>Chief Executive's Recommendation</b>	
No change recommended.	

# Chapter 3

## Settlement and Housing Strategy

<b>Submission No.:</b>	MH-C5-69
<b>Submitted by:</b>	Colm Sommerville
<b>Submission Theme(s):</b>	Chapter 11 Development Management Standards and Land Use Zoning Objectives, Chapter 3 Settlement Strategy, Chapter 4 Economy and Employment Strategy.
<b>Summary of Submissions:</b>	
<p>The purpose of this submission is to seek the rezoning of a circa 2 Ha greenfield site adjacent to “The Belfry” and “Bathe Abbey” along the R150 (Navan Road) Duleek, Co. Meath. The submission requests the following:</p> <ol style="list-style-type: none"> <li>1. That the subject lands are zoned for residential purposes and that the site is included in the settlement boundary for Duleek.</li> <li>2. That the status of Duleek is increased in the Settlement Strategy.</li> <li>3. That Duleek’s position as part of the M1 Economic Corridor is acknowledged and its economic development potential is not limited through policies that have the effect of limiting its potential.</li> </ol>	
<b>Chief Executive’s Response</b>	
<ol style="list-style-type: none"> <li>1. As per the requirements of Section 10 (1A) of the Planning and Development Act 2000, as amended, it is necessary for a Local Authority to prepare a development plan that is consistent with the relevant regional spatial and economic strategy for the region. This includes complying with the population targets that are set out as part of these regional strategies. In this regard, Meath County Council have prepared a strategy that complies with the population targets set out as part of the relevant regional strategy and this is set out in Chapter 2 of the Draft Plan. A household allocation of 336 units is provided for Duleek and, as per Chapter 2, this is sufficient to accommodate the population growth for this settlement over the plan period. As outlined in Chapter 2 of the Draft Plan, it is considered that there are sufficient residential lands zoned in Duleek for the delivery of these units and as such there is no requirement for further lands to be zoned.</li> </ol> <p>It is considered that the lands chosen for residential development in this location are sequentially preferable, are appropriately serviced and preferable to the lands subject to this submission. This approach is consistent with Development Plan Guidelines for Planning Authorities 2009 issued under Section 28 of the Planning and Development Act 2000, as amended as well as the objectives of the National Planning Framework and the Eastern and Midland Regional Assembly.</p> <ol style="list-style-type: none"> <li>2. With regard to the status of Duleek in the Settlement Hierarchy, it is noted that Duleek is included in both the Self-Sustaining Towns category and the Towns and Villages Category in Table 3.4 of Vol. 1 of the Draft Plan. As such, it is necessary to clarify that Duleek should only be included in the “Self-sustaining Towns” category of the Draft Plan as reflected in the response to the OPR submission (MH-C5-816).</li> <li>3. Finally, it is noted that the Economy and Employment Strategy is informed by the Economic Strategy for County Meath 2014-2022. This strategy identified areas of economic growth and potential development for Co. Meath. As such Chapter 4 Economy and Employment Strategy in Vol. 1 of the Draft Plan has identified appropriate higher</li> </ol>	

order centres on which employment growth is identified as per Section 4.7. It is however, noted that Duleek is an important Local Employment Centre for East Meath as part of the Duleek Written Statement Vol. 2 and as such it is not considered necessary to further clarify the economic role of Duleek as part of the Draft Plan.

#### **Chief Executive's Recommendation**

1. No change recommended
2. Please refer to the submission of the OPR (MH-C5-816) for recommendation regarding the status of Duleek
3. No change recommended

<b>Submission No.:</b>	MH-C5-107
<b>Submitted by:</b>	Monica Hurson Kelly
<b>Submission Theme(s):</b>	Chapter 3 Settlement and Housing Strategy, Chapter 5 Movement Strategy, Chapter 6 Infrastructure Strategy, Chapter 7 Community Building Strategy, Chapter 11 Development Management Standards and Land Use Zoning Objectives
<b>Summary of Submissions:</b>	
<ol style="list-style-type: none"> <li>1. Suitable accommodation for those wishing to downsize is required in Dunshaughlin. None of the new developments have facilities to accommodate the elderly or people with wheelchair needs. Bungalows should be included in all planning agreements</li> <li>2. Insufficient public transport is provided for Dunshaughlin and the Navan. There is no plan for a rail connection even though the rail line could be provided along the old rail corridor which still exists. It is also noted that accessing the village from Dublin can take 45-60 mins for the last mile.</li> <li>3. Improved primary and secondary school facilities are welcomed as there are not sufficient secondary school spaces available and the temporary location of the primary school is not ideal for families. There is also a lack of creche facilities.</li> </ol>	
<b>Chief Executive's Response</b>	
<ol style="list-style-type: none"> <li>1. The powers to ensure that buildings are constructed so as to allow for wheelchair access are addressed as part of the national Building Regulations (Part M) and as such is not a matter that can be detailed in the Draft Plan. Meath County Council do support the implementation of universal access as part of the Draft Plan and this is addressed as part of SOC POL 7. In relation to downsizing and accommodation for elderly people, this is addressed as part of Section 3.8.8 of the Draft Plan and the provision of units for those downsizing is noted therein. In relation to those with disabilities who require accommodation this is addressed as part of Section 3.8.8.1 of the Draft Plan. In relation to the provision of bungalows in all developments, it is considered that this is not always possible, however, it is outlined as part of SH POL 7, DM POL 6, DM OBJ 24 and DM OBJ 59 that a mix of units can be provided.</li> <li>2. It should be noted that MOV POL 5 and MOV POL 6 both note the proposal of Meath County Council to work with Irish Rail so as to deliver the extension of the rail line from M3 Parkway to Navan. The Council remains strongly committed to the delivery of the rail to Navan and a strong policy stance is set out in the Draft Plan in support of this as set out in Section 5.7.1 of the Draft Plan.</li> </ol>	

The detailed designed alignment reflects that prepared and advanced by Iarnród Éireann and confirmed by the NTA. The alignment is protected from further development through the R1 Rail Corridor objective and specific zoning objective R1 Rail Corridor which seeks 'to provide for a strategic rail corridor and associated physical infrastructure'.

3. In the cases of schools, both primary and secondary, Meath County Council are not the body that delivers such facilities. As part of the Draft Plan, it is considered that sufficient lands have been identified with G1 zoned lands that have been agreed with the Department of Education. See submission MH-C5-824 for further details. Furthermore, Section 7.7.3.1 of the Draft Plan has outlined the proposed additional schools that will be required. In this regard should any additional facilities be required Meath County Council will be advised by the Department of Education in appropriate locations. In relation to the provision of creche facilities, it is noted that SOC POL 6 addresses this matter as it requires a social infrastructure assessment as part of any new planning application. Should additional childcare facilities be required in a location it will be requested as part of any such application.

#### **Chief Executive's Recommendation**

No change recommended

<b>Submission No.:</b>	MH-C5-293
<b>Submitted by:</b>	Jimmy Brady
<b>Submission Theme(s):</b>	Chapter 3 Settlement and Housing Strategy
<b>Summary of Submissions:</b>	
This submission relates to Clonee and deals with the following matters:	
<ol style="list-style-type: none"> <li>1. It is noted that Clonee has recently been successful in attracting economic investment, however, it is submitted that these needs to be matched by the fast delivery of affordable housing units to address the national housing crisis. It is also submitted that housing will be delivered to address this crisis and Meath should take the economic benefits of same.</li> <li>2. It is submitted that the delivery of housing will occur and that the provision of such units in Meath will provide the economic benefit to Co. Meath.</li> <li>3. It is noted that there are areas of Meath that are designated as rent pressures zones and it is considered that the current CDP policies restrict the potential to deliver additional units in these locations. As such very few housing units have been constructed in these areas during the period of the current CDP. It is considered that that policies and objectives reflective of the need for additional housing, as outlined in Rebuilding Ireland, should be provided in the Draft plan. These should be consistent with the National Planning Framework and the regional planning framework. It is suggested that additional units should be provided in the areas of the rent pressure zone and a table of the Current CDP outlines that a greater number of units are being provided in areas with less pressure than those settlements under pressure.</li> <li>4. Review Phasing rationale to include likelihood of delivery. Many areas within settlements have been designated as Phase 1 Residential, based on extant permissions (at that time), distances to a school, bus stop etc, and the logic of the methodologies set out in Variation 2 of the existing Plan is acknowledged. However, in many cases, it has failed to deliver the units required. Some of the reasons affecting delivery might include, the owner simply does not want to develop, the owner can't develop due to insolvency, banking difficulties, Nama involvement etc., the level of debt attached to the holding means that development is not commercially viable at achievable market rates or the cost of development – topography, infrastructure, ground conditions etc. is too high. It is</li> </ol>	

considered that additional land should be zoned and that landowners should be engaged to determine their willingness to deliver units.

5. The policies relating to Clonee and Dunboyne provided in national and regional policies are outlined in this submission and it is respectfully suggested that consideration is given to extending the development boundary of Clonee to allow for further residential development. This area should be prioritised over other areas due to the proximity of the rail stations.
6. It is submitted that a full review of all policies in relation to the delivery of housing should be undertaken as Meath has the potential to address the need for additional supply in the context of the national housing crisis.
7. It is generally submitted that lands which are located in Phase 1 cannot be delivered and as such revised housing plans and additional zoning should be considered by the Planning Authority. It is considered that the zoning of additional lands would be appropriate with additional population also being allocated within the regional planning framework.

#### **Chief Executive's Response**

1. The noted success of the Meath Economic Development Strategy 2014-2022 is welcomed and that this success is ongoing and will continue to provide important economic benefits to the Dunboyne/Clonee/Pace area. It should be noted that a 20% increase in population has been allocated to Clonee as part of the Draft Plan and it is expected that there are sufficient lands zoned for residential or mixed residential uses to accommodate this development.
2. In relation to the construction industry, the Meath Economic Development Strategy 2014-2022 which is supported by ED POL 2 of the Draft Plan notes the importance of this industry for employment. It is also noted that this industry was devastated by the recession approximately a decade ago and as such, is not a sector that a county wide economic strategy can be focused on.
3. As outlined in this submission the purpose of the rent pressure zone does not necessarily relate to the delivery of units as outlined in the Chapter 2 Core Strategy. In relation to the non-delivery of units, it should be noted that this is not just an issue facing Meath and that this has been a national issue. Meath has, however, seen the construction of a number of housing schemes in the county and as such it is considered that this matter is being addressed. As part of the Draft Plan, it is considered that adequate additional housing has been proposed for the areas noted in this submission and that the quantity of housing proposed generally complies with the requirements of the National Planning Framework, the Eastern Midland Regional Spatial Economic Strategy 2019-2031 and other government policies such as Rebuilding Ireland.
4. As part of the review of this Development Plan, the Draft Plan has outlined locations that are the most sequentially preferable as well as having access to services in line with the principles of the tiered zoning approach. It is considered that the lands zoned in this Draft Plan are most likely to be delivered during the lifetime of the Draft Plan. It is also noted that the approach of the Active Land Management Strategy as noted in Chapter 2 Core Strategy and Chapter 3 Settlement and Housing Strategy. This strategy will help ensure that lands will be released for development during the lifetime of the Draft Plan.
5. It is considered that sufficient lands have been provided for the delivery of housing during the lifetime of the Draft Plan in the Dunboyne/Clonee/Pace area. It is considered that the provision of the population growth and the quantum of lands zoned for Dunboyne/Pace/Clonee is consistent with the policies and objectives of the national and regional planning policies.
6. A review of all policies and objectives relating to housing have been considered during the preparation of the Draft Plan.



7. The Draft Plan outlines lands which can be delivered for housing in Dunboyne/Pace/Clonee, as addressed above. It should be noted that an updated Core Strategy Table 2.11 is included as part of the Chief Executive's report response to the OPR (MH-C5-816) and the growth rate of Dunboyne/Pace/Clonee is addressed as part of this response.

#### **Chief Executive's Recommendation**

1. No change recommended
2. No change recommended
3. No change recommended
4. No change recommended
5. No change recommended
6. No change recommended
7. Please refer to submission MH-C5-816 for proposed changes

<b>Submission No.:</b>	MH-C5-409
<b>Submitted by:</b>	Enfield Development Group
<b>Submission Theme(s):</b>	Chapter 2 – Core Strategy, Chapter 3 - Settlement Strategy, Chapter 11 Development Management Standards and Land Use Zoning Objectives, Enfield Written Statement
<b>Summary of Submission:</b>	
<p>This submission queries the approach to Enfield and notes the following:</p> <ol style="list-style-type: none"> <li>1. Section 3.4.5 Local Area Plans, lists Enfield as one of the areas to have a local area plan. Enfield, however, has not been included in objective, SH OBJ 5. It is submitted that Objective SH OBJ 5 needs to be updated to add Enfield.</li> <li>2. The quantum of units noted as having been committed but not yet built in Enfield Written Statement Section 2.0 Town Context/Character is noted as 135, however, it appears that this does not include TA1771705 which provides an additional 16 units.</li> <li>3. In Enfield Written Statement, Chapter 5.0 Land Use Strategy, Section 5.1 Settlement and Housing it is noted that "the County Development Plan provides a housing allocation of 474 units to Enfield over the 2019 – 2028 period." It is submitted 2028 is a typo, it should read "over the 2019-2026 period "</li> </ol>	
<b>Chief Executive's Response</b>	
<ol style="list-style-type: none"> <li>1. This submission is welcomed and it is noted that Enfield should be included in the list of settlements noted in SH OBJ 5.</li> <li>2. In relation to the number of extant units, it is noted that this figure has been incorporated into the household allocation and as such, any grant of permission or permission that has expired will have to be accounted for when reviewing a planning application. In this regard it should be noted that CS OBJ 3 has been updated as per submission MH-C5-629. Whilst the table produced as part of the Draft Plan will reflect the relevant permissions at the time the Draft Plan was being prepared, a regularly updated version of the table will be utilised by Meath County Council as part of determining decisions on planning applications. In this regard the updated CS OBJ 3 addresses any concerns in relation to this matter.</li> <li>3. This submission is welcomed and the Draft Plan will be prepared to reflect the Draft Plan period.</li> </ol>	

**Chief Executive's Recommendation**

1. Change Recommended Vol. 1 Written Statement, Chapter 3 Settlement and Housing Strategy

**SH OBJ 5**

To prepare new local area Plans for the following settlements within the lifetime of this Plan: Navan, Dunboyne/Dunboyne North/Clonee, Ashbourne, Kells, Trim, Dunshaughlin, Ratoath, **Enfield**, Bettystown-Laytown-Mornington East-Donacarney-Mornington, Oldcastle, Athboy, Duleek, and Stamullen.

2. Please refer to the recommendations outlined in submission MH-C5-629
3. Change Recommended Vol 2 Enfield Written Statement, Chapter 5.0 Land Use Strategy, Section 5.1 Settlement and Housing:  
The Core Strategy (Table 2.11) of the County Development Plan provides a housing allocation of 474 units to Enfield over the ~~2019 – 2028~~ **2020-2027** period.

<b>Submission No.:</b>	MH-C5-428
<b>Submitted by:</b>	Meath Eco Community Group
<b>Submission Theme(s):</b>	Chapter 2 Core Strategy, Chapter 3 Settlement Strategy, Chapter 6 Infrastructure Strategy, Chapter 7 Community Building Strategy, Chapter 9 Rural Development Strategy, Chapter 11 Development Management Strategy and Land Use Zoning Objectives
<b>Summary of Submission:</b>	
<p>This submission includes the following recommendations;</p> <ol style="list-style-type: none"> <li>1. There is an overall focus on increasing housing density and therefore more persons living in contained urban spaces devoid of contact with the natural world. Such design constructs, while efficient to construct, do not give options to residents of Meath to alternative modes of living. In addition, the cost to purchase or rental costs make such types of investments by average middle class house holders brings a huge financial and mental strain on families.</li> </ol> <p>Our group suggests that there is scope in the Meath County Housing strategy for development of ecovillage communities who have intention to live and work the land in a regenerative way. Typically this requires permission to develop on agricultural land for the community to live in such a way though this will ensure that the land is as productive as a traditional farmhold. We would encourage Meath County Council to review the</p> <p>One Planet Development Policy that is in existence in Wales that supports conditional 2 planning permission of ecovillages and households on agricultural land provided that the residents of that land generate 50% of their livelihoods from the land and demonstrate that they are living in a regenerative low impact way. Such a policy has shown that such developments have a higher output from the land than traditional farmholds. Advocating for such a policy in County Meath would make Meath a leader in regenerative living and a model for other counties across Ireland and councils worldwide. It is also recommended that developments of this type be considered outside of the normal scope of housing density, given that residents of an ecovillage intend to live and</p>	

work the land and support biodiversity regeneration. This is not a typical housing development though one we feel, that should be accessible to anyone who wishes to join in the community

2. **Shared Amenities & Community Area:** While referenced in section 7.7 Community Spaces, There is little detail put forward on to integrated living structures or design of living spaces, be it urban or rural, that bring community intentionally in contact with each other. To live together starts off with designing any space or environment to enable this. This includes designing for accessibility for those with reduced mobility, elderly citizens and those with special needs. We believe that design should not separate people of different ages or abilities, but bring them together and most importantly, it should be done with the community as an inclusive participatory process. A stand out success is the Nimble Spaces project in Callan in Kilkenny. While 3 respecting this is a timely process, such design processes have been demonstrated to improve social cohesion and mental health of all who live in such developments. We would like to see this reflected in the plan.
3. **Land Stewardship:** Our community strongly feels that land ownership through traditional freehold model is not sustainable and does not allow for communities to flourish and grow. Our research into eco communities and intentional communities, as well as traditional rural and urban communities is that this model gives too much power to an individual landowner who can undermine the growth of a community by selling land based on their own needs and not the needs of the broader community. The model we are suggesting that gives community agency to build and grow is called Community Land Trust.

Legislation for a community land trust does not exist at present, which limits communities throughout Ireland managing land through a trust that is formed by the eco community and members of the broader community who have an interest in supporting the community. We would encourage Meath County Council to investigate Community Land Trusts as a potential model of land ownership that empowers communities to steward and manage the land over many generations. There is an organisation called Self Organised Architecture ( [www.soa.ie](http://www.soa.ie) ) that are keen to work with local agencies who are committed to exploring creating systems of co-housing, intentional communities and community land trusts. We would encourage Meath County Council to engage with such agencies to advance the urgency for such legislation.

4. **Private Living Spaces:** There has been considerable research and development into buildings using natural materials which can be seen in developments in Cloughjordan and Skreen, Sligo both of which have had local council and planning support. We encourage the county council to expand its investigation into building developments using natural materials.
5. **The Living Land: (a)** We recommend expanding out section 3.8.7.1 or 3.8.9 to include eco villages and communities who have a direct intention to work and live off the land as well as support local industries and businesses to flourish. The relevance of supporting an eco community also supports a considerable amount of objectives in Section 4 on Economic and Employment Strategies in particular ED POL 3 to support live work communities which will have direct impact on reduction of transport requirements as well as transport emissions.

**(b)** To support the transition of many people from urban settings to rural, there needs to be exceptions on the local needs assessment which has the potential to limit development of any eco community if not meeting such assessment. As a community based development, it doesn't fall under individual/family local needs or a traditional housing development. It would be worthwhile for the county council to explore how eco communities can establish in rural areas or villages while maintaining the natural landscape and supporting rural regeneration in small villages or towns.

6. **Water and Waste:** A challenging aspect of any housing development based on permaculture or eco communities is advocacy for the use of compost toilets to collect and manage human waste. Legislation on the requirement of sewage systems is rightly in place for communities who do not wish to manage this function.

For our community, using compost toilet systems to manage human waste and reed bed systems to manage waste water are a key component. We advocate for support of the county council to undertake comprehensive research and investigation into these systems and the best practices for adoption in the right context and to include it as a policy and objective in the Infrastructure Strategy in Section 6 and address these specifically as a climate action.

#### Chief Executive's Response

1. Having reviewed the subject submission, it is noted that no details are provided as to what the proposed density of an Eco Village would be or exactly where these would be provided i.e. on lands zoned A2 New Residential or on lands adjacent to an urban settlement. As such it is not considered appropriate to encourage such an ECO Village based on the information provided as the provision of a low density development in an urban area would be contrary to ministerial guidance, namely sustainable residential development in urban areas guidelines for planning authorities. In the context of providing such a development in the rural areas there is a concern that such a development could be inconsistent with the settlement hierarchy and could lead to a negative impact upon higher tier settlements. As such there is insufficient detail provided as part of this submission to allow for the provision of policies or objectives to support the subject proposal. Meath County Council would however be prepared to investigate further alternative eco housing models where more sustainable methods are utilised and will be open to further discussions with the promoters of such schemes.
2. In relation to community facilities, it should be noted that as part of settlement framework there are lands zoned for community infrastructure or for a mix of uses that can provide community infrastructure. It is outlined that little detail on community facilities is provided, however, it should be noted that the preparation of Local Area Plans is outlined as part of SH OBJ 5 and support is also provided for the development of Village Design Plans by Community groups as part of ED POL 71. Furthermore, the details outlined in Chapter 7 Community Building Strategy is considered to address these matters further. In this regard, it is considered that the provision of community facilities has been accessed sufficiently as part of the draft Plan.
3. As noted in the subject submission, legislation for a community land trust does not exist at present and it would be outside of the remit of Meath County Council to support a manner of land ownership that is not consistent with the legislation of the state. In this regard it is considered that a change to the Draft Plan is not required in this case.
4. The use of different materials for construction raises matter relating to safety and the appropriateness of such materials. The subject submission requests that Meath County Council investigate this further, however, in a legislative context it must be noted that

these matters are addressed as part of building regulations that are separate to planning. In this regard the provision of policies in relation to the use of building materials would be outside of the matters to be addressed in the Draft Plan and if the matter was investigated by Meath County Council it would not be possible to provide policies for objectives to implement any findings. As such it is not considered appropriate to address this matter as part of the Draft Plan.

5. As noted above, the details provided as part of the submission on the Draft Plan are not sufficient to allow Meath County Council to have a full understanding of the proposed model of development and whether it is appropriate in either an urban or rural location. As such it is not considered appropriate to amend any section of the Draft Plan to provide a specific reference to Eco Villages or amend any policies to provide exceptions for the allowance of Eco Villages.
6. The provision of such an approach to waste water solutions has been adopted in other locations and has been accepted by Irish Water. It is considered that the Draft Plan would allow for the provision of compost toilets and reed beds as long as these complied with the requirements of RUR OBJ 29. As noted above it is considered that such a solution would have to comply with the requirement of relevant guidelines, in this case the EPA Guidelines for on-site wastewater treatment systems.

#### **Chief Executive's Recommendation**

No change recommended

<b>Submission No.:</b>	MH-C5-519
<b>Submitted by:</b>	Fiona Heslin
<b>Submission Theme(s):</b>	Chapter 3 – Settlement Strategy
<b>Summary of Submission:</b>	
<p>This submission relates to Kinnegad and requests the following:</p> <ol style="list-style-type: none"> <li>1. It is proposed that the subject-lands' "Lands South of R401" site, be recognised and identified "light industrial park or logistics distribution park or depot" and be considered for zoning for a national transport related utilities use.</li> <li>2. It is proposed that the subject lands as a whole be zoned for as "TU Transport &amp; Utilities: "To provide for essential transport and public utilities and infrastructure including rail stations, park and ride facilities, water and waste water infrastructure, electricity, gas, and telecommunications infrastructure." To facilitate both the use of the lands for "on-line motorway service areas" and/or for "light industrial park or logistics distribution park or depot".</li> <li>3. It is proposed that a locational specific zoning objective or a spot objective be added to the County Development Plan, to indicate the potential future use of a portion of the Subject-lands' Lands North of R401" site as an "on-line motorway service area."</li> </ol>	
<b>Chief Executive's Response</b>	
<p>No part of Kinnegad town is included in the boundary of County Meath as the development of the town has occurred to the north/west of the Kinnegad River which is the boundary between Meath and Westmeath County Council. As such it is not considered appropriate to designate Kinnegad as a settlement in the Draft Plan or to zone the lands sought.</p> <p>Furthermore, the identification of on line motorway locations would have to be agreed with Transport Infrastructure Ireland and as such it is not considered appropriate to provide a spot objective for same or zone the subject lands as requested. It should also be noted that the</p>	

zoning of any land in this location would have to be agreed with Westmeath County council and as such it is not possible to amend the lands in this case.

#### Chief Executive's Recommendation

No change recommended.

<b>Submission No.:</b>	MH-C5-660
<b>Submitted by:</b>	The Planning Partnership
<b>Submission Theme(s):</b>	Chapter 2 – Core Strategy, Chapter 3 - Settlement Strategy, Chapter 11 Development Management Standards and Land Use Zoning Objectives
<b>Summary of Submission:</b>	
<p>This submission queries the approach to the Kinnegad Environs and seeks the following</p> <ol style="list-style-type: none"> <li>1. It is sought that Kinnegad should be designated or at the least recognised, as a town in the County Settlement/Core Strategy, e.g. as a Self-Sustaining Town, similar to the nearby towns of Enfield and Kilcock.</li> <li>2. A new Core Strategy Objective stating the following or similar is sought: <i>"To prepare a Joint Vision and Local Area Plan for Kinnegad in partnership with Westmeath County Council within the lifetime of this Plan"</i>.</li> <li>3. As part of Section 3.4.5 of the Draft Plan is requested that Kinnegad is noted as a settlement for which a non-mandatory local area plan will be prepared.</li> <li>4. It is requested that an objective stating the following is included in the Settlement Strategy <i>"To prepare a Joint Vision and Local Area Plan for Kinnegad in partnership with Westmeath County Council within the lifetime of this Plan"</i>.</li> <li>5. It is sought that a strategic overview of the potential of the Kinnegad environs is included in Section 4.7.4 of the Draft Plan.</li> <li>6. It is requested that a 'Kinnegad Environs Written Statement', is included in Volume 2 of the Draft Plan. It is also requested that zoning and heritage maps are included as part of this requested amendment to Volume 2 of the Draft Plan.</li> <li>7. It is also requested as part of the submission that a 0.43 hectare site in the environs of Kinnegad is identified for housing in line with the above.</li> </ol>	
<b>Chief Executive's Response</b>	
<ol style="list-style-type: none"> <li>1. No part of Kinnegad town is included in the boundary of County Meath as the development of the town has occurred to the north/west of the Kinnegad River which is the boundary between Meath and Westmeath County Council. As such it is not considered appropriate to designate Kinnegad as a settlement in the Draft Plan.</li> <li>2. The preparation of joint plans with other planning authorities has been agreed at a regional level and are included in the EMRA RSES. As the preparation of such a joint plan has not been noted in the EMRA RSES it is not considered appropriate to include the proposed objective.</li> <li>3. As noted above Kinnegad is not considered to be a settlement that is included in County Meath and the inclusion of such a policy could only be done in conjunction with Westmeath County Council. As such this objective will not be included as part of the Draft Plan.</li> <li>4. As noted above this would not be consistent with the EMRA RSES and would have to be agreed with Westmeath County council and the regional authority in advance. As such</li> </ol>	

<p>this objective will not be included as part of the Draft Plan.</p> <ol style="list-style-type: none"> <li>As outlined above it is not considered that the inclusion of such a section would be appropriate at this time.</li> <li>This matter has been addressed in the comments above and whilst not considered appropriate at this time, Meath County Council will continue to engage with Westmeath County Council on matters such as this as well as others.</li> <li>As note above ait is not intended or considered appropriate to zone the subject lands at this time without an agreement at a regional level. As such the subject lands are not to be zoned as part of the Draft Plan.</li> </ol>	
<b>Chief Executive's Recommendation</b>	
<ol style="list-style-type: none"> <li>No change recommended</li> <li>No change recommended</li> <li>No change recommended</li> <li>No change recommended</li> <li>No change recommended</li> <li>No change recommended</li> <li>No change recommended</li> </ol>	

<b>Submission No.:</b>	MH-C5-712
<b>Submitted by:</b>	Land & Heritage Properties Holdings Limited
<b>Submission Theme(s):</b>	Chapter 2 – Core Strategy, Chapter 4 – Economic and Employment Strategy
<b>Summary of Submission:</b>	
<p>This submission queries the approach to Slane and seeks the following</p> <ol style="list-style-type: none"> <li>This submission highlights that Land &amp; Heritage Properties Holdings Limited have invested in Slane including Tankardstown House. It is noted that there have been several planning applications for residential units as well as a nursing home, all of which have been refused in Slane. It is noted that a site at Churchlands is proposed to be dezoned. It is considered that there is a lack of support for development in Slane that has led to a situation where new housing units have not been provided in Slane.</li> <li>It is considered that it is necessary to provide support for local employers through the planning system and that substantial investment is required in the area.</li> </ol>	
<b>Chief Executive's Response</b>	
<ol style="list-style-type: none"> <li>As part of the review of the Draft Plan policies have been provided which address the delivery of housing as well as other developments and the Draft Plan outlines in Vol. 2 Slane Written Statement SLN POL 1, SLN OBJ 1 and SLN OBJ 2 in this regard. The policies and objectives are examples of how Meath County Council are encouraging and facilitating the development of Slane. It is important that any proposed development complies with the proper planning and sustainable development of the area. In this regard, whilst Meath County Council will promote and facilitate development in Slane, it is important that any forthcoming developer addresses the requirements of the relevant development plan, ministerial and other normal planning matters such as traffic safety etc. It is considered that many of the issues raised within the refusals of planning permission have more to do with the content, detail and layouts of proposed schemes and amendments to the schemes can be addressed through compliance with existing policy.</li> <li>As part of the Draft Plan, Meath County Council have included policies such as ED POL 8</li> </ol>	



which seeks to encourage and facilitate local employment opportunities. Furthermore, as part of Vol 2. Slane Written Statement Section 4.2 addresses Economy and Employment (including retail) relating to Slane. The proposals outlined as part of the Draft Plan, as well as the other services available from Meath County Council such as the Local Enterprise Office, provides sufficient support for the economic development of locations such as Slane.

#### Chief Executive's Recommendation

1. No change recommended
2. No change recommended

<b>Submission No.:</b>	MH-C5-769
<b>Submitted by:</b>	Roisin Geraghty
<b>Submission Theme(s):</b>	Chapter 3 Settlement Strategy, Housing Strategy
<b>Summary of Submission:</b>	
This submission outlines that there is an attachment, however, no attachment appears in this submission	
<b>Chief Executive's Response</b>	
No response required	
<b>Chief Executive's Recommendation</b>	
No change required	

<b>Submission No.:</b>	MH-C5-843
<b>Submitted by:</b>	Cllr. Francis Deane
<b>Submission Theme(s):</b>	Chapter 3 Settlement and Housing Strategy, Chapter 6 Infrastructure Strategy
<b>Summary of Submission:</b>	
<ol style="list-style-type: none"> <li>1. This submission notes the provision of SH OBJ 28 as part of the Draft Plan. This submission, however, questions, whether or not this approach goes far enough so as to address the requirement of disability and equality legislation.</li> <li>2. It is also noted that apartments can provide particularly suitable accommodation in towns and villages for those with disabilities as well as the elderly. In this regard it is requested that apartment development is facilitated in towns and villages in County Meath.</li> <li>3. It is also requested that an audit of existing Built Infrastructure is undertaken with regard to access to buildings, roads, footpaths, bus stops, etc. to ensure that these are constructed to ensure access for all.</li> </ol>	
<b>Chief Executive's Response</b>	
<ol style="list-style-type: none"> <li>1. As outlined in SH OBJ 28, it is noted that the requirement for 5% of buildings to provide universal design accords with 'Building for Everyone: A Universal Design' developed by the Centre for Excellence in Universal Design (National Disability Authority). Given that</li> </ol>	

this document was prepared by the National Disability Authority, it is considered appropriate at this time to accord with its recommendations. Requiring a higher percentage of units to comply with these requirements could lead to unnecessarily high construction costs. Furthermore, it should be noted that Housing Strategy will be reviewed as part of the two-year review of the development plan and as such, if national guidance has been updated this will be reflected in a revised housing strategy that can be included in the Development Plan as part of a variation process.

2. It is considered that the objectives of the Draft Plan accommodate the provision of apartments in towns and villages. In smaller settlements it is uncommon to find apartments due to the costs of constructing same, however, the Draft Plan would encourage and facilitate a range of house typologies being provided in towns or villages.
3. Meath County Council have outlined a number of policies in relation to providing access to all including SH POL 6, SH OBJ 19, SOC POL 13, MOV OBJ 13 and DM OBJ 165. In this regard, access for all is an important part of the Draft Plan and it will be implemented through the objectives and policies noted above. In relation to an audit of such facilities, it is considered that there are already appropriate mechanisms with regard to the enforcement of planning applications and as such it is not considered likely that an audit would be practical. Furthermore, were an audit undertaken as suggested, in many cases there would be no mechanism for the Planning Authority to rectify any defects as it is likely that most of the issues would be found with older infrastructure including streets and footpaths that have existed for some time. As such, it is not be proposed to undertake such an audit as part of the Draft Plan, however, further consideration to such issues could be addressed as part of the local area plans that are to be prepared in line with SH OBJ 5.

#### **Chief Executive's Recommendation**

1. No change recommended
2. No change recommended
3. No change recommended

<b>Submission No.:</b>	MH-C5-942
<b>Submitted by:</b>	Meath Housing Disability Steering Group
<b>Submission Theme(s):</b>	Chapter 3 Settlement and Housing Strategy
<b>Summary of Submission:</b>	
<p>This submission relates to the requirements of those with disabilities. It is highlighted that c.11.6% of people in County Meath have some form of disability. It is considered that without the provision of a specific objective relating to providing housing for those with disabilities it will be difficult to source appropriate housing for individuals with disabilities.</p> <p>It is submitted that as part of the Draft Plan a provision should be made for a proportion of all housing units (5% is suggested) to be provided with ground floor bedroom and bathroom facilities. It is also noted that consideration of those with disabilities should be considered when providing a mix of housing types. It is submitted that this will allow for those with disabilities to be able to stay in their communities as finding appropriate housing can be difficult.</p>	
<b>Chief Executive's Response</b>	
The requirements of those with disabilities is an important consideration of national housing	

requirements as it is important that adaptable and appropriate housing solutions are provided for those with disabilities. In relation to Meath County Council's response to this matter, it is noted that policies such as SH OBJ 6 and SH OBJ 19. Furthermore, it is noted that SH OBJ 28 states the following:

*"To seek that all new residential developments on zoned lands in excess of 20 residential units provide for a minimum of 5% universally designed units in accordance with the requirements of the 'Building for Everyone: A Universal Design' developed by the Centre for Excellence in Universal Design (National Disability Authority)."*

In this regard it is considered that SH OBJ 28 addresses the matter that is raised in this case. SH OBJ 17 also notes that the Housing Strategy will be reviewed as part of the two-year review of the development plan and as such, if national guidance has been updated this will be reflected in a revised housing strategy that can be included in the Development Plan as part of a variation process.

<b>Chief Executive's Recommendation</b>
No Change Recommended.

# Chapter 4

## Economic and Employment Strategy

<b>Submission No.:</b>	MH-C5-75
<b>Submitted by:</b>	John Gannon
<b>Submission Theme(s):</b>	Chapter 11 Development Management Standards and Land Use Zoning Objectives, Chapter 4 Economy and Employment Strategy.
<b>Summary of Submissions:</b>	
<p>This submission relates to the development of Data Centres and seeks the inclusion of a policy that would provide the following:</p> <ul style="list-style-type: none"> <li>• “Recognition that lands suitable for the development of Data Centres demand a confluence, or co-location, of required enabling infrastructure (fibre and power requirements, as well as supportive road infrastructure);</li> <li>• Specifically, potential Data Centre location sites should be located within 3km of a transmission (110/220/400 kV) substation or 2 km of an overhead line. In addition, potential development locations should be within 20 km of at least one major backhaul fibre network;</li> <li>• It should be the policy of Meath County Council to support the development of Data Centres, in these locations, subject to the usual criteria of assessment expected for this form of Development, such as an assessment of; <ul style="list-style-type: none"> <li>○ Design, scale, layout;</li> <li>○ Visual impact;</li> <li>○ Noise;</li> <li>○ Flood risk;</li> <li>○ Appropriate Assessment Screening;</li> <li>○ Ecology and environment considerations (including Environmental Impact Assessment) and</li> <li>○ Transport and access arrangements etc.”</li> </ul> </li> </ul>	
<b>Chief Executive’s Response</b>	
<p>As noted in Section 4.8 of the Draft Plan, Meath County Council have worked closely with industry leaders to identify appropriate locations in County Meath for the development of Data Centres and as such, the lands required to accommodate such developments have already been identified in the Draft Plan. It is noted as part of section 4.8 that Meath County Council will <i>“continue to work with industry leaders and stakeholders in the identification of suitable sites for data centre development.”</i></p> <p>It is noted that this submission does not identify a specific site that would be appropriate and seeks the inclusion of a policy. It is considered that the submitted policy is too general and the matters noted above would be considered as part of any planning application for such a development. As such, it is not considered that the proposed policy would be in the best interests of the proper planning and sustainable development of the area and that the policy would not contribute positively to the delivery of Data Centre developments in County Meath. Furthermore, it is noted as part of the Planning and Development (Amendment) Act 2018 that it is intended to include Data Centres of a certain scale as Strategic Infrastructure Development. It is therefore not considered that the above policy is required given that An Bord Pleanála will be determining such policies.</p>	
<b>Chief Executive’s Recommendation</b>	
No Change Recommended	

<b>Submission No.:</b>	MH-C5-205
<b>Submitted by:</b>	Shipton Group
<b>Submission Theme(s):</b>	Chapter 4 – Economic and Employment Strategy, Meath Retail Strategy 2020 - 2026
<b>Summary of Submissions:</b>	
<p>This submission relates to Retail Warehousing and outlines that online retail is having an impact on the viability of retail warehouse units, thus leading to vacancy's in retail parks. It is submitted that the wording of DM OBJ 104 is too restrictive and that the wording should be changed to allow Meath County Council to lift the "bulky goods" restrictions that apply to such developments.</p> <p>A suggested wording is as follows:</p> <p><i>"Any Retail warehousing park / development shall be restricted to "bulky goods" as defined by Annex 1 of the Retail Planning Guidelines (2012) and ancillary products shall not exceed 20% of the total net retail floorspace of the relevant Retail warehousing unit.</i></p> <p><i>On a case by case basis this restriction may be partially lifted where it can be demonstrated that the removal of this restriction will lead to the commercial sustainability of a Retail warehousing park development. Any restriction removal to be limited to 20% of the overall size of the Retail warehouse park / development with no restriction on unit sizes. Permitted uses to include open retail, retail services, offices and local neighbourhood services/facilities."</i></p>	
<b>Chief Executive's Response</b>	
<p>Retail including retail warehousing facilities are an important part of County Meath's economy as well as the national economy. It is noted that retail warehouse parks have developed over the last 20 years and these have become part of the retail landscape. This has been reflected in the Retail Planning Guidelines 2012.</p> <p>The proposed policy would lead to the Draft Plan being inconsistent with the Retail Planning Guidelines 2012 as it would be providing an objective/policy that would conflict with the provisions of the aforementioned document. It should be noted that the purpose of providing a restriction on the types of goods being sold in retail warehouse parks is due to the fact the sale of convenience goods in retail parks can be potentially very damaging to Town Centres and are therefore not permitted in principle. Given the primacy of Town Centres in the retail hierarchy, it would be considered inappropriate to adopt the above proposal as this would have a detrimental impact on Town Centres thus leading to further vacancy in Town Centre. As such, it is considered that the proposed approach to retail parks is not acceptable and would be inconsistent with National retail planning policy.</p>	
<b>Chief Executive's Recommendation</b>	
No Change Recommended	

<b>Submission No.:</b>	MH-C5-272, 453, 556
<b>Submitted by:</b>	MH-C5-272 Navan & District Angling Association MH C5-453 Boyne Catchment Angling Association MH-C5-556 Kells Anglers
<b>Submission Theme(s):</b>	Chapter 4 Economy and Employment Strategy
<b>Summary of Submission:</b>	
<p>These submissions relate to angling and angling tourism and are made by the Navan &amp; District Angling Association, Kells Anglers and the Boyne Catchment Angling Association. It is noted that the Navan and Kells anglers are part of the Boyne Catchment Angling Association.</p> <p>These submissions outline the quality of the fishing along the Boyne and Blackwater rivers, the importance on conservation in the area and potential for angling tourism. With regard to the angling tourism it is noted as part of the Navan &amp; District Angling Association submission that there is a number of foreign visitors who visit Meath for angling tourism.</p> <p>These submissions request the addition of a new policy as follows:</p> <p><i>“ED POL XX – To promote game and coarse angling throughout the Boyne Valley fishery within County Meath to enhance and support angling tourism in addition to protecting and raising awareness of aquatic based species and habitat improvement”</i></p>	
<b>Chief Executive’s Response</b>	
<p>The contents of this submission have been considered and the use of natural features such as the Boyne and Blackwater river is welcomed. The encouragement of leisure facilities and the use of natural features for promoting active tourism is addressed as part of ED POL 42. Having considered the contents of the subject submission, it is considered appropriate to provide an additional policy similar to that requested. It will however be noted that the protection of the river and the surrounding environment will be the priority in the case of the River Boyne and Blackwater. The proposed policy is noted in the Chief Executive Recommendation below.</p>	
<b>Chief Executive’s Recommendation</b>	
<p>Change Recommended – Vol. 1, Chapter 4, Economic and Employment, Section 4.11.1 Rural Enterprise</p> <p><b>ED POL XX</b>  <b>To support sustainable game and coarse angling throughout the Boyne Valley in County Meath in line with normal planning considerations so as to enhance and support angling tourism in addition to protecting and raising awareness of aquatic based species and habitat improvement</b></p>	



<b>Submission No.:</b>	MH-C5-375
<b>Submitted by:</b>	Drogheda Port Company
<b>Submission Theme(s):</b>	Chapter 4 Economy and Employment Strategy
<b>Summary of Submission:</b>	
<p>This submission relates to the Drogheda Port Company and specifically to ongoing operation of the port as well as the potential for growth and relocation.</p> <p>As outlined in the submission, Drogheda port is an important part of the future of Drogheda as well as its status as a regional growth centre. It is noted as part of the Draft Plan that Drogheda port is an important component of the infrastructure of the region as well as being a strategically important port on the east coast. Drogheda port is also an important employer in the area.</p> <p>Drogheda Port is in the process of preparing a masterplan, 'Blueprint 2050' for Drogheda Port. The masterplan has been subject to an issues paper as well as a Strategic Environmental Assessment Scoping Report. It is intended that the masterplan will be published in the coming months. It is also intended that Drogheda port intends to pursue the objective of providing a new deepwater port on the east coast.</p> <p>The importance of port capacity is noted as part of the NPF as well as the importance of the Dublin – Belfast Corridor, particularly the core network of Drogheda-Dundalk-Newry. In relation to the EMRA RSES RPO 4.11 notes that need to prepare a joint Urban Area Plan for Drogheda, RPO 4.12 supports the importance of Drogheda Docklands and port.</p> <p>ED OBJ 15 of the Draft Plan outlines an objective to deliver a Joint Urban Area Plan for Drogheda as noted in RPO 4.11. It is submitted that RPO 12 should be reflected in the Draft Plan. It is noted that the importance of ports are outlined in the National Marine Planning Framework as well as the National Ports Policy. This is further backed up by the National Development Plan.</p> <p>It is noted as part of the Draft Plan, pg. 102, that Meath County Council supports the regional role of Drogheda port. No objective is provided and as such an objective is recommended as follows:</p> <p>It is an objective of Meath County Council to continue to support the ongoing operation and future expansion of Drogheda Port, through the forthcoming Drogheda Port Masterplan 'Blueprint 2050', as an important employment and economic activity for both Meath.</p> <p>It is highlighted in this submission that Drogheda port and their JV partners intend to progress with the provision of a deepwater port on the east coast in Meath. Policies provided in the current CDP have not been carried forward as part of the draft Plan and these have been highlighted as part of this submission. It is requested that a new policy is provided in the Draft Plan as follows:</p> <p>The council will seek the designation of a Strategic Development Zone to facilitate the development of a modern deepwater port and associated landside and hinterland development. The Port which would be of significant economic importance to the County and the Region will be developed in an integrated and planned manner while safeguarding the natural and archaeological heritage of the area and ensuring any port related development proposals are subject to full environmental assessment including Strategic Environmental Assessment, Environmental Impact Assessment and Natura Impact Assessment as required.</p>	

It is outlined as part of the submission that the above policies should be included in the Draft Plan.

#### **Chief Executive's Response**

The importance of Drogheda port is outlined as part of the Draft Plan. Drogheda port is an important source of jobs for the Southern Drogheda Environs as well as the area along the east coast of Meath. The role of ports has been outlined as part of the National Planning Framework, the National Ports Policy, the National Marine Planning Framework, the EMRA RSES and the Draft Plan. The importance of port facilities in Meath is also noted in the Meath Economic Development Strategy 2014-2022, including the potential for a new port in County Meath.

Whilst RPO 4.11 of the EMRA RSES has been included into the Draft Plan, it is noted that there is no policy that specifically addresses RPO 4.12. In this regard it is considered appropriate to adopt a new policy which supports the on-going operation of Drogheda port as well as the potential for a new deepwater port along the east coast. Whilst the preparation of a Masterplan as well as the undertaking of a feasibility report in relation to a new deepwater port will be supported by Meath County Council, it is not considered appropriate to adopt the policies sought in this submission verbatim. An updated wording will be reflected in the Recommendation below.

#### **Chief Executive's Recommendation**

Change Recommended – Vol. 1, Chapter 4, Economic and Employment, Section 4.27:

##### **ED POL XX**

**To support and protect the role of Drogheda Port as a port of regional significance, including facilitating the relocation of Drogheda Port subject to a feasibility study and appropriate coastal zone management, as well as supporting the future development of the Port Access Northern Cross Route (PANCR), in line with RPO 4.12.**

<b>Submission No.:</b>	MH-C5-525
<b>Submitted by:</b>	Ashbourne Visitors Centre Ltd.
<b>Submission Theme(s):</b>	Chapter 4 – Economic and Employment Strategy
<b>Summary of Submissions:</b>	
<p>This submission primarily relates to Tayto Park (Tayto Park Visitors Centre), Kilbrew, Ashbourne, County Meath.</p> <p>This submission proposes amendments to the Draft Plan which support Tayto Park and the ongoing upgrade of the N2, in recognition of the Park's tourism and economic contribution to the County. As part of this submission, it is noted that the tourism industry is very important to the national economy and that Tayto Park has been a particularly successful tourism attraction in Meath over the last number of years. This submission also highlights the importance of new attractions being provided in Tayto Park so as to ensure that the number of visitors at Tayto Park remain consistent or increase.</p> <p>The proposed amendments include the following:</p> <p>It is proposed by the submission author to amend policy ED POL 52 by removing the words "subject to the provision or upgrade of the requisite physical infrastructure." And replacing this with "Consistent with international experience and best practice, the Council acknowledges the need for Tayto Park to refresh its offer annually, to introduce major new attractions on a 3 to 4 year cycle, and to expand its offer to extend the operating season and retain and grow its workforce. The Council will support the ongoing operation, upgrade, extension and expansion of the offer, including year-round facilities that may include a hotel and complementary and ancillary uses and events that are appropriately integrated with the established facilities. The Council will also proactively engage with all relevant stakeholders to ensure that supporting physical infrastructure is in place to accommodate the ongoing operation and expansion of the Park, including water, wastewater and enhanced access to the commenced upgrade of the N2 from the Rath Roundabout to Kilmoon Cross."</p> <p>As part of Section 5.8.3 it is requested that as part of the submission text changes would be made to include the following text in the middle of this section "...that will include significantly increased capacity at Kilmoon cross to accommodate the ongoing operation and expansion of Tayto Park,..."</p> <p>The final proposed amendment seeks the adding of text at the end of MOV OBJ 35 which would be as follows, "...including the delivery of the Slane Bypass and significantly increased capacity at the Kilmoon Cross to accommodate the ongoing operation and expansion of Tayto Park."</p>	
<b>Chief Executive's Response</b>	
<p>It is recognized that Tayto Park is an important tourism attraction in County Meath and Meath County Council have supported the development of this attraction over the years which is reflected in policies such as ED POL 52. The provision of such a policy where a business is specifically named highlights the importance of this regional and national attraction and is recognition of support from Meath County Council for the ongoing development at this location.</p> <p>As part of the Chapter 4, Economic and Employment Chapter, Tourism is highlighted as an area of potential growth as noted in the Meath Economic Strategy 2014-2022. Whilst there is a downturn in tourism at this time due to Covid-19, it is considered that the measures in the Draft Plan will</p>	

assist in the restoration of tourism numbers once all of the Covid-19 measures are lifted.

With regard to the policies that have been specifically noted for amendment, it is considered that these must be considered in relation to the role of a development plan in its entirety as well as ensuring that the policies do not prejudice normal planning procedures.

Each of the proposed changes outlined above will now be addressed in turn,

1. **ED POL 52** : In relation to the proposed change to Policy ED POL 52 it is noted that Meath County Council do support the improvement of Tayto Park, however, it would be inappropriate as part of the Draft Plan for a Local Authority to specifically support a form of development without having considered the potential infrastructural, environmental and other potential impacts of the proposed development.
2. **Section 5.8.3:** It is requested that additional text is submitted in relation to the proposed development of the N2 Rath roundabout – Kilmoon Cross. Whilst the proposed project is an important part of addressing traffic capacity and safety in the area, the project will benefit more than just Tayto Park. The inclusion of this text change as part of the Draft Plan could lead to a view that the project is only proposed to facilitate Tayto Park and could potentially lead to additional development contributions being applied to any permissions granted in Tayto Park. To avoid such an outcome, it is considered that the inclusion of the proposed text in relation to a national project that has been identified in the National Development Plan would be inappropriate.
3. **MOV OBJ 35:** As per the response to the request for additional text in relation to Section 5.8.3, it is not considered appropriate to include the proposed text as part of this objective as there are a number of locations that will benefit from this proposed road development. Furthermore, the N2 is a national primary route and due to its strategic nature a project such as this could not be noted as being developed for a single location such as Tayto Park.

#### Chief Executive's Recommendation

1. No Change Recommended
2. No Change Recommended
3. No Change Recommended

<b>Submission No.:</b>	MH-C5-631
<b>Submitted by:</b>	Love Drogheda BID CLG
<b>Submission Theme(s):</b>	Chapter 2 Core Strategy, Chapter 3 Settlement Strategy, Chapter 4 Economy and Employment Strategy, Chapter 11 Development Management Standards and Land Use Zoning Objectives
<b>Summary of Submission:</b>	
<p>This submission relates to a number of matters relating to Drogheda and the submission seeks the following:</p> <ol style="list-style-type: none"> <li>1. A specific timeline to be outlined for the development of a new Joint Urban Area Plan as per Section 2.8.1.1 of the Draft Plan, taking note that the existing Southern Environs of Drogheda LAP is from 2009 with vastly different economic and social circumstances, preferably by December 2020.</li> <li>2. Amendment of the wording in SH OBJ7 to take note of the urgency required in preparing a cross boundary Joint Urban Plan.</li> <li>3. Delivery of a cross boundary Retail Strategy for Drogheda focused on retaining a strong and sustainable urban core via promotion of brownfield regeneration, infill development and reducing the opportunity for out of town centre developments.</li> <li>4. Enhanced marketing and promotion of the recreational activities associated with Blue Flag Beaches.</li> <li>5. Enhanced planning of recreational use and amenity support of the River Boyne as a major draw for slow tourism and support for basing the Boyne Valley Tourism officer in Drogheda.</li> <li>6. Continued support for Greenway Development along the Boyne to assist in Slow Tourism linking with historical sites.</li> <li>7. We are asking that Meath Co. Co., take note of the targeted growth in Drogheda South (projected 3,300 by 2026) and surrounding Laytown, Bettystown and Mornington area (1,500) and provide adequate community, amenity and service provision in accordance with any new residential development.</li> <li>8. Support for the development and zoning of appropriate employment land in South Drogheda and co-working space to aid in the reduction of commuters should be prioritised with respect to the fast changing employment dynamics with respect to the fact that the two lowest levels of local jobs provision are Laytown-Mornington 0.16% and South Drogheda 0.32% Fig3.3. and Fig3.4 of the draft plan.</li> <li>9. Encourage planned growth in South Drogheda as an employment centre and attract a net inflow of workers in accordance with designation as a regional growth centre by zoning appropriate amounts of employment land taking account of the current IDA site being secured by AWS. We request that further lands are identified and zoned appropriately for the growth of indigenous companies and potential FDI.</li> <li>10. Supportive of the SOC OBJ 12 and the development of town park of scale for Drogheda South.</li> </ol>	
<b>Chief Executive's Response</b>	
<ol style="list-style-type: none"> <li>1. As noted in response to MH-C5-816, it is not possible to provide a timeline for the preparation of this Joint Urban Area Plan due to the fact that this joint plan will involve two county councils working together. Furthermore, both county councils are preparing</li> </ol>	

development plans at this time and as such these will take priority due to the statutory timelines outlined in the Planning and Development Act 2000-2020. Meath County Council do however commit fully to developing this joint urban plan and shall prioritise it as part of the Local Area Plan programme.

2. As noted in the response to MH-C5-816, it is considered appropriate to note the preparation of this plan as a priority, however, the preparation of this plan should not delay the preparation of other Local Area Plans outlined in the Draft Plan.
3. It should be noted that an updated Meath Retail Strategy has been included as part of the Draft Plan. Given the preparation of a joint retail strategy would require the agreement of Louth County Council, it is not considered appropriate to provide an objective to this effect at this time. It is considered that the preparation of such a document could be discussed and considered as part of the Joint Urban Area Plan.
4. It is noted that the maintenance as well as promotion of beaches to Blue Flag status is outlined as part of HER OBJ 40. Furthermore, it is noted as part of Section 7.7.6 of the Draft Plan that beaches are an important part of the tourism offer and it is considered that those policies and objectives are sufficient to address the issues.
5. It is considered that additional support could be provided in relation to the sustainable tourism use of the River Boyne. In this regard, it is recommended that ED OBJ 22 is amended to include specific reference to the River Boyne.
6. It is considered that sufficient support is provided throughout the plan for the continued use or development of greenways and this is particularly highlighted in ED POL 57 and ED OBJ 75.
7. It is considered that the provision of the appropriate development management standards in Chapter 11 of the Draft Plan has addressed this concern. This matter will also be looked at in more detail as part of the preparation of the relevant Local Area Plans / joint urban plan for these settlements. As such it is not considered necessary to alter the Draft Plan in relation to this matter.
8. Whilst the employment ratios outlined for South Drogheda and Laytown-Mornington seem particularly low, it should be noted that those who work in central Drogheda, i.e. in Louth, are not included in this figure due to the fact they do not work in County Meath. Attracting additional employment to Southern Drogheda is important and it should be noted that further economic generating uses has been recently granted in the area (Planning Reg. Ref. No. LB191735) and there are c.146 hectares of employment land zoned in Southern Drogheda. It is considered that there are sufficient employment lands in this location and as such there is no need to designate further employment lands. Finally, it is noted that ED OBJ 19 promotes the development of Southern Drogheda as an employment hub. Given the above, it is not considered necessary to amend the Draft Plan in this regard.
9. As noted above there are c146 hectares of land zoned in Southern Drogheda for employment uses as well as there being c5 hectares of land zoned for mixed use purposes. As such, it is considered that there are sufficient lands zoned as part of the Draft Plan.
10. This point is welcomed and we hope to work with the Love Drogheda BID team in delivering such a park during the lifetime of the Draft Plan.

#### **Chief Executive's Recommendation**

1. No Change Recommended
2. No Change Recommended
3. No Change Recommended

4. No Change Recommended

5. Change Recommended: Vol 1, Chapter 4, Economy and Employment Chapter, Section 4.7.2.2 Regional Growth Centre – Drogheda, ED OBJ 22:

ED POL 22

To seek to maximise the tourism potential of the significant tourism hub within the Boyne Valley region which includes the UNESCO World Heritage Site of Brú na Bóinne, the Battle of the Boyne Site at Oldbridge, **the Boyne River** and the coastal area of East Meath stretching from Mornington to Gormonston whilst ensuring the environmental protection of sensitive and protected coastal habitats and landscape.

6. No Change Recommended

7. No Change Recommended

8. No Change Recommended

9. No Change Recommended

10. No Change Recommended



<b>Submission No.:</b>	MH-C5-746 (Please disregard 724-attachment uploaded in error.)
<b>Submitted by:</b>	Fáilte Ireland
<b>Submission Theme(s):</b>	Chapter 2 Core Strategy, Chapter 4 Economic and Employment Strategy, Chapter 8 Cultural and Natural Heritage Strategy, Chapter 9 Rural Development Strategy, Chapter 10 Climate Change Strategy
<b>Summary of Submission:</b>	
<p>There are a number of matters raised as part of the Fáilte Ireland submission and these are addressed below in turn:</p> <ol style="list-style-type: none"> <li>1. The importance of tourism is noted as part of the Development Plan and a number of policies are highlighted that support tourism. These are welcomed as part of this submission. It is also noted that Fáilte Ireland have developed a Methodology for Tourism Appraisal of Development Plans in the preparation of Development Plans and that this is included in Appendix A of the submission.</li> <li>2. It is considered that the strategic vision of the Draft Plan should be amended to include the following: <ul style="list-style-type: none"> <li>• “To improve the quality of life of all citizens in Meath by creating an environment that supports a vibrant growing economy and a well-connected place to live, learn, <b>visit</b> and do business”</li> </ul> </li> <li>3. It is requested that an additional objective is included in the Core Strategy that relates to strengthening rural economy and enhancing amenity and heritage which would in turn further safeguard tourism asset. It is considered that this would be consistent with the National Planning Framework and Regional Spatial Economic Strategy.</li> <li>4. It is noted that Section 4.11.1, Rural Enterprise includes a section on tourism. It is, however, requested that ED POL 19 be strengthen as follows: <ul style="list-style-type: none"> <li>• “To support and facilitate sustainable agriculture, agri-food, <b>tourism</b>, horticulture, forestry, renewable energy and other rural enterprises at suitable locations in the County”</li> </ul> </li> <li>5. It is also requested that additional text is added to Section 4.26 as it is considered necessary to strengthen destination towns: <ul style="list-style-type: none"> <li>• <b>Fáilte Ireland has started work on the ‘Ancient’ Visitor Experience Development Plan (AVEDP) which aims to develop world-class experiences focused on the region’s rich ancient heritage. This destination development plan will be implemented over the next five years and will be based primarily around Brú na Bóinne and the greater Boyne Valley areas. It is designed to be a roadmap for enhancing the existing Ancient visitor proposition to achieve the objectives of addressing seasonality, increasing visitor numbers, improving dwell time and visitor dispersion across the destination. The plan will provide a destination wide tourism development focus, harnessing existing plans and examining new projects to create a world class destination, using Ancient as the core theme. The AVEDP seeks to capture these projects within one plan and maximise their potential over the next five years. In the development of the AVEDP, the associated objectives reflect the contribution of this plan to achieving the of goals of ‘People, Place and Policy: Growing Tourism to 2025’ that include growing visitor numbers, overseas revenue and employment. In achieving</b></li> </ul> </li> </ol>	

these, the plan also addresses the challenges of seasonality, regional dispersion of visitors and sustainability. Recent multi-million-euro investment into the destination by Fáilte Ireland has already mobilised projects with the potential to be transformative. Examining the broader opportunity around the Brú na Bóinne visitor experience in a UNESCO World Heritage Site has been a central focus. However, the AVEDP has identified an additional range of emerging opportunities with the ability to deliver some of the most experiential Ancient experiences in the world.

- Proposed New Policy wording: **To co-operate with Fáilte Ireland and all relevant stakeholders in the implementation of the Ancient Visitor Experience Development Plan.**
6. Section 4.28.2 is welcomed as it relates to festivals and events. It is noted that the inaugural Púca has taken place and as such the wording of Section 4.28.2 Page 137 should be changed to **‘was held in 2019 with a total number of 19,546 attendees across the 3 days’**.
  7. The submission also requests a change to the wording of Policy ED POL 50 and Objective ED OBJ 74
    - **‘To support and promote existing and new festivals and sporting events.....’**
  8. The inclusion of Section 4.28.5 is welcomed; however, it is requested that the Fáilte Ireland figures are updated as follows:
    - **‘In 2018, 28% or 2.6 million overseas holiday makers to Ireland engaged in some type of walking, the highest engagement in any type of outdoor activity while 5% or 504,000 overseas holidaymakers engaged in cycling.’**
  9. Fáilte Ireland is pleased to see that the important role of towns and villages as tourism centres is highlighted in Section 4.30. It is, however, requested that the wording of ED POL 71 is strengthened with the inclusion of the following:
    - **‘To facilitate and support in the implementation of Town and Village Design Plans and other community led projects to enhance both the town and village environments along with the visitor experience that have been prepared through a public consultation process whilst ensuring that such Plans are consistent with adopted Local Area Plans for such centres and town/village development objectives contained in the County Development Plan.’**
  10. Section 8.6.1 relates specifically to the UNESCO World Heritage Site - Brú na Bóinne. Fáilte Ireland request the inclusion of an objective which relates to the safeguarding of the Brú na Bóinne as a sustainable tourism asset.
  11. It is considered that as part of Map 8.6 there is an opportunity to outline key asset including tourism assets as part of the map identifying protected views.
  12. It is considered that undertaking a local authority renewable energy strategy would ensure an appropriate interaction between both the energy and tourism potential of the county. Whilst the Climate Change strategy, the landscape character assessment and the Wind Energy Guidelines provide so information it is requested that a map-based wind energy strategy which identifies areas suitable and unsuitable for the siting of wind energy development is included
  13. It is also requested that a comprehensive tourism map is included in the written statement ideally within Section 4.24

#### Chief Executive’s Response

1. The comments in relation to the integration of tourism into the plan is welcome. Having reviewed the submission it is noted that no appendix is attached, however, given the

work undertaken in the Meath Economic Development Strategy 2014-2022, it is considered that an appropriate approach has been taken to tourism as part of the preparation of the Draft Plan.

2. It is considered that the strategic vision is acceptable as outlined in the Draft Plan. The purpose of the strategic vision is to outline a high level purpose of the Draft Plan and that tourism is adequately covered in this statement in the comments on supporting the economy and making Meath a well-connected place to do business.
3. It is considered that CS OBJ 6 and CS OBJ 14 address the matters raised in the Fáilte Ireland submission and as such it is not considered necessary to provide an additional objective/policy.
4. In relation to ED POL 19 it is considered that tourism is accounted for in this policy in terms of referring to "other rural enterprises at suitable locations". With policies such as these it is not possible to account for all industries and it is not considered necessary to amend a high level policy in this regard.
5. It is considered appropriate that new body text be included in Section 4.26 which refers to the preparation of Ancient "Visitor Experience Development Plan (AVEDP). Meath County Council welcome the preparation of such plans and similar objectives are included in the Draft Plan such as HER OBJ 12 and ED OBJ 22. Meath County Council have been working with Fáilte Ireland on the preparation of this document, however, the document was not provided as part of the submission and it is not publicly available at the time of the preparation of the CE Report. As noted above the preparation interpretive plans/policies prepared by Fáilte Ireland is welcomed and Meath County Council will continue to work closely with Fáilte Ireland on implementing the policies and objectives relating to Brú na Boinne. The body text will be included in the section as outlined.

At this time, however, it is considered inappropriate to include the requested policy due to a copy of the plan not being submitted as part of the submissions on the Draft Plan and the requirement for public plans and programmes to be subject to SEA and AA. A policy in relation to the AVEDP for this location could be included in a local area plan that is to be prepared in relation to CS OBJ 9 and/or could be included in a variation to the county development plan in the future.

6. This is agreed and the relevant textual change is included in the CE Recommendation.
7. This is agreed and the relevant textual change is included in the CE Recommendation.
8. This is agreed and the relevant textual change is included in the CE Recommendation.
9. The purpose of ED POL 71 does not solely relate to tourism purposes and as such it is considered that this policy should not be amended in line with this submission as to do so could suggest that Meath County Council will only engage with tourism focused plans. Whilst tourism is an important part of the economy of the county, as outlined in the Draft Plan, it would be inappropriate for ED POL 71 to be changed as suggested.
10. Given HER POL 6, 7, 8 11 and HER OBJ 7, 8, 9 all relate to matters such as those raised by Fáilte Ireland, it is not considered necessary to include a further objective/policy in the Draft Plan. Furthermore, ED OBJ 22 and ED POL 56 are substantially similar to that sought in this case and as such it is not considered that further changes are required to the Draft Plan.
11. It is considered that purpose of Map 8.6 is solely to identify locations that have protected views so that this may be considered for protection as part of the development management process. In this regard, it is not considered necessary to add the assets, including tourism assets, to this map as to do so could result in the map being cluttered and being difficult to read/understand.
12. As part of the Draft Plan, INF OBJ 47 notes that the preparation of a Renewable Energy Strategy will be investigated. This policy will remain as part of the Draft Plan and it is not

possible to prepare such a strategy during the time that is provide under legislation for the preparation of the Chief Executive report.

13. In relation to this matter, whilst it is once again noted that tourism is an important part of the economy in Meath, it is not practical to include a map of all relevant economic locations on a sectoral basis. As such it is not considered appropriate to include a map for tourism only in the Draft Plan.

#### Chief Executive's Recommendation

1. No change required.
2. No change recommended.
3. No change required.
4. No change required.
5. It is recommended to include the following text into Section 4.26 as follows:
  - **Fáilte Ireland has started work on the 'Ancient' Visitor Experience Development Plan (AVEDP) which aims to develop world-class experiences focused on the region's rich ancient heritage. This destination development plan will be implemented over the next five years and will be based primarily around Brú na Bóinne and the greater Boyne Valley areas. It is designed to be a roadmap for enhancing the existing Ancient visitor proposition to achieve the objectives of addressing seasonality, increasing visitor numbers, improving dwell time and visitor dispersion across the destination. The plan will provide a destination wide tourism development focus, harnessing existing plans and examining new projects to create a world class destination, using Ancient as the core theme. The AVEDP seeks to capture these projects within one plan and maximise their potential over the next five years. In the development of the AVEDP, the associated objectives reflect the contribution of this plan to achieving the of goals of 'People, Place and Policy: Growing Tourism to 2025' that include growing visitor numbers, overseas revenue and employment. In achieving these, the plan also addresses the challenges of seasonality, regional dispersion of visitors and sustainability. Recent multi-million-euro investment into the destination by Fáilte Ireland has already mobilised projects with the potential to be transformative. Examining the broader opportunity around the Brú na Bóinne visitor experience in a UNESCO World Heritage Site has been a central focus. However, the AVEDP has identified an additional range of emerging opportunities with the ability to deliver some of the most experiential Ancient experiences in the world.**
6. Change recommended Vol. 1 Written statement, Chapter 4, Section 4.28.2:
 

**'to be held in 2019 was held in 2019 with a total number of 19,546 attendees across the 3 days'**
7. Change recommended Vol. 1 Written statement, Chapter 4, ED POL 50 and ED OBJ 74:
 

**"To support and promote existing and new festivals and sporting events....."**
8. Change recommended Vol 1. Chapter 4, Section 4.28.5
 

**"In 2018, 28% or 2.6million overseas holidaymakers to Ireland engaged in some type of walking, the highest engagement in any type of outdoor activity while 5% or 504,000 overseas holidaymakers engaged in cycling."**

9. No change recommended.
10. No change required.
11. No change recommended.
12. No change recommended.
13. No change recommended.

<b>Submission No.:</b>	MH-C5-856
<b>Submitted by:</b>	Cllr Sharon Keogan and Amanda Smith
<b>Submission Theme(s):</b>	Chapter 4 – Economic and Employment Strategy
<b>Summary of Submissions:</b>	
That Meath County Council adopt a resolution to support our proposal to include a Social Enterprise and Innovation Programme into our Economy and Employment Strategy, with core objectives to achieve social, societal; and environmental impact.	
<b>Chief Executive's Response</b>	
It is not clear which programme is being referred to in this case and as no details in relation to the Social Enterprise and Innovation Programme have been provided it is not considered appropriate to amend the Draft Plan	
<b>Chief Executive's Recommendation</b>	
No Change Recommended	

<b>Submission No.:</b>	MH-C5-880
<b>Submitted by:</b>	Stephen Little and Associates on behalf of Sasula UC
<b>Submission Theme(s):</b>	Chapter 4 Economic Strategy
<b>Summary of Submission:</b>	
<p>This submission relates to the development of Killeen Castle and demesne. As part of the submission, it is noted that there has been extensive investment in this development and that the premises has developed to be an exemplar project. In this regard the Jack Nicholas designed 18 hole golf course, the landscaping as well as the restoration works undertaken to date have all been noted. It is submitted that well over €100million euros has been invested in the subject property and that there is more work to be done. In this regard it is considered that the Draft Plan does not provide sufficient support for the completion of this project and that such support had been outlined as part of previous plans. As such there is a concern that without the level of support that has been provided to date that the vision for Killeen Castle and demesne may not be realised.</p> <p>In this regard it is requested that an amendment to the plan is made so as to include a new policy at the end of Section 4.28.3 or 4.28.4:</p> <p>“To promote the on-going realisation and fulfilment of the permitted and substantially implemented vision for the historic demesne at Killeen Castle estate as a high quality integrated tourism product of national significance bearing in mind the unique historic, cultural and architectural importance of the lands and its success to-date in hosting international sporting events and its further potential as an integrated tourism destination centred on a premium standard hotel.”</p>	
<b>Chief Executive's Response</b>	
<p>The development and investment in Killeen Castle over the last 10 years has been an important part of ensuring that this historic structure could be developed and further utilised and is supported by Meath County Council in improving the tourism offer that is available in the County Meath.</p> <p>It is recognised that the proposed development includes an international quality golf course and due to its location adjacent to Dunshaughlin as well as Dublin, has the potential to be a significant tourism attraction in County Meath. This has been identified in the Current CDP as well as previous plans. It is not considered appropriate or possible to mention every development or attraction as part of a development plan simply due to the scale of County Meath and the number of historic features/attractions that exist. It is, however, noted the Killeen Castle and grounds has the potential to be an exemplar development in relation to transforming historic structures and their demesne. As such, the wording outlined as part of the submission is not considered appropriate for individual cases. The Local Authority fully supports the redevelopment of Killeen Castle as a hotel and look forward to engaging with the owners / developers on new development proposals for the historic structure.</p>	
<b>Chief Executive's Recommendation</b>	
No Change recommended	



<b>Submission No.:</b>	MH-C5-1009
<b>Submitted by:</b>	Caulfield Country Boards
<b>Submission Theme(s):</b>	Chapter 4 Economy and Employment Strategy
<b>Summary of Submission:</b>	
<p>This submission raises concern with the potential negative impact the forthcoming CDP will have on small rural business. The submission considers that if resources are being used in the zoned areas, then there is little hope for small business to ever avail of high-speed broadband. The submission also considers that the development plan will push a wedge between rural and urban businesses.</p> <p>Furthermore, the submission considers that the plan will hinder rural businesses by allocating funds to maintain and improve general infrastructure and community outside of the proposed areas. Lack of support and opportunity will eventually see the decrease and the eventual disappearance of small business from rural areas.</p>	
<b>Chief Executive's Response</b>	
<p>The Local Authority agrees and accepts that there is a need to develop a rural economy that offers viable and sustainable employment that offers viable and sustainable employment for existing communities. There is also a need to strengthen the provision / retention of services, regenerate rural communities and promote the economic development of rural areas.</p> <p>It is the policy of the Council to support the location of one off medium to large scale rural enterprise if it is demonstrated, to the satisfaction of the council, that the enterprise can be more readily accommodated in a rural setting than provided in a designated settlement centre and subject to standard development management considerations being applied.</p> <p>The Governments Action Plan for Rural Development "Realising our Rural Potential" highlights the potential activity tourism to contribute to economic growth in rural areas. It is recommended, that the applicant refer to MH-C5-1016 which provides for an additional economic policy for the rural area.</p>	
<b>Chief Executive's Recommendation</b>	
No change recommended.	

<b>Submission No.:</b>	MH-C5-1016
<b>Submitted by:</b>	Hibernia Steel Products Ltd
<b>Submission Theme(s):</b>	Chapter 4 Economy and Employment Strategy
<b>Summary of Submission:</b>	
<p>This submission relates to Hibernia Steel Products Limited. The company undertakes steel import, sales, storage and distribution at its location near Slane, County Meath. The site is located in the rural area and is not subject to a specific land use zoning. It is noted that a number of planning permissions have been recently granted, with some of these having been fully constructed at the time of writing. In this regard it is noted that the subject premises is an important part of the local economy.</p> <p>It is submitted as part of the Draft Plan that there is a lack of support for enterprises in the rural area. It is specifically noted that as part of the Current CDP there is a policy ED POL 20 which supports the expansion of industry or business enterprises. It is outlined that the policies provided as part of the Draft Plan do not address the needs of existing industry/businesses and as such the Draft Plan should be amended. Whilst similar policies/objectives are provided they do not provide the level of support that is needed for existing industry or business enterprises.</p> <p>It is requested that a new policy should be provided as part of the Draft Plan. This should be stated as follows:</p> <p>“Meath County Council will normally permit development proposals for the expansion of existing authorised industrial or business enterprises in the countryside where the resultant development does not negatively impact on the character and amenity of the surrounding area. In all instances, it should be demonstrated that the proposal would not generate traffic of a type and amount inappropriate for the standard of access roads.”</p>	
<b>Chief Executive’s Response</b>	
<p>This submission is welcomed as Meath County Council support the growth of existing business across Meath, particularly in rural areas where the Draft Plan wishes to develop live-work communities as noted in several chapters of the Draft Plan. Businesses such as Hibernia Steel Products Limited are important to realising the delivery of live-work communities as well as the Meath Economic Strategy 2014-2022.</p> <p>In this regard, it is acknowledged that the policies and objectives outlined in Chapter 4 of the Draft Plan do not address the matters raised in ED POL 20 of the Current CDP. As such it is considered appropriate to include a new policy in the Draft Plan as per the submission. The proposed text for additional text and policy is outlined below.</p>	
<b>Chief Executive’s Recommendation</b>	
<p>Change Recommended – Vol. 1, Chapter 4, Economic and Employment, Section 4.11.1:</p> <p><b>ED POL XX</b></p> <p><b>Meath County Council shall positively consider and assess development proposals for the expansion of existing authorised industrial or business enterprises in the countryside where the resultant development does not negatively impact on the character and amenity of the surrounding area. In all instances, it should be demonstrated that the proposal would not generate traffic of a type and amount inappropriate for the standard of the access roads. This policy shall not apply to the National Road Network.</b></p>	

# Chapter 5

## Movement Strategy

<b>Submission No.:</b>	MH-C5-4
<b>Submitted by:</b>	Damien O'Reilly
<b>Submission Theme(s):</b>	Chapter 5 Movement Strategy
<b>Summary of Submission:</b>	
<p>This submission suggests the introduction of a new objective as follows:</p> <p>'In conjunction with Fingal County Council and TII, a joint feasibility study and analysis to be undertaken for a new link road from the M2 Motorway to Dublin Airport. This proposed link road would open county Meath up to the economic benefits of Ireland's main international airport.'</p>	
<b>Chief Executive's Response</b>	
<p>This point was raised as a Notice of Motion and was considered at this stage. As with our previous finding, the NPF notes that the continued strengthening of the economic relationship between Dublin and Belfast can help reinforce the competitiveness of the Eastern and Midlands Region, while also assisting to mitigate the adverse effects of Brexit. As an island, continued investment in Ireland's port and airport connections within the State and to the UK, the EU and the rest of the world, remains integral to underpinning international competitiveness. The changes arising from the onset of Covid 19 does not dilute the long-term need for strong internal connections nor reduce the requirement for ongoing investment as such links are also central to responding to the challenges as well as the opportunities arising from Brexit. This is relevant to the N2 and the Rath to Kilmoon Cross section in particular, given that it is part of a key artery to both the international gateway at Dublin Airport and Dublin Port.</p> <p>The exploration of all options for improved access to the National Airport within County Meath would be of interest to the Council. A link road from the M2 Motorway to Dublin Airport is not specifically provided for in the National Development Plan. Therefore, it would be premature at this time to include such an objective. However, the Council will continue to monitor the need for improvements to our road infrastructure throughout the County and will liaise with TII on an ongoing basis.</p>	
<b>Chief Executive's Recommendation</b>	
No change recommended.	

<b>Submission No.:</b>	MH-C5-22
<b>Submitted by:</b>	Mark Healy
<b>Submission Theme(s):</b>	Chapter 5 Movement Strategy
<b>Summary of Submission:</b>	
<ol style="list-style-type: none"> <li>1. This submission disagrees in part with MOV OBJ 3 of the Draft Plan which proposes to explore the feasibility of a future rail spur off the Navan-Dublin Rail line from Dunshaughlin to serve Ashbourne and Ratoath as it would incur extra cost and restrictions to the Operator. The current designated alignment of Navan-Dublin line is no longer appropriate given that its routes to the west of all population in Ashbourne, Ratoath and Dunshaughlin and a new route should be designed after parkway which will serve all the relevant population centres.</li> </ol>	

2. A new objective is suggested as follows: 'To explore in conjunction with Irish Rail and other stakeholders the feasibility of an alternative route from M3 Parkway to Navan which would serve Ashbourne, Ratoath, and Dunshaughlin.'

#### Chief Executive's Response

1. The current designated alignment of Navan-Dublin line reflects what has been prepared and advanced by Iarnrod Eireann and confirmed by the NTA. It is the responsibility of the Council to protect these lands from further development through the R1 Rail Corridor objective and specific zoning objective R1 Rail Corridor which seeks 'to provide for a strategic rail corridor and associated physical infrastructure'. The re-evaluation of the proposed route would be contrary to national and regional transport policy and is not within the remit of Meath County Council.
2. Please refer to OPR submission recommendation to Observation 8 for response.

#### Chief Executive's Recommendation

No Change recommended

<b>Submission No.:</b>	MH-C5-26 MH-C5-29
<b>Submitted by:</b>	Aisling Rogers St. Josephs National School Mulhussey
<b>Submission Theme(s):</b>	Chapter 5 Movement Strategy
<b>Summary of Submission:</b>	
<p>This submission has been made by the Principal of St. Josephs NS Mulhussey who has raised concerns relating to the lack of footpaths in the vicinity of the school on a road with a high volume of traffic. It is submitted that existing traffic calming measures are ineffective and children's safety are currently at risk.</p> <p>It is asked for the installation of footpaths and physical traffic calming measures. A map showing the location of children's residences are attached.</p>	
<b>Chief Executive's Response</b>	
<p>Traffic volumes and congestions are monitored regularly by the Council. Road improvements, upgrades, realignments, repairs, traffic management measures, traffic calming and improvements to road signage are assessed and implemented as deemed necessary, as resources allow and subject to availability. It should also be noted that a Road Safety Officer is available to discuss safety aspects relating to school.</p> <p>The provision of footpaths around educational facilities is supported in the Draft Plan under MOV POL 20 which states; <i>'To encourage, where appropriate, the incorporation of safe and efficient cycleways, accessible footpaths and pedestrian routes into the design schemes for town centres/neighbourhood centres, residential, educational, employment, recreational developments and other uses.'</i></p>	
<b>Chief Executive's Recommendation</b>	

No Change Recommended
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<b>Submission No.:</b>	MH-C5-46
<b>Submitted by:</b>	Cavan County Council
<b>Submission Theme(s):</b>	Chapter 5 Movement Strategy
<b>Summary of Submission:</b>	
<p>Cavan County Council are currently working through the planning phases of the N3 Virginia Bypass Scheme on behalf of TII and DTTAS and have the following comment with regard to the scheme.</p> <ol style="list-style-type: none"> <li>1. There is no reference to the N3 Virginia Bypass project which extends into the functional area of County Meath from the townland of Woodpole on the existing N3 to the county boundary of Cavan. It is asked the Meath Co. support the N3 Virginia Bypass in the Meath County Development Plan.</li> <li>2. It is recommended that the text in the Draft Meath County Development Plan 2020-2026 associated with the following sections be revised to reflect Meath County Council Support of the N3 Virginia Bypass:</li> </ol> <p><b>Chapter 5 – Movement Strategy</b></p> <ol style="list-style-type: none"> <li>a) <i>Section 5.3, Page 148 Sustainable Mobility</i>, 3rd Paragraph – Recommend reference to the N3 Virginia Bypass.</li> <li>b) <i>Section 5.8: Page 168 Developments of National and Regional Importance</i> Recommend including the following section on the N3 Corridor: The N3 corridor is a critical cross border economic route which is essential to facilitate strategic traffic movement and to maintain and improve connectivity to the North-West and border region. The importance of this route is recognised in both the National Development Plan 2018-2027 and the NPF 2040.</li> </ol> <p>The NPF identifies regional economic resilience and connectivity to the North-West as a strategic priority and the National Development Plan makes reference to the progression of the N3 Virginia Bypass which ties into the existing dual Carriageway in the jurisdiction of Meath Co. Council. The recently adopted Northern and Western RSES supports the TII and Cavan Co Council in the Planning and delivery of this strategically important Scheme. The delivery of these works will be supported and facilitated by the Council in conjunction with Cavan County Council, TII and the Department of Transport, Tourism and Sport.</p> <ul style="list-style-type: none"> <li>• MOV OBJ 43: Table 5.1 of, Page 174/175. Recommend adding a new scheme: - N3 Virginia Bypass - To continue to facilitate and support Cavan County Council, TII and DTTAS in the planning and delivery of this transport project.</li> <li>• MOV OBJ 48, Page 176: Recommend adding a new paragraph: To work in conjunction with Cavan County Council in the planning and delivery of the N3 Virginia Bypass Scheme located within the administrative area of Meath County Council.</li> </ul>	
<b>Chief Executive's Response</b>	

Meath County Council supports the development of the N3 Virginia Bypass Scheme and concurs with the amendments proposed by Cavan County Council. These changes will be incorporated into Chapter 5 of the Draft Plan under the Movement Strategy.

#### **Chief Executive's Recommendation**

##### **Chp 5: Proposed Alteration No. 1:**

To amend Section 5.3, Page 148 Sustainable Mobility, 3rd Paragraph as follows:

A number of sections of the national road network will be progressed through pre-appraisal and early planning during 2018 to prioritise projects which are proceeding to construction in the National Development Plan, these projects include: N3 Clonee to M50, **N3 Virginia Bypass**, N2 Rath Roundabout to Kilmoon Cross, N2 Ardee to south of Castleblaney and N2 Clontibret to the Border. A number of local roads are listed in the NDP for progression over the life of the plan the Bettystown/Laytown Spine Road is included.

##### **Chp 5: Proposed Alteration No. 2:**

To amend Section 5.8: Page 168 Developments of National and Regional Strategic Importance

##### **5.8.4 N3 Corridor**

**The N3 corridor is a critical cross border economic route which is essential to facilitate strategic traffic movement and to maintain and improve connectivity to the North-West and border region. The importance of this route is recognised in both the National Development Plan 2018-2027 and the NPF 2040.**

**The NPF identifies regional economic resilience and connectivity to the North-West as a strategic priority and the National Development Plan makes reference to the progression of the N3 Virginia Bypass which ties into the existing dual Carriageway in the jurisdiction of Meath Co. Council. The recently adopted Northern and Western RSES supports the TII and Cavan Co Council in the Planning and delivery of this strategically important Scheme. The delivery of these works will be supported and facilitated by the Council in conjunction with Cavan County Council, TII and the Department of Transport, Tourism and Sport.**

Chp 5: Proposed Alteration No. 3 has been addressed under the TII submission MH-C5-112 which has amended Table 5.1 on p174/175 to include the follow scheme:

**N3 Virginia Bypass - To continue to facilitate and support Cavan County Council, TII and DTTaS in the planning and delivery of this transport project.**

##### **Chp 5: Proposed Alteration No. 4:**

To include the following objective:

**MOV OBJ 49 To work in conjunction with Cavan County Council in the planning and delivery of the N3 Virginia Bypass Scheme located within the administrative area of Meath County Council. This project will subject to the outcome of the Appropriate Assessment process.**

<b>Submission No.:</b>	MH-C5-52
<b>Submitted by:</b>	Barr O Breaslain
<b>Submission Theme(s):</b>	Chapter 5 Movement Strategy
<b>Summary of Submission:</b>	
This submission requests the removal of the M4 Toll Plaza at Enfield due to the volume of articulated traffic using the Enfield ring road to avoid toll payment and consequent road safety	



concerns.

**Chief Executive's Response**

The management and consequent placement or removal of Toll Plazas are outside the remit of the County Development Plan process. As such, no action can be taken in relation to the above proposal.

**Chief Executive's Recommendation**

No Change Recommended.

<b>Submission No.:</b>	MH-C5-127
<b>Submitted by:</b>	Ciaran Buckley
<b>Submission Theme(s):</b>	Chapter 5 Movement Strategy
<b>Summary of Submission:</b>	
<p>This submission has been made by a number of the residents on the Ballybin Road and requests a designated bus stop, a connecting footpath for the area and request that, in the interim, the Ballybin road should be restored to a Request Stop Area for Bus Eireann.</p>	
<b>Chief Executive's Response</b>	
<p>The Ballybin road is currently served by the 103 and 109a which stops at a designated bus stop further north on the Ballybin Road. The proposed works would be assessed and completed on the basis of need and would be subject to the availability of funding and resources.</p> <p>The Draft Plan supports the provision of bus infrastructure through the following high level objective MOV OBJ 10 which states <i>'To identify deficits in bus infrastructure and develop a priority list as a basis to secure funding for improvement works, including the provision of bus shelters, bus stops and travel information at stops.'</i></p>	
<b>Chief Executive's Recommendation</b>	
No change recommended	

<b>Submission No.:</b>	MH-C5-209
<b>Submitted by:</b>	David Boyne
<b>Submission Theme(s):</b>	Chapter 5 Movement Strategy
<b>Summary of Submission:</b>	
<p>This submission recommends the cancellation of the Leinster Outer Orbital Route project having raised concerns relating to environmental and cultural heritage impacts. The submission instead suggests the development of a railway route or development of a ring road closer to the Dublin City which would require a less land.</p>	
<b>Chief Executive's Response</b>	

Section 5.8.2 of the Draft Plan addresses the Leinster Outer Orbital Route, now known as the Leinster Orbital Route. The Draft Plan reflects the position of the overarching Greater Dublin Area Transport Strategy and must protect the route from development when a route corridor has been finalised.

The final road design will be subject to a full Environmental Impact Assessment and Appropriate Assessment that will assess and potential impacts of the proposed route on the environment as part of the design and planning application process. This includes impacts on agricultural land take, bog lands and culturally sensitive areas such as Tara.

With regard to the development of a rail link, the Council remains strongly committed to the delivery of the rail to Navan and a strong policy stance is set out in the Draft Plan in support of this. The detailed designed alignment reflects that prepared and advanced by Iarnrod Éireann and confirmed by the NTA. The alignment is protected from further development through the R1 Rail Corridor objective and specific zoning objective R1 Rail Corridor which seeks 'to provide for a strategic rail corridor and associated physical infrastructure'.

#### **Chief Executive's Recommendation**

No Change Recommended

<b>Submission No.:</b>	MH-C5-210
<b>Submitted by:</b>	Drumconrath GFC
<b>Submission Theme(s):</b>	Chapter 5 Movement Strategy
<b>Summary of Submission:</b>	
This submission requests that the Meath CDP include an objective to continue the footpath from Drumconrath Village to the GFC grounds at Birdhill to provide safe access for users of the facilities at the grounds.	
<b>Chief Executive's Response</b>	
<p>There is merit in this proposal. However, Road improvements, upgrades, realignments, repairs, traffic management measures, traffic calming and improvements to road signage across the county are assessed and implemented as deemed necessary, as resources allow and subject to availability.</p> <p>The provision of footpaths around recreational facilities is considered to be adequately covered in the Draft Plan under MOV POL 20 which states; <i>'To encourage, where appropriate, the incorporation of safe and efficient cycleways, accessible footpaths and pedestrian routes into the design schemes for town centres/neighbourhood centres, residential, educational, employment, recreational developments and other uses.'</i></p>	
<b>Chief Executive's Recommendation</b>	
No Change Required.	

<b>Submission No.:</b>	MH-C5-250
<b>Submitted by:</b>	Cllr. Mike Bray

<b>Submission Theme(s):</b>	Chapter 5 Movement Strategy
<b>Summary of Submission:</b>	
<p>This submission relates to the provision of public transport and seeks the following objective:</p> <p>‘To work with the NTA, Bus Éireann and other relevant organisations to improve the public transport connectivity in Oldcastle to Dublin as well as to county and regional towns.’</p>	
<b>Chief Executive’s Response</b>	
<p>As with our response previous response, the Council is strongly committed to the promotion of sustainable means of travel, including public bus services and the encouragement of modal change from private car to such sustainable means of travel. However, the Council is not directly responsible for public transport provision. The Department of Transport and the NTA are the principal agents for delivery of transport policy and development in the Greater Dublin Area. Other agencies involved in the provision and improvement of public transport include Iarnród Éireann, the Railway Procurement Agency, Bus Éireann etc. Whilst the Council does not have a direct role in the provision of public transport services, it is actively promoting and facilitating the improvement of both bus and rail services both within and from County Meath and is committed to working in conjunction with all transport providers and stakeholders in terms of the delivery of a reliable, accessible and integrated transport network that supports the effect functioning of the county.</p>	
<b>Chief Executive’s Recommendation</b>	
No change recommended.	

<b>Submission No.:</b>	MH-C5-251
<b>Submitted by:</b>	Cllr. Mike Bray
<b>Submission Theme(s):</b>	Chapter 5 Movement Strategy
<b>Summary of Submission:</b>	
<p>This submission relates to the provision of public transport and seeks the following objective:</p> <p>To work with the NTA, Bus Éireann and other relevant organisations to improve the public transport connectivity in Athboy to Dublin as well as to county and regional towns.</p>	
<b>Chief Executive’s Response</b>	
<p>As per our previous responses to Crossakiel and Oldcastle, the Council is strongly committed to the promotion of sustainable means of travel, including public bus services and the encouragement of modal change from private car to such sustainable means of travel. However, the Council is not directly responsible for public transport provision. The Department of Transport and the NTA are the principal agents for delivery of transport policy and development in the Greater Dublin Area. Other agencies involved in the provision and improvement of public transport include Iarnród Éireann, the Railway Procurement Agency, Bus Éireann etc. Whilst the Council does not have a direct role in the provision of public transport services, it is actively promoting and facilitating the improvement of both bus and rail services both within and from Co. Meath and is committed to working in conjunction with all transport providers and stakeholders in terms of the delivery of a reliable, accessible and integrated transport network that supports the effect functioning of the county.</p>	
<b>Chief Executive’s Recommendation</b>	

No change recommended.
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<b>Submission No.:</b>	MH-C5-425
<b>Submitted by:</b>	Eoin Corrigan
<b>Submission Theme(s):</b>	Dunshaughlin Written Statement
<b>Summary of Submission:</b>	
<p>This submission supports objective DNS OBJ 8 however objects to DNS OBJ 9 which states 'To facilitate the completion of the Eastern Relief Road from the Dublin Road to the Lagore Road and onto the Red Bog Road to the east and south-east of the town.</p> <p>Lagore road is entirely residential and is currently relatively quiet and safe for walking and cycling. It is identified as cycling route M15 according to the NTA's "Cycle Network Plan for the greater Dublin Area" sustainably connecting Dunshaughlin to Ratoath.</p> <p>To open a "relief road" from the Dublin Road to the Lagore Road would take private cars off the old N3 and allow them to make a rat run through Lagore Road. Residents would immediately be faced with congestion and pollution during peak hours and speeding during off peak hours. Cyclists including many school children would no longer be able to safely cycle on this route as it would be saturated with cars.</p> <p>If a connection is made from the Dublin Road to the Lagore Road it should be for walking and cycling only. Thru traffic should not be allowed onto Lagore road until such a time that the relief road is completed all the way to the Redbog road. At this time, traffic will be able to remain on the relief road and only local traffic will need to join the Lagore road.</p>	
<b>Chief Executive's Response</b>	
<p>The proposal to develop an Eastern Relief Road is designed to improve traffic movements around the town of Dunshaughlin and will improve permeability and connectivity between many residential areas within the town. The delivery of the Eastern Relief Road will also benefit residents on the Lagore Road as they will have greater access to the R147 Dublin Road through providing an alternative to driving through the main street. On basis of the reasons outlined, the provision of the Eastern Relief road must be supported in the Draft Plan.</p> <p>Traffic Management measures on the Lagore Road, if required, can be carried out and will be supported by MOV OBJ 40 of the Draft Plan which provides that <i>'To implement a programme of traffic and parking management measures in towns and villages throughout the County, as resources permit.</i></p>	
<b>Chief Executive's Recommendation</b>	
No change recommended.	

<b>Submission No.:</b>	MH-C5-468
<b>Submitted by:</b>	Michael Smith
<b>Submission Theme(s):</b>	Chapter 5 Movement Strategy
<b>Summary of Submission:</b>	
<p>This submission seeks to prioritise the upgrade from the Rath Roundabout to Kilmoon to reduce the volume of traffic on the N2 and consequent traffic that filters down to the L50161.</p>	
<b>Chief Executive's Response</b>	

The National Development Plan makes particular reference to and prioritises the upgrade to the N2 from Rath Roundabout to Kilmoon Cross section of road which is already underway. The Draft Plan, Chapter 5, Section 5.8.3 highlights the important role of the N2 corridor. The delivery of these works will continue to be supported and facilitated by the Council and the Council will seek the delivery of the Slane Bypass in the future in conjunction with TII and the Department of Transport, Tourism and Sport. MOV OBJ 31 is set down to ensure continued support for upgrades to the N2 as follows: *‘To continue to support and facilitate TII, Fingal County Council, Louth County Council and Monaghan County Council in the planning and delivery of upgrades to the N2, as appropriate’.*

#### Chief Executive’s Recommendation

No change recommended.

<b>Submission No.:</b>	MH-C5-475
<b>Submitted by:</b>	Mulhussey NS Parents Association
<b>Submission Theme(s):</b>	Chapter 5 Movement Strategy
<b>Summary of Submission:</b>	
<p>This submission has been made by the Principal of Mulhussey NS Parents Association who has raised concerns relating to the lack of footpaths in the vicinity of the school on a road with a high volume of traffic. It is submitted that existing traffic calming measures are ineffective and children’s safety are currently at risk.</p> <p>It is asked for the installation of footpaths and physical traffic calming measures. A map showing the location of children’s residences are attached.</p>	
<b>Chief Executive’s Response</b>	
<p>Traffic volumes and congestions are monitored regularly by the Council. Road improvements, upgrades, realignments, repairs, traffic management measures, traffic calming and improvements to road signage are assessed and implemented as deemed necessary, as resources allow and subject to availability. It should also be noted that a Road Safety Officer is available to discuss safety aspects relating to school.</p> <p>The provision of footpaths around educational facilities is addressed in the Draft Plan under MOV POL 20 which states; <i>‘To encourage, where appropriate, the incorporation of safe and efficient cycleways, accessible footpaths and pedestrian routes into the design schemes for town centres/neighbourhood centres, residential, educational, employment, recreational developments and other uses.’</i></p>	
<b>Chief Executive’s Recommendation</b>	
No Change Recommended	

<b>Submission No.:</b>	MH-C5-483
<b>Submitted by:</b>	Noel Dalton
<b>Submission Theme(s):</b>	Chapter 5 Movement Strategy
<b>Summary of Submission:</b>	
<ol style="list-style-type: none"> <li>1. This submission supports the development of a railway line but believes the route should be amended to pass through major centres of population growth and suggests that</li> </ol>	

though initial costs would be greater, the long term benefits would outweigh this e.g. easy access to local train stations in major towns which would be within walking or cycling distance - therefore requiring less parking space for cars. The author believes that a review should be carried out to consider a more ambitious alternative plan to the one originally proposed.

2. The submission states that Map 5.1 Rail Reservation corridor has designated far more land than was necessary for the purpose of constructing the rail line to Navan. The landowners concerned have been restricted for c. 10 years on the basis of a draft proposal, without planning permission, and not knowing how long more they will be expected to wait for any finalisation of their position.

As an affected landowner, it is requested that greater effort to engage the citizens impacted by the rail proposal is made, whatever the future for the railway.

#### **Chief Executive's Response**

1. The Council remains strongly committed to the delivery of the rail to Navan and a strong policy stance is set out in the Draft Plan in support of this. The detailed designed alignment reflects that prepared and advanced by Iarnród Éireann and confirmed by the NTA. It is the responsibility of the Council to protect these lands from further development through the R1 Rail Corridor objective and specific zoning objective R1 Rail Corridor which seeks 'to provide for a strategic rail corridor and associated physical infrastructure'. The re-evaluation of the proposed route is would be contrary to national and regional transport policy and is not within the remit of Meath County Council.
2. In the absence of detailed groundworks investigations, the Rail Reservation Corridor must encompass a wider tranche of land than the final rail line to ensure the viability of the route. Reducing the width of the preserved corridor cannot be carried out until the detailed groundworks investigations have been completed. Though this inconvenience to landowners is acknowledged, it is imperative the rail line is sufficiently preserved to allow flexibility for the finalised rail layout.

#### **Chief Executive's Recommendation**

No Change Recommended.

<b>Submission No.:</b>	MH-C5-505
<b>Submitted by:</b>	Councillor Francis Deane
<b>Submission Theme(s):</b>	Chapter 2 Core Strategy, Chapter 3 Settlement Strategy, Chapter 4 Employment and Economic Strategy, Chapter 5 Movement Strategy, Chapter 6 Infrastructure Strategy, Chapter 7 Community Building Strategy, Chapter 9 Rural Development Strategy, Chapter 10 Climate Change
<b>Summary of Submissions:</b>	
This submission highlights a number of concerns in relation to the Draft Plan:	
<ol style="list-style-type: none"> <li>1. It is submitted that the core strategy should ensure that there is adequate quantum of housing at low cost prior to constrain populations. In this regard changes to CS POL 1, CS POL 2 and CS POL 7 are proposed. <ul style="list-style-type: none"> <li>• In the case of CS POL 1 it is intended to delete the word 'managing' and insert 'encouraging'.</li> </ul> </li> </ol>	

- In the case of CS POL 2 it is intended to insert the words “in order to ensure cheap residential development land” at the end of the sentence.
  - In the case of CS POL 7 it is proposed to remove the words “Post 2026.”
2. It is submitted that there is a deficit of community, educational and sporting facilities in areas such as the south-east of Navan and it is submitted that lands should be released for development if there is a community benefit such as the provision of much needed infrastructure.
  3. It is submitted that there should be an online mapping tool provided to outline services/infrastructure capacity that is available so as to encourage competition in development.
  4. In relation to SH OBJ 2, the term “sufficient land’ is queried and it is stated that this generally is considered in the context of supply and demand.
  5. The operation of the vacant site levy is important the release of appropriate lands.
  6. It is submitted that the policies aimed at securing compact urban areas with concentric development need to ensure that they do not inflate the cost of building land. There is clearly a strong relationship between zoned residential land and the price of housing. Planning provides many public-goods, but it can also create artificial scarcity of residential development land, which should be avoided.
  7. In the context of SH OBJ 4, if appropriate benefits such as community development can be provided then lands on the outskirts of a town should be released as a priority and in this regard the approach to ‘order of priority’, should be reconsidered.
  8. In relation to SH OBJ 12 it is submitted that Ratoath and Ashbourne should be linked to the Airport by a rail link.
  9. Spacious apartments should be provided as they are more appropriate for someone with limited mobility.
  10. Tourism is an important part of the Meath’s economy and the proximity to Dublin Airport and Dublin should be exploited further. This includes further support on Ireland’s Ancient East tourism drive. A number of tourism proposals could be provided including promoting the riparian Boyne Corridor, restoring the Boyne Navigation System, providing a new visitor centre in relation to Monastic Past and the Book of Kells as well as engaging with Bord Fáilte on potential for craft tourism. It is proposed that tourism infrastructure should be located near high amenity areas, the number of bed spaces should be increased, should be provided at a competitive price and that this will improve the attractiveness of Meath as a high value employment location. Tourism can revitalise the rural economy and ensure that employment can be provided without a reliance to commute to Dublin. In this regard these tourism facilities can provide high value jobs and attract other employment opportunities.
  11. A Third Level College should be provided in Navan as this has the potential to improve employment opportunities.
  12. It is submitted that there would be some benefit in carrying out an in depth consultation with commuters to determine the level of demand for different destinations and the demand for travel at particular times. Such a survey would do a lot to inform how public transport can be expanded to meet demand.
  13. The provision of park and ride facilities in Meath towns would assist in encouraging more people to move towards public transport, as would financial incentives such as extending the Dublin region fare capping zones.
  14. It is submitted that the Outer Orbital Route Project should be evaluated again.
  15. It is submitted that an extensive audit of Navan should be undertaken to determine if more roundabouts, traffic control measures and pedestrian crossings are required. There are points along the R147 where congestion could be eased by roundabouts. It is also noted that many educational facilities re on the west of the Boyne and Blackwater rivers



and that this should be considered.

16. In relating to existing Built Infrastructure, it is vital we carry out an audit of buildings roads footpaths access points bus stops etc. to ensure that they are constructed in relation with best possible practice to protect the young and vulnerable and facilitate persons with varying abilities and disabilities to have the fullest access possible in our society and services.
17. It is submitted that Meath County Council should provide clarity on how the transition to a net zero carbon future can be achieved in a manner that sustains economic activity and growth, and how this approach will impact on future development plans. It is suggested that the task of getting the heating and transport sector to a net carbon zero regime is enormous and that the task should be started by identifying:
  - The location, age, size, energy consumption, and the measures needed to bring each house to net carbon zero. This would allow some estimate to be made as to likely costs, and labour, skills and material resources required.
  - We need to access the transports needs and requirements of our Meath Population on an individual basis in order to determine how to the transport transition problem.
18. It is also submitted that the term sustainability will be interpreted in the context as meaning net carbon zero.
19. It is considered that the Draft Plan provisions in relation to rural development will significantly restrict people from rural areas. It is considered that the rural development strategy proposed is premature pending the replacement of the Sustainable Rural Housing Guidelines for Planning Authorities 2005.
20. It is highlighted that rural businesses start in a small way and grow from profits earned. In this regard it is submitted that the proposed rural development strategy is not consistent with the manner in which family farms are handed down from generation to generation. It is unreasonable for a Planning Authority to expect the younger person helping on the farm to own the farm as a condition for Rural Housing.
21. It is also considered that the 10 year rule undermines the EU principle of free movement.
22. The 25 acre rule also seems to ignore the potential for new types of enterprises such as snail farming which is highlighted in this case.
23. It is also considered that there is a need for people to live near ageing parents and relatives who need care and support.

#### **Chief Executive's Response**

1. It is noted that the quantum of housing is consistent with the population increase that is specified for Meath as part of the Regional Spatial and Economic Strategy for the Eastern and Midland Region 2019-2031. Furthermore, it is a requirement of the Planning and Development Act 2000-2020 that the Draft Plan is consistent with the above mentioned Regional Plan. It is considered that this has been achieved in relation to the Core Strategy. In relation to the requested change to CS POL 1 manner of encouraging development it should be noted that Meath Council has a statutory obligation to manage and control development of the county. In relation to the provision of cheap residential development land, and the request in relation to CS OBJ 2 this is not the statutory role of Meath County Council and as such this change would be inappropriate. In relation to the change at CS OBJ 7 if these lands were to be available for development this would result in over zoning and the Draft Plan being inconsistent with the requirements of Section 10(A)(f) of the Planning and Development Act 2000-2020. As such no change is proposed.
2. It is considered that sufficient lands have been zoned as part of the Draft Plan for community infrastructure purposes. It is also noted that a number of policies have been outlined as part of Chapter 7 Community Building Strategy. In relation to Navan it is also noted that this matter will be addressed as part of the local area plan that is to be

- prepared in line with SH OBJ 5.
3. As part of the preparation of the Draft Plan the Planning Authority engaged and worked closely with these infrastructure/service providers as well as relevant sections of the Local Authority to accommodate future growth, in line with Meath County Council's statutory obligations for preparing such a map. It should be noted that the Department of Public Expenditure and Reform is leading the way with its Open Data Initiative for all of Ireland's State Agencies to enable access to data of local and national importance. Meath County Council support this, however, it should be noted that different maps and data are restricted or require licences and as such it would not be possible for Meath County Council to provide the requested map.
  4. It is also noted that the term "sufficient land" refers to the quantum of land required to accommodate the population growth specified in the Eastern and Midland Regional Assembly Regional Spatial and Economic Strategy. This has already been achieved within the Draft Plan.
  5. SH OBJ 21 outlines an objective to implement the Vacant Site Levy and as such this has been addressed. Meath County Council remain committed to delivering on this national initiative as part of its active land use management strategy.
  6. The implementation of the Draft Plan in line with the population projections that have been set out at national and regional level and should ensure that the planning process does not adversely impact on the delivery of development land. It should be noted that this has been considered as part of national and regional planning policies. Meath County Council must ensure consistency between the CDP and the higher tier spatial planning documents of the RSES and NPF.
  7. As noted above, it is considered that sufficient lands have been zoned as part of the Draft Plan for community infrastructure purposes. It is also noted that a number of policies have been outlined as part of Chapter 7 Community Building Strategy. If the potential delivery of community infrastructure was used solely as a basis to allow for the release of land this could result in community facilities being provided in inappropriate places such as the edge of a settlement rather than in preferable locations such as close to the centre of a town.
  8. The exploration of all options for improved access to the National Airport within County Meath would be of interest to the Council. Presently, there is no national support to link Ashbourne to Dublin Airport by rail. Notwithstanding this, Meath County Council are committed to working with the in conjunction with all transport providers and stakeholders to improve links to Dublin Airport.
  9. Ministerial guidance under Section 28 of the Planning and Development Act 2000-2020 specifics appropriate apartment/dwelling sizes and as such it is not within the remit of the Planning Authority to address this. The areas specified in the guidelines comply with Sustainable Urban Housing; Design Standards for New Apartments', Guidelines for Planning Authorities (2018).
  10. A significant portion of the Draft Plan addresses the importance of the Tourism sector to County Meath and it is submitted that this has been adequately considered in Sections 4.24-4.29 of Chapter 4 Economic and Employment of the Draft Plan. Whilst this as well as sections of the Meath Economic Development Strategy 2014-2022 support and facilitate tourism, the delivery of a number of these facilities is the responsibility of third party bodies, including national agencies.
  11. SOC POL 15 seeks to facilitate that provision of Third Level facilities in the county and Planning Authority will support any such proposals in line with this policy.
  12. The completion of Outbound Commuter Surveys have been carried out by the NTA for a number of settlements and a breakdown of the mode of travel taken by commuters derived from NTA and Census data will be incorporated into the Written Statements of

the larger settlements. These figures offer the most accurate representation of commuting patterns in Meath. It is a specific aim of the CDP and the Economic Strategy to address and reduce out bound commuting with County Meath. Please refer to the response and recommendation of the OPR submission for details.

13. A number of locations are proposed in the Draft Plan for the development of feasibility studies for assessment of park and ride facilities, while Section 5.7.3 of the Plan provides a suite of supportive policies and objectives for Park and Ride facilities. It should also be noted that in 2020, a Park & Ride Development Office was established in the NTA to coordinate the delivery of park and ride facilities nationally. While the work of this office has only recently commenced, Meath County Council will consult with this office in consideration of park and ride facilities at all locations.
14. Please refer to TII response to Leinster Orbital Route.
15. This is supported under MOV OBJ 1 of the Draft Plan which aims 'To prepare and commence implementation of, Local Transport Plans (LTP), in conjunction with the NTA and relevant stakeholders, Drogheda (in conjunction with Louth County Council as part of the Joint Urban Plan), Ashbourne, Navan, Ratoath, other settlements where appropriate. It is considered that requirement for roundabouts, traffic control measures and pedestrian would be addressed in Transport Plan.
16. With regard to existing built infrastructure and best possible practice to protect the young and vulnerable and facilitate persons with varying abilities and disabilities, any upgrades carried out by Meath County Council will be carried out in accordance with Part M of the latest Building Regulations 2010, which ensures works satisfy the needs of people with disabilities, elderly people, including people with young children in buggies, people with temporary injuries etc. The upgrade of such infrastructure however, is subject to the availability of funding and resources.
17. It is agreed that the transition to a net zero carbon future will require a considerable resources and investment in both the heating and transport sector. The Draft Plan does not exert control over the retrofitting of existing buildings to improve energy efficiency and such measures will require alternative incentivisation.

Notwithstanding this, Renewable Energy and Energy Efficiency in new developments are supported by a suite of policies and objectives ranging from INF POL 34 to INF OBJ 49 of the Draft Plan. These supports range from promotion of sustainable energy resources to energy efficient building designs and are expected to considerably influence the future development in Co. Meath towards a net zero carbon future

The Draft Plan contains a range of transport, renewable energy and energy efficiency objectives and policies that support and encourage the goal of significantly reducing carbon emissions in new development projects.

With respect to more sustainable transport measures, the Draft Plan has an increased focus on sustainable mobility in the form of improved public transport, increased pedestrian and cyclist linkages and the roll out of EV Plug-In to encourage the use of Electric Vehicles. Data on existing transport modes taken by the Meath population have been extrapolated, in conjunction with the NTA and the Draft Plan now sets out sustainable transport targets for the main settlements in County Meath subject to the required resources and funding.

18. Sustainable Development is development which meets the needs of the present without compromising the ability of future generations to meet their own needs.' Sustainable development is a continuous, guided process of economic, environmental and social change aimed at promoting wellbeing of citizens now and in the future. To realise this

requires creating a sustainable and resource-efficient economy founded on a fair and just society, which respects the ecological limits and carrying capacity of the natural environment.

19. Please refer to Part 3 of Report which addresses Grouped Themed Submissions, specifically Grouped Themed Submission No. 1 Rural Housing Policy in relation to pts no. 18-22 above.

#### Chief Executive's Recommendation

1. No change recommended
2. No change recommended
3. No change recommended
4. No change recommended
5. No change recommended
6. No change recommended
7. No change recommended
8. No change recommended
9. No change recommended
10. No change recommended
11. No change recommended
12. Refer to OPR Submission (MH-C5-816)
13. No change recommended
14. No change recommended
15. No change recommended
16. No change recommended
17. No change recommended
18. -22. As per Grouped Themed Submission No. 1 Rural Housing Policy (Grouped Themed Submission no. 1)

#### Submission No.:

MH-C5-506

#### Submitted by:

Ronan Moore

#### Submission Theme(s):

Chapter 1 Introduction, Chapter 4 Economy and Employment Strategy, Chapter 5 Movement Strategy, Chapter 7 Community Building Strategy Chapter 8 Cultural and Natural Heritage Strategy, Chapter 9. Rural Development Strategy

#### Summary of Submission:

This submission raises a range of areas within the Draft Development Plan and makes a number of policy recommendations which are outlined below.

1. Much of the county is poorly served both by national and international standards. Leap status does not extend out to Enfield and this is reflected in the poor numbers of rail commuters. Suggest removing 'well developed' from Section 1.1 County Overview.
2. Suggestion to amend to read "To strengthen the social and economic structure of rural towns and villages by supporting the re-use of existing buildings and the regeneration of under-utilised buildings and lands, with particular emphasis on the support of shared community facilities and broader community groups and councils."
3. Include a new CS objective to read – "To develop a strategy and identify specific targets and time-lines for creation of co-working facilities, digital hubs/eHubs, eWorking centres and other work-from-home/work-from-community options throughout the county".
4. Add a new objective to read "To use the National Planning Framework's Hierarchy of

Settlements and Related infrastructure as a criterion of success and to evaluate all settlements within Meath, thus identifying infrastructural gaps.”

5. Modify SH Obj 5 to read “To prepare new local area plans for the following settlements within the lifetime of this Plan: Navan, Dunboyne/Dunboyne North/Clonee, Ashbourne, Kells, Trim, Dunshaughlin, Ratoath, Bettystown-Laytown-Mornington East-Donacarney-Mornington, Oldcastle, Athboy, Duleek, and Stamullen”, thereby including Enfield and reflecting CS Obj 9, that had previously included Enfield.
6. The inclusion of a range of objectives to support disability and elderly housing as follows: SH Pol “To promote Universal Design and Lifetime Housing in accordance with best practice and the policies and principles contained in Building for Everyone: A Universal Design Approach (National Disability Authority, 2012) and Sustainable Residential Development in Urban Areas: Guidelines for Planning Authorities and its companion document Urban Design Manual (DEHLG, 2008).”
7. Inclusion of the following new objectives: SH Obj “Promote Universal Design and Lifetime Housing\* in all new developments, requiring that 20% of dwellings in all new housing estates of five dwellings or more are suitable to accommodate or are adaptable to provide accommodation for people with disabilities. Developers will be required to show an accessible route to the residential units and surrounding services.  
\* Lifetime Housing is a type of housing allows for the future adaptation of units as needs present throughout the life cycle of the occupier/owner. It is a proactive step in addressing the housing needs of people with a disability, the elderly and the diversity of the family unit, as well as increasing the value and sustainability of buildings in the long term.”
8. Given that a growing number of wheelchair users use larger powered chairs or are themselves larger, and that old social housing stock is less-disability friendly I would like to include new objective to read: Sh Obj “Ensure that 7% of all social housing stock either bought or purchased is of universal design, with standards exceeding Part M regulations and are instead in accordance with best practice and the policies and principles contained in Building for Everyone: A Universal Design Approach (National Disability Authority, 2012) and Sustainable Residential Development in Urban Areas: Guidelines for Planning Authorities and its companion document Urban Design Manual (DEHLG, 2008).”
9. To help meet SH Pol 2 particularly “the utilisation of infill and brownfield lands in preference to edge of centre locations”, I wish to add to the Vacant Site Levy Objectives the following: Sh Obj “Shall prioritise the comprehensive mapping of vacant sites and their addition to the county Vacant Site Register in as timely a manner as possible”.
10. Underline the opportunity and importance of the former NEC Semiconductors site in Ballivor to include the following objective into Rural Enterprise: Ed Obj: “To take a proactive and flexible approach towards securing an alternative employment use for the former NEC Semiconductors site in Ballivor”.
11. Include a policy “To investigate the potential for an overall County Museum that would act as a gateway and springboard into the whole county”.
12. To include a policy to build on the county’s reputation for festivals and natural beauty.
13. To increase connectivity to transport hubs to include the following policy:  
Mov Pol: “To increase connectivity to existing and planned bus stops and train stations through the increase of Park and Ride facilities, particularly on the outskirts of settlements; the provision of secure bicycle parking lockers; and to work with the NTA to increase and provide more suitable bus stops in settlements so that would-be public transport users are within 8 minutes (400 metres) of.
14. In understanding the opportunities offered by the road side to include the following objective: “To identify and utilise the opportunities provided by roundabouts, verges and other road-side margins and support the implementation of ‘green roof\*’ bus stops to

increase bio-diversity”.

15. Recognising the environmental, social and physical benefits of cycling, I wish to include the following policy: Mov Pol: “To spend 10% of the annual transportation budget on cycling (not to include Greenway cycling - tourism - as part of this 10%).”
16. Understanding the importance to include people with a variety of needs, to include the following policy: Soc Pol: “To include a Changing Places facility\* as a condition of planning where practicable for new and refurbished community facilities”.
17. With regard to Youth Services, the following policy is suggested: “To support the identification and promote the creation of a suitable centralised premises in Meath for a Youth and Community Service that could house all relevant projects, groups and organisations that work with young people at risk, such as an After School Service; Garda Diversion Project; Probation Project; Youth Clubs, etc.”
18. With regard to post primary education, the submission requests additional consideration is given to Trim which in the last two years has seen over-subscription and over-building capacity in its post-primary schools and uncertainty around the location of the Educate Together National School.
19. Cognisant of the limited numbers of affordable and community childcare facilities for certain geographic parts of the county I wish to modify Soc Pol 20 to read: “To encourage, promote and facilitate the provision of quality affordable and community childcare facilities in accordance with national policy and relevant guidelines and in consultation with Meath County Childcare Committee”
20. Recognising the crucial role that a library service plays in a community and the imbalance of social infrastructure to residential homes in the town of Enfield I wish to modify Soc Obj 19 & include an additional objective to read:  
Soc Obj 19: “To investigate and if feasible to provide a new library in the Laytown/Bettystown area, in Kells and in Enfield”.  
Soc Obj: “To investigate and if feasible to provide a library facility in Enfield. To explore the restoration and renovation of existing buildings to accommodate such a use”.
21. Appreciating the economic, cultural and social role the night-time – specifically between the hours of 5pm and 5am – can play in the county, I wish to add the following objective  
Soc Pol: “To support the creation of a Night-Time Mayor with responsibility to develop a strategic plan to boost Meath’s night time economy – specifically between the hours of 5pm and 5am – to enhance its culture and increase domestic tourism.”
22. In recent times there has been growing concern around the detrimental effects of herbicides to biodiversity and human health. With this in mind I would like to add the following objective: Her Obj: “To trial alternatives to traditional herbicides, particularly glyphosates in dealing with ‘weed growth’ with the view to their elimination in the life-time of this plan.”
23. The inclusion of the following policy Rur Pol: “To support farmers in the promotion of field margins as crucial mediums of biodiversity and potential carbon sinks.”
24. Recognise the continuous growth of Enfield and modify DM Obj 4 to read: “To prepare a Public Realm Strategy for Kells, Ratoath and Enfield over the life of this Development Plan.”
25. Modifications of DM Obj 85 to read ‘All proposals for residential developments above 75 units shall incorporate works of public art into the overall scheme or make a financial contribution to the Council to provide the piece of public art in the nearby vicinity in order to enhance the amenities of local environment (Refer to Chapter 7, Community Building).’
26. Greater accommodation of EV charging points that that provided for in DM Obj 166 and 167
27. Requests that a large percentage of development contributions are re-invested in the



community where the development takes place

### Chief Executive's Response

This submission raises a number of substantive issues which have been summarised and numbered for clarity and consideration.

1. Section 1.1 of the Draft CDP provides an overview of the county detailing its geographical benefits which range from its locational advantage to its diverse landscape. Given the attractiveness of the county, the population of Meath has grown rapidly in recent years resulting in high levels of commuting from the County into the capital. Meath enjoys the presence of the four motorways, direct connectivity to Dublin Port and Dublin Airport and the presence of rail lines which traverse Co. Meath to provide train stations at Enfield, Laytown, Gormanstown and the M3 Parkway. Therefore, it is held that the county is supported by a well-developed road system and holds significant potential to develop its rail system further. Notwithstanding this and having regard to the levels of commuting that occur within the county, it is acknowledged that availability of public transport does not adequately serve the needs of the county. Meath County Council is therefore committed to redressing the imbalance that exists between the level of public transport available and the level of public transport required to respond to the needs of the county.

With regard to Leap Status for Enfield Train Station, the Council is committed to working with Irish Rail to support the expansion of the short hop pricing structure as set out in MOV OBJ 6 of the Draft Plan which aims *'To encourage and work in conjunction with Irish Rail to review the operation of the Short Hop Zone (SHZ) rail prices with an extension to stations in Laytown, Gormanstown and Enfield. This will allow savings of up to 24 percent on single tickets using a Leap Smartcard.'*

Therefore, no change is recommended

2. CS OBJ 6 outlines an objective to ensure the re-use of existing and under-utilised lands/buildings. The intention of this objective is not to limit application of this objective to a particular type of use. Given the policies and objectives outlined as part Chapter 7 Community Building Strategy and the quantum of lands zoned for community infrastructure in the relevant zoning maps, it is considered that sufficient measures have been outlined as part of the Draft Plan to promote the development of community infrastructure.

3. This matter has already been addressed as part of ED OBJ 4 and as such it is not considered that an additional objective is required as part of the Core Strategy.

4. It is noted that there is an implementation and monitoring section outlined as part of Appendix 15 of the Draft Plan and as such an additional objective as requested is not required.

5. The response to MH-C5-409 has addressed this matter. Please refer to this submission.

6. The promotion and facilitation of Universal Design is addressed as part of SH POL 7 and SH OBJ 28. In this regard the additional objective requested in this case is not required.

7. As outlined in SH OBJ 28, it is noted that the requirement for 5% of buildings to provide universal design accords with 'Building for Everyone: A Universal Design' developed by the Centre for Excellence in Universal Design (National Disability Authority). Given that this document was prepared by the National Disability Authority, it is considered appropriate at this time to accord with its recommendations. Requiring a higher percentage of units to comply with these



requirements could lead to unnecessarily high construction costs. Furthermore, it should be noted that Housing Strategy will be reviewed as part of the two-year review of the development plan and as such, if national guidance has been updated this will be reflected in a revised housing strategy that can be included in the Development Plan as part of a variation process.

8. The powers to ensure that buildings are constructed so as to allow for wheelchair access are addressed as part of the national Building Regulations (Part M) and as such is not a matter that can be detailed in the Draft Plan. Meath County Council do support the implementation of universal access as part of the Draft Plan and this is addressed as part of SOC POL 7.

9. The implementation of the Vacant Sites Levy is a matter that is addressed as part of planning legislation and as such it would be inappropriate to provide for additional measures other than those that are outlined in national legislation.

10. BAL OBJ 4 of Vol. 2 Settlement Statements of the Draft Plan has already addressed this matter.

11. A well-resourced County Museum would be a significant contribution to the cultural infrastructure of Meath. The establishment of a museum would need to be considered within the context of establishing a museum service in the county and would require the consideration of a number of factors including (but not limited to): initial capital investment, on-going operational costs, staffing, collections and care of collections, storage, outreach and education, the building (and environmental conditions and considerations). It is an action of the County Meath Heritage Plan 2015-2020 to 'Support a feasibility study on the provision of a county museum in consultation with national and local stakeholders and explore the development of a virtual (online) museum' (Action 5.7). A decision on a county museum would be premature pending the outcome of such a study.

12. The matter of festivals is addressed as part of Section 4.28.2 of the Draft Plan and in relation to natural beauty HER OBJ 45 and HER POL 51 address the protection and recreational value of places of natural beauty. As such there is no need to amend the Draft Plan on foot of this observation.

13. Section 5.7.3 of the Movement Strategy is dedicated to requirement for Park and Ride Facilities in County Meath. Mov Pol 13 specially encompasses the aim of the proposed suggested policy which states: *to promote and support the provision of Park-and-Ride facilities which improve public transport accessibility without exacerbating road congestion, or which cause increased car travel distances, at appropriate locations within the County.* This is considered to adequately address proposals to increase connectivity to existing and planned bus stops and train stations through the increase of Park and Ride facilities. It should be noted that the NTA set up a specific office in 2020 to undertake feasibility studies to provide for Park and Ride facilities at appropriate locations in the Greater Dublin Area including County Meath. No change is required in this instance.

14. Meath County Council have a Biodiversity Plan 2015-2020. The proposed measure to identify and utilise the opportunities provided by roundabouts, verges and other road-side margins and support the implementation of 'green roof\*' bus stops to increase bio-diversity is not included as part of the current Bio-diversity Plan. Furthermore, such an initiative would require would be subject to agreement with the NTA. It would be consider premature to include this objectives in the absence of discussion and agreement with the NTA. No change is recommended in this respect.

15. Given the nature of the funding mechanisms and the funding process, which is largely determined by Central Government, it is beyond the control of Meath County Council to commit an exact percentage of funding to cycling each year. The Council is nonetheless committed to the delivery of cycling projects subject to appropriate financial and planning approvals. It would also be considered overly restrictive to designate a strict allocation of 10 percent per annum to cycling. Therefore, no change is recommended in this respect.

It should be noted that cycle networks are identified in the NTA Cycle Network Plan for the Greater Dublin Area which can be found at the following link:

<https://www.nationaltransport.ie/publications/strategic-planning/gda-cycle-network-plan/>

This document outlines existing and required cycling infrastructure in both urban and rural areas of the region. Information outlined in that report will provide for cycle infrastructure projects to be prioritised in terms of the importance to the strategic network and the likely cycle demand for such a scheme. The Network Plan has provided Local Authorities with an evidence-based strategy for the implementation of cycle infrastructure that will see tangible returns for investment.

16. The point raised in relation to the provision of changing facilities is noted. However, the inclusion of a specific policy in relation to changing facilities is too prescriptive and outside the strategic nature of the Development Plan.

17. There are a number of youth facilities within the county including Youth Work Ireland Meath, Foroige and Involve. These provide youth club facilities and meeting space for all young people. Although the central base for most of these groups is Navan, attempts are being made to set up outreach centres in other parts of the county to ensure that young people have as much access to the services as possible. SOC OBJ 1 which refers to the provision of youth clubs/cafes in the County provides sufficient policy support in this regard.

18. With regard to post primary education in Trim, please refer to CE's Response and Recommendation to the grouped 'education' themed submissions for Trim.

19. SOC POL 20 covers both private and community childcare provision. It is not considered necessary to differentiate in this instance. It should be noted also that issues relating to childcare provision in the County is largely the responsibility of the Meath County Childcare Committee. The issue raised is noted and the Council will continue to liaise with MCCC in this regard.

20. A standalone site for a library in Enfield is not currently listed as a priority in the Library Development Plan. The plan is scheduled for review and consideration will be given to the need to upgrade or provide new libraries as part of that review process.

21. The issue of a night time mayor is outside the strategic land use scope of the Development Plan.

22. A key action of the recently adopted *Climate Action Strategy 2019-2024* is to '*To engage with the agricultural community to understand how the local council can support resilience efforts and sustainable farming practices*'. Meath County Council run a number of biodiversity awareness events every year through the implementation of its County Biodiversity Plan and County Heritage Plan Programme.

23. Agri-Environmental Schemes, administered through the Department of Agriculture, Food and the Marine, under the Rural Development Programme play a role in mitigating biodiversity threats and meeting commitments under Ireland's National Biodiversity Plan and the related

goals set out in various EU strategies and legislation. The main Agri-environment Schemes - Green, Low-carbon, Agri-Environment Scheme (GLAS) and Agri-Environment Options Scheme (AEOS) aim to meet the challenges of conserving and promoting biodiversity, encouraging water management and water quality measures and combating climate change.

24. In addition to the mandatory requirements under the Planning and Development Act 2000-2020 regarding Local Area Plans, Planning Authorities can also prepare a Local Area Plan for any part of its functional area. In this regard, it is also proposed to prepare a Local Area Plan for Enfield. This is supported by CS OBJ 9 of the Draft Plan and will provide a more comprehensive plan than a Public Realm Strategy which would focus only on the central area of Enfield and the physical attributes and social character of the village.

25. DM OBJ 55 refers to the local environment and therefore it is not considered necessary to add 'in the nearby vicinity'.

26. DM Obj 166 and 167 provides for 10% of total space numbers in car parks to accommodate Electric Vehicles. Should the uptake of Electric Vehicles increase leading to a greater demand for such spaces, the requirement of additional spaces can be reviewed as part of the 2 Year Progress Report and an increased minimum can be introduced by way of variation. It is however submitted that the proposed number of charging points adequately reflects the current anticipated requirement.

27. Development Contributions are collected via planning conditions on relevant planning permissions granted and in accordance with the Meath County Council Development Contributions Scheme (DCS). The current DCS will be reviewed within the next 12 months and members of MCC will have the opportunity to list projects that can be funded through the scheme.

#### **Chief Executive's Recommendation**

No Change Recommended.

<b>Submission No.:</b>	MH-C5-613
<b>Submitted by:</b>	Lee McGuire
<b>Submission Theme(s):</b>	Chp 5 Movement Strategy
<b>Summary of Submission:</b>	
<p>This submission refers to MOV OBJ 3 States "<i>(b) To explore in conjunction with Irish Rail and other stakeholders the feasibility of a future rail spur off the Navan-Dublin Rail line from Dunshaughlin to serve Ashbourne and Ratoath</i>" and instead recommends a feasibility study for a direct rail link to Ashbourne via Ratoath.</p> <p>The submission suggests rewording of MOV OBJ 3(b) as follows:</p> <p style="padding-left: 40px;">'To explore in conjunction with Irish Rail and other stakeholders the feasibility of an alternative route from Dublin which would serve Ashbourne and Ratoath'.</p>	
<b>Chief Executive's Response</b>	
<p>The Chief Executive notes the proposed amendment. Please refer to OPR submission for response.</p>	

**Chief Executive's Recommendation**

No Change Recommended

**Submission No.:**

MH-C5-723

**Submitted by:**

Delmere Residents Association

**Submission Theme(s):**

Enfield Written Statement

**Summary of Submission:**

This submission relates to future development of Enfield and has the following comments:

1. Enfield having experienced the highest population growth in the county between 2006 and 2016 and now with a projected housing allocation of 474 units and a population set to grow to 4239, the submission believes this is far too high for the town.
2. In information supplied to An Bord Pleanála in support of a recent Strategic Housing Application in Enfield [Planning Reference: SH304296], it stated: "Irish Water have advised that the existing Enfield WWTP is operating at its biological capacity."  
"The existing water supply serving Enfield is provided from a borewell which is currently at capacity" This differs from the Written statement which indicates there is still limited capacity in both. It is submitted that no further housing development should proceed until both of the above are upgraded.
3. Vehicular traffic regularly backs up to the Na Fianna GAA pitch and the Royal Oaks estate to the East of the town due to high volumes. Measures need to be introduced to divert this traffic to the relief road. Also, there is a lack of traffic calming measures to reduce regular instances of speeding.
4. Demarcated cycle lanes through the town could not be deemed as safe as they are not segregated from the traffic. In places, they are sandwiched between the road and parking bays where cars regularly pull in to park alongside it or on the lane itself, forcing cyclists onto the main vehicular portion of the road. The parking bays outside Tesco in Main Street mean that cars reverse out, thus creating a danger for cyclists.  
A long term, strategic plan with substantial investment to provide walking and segregated cycling infrastructure in the town is requested.
5. One major issue with this Relief Road is that traffic travelling East to West on it cannot make a right turn at the junction with Johnstown Road forcing all the traffic that is heading to Glen Abhainn [the largest housing estate in Enfield] down Enfield Main Street instead of along the Relief Road. With the proposed location of the new Post Primary in Enfield to be at the East end of town, opposite the Royal Oaks Estate, the traffic along Main Street will increase. It is proposed to replace the junction of R148 and Johnstown Road to a roundabout with appropriate pedestrian crossing points.
6. Overwhelming need for a planned Park and Ride facility but the proposal that it would be facilitated at the OPW but the building adjacent to SuperValu would only add to the congestion and serious safety concerns. An alternative Transport Hub located at the train station is suggested. An additional pick up and drop off stop could be located in the town for pedestrians.
7. Enfield has one of the youngest populations in the County. Except for sporting clubs, there are no other facilities for 12 - 18-year olds. It is vital that this group is catered for by way of activity centres e.g. Community Centre, Climbing Walls, Skate Park Multi Use Games Area etc.
8. Request that Enfield be included in the Shop Hop Zone facility.
9. The NPF sets out guidelines for what infrastructure should be available in towns and villages. With the population growth outlined earlier, the lack of the following

services be urgently addressed:

Community Centre, Primary Care Centre, only a part-time GP service 3 mornings a week, between 10am and 12pm, Library, full time garda presence, Enterprise Centre or Information Office, Sports/Activity Facility other than a Soccer and GAA club with outdoor pitches, Education - a post primary school is due to open Sep 2020 however there is no site identified for same and no plans have been lodged with the relevant planning authority. The capacity of the primary school is 650 pupils, there are currently 605 pupils in the school [enrolment figures 2019-20]. A housing allocation of 474 houses will put increased pressure on the provision of primary school places in the town.

#### **Chief Executive's Response**

The issues raised in this submission have been reviewed in detail and broken down to several key points which are numbered and responded to below.

1. It is noted that the core strategy has allocated 474 houses and this is based on the consideration of a number of matters including national and regional planning policy as well as ministerial guidelines, as outlined in Chapter 2 Core Strategy of the Draft Plan.
2. As correctly outlined in the Enfield Written Statement, currently spare water and wastewater capacity is limited. As a consequence, although some small-scale development can still be facilitated, currently there is insufficient spare capacity to serve large scale developments.

However, the Council is working closely with Irish Water to deliver a capital expansion of the Enfield Wastewater Treatment plant in 2023.

The Council is also working with Irish Water and some developers with lands in Enfield to progress works which would augment available water supply capacity. Future development in Enfield may be restricted until such times as additional capacity can be introduced to the waste water system.

3. The Plan provides for high level objectives, MOV OBJ 40 states 'To implement a programme of traffic and parking management measures in towns and villages throughout the County, as resources permit.' This is considered to adequately address the issue raised in this submission
4. EN OBJ 08 aims 'to continue to support and facilitate the extension of the footpath and cycle path improvement works within the town'. Furthermore, ENF OB 18 aims 'to seek improvements to the town centre public realm through the implementation of quality design and finishes and coherence in building heights and development proposals. It is considered that proposals to improve cycle lane safety could be completed under these objectives.
5. The Johnstown Relief Road has taken pressure from the main street. The lights have been developed for safe pedestrian access at this junction, and it is considered that the introduction of a right turn lane could lead to further delays on the by-pass thus creating additional traffic through the main street resulting in increased congestion.
6. This location of the proposed Park and Ride has been raised in a number of submissions relating to Enfield. This has been considered by the Transportation Department and it is contended that the bulk of issues raised in submissions relate to traffic and parking congestion on the main street. The Park and Ride has been identified at this location to alleviate this.

Park and Rides serve as intermodal transfer facilities to enable access to public transport. The proposed location for the Park and Ride will be adjacent to the Enfield Bus Stop

which will serve Routes 20, 115, 120cc, 763 and 847, the result of which is expected to alleviate on-street parking issues and subsequent traffic delays which arise from commuters parking on the main street to avail of the bus service. As per EN OBJ 8 of the Enfield Written Statement, Meath County Council is pursuing the provision of a Park and Ride subject to a Part 8 procedure upon which, stakeholders and members of the public will be provided with an opportunity to make a submission in respect of Park and Ride proposal.

8. The Council remains committed to working with Irish Rail to support an extension of the short hop zone pricing structure as set out in MOV OBJ 6 of the Draft Plan as follows: 'To encourage and work in conjunction with Irish Rail to review the operation of the Short Hop Zone (SHZ) rail prices with an extension to stations in Laytown, Gormanston and Enfield'.

#### Chief Executive's Recommendation

No Change Recommended

<b>Submission No.:</b>	MH-C5-826
<b>Submitted by:</b>	Dublin Airport Authority
<b>Submission Theme(s):</b>	Chapter 5 Movement Strategy
<b>Summary of Submission:</b>	
DAA welcome the incorporation of recommendations submitted at the pre-draft stage of the Draft Plan. This submission highlights the recent review of noise zones around Dublin Airport by Fingal County Council and the consequent replacement of the Inner and Outer Noise Zones with four new Zones, A, B, C and D and asks that the Meath CDP should be amended to reflect this.	
<b>Chief Executive's Response</b>	
The Chief Executive notes the supportive comments from DAA in relation to the role of Dublin Airport within the context of County Meath. It is noted that since the receipt of DAA's submission at pre-draft stage, the geographical extent of the noise zones for Dublin Airport have been revised. The associated policies, objectives and the Dublin Airport Safety Zone and Noise Zone Map will be updated to reflect the revised noise zones.	
<b>Chief Executive's Recommendation</b>	
Amend MOV OBJ 60 as follows: 1) To strictly control inappropriate development and require noise insulation where appropriate within the <del>Outer</del> <b>Noise Zone B and Noise Zone C and where necessary in Assessment Zone D</b> , and actively resist new provision for residential development and other noise sensitive uses within the <del>Inner</del> Noise Zone <b>A</b> , as shown on Map 5.4.1 and 5.4.2. 2) To ensure that under no circumstances shall any dwelling be permitted within the <del>69 dB LAeq 16h</del> <b>predicted ≥ 63 dB LAeq, 16hr and/or ≥ 55 dB Lnight</b> hours noise contour. 3) To require that comprehensive noise insulation is installed for any house permitted <b>within Noise Zone B or C</b> . Any planning application shall be accompanied by a noise impact assessment report produced by a specialist in noise assessment which shall specify all proposed noise mitigation measures together with a declaration of acceptance of the applicant with regard to the result of the noise assessment impact report'	
Amend DM POL 42 as follows: To strictly control inappropriate development and require noise insulation where appropriate within the <del>Outer</del> <b>Noise Zone B, Noise Zone C and where</b>	

**appropriate Assessment Zone D.”**

Amend DM POL 43 as follows: To actively resist new provision for residential development and other noise sensitive uses within the ~~Inner~~ Noise Zone **A**, as shown on Map no. 5.4.1 and 5.4.2

Amend DM POL 44 as follows: Under no circumstances shall any dwelling be permitted within the predicted **≥ 63 dB LAeq, 16hr and/or ≥ 55 dB Lnight** ~~69 dB LAeq 16 hours~~ noise contour. Residential development in areas likely to be affected by levels of noise inappropriate to residential use should be avoided.

Footnote RPO 8.19 as follows: Spatial planning policies in the vicinity of the airport shall protect the operation of Dublin Airport in respect to its growth and the safe navigation of aircraft from non-compatible land uses. Policies shall recognise and reflect the airport noise zones associated with Dublin Airport. Within the Inner Airport Noise Zone, provision of new residential and/or other noise sensitive development shall be actively resisted. Within the Outer Noise Zone, provision of new residential and/or other noise sensitive development shall be strictly controlled and require appropriate levels of noise Insulation in all cases.\*

***Airport Noise Zones updated in line with Environmental Noise Regulations 2006 and EU Regulations 598/2014***

Amend Map 5.4.1 and 5.4.2 to represent the updated Airport Noise Zones and Public Safety Zones.

<b>Submission No.:</b>	MH-C5-930
<b>Submitted by:</b>	Joseph Griffith
<b>Submission Theme(s):</b>	Chapter 5 Movement Strategy
<p>This submission requests the development of a footpath and bicycle track to be added to the Dublin Road in Trim as far as the Scurlogstown crossroads and Business Park. Doing so would assist in reducing traffic congestion and pollution and would provide a walkway for towns people and tourist.</p>	
<b>Chief Executive's Response</b>	
<p>Traffic volumes and congestion are monitored regularly by Meath County Council. Though there is merit in these proposals, road improvements, upgrades, realignments, repairs, traffic management measures, traffic calming and improvements to road signage can only be assessed and implemented as resources allow, subject to availability and as deemed necessary.</p> <p>The provision of footpaths around towns and villages are addressed in the Draft Plan under MOV POL 20 which states; <i>'To encourage, where appropriate, the incorporation of safe and efficient cycleways, accessible footpaths and pedestrian routes into the design schemes for town centres/neighbourhood centres, residential, educational, employment, recreational developments and other uses.'</i></p>	
<b>Chief Executive's Recommendation</b>	
No Change Required	

<b>Submission No.:</b>	MH-C5-943
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<b>Submitted by:</b>	Meath County Council Transportation Dept.
<b>Submission Theme(s):</b>	Chapter 5 Movement Strategy
<b>Summary of Submission:</b>	
<p>This submission provides a number of recommendations and clarifications to Chapter 5 Movement Strategy in the Draft CDP. This relates to the following:</p> <ol style="list-style-type: none"> <li>1. Where there is more than one policy/objective relating to the same project, these should be revised to ensure wording is consistent. For ex. MOV OBJ 33, MOV OBJ 36, SLN OBJ 7 and MOV OBJ 43, SLN OBJ 10 and SLN OBJ 11 appear to relate to the position set out in the current CDP and are not consistent with the position set out in the main written statement of the Draft CDP and should be removed.</li> <li>2. Inclusion of route corridor for Slane Bypass in book of maps.</li> <li>3. Removal of wording and amendments to wording in Table 5.1</li> <li>4. Additional wording relating to N2 road safety</li> <li>5. Recommendation on clarification of the RSES as the Eastern Midlands RSES, where applicable.</li> <li>6. Avoidance of abbreviations unless defined in a glossary or earlier in chapter.</li> <li>7. Asks that consideration is given to making the bullets point in Section 5.5.1 into policies (p155)</li> <li>8. Revision of footnotes in Chp 5 to reflect Ministerial Direction in Jan 2020.</li> <li>9. Apply consistency when referring to European Sites/Natura 2000 sites</li> <li>10. Updating and clarification of Map 5.2 to include road schemes</li> <li>11. Consider reviewing the necessity of Objective 10.5.1 of the Draft Plan.</li> <li>12. Update Map 5.2 to reflect schemes including the N2 Rath Roundabout to Kilmoon Cross, N52 Grange to Clontail and N51 Tullaghstown Improvements,</li> <li>13. Consider including Dunboyne and Environs Transport Study as an Appendix</li> <li>14. Support inclusion of an objective to support the N3 Virginia By-pass</li> <li>15. Include the Ratoath Outer Relief Road in the Book of Maps</li> </ol>	
<b>Chief Executive's Response</b>	
<p>This submission provides clarification for the wording and description of schemes in Chapter 5 Movement Strategy and the associated maps in Chapter 5.</p> <ol style="list-style-type: none"> <li>1. It is acknowledged that the paragraph detailing the AA process outlined in MOV OBJ 33, MOV OBJ 36, SLN OBJ 7 and MOV OBJ 43 usurps the role and function of development management. Development of the aforementioned project will be subject to the outcome of the Environmental Impact Assessment and the Appropriate Assessment process. As such, the wording of the above objectives can be amended to remove the text relating to the AA process as this is inherent in the carrying out of AA.</li> <li>2. The Slane By-pass is listed a critical infrastructure in Table 5.1 of Chapter 5 of the Draft CDP and has yet to undergo the planning process. In the absence of planning approval for By-pass, it is considered premature to include proposed roads in the Book of Maps.</li> <li>3. Noted and will be amended</li> <li>4. Noted and further text has been incorporated into this section.</li> <li>5. Where referring to the Eastern Midlands Regional Spatial and Economic Strategy (EMRA RSES) as opposed to general Regional Spatial and Economic Strategy (RSES), abbreviation will now be changed to EMRA RSES.</li> <li>6. All abbreviations reference is defined when first referenced in Chapter 5.</li> <li>7. The bullet points outlined in Section 5.5.1 are derived from the NTA Transport Strategy for the Greater Dublin Area. MOV POL 12 aims <i>'To support the implementation of recommendations presented in the NTA's Transport Strategy for the Greater Dublin Area 2016-2035 and any subsequent reviews thereof.'</i> It is considered that this policy ensures</li> </ol>	

the bullets points listed in Section 5.5.1 are given effect.

8. Following the publication of the Ministerial Direction in January 2020 on the Eastern Midlands Regional Spatial and Economic Strategy, ED OBJ 24, R1 Rail Corridor of the Zoning Table p439, MOV POL 5 will be updated and footnote 12, 20 and 27 can be removed. Please refer to Submission MH-C5-60 from the Eastern Midlands Regional Assembly.
9. It is agreed that where appropriate, European Sites/Natura 2000 sites will be more consistently be referred to as European Sites in accordance with the Planning and Development Regulations 2001 (as amended)
10. In the absence of planning approval for the aforementioned projects, it would be considered premature to include this scheme in Map 5.2 of the Draft Plan.
11. With regard to Objective 2 in Section 10.5.1, the Draft Plan refers to a number of national guidelines, Strategies and Action Plans within its policies and objectives which it proposes to facilitate as part the Draft County Development Plan, it is considered that Objective 2, which re-states Objective CS OBJ 13 is an appropriate objective in the Draft Plan. Therefore, no change is recommended.
12. As outlined above, In the absence of planning approval for the aforementioned projects, it would be considered premature to include this scheme in Map 5.2 of the Draft Plan.
13. It is not considered necessary to attach the Dunboyne Environs as an Appendix to the Draft Plan. Given the number of strategic local documents that have informed the Draft Plan, it would impractical to attach all referenced documentation. However, the Transportation Study for Dunboyne / Pace will be published on the Meath County Council website and made available for public viewing and DCE OBJ 22 of the Written Statement supports and facilities the delivery of the transportation measures outlined in the Dunboyne and Environs Transportation Study. All relevant infrastructure interventions detailed in the aforementioned Transportation Study that must happen in conjunction and parallel with adjoining development on zoned lands, shall be considered and detailed in the Local Area Plan for the Dunboyne / Pace environs.
14. As per the recommendations of this submission and the submission from Cavan County Council, it is considered that a supportive objective for the N3 Virginia By-pass should be incorporated in the Draft Plan.
15. The recommendation to reflect the location of the Ratoath Outer Relief Road is supported and Map 33(a) will be amended.

#### **Chief Executive's Recommendation**

The following amendments are proposed to Chapter 5 Movement Strategy of the Draft Plan.

1. Amend MOV OBJ 33, MOV OBJ 36, SLN OBJ 7 and MOV OBJ 43 as follows:

##### **MOV OBJ 33:**

To support and facilitate the delivery of the bypassing of Slane, which is considered to comprise essential infrastructural development and to construct same subject to obtaining the relevant development consents required and to reserve and protect route option corridors from development which would interfere with the provision of the project. Development of the project will be subject to the outcome of the Appropriate Assessment process. ~~Where adverse effects on European site integrity are identified, alternative routes or designs will be developed to ensure that the project will not adversely affect the integrity of any European Site(s), the project will not be progressed unless and alternative solution can be implemented which avoids/reduces the impact to a level that the integrity of the European Site(s) is (are) unaffected.~~

##### **MOV OBJ 36**

To facilitate the delivery of all of the roads projects outlined in the National Development Plan 2018-2027 and National Transport Authority's Transport Strategy for the GDA 2016-2035, in

conjunction with the NTA, TII, Department of Transport, Tourism and Sport and other stakeholders. Development of these road projects will be subject to the outcome of the Appropriate Assessment process. ~~Where adverse effects on European site integrity are identified, alternative routes or designs will be developed to ensure that the project will not adversely affect the integrity of any European Site(s), either alone or in combination with any other projects. If despite the implementation of mitigation measures, there remains a risk that the proposals will adversely affect the integrity of any European Site(s), the project will not be progressed unless an alternative solution can be implemented which avoids/reduces the impact to a level that the integrity of the European Site(s) is (are) unaffected.~~

#### SLN OBJ 7

To support and facilitate the delivery of an N2 Bypass for Slane which is considered to comprise important infrastructural development and to construct same subject to obtaining the relevant development consents required and to preserve and protect route option corridors from development which would interfere with the provision of the project. Development of the project will be subject to the outcome of the Appropriate Assessment process. ~~Where adverse effects on European sites are identified, alternative routes or designs will be developed to ensure that the project will not adversely affect the integrity of any European Sites, either alone or in combination with any other plans or projects. If, despite the implementation of mitigation measures, there remains a risk that the proposal will adversely affect the integrity of any European Site(s), the project will not be progressed unless an alternative solution can be implemented which avoids/reduces the impact to a level that the integrity of the European Site(s) is (are) unaffected.~~

#### MOV OBJ 43

To support essential public road infrastructure including, bypasses of local towns and villages and proposed national road schemes and where necessary reserve the corridors of any such proposed routes free of development, which would interfere with the provision of such proposals. Such road schemes include those specified in the non-exhaustive list in Table 5.1: Each of these projects will subject to the outcome of the Appropriate Assessment process. ~~Where adverse effects on European site integrity are identified, alternative routes or designs will be developed to ensure that the project will not adversely affect the integrity of any European Site(s), either alone or in combination with any other projects. If despite the implementation of mitigation measures, there remains a risk that the proposals will adversely affect the integrity of any European Site(s), the project will not be progressed unless an alternative solution can be implemented which avoids/reduces the impact to a level that the integrity of the European Site(s) is (are) unaffected.~~

Delete SLN OBJ 10 of the Slane Written Statement as follows:

#### SLN OBJ 10

~~To investigate the effectiveness of, and if appropriate, progress the implementation of traffic management options, including the removal of non local heavy good vehicles for the N2 through Slane Village, in conjunction with the TII and other relevant authorities with a view to providing an enhanced and safer environment for the village.~~

3. Amend Table 5.1 as follows:

**Scheme Name****Description of Works**

Slane By-pass (N2)

To deliver key strategic infrastructure including Slane Bypass incorporating new bridge over the River Boyne.

~~Enhancements of the N2/M2 national route inclusive of a bypass of Slane, to provide for additional capacity on the non-motorway sections of this route, and to address safety issues in Slane village associated with, in particular, heavy goods vehicles.~~

~~To continue to support and facilitate TII, Fingal County Council, Louth County Council and Monaghan County Council in the planning and delivery of upgrades of the N2 as appropriate.~~

N2 Rath Roundabout to Kilmoon Cross

Improvements of road and junctions to address current capacity constraints.

~~M1 Motorway~~

M1 Junction 9 Drogheda (M1 South Junction)

Possible upgrading of this junction to improve capacity.

M1 Junction 8 Duleek

Possible upgrading of this junction to improve capacity.

M1 Junction 7 Julianstown/Stamullen

Upgrading of this junction to improve capacity inclusive of the facilitation of

### **~~M3 Motorway~~**

M3 Junction 4 Clonee

vehicular access to / from Stamullen via the City North Business Campus to the M1 Interchange.

Possible upgrading of this junction to improve capacity.

### **N51 Tullaghanstown**

### **Improvement of the National Secondary Route**

4. Amend Section 5.8.1 in the first sentence of the last paragraph as follows:

There is agreement that the potential safety risks that affect the future well-being of all road users and communities, particularly the Slane community must be addressed. **There are numerous road safety problems associated with the existing N2, particularly on the section which runs across the Slane Bridge and through Slane Village. These problems include substandard vertical and horizontal alignment, including steep gradients on the approaches to Slane Bridge and the N2/N51 crossroads junction, sharp bends, one-way shuttle traffic across Slane Bridge, tight turning radii at the N2/N5 junction, particularly for Heavy Goods Vehicles (HGV's) and reduced forward visibility and junction visibility.**

**High volumes of HGV's cause traffic congestion, delays and nuisance for residents and visitors to the village, posing significant ongoing road safety risks for all road users.**

**Meath County Council and Transport Infrastructure Ireland have long recognised these significant road safety issues. The installation of interim road safety measures in 2002 improved some of the safety issues but the inherent safety problems continue to exist on the substandard N2 alignment and by effect, so too does the risk of serious collisions for both road users and residents.**

In seeking a solution, the Council recognises that a balance must be achieved between environmental, historical and archaeological considerations and the safety and other negative impacts caused by the current traffic situation in Slane village.

5. Amend p.150 Movement Strategy as follows:

### **Eastern and Midlands Regional Spatial and Economic Strategy, 2019-2031**

Regional Policy Objective RPO 6 Integrated Transport and Land Use Planning seeks to: *'Promote best use of Transport Infrastructure, existing and planned, and promote sustainable and active modes of travel to ensure the proper integration of transportation and land use planning.'*

The **Eastern and Midlands Regional Spatial and Economic Strategy (EMRA RSES)** acknowledges that transport as a sector is one of the significant contributors to our national Green House Gas (GHG) emissions and as a nation we need to act on climate change and adapt and mitigate all sectors accordingly.

Amend p156 Movement Strategy, first paragraph as follows:

the absence of appropriate levels of investment, targeted economic growth could be undermined by increased levels of congestion which results in a loss of efficiency and negatively affects community life. All transport investment therefore must be focused and prioritised to secure the most advantageous outcomes with the focus, as outlined in the NPF, **EMRA RSES** and the NTA Transport Strategy, on improved accessibility within urban areas and on strategic regional routes and corridors.

Amend p157 Movement Strategy, Section 5.7.1 Rail, paragraph two as follows:

The provision of a rail line from Pace (M3 Parkway) to Navan remains a key objective of the Local Authority in order to facilitate the development of the key town as designated in the **EMRA** RSES in the County. This was supported in the **EMRA** RSES which included an objective ‘to support the delivery of a number of rail projects including the implementation of the extension of the Dunboyne/M3 Parkway line to Navan during the Mid Term Review of the GDA Transport Strategy.’

Amend p158 Movement Strategy as follows:

It is further noted that recent support delivered to the project by the **EMRA** RSES, supported strongly by MCC significantly improves future prospects of delivery of this key infrastructure for County Meath and the designated Key Town of Navan.

It is the policy of the Council: **MOV POL 5** *To actively pursue in conjunction with Irish Rail the implementation of the extension of the Dunboyne/M3 Parkway line to Navan during the Mid Term Review of the GDA Transport Strategy in accordance with the precepts of the **EMRA** RSES.*<sup>12</sup>

Amend p165, last paragraph as follows:

The **EMRA** RSES recognises that there is potential for a coast to coast network of national greenways, including the Royal and Grand Canals...

Amend p166, second paragraph, last sentence as follows:

The **EMRA** RSES includes an objective to support the extension of the Boyne Greenway to include Navan to promote sustainable transport choices and as a recreation asset for the town.

Amend p168, 5.8.1 Slane Bypass, first paragraph, last sentence as follows:

A bypass for Slane has been a long-standing objective of the Council and has the support of the majority of the local residents, who have campaigned for its construction for many years. The bypass is noted within the National Development Plan 2018-2027 as key infrastructure ‘investment to support the ambition for development of the border region’ and is identified as a priority for delivery<sup>20</sup>. Further, the **EMRA** RSES (RPO 8.10 of the Strategy refers) supports the appraisal and delivery of the N2 Slane Bypass.

Amend p169, Movement Strategy, Section 5.8.2 Leinster Outer Orbital Route as follows:

The **EMRA** RSES indicates that long term protection shall remain for the outer orbital route (Leinster Outer Orbital Route) extending from Drogheda to the Naas/Newbridge area with intermediate links to Navan and other towns.

Amend p170, Section 5.9.1 National Roads, first paragraph as follows:

The **EMRA** RSES recognises the importance of maintaining, improving and protecting the strategic function of the key transport corridors including the imperative to improve and protect the strategic function of the Dublin to Belfast International road corridor, which forms part of the TEN-T core network.

6. Amend the following to clarify abbreviations:

RPO - Amend p150 as follows: **Eastern Midlands** Regional Spatial and Economic Strategy, 2019-2031

Regional Policy Objective (RPO) 6 Integrated Transport and Land Use Planning seeks to: ‘Promote best use of Transport Infrastructure, existing and planned, and promote sustainable and active modes of travel to ensure the proper integration of transportation and land use planning.’

NTA – Full title of abbreviation under Section 5.2 Statutory Context.

ERM – Name of Consultants who undertook Public Safety Zone Report. No change required.

TEN-T – Amend Section 5.9.1 National Roads as following: The **EMRA** RSES recognises the importance of maintaining, improving and protecting the strategic function of the key transport corridors including the imperative to improve and protect the strategic function of the Dublin to Belfast International road corridor, which forms part of the **Trans-European Transport Network** (TEN-T) core network.

GDA – Amend p171 Movement Strategy as follows: The NTA's Transport Strategy for the **Greater Dublin Area (GDA)** 2016- 2026 includes provision to further develop and enhance the national road network including the delivery of the following projects relevant to the County:

7. No Change Recommended.

8. Please refer to Submission from the Office of the Public Regulator (MH-C5-816) Remove footnote 12, 20 and 27.

9. Amend Footnote 14 as follows: The National Roads Authority (NRA) ~~was~~ is the state body responsible for the national road network ~~and The NRA was established as part of the Roads Act 1993, and commencing operations on 23 December 1993 in accordance with S.I. 407 of 1993. The NRA merged with the Railway Procurement Agency and was effectively dissolved on 1 August 2015. The merger of the two agencies is called Transport Infrastructure Ireland (TII).~~

10. No Change Recommended.

11. To ensure consistency, it is recommended the Draft Plan replace reference to 'Natura 2000 sites' with 'European Sites' in accordance with their referencing in the Planning and Development Regulations 2001 (as amended) and to ensure consistency and clarity throughout the Plan. This applies to the following sections, objectives and policies within the Draft Plan:

- Chapter 1 – Section 1.2.2 Strategic Flood Risk Assessment
- Chapter 4 - ED POL 58
- Chapter 6 - INF OBJ 22
- Chapter 6 - INF OBJ 45
- Chapter 6 - INF POL 52
- Chapter 6 - INF OBJ 50
- Chapter 7 - SOC POL 39
- 8.9.1 Protecting Biodiversity in Meath – Sites Designated for Nature Conservation
- Chapter 8 - HER OBJ 32
- Chapter 9 - RUR OBJ 12
- Chapter 9 - RUR POL 31
- Chapter 11 - 11.3.2 Appropriate Assessment
- Chapter 11 DM OBJ 130
- Chapter 11 DM OBJ 132

12. No Change Recommended.

14. As per the recommendations of this submission and the submission from Cavan County Council, the following objective will be incorporated in the Draft Plan.

***MOV OBJ 49 To work in conjunction with Cavan County Council in the planning and delivery of the N3 Virginia Bypass Scheme located within the administrative area of Meath County Council.***

15. Amend Map 33(a) to reflect the location of the Ratoath Outer Relief Road.

<b>Submission No.:</b>	MH-C5-967
<b>Submitted by:</b>	Patrick O'Brien on behalf of Duleek and District Environmental Group
<b>Submission Theme(s):</b>	Infrastructure & Services for Duleek
<b>Summary of Submission:</b>	
<p>This submission requests a number of items to be included and provided for in the new CDP including;</p> <ol style="list-style-type: none"> <li>1. Duleek By-Pass</li> <li>2. Recycling Centre</li> <li>3. New Public Path</li> </ol>	
<b>Chief Executive's Response</b>	
<ol style="list-style-type: none"> <li>1. The accessibility of Duleek has been a significant influencing factor regarding employment and business operations in the town and environs with proximity to junctions 8 and 9 of the M1.  The R150 travels through the town centre resulting in significant volumes of traffic. In the longer term there is a need to divert heavy traffic from the town centre with a new bypass link to the southwest a possible option. The provision of a bypass is addressed under DUL OBJ 6 <i>'To examine the feasibility and progress the provision of the R150 bypass for Duleek to the south west of the town.'</i></li> <li>2. The provision of recycling centres is covered under INF OBJ 62 which is a high level objective providing for the identification of suitable sites for additional recycling centres and bring bank facilities.</li> <li>3. Enhanced traffic calming / traffic management proposals have been prepared to improve the quality and experience of the public realm in the short term and these shall be implemented during the lifetime of this Plan</li> </ol>	
<b>Chief Executive's Recommendation</b>	
No change recommended.	

<b>Submission No.:</b>	MH-C5-975 MH-C5-249 Michael Bray
<b>Submitted by:</b>	Flexibus Local Link Louth Meath Fingal
<b>Submission Theme(s):</b>	Chapter 5 Movement Strategy, Chapter 9 Rural Development Strategy
<b>Summary of Submission:</b>	
This submission makes the following recommendations;	



1. Update the information in Section 5.7.2 of the Chapter 5 to reflect the increase frequency of local bus services as a result of Flexibus and rebranded name.
2. That local authorities encourage investment in the expansion of this rural bus service and outline this support in the Rural Development Strategy chapter of the CDP.
3. That expansion of EV charging points take place in each village and town in Co. Meath
4. That the Draft Plan should be presented in a more reader friendly manner for stakeholders

#### Chief Executive's Response

1. The Council is strongly committed to the promotion of sustainable means of travel, including public bus services and the encouragement of modal change from private car to such sustainable means of travel. The points raised in this submission are noted and the information provided in Section 5.7.2 of the Draft Plan will be updated to reflect the new branding and increased operations.
2. The Council recognises the invaluable contribution of the Local link service to the public transportation network and the increase in local bus services as a result of this service, particularly to rural communities. This service can make a valuable contribution as a transport link for the network. The CE notes the support for MOV POL 11 of the Draft Plan and lack of Park & Ride facilities in County Meath. The Draft Plan contains a number of supporting policies and objectives for the provision of Park and Ride facilities, these objectives being MOV POL 10, MOV POL 13, MOV POL 14, MOV OBJ 15, MOV OBJ 16 and MOV OBJ 17. Objectives in relation to park & Rides can also be found within Written Statements of the Draft Plan. It should be noted that the NTA set up a specific office in 2020 to undertake feasibility studies to provide for Park and Ride facilities at appropriate locations in the Greater Dublin Area including County Meath. No change required.
3. The Chief Executive notes the support for MOV OBJ 24 in relation to EV charging points. The expansion of EV charging points is also supported by MOV OBJ 23 and MOV POL 16 in the Draft Plan. Therefore, no change is required.
4. The Chief Executive notes the comment raised in relation to the readability and difficulty in navigating the Draft Plan. The Draft Plan is undergoing changes in relation to the structure of the Document. It is expected that these changes will improve the overall structure of the document to make final Plan more reader friendly.

1. Amend Section 5.7.2 of the Draft Plan as follows:

There has been an increased frequency of local bus services largely as a result of the establishment of **Flexibus Local Link Louth Meath Fingal Flexibus, Meath Accessible Transport Ltd.** ~~13 Flexibus Local Link~~ run a daily routes between **Kilskyre, Crossakiel to Kells, Killyon, Ballivor, Kildalkey to Trim, Athboy to Navan, Nobber, Carlanstown to Kells and Navan, Ashbourne to Balbriggan and Stamullen to Balbriggan.** These regular public services can ~~Trim and Navan to~~ assist passengers who wish to access education, training or employment. Regular weekly services run between a number of towns and villages to increase community activity. Access to hospital and health services are available from a number of centres. Evening services are available in some towns and villages to reduce isolation and improve linkages between towns, village and their hinterlands. Regular weekly services run between a number of towns and villages while Dial A Ride services are available from a number of centres. The improvement in public transport between larger towns and between villages and towns is of paramount importance to reduce isolation and improve linkages between the towns, villages and their hinterlands.

Amend MOV POL 11: To **support and** facilitate in conjunction with relevant statutory agencies alternative transport modes to the private car, including enhanced delivery of public transport services along regional corridors (as defined in the NTA's Transport Strategy for the Greater Dublin Area 2016-2035); frequent local bus services linking residential areas to District Centres and Town Centres, and which also serve shopping areas, employment areas and other activity centres, and connecting to key transport interchange points.

<b>Submission No.:</b>	MH-C5-977
<b>Submitted by:</b>	Gerard Murphy
<b>Submission Theme(s):</b>	Chapter 5 Movement Strategy, Chapter 8 Cultural and Natural Heritage Strategy
<b>Summary of Submission:</b>	
<p>This submission supports the commitment for a rail project but submits that the reservation of lands should extend north of Navan to Kells, Virginia and Cavan. This submission outlines the following issues and recommendations:</p> <ol style="list-style-type: none"> <li>1. Suggests the reservation of a pathway for a railway and station along the Kells bypass.</li> <li>2. Requests traffic calming measures on the Cavan road in Kells to counteract speeding in the area</li> <li>3. Opposes the Greenway along the rail line which commences from the Tara Mines junction</li> <li>4. Strongly recommends the preservation and upkeep of the Navan Drogheda line for passenger services in the future which should instead be used as passenger trains. Supports the building of a branch line to Ratoath and Ashbourne so feel no consideration was given to re-opening the branch from Kilmessan to Trim or the Hill of Down Station.</li> <li>5. Submits that the HSE are not in support of the North East Regional Hospital site and see Drogheda as the regional hospital.</li> <li>6. Identifies littering along the N52 bypass as a major problem</li> </ol>	
<b>Chief Executive's Response</b>	
<ol style="list-style-type: none"> <li>1. The reservation of lands for a rail line and station along the Kells By-pass is not currently supported at a national and regional level. Pending an overarching strategic objective, it would be premature to reserve lands for this purpose. It is the more immediate priority of Meath County Council to extend the rail line to Navan.</li> <li>2. There is a high-level policy in relation to traffic calming, specifically MOV OBJ 40 which aims to 'To implement a programme of traffic and parking management measures in towns and villages throughout the County, as resources permit.' More detailed objectives in relation to the issue raised can be dealt with as part of preparation of the Kells LAP.</li> <li>3. The greenway along the rail line was subject to a Part 8 Application in 2013 and approved. The project has since been received the necessary funding and is due to commence during the lifetime of this Plan.</li> <li>4. As with the reservation of lands for a railway and station, it would be premature to include an objective for the preservation of the Navan Drogheda line, or re-opening the branch from Kilmessan to Trim or the Hill of Down Station pending a national or regional strategic objective.</li> <li>5. The funding and identification of suitable hospital locations are the outside the remit of the County Development Plan.</li> <li>6. The presence of litter and illegal dumping is acknowledged. In response to this, Meath County Council have developed an Anti-litter Initiative which runs every year in March and April. This initiative provides grants to high scoring towns to encourage participation and supplies start-up packs to groups who are involved. Litter Fines can be imposed ranging from €150 or a fines</li> </ol>	

of up to €4,000 and Meath County Council have also developed a Litter Management Plan 2019-2021 with the objective of litter education, litter prevention and litter enforcement. It is hoped that these plans will serve to reduce littering and dumping around Co. Meath.

**Chief Executive's Recommendation**

No Change Recommended

<b>Submission No.:</b>	MH-C5-1101
<b>Submitted by:</b>	Evan Newell
<b>Submission Theme(s):</b>	Chapter 5 Movement Strategy
<b>Summary of Submission:</b>	
<p>This submission relates to the provision of Service Station Facilities near Dunshaughlin. The author of the submission has noted a significant number of vehicles that stop or park throughout the day on leaving the M3 Motorway at Junction 6 (Dunshaughlin). The reasons given in this case range from checking emails, to having lunch. It is submitted that the parking of these vehicles is hazardous to pedestrians and joggers and that this area should be considered a suitable location for a Service Station.</p>	
<b>Chief Executive's Response</b>	
<p>The proposal for a Service Station at Junction 6 was subject of a planning application in 2016. This was granted by MCC and subsequently refused by An Bord Pleanála in 2017 by reason that the area was not zoned as a suitable location in the NRA Service Area Policy and was located near an area identified by TII for an online service area between Junction 4-7. It was also determined to be contrary to the 'Spatial Planning and National Roads Guidelines for Planning Authorities' issued by the Department of the Environment, Community and Local Government which seek to avoid the attraction of short, local trips or to permit a service area becoming a destination for local customers. For this reason, Meath County Council cannot support the proposal by means of a policy or objective given its conflict with national guidelines.</p>	
<b>Chief Executive's Recommendation</b>	
No Change Recommended	

# Chapter 6

## Infrastructure Strategy

<b>Submission No.:</b>	MH-C5-89
<b>Submitted by:</b>	Irish Wind Energy Association (IWEA)
<b>Submission Theme(s):</b>	Chapter 6 Infrastructure Strategy
<b>Summary of Submission:</b>	
<p>This submission from IWEA provides several recommendations for the transition to clean renewables through the development of wind energy. A summary of the key issues is outlined below.</p> <ol style="list-style-type: none"> <li>1. The Council have not attempted to develop a Wind Energy Strategy for the County, and while Policy INF POL 41 of the draft is to promote wind energy “having regard to the provisions of the Landscape Characterisation Assessment of the County”. The Landscape Character Assessment which was originally developed for the 2013 - 2019 CDP is negative to neutral at best in relation to the development of wind energy projects within the County.</li> <li>2. MCC has a responsibility to ensure that they play a part in contributing to our national renewable energy targets and should make every effort to develop a wind energy strategy for Co. Meath which does not constrain any areas which may have wind generation potential.</li> <li>3. One of the key objectives of the RSES is to support renewable energy opportunities by harnessing natural resources that will support decarbonisation, energy security, and allow the region to take advantage of the economic benefits of greener energy. IWEA believe that the development of a wind energy strategy for County Meath should be an absolute priority to be consistent with the RSES and that the omission of one will be contrary to the PDA 200 (as amended).</li> <li>4. Specific Planning Policy Requirement (SPPR) 1 of the draft Wind Energy Guidelines is proposed to be a binding requirement and outlines measures that planning authorities are to take including indicating how the relevant plan will contribute to realising overall national targets for climate change mitigation, wind energy production, and the potential wind energy resource. MCC will have to take account of the objectives outlined above in full once finalised and develop a spatial Wind Energy Strategy for the County. The submission asks the Council to address this requirement now.</li> <li>5. In relation to landscape, we are asking MCC and all Local Authorities to develop consistent Landscape Character Assessment (LCA) criteria and apply it across all Counties. We ask that a ‘Low’, ‘Medium’, and ‘High’ weighting table for landscape sensitivity types be considered for renewable energy development potential. We urge MCC to update the 2013-2019 Landscape Characterisation Assessment.</li> <li>6. The submission points out that turbines have been developed which can yield the same energy from lower wind sites than their older counter parts and recommends that MCC and all Local Authorities not use the SEAI Wind Atlas or any similar general wind resource data as a constraint when developing and zoning areas for renewable energy development. Also, grid constraints should not be considered by Local Authorities when preparing renewable energy strategies.</li> </ol>	
<b>Chief Executive’s Response</b>	
<ol style="list-style-type: none"> <li>1. The Chief Executive notes the comments relating to the current Landscape Character Assessment 2013-2019 for County Meath. It should be noted that it is the intention of the Planning Authority to carry out a Landscape Character Assessment for County Meath during the lifetime of the Development Plan which be incorporated by way of a variation. In the meantime, wind energy development must have regard to the provisions of the</li> </ol>	

existing Landscape Characterisation Assessment and existing Wind Energy Guidelines of the Department Housing Planning and Local Government.

2. Meath County Council will continue to support and encourage the principle of development of wind energy, in accordance with Government policy and having regard to the provisions of the Landscape Characterisation Assessment of the County and the Wind Energy Development Guidelines (2006). It is noted the most up-to-date Government guidance on this matter remain the 'Wind Energy Developments Guidelines for Planning Authorities, 2006'. In December 2019, the DoHPLG published a draft Revised Wind Energy Development Guidelines, for which the responses will inform the final Guidelines. To date, given that the Department has not finalised its targeted review of the current guidelines, the current guidelines remain in full effect, and the Planning Authority must be consistent with the standards set out in same.

Having regard to the above, it will be an objective of the Council to prepare a Renewable Energy Development Strategy, and to publish same as a variation of the CDP, following the completion of the Departments review of the above Guidelines.

3. As noted above. Meath County Council are committed to the preparation of a Renewable Energy Strategy and consistency with the RSES to identify Strategic Energy Zones is reflected in INF POL 42 of the Draft Plan. Following the completion of the Departments review of the above Guidelines, it will be objective of the Council to prepare a Renewable Energy Development Strategy, and to publish same as a variation of the plan.
4. The Chief Executive notes Specific Planning Policy Requirement (SPPR) 1 of the draft Wind Energy Guidelines and its requirement to outline how the relevant plan will contribute to realising overall national targets for climate change mitigation, wind energy production, and the potential wind energy resource. MCC will take account of this requirement during the preparation of the Renewable Energy Strategy and ensure this is addressed in the Development Plan by way of variation.
5. The recommendations in relation to developing a standardized LCA criteria is noted and will be considered in greater detail during the preparation of the Landscape Character Assessment.
6. Comments relating to the advancement of wind turbine criteria rendering the SEAI Wind Atlas are noted and it will be noted in the preparation of the Renewable Energy Strategy the Wind Atlas should form part of the criteria factored into account when developing a Site Suitability Map for the County. It is also agreed that grid constraints are not an issue for Local Authorities when zoning areas for renewable energy.

#### **Chief Executive's Recommendation**

No Change Recommended.

<b>Submission No.:</b>	MH-C5-102
<b>Submitted by:</b>	Martin Cromb
<b>Submission Theme(s):</b>	Chapter 6 Infrastructure Strategy
<b>Summary of Submission:</b>	
This submission recommends the inclusion of a range of measures in relation to flood prevention	

and management. The core recommendations can be summarised as follows:

- Regular inspection and maintenance of existing and new flood prevention systems in place.
- Timely responses to issues of flooding reported by members of the public.
- Action plan provided to public for areas where flooding occurs.

#### Chief Executive's Response

Flood Prevention is a matter for the Office of public Works. In emergency flooding situations, Meath County Council have a Major Emergency Plan and Severe Weather Emergencies Sub-Plan to facilitate the response to, and recovery from, major emergencies by Meath County Council and ensure that the Council's arrangements are co-ordinated with those of the other two designated Principal Response Agencies, the Health Service Executive and An Garda Síochána.

As such, the above recommendations are dealt with by Meath Council and are not a matter for the County Development Plan.

#### Chief Executive's Recommendation

No Change Recommended.

<b>Submission No.:</b>	MH-C5-105
<b>Submitted by:</b>	Open Eir
<b>Submission Theme(s):</b>	Infrastructure Strategy
<b>Summary of Submission:</b>	
<p>This submission relates to the provision of telecommunications infrastructure in Meath and has the following comments:</p> <ol style="list-style-type: none"> <li>1. With regard Section 6.16.3 which proposes to promote the attractiveness of regional locations outside of the main urban centres for economic development both indigenous and FDI, the submission has highlighted that many regional locations throughout County Meath enjoy broadband speeds of up to 1Gbps which should be harnessed for education, business and remote working.</li> <li>2. "INF POL 55 states the following <i>'To seek to have appropriate modern ICT, including open access fibre connections in all new developments and a multiplicity of carrier neutral ducting installed during significant public infrastructure works such as roads, rail, water and sewerage, where feasible'</i>"</li> </ol> <p>The submission supports INF POL 55 and the availability of carrier neutral ducting though highlights that careful construction is required to ensure provision and service provision and continuity happens in an orderly and planned manner to prevent numerous operators from placing cables and associated equipment in the infrastructure, thereby potentially impeding service roll-out.</p> <ol style="list-style-type: none"> <li>3. "INF OBJ 53 states the following <i>'To require that open access communications cables and associated infrastructure are undergrounded in urban areas with particular reference to Architectural Conservation Areas in order to protect the visual amenities of streetscapes.'</i>"</li> </ol> <p>The submission notes that though desirable, underground infrastructure is not all</p>	

practical and may not be economically feasible. The transfer of existing infrastructure is both costly and disruptive to businesses. The cost of transferring the infrastructure would need to be included in projects designed.

#### Chief Executive's Response

1. The presence of a high-speed broadband at regional locations is noted and a minor amendment to the first bullet point in Section 6.16.3 is recommended to reflect this.
2. Support of INF POL 55 is welcomed and concerns to ensure an orderly and planned approach to service provision of broadband is noted. In this regard, INF POL 55 will be amended.
3. It is acknowledged that it may not be appropriate in all circumstances to place all cables underground in Architectural Conservation Areas (ACA's) if suitable over ground alternatives are available. However, agreement of over ground works in ACA's will be subject to planning consent process with Meath County Council.

#### Chief Executive's Recommendation

1. To amend Section 6.16.3 as follows:  
Promote the attractiveness of **further** regional locations outside of the main urban centres for economic development both indigenous and FDI.
2. Amend INF POL 55 as follows: To seek to have appropriate modern ICT, including open access fibre connections in all new developments and a multiplicity of carrier neutral ducting installed during significant public infrastructure works such as roads, rail, water and sewerage, where feasible, **and in consultation with all relevant licensed telecommunications operators.**
3. Amend INF OBJ 53 as follows:  
To require that open access communications cables and associated infrastructure are undergrounded in urban areas with particular reference to Architectural Conservation Areas in order to protect the visual amenities of streetscapes." **Proposals for overground cables located within Architectural Conservation Areas will be subject to outcome of development management process.**

<b>Submission No.:</b>	MH-C5-229
<b>Submitted by:</b>	Cormac McCann, Broadband Officer Meath County Council
<b>Submission Theme(s):</b>	Chapter 6 Infrastructure Strategy
<b>Summary of Submission:</b>	
<p>This submission highlights the required changes to Section 6.2.3 of the Draft County Development Plan since the adoption of the National Broadband Plan. This includes specific responsibilities allocated to County Councils to support its delivery.</p> <p>A critical aspect of the National Broadband Plan is the development of Broadband Connection Points within existing and developing community facilities in the Intervention Areas. These facilities will enable local residents to access high speed broadband for leisure, economic, educational or work activities.</p>	



### Chief Executive's Response

The comments made in relation to Section 6.2.3 of the Draft Plan

It is considered that the proposed additional text provides a context for the role of the Council in the National Broadband Plan and its planned role out. It is agreed that the proposed text suggestion should be included in Section 6.2.3.

### Chief Executive's Recommendation

Amend Section 6.2.3 of the Draft Plan as follows;

“Broadband is one of the key drivers in maintaining competitiveness and supporting socio-economic development. It provides a connectivity that has transformed the way people and businesses operate.

The National Broadband Plan is the Government's plan to deliver high speed broadband services to all businesses, farms, and households in Ireland. It will ensure that people living and working in rural areas have the same digital opportunities as those in urban areas.

The contract for the National Broadband Plan State intervention area was awarded in November 2019. **The Council has been given specific responsibilities within the plan to supports its delivery.**

**A critical aspect of the National Broadband Plan is the development of Broadband Connection Points within existing and developing community facilities in the Intervention Areas. These facilities will enable local residents to access high speed broadband for leisure, economic, educational or work activities.**

**The WIFI4EU network, a publicly accessible free Wi-Fi service, is being delivered across Ireland in collaboration with the European Commission and the Department of Rural & Community Development. In Meath, residents and visitors are able to access high speed broadband in the main population centres of the County.**

The Council will seek to **support the delivery of these services and** promote enhancement of broadband delivery in County Meath in the period of the Development Plan in accordance with National policy in order to:

- Promote the attractiveness of regional locations outside of the main urban centres for economic development both indigenous and FDI;
- Facilitate more flexible **study and** working arrangements such as working from home **and working hubs**;
- Reduce social isolation.”

Submission No.:	MH-C5-259
Submitted by:	Martin Fagan
Submission Theme(s):	Chapter 6 Infrastructure
Summary of Submission:	

This submission relates to lands at Old Road, Athlumney, Navan currently zoned “A1 Existing Residential” in both the existing County Development Plan 2013 - 2019 and the draft County Development Plan 2020 – 2026.

The submission raises concerns about the Councils proposal to designate his lands “Flood Zone A/B Lands” in their Flood Risk Assessment and Management Plan (“the FRAMP”) carried as part of the preparation of the Draft Plan. It is submitted that the risk to flooding on the clients land has been artificially created by unauthorised development on adjacent lands. It is submitted that the FRAMP prepared on behalf of the Council fails to take into consideration the cause of the flooding or the proposed management of same.

The submission is accompanied by the SFRA outlining the cause of the flood risk is as a result of the access bridge to the Tubberclaire Meadows Estate and the works carried out as part of the construction of planning permission 01/5265 for the residential estate. The submission indicates the depth of the channel and works completed were not carried out in accordance with the requirement stipulated by Joseph O’Reilly Consulting Engineers in the application documentation which required a depth of 1.5 metres beneath the bridge.

It is stated that the flood risk on the above lands were further compounded by a Developer named Bridgedale Homes under Pl. Ref NA150645 who further breached planning by not acting in accordance with the Flood Risk Assessment.

The omission or neglect of Meath County Council to investigate and address the root cause of localised flooding in the vicinity of the Bailis Manor and Tubberclaire Meadows Estate is in direct contravention of the obligations imposed upon Meath County Council by both the NPS and the RSES which requires active land management to ensure that land and building resources within existing settlements are used to their full potential (extract from Page 43 of the draft RSES included ). To comply with their active land management obligation, Meath County Council needs to address the cause of the flooding ie: the access bridge to the Tubberclaire Meadows Estate and the amendments thereto that have been constructed in breach of successive planning permissions and in doing so discharge their statutory obligation and planning function.

#### **Chief Executive’s Response**

The concerns of the landowner relating to the above lands are noted. However, the County Development Plan is not the vehicle for the resolution of such an issue. It is noted that these lands are zoned A1 Existing Residential in both the current and Draft Plan. Notwithstanding this, the Author is advised to contact the Planning Enforcement Section of Meath County Council in relation to the issues raised where the matter will be investigated further. The County Development Plan is a high level strategic plan that does not cater for or deal with site specific issues. The drafting of the Navan Local Area Plan will offer some opportunity for further and more detailed consultation at the local level.

#### **Chief Executive’s Recommendation**

No Change Recommended.

<b>Submission No.:</b>	MH-C5-316
<b>Submitted by:</b>	Michael Gunn
<b>Submission Theme(s):</b>	General Comments to MCC CDP

### **Summary of Submission:**

The infrequent removal of materials legally deposited in local 'recycling centres' is a major issue and promotes littering, either at or away from the centres.

### **Rural Strategy**

It is incomprehensible that "residential development" is viewed to threaten" quarrying and extractive industries" in the county. This industry is unsustainable, are potentially causing major damage to local aquifers and the environment and are wrecking local roadways.

The concern for water quality due to household waste water from rural housing can easily be addressed by modern technology and treatment systems.

The unregulated quarrying and dumping activities in south Meath should be regularised immediately. The preferential treatment given to some citizens results in all citizens not being treated equally – despite the Irish Constitution.

### **Strategic Comments**

In general the section of the proposed plan has good aspirations however recognition of the failures of planning policies in the past are not identified.

SOC POL 6 To require that all new residential development applications of 50 units or more on zoned lands are accompanied by a Social Infrastructure Assessment (SIA) to determine if social and community facilities in the area are sufficient to provide for the needs of the future residents (of all age cohorts). This should include details regarding the following essential facilities: Playgrounds, parks and other green spaces, education, childcare, health and others such as shops, banks, post offices, community meeting rooms/centres and recreational facilities. The assessment should identify membership and non-membership facilities which allow access for all groups. Where deficiencies are identified, proposals will be required to accompany the Planning application to address the deficiency. In certain cases however, residential development under these thresholds may, at the discretion of the Planning Authority, require the submission of a SIA. (Please refer to Chapter 11 Development Management Standards for further information)

### **Comment**

This objective is admirable BUT 'fixing' social problems in housing estates in villages should be given priority in deprived housing estates that currently need community facilities. The aim to have community facilities for housing estates in the future is admirable. Consideration should be given to facilitation of sustainable dwellings outside conurbations to help reduce pressure on housing.

### **Chief Executive's Response**

1. Rural Strategy
2. In response to the strategic comments it is noted that the Council recognises that the provision of good quality community facilities in both existing and developing areas is a key element in the development of sustainable communities across the County. As part of the preparation of the Draft Plan, the Council has engaged with various sections of the Council in addition to external agencies to identify the community infrastructural needs required to assist in the creation of a more balanced and sustainable community. Through this process, it is considered that this Plan has identified sufficient social and community lands to meet the existing and future needs of the population during the life

of this Plan and for the establishment, improvement or expansion of all community facilities where required.

**Chief Executive's Recommendation**

No change recommended

**Submission No.:**

MH-C5- 394

**Submitted by:**

George O'Connor

**Submission Theme(s):**

Chapter 6 Infrastructure Strategy,

**Summary of Submission:**

This submission submits there is a lack of commitment towards developing a meaningful renewable or wind energy strategy. MCC need to be a more active player in the development of clean energy and reducing carbon and should share this responsibility with other Counties who are and have been facilitating wind energy developments for the past number of decades.

Meath Co. Co needs to produce within this draft plan a Renewable or Wind Energy Strategy for the County. Furthermore, the Landscape Characterisation Assessment which was developed as part of the 2013-2019 CDP is negative in respect wind energy development, however the Council have stated it will be a policy of the updated CDP to promote wind energy "having regard to the provisions of the Landscape Characterisation Assessment of the County". I believe that this currently conflicts with the National Planning Framework (NPF) and Climate Action Plan.

**Chief Executive's Response**

The most up-to-date Government guidance on this wind energy remain the '*Wind Energy Developments Guidelines for Planning Authorities, 2006*'. In December 2019, the DoHPLG published a draft Revised Wind Energy Development Guidelines, the responses of which will inform the final Guidelines. To date, given that the Department has not finalised its review of the current guidelines, these guidelines remain in full effect, and the Planning Authority must be consistent with the standards set out in same.

Having regard to the imminent publication of national guidelines, it would be premature to publish a Renewable Energy Strategy at this point. Publication of a Strategy at this stage would be likely to result in the revision and reconsideration of the Strategy once the revised Wind Energy Guidelines are published and it is considered that the Draft Plan has appropriate policies and an objective in place to manage wind energy developments in the county interim. Notwithstanding this, it will be an objective of the Council to prepare a Renewable Energy Development Strategy, and to publish same as a variation of the CDP, following the completion of the Departments review of the above Guidelines.

This is considered the most reasonable and balanced approach to managing future wind energy development proposals in the county whilst also complying with Government policy on the matter.

**Chief Executive's Recommendation**

No Change Recommended.

<b>Submission No.:</b>	MH-C5-430
<b>Submitted by:</b>	Eirgrid
<b>Submission Theme(s):</b>	Chapter 6 Infrastructure Strategy
<b>Summary of Submission:</b>	
<p>This submission has been lodged by Eirgrid, who develop, manage and operate the electricity transmission grid. The grid supplies power to industry and businesses that use large amounts of electricity and powers the distribution network. EirGrid supports policies and objectives included in Section 10.15.4 which provide for a safe, secure and reliable supply of electricity.</p> <p>The submission recommends that additional policies are required in the plan to ensure consistency and alignment between the National Marine Planning Framework and regional approaches to marine spatial planning. The Plan should support the sustainable development of Ireland's offshore renewable energy resources in accordance with the Department of Communications, Energy and Natural Resources 'Offshore Renewable Energy Development Plan' and any successor thereof including any associated domestic and international grid connection enhancements. Regional Policy Objective 10.24 of the RSES should be included in the forthcoming plan. While Meath has a limited coastline, connections to the national grid may be found in the county.</p> <p>In 10.5.8 Energy, EirGrid request reference and emphasis placed on the electricity transmission grid's importance in 'reducing demand and need for fossil fuels and increase uptake of renewable energies'</p> <p>In Section 10.6.2 Energy and Waste Infrastructure, 'reduction in the capacity of distribution and transmission lines in higher temperatures may reduce efficiency and increase costs' is identified as a key risk. However, there is no associated objective to reduce it. EirGrid would suggest simply deleting this risk as it is an operational matter for both the Transmission (EirGrid) and Distribution (ESB) System Operator or else inserting text similar to INF POL 46 which is addressing the risk.</p>	
<b>Chief Executive's Response</b>	
<p>Recognising that County Meath has a coastline of approximately 12 kilometres, it is agreed that the National Marine Planning Framework should be incorporated into Draft Plan. As per the recommendations and the RSES, the Draft Plan will also include reference to the Offshore Renewable Energy Development Plan and RPO 10.24 of the RSES.</p> <p>The Chief Executive recognises that the transmission grid is a critical piece of energy infrastructure. This is reflected in INF OBJ 51 which 'seeks the delivery of the necessary integration of transmission network requirements to facilitate linkages of renewable energy proposals to the electricity transmission grid in a sustainable and timely manner.' It would be appropriate to include this objective in the Table under 10.5.8 on Energy.</p> <p>It is agreed that reduced capacity and increased costs of distribution and transmission lines associated with higher temperatures are an operational issue and cannot be resolved by the Council. Accordingly, this statement will be removed from the Key Risks column under Section 10.6.2 Energy and Waste Infrastructure.</p>	
<b>Chief Executive's Recommendation</b>	
<p>Amend Chapter 6 Infrastructure Strategy, p202, 6.12 National Maritime Spatial Plan to <b>6.11.2 National Maritime Spatial Plan</b>. Add the following text under Section 6.11.2:</p> <p><b>6.11.3 National Marine Planning Framework (Draft)</b></p>	

The NMPF is a national plan for Ireland's maritime area, setting out, over a 20 year horizon, how we want to use, protect and enjoy our seas. The NMPF sits at the top of the hierarchy of plans and sectoral policies for the marine area. The plan has been informed by existing sectoral plans and will, in turn, be used to inform future cycles of those plans in an ongoing feedback loop. It provides a coherent framework in which those sectoral policies and objectives can be realised.

The marine plan will cover Ireland's maritime area, including internal waters (sea area), territorial seas, exclusive economic zone (EEZ) and continental shelf. The maritime area comprises approx. 490,000 km<sup>2</sup> and extends from mean high water mark at the coast seaward to in excess of 200 nautical miles in parts.

This draft NMPF contains the objectives, policies and supporting actions the Government considers necessary to support the effective management of marine activities and more sustainable use of our marine resources. It sets out the policy, legislative and regulatory context for Marine Spatial Planning in general and, more specifically, for the development of Ireland's first plan. Consideration of the objectives of the plan, once adopted, will form part of the decision-making process for marine developments and activities.

Amend INF POL 30: To implement the policies and objectives as set out within the National Maritime Spatial Plan **and on adoption, the National Marine Planning Framework** to realise the full benefits of our ocean wealth in a managed and sustainable way ensuring climate change is taken into account.

Amend Chapter 10 Infrastructure Strategy, p202, to include the following text:

Amend 6.15.2 Policy Context to include the following plan:

#### **Offshore Renewable Energy Development Plan 2014**

The Offshore Renewable Energy Development Plan sets out the context for the development of Ireland's offshore wind and ocean renewable energy sectors, and the current state of play with regard to the range of policy areas that must be coordinated in order to create the conditions necessary to support the development of these sectors. The Plan was subject to an interim review in 2018 which identified a list of challenges and proposed next steps required to implement the recommendations identified by the Oversight Group.

#### **Amend Section 6.15.3 Renewable Energy, last paragraph as follows;**

RPO 10.24 of the Eastern Midlands RSES sets out to support the sustainable development of Ireland's offshore renewable energy resources in accordance with the Department of Communications, Energy and Natural Resources 'Offshore Renewable Energy Development Plan' and any successor thereof including any associated domestic and international grid connection enhancements.

Remove from the Key Risks column under Section 10.6.2 Energy and Waste Infrastructure the following:

- ~~Reduction in the capacity of distribution and transmission lines in higher temperatures, may reduce efficiency and increase costs~~

<b>Submitted by:</b>	Dean Gargan
<b>Submission Theme(s):</b>	Chapter 5 Movement Strategy, Chapter 6 Infrastructure
<b>Summary of Submission:</b>	
<p>This submission raises two issues relating to roads and internet in Rathkenny.</p> <ol style="list-style-type: none"> <li>1. Road re-surfacing is required in Clogher road Rathkenny to fill the potholes.</li> <li>2. The roll out of Fibre Optic broadband came approx. 150 yards down Clogher road and stopped facilitating 5 occupants. There is at least 8 residential buildings with families whom would benefit substantially from this with approximately 50 metres on that road.</li> </ol>	
<b>Chief Executive's Response</b>	
<ol style="list-style-type: none"> <li>1. The maintenance and improvements of roads are supported in MOV OBJ 42 of the Draft Plan. It should be noted that road improvements, upgrades, realignments, repairs, traffic management measures, traffic calming and improvements to road signage are assessed and implemented as deemed necessary, as resources allow and subject to availability. The operations section of transportation and Municipal District and outdoor staff provide the key resources in terms of dealing with such issues.</li> <li>2. The roll out of Fibre Optic broadband is outside of the remit of the County Development Plan and is being undertaken as part of the National Broadband Plan overseen by the Department of Communications, Climate Action and Environment. Insofar as possible, Meath County Council will support the delivery and implementation of this Plan.</li> </ol>	
<b>Chief Executive's Recommendation</b>	
No change recommended.	

<b>Submission No.:</b>	MH-C5-514
<b>Submitted by:</b>	SIRO Ltd
<b>Submission Theme(s):</b>	Chapter 6 Infrastructure Strategy, Chapter 9 Cultural and Natural Heritage
<b>Summary of Submission:</b>	
<p>This submission has been lodged by SIRO Ltd., a fibre optic broadband provider which is deployed on ESB's existing overhead and underground infrastructure. The submission supports the Draft Plans recognition of broadband as a key driver in socio economic development but has the following comments in relation to the objectives outlined below.</p> <p>INF OBJ 53 requires open access network to underground infrastructure in urban and Architectural Conservation Areas. This may not always be possible if ducts are not available resulting in multiple road opening requirements and considerable expense.</p> <p>INF OBJ 53 also calls out Open Access Networks specifically and does not make any reference to operators that do not offer open access to their networks.</p>	
<b>Chief Executive's Response</b>	
<p>It is acknowledged that it may not be appropriate in all circumstances to place all cables underground in Architectural Conservation Areas (ACA's) if suitable over ground alternatives are available. However, agreement of over ground works in ACA's will be subject to planning consent process with Meath County Council.</p>	



**Chief Executive's Recommendation**

Amend INF OBJ 53 as follows:

To require that, open access communications cables and associated infrastructure are undergrounded in urban areas with particular reference to Architectural Conservation Areas in order to protect the visual amenities of streetscapes." **Proposals for overground cables located within Architectural Conservation Areas will be dealt with on a case by case basis and are subject to outcome of the developments management process.**

<b>Submission No.:</b>	MH-C5-561
<b>Submitted by:</b>	Linda Clare
<b>Submission Theme(s):</b>	Chapter 6 Infrastructure
<b>Summary of Submission:</b>	
This submission states that Meath Co. Council & Councillors have a duty of care to future home dwellers by not giving planning permission for construction on land which is on a flood Plain or land which has a propensity to flood.	
<b>Chief Executive's Response</b>	
<p>The Draft County Development Plan has been subject to a Strategic Flood Risk Assessment in accordance with the <i>Flood Risk Management Guidelines (2009)</i>. This identifies lands at risk of flooding and has informed the zoning of lands in the Draft Plan by zoning floodplains, wetlands and coastal areas which hold excess water as 'green infrastructure' which enhances opportunities for the creation of habitats which promote and protect flora and fauna and thus increase diversity. Vulnerable land uses such residential development will not be permitted on lands within floodplains.</p> <p>This is supported by a suite of policies and objectives in the Draft Plan - INF POL 18, INF POL 19, INF POL 20, INF OBJ 20, INF OBJ 21 refers.</p>	
<b>Chief Executive's Recommendation</b>	
No Change Recommended.	

<b>Submission No.:</b>	MH-C5-567
<b>Submitted by:</b>	Highfield Solar Limited (HSL)
<b>Submission Theme(s):</b>	Chapter 6 Infrastructure Strategy
<b>Summary of Submission:</b>	
<p>This submission relates to renewable energy for the county and makes the following comments in respect of the Draft Plan.</p> <ol style="list-style-type: none"><li>1. Section 6.15.3.2 Wind Energy should refer to national targets of 70% RES-E by 2030, put forward into the 2019 Climate Action Plan (CAP) and interim targets within the lifetime of this plan.</li><li>2. It is requested that the final draft include Solar PV Farms in the list under Section 6.15.3 Renewable Energy.</li><li>3. Request the development of Strategic Energy Zones within the county for renewable energy projects which will include suitable locations for solar farms. In this regard, HSL</li></ol>	

request that any identifications should not be overly restrictive on acceptable locations for solar farms.

4. The Climate Action Plan refers to co-location of solar farms with existing renewable energy generation projects as a method of maximising grid capacity, as solar farms may operate when wind energy cannot. Similarly, co-location of solar with large energy users such as data centres can serve to off-set energy requirements of such developments. It is requested that preference be given to locate solar PV farms, where acceptable, in areas with existing permitted developments to avail of grid capacity/grid infrastructure sharing opportunities. It is also requested that preference be given to location of solar PV farms in close proximity to existing or planned commercial and industrial sites (including data centres) for the provision of on-site energy.
5. It is requested that Solar Farms be permitted to be located with flood Zones A & B due to panning being 700mm above ground level subject to Flood Risk Assessments being carried out. It is instead requested the INF OBJ 28 and DM OBJ 147 is amended.
6. The submission highlights the biodiversity gains that can be achieved from changing from intensive agricultural lands to solar farms. In light of this, it is asked that an additional policy is added in Section 9.6 Agriculture to recognise the development of solar farms as a means of diversification of agricultural land.
7. HSL propose the removal of DM POL 38 in the absence of the publication of the Section 28 Guidelines due to concerns that this policy will delay granting of Solar Farms.

#### **Chief Executive's Response**

1. It is agreed that reference to the 2020 targets will be updated to reflected national targets for 2030 which is now more relevant to the period for the Draft Plan.
2. This is agreed and Section 6.15.3 will be amended to reflect the capacity of solar power to generate electricity.
3. As per INF POL 42 aims to support the identification, in conjunction with EMRA, of Strategic Energy Zones, areas suitable to accommodate large energy generating projects within the Eastern and Midlands Regional area. The identification of suitable sites will be identified in accordance with County Meath's commitment to support Irelands renewable energy targets while ensuring the principals of proper planning and sustainable development are maintained.
4. The Chief Executive acknowledges the benefits of co-location of solar farms with existing renewable energy generation projects and large energy users and will ensure that this is considered as part of the preparation of a Renewable Energy Strategy.
5. The Chief Executive agrees that solar panels are not particularly vulnerable to flooding but that the required ancillary electrical infrastructure is considered a vulnerable type of development. Notwithstanding this, the placement of panels in an area of flood risk must be assessed against their potential to increase the risk of flooding upstream or downstream of the area, through changes to infiltration rates/storage capacity, through obstructing flow, or by increasing run-off. It is therefore considered appropriate that any development located in an area of flood risk is assessed in accordance with the Flood Risk Guidelines to consider indirect flood impacts.

It is nonetheless agreed that solar farms should not be prohibited from being located in Flood Zones A or B, provided they can satisfy the justification test criteria in a Site Flood Risk Assessment. Accordingly, INF OBJ 28 will be amended to reflect this and DM OBJ 147 will be removed as this is a duplication of INF OBJ 28.

6. Support for the diversification of agricultural land into emerging sectors including renewable energy is adequately supported under RUR OBJ 8 of the Draft Plan.

7. In accordance with recent case law, Meath County Council will not delay decision-making in the absence of the publication of the Section 28 Guidelines.

#### Chief Executive's Recommendation

1. Wind energy has been the most significant source of renewable electricity. In 2017, installed wind capacity has increased to 2,851 MW across the island of Ireland. **It is anticipated that Ireland will fall short of its mandatory European target for an overall 16% renewable energy share by 2020, with overall achievement estimated to be between 12.7% and 13.9%.<sup>1</sup>** However, if Ireland is to reach our 2030~~20~~ renewable electricity target, **55% of our electricity generation must be from renewable energy.** ~~the build rate of onshore wind farms must accelerate from an historic average of 180 MW per year to at least 250 MW per year.~~
2. The potential feasible renewable energy options for the County include, but are not limited to, a balanced mix of:
  - Bioenergy - crops, forestry;
  - Biomass - anaerobic digestion, combined heat and power (CHP);
  - Geothermal - hot dry rock reservoirs, groundwater aquifers;
  - Hydro energy - small and micro hydro systems;
  - Solar - **electricity generation**, passive solar heating, active solar heating;
  - Waste - landfill methane gas collection;
  - Wave - wave action, and;
  - Wind - onshore wind, offshore wind (single turbines and groups).
3. No Change recommended
4. No Change Recommended
5. Amend INF OBJ 28 as follows:
 

"To ensure that proposals for the development of solar farms ~~are not~~ located within areas identified as being within Flood Zones A and B **are subject to a Site-Specific Flood Risk Assessment** as per the Planning System and Flood Risk Management Guidelines 2009 for Planning Authorities (or any updated guidelines)"
6. No Change Recommended.
7. No Change Recommended.

<b>Submission No.:</b>	MH-C5-661
<b>Submitted by:</b>	Office of Public Works
<b>Submission Theme(s):</b>	Chapter 6 Infrastructure Strategy, Vol. 2 Written Statement for Settlements, Strategic Flood Risk Assessment
<b>Summary of Submission:</b>	
The Office of Public Works (OPW) welcomes the opportunity to comment on the Draft Plan and notes the provision of objectives and policies set out with regard to Flood Risk Management. These policies and objectives are considered comprehensive and measured. The following comments represent opportunities for improvement on flood risk matters.	
<u>General Comments on Volume 2, SFRA and Zoning Approach</u>	

<sup>1</sup> SEAI National Energy Projections to 2030 - Understanding Ireland's energy transition

It is recommended that objectives relating to flooding in the Volume 2 Written Statement be reviewed and it is suggested that a generic objective be included in each settlement as follows, *“To manage flood risk and development in accordance with policies and objectives set out in Section 6.7.2 of Volume 1 of the County Development Plan and Strategic Flood Risk Assessment in line with the Planning System and Flood Risk Management Guidelines (see Volume 5 SEA, AA and SFRA)”*. It is noted that Section 6.7.10 has been referred to in some chapters referring to flood risk and this is incorrect and may require update to 6.7.2. It is also noted that some settlements such as Athboy are missing objectives relating to flooding risk and this should be reviewed.

In relation to zoning it is submitted that the practise of zoning lands identified at risk of flooding in the current flooding extents as open space, along the extent of flooding, is not good practise. It is considered that an assessment of each individual site should be undertaken and that sites should not be sub-divided and provided with two separate zonings based on current flooding extents. Sites should be assessed based on the justification test if necessary as per MOV POL 4. OPW, as part of the CFRAM programme, prepared Mid-Range and High-End Future Scenario Mapping which is publicly available for a large number of areas within the Draft Plan. These should be used as a resource in this analysis as they do not seem to have been included in the current SFRA. An example of Ashbourne is outlined as part of the submission and it is noted that the application of climate change parameters could result in it being necessary to amend zonings based on site specific flood risk parameters. This should be considered as part of the preparation of the Draft Plan.

Comments are provided in relation to each settlement and these will be addressed in turn below:

#### Ashbourne

Any further development on sites currently zoned which have been demonstrated to be at risk of flooding and located in indicative Flood Zones A or B should be conditioned to carry out FRA to an appropriate level of detail before development takes place. These sites have been identified as part of the subject submission.

#### Athboy

Any further development on sites noted as being at risk of flooding should be conditioned to provide an FRA. Specific sites have been identified as part of the subject submission. It is also considered that no infrastructure objective regarding flooding has been provided as part of the settlement strategy for Athboy.

#### Baile Gibb

This submission notes that this settlement was not assessed as part of CFRAM due to there being no historic record of flooding. It is agreed that this settlement should be continued to be monitored.

#### Ballivor

Any further development on sites noted as being at risk of flooding should be conditioned to provide an FRA. Specific sites have been identified as part of the subject submission.

#### Bettystown / Laytown / Mornington East / Donacarney / Mornington

Any further development on sites noted as being at risk of flooding should be conditioned to provide an FRA. Specific sites have been identified as part of the subject submission. Particular concern is raised in relation to sites where a river channel is identified on both sides of the subject site.

#### Carlanstown

Any further development on sites noted as being at risk of flooding should be conditioned to provide an FRA. Specific sites have been identified as part of the subject submission.

#### Drumconrath

Any further development on sites noted as being at risk of flooding should be conditioned to provide an FRA. Specific sites have been identified as part of the subject submission.

#### Duleek

Any further development on sites noted as being at risk of flooding should be conditioned to provide an FRA. Specific sites have been identified as part of the subject submission.

#### Dunboyne / Clonee / Pace

Any further development on sites noted as being at risk of flooding should be conditioned to provide an FRA. Specific sites have been identified as part of the subject submission. It is noted that one of the specific sites identified is bisected by the River Tolka.

#### Dunshaughlin

Any further development on sites noted as being at risk of flooding should be conditioned to provide an FRA. Specific sites have been identified as part of the subject submission. The OPW have also outlined concern with the appropriateness of zoning a specific zoning of 'A2 – New Residential' which was previously noted as a future wetland. A drainage channel bisects this site and as such it should be assessed further.

#### Enfield

Any further development on sites noted as being at risk of flooding should be conditioned to provide an FRA. Specific sites have been identified as part of the subject submission.

#### Julianstown

Care and assessment to an appropriate level should be undertaken in relation to the River Nanny to the west of the settlement. Development of the B1 lands should be considered carefully in the future.

#### Kells

Any further development on sites noted as being at risk of flooding should be conditioned to provide an FRA. Specific sites have been identified as part of the subject submission. Detailed justification tests may be required for some sites.

#### Kilbride

Any further development on sites noted as being at risk of flooding should be conditioned to provide an FRA. Specific sites have been identified as part of the subject submission. Detailed justification tests may be required for some sites.

#### Kilcock

The OPW has concerns in relation to the Kilcock Environs proposed A2 zonings due to the flood risk extents surrounding the Rye Water. It is considered that a site specific flood risk assessment should be undertaken for these sites prior to development being undertaken. To date it does not appear that any justification test has been undertaken for these lands. It is also considered that access by emergency services needs to be considered.

Planning application outlines the as documented on the 'National Planning Application Database'

do not reflect the boundaries shown within the SFRA for rezoning. These should be assessed and remedied as appropriate. It is considered that a more detailed assessment in relation to the proposed zoning of lands should be undertaken as part of the preparation of the Draft Plan.

#### Kildalkey

Flood extents in this location appear to be based on PFRA and this should be updated. Any further development on sites noted as being at risk of flooding should be conditioned to provide an FRA. Specific sites have been identified as part of the subject submission.

#### Kilmainhamwood

Any further development on sites noted as being at risk of flooding should be conditioned to provide an FRA. Specific sites have been identified as part of the subject submission.

#### Kilmessan

Any further development on sites noted as being at risk of flooding should be conditioned to provide an FRA. Specific sites have been identified as part of the subject submission. Some new residential lands in close proximity to flood risk zones should be considered as part of an FRA.

#### Longwood

Any further development on sites noted as being at risk of flooding should be conditioned to provide an FRA. Specific sites have been identified as part of the subject submission.

#### Maynooth Environs

Flood extents in this location appear to be based on PFRA and this should be updated. It is submitted that there is an error with some lands identified in and use zoning maps, which could be rectified. Any further development on sites noted as being at risk of flooding should be conditioned to provide an FRA. Specific sites have been identified as part of the subject submission.

#### Moynalty

Proposed new residential site is located in Flood Zone C. Observations by JBA in relation to the south and west of the site should be observed and existing development managed in line with INF POL 14 – 29 of the Draft Plan as well as the Planning System and Flood Risk Management Guidelines (2009) and Technical Appendices.

#### Navan

Existing development should be managed in line with INF POL 14 – 29 of the Draft Plan as well as the Planning System and Flood Risk Management Guidelines (2009) and Technical Appendices. Any further development on sites noted as being at risk of flooding should be conditioned to provide an FRA. Specific sites have been identified as part of the subject submission. Detailed justification tests may be required for some sites.

#### Nobber

Any further development on sites noted as being at risk of flooding should be conditioned to provide an FRA. Specific sites have been identified as part of the subject submission. Detailed justification tests may be required for some sites.

#### Ratoath

Flood extents in this location appear to be based on PFRA and this should be updated. Any further development on sites noted as being at risk of flooding should be conditioned to provide an FRA. Specific sites have been identified as part of the subject submission. Detailed justification tests

may be required for some sites.

#### Slane

Any further development on sites noted as being at risk of flooding should be conditioned to provide an FRA or should be water compatible development. Specific sites have been identified as part of the subject submission.

#### Southern Environs of Drogheda

Any further development on sites noted as being at risk of flooding should be conditioned to provide an FRA. Specific sites have been identified as part of the subject submission. Detailed justification tests may be required for some sites. If this zoning is to be done as part of the Joint Urban Area Plan for Drogheda then the rezoning may be deferred until this analysis is complete.

#### Stamullen

Flood extents in this location appear to be based on PFRA and this should be updated. Any further development on sites noted as being at risk of flooding should be conditioned to provide an FRA. Specific sites have been identified as part of the subject submission. Detailed justification tests may be required for some sites.

#### Trim

Flood extents in this location appear to be based on PFRA and this should be updated. Any further development on sites noted as being at risk of flooding should be conditioned to provide an FRA. Specific sites have been identified as part of the subject submission. Detailed justification tests may be required for some sites.

#### Other Comments

Justification tests have been provided for distributor roads in Dunboyne, Drogheda Southern Environs, Kilcock and Maynooth. No route information has been provided in the justification tests and as such it is not possible to assess where they are or what impact they may have. It is requested that this document be updated.

### **Chief Executive's Response**

#### General Comments on Volume 2, SFRA and Zoning Approach

Volume 1 Written Statement includes within the Infrastructure Chapter detailed policies and objectives in relation to flooding in Section 6.10.2. It is not considered necessary to re-state the Flooding policies and objectives as detailed under Section 6.10.2 'Flood Risk Management' in each of the 38 Written Statements. INF Pol 18 to INF POL 29 and INF OBJ 20 to INF OBJ 28 provide detailed policies and objectives which apply to all development proposals within lands at risk of flooding and are the overarching policies and objectives which apply to all settlements detailed in Volume 2. It should also be noted that the lands in each settlement to which this submission refers have been zoned for numerous development plans and that there are no additional lands proposed to be zoned. No new zoning is proposed on lands at risk of flooding, with the exception of water compatible uses in the form of D1 Tourism zoning. Developments on such lands will be subject to a detailed Justification Test at Development Management Stage.

In relation to the zoning approach it is considered that the strategy employed under the SFRA undertakes land zoning according to the mapped risk (Sequential Approach) and where uncertainty exists then further analysis is undertaken at Development Management stage to



ensure a commensurate level of assessment. The principle of avoidance has been followed and specific recommendations are made for Flood Risk Assessment at Development Management stage.

Any incorrect references within the Written Statements to Chapter 6 will be addressed as part of the errata to be included within the Appendices of this CE Report.

Comments are provided in relation to each settlement and these will be addressed in turn below:

#### Ashbourne

Any development on sites noted as being at risk of flooding will be required to carry out a SSFRA. It should be noted that no new zonings are proposed in Ashbourne and that the existing zonings referenced have been in place for numerous development plan periods.

#### Athboy

Any further development on sites noted as being at risk of flooding will be required to carry out a SSFRA. It should be noted that no new zonings are proposed in Athboy and that the existing zonings referenced have been in place for numerous development plan periods.

#### Baile Gibb

The submission notes that this settlement was not assessed as part of CFRAM due to there being no historic record of flooding.

#### Ballivor

Any further development on sites noted as being at risk of flooding will be required to carry out a SSFRA. It should be noted that no new zonings are proposed in Ballivor and that the existing zonings referenced have been in place for numerous development plan periods.

#### Bettystown / Laytown / Mornington East / Donacarney / Mornington

Any further development on sites noted as being at risk of flooding will be required to carry out a SSFRA. It should be noted that no new zonings are proposed in BLMD and that the existing zonings referenced have been in place for numerous development plan periods and have been as per planning applications and will be subject to Justification Test (JT).

#### Carlanstown

Any further development on sites noted as being at risk of flooding will be required to carry out a SSFRA. It should be noted that no new zonings are proposed in Carlanstown and that the existing zonings referenced have been in place for numerous development plan periods.

#### Drumconrath

Any further development on sites noted as being at risk of flooding will be required to carry out a SSFRA. It should be noted that no new zonings are proposed in Drumconrath and that the existing zonings referenced have been in place for numerous development plan periods.

#### Duleek

The A2 zoned lands have a channel flowing through it, which is not predicted to overtop. The site will require a detailed FRA to assess the risk and INF POL 22 requires a development free strip of 10m either side of the channel.

#### Dunboyne / Clonee / Pace

Any further development on sites noted as being at risk of flooding will be required to carry out a

SSFRA which will be assessed in detail at DM stage.

#### Dunshaughlin

Any further development on sites noted as being at risk of flooding will be required to carry out a SSFRA. It should be noted that no new zonings are proposed in Dunshaughlin and that the existing zonings referenced have been in place for numerous development plan periods.

#### Enfield

Any further development on sites noted as being at risk of flooding will be required to carry out a SSFRA. It should be noted that no new zonings are proposed in Enfield and that the existing zonings referenced have been in place for numerous development plan periods.

#### Julianstown

Any further development on sites noted as being at risk of flooding will be required to carry out a SSFRA. It should be noted that no new zonings are proposed in Julianstown and that the existing zoning referenced have been in place for numerous development plan periods.

#### Kells

Any further development on sites noted as being at risk of flooding will be required to carry out a SSFRA. It should be noted that no new zonings are proposed in Kells and that the existing zonings referenced have been in place for numerous development plan periods.

#### Kilbride

Any further development on sites noted as being at risk of flooding will be required to carry out a SSFRA. It should be noted that no new zonings are proposed in Kilbride and that the existing zonings referenced have been in place for numerous development plan periods.

#### Kilcock

Any further development on sites noted as being at risk of flooding will be required to carry out a SSFRA. It should be noted that no new zonings are proposed in Kilcock and that the existing zonings referenced have been in place for numerous development plan periods.

#### Kildalkey

Any further development on sites noted as being at risk of flooding will be required to carry out a SSFRA. It should be noted that no new zonings are proposed in Kildalkey and that the existing zonings referenced have been in place for numerous development plan periods.

#### Kilmainhamwood

Any further development on sites noted as being at risk of flooding will be required to carry out a SSFRA. It should be noted that no new zonings are proposed in Kilmainhamwood and that the existing zonings referenced have been in place for numerous development plan periods. The existing A2 New Residential site is located in Flood Zone C.

#### Kilmessan

Any further development on sites noted as being at risk of flooding will be required to carry out a SSFRA. It should be noted that no new zonings are proposed in Kilmessan and that the existing zonings referenced have been in place for numerous development plan periods.

#### Longwood

Any further development on sites noted as being at risk of flooding will be required to carry out a SSFRA. It should be noted that no new zonings are proposed in Longwood and that the existing

zonings referenced have been in place for numerous development plan periods.

#### Maynooth Environs

The lands of Maynooth Environs have been zoned for numerous development plan periods and risk can be managed at DM stage with site specific FRA.

#### Moynalty

The A2 News Residential lands referenced have been zoned for numerous development plans. No new zonings are proposed. Risk can be managed at DM stage with site specific FRA.

#### Navan

The zoning approach has followed the Sequential Approach and CFRAM outlines have been used. With the exception of a D1 Tourism zoning, no new zonings are proposed. Risk can be managed at DM stage with site specific FRA.

#### Nobber

Any further development on sites noted as being at risk of flooding will be required to carry out a SSFRA. It should be noted that no new zonings are proposed in Nobber and that the existing zonings referenced have been in place for numerous development plan periods.

#### Ratoath

All A2 New Residential lands are located in Flood Zone C and the Sequential Approach has been applied. Risk can be managed at DM stage by site specific FRA. No new zonings are proposed on lands at risk of flooding.

#### Slane

No new land use zonings are proposed within Slane. The A2 New Residential zoning has applied to these lands for numerous development plans and the development of these lands and the D1 Tourism lands will be subject to a JT at DM stage.

#### Southern Environs of Drogheda

No new land use zonings are proposed within South Drogheda and a review of the land use zonings will occur under the Joint Urban Area Plan.

#### Stamullen

G1 use can include water compatible development and it is already stipulated in the SFRA under Section 5.38 that any new development under the proposed G1 land use zoning bordering the River Delvin should be subject to appropriately detailed FRA at the development management stage in line with the MCDP policies. This will ensure that risk is managed and it is not recommended that the JT is applied at Plan Making stage.

#### Trim

All undeveloped residential zoned land (A2) has applied the sequential approach and is located within Flood Zone C. The Justification Test does not need to be applied. Risk can be managed at DM stage.

#### Other Comments

These routes are indicative routes only and the exact route information is not available until the detailed design stage. The Section 50 procedure (managed by OPW) will ensure that risk is appropriately managed.

**Chief Executive's Recommendation**

No change recommended.

**Submission No.:**

MH-C5-760

**Submitted by:**

Irish Water

**Submission Theme(s):**

Chapter 6 Infrastructure

**Summary of Submission:**

Irish Water highlighted a number of points in relation to both Wastewater and Water. The following comments on Wastewater are outlined below:

1. Where there are constraints on wastewater treatment plants, applications for developments would be on a first come, first served basis. If no project is associated with a constrained area, then any infrastructure will be developer led. Irish Water can work with developers to form the best solution for a particular site.
2. There are some constraints in the sewer networks in many settlements. e.g Farganstown and South Drogheda are reliant on LIHAF projects being completed. Other areas, particularly if zoning changes are proposed, infrastructure will have to be assessed on a case by case basis.

The following points were highlighted in relation to Water Infrastructure:

3. Water supply for the most of the Meath area is at or near capacity, and constrained for winter critical periods (freeze thaw events) and dry year critical periods (drought events). The longer-term plan for Meath is to link it to the Great Dublin Area (GDA) to allow transfers from the Water Supply Project. This will allow for growth and reduce outages during droughts or freeze thaw events. Until then, the availability of water will be on a first come, first served basis with priority given to domestic customers. Non-domestic developments will be asked to review their proposals to reduce water requirements. In the meantime, leakage control and water conservation will be of utmost importance.
4. The submission also recommends a number of minor non-material text amendments.

**Chief Executive's Response**

1. The Council notes that this comment relates to applications received by Irish Water for connections to their Wastewater network.
2. Comments in relation to the delivery of upgrades in Farganstown and South Drogheda are noted.
3. While water and/or water network capacity is currently constrained in some settlements in Meath, it is not factually correct that "Water supply for most of the Meath area is at or near capacity".

In many settlements, there is significant capacity, while in others, the Council is working with Irish Water to deliver infrastructural upgrades during the current CIP (2020-2024) which will remove network constraints, improve resilience and facilitate planned development and growth.

Not all of Meath will be served by the Water Supply Project via the GDA, in the long term. While this is the long term (post 2030 and beyond the lifespan of the new Meath CDP) proposal for some areas of the County, in particular East Meath and Navan, much of the remainder of the county will continue to be served by existing Public Water Supplies.

4. The minor text amendments suggested are accepted.

#### Chief Executive's Recommendation

Amend Section 6.4 Water Services 3<sup>rd</sup> Paragraph as follows:

**The Current Irish Water Investment Plan (CIP 2020-2024)** ~~The current Irish Water Capital Investment Programme (CIP) 2017-2021~~ outlines the indicative priorities and investments in water services infrastructure over the five year period.

Amend Section 6.6 Policy Context 2<sup>nd</sup> Paragraph as follows: **In November 2019, An Bord Pleanála granted planning permission for the Greater Dublin Drainage Project** ~~An Bord Pleanála are currently assessing a Strategic Infrastructure Development application for a new treatment plant and outfall, a decision is due in 2019.~~

Section 6.7 Drinking Water – Add the following text to the end of the last paragraph:  
Irish Water intend to seek planning permission for this project in ~~2019-2020~~. Irish Water is preparing for the future by developing the National Water Resources Plan (NWRP). The strategic plan for water services will outline how we move towards a sustainable, secure and reliable public drinking water supply over the next 25 years, whilst safeguarding our environment. The NWRP will outline how Irish Water intends to maintain the balance between our supply from water sources around the country and demand for drinking water over the short, medium and long-term. This will allow preparation for the future and ensure the provision of sufficient safe, clean drinking water to facilitate the social and economic growth of our country.

Section 6.8 INF OBJ 4 – Amend INF OBJ 4 as follows:

‘To liaise and work in conjunction with Irish Water in the delivery of the Capital Investment Plan ~~2017-2021~~ **2020-2024** and any subsequent Capital Investment Plans.’

Section 6.9 Waste Water – Amend as follows: Irish Water is progressing the GDD Project and it is envisaged that it will be realised by ~~2024~~ **2026**.

<b>Submission No.:</b>	MH-C5-774
<b>Submitted by:</b>	SSE
<b>Submission Theme(s):</b>	Chapter 6 Infrastructure, Chapter 10 Climate Change
<b>Summary of Submission:</b>	
<ol style="list-style-type: none"> <li>1. <b>Onshore Wind:</b> The Draft Meath County Development Plan states an intention to investigate the preparation of a Renewable Energy Strategy promoting technologies which are most viable in the County. SSE welcome this and would encourage the Council to undertake this task to ensure the county can effectively contribute to national and EU targets. This should include and strategy for wind energy development. We also recommend the consistent application of the Wind Energy Guidelines. Divergence at a local level creates uncertainty for developers and makes the proposition</li> </ol>	

of seeking permission for new wind farms a challenging prospect. As a responsible developer, SSE is committed to best practice in developing our projects. Clear standards enable us to progress projects with confidence; unclear standards discourage investment.

2. **Grid Development:** Welcomes the recognition given to the importance of ensuring a modern and effective national electricity grid. We welcome the inclusion of INF POL 46—49 which highlight the importance of facilitating the development of enhanced electricity and gas supplies, and associated networks, to serve the existing and future needs Of the County. The North-South interconnector is an important piece of infrastructure as acknowledged in the draft Plan.
3. **Offshore Wind:** Integrated land and sea planning is also critical. The submission believes offshore wind in particular presents a significant Opportunity for the East Coast as conditions in the Irish Sea are especially conducive to fixed- bottom Offshore wind turbines. We welcome INF POL 30 which commits to implementing the policies and objectives as set out within the National Maritime Planning Framework to realise the full benefits of our ocean wealth in a managed and sustainable way ensuring climate change is taken into account.  
Alignment between national, regional and local planning policies is of critical importance to all those involved in infrastructure development. Consistency at local authority level is needed to provide clear guidance for wind energy project promoters and Other stakeholders, who make large investments in bringing to planning phase projects which will support Ireland in meeting its climate targets.
4. **Security of Supply:** Welcomes the priority given to reducing GHG emissions in energy, heat and transport in the draft Plan. Shifting away from fossil fuels is of critical importance. Flexible thermal generation which can provide low carbon efficient baseload power, is expected to be required out to 2040 in all scenarios, according the EirGrid's Tomorrow's Energy Scenarios<sup>5</sup> (published in 2019). Flexible gas generation will be the transitional fuel during the decarbonisation of the sector, underpinning security of supply.

This is all the more important for the Eastern region which has a significant energy demand due to the concentration of economic activity and the demographics of the area. In light of this, we welcome INF POL 46 which seeks to support and facilitate the development of enhanced electricity and gas supplies, and associated networks, to serve the existing and future needs Of the County.

5. **Energy efficiency and the electrification of heat:** Welcomes INF POL 36—40 which seeks to promote sustainable energy sources in heating, increase energy efficiency and innovative pilot schemes designed to reduce emissions. We also welcome INF OBJ 49 which seeks to support the use of heat pumps where appropriate for domestic and commercial development. SSE believes that the electrification of heat has a leading role to play in realising Ireland's decarbonisation potential and reducing air pollution. We welcome the ambitious plans for heat pump installation in the Climate Action Plan. The ongoing decarbonisation of electricity supply and recent innovations in electricity based renewable technologies including air source pumps, make electricity an attractive option as the clean, low carbon energy choice for heating.

A partnership approach and continued collaboration between energy suppliers, the SEAI and local authorities will be vital given the scale of energy savings required in the next decade. We are proud of the work we have undertaken with Local Authorities to date and look forward to continuing this as part the 'one-stop-shop' to energy efficiency being developed. We believe Meath's County Development Plan should reflect Action 64 in the Climate Action Plan which seeks to introduce minimum BER standards in the Local

Authority social housing stock as part of retrofit works being carried out on Older stock or refurbishment of vacant dwellings.

6. **Electrification of transport:** Transport as a sector is one of the significant contributors to our national Green House Gas (GHG) emissions. The need to transition to a low carbon society by reducing transport usage and moving to lower carbon options is a key aspect of Ireland's response to climate change. We welcome the ambition to have one million Electric Vehicles on Ireland's roads by 2030. Spatial planning will be critical to achieving this. Funding for the deployment of targeted electric vehicle charging infrastructure across the region will be vital to meet the changing needs of commuters with particular emphasis in public parking areas and employment locations. We welcome the priority given to boosting EV charging infrastructure across the county in the Plan.

#### **Chief Executive's Response**

1. Meath County Council are committed to the preparation of a Renewable Energy Strategy during the lifetime of the Development Plan. This is supported by INF OBJ 47 of the Draft Plan.  
It is noted the most up-to-date Government guidance on this matter remain the 'Wind Energy Developments Guidelines for Planning Authorities, 2006'. In December 2019, the DoHPLG published a draft Revised Wind Energy Development Guidelines for public consultation. To date, given that the Department has not finalised its targeted review of the current guidelines, these guidelines remain in full effect and the Planning Authority must be consistent with the standards set out in same. The Planning Authority will ensure consistency with guidelines and any subsequent Wind Energy Guidelines, once formally adopted.
2. Support for INF POL 46 to INF POL 49 relating to the development of the grid network is noted and welcomed.
3. Support for INF POL 30 are noted and welcomed. In this regard, please refer to response to Eirgrid submission MH-C5-430 for further details on marine related planning policy.
4. Support for INF POL 46 to facilitate the development of enhanced electricity and gas supplies is noted and welcomed.
5. Comments relating to energy efficiency and the electrification of heat are noted and welcomed. In accordance with Rebuilding Ireland, all new social housing stock will be nearly zero energy buildings and have a typical Building Energy Rating (BER) of A2. Existing dwellings undergoing major renovations will be required to achieve a BER of B2 or equivalent. With regard to the retrofitting of existing social housing stock, the Climate Action Plan 2019 is noted throughout the Draft Plan particularly as part of the Section 11.6.1 Energy Efficiency. It is, however, considered that it is not appropriate as part of the Draft Plan to provide an objective that would require social and affordable housing units to meet certain BER requirement. Such matters relate to building regulations and would not be enforceable through any planning mechanism. As such, a policy or objective relating to this matter will not be provided as part of the Draft Plan.
6. Support for the deployment of targeted electric vehicle charging infrastructure across the region in the Draft plan is noted and welcomed.

#### **Chief Executive's Recommendation**

No Change Recommended.



<b>Submission No.:</b>	MH-C5-808
<b>Submitted by:</b>	North East Pylon Pressure
<b>Submission Theme(s):</b>	Chapter 6 Infrastructure
<b>Summary of Submission:</b>	
<p>This submission from NEPPC refers specifically to the development of the North South Interconnector and Volume 1 Chapter 6.15.4.</p> <p>NEPPC group accepts the logic for a second NSI, but vehemently disagrees with both the scale of the proposal and with the choice of overhead transmission lines instead of underground cables. The mains comments raised are:</p> <ul style="list-style-type: none"> <li>• Where Section 6.15.4.1 states ‘the importance of ensuring that the existing networks can be upgraded and can provide enhanced capacity’ it is submitted that this is often a forgotten aspect. Technology advances allow for much better upgrade efficiencies from existing transmission lines. This should be the starting point – upgrade our existing infrastructure that is already approved and in situ, using latest technologies such as HTLS system.</li> <li>• 6.15.4.2 states Section 10.3 of the RSES outlines the following in relation to future north-south electricity interconnections <i>“Increased connectivity with other grids is also needed and projects such as the north–south interconnector are of great importance for the region”</i>. The primary need for the second interconnector is unrelated to any needs in Meath or the EMRA region. Its primary objective is security of supply for Northern Ireland. Note the following statements from the EirGrid planning application in June 2015: (Volume 2A p13-17) The second North-South Interconnector will add security to the grid, but on a national level, it is only passing through Meath.</li> <li>• The proposed development will result in significant residual environmental effects on landscape character, on drumlins, on a small number of lakes in close vicinity to the proposed development, on two river valleys, on a small number of demesne landscapes and on the landscape setting of some historic features of the built environment. The proposed development therefore conflicts in principle with the policies INF POL 48 of the respective County Development Plans’. (P.483)</li> <li>• The proposed line crosses significant areas relevant to above, including the Boyne and Blackwater cSAC’s/SPA’s, and is in close proximity to the world heritage site of Tara. In the case of the Boyne and Blackwater there are numerous river crossings planned and one pylon proposed within 6 metres of the SAC boundary. The line traverses areas of high landscape character and sensitivity which will conflict with INF POL 52.</li> <li>• Underground cables and overhead lines have significantly different footprints through the countryside when completed.</li> </ul>	
<b>Chief Executive’s Response</b>	
<p>The concerns raised by NEPPC on the North-South Interconnector are noted. The north-south interconnector is an above ground electricity connection proposal linking the existing converter station at Woodland, Batterstown, Co. Meath and traversing through Meath, Cavan and Monaghan linking to a converter station at Turleenan in County Tyrone. Planning permission was granted by An Bord Pleanála for the sections in Counties Meath, Cavan and Monaghan in December 2016. Following a successful legal challenge, planning permission for the northern section of the interconnector has been delayed. However, this delay relates exclusively to the planning proposals in the Northern Ireland jurisdiction and has now proceeded beyond all planning and legal hurdles in the Republic of Ireland.</p> <p>The decision to make the interconnector above ground was outside of the remit of the Local Authority</p>	

and the project design was determined by Eirgrid. Though Meath County Council were consulted on the detailed design, given that the Interconnector constituted strategic infrastructure development, the project was submitted directly to and assessed by An Bord Pleanála in 2016.

The concerns raised by the NEPPC relating to residual environmental effects, in particular Natura 2000 sites, landscape character and sensitivity and impacts on heritage have been assessed as part of the Environmental Impact Assessment and Natura Impact Assessment Report submitted with the Planning application and has been found to be compliant with the Meath County Development Plan. The planning approval granted by An Bord Pleanála is now in the implementation stages.

#### Chief Executive's Recommendation

No Change Recommended.

<b>Submission No.:</b>	MH-C5-838
<b>Submitted by:</b>	Councillor Trevor Golden
<b>Submission Theme(s):</b>	Chapter 6 Infrastructure
<b>Summary of Submission:</b>	
<p>This submission relates to the provision of broadband services in Architectural Heritage Areas and highlights that Objective INF OBJ 53 has potential to render several town centres and parts of urban areas uneconomically viable to deliver fibre broadband.</p> <p>INF OBJ 53 To require that open access communications cables and associated infrastructure are undergrounded in urban areas with particular reference to Architectural Conservation Areas in order to protect the visual amenities of streetscapes.</p>	
<b>Chief Executive's Response</b>	
<p>This point is also highlighted in EIR submission. It is acknowledged that it may not be appropriate in all circumstances to place all cables underground in Architectural Conservation Areas (ACA's) if suitable over ground alternatives are available. However, agreement of over ground works in ACA's will be subject to planning consent process with Meath County Council. INF OBJ 53 will be amended accordingly to reflect this.</p>	
<b>Chief Executive's Recommendation</b>	
<p>Suggest amending wording to:</p> <p>Amend INF OBJ 53 as follows:</p> <p>To require that open access communications cables and associated infrastructure are undergrounded in urban areas with particular reference to Architectural Conservation Areas in order to protect the visual amenities of streetscapes." <b>Proposals for overground cables located within Architectural Conservation Areas will be considered on a case by case basis and are subject to outcome of the development management process.</b></p>	

# Chapter 7

## Community Building Strategy

<b>Submission No.:</b>	MH-C5-12
<b>Submitted by:</b>	Damien O' Reilly
<b>Submission Theme(s):</b>	Chapter 7 Community Building Strategy
<b>Summary of Submission:</b>	
<p>Submissions refers to Section 7.7.9 SOC OBJ 21 Burial Grounds i.e. To include provision for graveyards in all settlements and LAPs.</p> <p>It is requested that 'with regard to ground and surface water' is deleted as there is no national legislation regarding water tables in graveyards in Ireland.</p>	
<b>Chief Executive's Response</b>	
<p>This issue was previously raised as part of the NOMS.</p> <p>A greater level of customer service can be achieved where burial gardens are developed at a regional or population centric level. It would be difficult to identify lands suitable for burial gardens from a desk study as the deciding factor on suitability is the soil and water conditions which can only be verified through intrusive site investigations.</p> <p>Groundwaters and surfaces waters should be afforded the best level of protection possible, it is acknowledged burials may contribute to water contamination. While there is no Irish legislation, policy or guidance we must endeavour to use best practice and therefore we use the UK Environment Agency guidelines for protection of groundwaters which recommended a minimum of 1m between the deceased and groundwater and rock. It is recommended that the use of same continues.</p>	
<b>Chief Executive's Recommendation</b>	
No change recommended.	

<b>Submission No.:</b>	MH-C5-23
<b>Submitted by:</b>	JPC Public Order & ASB Sub Committee
<b>Submission Theme(s):</b>	Chapter 7 Community Building Strategy
<b>Summary of Submission:</b>	
<p>This submission outlines the view of the JPC Public Order &amp; ASB Sub Committee which includes the following:</p> <ol style="list-style-type: none"> <li>1. The committee at its inaugural meeting since the 2019 Local Elections discussed the lack of appropriate accommodation for Gardaí. This submission requests that improved and modernised conditions should be provided for the Gardai in the proposed new Policing Plan for Co Meath and in particular in Navan, Ashbourne, Trim and Laytown Garda Stations given the unsuitable and overcrowded conditions being experienced by the gardai stationed there at the moment.</li> </ol>	
<b>Chief Executive's Response</b>	
<p>The important role of the JPC is cited in the Draft Plan. Section 7.4.1 refers. The issues outlined in the submission are acknowledged, however they are outside the strategic land use function of the County Development Plan. They can be more appropriately addressed through the Development Management process where necessary and /or the relevant Policing Plan.</p>	

**Chief Executive's Recommendation**

No change recommended.

**Submission No.:**

MH-C5-53

**Submission by:**

Suzanne McDonagh

**Submission Theme(s):**

Chapter 7 Community Building Strategy

**Summary of Submission:**

- The submission relates to the provision of Community Facilities, in particular the provision of facilities for older children and teenagers.
- The submission states that a community hall/amenity hall is needed for older children. A basketball/tennis scout/skateboard park is suggested.
- An urgent decision required on the location of the proposed secondary school.
- Submission states that no more houses should be permitted without facilities.

The submission does not clarify the location in which it is referring to.

**Chief Executive's Response**

It is unclear from the submission what settlement/location this submission is referring to. However, the Draft Plan contains numerous policies supporting the development of community facilities and ensures that adequate lands and services are zoned and reserved throughout the County to cater for the establishment, improvement or expansion of all community facilities where required.

The provision of education facilities is a matter for the Department of Education and Skills (DoES) and other relevant educational authorities. Please refer to submission no 824 from the DoES in this regard.

With regard to future housing applications, the Council acknowledges the need for social infrastructure to be provided in tandem with residential and other development. SOC POL's 4, SOC POL 5 and SOC POL 6 (SIA requirement) will ensure a holistic approach which incorporates the provision of essential and appropriate community facilities, amenities and services, is taken in the design and planning of new residential areas, to ensure the development of viable sustainable communities.

**Chief Executive's Recommendation**

No change recommended.

**Submission No.:**

MH-C5-76

**Submission by:**

Youth Work Ireland Meath

**Submission Theme(s):**

Chapter 7, Community Building Strategy

**Summary of Submission:**

Submission requests the provision of a purpose built youth centre in the county. Reference is made to the increasing youthful population. It is stated that County Meath is becoming a place of disadvantage for young people.

It is submitted that this youth facility should be:

- designed in collaboration with young people and be made as multi use and

multifunctional as possible.

- be available to young people to access services, activities and programmes when it is needed by the young people (e.g. outside school hours).
- staffed by trained professionals in youth work, mental health provision, and agencies working for the benefit, safety and interests of the young people.

#### Chief Executive's Response

There are a number of youth facilities within the county including Youth Work Ireland Meath, Foroige and Involve. They provide youth club facilities and meeting space for all young people. Although the central base for most of these groups is Navan, attempts are being made to set up outreach centres in other parts of the county to ensure that young people have as much access to the services as possible. SOC OBJ 1 which refers to the provision of youth clubs/cafes in the County provides sufficient policy support in this regard.

#### Chief Executive's Recommendation

No change recommended.

<b>Submission No.(s):</b>	MH-C5-153
<b>Submission by:</b>	Bobby McCormack (Development Perspectives)
<b>Submission Theme(s):</b>	Chapter 7. Community Building Strategy and Chapter 10. Climate Change Strategy.
<b>Summary of Submission:</b>	
<p>This submission is made on behalf of Development Perspectives whose mission is to tackle poverty, inequality and climate change through transformative education and active global citizenship.</p> <p>In summary the following recommendations are made:</p> <p>1. Development Education</p> <p>"Development Education" needs to be identified in the plan as a way of dealing with the root causes of Poverty, inequality, climate change, homelessness and conflict at a local, county and national level. Development at a county level needs active and informed citizens. Development Perspectives urges Meath County Council to embed Development Education into the new County Development plan in a number of ways.</p> <ul style="list-style-type: none"> <li>• Implement a public awareness campaign about the Sustainable Development Goals - this could be done through the Meath Climate Academy.</li> <li>• 2. Provide Development Education training to the members of the Meath PPN.</li> <li>• Tackle poverty, inequality and climate change by addressing the root causes of these issues.</li> </ul> <p>In particular, Development Perspectives is asking Meath Council to work with the LMETB to commit to Development Education as a way of making the communities we live in more sustainable, equal and just.</p> <p>2. Need to tackle income equality</p> <p>Currently, the plan does not consider income equality in the narrative contained in the plan. This</p>	

is a serious omission and deficit. Crime, mental health issues, child well being, longevity and drug use are all impacted positively by lessening the levels of income inequality in County Meath.

### 3. Agricultural Emissions

It is obvious from viewing the current draft of the plan that agricultural emissions in County Meath are not being addressed. This serious omission needs to be addressed. The target for lessening emissions for the county is too low. 4% annually is simply not enough of a contribution to make. If the Climate emergency is to be taken seriously then 7-11% is a more ambitious but realistic target. With that in mind, focusing only on energy, transport and housing will not deliver the reductions necessary. Farmers need to be worked with to transition away from the level of beef and dairy agriculture that is currently engaged in within the county boundaries. A move to smaller, more localised farming is necessary.

### 4. Public Transport and Health

Development Perspectives urges Meath County Council to invest much more in public transport and away from construction of new roads. In our opinion, rail and bus needs greater attention. We would also argue that cycling needs more attention in the new plan. This has the significant added benefit of contributing to healthy communities.

### Chief Executive's Response

1. In relation to items no. 1 and 2, the points raised are laudable however, are beyond the scope of the strategic land use function of the Development Plan. It is noteworthy however, that Social inclusion is a cross cutting theme within the Development Plan. The Plan has been proofed to ensure it has a strong social inclusion and community participation focus with regard to the identified target populations. The Plan aims to ensure that social inclusion and community participation continues to underpin all policies and objectives pursued. Section 7.6 Social Inclusion is of particular relevance in this regard. There also a number of supporting policies and objectives set out in Volume 2 which relates to the individual settlements.

3. The Chief Executive agrees that the reduction of carbon emissions in the agricultural sector will be a necessary component in the decarbonisation of the economy. County Meath has a strong agricultural industry and the reduction of carbon emissions will require significant changes in farming practices. In the absence of clear guidance in this respect, the Council will look at off-setting carbon emissions through support for alternative rural economic enterprises that will increase the amount of carbon stored in the soil and vegetation such as forestry, grassland and other types of agricultural diversification. As outlined in RUR POL 17 and RUR POL 20, Meath County Council will work with the Department of Agriculture, Teagasc and all other stakeholders to maintain a vibrant and healthy agricultural sector based on the principles of sustainable development

4. The Council does not have a direct role in the provision of public transport services. However, it actively promotes and facilitates the improvement of both bus and rail services both within and from Co. Meath and is committed to working in conjunction with all transport providers and stakeholders in terms of the delivery of a reliable, accessible and integrated transport network that supports the effective functioning of the county.

The Draft Plan includes MOV POL 8 as follows, *'To co-operate with the NTA and other relevant agencies to have ongoing reviews of the network of bus routes in Meath, and to support and encourage public transport operators to provide improved bus services in, and through, the County.'*



**Chief Executive's Recommendation**

No change recommended.

<b>Submission No.(s):</b>	MH-C5-163
<b>Submission by:</b>	Health Service Executive -Environmental Health
<b>Submission Theme(s):</b>	Chapter 7 Community Building Strategy
<b>Summary of Submission:</b>	
<p>The submission supports and recommended that:</p> <ol style="list-style-type: none"><li>1. MCC take this opportunity to incorporate various health actions from key health strategies into the strategic planning of the spatial and built environment of the county, with the overall aim being to improve the health and well-being of the county.</li><li>2. MCC should create environments which make the health choice an easy choice in line with 'Healthy Ireland-A Healthy Weight for Ireland.</li><li>3. Various initiatives to increase activity in the built environment in line with 'Get Ireland Active'.</li><li>4. The plan should recognise that Co. Meath has a young population, and this should be recognised in the planning and development of services and facilities for the younger members of the County.</li><li>5. That MCC ensures continued meaningful consultation with communities who may not natural connect online.</li><li>6. Recommendations to promote social inclusion is set out in line with 'Time to move on from congregated settings-A strategy for community inclusion.</li><li>7. Include recommendations in relation to the National Positive Ageing Strategy including , an overall assessment of housing need, the incorporation of universal design as well as the principles from the 'Deign out Crime Document '</li><li>8. It is essential that planning of employment sites takes the health and well-being of workers into consideration. Travel plans, strong connectively, cycle parking, recreational activities etc. are recommended.</li><li>9. Request that applications which include smoking areas are referred to the Environmental Health Service.</li><li>10. That MCC should include a strategy to reduce and eliminate the reliance on alcohol sponsorship and development the provision of alcohol -free venues.</li><li>11. That MCC increases public and active transport options, including the provision of public transport options, developing cycle lands, public bike storage and bike sharing schemes. In particular that it prioritises a shift from private vehicle use to public and active transport. This shift is important for place making, health and well-being, and sustainability.</li><li>12. In line with the Urban Design Manual, recommendations are made in relation to promotion of compact growth, mix of uses, household types etc.</li><li>13. Detailed proposals for planning for parks are also recommended as well as the benefits of bio diversity and green areas.</li><li>14. Transport recommendations are included.</li><li>15. Support for the delivery of the Dublin rail line as well as the extensions of rails services is expressed.</li><li>16. Strongly recommends the provision of real time travel information at bus shelters as a</li></ol>	

way to improve the quality of the service.

17. MCC allocates more of its budget to active transport schemes and Sustainable Travel Infrastructure.
18. Specific proposals in line with the Smarter Travel policy is recommended.
19. Detailed proposals with regard to waste management in line with 'A Resource Opportunity- Waste Management Policy in Ireland' are detailed including that the Development Plan should implement the Waste Hierarchy set out in the Water Framework Directive and place prevention and minimisation at the forefront of any waste policy.
20. MCC should ensure the provision of safe secure drinking water and promote the reduction in waste and over use of water.
21. In terms of Climate Change the CDP should ensure that climate change considerations are fully integrated into the planning of new projects and their design.
22. In terms of environmental noise, it is recommended that a Noise Impact Assessment is carried out for any development proposals with the potential to give rise to noise effects.
23. Recommendations are made with regard to reducing polluting emissions into air and increase air quality in the County.
24. That MCC develop a water management plan which will ensure that waterways are protected from hazardous run-offs and decreases the risk of flooding.
25. That MCC work together with the Meath Community, along with the DPH, HSE North East, to understand the enablers, barriers and constraints involved in creating healthy urban environments and to co-create solutions together with the community.
26. The DPH, HSE North East supports the Draft Plan and its intent to enable growth by providing clear directives for residents and resident business with regards to the planning system.
27. From a public health perspective, the DPH are especially supportive of a unified county approach that facilitates high quality urban intensification as a means to support growth in all sectors. The benefits of compact growth are detailed.

#### **Chief Executive's Response**

The submission from the HSE (Environmental Health division) is welcomed. It is acknowledged that land use planning has a significant role in creating and supporting healthy communities and this is reflected in Section 7.7.5 Healthy Communities of the Draft Plan.

The Draft Plan highlights the importance of sporting, leisure and recreational facilities in promoting good health, social cohesion, a sense of community and enhancing a quality of life and well-being. SOC POL 31-37 and SOC OBJ 7-10 are of relevance in this regard.

1 & 2. The request to incorporate various health actions from key health strategies into the strategic planning of the spatial and built environment of the county is noted and it is considered that such initiatives are already included throughout the Draft Plan by the promotion of sustainable development measures, with the overall aim being to improve the health and well-being of the county. There are numerous policies set out in the Plan which seek to promote healthy living for example, policies to provide cycle ways, walkways, tourism initiatives, protection and promotion of heritage and environmentally sensitive sites.

3. It is noteworthy also, that Meath Local Sports Partnership (LSP) in cooperation with the Meath County Council and the HSE aims to help people to increase their physical activity levels through various activities including walking and cycling. Meath LSP works with member agencies and local community groups on an ongoing basis to provide opportunities to participate in sport and physical activity to all. 'Section 7.7.5 refers to the contribution of MLSP to increasing the level

of physical activity in the County and policy SOC OBJ 8 supports the delivery of their relevant strategies and plans. The Development Plan has been proofed to ensure it has a strong social inclusion and community participation focus with regard to the identified target populations.

4. The Plan explicitly refers to the census data regarding Meath's young population (Section 7.6.2.1) in particular the increase on primary school population by 14.4% is noted. This analysis informed decision making on present and future needs for facilities such as childcare facilities, play areas, sports facilities, schools, health centres etc. in the County.

5. Meath County Council through the Meath PPN connects to and engages with the community, voluntary, social inclusion and environmental sectors. Section 6.1 refers.

6 & 7 . In terms of social inclusion , the Draft Plan aims to ensure that social inclusion and community participation continues to underpin all policies and objectives pursued. Section 7.6 Social Inclusion is of relevance in this regard. Housing Strategy Policies which promote social integration, range of dwelling types, as well as accommodation for older people (in line with Age Friendly Strategy 2017-2020 , for people with disabilities, as well as traveller accommodation is also included (SH POL 4-6). There also a number of supporting policies and objectives set out in Volume 2 which relates to the individual settlements. The principles of universal design are also supported (SH POL 7 refers).

8. This observation is noted and welcomed. It is considered that as new employment sites are developed across the country that the manner in which people travel to these sites are considered. In this regard it is noted that as part of the Draft Plan ED POL 11 and DM OBJ 106 require the submission of Mobility Management Plans as part of applications for all new developments with over 100 employees. In this regard, it is considered that this matter has been adequately addressed as part of the Draft Plan.

9. The merit in referring applications with smoking areas can be considered as part of the DM process.

10. Addressing the use of alcohol and peoples relationship with such substances is an important matter related to national health. The matter of alcohol sponsorship, however, is not a matter to be addressed as part of the preparation of a development plan. In relation to the provision of alcohol -free venues it is again noted that this is outside of the control of planning and is not a matter to be addressed in the development plan. The provision of a licence is subject to the discretion of the high court and providing a policy require alcohol-free venues as part of the development plan could be considered inappropriate.

11. It is a key focus of the Draft Plan to prioritise public transport, walking and cycling and to improve the modal split within the County. This includes commitments to the provision of additional public transport infrastructure, walking and cycling infrastructure.

It should also be noted that the Transportation Department of Meath County Council have worked with the NTA to secure baseline figures of modal splits in the larger towns of Drogheda, Ashbourne, Dunshaughlin, Dunboyne, Ratoath, Navan and Kells. Having regard to variables such as funding and resources, Meath County Council have set targets to increase shift the modal split in these towns in favour of more sustainable forms of movement. It is hoped that these changes can be achieved within the lifetime of the Plan.

12. The Urban Design Manual is supported under SH POL 8 of the Draft Plan and the 12 key principles are identified in 11.7.1 Urban Design in Chapter 11 of the Draft Plan. Design Statement

must demonstrate how the 12 urban design criteria have been taken into account when designing schemes in urban area.

13. The detailed designed proposals for parks can be considered as part of the DM process and any relevant Part 8 planning applications.

14 Comments raised are noted.

15. Support for the delivery of the Navan Rail Line is noted and welcomed.

16 & 17. Transport points raised in 16 and 17 are noted but they are outside the strategic land use function of the Draft Plan.

18. The Draft Plan is consistent with the targets outlined in Smarter Travel – A Sustainable Transport Future – A New Transport Policy for Ireland, 2009-2020.

19. The Draft Plan will ensure that Waste management policy is predicated on the EU Waste Hierarchy of prevention, preparing for reuse, recycling, energy recovery and sustainable disposal and is carried out in accordance with the Waste Framework Directive-European Commission-2008/98/EC.

20. Meath County Council with work with Irish Water to ensure the safety and conservation of drinking water and wastewater. This is adequately supported in INF POL 7, INF POL 8, INF OBJ 12 and INF OBJ 13 of the Draft Plan.

21. Comments in relation to the integration of climate change measures into the planning of new projects and their design are noted. The Climate Change Chapter contains a range of climate related policies and objectives, and where relevant, will be assessed against any project proposal with a view to ensuring all development application proposals are consistent with the policies and objectives of the County Development Plan.

22. The issue of noise sensitive uses is dealt with in Section 12 and Section 6.2 of the Draft Plan which addresses the issue of noise sensitive developments in proximity Dublin Airport and proximity to National Roads. Please refer to response to TII for further detail on noise sensitive uses in proximity to National Roads.

23. Monitoring and collation of air quality and greenhouse gas monitoring data is carried out by the EPA and supported by Meath County Council. Chapter 10 on Climate Change sets out a range of policies and objectives in the Draft Plan which should serve to reduce transport-based emissions, reduce fossil fuel usage in existing and future building stock and increase the use of renewable energy thereby reducing the use of fossil fuel usage in heat generation.

24. The Draft Plan contains a suite of policies to support water management in line with the relevant statutory guidance. The Draft Plan also strongly supports 'Sustainable Urban Drainage Systems' (SuDS) measures which are effective technologies that aim to reduce flood risk, improve water quality and enhance biodiversity and amenity.

25. This comments are noted.

26 and 27. These comments are noted.

Some of the issues raised in this submission are beyond the scope of the strategic land use function of the Development Plan. Other issues are local issues which may more appropriately be

addressed as part of the LAP process (though public consultation) or at Municipal District level. However, the Council will continue to work closely with the HSE to understand the enablers, barriers and constraints involved in creating healthy urban environments and to co-create solutions together with the community.

#### **Chief Executive's Recommendation**

No change recommended.

<b>Submission No.:</b>	MH-C5-166
<b>Submitted by:</b>	Royal Tara Golf Club
<b>Submission Theme(s):</b>	Chapter 7 Community Building Strategy
<b>Summary of Submission:</b>	
<ul style="list-style-type: none"> <li>• This submission outlines the background to the club and the recent decline in memberships.</li> <li>• It refers to a long-term Strategic Plan which was prepared for the Club which highlights the need for the club to diversify and recommended the development of a par 3 golf course on the existing Bellinter 9, tennis courts and a small scale gym facility,</li> <li>• It is requested that the policy objectives contained in the Development Plan be amended to express specific support for the development of an integrated Sports facility at this location in line with that outlined above.</li> <li>• In addition, it is considered that specific policy support is warranted for the Golf Industry and that such a policy could be applied to all Golf Clubs in the County.</li> </ul>	
<b>Chief Executive's Response</b>	
<p>Golf clubs are permitted uses in 'RA Rural Areas' and recreational facilities are open for consideration. The development of a par 3 golf course and the provision of additional sport facilities at this location are therefore more appropriately assessed through the Development Management process. No change in zoning or policy support is necessary or considered appropriate in this regard.</p> <p>There are also a number of policies set out in the Plan that provide for appropriate support for sport and leisure facilities throughout the County (Section 7.7.6 refers) and it is considered unnecessary and to provide a specific policy for the Golf Industry in this regard.</p>	
<b>Chief Executive's Recommendation</b>	
No change recommended.	

<b>Submission No.(s):</b>	MH-C5-174
<b>Submission by:</b>	Karen Lynch
<b>Submission Theme(s):</b>	Chapter 7 Community Building Strategy
<b>Summary of Submission:</b>	
<ul style="list-style-type: none"> <li>• This submission refers to Playmates Montessori Preschool and outlines the service that it provides.</li> <li>• It does not specify the location of the preschool.</li> </ul>	
<b>Chief Executive's Response</b>	

Observations made are noted. Policy support is provided for early childhood education facilities within the Draft Plan. Section 7.7.3.3. and SOC PL 20 refers. The Council also engages with Meath County Childcare Committee in this regard.

#### **Chief Executive's Recommendation**

No change required.

<b>Submission No.(s):</b>	MH-C5-713
<b>Submission by:</b>	PPN
<b>Submission Theme(s):</b>	Multiple Chapters

#### **Summary of Submission:**

- This submission requests that the Draft Well Being Vision for County Meath and all supporting documentation proposed by the PPN be considered in the CDP. A number of supporting documents were submitted as part of the submission including:

1. The County Meath Draft Overall Vision of Community Well Being
  - Ashbourne Draft Community Wellbeing Vision
  - Kells Draft MD Vision For
  - 1. County Meath draft Overall Vision for Community Well Being
  - I. Ashbourne Draft Community Wellbeing Vision
  - II. Kells DRAFT MD Vision for Community Wellbeing
  - III. Laytown-Bettystown Draft Community Wellbeing Vision
  - IV. Navan Draft Community Wellbeing Vision
  - V. Ratoath DRAFT MD Vision for Community Wellbeing
  - VI. Trim Draft Community Wellbeing Vision
2. Input Documents
  - I. Ashbourne-MD-Community-Wellbeing-Workshop-Inputs-
  - II. Kells-MD-WBVS-Inputs-7.1.20-final-1
  - III. Laytown-MD-Community-Wellbeing-Workshop-Inputs
  - IV. Navan-MD-Community-Wellbeing-Workshop-Inputs
  - V. Ratoath-MD-Community-Wellbeing-Workshop-Inputs
  - VI. Trim-MD-WBVS-Workshop-Input-Report-14.1.20-final
3. Observation 1 for insertion into the CDP Section 7.6.1 Community Participation
4. Observation 2: Well Being Vision Statement & CDP Excel Spreadsheet

The submission outlines in detail the role of the PPN as the link through which the Council connects and engages with the community, voluntary, social inclusion and environmental sectors Countywide, for consultation and information sharing.

The above referenced resources are submitted so that the individual strategies within the CDP are implemented in alignment with the identified community needs. The spreadsheet report collates the vision statements and itemises the community needs as contained within each of the 6 MD areas.

#### **Chief Executive's Response**

The Draft Plan recognises the considerable and positive role the community and voluntary sector

has always played in promoting community development in the County. The importance of the Meath PPN as the link through which the Council connects to and engages with the community, voluntary, social inclusion and environmental sectors Countywide, for consultation and information sharing is also recognised. Section 6.1 refers. The Council is fully committed to this collaborative partnership approach. SOC POL 2 is also of relevance in this regard:

*SOC POL 2 'To support the provision and distribution of community infrastructure facilitates in accordance with the Settlement and Core Strategies to meet the needs of the County's population in conjunction with other statutory, voluntary, private sector and community groups.*

The Development Plan further facilitates initiatives advocated by the PPN through promoting good placemaking, for example by ensuring new developments are designed with good connectivity and permeability for all.

Social inclusion is a cross cutting theme within the Development Plan. The Plan has been proofed to ensure it has a strong social inclusion and community participation focus with regard to the identified target populations. The Plan aims to ensure that social inclusion and community participation continues to underpin all policies and objectives pursued. Section 7.6 Social Inclusion is of particular relevance in this regard. There are also a number of supporting policies and objectives set out in Volume 2 which relates to the individual settlements.

The detail proposals set out in the submission for the relevant MD settlements are also noted. However, some of the issues raised are beyond the scope of the strategic land use function of the Development Plan. Many are local issues which may more appropriate be addressed as part of the LAP process (though public consultation) or at Municipal District level.

#### **Chief Executive's Recommendation**

No change recommended.

<b>Submission No.(s):</b>	MH-C5-824
<b>Submission by:</b>	Department of Education and Skills
<b>Submission Theme(s):</b>	Chapter 5 Movement Strategy Chapter 6 Infrastructure Strategy Chapter 7 Community Building Strategy Chapter 11 Development Management Standards and Land Use Zoning Objectives
<b>Summary of Submission:</b>	
A submission was received from the Department of Education and Skills which highlights the additional primary and post primary requirements for the County. This submission makes observations on education requirements in the context of projected population growth in the County to 2031.	
The following observations are made with respect to the Large and Small towns. Points 19-21 relate to technical issues pertaining to Chapters 6 and 11.	
1. Ashbourne	
<ul style="list-style-type: none"> <li>ASH OBJ 19 welcomed. It is intended to deliver permanent accommodation for the new</li> </ul>	



primary school referenced in this objective(Ashbourne Community National School) on lands in the ownership of the Minister for Education and Skills at Killegland.

- Longer term requirement for post primary accommodation in Ashbourne. There is sufficient capacity on the existing Minister owned land at Killegland should one be required.
- Should population growth exceed the 2031 projections, there is possibility of further school requirement and the Council is requested to consider the potential necessity for further sites should this scenario arise.

## 2. Athboy

- Sufficient capacity in the current schools to meet the potential requirements allowing for some population growth beyond that projected.
- Even if significant additional population were to occur it is not expected that the zoning of additional lands for a school site would be required over the lifetime of this Plan.
- A portion of the Athboy Community school site is outside the settlement boundary. It is requested that the settlement boundary be amended to reflect this and that the subject lands are designated for Community Infrastructure Use.

## 3. Duleek

- Projected increase in school place requirements can be met at existing schools.
- Duleek is contained within the Drogheda School Planning Area. A new post primary school to serve the Laytown and Drogheda School Planning Areas opened in 2019 and this is expected to have sufficient capacity to absorb any additional post primary school place requirements which may emerge in Duleek. Emerging post primary school place requirements in the School Planning Area will continue to be kept under review.

## 4. Dunboyne and Clonee

- Significant capital investment in education infrastructure in Dunboyne has been committed by the DoES.
- Should projected population materialise or be exceeded there would be additional school accommodation requirements at both primary and post primary level. (sufficient G1 zoning). In addition, a project to provide permanent accommodation for Dunboyne College of Further Education is included in the DoS capital programme and a site is required to facilitate such a project. DCE OBJ 10 and DCE OBJ 11 are welcomed in the context of potential requirements referenced above.
- Reference is made to the Community Infrastructure zoned land proximate to the rail station at Dunboyne North (GUID 913) and a number of issues were highlighted. In this regard it is requested that the following scenarios are considered a) The extent of zoned lands should be expanded by 1.1 ha. Any additional G1 lands should be located away from lands prone to flooding or the provision of education use playing pitches and courts should be facilitated in the F1 Open Space zoning category.

## 5. Dunshaughlin

- A new primary school is opening in 2020 and it is intended to deliver permanent accommodation for this school on lands adjacent to 'the Willows' residential development. The DoES strongly welcomes the proposed zoning of this lands as Community Infrastructure. It is expected that this school will have sufficient capacity to absorb additional primary

school place requirements over and beyond the lifetime of the Plan

- The proposed site for Dunshaughlin CNS is of sufficient size to facilitate potential future post primary accommodation provision. DNS OBJ 012 is supported in this context.

#### 6. East Meath

- Sufficient capacity at primary school level should the projected population materialise over the lifetime of the Plan.
- The new post primary school to serve the Laytown and Drogheda School Planning Area and the additional capacity which is planned for the Franciscan College in Gormanston has sufficient capacity to absorb any additional post primary requirements that may emerge over the lifetime of the Development Plan.

#### 7. Enfield

- A new post primary school is opening in 2020 and ENF OBJ 17 is welcomed in this regard. The proposed zoning of this land as Community Infrastructure /Mixed Use is strongly welcomed.
- It is anticipated that the new school will absorb any additional post primary school place requirements.
- The full extent of Community Zoning is welcomed as it may facilitate an additional primary school accommodation should a significant increase in population in the settlement generate a requirement for additional primary school places. (An analyse is required to be carried out by the DoES in this regard.)

#### 8. Kells

- DoES welcomes KEL OBJ 26 in its support for appropriate provision for additional education facilities in advance of residential population growth.
- The projected increase in population in the settlement, should it materialise or be exceeded, may possible generate a requirement for primary school places in excess of what could be facilitated at the existing schools. The DoES wishes to engage with MCC through the Kells LAP process in this regard.
- Post Primary capacity is considered sufficient to meet the potential post primary school requirements.
- Reference is made to a portion of St. Ciaran's Community School Site which is proposed to be zoned F1 Open Space. It is requested that the full extent of the site is zoned for G1 use in order to best protect the states assets and fully support any future development of the school.

#### 9. Kilcock Environs

- Requests MCC reinstate an objective relating to the provision of a 1.6ha primary school within the Kilcock Environs Written statement.
- Post Primary requirements will be considered in the context of the town as a whole as part of the LAP.

#### 10. Longwood

- Sufficient capacity available to meet the demand which may materialise.

#### 11. Maynooth Environs

- A project to deliver 2 no. post primary school buildings on a site at Moyglare is underway. A new Gaelcholaiste is opening in the settlement in 2020. It is planned to deliver permanent accommodation for a newly opened Gaelscoil on the post primary campus at Moyglare.
- Given the towns status and location within the Dublin metropolitan area, a more thorough analysis will be carried out in conjunction with both Meath and Kildare County Councils as part of the preparation of the joint LAP.

#### 12. Navan

- Significant primary and post primary school requirements may arise should potential population materialise. (reference is made to Clonmaggaden SDZ )
- While there is substantial current capacity at primary school level, additional facilities may be required.
- Planned projects at existing primary schools may provide capacity to absorb some or all of this potential demand at post primary school level.
- The planned Navan LAP process will provide the DoES and MCC an opportunity to review requirements and ensure adequate provision for school requirements is in Navan place.
- NAV OBJ 26 and NAV OBJ 37 are welcomed by the DoES.

#### 13. Nobber

- Sufficient capacity in the existing schools to meet the demand which may materialise.

#### 14. Oldcastle

- Should the projected population increase materialise there may be additional school place requirements. However, this is not expected to require the zoning of additional lands for educational purposes.

#### 15. Ratoath

- Additional primary school places in excess of what could be facilitated at existing schools may be required and subject to a more robust analysis of current or potential capacity at existing schools. In this context the DoES refers to the Community Infrastructure zoned land adjacent to Ratoath College.
- A post primary school level, there does not appear to be a requirement to identify additional lands for educational purposes. This will however be reviewed as part of the LAP process.

#### 16. South Drogheda

- The Joint Vision and Urban Area Plan will provide the DoES the optimum opportunity for to consider educational requirements in the settlement.
- Drogheda and Laytown Educate Together Secondary School, which opened in 2019, is intended to be permanently located in south Drogheda. Should additional post primary

requirements emerge it is expected that these could be provided for at this school.

- A specific objective in the Plan which explicitly supports the delivery of this post primary school in south Drogheda would be welcomed by the DoES.
- More robust analysis by the DoES in terms of primary school levels is required however, the quantum of land currently zoned as community Infrastructure Use is noted.

#### 17. Stamullen

- Should the projected population increase materialise there may be additional primary school place requirements. However, it is not expected that this would require the zoning of additional lands for educational purposes.
- Stamullen is contained within the Layown School Planning area. There is sufficient capacity at post primary level to absorb the potential requirements that may emerge should the projected population increase materialise.

#### 18. Trim

- The Department currently has plans to deliver additional capacity for Trim ETNS at a property in the town centre, at Boyne Community School at its current location and at Scoil Mhuire on a new site, yet to be selected. Explicit support in the Plan for all three projects would be welcomed.
- In particular, the DoES would welcome a specific objective for the provision of post primary and primary school accommodation on a Community Infrastructure site in Trim, to meet the current requirement for Scoil Mhuire and potential future primary school accommodation requirements. A site of circa 15 acres should be identified for a campus solution, unless off site facilities such as a playing pitch are proximate.
- In addition, it is noted that a portion of Boyne Community School site, is proposed to remain F1. It is requested that the full extent of this property be zoned as Community Infrastructure to support the planned and potential future development of the school.
- The Department supports the proposal in the Draft Plan to extend the G1 Community Infrastructure zoning in Manorland. Provision should be left for a minimum 50m offset from the proposed new junction with the new road and any new entrance off the R161 to these zoned lands. Moving the proposed new road west will allow a more regularised plot of land which may facilitate the potential development of school facilities at this location. Map submitted in support of this.

#### 19. Site Suitability

- Submission refers to 2 technical guidance documents which provide guidance in relation to site suitability for educational provision. Namely:
  - Identification and Suitability Assessment of Sites for Primary Schools and Technical Guidance Document
  - Identification and Suitability Assessment of Sites for Post Primary Schools.

#### 20. Chapter 6 Infrastructure Strategy

- Refers to Inf OBJ 27: To encourage the use of Green Roof technology particularly on apartment, commercial, leisure and educational buildings. It is requested in the interests of teaching and learning, in the interest of not reducing the viability of rain water harvesting in schools and in the interest of not imposing unnecessary maintenance and operational costs

on schools that all educational buildings be specifically excluded from the requirement to use Green Roof Technology and that INF OBJ 27 be modified accordingly.

## 21. Chapter 11 Development Management Standards and Land Use Zoning Objectives

- Reference is made to section 11.7.6 which refers to Separation Distances. It is stated that the Department has experienced significant project delay where the residential separation distances appear to be the default. The DoES requests that this section is explicitly cross-referenced to DM OBJ 33 under building heights and includes some clear guidance on the relationship of community infrastructure proximity. (separation distance, overshadowing etc).
- Reference is made to DM POL 13 and DM OBJ 56-57. The DoES requests that there are some guidelines, relaxation, or process for consideration whereby schools and education projects may cross over in DM policy areas. It is also requested, all else being equal, that as community infrastructure the quality and performance of the schools should be given primacy.
- The Dept. welcomes the provisions in terms of Student Accommodation and acknowledges the DM POL 17 and Objective DM OBJ 75-78.
- Reference is made to Section 11.9.3 which relates to Education provisions. Particular reference is made to DM OBJ 140 which relates to school extensions and requires satisfactory integration with existing structure and school extensions should not negatively impact on adjoining amenities within the school site. The DoES requests a relaxation on these points, with the exception of bad design options, that the Department should be the arbiter on the reasonable and relative prioritisation of amenities versus facilities and educational spaces within schools.
- Reference is made to Section 9.11.11.1 Parking Standards table 11.4 Car Parking.
- It is noted that the draft plan seeks to provide '3 per classroom plus dedicated pick up/set down area within the site boundary'. The department considers that this is excessive and seeks a reduction downwards. The proposed level of spaces is considered contrary to the stated policies of compact and centralised development, sustainable transport modes and in addition consumes expensive land area that could better be used for other facilities. From an education point of view, it is considered that this is the most single disconnect between the climate change, transport and compact settlement policies within the Draft Plan. The DoES sees the static car parking requirement as being in difference in their requirement to the drop off/set down facilities for peak traffic at school start and end. In addition, it is noted that the Department proactively cooperates with DM OBJ 142- the provision and implementation of Mobility Management Plans as part of all school projects.
- 11.11.3 Cycle Parking is referenced. The parking standards are noted as being high, but is considered acceptable in terms of the trade off against car transport/parking and in support of increased modal share.

The submission concludes by welcoming the ongoing engagement with MCC and states that they will continue to work closely with the Council in relation to the provision of new schools and the development of existing schools. It also emphasises the critical importance of the ongoing work of the

Council in ensuring sufficient and appropriate land is zoned for this purpose.

### **Chief Executive's Response**

The submission from the Department of Education and Skills is welcomed. Educational Facilities have an important role to play in developing sustainable and balanced communities as well as encouraging families to live in the County. As stated in the Draft Plan, the Council will continue to work closely and liaise with the Department of Education and Skills to identify and procure school sites where a shortfall in school places is identified. This consultation will be most useful for the Forward Planning Section and will inform the review of the Local Area Plans.

#### **1. Ashbourne**

Observations raised are noted and educational provision will be explored further as part of the LAP process.

#### **2. Athboy**

The issue raised with regard to the lands in the ownership of the Minister of Education and Skills adjacent to Athboy Community school site is noted. To allow for the orderly expansion of the school site if required in the future, the CE recognises the merit of extending the G1 lands at this location to include the subject lands. Following a technical examination the subject lands are conducive to a G1 'Community Infrastructure' zoning objective.

#### **3. Duleek**

Issues raised are noted. Educational provision will be further explored as part of the preparation of the Duleek LAP.

#### **4. Dunboyne and Clonee**

Observations made are noted and educational provision in Dunboyne and Clonee will be explored further as part of the preparation of the LAP process.

#### **5. Dunshaughlin**

Observations are noted. Educational provision in Dunshaughlin will be explored further as part of the preparation of the Dunshaughlin LAP.

#### **6. East Meath County Council**

Observations are noted. Educational provision in East Meath will be explored further as part of the preparation of the LAP process.

#### **7. Enfield**

Observations are noted. Educational provision in Enfield will be explored further as part of the preparation of the LAP process.

#### **8. Kells**

Observations are noted and will be explored further as part of the LAP process.

With respect St. Ciaran's Community College, it is noted that the majority of the site is zoned for G1 community infrastructure. A triangular shaped piece of land to the southwest of the site is zoned for F1 open space which is referred to in the submission. The Council recognises the merit in rezoning the subject lands from F1 to G1 to allow for the orderly expansion of the school if required over the lifetime of the Development Plan or beyond. The subject lands are considered suitable for G1 'Community Infrastructure' zoning objective, are not located within an identified flood zoned or subject to any cultural or natural heritage designations.

9. Kilcock Environs

Observations are noted. It is considered appropriate to reinstate the objective to provide a primary school in the Kilcock Environs Written Statement as requested.

10. Longwood

Observations are noted.

11. Maynooth Environs

Observations are noted. Education provision in Maynooth environs will be explored further as part of the preparation of the Maynooth LAP in conjunction with the DoES and Kildare County Council.

12. Navan

Observations are noted. Further consideration will be given to Education provision in Navan as part of the preparation of the Navan LAP in consultation with the DoES.

13. Nobber

Observations are noted.

14. Oldcastle

Observations are noted.

15. Ratoath

Observations are noted. Education provision in Ratoath will be examined further as part of the preparation of the Ratoath LAP

16. South Drogheda

Observations are noted. Education provision in Drogheda environs will be explored further as part of the preparation of the LAP in conjunction with the DoES and Louth County Council.

17. Stamullen

Observations are noted. Further consideration will be given to education provision in Stamullen as part of the preparation of the Stamullen LAP.

18. Trim

Observations are noted. Further consideration of education provision in Trim and consultation with the DoES will take place as part of the Trim Local Area Plan. The intentions of the DoES with regard to the provision of additional capacity for Trim ENTS are noted. Various potential locations are referenced. It is considered that this matter can be explored further as part of the Trim LAP process.

With regard to the request for a n objective for the provision of primary and post primary accommodation on Community Schools, it is considered appropriate to include a specific objective as requested on lands identified for G1 'Community Infrastructure Use' on the Dublin Road to reserve 15 acres for the provision of such facilities to meet the current and future education needs of Trim over the lifetime of the Development Plan. It is noteworthy that these lands were previously identified for educational purposes but this objective was removed as it was no longer considered a requirement of the DoES. However, given the current change in circumstances, and the identified demand with regard to educational provision in the town, it is considered prudent to reinstate this objective.

The rezoning of the playing pitches associated with Boyne Community Schools from F1 to G1 use can



be given further consideration further as part of the Trim LAP process.

It should be noted that the road traversing the G1 Community Zoning is indicative only and would be the subject of a Part 8 Application or form part of a future planning application which will consider the final layout and design of the road in greater detail. The feasibility and specific route of the road will also be considered at a more in-depth level during the preparation of the Trim Local Area Plan.

#### 18. Chapter 6

This issue can be appropriately considered through the DM process.

#### 19. Chapter 11 – Comments noted

- Appropriate separation distance is a key consideration in the assessment of prospective developments. The standards of the draft CDP are adhered to in Section 28 guidelines and relaxation of same will be considered on a case by case basis. In this context, the development type, fenestration and suitable boundary treatment will be sought to ensure the privacy and amenity neighbouring properties.
- DM POL 13 refers to light and overshadowing, this requires that all new residential development should be designed to maximise the use of natural daylight and sunlight. Innovative building design and layout that demonstrates a high level of energy conservation, energy efficient and use o renewable energy sources.
- In relation to DM OBJ 56 & DM OBJ 57 it should be noted that the DM chapter of the draft CDP has been simplified however it should be noted that typically, daylight and sunlight levels should generally be in accordance with; Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice (B.R 209, 2011).
- MCC note the DoES support in relation to DM POL 17 and DM OBJ 75-78.
- In relation to DM OBJ 140 which requires that extensions to schools will generally be accepted subject to scale, high quality design and integration with the existing structure. It is considered that these typical requirements and that the principle of development for this is generally acceptable. Specific design considerations, materials, provision of amenity space etc will be assessed in detail at application stage.
- Parking provision is a consideration for development stage in the assessment of a specific planning application.

#### 20. Other Technical Issues

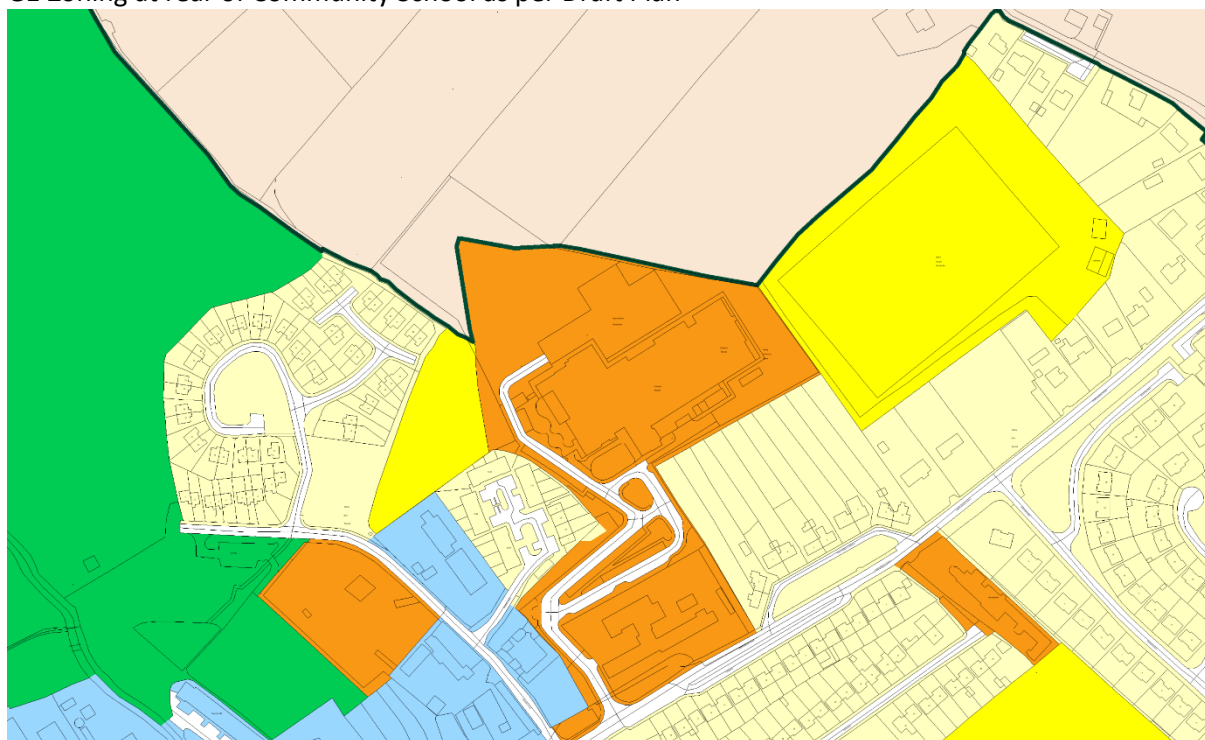
In the interests of the Council's commitment to climate change and in accordance with Section 10 (2)(n) of The Planning and Development Act 2000 (as amended), it is deemed inappropriate to remove 'educational buildings' from INF OBJ 27 which would dilute the principal of supporting the roll-out of green roof technology across a range of uses would be appropriate for energy-efficient technologies. There is no reasonable justification for the removal of educational buildings form this objective.

### **Chief Executive's Recommendation**

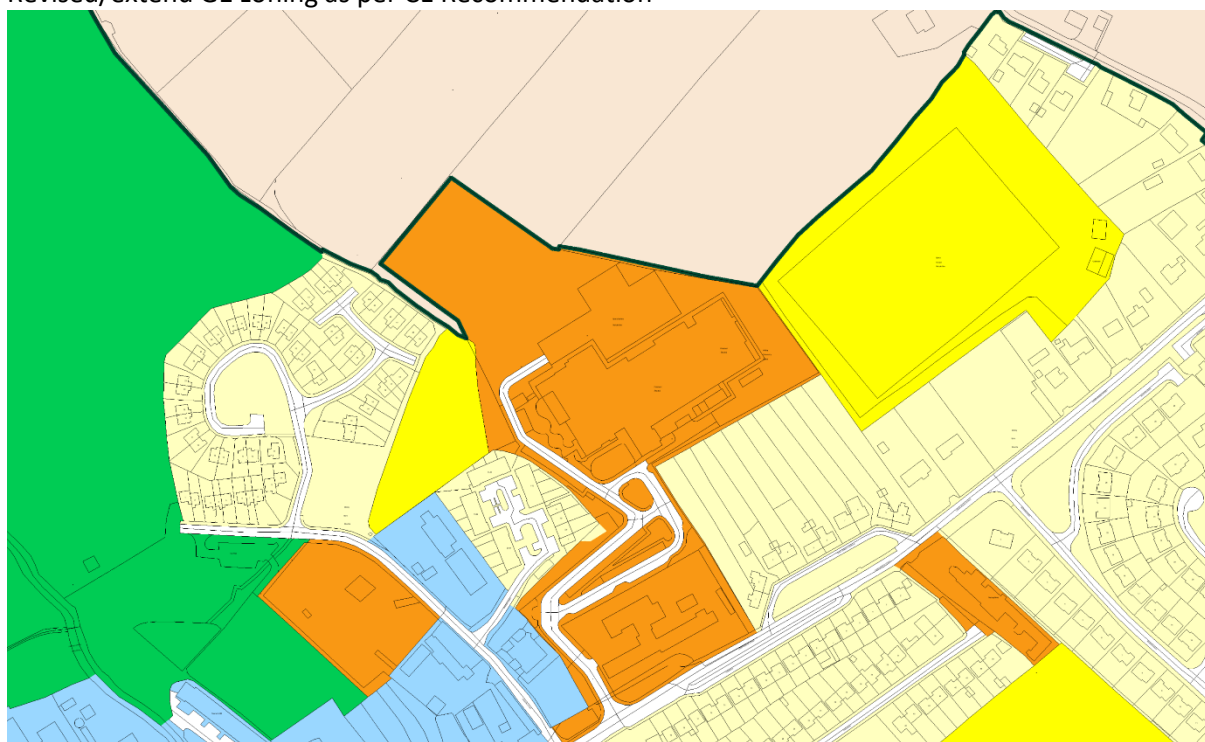
#### **1. Amend Athboy Land Use Zoning Map**

- Extend development boundary to include lands adjacent to Athboy Community School and amend the zoning objective on the subject lands from RA 'Rural Areas' to G1 'Community Infrastructure' objective.

G1 Zoning at rear of Community School as per Draft Plan



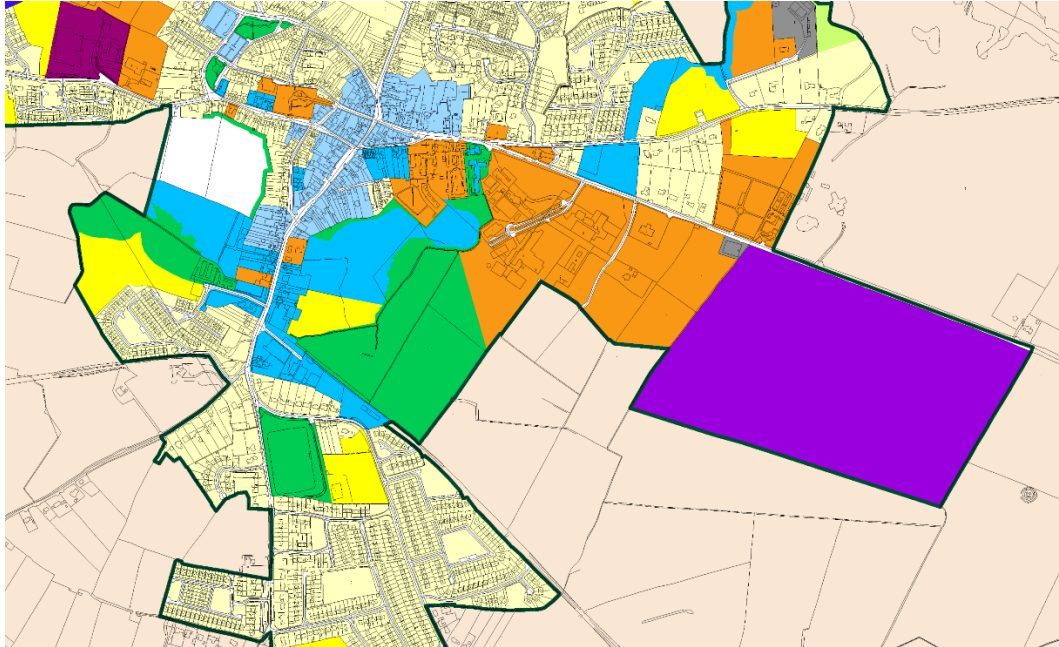
Revised/extend G1 zoning as per CE Recommendation



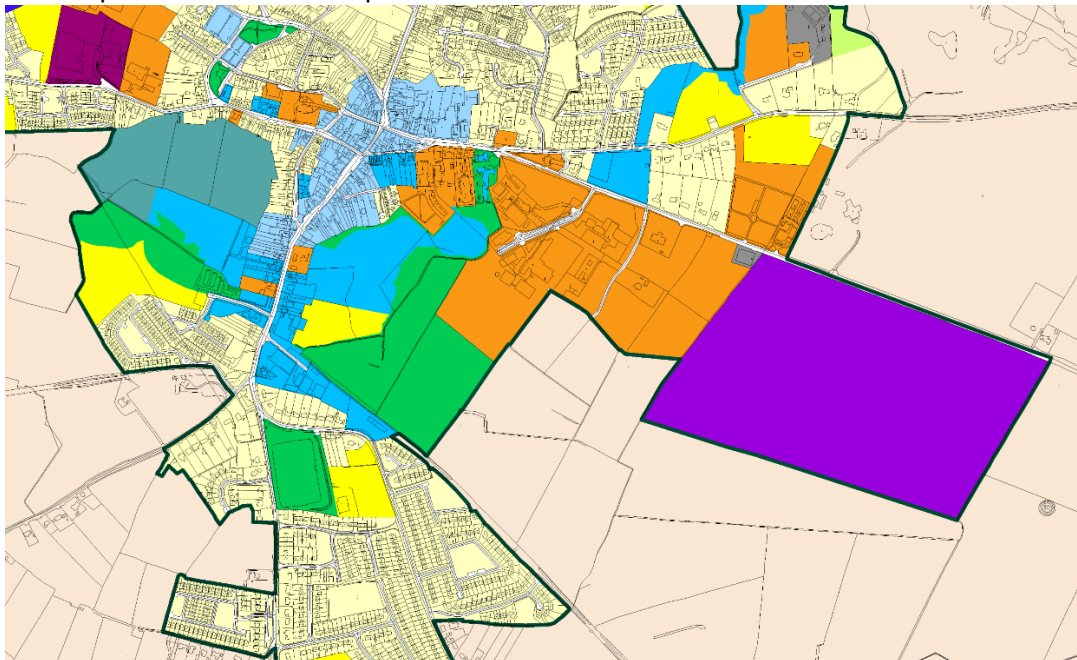
## 2. Kells Land Use Zoning Map

- Rezone triangular shaped lands to the south west of St. Ciaran's Community College from F1 'Open Space' to G1 'Community Infrastructure'

G1 and F1 Zonings at rear of Community School as per Draft Plan



Rezone portion of F1 to G1 as per CE's Recommendation.



### 3. Volume 2, Kilcock Written statement

- Insert the following additional objective:

#### Social

**KIL OBJ 10 To support the development of a primary school in Kilcock Environs to meet the primary educational needs of the settlement.**

### 4. Volume 2, Trim Written Statement

Section 12.0 Social Infrastructure (insert the following text at the end of third paragraph.)

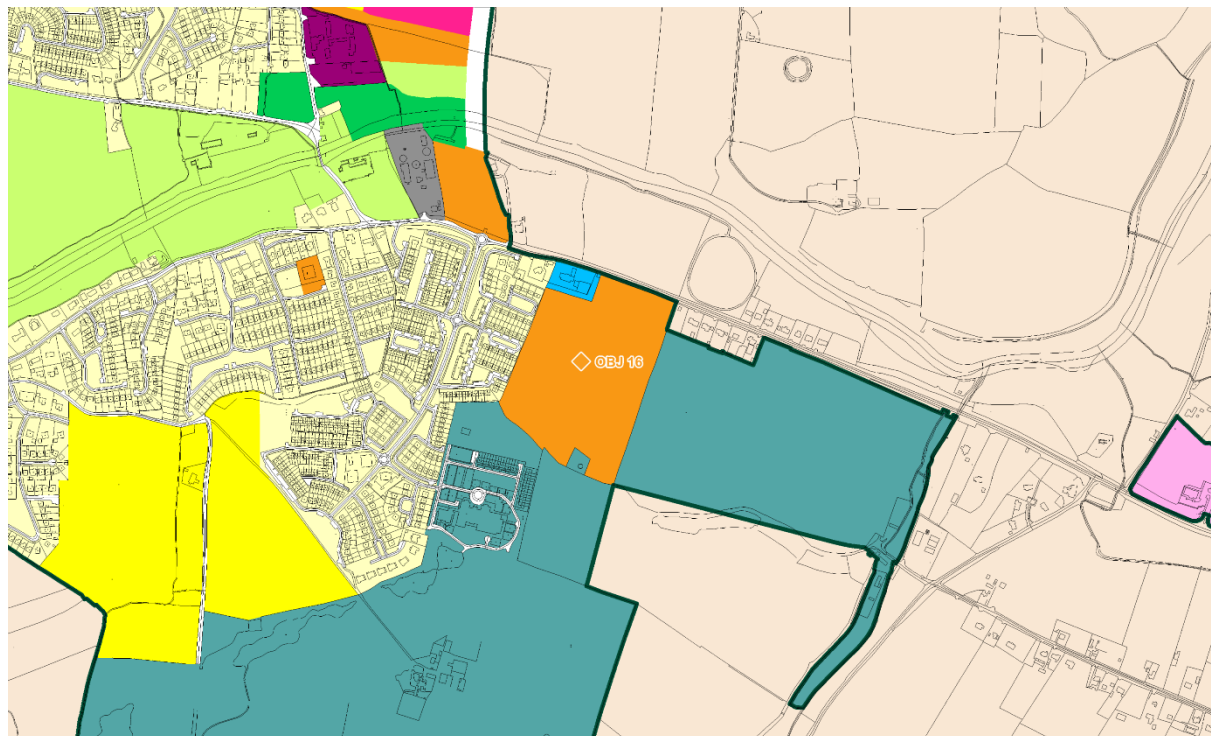
**However, the Department of Education and Skills has identified the need for the provision of additional primary and post primary school accommodation in the town and requested that a site 15 acres in area is reserved for educational purposes. Lands on the R154 Dublin Road, zoned for G1 use are considered suitable to meet the future educational need for Trim in this regard.**

Insert the following additional objective: (renumber remaining objectives)

**Trim OBJ 16: To support the development of a primary and secondary school in Trim in a campus style development on a site 15 acres in area to meet the educational needs of the residents of the town and its catchment.**

### 5. Trim Land Use Zoning Map

Illustrate OBJ 16 on lands zoned for G1 'Community Infrastructure' on the R154 Road Dublin Road for educational facilities as per point no. 4 above.



### 6. Volume 1, Chapter 7, Section 7.7.3.1 Additional Primary and Post Primary Educational Requirements

- Include reference to additional primary school facilities in Kilcock Environs and Trim and



reference to additional post primary and third level facilities in Trim as follows:

‘A new primary school in Ashbourne, Navan, Dunboyne, Dunshaughlin, ~~and~~ Ratoath, **Trim and Kilcock Environs**.

A new post primary school in Drogheda environs, Ashbourne, Navan, Dunboyne, Enfield, **Trim** and Ratoath.’

<b>Submission No.(s):</b>	MH-C5-839
<b>Submission by:</b>	Age Friendly Ireland and Meath Age Friendly Programme
<b>Submission Theme(s):</b>	Chapter 7 Community Building Strategy
<b>Summary of Submission:</b>	
<ul style="list-style-type: none"> <li>This submission notes that while the Draft Plan includes reference to Age Friendly planning and housing, a specific note on designing and planning communities for the growing proportion of people with dementia in society is requested.</li> <li>Reference is made to a walkability project which was carried out in Athboy town last year. The findings of this study were attached as part of the submission.</li> </ul>	
<b>Chief Executive's Response</b>	
<p>Chapters 3 and 7 of the Draft Plan 2016-2022 already include a series of policies and objectives which supports the creation of inclusive communities for Older People and for people with disabilities throughout the County. (7.6.2.2 and 7.6.2.3 refer.) The Housing Strategy includes policies which promote social integration, range of dwelling types, as well as accommodation for older people (in line with Age Friendly Strategy 2017-2020) and for people with disabilities. The principles of universal design are also supported. (Sections 3.8.8, 3.8.8.1 refers)</p> <p>The aforementioned policies are therefore considered sufficient to support to the needs of people with dementia. It is not considered appropriate or necessary to specifically reference this population group.</p>	
<b>Chief Executive's Recommendation</b>	
No change recommended.	

<b>Submission No.(s):</b>	MH-C5-862
<b>Submission by:</b>	Helen McEntee
<b>Submission Theme(s):</b>	Chapter 7 Community Building Strategy Chapter 5 Movement Strategy Chapter 8 Cultural and Natural Heritage Strategy Chapter 9 Rural Development Strategy
<b>Summary of Submission:</b>	
<p>1. Education</p> <ul style="list-style-type: none"> <li>This submission refers to Education in particular the need for a new purpose-built building and campus for Dunboyne PLC identified in the Dunboyne Area.</li> </ul>	

- Requests that where required, additional sites be identified for future educational needs of children at primary and post primary level.

## 2. Amenities for younger population

- That full consideration be given to the development of lands suitable for public amenities for young people, and where possible that buildings be identified for specific youth purposes.

## 3. Infrastructure

- In line with the NDP, priority is given to the development and upgrading of the N2 in particular the N2 Rath Roundabout to Kilmoon Cross.

## 4. Slane Bypass

- Requests that as a matter of urgency and public safety that this project is progressed and brought to planning as soon as possible.

## 5. Navan Rail Line

- That Meath County Council make the best possible case for the extension of the rail line from Dunboyne to Navan.

## 6. Concern is expressed in relation to the rural one off and rural node housing policy in particular:

- The impact on future generations.
- The value of land parcels below 25 acres.
- The restrictive policy on those who move away from the area for a number of years.

## 7. Brú na Boinne

- The Development plan must acknowledge the local community's right to sustainable socio-economic growth and development and therefore must provide for reasonable development of residences, business and social amenities while recognising the protection of the OUV. The Development Plan must completely discard the provisions of the existing CDP that apply specifically to the environs of the WHS and start afresh with a new approach which will enable the communities within the WHS Core and Buffer Zone to engage in sustainable development
- Reference is made to the Multi-Criteria Analysis of the issues arising in the area commissioned by the Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs. It is important that the Development Plan reflects its recommendations and reasoning when formulating policies and objectives for this area.

## Chief Executive's Response

1. In terms of education, the provision of new schools is primarily the responsibility of the Department of Education and Skills. The Development Plan makes provision for additional

educational facilities in accordance with 'A Code of Practice on the Provision of Schools and the Planning System' following detailed discussions and engagement with the Department of Education and Skills, in particular having regard to their school planning projections and the educational infrastructure needs within the Development Plan. The Council will continue to liaise with the Department of Education and Skills, LMETB and other bodies to ensure the development of schools at the optimum locations.

With regard to third level facilities in Dunboyne, the following is of note from the DoES submission (Sub no. 824):

- *A project to provide a permanent accommodation for Dunboyne College of Further Education is included in the DoS capital programme and a site is required to facilitate such a project. DCE OBJ 10 and DCE OBJ 11 are welcomed in the context of potential requirements referenced above.*

2. Adequate provision is made for facilities for young people in the Plan supported by the necessary policies and objectives. Chapter 7 Community Building Strategy refers.

3. As noted, the National Development Plan makes particular reference to and prioritises the upgrade to the N2 from Rath Roundabout to Kilmoon Cross section of road. The Draft Plan, Chapter 5, Section 5.8.3 highlights the important role of the N2 corridor. The delivery of these works will continue to be supported and facilitated by the Council and MOV OBJ 31 is set down to ensure continued support for upgrades to the N2 as follows: 'To continue to support and facilitate TII, Fingal County Council, Louth County Council and Monaghan County Council in the planning and delivery of upgrades to the N2, as appropriate'.

4. The Council will seek the delivery of the Slane Bypass in conjunction with TII and the Department of Transport, Tourism and Sport. Support for the Bypass is outlined in detail under Section 5.8.1 and in the MOV OBJ 33 and MOV POL 23 of the Draft Plan.

5. The Council remains strongly committed to the delivery of the rail to Navan and a strong policy stance is set out in the Draft Plan in support of same - MOV POL 6 refers. The detailed designed alignment reflects that prepared and advanced by Iarnród Éireann and confirmed by the NTA. It is the responsibility of the Council to protect these lands from further development through the R1 Rail Corridor objective and specific zoning objective R1 Rail Corridor which seeks 'to provide for a strategic rail corridor and associated physical infrastructure.'

6. With respect to Rural Housing, please refer to CE's Response and Recommendation outlined in grouped themed 'Rural Housing Policy' submissions. (Part 3 of Report, Grouped Themed Submission no. 1)

7. Given the international significance of Brú na Bóinne, the primary policies and objectives for the UNESCO World Heritage Site of Brú na Bóinne relate to the preservation of its Outstanding Universal Value. Meath County Council has always sought to strike a balance between the needs of the local community with our responsibility and obligation to protect the Outstanding Universal Value of the World Heritage Site. Meath County Council in preparing the Draft Development Plan reviewed the multi-criteria analysis *Brú na Bóinne: Planning for World Heritage Property (December 2018)* commissioned by the Department of Culture, Heritage and the Gaeltacht (DCHG) undertaken by Doyle Kent Ltd and have had regard to its recommendations that relate to the functions and scope of the County Development Plan specifically in relation to the following:

- **The multi criteria analysis stated that 'it is necessary to strike a balance, on the one**



*hand, between facilitating the quality of life and the sustainable growth and development of the community and, on the other hand protecting the Outstanding Universal Value of Brú na Bóinne its historic and cultural environment ...notwithstanding some imperfections in the existing system. We would not recommend a significant change to the policy in County Meath in respect of need for rural housing. We would also recommend that similar policies be adopted by County Louth for consistency' (page 37) – This guided our approach in the development of the policies and objectives in relation to the Brú na Bóinne.*

- **The report recommended that to help meet local needs an area might be designated for a cluster of housing** – The Draft Plan recognises that there is an established nucleus of development in Monknewtown area which is concentrated on the church; cemetery; athletic club; GAA pitch; transport company; and, a number of established one-off dwellings which is removed from the crossroads at the National Secondary Route, the N51, at the existing pub. This area has been designated as a rural node. It is considered that this area has a limited capacity to support the sustainable delivery of rural-generated residential development and support for small-scale employment and community facilities for members of the rural community. That said, special regard must be given to the presence of archaeological features and national monuments in the vicinity of Monknewtown; and, potential impacts upon views into Brú na Bóinne UNESCO World Heritage Site would also have to be carefully considered as Monknewtown is located within the Bru na Bóinne Buffer Zone.
- **The report recommended that the existing policy in relation to extensions and alternations be re-examined**– The existing policy was revised, and this has been reflected in the Draft Plan – See HER POL 10
- **The report acknowledged the pilot project and case studies undertaken by Meath County Council and DCHG in respect of adaptive reuse and recommends that possibilities for expansion of this scheme be considered** – This has been reflected in the Draft Plan – See HER OBJ 10
- **A Business Plan for the World Heritage Sites should be commissioned**– Support for this is reflected in the Draft Plan HER OBJ 12
- **Implementation of the Brú an Bóinne Management Plan and incorporate it into the County Development Plan** - The Management Plan is part of the County Development Plan see Appendix 8 and HER POL 11 refers
- **The report recommends to continue to protect landscape in the WHS buffer and its environs, as setting is a key indicator in analysis of authenticity** – This has been reflected in among others, HER OBJ 3, HER POL 6, HER OBJ 7, HER POL 8, HER OBJ 11 HER POL 52, HER POL 53, HER OBJ 48, HER OBJ 49, HER OBJ 55
- **Emphasise the importance of design quality as a planning consideration in relation to the WHS and environs** – This Draft Plan emphasised this and detailed planning guidance for World Heritage Site is proposed in Appendix 8 (a). The Council commits to encouraging and facilitating pre-application discussions in conjunction with the Department of Culture, Heritage and the Gaeltacht, regarding the siting and design of developments affecting the WHS – HER OBJ 8 refers
- **Pursue Greenway/Boyne Navigation** – Support for this key strategic project is reflected in the Draft Plan – (See ED OBJ 75) and Meath County Council has secured funding to advance the technical aspects of this project. A project team have been appointed to advance same in June 2020.

#### Chief Executive's Recommendation

No change recommended.
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<b>Submission No.(s):</b>	MH-C5-894
<b>Submission by:</b>	Cllr Sharon Keogan & Amanda Smith
<b>Submission Theme(s):</b>	Social Infrastructure
<b>Summary of Submission:</b>	
Where the opportunity exists for community gain that the Council will modify the existing plan to relocate the zoning to a revised zoned area where services exist.	
<b>Chief Executive's Response</b>	
<p><b>See NOM 222</b></p> <p>It is recognised that the provision of social and community infrastructure and facilities is a key element of creating an attractive, healthy, and inclusive community. In the preparation of the Draft Plan an analysis of the requirement for additional community infrastructure such as schools, parks, and libraries has been identified. In certain instances there will be a requirement that such infrastructure is to be delivered in tandem with a development. In addition, policy SOC POL 6 requires a 'Social Infrastructure Assessment' to be carried out for all residential developments in excess of 50 units in order to identify any deficits in social and community infrastructure.</p>	
<b>Chief Executive's Recommendation</b>	
No change recommended.	

<b>Submission No.(s):</b>	MH-C5-905
<b>Submission by:</b>	LMETB
<b>Submission Theme(s):</b>	Chapter 7 Community Building Strategy and Volume 2 East Meath Written Statement.
<b>Summary of Submission:</b>	
<ul style="list-style-type: none"> <li>• This submission states that approx. 15 acres of land is required to cater for future educational needs in the East Meath/ Greater Drogheda Area over the lifetime of the Plan.</li> <li>• A 1,000 student post primary school requires 10 acres, while 6 acres is the general requirement at primary school level.</li> <li>• Requests that such lands be zoned for G1 use and have adequate road frontage and services.</li> </ul>	
<b>Chief Executive's Response</b>	
<p>The submission from LMETB is welcomed. Educational Facilities have an important role to play in developing sustainable and balanced communities as well as encouraging families to live in the County. As stated in the Draft Plan the Council will continue to work closely and liaise with the Department of Education and Skills and the LMETB to identify and procure school sites where a shortfall in school places is identified. (SOC OBJ 4 refers). This consultation will be most useful for the Forward Planning Section and will inform the review of the Local Area Plans.</p> <p>Observations are noted. Education provision in the East Meath/ Greater Drogheda environs will be explored further as part of the preparation of the Drogheda Environs LAP in conjunction with LMETB, the DoES and Louth County Council and as part of the Bettystown-Laytown-Mornington</p>	

East-Donacarney LAP in conjunction with LMETB and the DoES.
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<b>Chief Executive's Recommendation</b>
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No change recommended.
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<b>Submission No.(s):</b>	MH-C5-906
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<b>Submission by:</b>	LMETB
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<b>Submission Theme(s):</b>	Chapter 7 Community Building Strategy and Volume 2 Dunboyne Written Statement.
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<b>Summary of Submission:</b>
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- This submission states that a new primary, post primary and further education facility is required to serve the needs of the Dunboyne Area over the lifetime of the Plan.
- The submission outlines the current capacity constraints at St. Peters Dunboyne and the Dunboyne College of Further Education.
- The current facilities at the Dunboyne College of Further Education are far short of what is expected at this level and it is LMETB's intention to build a new modern purpose-built facility as soon as lands are available.
- Overall a site for further education would require approx. 15 acres.
- It is submitted that this school is on the Department of Education and Skills building list so a site for this facility is urgently required.
- A 1,000-student post primary school requires 10 acres, while 6 acres is the general requirement at primary school level.
- It is hoped that approx. 25/30 acres in total would be zoned for educational needs in Dunboyne.

<b>Chief Executive's Response</b>
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The submission from LMETB is welcomed. Educational Facilities have an important role to play in developing sustainable and balanced communities as well as encouraging families to live in the County. As stated in the Draft Plan the Council will continue to work closely and liaise with the Department of Education and Skills and LMETB to identify and procure school sites where a shortfall in school places is identified. (SOC OBJ 4 refers). This consultation will be most useful for the Forward Planning Section and will inform the review of the Local Area Plans.

The observations made above are noted. Education provision in the Dunboyne Area will be explored further as part of the preparation of the Dunboyne LAP in conjunction with LMETB and the DoES.

<b>Chief Executive's Recommendation</b>
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No change recommended.
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<b>Submission No.(s):</b>	MH-C5-907
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<b>Submission by:</b>	LMETB
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<b>Submission Theme(s):</b>	Chapter 7 Community Building Strategy and Trim Written Statement.
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<b>Summary of Submission:</b>
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- This submission states that a new youthreach (3, acres) primary (6/7 acres), post primary 10/12 (acres) and further education facilities (5/6 acres) are required to serve the needs of the Trim Area over the lifetime of the Plan.
- The submission outlines the current educational constraints in Trim particularly at secondary school level.
- It is hoped that approx. 25/30 acres in total would be zoned for educational/community needs in Trim and done so in such a way as to afford adequate road frontage and services.

#### **Chief Executive's Response**

The submission from LMETB is welcomed. Educational Facilities have an important role to play in developing sustainable and balanced communities as well as encouraging families to live in the County. As stated in the Draft Plan the Council will continue to work closely and liaise with the Department of Education and Skills and LMETB to identify and procure school sites where a shortfall in school places is identified. (SOC OBJ 4 refers). This consultation will be most useful for the Forward Planning Section and will inform the review of the Local Area Plans.

Observations are noted. Education provision in the Trim will be explored further as part of the preparation of the Trim Local Area Plan in conjunction with LMETB and the DoES.

However, it is proposed to reserve a site extending to 15 acres in area for educational purposes off the Dublin Road for the purposes of a primary and post primary educational facility.

#### **Chief Executive's Recommendation**

Please refer to CE's Recommendation outlined in submission no.824 (in particular points no 4, 5 and 6 refer).

<b>Submission No.(s):</b>	MH-C5-908
<b>Submission by:</b>	LMETB
<b>Submission Theme(s):</b>	Chapter 7 Community Building Strategy and Ratoath Written Statement.
<b>Summary of Submission:</b>	
<ul style="list-style-type: none"> <li>• This submission states that a new primary and post primary school is required to cater for future educational needs in Ratoath over the lifetime of the Plan.</li> <li>• It is submitted that a 1,000 student post primary school requires 10 acres, while 6 acres is the general requirement at primary school level.</li> <li>• It is requested that such lands be zoned for G1 use and have adequate road frontage and services.</li> </ul>	
<b>Chief Executive's Response</b>	
<p>The submission from LMETB is welcomed. Educational Facilities have an important role to play in developing sustainable and balanced communities as well as encouraging families to live in the County. As stated in the Draft Plan the Council will continue to work closely and liaise with the Department of Education and Skills and LMETB to identify and procure school sites where a shortfall in school places is identified. (SOC OBJ 4 refers). This consultation will be most useful for the Forward Planning Section and will inform the review of the Local Area Plans.</p>	

Observations are noted. Education provision in the Ratoath will be explored further as part of the preparation of the Ratoath Local Area Plan in conjunction with LMETB and the DoES.

**Chief Executive's Recommendation**

No change recommended.

# Chapter 8

## Cultural and Natural Heritage Strategy

<b>Submission No.:</b>	MH-C5-17
<b>Submitted by:</b>	Donal and Niamh Black
<b>Submission Theme(s):</b>	Chapter 8 – Cultural and Natural Heritage Strategy
<b>Summary of Submission:</b>	
Record of Protected Structures – Proposed Addition 91561 Milestone at Smithstown, Drogheda – Laytown/Bettystown.	
<b>Chief Executive's Response</b>	
Owner accepts and agrees with recommendation.	
<b>Chief Executive's Recommendation</b>	
No change required.	

<b>Submission No.:</b>	MH-C5-18
<b>Submitted by:</b>	Evelyn Mooney
<b>Submission Theme(s):</b>	Chapter 8 – Cultural and Natural Heritage Strategy
<b>Summary of Submission:</b>	
Record of Protected Structures – Proposed Deletion 90163 Dwelling at Killmoon.	
<b>Chief Executive's Response</b>	
Owner accepts and agrees with recommendation.	
<b>Chief Executive's Recommendation</b>	
No change required.	

<b>Submission No.:</b>	MH-C5-21
<b>Submitted by:</b>	Richard Steen
<b>Submission Theme(s):</b>	Chapter 8 – Cultural and Natural Heritage Strategy
<b>Summary of Submission:</b>	
Record of Protected Structures – Proposed Addition 91561 Castle Odder – Tara	
<ol style="list-style-type: none"> <li>1. Castle Odder should be distinguished from the sheds and stables which are also present within the Folio. As can be seen from the Ordinance Survey maps enclosed from 1836 these accompanying structures did not exist in 1836..... They have no connection to features of interest described in the appraisal and do not belong on a Record of Protected Structures. It is submitted that the scope of any anticipated protections should be delimited to the buildings of Castle Odder itself, in line with the appraisal submitted.</li> <li>2. Regarding the interior of Castle Odder..... Many changes took place both to maintain</li> </ol>	



the structure itself and also to maintain a secure and habitable environment for the residents. In this regard it is submitted that:

- a) Modern features of Castle Odder (e.g. The television aerial in the picture on the appraisal, or floor tiles recently installed) do not merit special protection;
- b) It is in the best interests of the property that it is maintained in a way that ensures it is secure and habitable in accordance with the usual standards of the day and that reasonable works necessary to endure that this remains the case should be permitted;
- c) Works that are necessary to discourage wildlife from occasional harm to the property (for example jackdaws blocking chimneys or rats entering the building) should be permissible; and
- d) Works that are necessary to secure wiring, prevent fires or secure the property from criminal activity should be permissible.

### Chief Executive's Response

The issues raised in this submission were previously sent to Meath County Council in your letter of the 4<sup>th</sup> of January 2020. The response prepared by Conservation Officer of Meath County Council in our letter to you of the 16<sup>th</sup> of January 2020 addressed all matters and are discussed further below.

1. It is noted in the Proposed Recorded Protected Appraisal for Castle Odder that *'the house is of interest socially for its varied uses, and technically as it retains features and materials from different periods. Notably, the chimney stacks in the N and S gables each have three diamond shaped flues. The rear, East face, has very few windows but a central gable has a projecting chimney flue supported on corbels from the first floor. The building is probably eighteenth century in date but incorporating fabric from an earlier house'*. The sheds and stables, which form part of the curtilage of the Proposed Record of Protected Structure may not have the same significance as the special features mentioned above, they are nonetheless part of the curtilage, estate and demesne of Castle Odder and will become part of the listing as an RPS. Their ruinous state has been noted.

The obligation to preserve a protected structure applies to all parts of the structure, including its interior, all land around it, and any other structures on that land, and their interiors. The obligation also applies to any exterior or fixtures and fittings of a protected structure or of any structure immediately within its curtilage. If a declaration is sought (Section 57 ) the planning authority can clarify which if any, parts of the structure or its surrounding curtilage are not of special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest, and therefore do not require special protection.

2. The obligation to preserve a protected structure applies to all parts of the structure, including its interior, all land around it, and any other structures on that land, and their interiors. The obligation also applies to any exterior or fixtures and fittings of a protected structure or of any structure immediately within its curtilage. If a declaration is sought ( see section 7 below ) the Planning Authority can clarify which if any, parts of the structure or its surrounding curtilage are not of special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest, and therefore do not require special protection. An owner or occupier must ensure that a protected structure or any element of a protected structure is not endangered. Endangering a structure can mean either directly or indirectly damaging the structure, or any element of it by neglecting the

structure to such an extent that it is endangered.

Under the planning system, minor works to structures do not normally require planning permission. These works are known as exempted development. However, for a protected structure, such works can be carried out without planning permission only if the works would not affect the character of the structure or any element of the structure that contributes to its special interest. You may seek a declaration from the planning authority as to the types of works which would or would not materially affect the character of the structure (Section 57 Declaration) and would / would not require planning permission. In the case of some structures where the decorative condition is of special interest, planning permission could be required for interior decorating such as plastering or painting.

#### **Chief Executive's Recommendation**

No change required.

<b>Submission No.:</b>	MH-C5-27
<b>Submitted by:</b>	Athboy Tidy Towns
<b>Submission Theme(s):</b>	Chapter 8 – Cultural and Natural Heritage Strategy
<b>Summary of Submission:</b>	
<p>Record of Protected Structures – Proposed Addition</p> <p>Herewith, on behalf of Athboy Tidy Towns and residents who appreciate what is left of the historic (circa 1835) staging post complex, we ask that this modest but interesting vernacular structure is considered for addition to the NIPS. This building, however, is privately owned and we are uncertain as to what the current owners plan for its future.</p> <p>Located on N52 through Athboy Town.</p>	
<b>Chief Executive's Response</b>	
<p>Planning permission KA803334 for utilising the remains of this building and creating a two-storey stone clad structure using the footprint and stone arches of the original building has now lapsed. (Granted 2008).</p> <p>There is not sufficient architectural merit or social history sufficient to warrant the listing of this structure on the list of the Record of Protected Structures. The building is a 19<sup>th</sup> century outbuilding. However, given its location, there is a possibility that stonework from an earlier building may have been incorporated. Should planning approval be sought for this site in the future, consideration will be given, as was before, to retain as much of the original structure as possible (cut stone arches and stone) in any future development or use.</p> <p>The County Development Plan contains sufficient policies to protect traditional vernacular buildings in urban and rural contexts. Chapter 8.7.3 – Historic Building Stock and Vernacular Architecture HER POL 21, HER POL 22.</p> <p>The site of the building sits within the Zone of Archaeological Potential for the town of Athboy and is just inside the south-western corner of the historic walled town, with the location of the West Gate immediately to the east. It is possible that in the event of excavation of this site that archaeological remains relating to the town defences may come to light. As National Policy on</p>	

Town Defences states that all town defences are National Monuments, archaeological testing and monitoring will be conditioned as part of any planning approval for this site.

#### Chief Executive's Recommendation

No change required.

<b>Submission No.:</b>	MH-C5-44
<b>Submitted by:</b>	Keep Ireland Open
<b>Submission Theme(s):</b>	Access to the countryside and directly related issues
<b>Summary of Submission:</b>	
<p><b>SUBMISSION TO MEATH DRAFT DEVELOPMENT PLAN</b></p> <p>The Draft fails to comply with, have regard to or take into account: Planning &amp; Development Acts Plans in adjoining counties DoECLG Guidelines National Heritage Plan RSES Eastern and Midland Development Plan Guidelines</p> <p>We will refer to these in the course of our Submission.</p> <p>The scope of our submission is limited to access to the countryside and directly related issues.</p> <p>Other county plans</p> <p>While you are only obliged to take into account plans in adjoining counties, you may care to take into account plans in other counties particularly those within the RSES Midland Region.</p> <p>We presume that you will be monitoring the provisions in Draft Wicklow and Louth Plans which have commenced and that you will liaise with their planners to ensure that the plans are compatible, where appropriate.</p> <p>We presume that you will include in the Plan relevant provisions in the soon to be completed Heritage Ireland 2030 Plan.</p> <p>Counties in bold are adjoining or in the RSES Eastern Region</p> <p>The mention of a provision in the Draft, without comment, indicates our support.</p> <p><b>FORMAT</b></p> <p><b>Index</b> We submit that you should provide an Index, as recommended in the Development Plan Guidelines (5.15), and that the page numbers where topics are primarily dealt with should be balled. See Sth Tipp Clare DLR &amp; Waterford.</p> <p><b>Design and Development Standards</b> We submit that these should dealt with at the end of each Chpt as this would make the plan more user friendly. At the very least the Pol Chpts and Chpt 11 should be cross referenced.</p> <p><b>Layout</b> We submit that this can be improved by sub-numbering or sub-lettering lists of points and paragraphs. The present layout creates difficulties when referring to particular points. Also the Chp numbers should be placed on each page.</p>	

## CHAPTER 1 Introduction

### 1.2 Legislative Framework

3rd para 2nd 1st sentence

2nd sentence We submit that you should include a complete list as required by the 2000 P & D Act Sec 10, (as amended by sec 7 of the 2010 of the 2010 Planning and Development (Amendment) Act, preferably as an Appendix.

Notes

1 There are 31 pts in all

2 A complete list acts as an aide memoire for the topics to be dealt with in the Plan

Last sentence

We submit that you should include the following additional Provisions:

\*1 The Planning Act and Development Act 2000 Sec 9(6) requires that a development plan shall, as far as practicable, be consistent with national plans, policies, guidelines and strategies.

2 The Planning and Development Act 2000 Sec 15(2) requires a two year Review and that development plans should include a commitment to that effect.

3 The Planning and Development Act 2000 Sec 28 (as amended by Sec 20 of the 2010 Act) requires the inclusion of a statement as to how the Plan has been implemented or not implemented the policies and objectives of the Minister.

4 The Planning and Development Act 2000 Sec 28 (as amended by Sec 20 of the 2010 Act) requires the inclusion of a statement as to how the Plan has been implemented or not implemented the policies and objectives of the Minister.

\*5 The Planning and Development Act 2000 Sec 10.2(as amended) must include a statement which demonstrates that the development objectives in the Development Plan are consistent, as far practicable, with the protection and conservation of the environment.

\*6 The Planning and Development Act 2000 Sec 9(4) requires that the Plan must have regard to plans in adjoining counties.

7 This Plan shall co-ordinate the objectives in this plan with those in the adjoining counties, except where it is considered to be in appropriate or unfeasible and shall take into account any significant likely effects the implementation of the plan may have on the area of any adjoining county. Based on Wicklow 1.4 4th para 1s t sentence and many other counties.

#### \*1.2.4 Ministerial Guidelines

#### 1.4.4 Regional Policy

Regional National Spatial and Economic Strategy 1919-2031

1st Para

We submit that you should include an additional Para: The Plan shall be in conformity with the RSES for Eastern and Midland Region.

Note

The provisions marked with an \* indicate that the Draft, as it stands, does not comply in all respects with the provision.

### 1.5 Table of Contents of the County Development Plan 2020- 2026

We submit that you should revert to the excellent detailed Contents Sec in the 2013 Plan.

## CHAPTER 4 Economy and Employment Strategy

#### 4.7 Development Plan Economic & Employment Strategy ED POL 12

We submit that you should include additional POLS/OBJS:

- 1 Applicants for development or expansion of small-scale business in rural areas must demonstrate that the proposed location is suitable and that the proposal would not be viable at an alternative location. Taken from Monaghan 4.9 BRP 2.
- 2 In assessing an application for development or extension of small-scale businesses in rural areas will take into account the Nature and scale of the proposal, whether the business is more suitable at the proposed location than an urban setting and the potential impact on environment and amenity. Taken from Monaghan 4.9 BRP 3 2 to 4.
- 3 Only grant planning permission for a building in the countryside where the development would not cause a detrimental impact or erode rural character. Any new building will not be acceptable where it is unduly prominent in the landscape, where it results in build-up of development when viewed with existing and/or approved building or where the impact of the ancillary works, including the creation of visibility splays would damage rural character. Taken from Monaghan 15.16 RCP 1 1st, 2nd & last pts.
- 4 Prohibit developments and other activities associated with tourism unless they are appropriate to the traditional character of the area and do not interfere with, or detract, from areas of special amenity or from the visual/scenic amenities on approach roads to the visual setting of, or the views to be had from, significant tourist attractions. Developments must minimise adverse impacts on landscapes, must be sensitively located and landscaped and be sympathetic in manner with regard to heritage. They must ensure the protection, enhancement and enjoyment of amenities, be compatible with the relevant land uses in their nature, intensity and scale, are not located where they would be detrimental to environmentally sensitive landscapes either existing or which may arise in the future or areas identified as sensitive landscapes in the LCA so that that they do not impact negatively on the landscape, are of a high standard of design and landscaping, with consideration being given to the impact on their surroundings that all tourism developments, are designed to the highest quality and standards that must not give rise to significant adverse impact on scenic heritage or environmental or conservation qualities of the area or on Natura 2000 sites. Based on Wicklow Vol 1 7.4 T2, Offaly 2.11.10 2nd para, Westmeath 3.14 P 3, 2013 Plan 4.6.8 ED POL 27, Monaghan 4.7.2 TMP 2 and many other counties.
- 5 Tourism and recreational development shall be assessed against the nature and scale appropriate to the character of area and shall be located to be visually sympathetic to its surroundings. Taken from Wicklow Vol 3 App 1 4 Tourism & Recreation, General criteria for tourism and recreational development 1st pt 1st sentence & 2nd pt 1st sentence
- 6 Ensure that economic development that urban in nature should be located in urban areas. Taken from RSES EMR RPO 4.82.

#### 4.24 Tourism

We submit that you should add "and Recreation" to the Title to better reflect its contents.

We submit that you should include additional POLS/OBJS:

- 1 Support development, in co-operation with various stakeholders to promote, preserve, improve, encourage public access to lakes, beaches, coastal, riverside, uplands and other areas that have been traditionally used for outdoor recreation and extend recreational amenities. Based on 2000 Planning and Development Act Sec 10(2)(j), 2013 Plan 4.6 POL 40, Westmeath 3.14 P 7 down to recreation on line 3 and many other counties.
- 2 Promote and encourage the recreational use of coastline, rivers and the development of

blueways which provide opportunities for walkers, cyclist and canoers. Taken from Wicklow Vol 1 7.4 T34 1s t sentence 1s t phrase

3 Protect and preserve recreational attractions such as scenic beauty, woodlands and waterways, coastal areas and beaches, natural heritage, the character and distinctiveness of scenic landscape and the environmental quality. Taken from Wicklow Vol 1 7.3 Strategic Objs gth & last pts.

4 Ensure that golf course development does not impinge on existing public rights of way and walking routes by identifying them prior to development. Taken from Sth Dublin 11.5.S(ii) last para & Kildare 14.12.2 RW 3.

Note Recreational users and golfers don't mix! While there are rights of way over golf courses, they aren't satisfactory as walkers run the risk of being hit by golf balls and golfers are distracted by people talking and moving about.

#### 4.28.5 Walking and Cycling Routes

We note that walking/cycling are dealt with in several places in the Draft. Walking/Cycling is a broad topic and encompasses the reasons why people walk or cycle including travelling to work, schools and shops and for exercise and for recreation. As walking/cycling is becoming an increasingly important part of peoples' lives we feel that it merits a separate chapter. At the very least it should be cross referenced.

ED POL 57

58 1s t sentence phrase

Last phrase We submit that this should be repositioned in 5.7.6

Cycling and Walking and merged with MOV POL 17 1s t phrase. OBJ 75 1s t para

76 We submit that this should be merged with 57 1s t sentence last phrase.

77

### CHAPTER 5 Movement Strategy

#### 5.7 Sustainable Transport

##### 5.7.6 Cycling & walking

6th to last paras

##### 5.7.7 Green Schools

This requires to be moved somewhere else

MOV POL 17 1st phrase We submit that this should be replaced by: Create, provide, promote, improve, plan, develop, support, enhance , maintain encourage, extend and facilitate the recreation potential of walking, rambling and cycling in conjunction the Irish Sports Council and other agencies by identifying/defining more dedicated walking and cycling routes such as the Royal Canal to enable the creation of a high quality, coherent, Pleasant, integrated and comprehensive dedicated off road countryside network of local and regional cycling/walking routes, footpaths and greenways that link communities to key destinations and amenities, including local walks, community walks medium/long distance walks and established rights of way, through open spaces, strategic green corridors(including river corridors) and other off-road routes), particularly those with historic associations/connections or other areas of interest. Expand and extend existing routes by utilising links from residential areas to provide access to coasts, mountains, lakeshores, rivers and scenic areas. Bring mountain amenities closer to residential communities by promoting the establishment of a network of formal footpaths, off road paths and cycleways that are attractive and facilitate casual walkers and cyclists. Investigate the provision of dedicated cycle and pedestrian routes along routes of high amenity. Based

on DPG 3.5 Box 3 B Infrastructure 3rd point, National Physical Activity Plan App 1 36, Smarter Travel 2009 - 2020 Cycling and Walking 1st para in line 6 & P 35 1st sentence 1st phrase, Kildare 14.12.1 CR 4, 2013 Plan 4.6.8 2nd para 1st & 4.6, Sth Dublin 4.5.0 Pol 6.1, 6.3.0 Pol 3.1& 9.4 .0 . Pol 16.5, Wicklow Vol 1 7.4 T29 1st phrase & 9.1.3 TR11 1st phrase, Offaly 7.14 LAO 03 and many other counties.

18 & 20

OBJ 25 & 26

30 We submit that this this should be replaced by: Support, promote, facilitate and continue the development of a comprehensive network of greenways in accordance with the OTT Strategy for the Future Development of Greenways. linking parks and public open spaces to regional and national Greenway Networks and work with the NTA and adjoining councils and all stakeholders to develop a co-ordinated approach to the selection, delivering and servicing of future greenway, in order to achieve improve external linkages, to achieve maximum impact and connectivity and to provide alternative routes for pedestrians and cyclists. Based on NPF App 1 Obj 22, Kildare 5.19 EO 49 and many other counties.

31 We strongly support this

We submit that you should include additional provisions:

#### WALKING

Table We submit that you should include a Table with maps of Way-marked Ways of medium/long-distance walking routes, Greenways, Sli na Slainte, heritage/historic walking trails, pilgrim paths, paths to mass rocks and holy wells, looped walks, hillwalks, forest walks and other defined walking trails with accompanying maps and a data base should be set-up and up- dated as new trails emerge. Based on Louth Map 7.2 and many other counties.

To this you should add: Following the adoption of the Plan a temporary register of additional routes shall be maintained and should be included in the web site pending inclusion in the next Plan.

#### POLS/OBJS

1 Promote and facilitate the continuing development of a regional and local network of Ways and Permissive Access Routes that provide a network of long distance walking, running and hiking trails and routes. Encourage the re- routing of existing trails off public roads. Based on Sth Dublin 9.4.0.3 1st sentence 1st phrase & 2<sup>nd</sup> sentence and many other counties.

Note In contrast to public rights of way, long distance walking routes exist on a permissive access basis and are not to be confused with designated public rights of way as consent can be withdrawn at any time by the landowner. Taken from Sligo 6.7.4 Permissive Trails.

2 In view of the obesity and diabetes crisis, support, improve, develop, expand, upgrade and facilitate Sli na Slainte routes. These should be waymarked/signposted, where feasible. Based on Kildare 6.5 WCO 5 last pt, Westmeath 8.13 0 13 last phrase, Louth 6.7.1 1st para and many other counties.

3 Promote walking through the development and expansion of a network of safe walking trails within towns and villages and their environs. Such routes can link with existing waymarked trails, Sli na Slanite and the Green Infrastructure Network and existing or new public rights of way. Taken from Fingal Chpt 5 Obj RF113.

4 Support the provision of proposed long distance walking trails that provide access to scenic uplands, riverine and coastal features. Taken from Fingal Chpt 5 Obj RF115.

5 Research and map existing network of traditional paths used for leisure



purposes to determine their legal status. Taken from Carlow 8.11.10 Obj 3 2nd pt.

6 Employ a full time Walks Officer at an appropriate senior level.

Note Many counties employ one.

7 The Council will co-operate with relevant agencies, both public and private, including the National Trails Office, NWMWAC, Coillte, the Heritage Council, adjoining councils and local landowners, to support the development, maintenance, facilitation and enhancement of medium and long distance hiking/walking routes, community walks and off-road trails particularly in the uplands. This will include consultation with adjoining councils with a view to promoting routes extending beyond the county boundary. Based on Westmeath 3.14 P-GT 7 5th line & many other counties.

8 Lobby the appropriate Government Department to agree and implement a scheme to indemnify private landowners with regard to recreational users of their land. Taken from Action Plan for Rural Development 2017 Pillar 3 Act 176.

9 Preserve and protect the integrity of existing public walking and access routes (including long distance walking routes) which contribute to the general amenity by prohibiting the intrusion of development along these routes particularly those in scenic and high amenity areas and along inland waterways. Based on Louth 6.5.11 EDE 22, Monaghan 7.5 CWO 5, Kildare 14.12.2 RW 2 and many other counties.

10 Protect listed walks from development that creates or has the potential to create disamenities. Taken from Cavan 9.4.1 2nd para .

11 Take the potential impact of proposed development into account when considering/assessing applications for permission in the vicinity of established walking routes that might impinge on walking routes (including long distance) or potential walking routes. Taken from Sligo 6.7.4 Established walking routes 2nd & 3rd sentences .

12 Protect access routes to upland walks and public rights of way. Taken from Laois 5.10 RUR14.

## CYCLING

### Table

We submit that you should include a Table of Cycle routes with maps See Kilkenny Fig 7.1 & Roscommon 8.7.1 Table 8.2 Map 17. Also Westmeath 8.11 which mentions some.

To this you should add: Following the adoption of the Plan a temporary register of additional routes shall be maintained and should be included on the web site pending inclusion in the next Plan.

13 Promote, facilitate and encourage the development, enhancement and expansion of safe cycle routes by facilitating the construction of cycleways. Support the development of the National Cycle Network and enhance and maintain these routes with better signposting, lighting and road surfaces separated from vehicular traffic. Encourage the development of off-road cycling. Ensure that the upgrading of roads will not impact negatively on the safety and perceived safety of cyclists. Ensure that any dedicated cycle routes which are developed away from the main public carriageway are well lit. Routes should, where possible, follow off-road tracks and quiet country roads. Based on

DoTT's NCPF(2009) 00 Breadth of Interventions page 7 6th pt on right hand col & 1st & 8th p t s , Pol 3.4, Obj 5 & Pol 5.6, 0 ffaly 4.6 STAP 08 1st line &

7.14 LAO 03, Westmeath 8.13 0 8 1s t sentence 1s t phrase , 2nd sentence last phrase , last sentence 1s t & last phrases, Kildare 6.5.2 ST 17 1s t phrase , Louth 6.7.2 RA 18, Cavan 4.1.2 Objs 2nd pt and many other counties.

14 Cycle routes should be designed using current thinking and best practice from experience in other locations, lower speed limits and priority over motorised transport to ensure road safety for pedestrians and cyclists. Taken from Roscommon 8.7.1 42 2nd sentence.

15 Support the development maintenance and enhancement of trails and routes in co-operation with the Sports Council, NTA, NTO, NWMWAC, Heritage Council and other bodies to develop cycle touring routes including those linking with adjoining counties particularly in areas of high amenity. Based on Kildare 14.12. 1 CR 9 and many other counties.

16 Ensure that new development does not prejudice the expansion of cycling corridors that would compromise their future delivery. Taken from Monaghan 7 Transport Policies TP 4  
WALKING & CYCLING

17 Support, promote, secure and actively encourage the provision, development, extension and design of off road regional and Regional interlinked cycleways and walkways, hiking, walking and cycling routes( and trails (mention routes), including medium and long distance walkways, in conjunction with IW and other stakeholders to link a strategic network of trails and in adjoining counties, in accordance with national policy and guidelines and in partnership with their councils, the state, private and voluntary sectors. Based on Westmeath 3.16 0 3, Louth 6.5.11 EDE 23 1s t sentence, Wicklow Vol 1 7.4 T29 and many other counties.

18 Walking and Cycling will be promoted, facilitated and encouraged in accordance with initiatives contained in "Smarter Travel 200g' by improving existing cycleways and developing a network of safe, convenient and guarded cycle routes and footpaths on existing roads. Ensure, where possible, that cycleways and footpaths are effectively separated from major vehicular carriageways. Provide, promote, improve and extend the network of off road cycle and walking routes on all new road improvement schemes (including regional and local roads, on roads being up-graded) , to ensure personal safety, particularly at night and a more convenient, pleasant, attractive environment. Support the installation of infrastructure measures e.g new/wider pavements, road crossings, retrofitted, if necessary , which would facilitate and encourage safe walking and cycling. Based on Smarter Travel 2009 - 2020 Cycling and Walking 1st para 2n d sentence last phrase, Kildare 6.5 WC 2, Louth 7.4 TC 22 & 23, 2013 Plan 6.9 POL 22, Wicklow Vol 1 9.1.3 TR9 to 11 and many other counties.

19 Support the provision of the signposting and waymarking of walking and cycle routes with appropriately designed quality signage and information boards, during the lifetime of the Plan. Based on Wicklow Vol 1 7.4 T29, Kildare 14.12 CR 10 and many other counties.

20 Seek opportunities for the development of suitable walking routes and cycle tracks along historic access routes. Explore the potential of inter-county trails(named) . Based on Action Plan for Rural Development

2017 Pillar 3 Action 200, Leitrim 3.6.3 Obj 29 & Longford 4.5 Mid-Shannon Wilderness Park(sic) last para.

21 Develop and promote a Walking and Cycling Policy/Strategy within two years of the adoption of the Plan, working in partnership with statutory bodies, private and voluntary sectors,

landowners and other stakeholders. The Strategy should list trails, evaluate these routes and make recommendations for their promotion and would address, inter alia, the possibility of cycle-ways in recreational areas and along river banks, car parking for walkers and cyclists and improved signage and maps. Taken from National Activity Plan for Ireland App1 32, Kildare 14.12.1 CR 3 and many other counties.

#### Note

1 Done: Louth & Monaghan and many other counties

2 Fingal has adopted a Cycle Strategy.

22 Provide adequate car parking and/or lay-bys for walkers and cyclists, (from your local knowledge name important locations) and other appropriate points to facilitate access to amenity/scenic areas from 9am until dark. Based on Kildare 14.12.1 CR 14 last phrase and many other counties.

#### Notes

1 The absence of car parks can cause unnecessary friction between landowners and recreational users.

2 The primary responsibility for the provision of car parking lies with councils

23 Establish new Walkways and cycle routes on a legal and permanent basis. Taken from Sth Dublin 2.2.14 2nd last phrase.

24 Develop a strategy to underpin the funding for the development and extension and enhancement of walking/cycling trails, greenways, including off-road trails, inter-county waymarked walking and cycle routes and the Royal Canal through the Action Plan for Rural Development 2017, DoTTS, NTA, Heritage Council and associated transport agencies and LEADER. Based on Action Plan for Rural Development 2017 Pillar 3 Action 167, Westmeath 3.14.06, Sth Dublin 4.5.0 Action and many other counties.

25 Ensure that walking and cycling routes and the public footpaths network are maintained. Based on 2013 Plan 4.6.8 2nd paragraph sentence and many other counties.

26 Protect the integrity of established and future walking and cycling routes from development which would adversely impact upon them or their settings. Taken from Louth Chpt 6 EDE 22 & Monaghan 5.9 Cycling and Walking Policies CFP 12 last phrase,

27 Ensure that development proposals protect the routes of potential linkages such as linear paths footpaths trails, greenways and cycleways through a site where the Council considers that an opportunity to provide a linkage to or between adjoining areas. Taken from Donegal 5.1.2 P31. See also Cavan 9.4.1 Objects 2nd point.

28 The Council should with state agencies to deliver strategic greenways and blueways projects under the Strategy for the Future Development of National and Regional Greenways. Taken from RSES EMR RPO 7.25.

## CHAPTER 6 Infrastructure Strategy

### 6.10 Surface Water Management and Flood Risk Management

#### 6.10.2 Flood Risk Management

##### 6.10.2.4 Coastal Flooding

We submit that the Title and Text should be repositioned in 8.15 Coastal Zone.

POLS 21 to 29 & OBJS 22 & 23

#### 6.13 Ground Water

NF POLS We submit that these should be repositioned in 8.13. inland Waters.

OBJS While we support all the OBJS we submit that only one no 37 relates to Ground Water. Of the others quite clearly nos 29 to 35 relate of Coastal issues and should be repositioned in 8.15 Coastal Zone and nos 37 & 38 should be repositioned in 8.13 Inland Waterways.

#### 6.15 Energy

We submit that 6.15.3.6 Energy Efficiency should be repositioned after the Renewable Energy provisions together with INF POLS 35 to 40 & 42 to 47 & OBJS 40 to 46.

#### 6.15.3 Renewable Energy

POL 34 We submit that this should be merged with OBJS 39 & 48 and take into account Objs in other plans such as: The development including any ancillary facilities or buildings, considered individually or taking into account their scale and layout, their incremental/cumulative effect due to other proposals, the degree to which impacts are highly visible over a vast area, their visual impact on protected views and prospects, designed scenic landscape as well as local visual impacts, impacts on archaeology, should not create a hazard or nuisance, including the risk land instability and take into account the character and appearance of the surrounding area, the openness and visual amenity of the countryside, landscapes designated for their nature conservation, Natura sites and amenity values and sites of historic or archaeological interest or in proximity to National Monuments. Development will be subject to suitable locations and will only be permitted where they will not have an adverse impact on the environment including natural heritage and the protection of amenities and landscapes. Ensure proper integration with their surroundings. Where impacts are inevitable what mitigation features have been taken into account. See Fingal 12.10 OMS138 1st sentence 2nd phrase, (ii), (v) & (vi),

2013 Plan 8.1 EC POL 3 last phrase, Offaly 3.7 EP 02, Sth Dublin 10.2.10

E12 Obj 2 and many other counties.

POL 41

OBJ 47 We submit that you should add: within one year of the adoption of the Plan.

We submit that you should include additional OBJS/POLS: A RENEWABLE ENERGY

1 Developments must be appropriately located. Taken from Sligo 11.1 SP EN 2 1st para 4th line.

#### B WIND ENERGY

2 1 Identify existing public rights of way and established walking routes and maintain them free from development, preserve them as public rights of way or walking routes. Taken from Cavan 4.7.3.

3 All applicants should include a LIA dealing with possible impacts on any existing rights of way or established walking routes. Taken from Kilkenny 10.5.3 Landscape Impact Assessment 1st para 1st sentence.

#### Maps Zoning

Including areas in adjoining counties considered unsuitable: See Cork

County Fig 9.2 & Sth Dublin Fig 10.4.

The Maps should show the degree of acceptability from prohibition to preferred

## C HYDRO ENERGY

4 Have regard to the impacts of Hydro Energy Schemes on public rights of way and walking routes. Taken from Kildare 8.6 HD 4 3r d pt.

### 6.15.4 Energy Networks Structure

#### 6.15.4.1 Energy Networks Infrastructure

INF POL 48 We submit that this should be replaced by: Require the location of local energy services and other electricity infrastructure (including transmission lines) follows best practice with regard to siting and design so as to protect, maintain and safeguard environmental designated sites, the open character and amenities of high amenity and mountain areas by following natural features and by avoiding areas of high landscape sensitivity, protected views including views of special amenity value and the natural environment. Where impacts are inevitable mitigation measures to minimise their visual obtrusiveness must be provided for. Based on Westmeath 10.14 P ELE1 & 11.2.1 2n d para 2nd sentence, Monaghan 15.22 EGP 2 last sentence last phrase, 2013 Plan 11.15.4 4t h pt and many other counties.

50 We submit that this should be replaced by: The undergrounding or re- routing of transmission lines (including telephone and TV cables) shall be considered first as part of a detailed consideration and evaluation of all available options Where technically feasible and environmentally appropriate, HV and other powerlines(including existing powerlines) and associated equipment should be placed underground to reduce the visual impact on the natural environment especially in sensitive areas to preserve significant landscape and significant views from the visual intrusion of energy infrastructure and cooperate with other agencies as appropriate. Protect areas of recognised landscape importance and significant views from visually intrusive large scale energy transmission infrastructure by using alternative routing. Demonstrate that where impacts are identified mitigation feature have been included. Based on Monaghan 15.22 EGP 2 1s t sentence 1s t phrase, Louth 9.2 EnCo 5,Kildare 8.12.2 TN2 & 8 last sentence, 2013 Plan 8.1.10 EC POL 19 and many other counties.

### 6.16 Information and Communications Technologies

#### 6.16.4 Telecommunications Antennae INF POL 57

We submit that you should include an additional POL/OBJ: Existing Public Rights of Way and established walking routes will be identified prior to any new telecommunication developments(including associated processes) which will be prohibited if they impinge or impact thereon or on

recreational amenities or public access to the countryside. Taken Cavan 4.8 PI0 123.

Note Pending a complete listing of public rights of way, walking routes, as prospective rights of way, should be protected.

## CHAPTER 7 Community Building Strategy

### 7.7 Social Infrastructure

#### 7.7.6 Existing Sport and Leisure Structure

3rd Para We submit that this should be repositioned in 5.7.6 Cycling and walking as an additional para.

We submit that you should include additional POLS/OBJS:

1 Development proposals for Noise Generating Sports will not normally be permitted unless there is no conflict with the enjoyment of areas used for informal recreation. Taken from Kilkenny 7.7.2 last para 3r d pt.

2 Adopt Bye-laws banning the use of motor bikes and quads (except for bona fide

agricultural purposes) in privately- owned areas of rough grazing (including commonage) and motorised para gliders.

Note Louth & other counties have adopted bye-laws.

#### 7.7.7 Open Space

SOC POLS & OBJS 11, 14 & 16

#### 7.7.9 Burial Grounds

SOC POL 46 We submit that this should be replaced by: Protect the cultural heritage of historic burial grounds and preserve, enhance, conserve and maintain archaeological/historic graveyards and their settings and historic burial grounds (including those identified in the RPM) and those in the guardianship of the Council through improved access. Encourage and promote local involvement and community stewardship in the care, maintenance, management rehabilitation and conservation of these graveyards in accordance with legislation, best conservation and heritage principals and best practice guidelines. Maintain all burial grounds in the Council's charge in good condition. Based on Cork City Obj 9.17 1st sentence, Donegal 7.3.3 P 6, Laois 4.2.4 BG3 & Leitrim 3.4.5 Pol 28. See also

Westmeath 5.33 P 4 last phrase, Kildare 12.9.1 AH6 & POL 45 & 9.6.9 OBJ

11, Fingal 10.2 Obj CH04, Offaly 7.19 AAH P13 & 2013 Plan 5.12 POL 45 &

9.6.9 OBJ 11.

#### CHAPTER a Cultural and Natural Heritage Strategy

We submit that you should include in the Title Built to better reflect its provisions.

We submit that you should add an additional Sub Sec: Heritage

POLS/OBJS

1 Publish a list with maps of heritage sites which are open to the public.

Taken from Westmeath Heritage Plan 4.2.

You should add: and post on the Council's web-site.

2 Prepare and implement a strategy for access to heritage routes by identifying and supporting the development of a network of heritage trails, with a focus on publicly accessible heritage sites and attractions in co-operation with community groups, landowners and other stakeholders

incorporating features of heritage interest. Based on Heritage Plans from Sth Dublin 2.4.(i), Wicklow 2.1, Westmeath 4.4 & 3.2.10 and many other counties.

We submit that you should include an additional Sub Sec: County Heritage Plan

POL/OBJ

2 The Council will work with the Heritage Forum in order to deliver the objectives and actions of the Plan to protect the natural heritage and implement, promote and support and actively work in partnership with all relevant stakeholders (including the Co Heritage Forum, the Heritage Council, OPW, NPWS, NMS, community groups and the public, the aims and objectives contained in the Plan and any revision thereof. To which you should add: See our web-site (insert address). Based on Fingal 9.1 Obj NH01, 2013 Plan 9.4 last para 1st sentence and many other counties.

#### 8.6 Archaeological Heritage

We submit that HER POLS 1 & OBJS 3 should be merged and replaced by: Promote the protection of archaeological heritage as defined in the Heritage Act, including the intrinsic value, character, amenity, visual integrity, context and settings of National/Recorded Monuments, caves, Zones of Archaeological Potential, Zones of Archaeological Notification or newly-discovered archaeological sites and/or sub-surface archaeological remains, known and unknown, either above or below

ground, including those identified in the RMP, RHM & SMR, castles, monuments and features of historic interest and National Monuments that are the subject to Preservation Orders in the ownership or guardianship of the State or the Council, by supporting, conserving, sympathetically enhancing, preserving, properly managing proposed developments which would be seriously injurious to the

settings, character or cultural value of sites or RPMs, including those within or adjacent to sites or which might affect them, in particular, those within a 20m radius of National Monuments, Zones of Archaeological Potential will not be permitted and those within 75m will be discouraged. Ensure that development, adjacent to or in the vicinity of an archaeological monument shall not detrimental to its character be or setting and shall be sited and designed in a manner which minimises its impact settings, is resisted. Extend this protection to cover additions or alterations that may arise during the adoption of this Plan. Impose conditions on development that might impact on sites of Archaeological Potential to ensure that appropriate measures are taken and that archaeology is suitably integrated into new development, in co-operation with the relevant Government Department. Based on 2000 Planning & Development Act Sec 10(2)(c) 1st phrase, & First Sch Part IV 6, DPG 4.26 1st para 1st sentence, Sec on Arch her 2nd sentence, 27 1st pt & 28 2nd para last sentence, Louth 5.9.1 HER 21 1st sentence, Offaly 7.19 AAHP- 04 3rd pt, 07 & 17 & 7.20 AAHO 06, 2013 Plan 9.6.9 OBJ 7, Fingal 10.1 Statement of Policy 1st para 1st pt & 10.2 Obj CH03, Westmeath 5.33 01 & 8, Wicklow Vol 110.2.2 Archaeology last sentence & 2 BH 3, Cavan 7.5.2BHP 5 & 8 & BH O 18 and many other counties.

OBJ 1 We submit that this should be repositioned in an additional Sub Sec: County Heritage Plan and replaced.

3&4

5 We submit that this should be replaced by: Recognising the importance of archaeology and National Monuments as part of our heritage and important elements in long term economic development, promote, enhance, facilitate, encourage, support, improve and protect public access to National Monuments, Archaeological Sites, castles, sites of historic interest and to archaeological landscapes, in the direct ownership, guardianship or control of the Council, and/or the State or private ownership, including those listed in the RMP, in co-operation with landowners and promote walking routes thereto. Based on Sth Dublin 9.4.0, Wicklow 10.2.2 BH4, Kildare 12.9.1 AH 8 and many other counties.

8.6.1 UNESCO World Heritage Site - Bru Na Boinne

8.6.2 Sustaining the Outstanding Universal Value

8.6.3 Statement of Policy

8.6.4 World Heritage Tentative List HER OBJ 12

13 We submit that you should add: Support pursue, progress, facilitate and promote their designation as UNESCO WHS in collaboration/partnership with the appropriate Government Department, landowners, local communities and other stakeholders, to assist in the preservation of the natural heritage. Based on Action Plan for Rural Development 2017 Pillar 3 Act 190 & Wicklow Vol 1 10.2.2 BH 6 & Louth 5.9.9 HER 32.



We submit that you should include an additional POL/OBJ:

Ensure that development proposals in designated WHS will be assessed having regard their contribution to their preservation and enhancement.

Protect and preserve them from inappropriate development and maintain the Outstanding Universal Value of the tentative WHS of sites and engage with other national and international initiatives which promote special places of natural heritage. Based on Louth 3.10.7 6 & 5.9.9 HER 31 and many other counties.

We submit that you should include an additional Sub Sec: Mass Rocks/Holy Wells

POL/OBJ

Preserve, protect and, where necessary, enhance mass rocks and holy wells. Taken from Nth Tipp 8.4.5(iii).

## 8.8 Natural Heritage

We submit that you should include POLS/OBJS:

1 Recognizing the role played by natural amenities and landscapes as major resources as part of our heritage, identify, provide, support, maintain, actively promote, encourage, protect, preserve, improve, safeguard and enhance public access to heritage sites and features, natural heritage and amenities including Natura 2000 sites, nature reserves, uplands, moorlands, forests, rivers, lakes, valleys, scenic areas, areas of natural beauty and other natural amenities for activities such as hill-walking, which have been traditionally used for outdoor recreation, and to the countryside generally, by creating a meaningful network of access routes as the opportunity or need arises and by designating traditional walking routes thereto as public rights of way. This will be done in co-operation, consultation and consensus with state agencies, landowners, community groups other interested bodies. Based on Wicklow Vol 1 10.3.7 NH40, Sth Dublin 9.40 Pol 16, Fingal 5.1 NH01 and many other counties.

2 Prohibit intrusive development that would detrimentally impact on natural heritage which could or might have a negative impact on natural amenity assets or natural heritage features or might unduly damage or take away from its character. Promote appropriate enhancement of the natural environment as an integral part of development. Engage with stakeholders,

including local communities, to protect, conserve, preserve, manage, enhance, safeguard, facilitate, maintain and, where appropriate, restore, visual and scenic amenities, the quality and character of the natural heritage features and the natural environment including rivers, streams and other waterways, wetlands, woodlands and forests, scenic areas and the general amenity, value and character of the countryside and in recognition of its importance as a non-renewable resource, from intrusive development that would detrimentally impact on it, for the benefit, while maximising the recreational amenity and quality of life for present generation by the provision of visual relief from the built environment. Avoid unnecessary harm and reduce its effect where it cannot be avoided by replacing like with like.

Based on DPG 3.5 Box 3 Environment, Heritage & Amenities last pt, 2000 Planning & Development Act Sec 10.2 ©, NPF Pol Obj 60, RSES EMR RPO 4.52 last phrase, Offaly 2.11 4th para & 7.4 NHO 02, Louth 5.7 HER 10, Kildare 14.10 LO 4, 2013 Plan 4.6.8 POL 29, Kildare 13.4 NH 1, Westmeath 7.13 P REC1, Sth Dublin 4.3.3 Strategy 2nd pt, Wicklow Vol 1 10.3 Natural Heritage Strategy 4th pt, Cavan 8.2 NHEP1 and many other counties.

3 Preserve the open character of commonage land and other hill land and secure access

over paths and tracks through consensus with landowners, particularly in mountain areas. Taken from Wicklow Vol1 10.3.7 NH42.

## 8.9 Biodiversity

### 8.9.1 Protecting Biodiversity in Meath- Sites Designated for Nature Conservation HER POLs 32 & 33 & OBJ 33

#### 8.9.5 Protected Species

HER OBJ 33 This should obviously numbered 34.

#### 8.9.6 Woodlands, Hedgerows and Trees

HER POL 40 & 41 We submit that these should be merged. OBJs 36 & 37

We submit that you should include additional POLS/OBJS:

1 Protect woodlands and groups of trees from inappropriate development that would impact adversely on them and affect their amenity value. Manage and promote the preservation and enhancement of the existing network of woodlands as they contribute to the environment including landscape character and landscape conservation and designate TPOs where appropriate. Based on Wicklow 10.3.3 NH14, Fingal 9.2 Obj

NH27, Kildare 13.10.1 GIB 1s t phrase, Monaghan 6.15 TWP 2 and many other counties.

2 Protect and encourage access to forestry and woodlands, in co- operation with Coillte, private landowners and other stakeholders for walking routes (including long distance and looped walks) mountain and nature trails and hiking. Based on Westmeath 3.41 P 4 and many other counties.

Note

As this POL/OBJ also relates to Commercial Forestry it should be cross- referenced to 9.7 Forestry.

#### 8.11 Peatlands

HER POLs 45 & OBJ 38

We submit that you should include additional POLS/OBJS:

1 Plan and prepare for the future use of large industrial bog sites when peat harvesting finishes as there is potential for the development of tourism amenities in conjunction with NPWS, Coillte and ESB/Bord na Mona. Based on Laois 5.10 OBJ12 & Longford 4.5 TOU 23 last pt. See also Westmeath 5.12 P 4 1s t sentence 1s t phrase.

2 Explore the potential for the development of new recreational activities and work in partnership with relevant stakeholders towards achieving a National Peat/lands Park. Based on Action Plan for Rural Development 2017 Pillar 3 Act 187 1s t phrase & Offaly 7.4 NHO 12.

3 Protect, conserve and manage the character, appearance, heritage and amenity values of peat/and landscapes by promoting high environmental standards in conjunction with the BnM, NPWS, Coillte, IPCC and NGOs. Based on 2013 Plan 9.7.6 1s t para 2nd sentence, Offaly 2.12 TP 06, Westmeath 5.12 PO 3 and many other counties.

#### 8.12 Geological Heritage HER POL 46

We submit that you should include additional POLS/OBJS:

1 Promote, encourage, facilitate and support access and public rights of way to geological and geo-morphological features of interest inter in consultation with landowners (where

appropriate). Based on Monaghan 6.12 GEP 1 1st phrase, Fingal 9.3 Obj NH 31, Louth 5.6 HER 9 and many other counties.

2 Work with stakeholders, to protect sites of geological or geomorphological interest from inappropriate development by prohibiting development at or in their vicinity or threaten their existence, integrity and conservation value. Protect, preserve, enhance, maintain, manage, conserve, and where

appropriate, restore the character (including County Geological Sites and sites that may become designated) or proposed NHAs areas near sites and areas of geomorphological interest from inappropriate development. Based on Planning & Development Act 2000 First Sch Part IV 6, Kildare 13.9 NH 16 & NH0 9, Wicklow Vol 1 10.3 Natural Heritage Strategy 3rd pt & 10.3.5 NH26, Westmeath 5.8 P2, Fingal 9.3 Obj NH30, Monaghan 6.12 GEP 3 & 4, Louth 5.6 HER 9 1st line, Fingal 5.3 COUNTY GEOLOGICAL SITES Text 4th sentence, Offaly 7.2.13 last para 1st sentence & 7.3 NHP16, Cavan 8.5 NME0 12 and many other counties.

We submit that you should include and additional Sub Sec: Eskers POLS/OBJS

1 Increase cycling and pedestrian access and maintain esker heritage.  
Taken from Westmeath 5.10 2.

2 Protect, preserve and conserve the landscape and natural heritage and geo-diversity values of esker systems from inappropriate development. Ensure that any plan or project affecting eskers is adequately assessed with regard to their potential impact on the environment. Taken from Laois 7.22 ESK1. See also Offaly 7.10 & Westmeath 5.10 P 1.

#### 8.13 inland Waterways

HER POL 47 We submit that you should add: Recognising the importance of inland waterways, both navigable and unnavigable, work with State Agencies, landowners, local communities and other relevant groups/stakeholders to protect, manage, maintain, preserve, conserve, improve and enhance waterbodies and watercourses, streams river valleys, lakes, springs and associated undeveloped riparian strips/zones, buffer zones distinctive linear sections of water corridors, canal and river banks, river and stream valleys and riverine from degradation and damage and the visual impact of dispersed and highly visible development that could adversely affect them by compromising their visual integrity, recreational, natural heritage, aesthetic, geological or landscape values and the natural characteristics and features and recognise and promote them as natural environmental assets, and maintain them free from inappropriate development. Keep them in an open state and in a natural condition by discouraging land filling culverting or realignment and in certain instances by uncovering existing culverts. Based on Monaghan 8.11 WPP 15, Kildare 14.8.5 WC 3 & 14.9.2 WV 3, Sth Dublin 8.2.0 Obj 4, Fingal 9.2 Obj NH24, Offaly 4.20 EnvP 23 & 7.3 NHP 13, Westmeath 5.16 P RLC3, pt, Cavan 8.9 NHE0 39 and many other counties.

We submit that you should include a Table of: Existing or potential riverside and lakeside walks/cycle routes. See Kildare 5.9.5 ECO 29 and many other counties.

We submit that you should include additional POLS/OBJS:

1 In partnership with the NPWS, WI, Councils, community groups and other relevant stakeholders, identify, provide, preserve, protect, promote, encourage, develop, maintain, facilitate, increase and improve public access to the shoreline around lakes and to rivers, canals and riparian /waterway corridors. Based on National Heritage Plan 4.17, Fingal 9.2 Obj NH25 1st phrase, Westmeath 5.16 P 4 5th line, Cavan 8.9 NHEP21 1st pt and many other counties.

2 Recognising the importance of rivers and river corridors for their natural amenity and scenic values, promote, develop and facilitate access for walking, cycling tracks and other compatible activities along inland waterways and in the vicinity of watercourses including rivers and canals in co-operation with landowners, WI, NPWS, Government Departments, community groups and other councils. Encourage the retention of existing walkways along lakes and rivers. Based on Offaly 7.16 ROWP 03, Louth 7.4 TC 25, Kildare 14.12.1 CR 7 and many other counties.

3 Support and facilitate the development of Greenways and Trails along (named) rivers. Taken from Sth Dublin 4.5.0 Pol 6 Obj 1.

4 Preserve and enhance an undisturbed buffer zone or riparian corridor by reserving land adjoining or adjacent to canal and river banks, streams, lakes and other waterbodies to protect them and promote and facilitate the creation of waterside linear parks to link with existing parks and open spaces and to facilitate the provision of walking/cycling routes along canals and watercourses and to facilitate and encourage public access for non-noise generating recreational activities. Based on Westmeath 3.16 P 8 & 6.2.7 O 5, Kildare 5.24 ECO 50, Offaly 7.3 NHP-13 1s t phrase and ,many other counties.

5 Protect and maintain the amenity and recreational value of walking and cycling routes by prohibiting the intrusion of development along these routes. \*Seek to ensure that new development will not have a negative impact on established walking routes and public rights of way along inland waterways.

It would be better if Seek to was omitted.

Based on Westmeath 5.16 P RLC14 2nd sentence, Kildare 14.12.2 RW 2 and many other counties.

6 Normally only permit proposals for development associated with water sports adjacent to lakes where the proposed facilities are compatible with existing use of water including non-recreational uses, will not result in damage to features of archaeological heritage, can be satisfactorily integrated into the landscape, will not have an unacceptable impact on visual amenities and will not result in over intensification of use leading to excessive noise. Taken from Laois 8.5 OM 34 .

7 As Water sports cover a wide range of activities from tranquil uses such as sailing, canoeing, rowing and sail boarding to powered activities such as water-skiing and powerboat uses, the Council may require management plans for particular areas to address the compatibility of such varying uses and may introduce bye-laws restricting or prohibiting jet-skiing and water skiing. Based on Kilkenny 7.3.4.1, Leitrim 3.10.3 4th para & Carlow 8.11.9 1st para 6th pt & 2nd para 1st line.

Note Mayo has bye laws

8 In areas adjacent to inland waterways, lakes, rivers, where planning permission is sought, the applicant must ensure that full public access to waterways is retained or conditions may be attached requiring retention of this access to facilitate creation or extension of walking/cycle routes. Based on Longford 6.2.27 ILW 5 2nd sentence & Dublin City App 23.9 2nd para last sentence.

9 Protect, enhance and improve existing public rights of way and, where possible, provide additional access to inland waterways including lake shores, river and canal banks, through the acquisition of land for public rights of way and parking and lay-by facilities, through agreement with existing landowners\*. Taken from Longford 6.2.2.7 ILW 5 1s t sentence & 6.

\*You should add: or by the use of compulsory powers.

#### CANALS

10 In co-operation with WI, NPWS and community groups, encourage, promote and use the potential of canal towpaths for designated walking and cycle routes, both as recreational amenities and the promotion of links with any designated walking cycling routes, existing or proposed. Based on Smarter Travel 2009-2020 Act 17 2nd sentence page 45, Kildare 5.9.5 ECO 29 and many other counties.

11 Ensure the conservation of canal corridors and require that developments abutting the canal relate to the context of the adjacent environment and contribute to its overall amenity. Taken from Galway City Pol 4.3 8th para 1s t phrase.

#### ROYALCANAL

12 Promote public use and facilitate and develop the towpaths along the Royal Canal as a Greenway in order to expand recreation and ensure their integration with other strategic trails including those in adjoining counties in co-operation/consultation with WI, NPWS, other relevant agencies and adjoining councils. Based on Action Plan for Rural Development 2017 Pillar 3 Act 168 1s t phrase, Kildare 5.9.5 ECO 33 & 5.19 E0 52, Westmeath 3.19 O TI6 & 5.16 P 11 & Fingal 6.9 Obj E069.

13 Work with WI to protect, enhance, preserve and restore natural heritage and landscape character of the Royal Canal by ensuring that development is appropriately managed by incorporating a visual assessment zone of 500m on each bank in which all development proposals are assessed for their impact on landscape character and adverse impacts on natural heritage, settings, views and prospects or its and recreational potential, including promotion, facilitation, maintenance and development of public use of the towpath for walking and cycling in consultation with WI, NPWS, adjoining Councils and other agencies. Based on Kildare 5.9.5 ECO 32, Westmeath 5.16 P 7 & 10 & 6 .11 O RCC1 & 2013 Plan 4.6.8 2n d para.

#### BOYNE/BLACKWATER

14 Develop the Trim-Navan-Slane-Drogheda cyclegreenway along the River Boyne. Taken from 2013 Plan 6.9 TRANS OBJ 8(iii) & (iv).

8.14 Wetlands HER POL 48

We submit that you should include additional POLS/OBJS:

1 Protect, conserve, manage and enhance existing wetlands(including fens, and estuarine marshland which are vital green infrastructure, from destruction, infilling, fragmentation, degradation and other inappropriate development and protect and conserve their quality, character and features by controlling adjacent development by use of buffer zones. Based on Sth Dublin 7.2.0.9, Offaly 7.3 NHP 11, Fingal 5.3 Obj RF 98 1s t sentence, and many other counties.

2 In partnership with the NPWS, WI and other stakeholders facilitate public access to wetlands and support and protect the recreational and amenity

potential of wetlands and provide for an intrinsic network. Based on 2013 Plan 9.7.10 POL21 and many other counties.

#### 8.15 Coastal Zone

HER POLS 49 & 50 & OBJS 40 to 44

We submit that you should include additional POLS/OBJS:

1 Prohibit inappropriate development where such development would significantly interfere with it which could cause damage to, or degradation of, beaches, estuaries or sand dunes, protected/designated landscapes, amenity areas and their recreational, ecological and amenity values or where it might affect the character, quality and distinctiveness of seascapes. Protect, conserve, safeguard and preserve the character, visual, environmental and amenity values, quality and distinctiveness of coasts, landscapes and seascapes as valuable local, enhance their visual and scenic qualities by protecting the skyline. Strictly control the nature and pattern of development and ensure that it is designed and landscaped to the highest standards and sited so as not to detract from the visual amenities. Development must accord with its surroundings in scale, density, height, massing, layout and must not have a detrimental impact on skylines or important views. Development shall be prohibited where development poses a significant or potential threat to coastal features and/or where the development is likely to result in altered patterns of erosion or deposition. Protect the structure and function of sand dunes and prohibit development that would damage their visual integrity. Based on NPF National Policy Obj 41a, Fingal 9.5 Obj NH 60 & 67, Wicklow 11.2 CZM5 and many other counties.

2 Work to protect beaches, within dunes and in other vulnerable areas manage and control car parking and vehicular movements. Based on 2013 Plan 9.7.11 POL 23 and many other counties.

3 Prohibit development of facilities for fishing and leisure developments where the siting of such installations and their supporting infrastructure would have a \*significant adverse impact on the natural heritage or detract from the visual amenity and the environmental quality and stability of an area or public access to beaches. Taken from Fingal 9.5 Obj NH66.  
\*material would be better

4 In assessing proposals for Water Sports Development ensure that the following criteria are satisfied: that proposals are fully compatible with existing use, will not result in damage to nature conservation or archaeological features, can be fully integrated into its seascape landscape, or will not have an unactable impact on visual amenity or important scenic

areas, or unduly restrict access. Taken from DLR 8.2.10.5 st para & 1st p t 1st phrase, 2nd pt, 3rd pt 1st phrase & 6th pt.

#### 8.16 Public Right of Way Text

We submit that you should include additional Text:

1 Public Rights of Way have existed over the centuries constitute an important recreational amenity. They enable the enjoyment of high quality landscape, natural and archaeological heritage and provide links to valuable amenities such as rivers lakes, bogs, forests and places of natural beauty. Based on Monaghan 5.11 2nd sentence, Fingal Chpt 5 5.3 Public Rights of Way 2nd para 1st sentence and many other counties.

2 A PROW or highway is a physically defined route over which the public have a right of

passage even if the route is not in public ownership. It is described as "a user as of right" and confers an unrestricted right of the general public to pass and repass at all times of the day or night and at all seasons without notice to, or permission from the landowner. The most common characteristic of a PROW is that it follows a defined route which may be sub-divided amongst different branches. Based on Wicklow Vol 1 10.3.8 2nd para 2nd & 4th sentences & last sentence 1st pt and many other counties.

3 The listing and mapping will preserve Public Rights of Ways for recreational purposes. Taken from Kerry 9.10 2nd para last sentence.

4 Section 14 of the Planning and Development Act 2000 sets out the formal process for designating rights of way in development plans. The scope of these statutory provisions is grounded on identification of existing routes over which PROWS are deemed to exist. The inclusion of PROW objectives for their preservation provides greater protection for such routes under development management provisions of planning legislation whilst also restricting the scope of certain exempt development. Taken from Wicklow Vol 1 10.3.8 3rd para .

5 The listing of public rights of way is an urgent matter as the lack of certainty on access has not only affected the rights of local people but has been the major cause of the failure of walking tourism to reach its full potential.

HER POL 51 We submit that this should be replaced by: Recognizing the importance of protecting, and maintaining public rights of way by their facilitating the development of walking trails in areas of high amenity value particularly in coastal areas, areas of high landscape values and those which provide access to archaeological sites, National Monuments, seashores, lakeshores, riverbanks, upland areas, water corridors or other places of natural beauty or recreational activity, Identify, maintain, preserve, protect, enhance, support, promote and improve them for the common good and

ensure that development does not impinge thereon as identified in Appendix 12L and Map 8.6.1 - 8.6.24. Ensure that they are effectively maintained by controlling undergrowth, trees and bushes. Based on Louth 7.5 text last sentence 1st phrase & TC 29 1st phrase, Monaghan 5.11 3rd sentence, & 5.11 CFP 19 1st phrase, Kildare 14.12.2 RW 1 1st phrase, & 2nd phrase and many other counties.

OBJ 45 We note that you are not proposing to include any additional public rights of way as per App 14. We submit that it is not too late to add to the List as we feel sure that there are many other traditional walkways which are designable. It is suggested that additions to the list should be compiled by following this modus operandi: Place an advert in local papers seeking submissions from the public to identify public rights of way which give access to seashores, mountains, lakeshores, riverbanks or other places of natural beauty or recreational utility. Identify existing rights of ways, paths, and access points to seashores, mountains, lakeshores, riverbanks or other places of natural beauty or recreational activity. Identify access points to seashores, mountains, lakeshores, riverbanks or other places of natural beauty or recreational activity which the Council have maintained or repaired with a view to identifying public rights of way. Carry out a desktop analysis of public records, maps, aerial photographs and newspaper accounts to identify reputations of public rights of way. Once the list is compiled, advertise and put it on display. The public will be invited to make submissions on the validity of the public rights of way.



Endeavor to verify and list the public rights of way and begin the formal process for designating rights of way under Section 14 of the Planning and Development Act 2000 (as amended).  
Vary the Plan to include the list and map showing the public rights of way.  
Taken from Cavan 8.10 NHE045.

We submit that you should include an additional POL/OBJ:  
Identify and map, on an ongoing basis, public rights of way and incorporate them in the Plan by way of a Variation. Where appropriate links to established public rights of way in adjoining counties will be identified.  
Taken from Westmeath 7.15 O 1.

BJ 46 We submit that this should be repositioned in 8.8 Natural Heritage and merged with proposed POL/OBJ 1.

We submit that you should include additional POLS/OBJS:

1 In accordance with the provisions of either Sections 206 or 207 of the Planning and Development Act 2000 encourage and facilitate the creation of additional rights of way and extend existing ones for pedestrian or amenity reasons, by investigating named areas to facilitate the development of waymarked ways and looped walks, by undertaking a review/survey of green

links and cycling routes and by bringing forward proposals within two years of the adoption of the Plan, either by agreement or by the use of compulsory powers, for the creation of public rights of way, particularly in areas of high amenity and recreational importance and to the Royal Canal, the Rivers Boyne and Blackwater the coast, uplands, seashores, lake shores, river banks, forests , heritage and scientific sites, areas of historic, archaeological and recreational importance and National Monuments, to create a meaningful network. Promote their greater use.. Provide linkages from built up areas to the countryside and the coast and link with public rights of way in adjoining counties. Based on Wicklow Vol 1 10.3.8 NH47 last sentence, Sth Dublin 9.4.0 Action, Westmeath 7.15 O 3 1s t sentence and excluding 2nd phrase Fingal 5.2 Obj RF120 and many other counties.

Note It is most important that public rights of way are marked on the ground because:

- 1 Walkers need to know of their existence to encourage usage
- 2 Signage would alert local residents to planning applications affecting the integrity of rights of rights of way
- 3 Directional signage during the course of the route would prevent involuntary trespass on private property and prevent walkers getting lost which might impinge on walker safety.

2 Protect and promote Greenways and consider designating them as public rights of way.  
Taken from Laois 7.21 PRW5 1s t phrase.

3 Identify mass paths and routes to holy wells, mass rocks and penal mass stations and consider designating them as public rights of way.

4 Encourage the provision for the common good of a network of Public Rights of Way to traditional outdoor amenities, including heritage sites and features of archaeological interest, national monuments, hills, rivers, forests, lakes, geological and geomorphic systems, water corridors, places of natural beauty and other natural amenities.. Tak en from Westmeath 7.15 P 1 1s t sentence 2nd phrase.

5 Prohibit development and keep free from obstruction public walking routes and public rights of way, particularly those at seashores, lakeshores, riverbanks or other places of natural beauty or recreational activity and take legal action if necessary , to prevent any attempt to close them off. Based on Carlow 5.3.2 Pol 8 i h p t, DLR 4.1.2.13 LHB14 4t h p t & Wexford 15.9 Obj RS36. Also See Kildare 14.12.2 RW 2 1s t phrase.

6 Look favourably on planning applications which include proposals to improve the condition and appearance of existing rights of way. Taken from Kildare 14.12.2 RW 4 and many other counties.

7 Existing Public Rights of Way and established walking routes shall be identified prior to any new forestry planting, new infrastructural, energy/telecommunications or golf course developments. Taken from Kildare 14.12.2 RW 3.

8 Development will not be permitted where a public right of way might be prejudiced, unless specific arrangements are made for suitable alternative linkages and that the developer can demonstrate that the level of amenity is maintained by:

- (i) the footpath/bridleway being diverted by the minimal practical distance and the route continues to be segregated from vehicular traffic;
- (ii) Appropriate legal procedures have been undertaken to extinguish the existing right of way and to establish the new right of way to replace it.
- (iii) the diverted route is of at least equal character and convenience. Based on Fingal 5.2 Obj RF118 2nd phrase and many other counties.

9 Where, in the interests of proper planning and development, the extinguishment of an existing right of way becomes expedient, the Council may require the provision of a suitable alternative. Taken from Galway City 4.5.1 4t h para 3r d sentence .

110 The Council will utilise its relevant statutory powers to preserve as practicable the character of listed public rights of way for amenity purposes. Taken from Wicklow Vol 1 10.3.8 NH46 1s t sentence .

## 8.17 Landscape

### 8.17.2 Policy Context HER OBJ 46

#### 8.17.4 Landscape Character Types and Areas

#### 8.17.5 Landscape Character Sensitivity

#### 8.17. 6 landscape Capacity HER POL 52 & OBJS 48 to 50

We submit that you should include additional POLS/OBJS:

1 Provide and increase managed public access to interesting and attractive landscapes or to semi-natural and landscape amenity areas for recreational purposes. Based on Fingal 9.2 High Amenity Zoning last pt and many other counties.

2 Where possible secure access to commonage and other hill land. Taken from Sligo 7.4 P CAP 7.

3 Preserve, maintain, enhance important landscapes and protect the amenity value, visual integrity of upland areas. Discourage inappropriate development in open countryside and prohibit developments which are likely to have material adverse visual impacts, either individually or cumulatively, on the character of the uplands. Ensure that development will not materially

interfere or detract from scenic uplands and that particular regard is had to potential impacts of new developments and require that proposed developments demonstrate that every effort has been made to reduce visual impacts(including excessive bulk and inappropriate siting) and that visually prominent sites have been avoided to minimise visibility from scenic routes, walking trails, public amenities, settlements and roads. Have particular regard to the potential impacts of development on sensitive upland areas and consider the difficulty of establishing and maintaining screening vegetation. Based on RSES EMR RPO 6.7 last phrase Kildare 14.8.3 LU 1, 4 & 5 and many other counties.

4 Preserve the status of traditionally open/unfenced landscapes including commonages and other hill land. Based on Wicklow Vol 1 10.3.7 NH42 1st phrase and many other counties.

5 Protect, conserve, preserve, maintain, identify and enhance the visual integrity, uniformity, scenic quality, general amenity and recreational values and the visual quality of areas of intrinsically important and outstanding, highly sensitive, designated, natural, unspoilt, visual vulnerable and open landscapes( named ), scenic areas, high amenity areas and the environs of archaeological or historic sites(named) from intrusive, inappropriate, injurious or unsympathetic new, or additions to, existing developments and reinforce their character and distinctiveness by prohibiting development where it could unduly impinge or impact on such landscapes or would be injurious to, or detract from natural amenities or introduce incongruous landscape elements. Based on Monaghan 6.5 HLP 9, Fingal Chpt 9 Obj 36 & 51, Louth 3.10.7 1, Sth Dublin 9.20 Pol 7, Kildare 14.8.1 LA 1 1st phrase, Westmeath 6.23 P HAA1 & 5, 2013 Plan 9.8.6 OBJ 1 2nd phrase, Cavan 8.7 NHE0 25 1st sentence, 8.8.1 NHE0 26 and many other counties.

We submit that you should include an additional Sub Sec: Fencing of Hitherto Open Land Text

1 It is a requirement of the Planning Regulations 2001 Art 9( /)(a)(x) that the

fencing or enclosure of land open to or used by the public during the ten

years preceding such fencing or enclosure for recreational purposes or as a means of access to any seashore, mountain or other place of natural beauty or recreational utility, requires planning permission. Taken from Kilkenny 6.2 Fencing 1st sentence. See also Sth Dublin 11.5.S(iii) 1st para .

2 Wire fencing constitutes visual pollution and destroys the "away from it all" feeling which makes upland areas such an attraction. Taken from Kilkenny 6.2 Fencing 2nd sentence.

3 There has been a large increase in the amount of new fencing in upland areas. Barbed wire has been used in most of this new fencing, which, in the absence of stiles or gates, makes access for recreational users of our countryside almost impossible. Traditional hill-sheep farming rarely required fencing, but since the introduction of AEOS, sheep-farmers must, in certain circumstances, stock-proof their land. The challenge is to ensure that such fencing will be done in a manner that will meet the requirements of AEOS without impinging on access for walkers and other recreational users.

POL/OBJ

As new fencing of land open to or used by the public during the ten years preceding is not exempt development in accordance with Art 9( /)(a)(x) of the Planning and Development Regulations the

following criteria will be used when considering planning applications for new fencing of hitherto open land : Fencing, particularly in upland, highly scenic or amenity areas, will not normally be permitted unless such fencing is essential to the viability of the farm. The nature of the material to be used, the height of the fence, and in the case of a wire fence the type of wire to be used will be taken into account.

Stiles or gates at appropriate places will be required. Barbed-wire will not be used for the top line of wire. Based on Fingal Chpt 5 Obj RF115 and many other counties.

Note As fencing may have a cross-county dimension it is important that this development plan should be in conformity with those in adjoining counties.

## CHAPTER 9 Rural Development Strategy

### 9.6 Agriculture

We submit that you should include additional Text:

1 Recognising the increasing demand for recreational space, commonage and other rough grazing land requires that this land shall be regarded

primarily as a recreational and amenity resource. Based on Galway City

4.6.2 1st para 1st sentence & Kilkenny 6.2 Commonage Land.

2 Farmers will be encouraged to see themselves as custodians of the countryside and the rural landscape which are a valuable resource for present and future generations and provides an amenity for enjoyment of the general population. Taken from Cavan 3.5 ED0 6 1st sentence.

3 Agriculture is an integral part of the management of large parts of the rural environment and landscape and provides an amenity for enjoyment of the general population. Taken from Leitrim 3.7.2 2nd para under Pol 61.

#### POLS/OBJS

1 Promote, at national level, the adoption of a Land Use Strategy.

Note: All EU countries(including Ireland) are under increasing pressure from the EU to comply with various EU Directives. In response to this Scotland adopted a Strategy in 2011. See the 2014 Report of the Joint Oireachtas Committee on Agriculture, Food and Marine page 10.

2 Protect and conserve rural amenities, archaeological and natural heritage, visual amenities, eco-systems , landscape, scenic views and the environment generally, from adverse impacts of agricultural practices and development particularly in high amenity areas and ensure that it is appropriate in nature and scale, ensure that it does not have an undue negative impact on the visual/scenic amenity of the countryside and identify mitigating measures where required. Integrate into the landscape, including the minimal use of signage. Developments and practices must be necessary for the efficient use of the farm and must ensure that they are conducted in a manner consistent with the protection of the environment and in line with national legislations and relevant guidelines. Based on Offaly 10.6 RD04 and many other counties.

### 9.6.2 Agricultural Development

9.6.2.1 Agricultural Buildings and Structures We submit that this should be re-entitled Agricultural Activities to better reflect its provisions.

HER POL 25

### 9. 7 Forestry

RUR POL 27 & 28

29 We submit that this should be replaced by: Forestry must not be visually obtrusive in the landscape so as to ensure that development is appropriate in its character, nature and scale and

that it is carefully managed so that it doesn't result in damage to visual amenity or have a negative visual effect on the rural environment and character of the countryside, must not cause pollution or degradation to wildlife habitats and that it must enhance and be

in harmony with the landscape. Protect scenic and exposed/elevated landscapes, protected scenic views and scenic routes, nature designations, vistas (including to water and valley approaches to the hills), geological sites, monuments and NHAs, areas of ecological importance, archaeological or other historical or heritage features. Based on Monaghan 4.6.1 AGP 7, 15.15 AGP 4, Kildare 10.4.5 last para 2nd sentence and many other counties.

30 We submit that this should be replaced by: Develop, promote, provide, protect, improve and encourage greater public access to new and existing forestry, both state and private, for recreational activities such as walking, hiking, cycling, and other non-noise generating activities and the provision of nature trails, as part of connected network of walking and cycle routes in cooperation/consultation with Coillte, the Forest Service, private landowners, local interest groups and other stakeholders and agencies. Based on Monaghan 4.6.1 AGR PB, Westmeath 3.41 P 4, 6.21 P 10 & 6.23 P 12 1st phrase, 2013 Plan 9.7.8 OBJ?, Sth Dublin 4.3.9.x and many other counties.

Note

We submit that you should new on 3rd line as this POL should also cover existing forestry.

POLS 31 & 32 & OBJS 38 & 39

We submit that you should include additional POLS/OBJS:

1 Retain existing rights of way and identify them and established walking routes before planting commences and maintain them as rights of way/walking Routes. Taken from Cavan 3.9 EDP15.

Note If this isn't done walking routes tend to become subsumed into the network of forest roads thus making it very difficult, over time, to establish the existence of these routes.

2 Ensure that existing public rights of way, traditional walking routes are not obstructed. Taken from Carlow 3.5.12 E.D 18 3rd para, Sligo 4.3.2 P 3 2nd sentence & Roscommon 3.4.2 Pol 3.44 1st sentence.

9.8 Tree and Hedgerow Protection

We submit that this should be repositioned in 8.9.6 Woodlands, Hedges and Trees

RUR POL 33 & OBJ 40 We submit that these should be merged with HER POLS 41742.

9.9 Extractive Industry and Building Materials Production RUR POL 38 to 41 & 43

44 We submit that you should add: Protect, conserve, preserve and safeguard archaeological sites and features and zones of archaeological potential, natural heritage, natural environment, features of natural beauty or interest, geological sites and areas of geological/geomorphological interest and areas of high scenic amenity from inappropriate development. Applicants must recognise that the aggregates (stone and sand/gravel deposits and mines) and concrete products industry have a particularly sensitive role in relation to the environment. Any development of aggregate extraction, processing, delivery must be carried out so that it minimises adverse effect on the environment and visual amenities to the greatest possible extent must be carried out during all life cycle stages, whether in respect of new quarries or extensions to existing ones and

development will be prohibited if the quality of the environment or landscape, particularly sensitive landscape, is adversely affected or there is a reduction of the visual amenity of areas of high amenity. All working should be landscaped either by the retention of existing vegetation or by screening.

Based on 2013 Plan 10.12 RD POL 27, Kildare 10.7.8 3 & El 4 & 5, Offaly

2.8.6 3rd para & 2.9 RDP 14 1st & 2nd sentence, 5.6 Wicklow Extractive industry Strategic Obj, 5.6 EX1 & Vol 3 App 13 Extractive Industry 1 1st para, Cavan 3.8 EDP6 & 7 and many other counties.

#### OBJ 41

We submit that you should include additional POLS/OBJS:

1 Applications for new development for aggregate extraction, processing and associated processes, shall identify existing public rights of way and walking routes which may be impacted on or are adjacent to the development site. They shall be kept free from development as a Rights of Way/Walking Route. Taken from Cavan 3.8 ED0 25.

Note

Pending a complete listing of public rights of way, walking routes, as prospective rights of way, should be protected.

2 Restrict development of aggregate extraction, processing and associated concrete production which could impinge or impact on matters of public importance, public rights of way or walking routes and satisfactorily address the potential impact on recreational activities.. Based on Monaghan 15.25 EIP 4, Kildare 10.7.8 El 5 last pt, Westmeath 3.43 P 11 last pt and many other counties.

### CHAPTER 11 Development Management Standards and Land and Use Zoning Objectives SECTION 6

#### 11.8.4 Extractive Industry

DM POLS 30 & 131 We submit that these should be repositioned in 9.9 Extractive Industry and Building Materials Production.

#### SECTION 8

#### 11.1 Energy Development

We submit that the POLS should be repositioned in the appropriate Sub Secs in 6.15.3 Renewable Energy: 37 to 39 and that the following OBJS should be similarly repositioned: 148 & 150 to 152.

146 We support the following pts: 2, 4, 8, 9 & last.

6th pt We submit that you should add: Take cognisance of public access to the countryside. Taken from Fingal 12.10 DMS138 (iv) 2nd phrase.

We submit that you should include an additional OBJS: Wind Energy

1 Take into account, when assessing planning applications, the impact on public access to the countryside including public rights of way, walking routes, recreational activities and amenities and the openness and visual amenity of the countryside. Based on Fingal 12.2 Renewable Energy DMS(iv), Monaghan 8.15 4th para & 4th pt and many other counties.

#### Hydro Energy

2 In assessing hydro energy schemes proposals the Council will take into account the impact on public rights of way and walking routes. Taken from Laois 6.6.1.1 HE1 & Carlow 6.3.2 Pol 6 2nd pt. See Kildare 8.6 HD 4 3rd pt.

#### Solar Power

3 In assessing development proposals ensure that it does not have a negative effect on the character of the landscape, natural heritage, views and prospects, scenic routes, archaeology, local amenities and the potential for mitigation through screening with hedges. Based on Fingal 7.3 EN14, Kildare 8.7 SE 1 2n d sentence & 2 1s t & 5th pt 5t h line , Sth Dublin 10.2.5 Pol 7 2n d sentence and many other counties.

11.10.3 Energy Networks

11.10.4 Telecommunications and Broadband

DM POL 40 We submit that this should be repositioned in 6.16.4 Telecommunication Antennae OBJ 155, 156, 158 & 159 We submit that these should be repositioned as for POL 40.

#### OVERVIEW

While we support the many excellent new provisions in the Draft, we have to say that we cannot understand why many of the provisions in the 2013 Plan haven't been carried to the Draft especially as they are quite uncontroversial. We would ask you to have another look at these to see if they could be included.

#### Chief Executive's Response

With consideration to the submission from Keep Ireland Open, all of the points raised have been examined and no amendments are recommended, other than a new Objective to facilitate the study of Mass Rocks and Holy Wells. It is considered that the wording used in the draft plan is consistent with that in the Act and that all statutory obligations have been met. The submission in summary promotes that access and admittance to the countryside is not limited.

The plan encompasses a significant number of objectives to facilitate access to and enjoyment of the countryside, appropriately balancing recreational use of the county's resources with the constitutional property rights of landowners, in a manner that is sustainable while protecting the integrity of the environment.

#### Chapter 2 Core Strategy

As noted above it is considered that the Draft Plan, including the core strategy has been prepared in line with the requirements of the Planning and Development Act 2000, as amended.

It should be noted that Meath County Council have engaged with adjoining local authorities in the preparation of the Draft Plan and as outlined in the plan, Meath County Council will engage with adjoining local authorities in the preparation and implementation of further plans and projects.

It is proposed as part of the CE Report to provide an index as part of the introduction to the development plan.

As part of the Draft Plan it is considered that these policies and objectives outlined as part of the Draft Plan as well as the development management measures outlined as part of Chapter 11 Development Management Standards and Land Use Zoning Objectives.

The layout of the Draft Plan is considered generally appropriate and the changes that are required have been outlined as part of the Chief Executive Report.

Compliance with ministerial guidelines has been outlined as part of Appendix 14 of the Draft Plan and any changes or updates that are required as part of this will be noted in the ERATA and will be subject to display as part of the material amendments process.



The Draft Plan is considered to be generally in compliance with the EMRA RSES 2019-2031 as noted in the response to MH-C5-60.

#### **Chapter 4 Economy and Employment Strategy**

Matters in relation to the development of small scale businesses in the rural area is addressed as part of the draft Plan and has been updated as part of the Chief Executive Report.

As part of the Draft Plan policies such as HER POL 28 outline the protection of the landscape and this has been addresses in a number of sections of the Draft Plan.

Section 4.24 – 4.29 addresses tourism and these sections address the importance of providing appropriate tourism development that is sensitive to the surrounding landscape. It is not considered that the proposed changes to these sections are required due to the contents of the Draft Plan addressing these matters.

#### **Chapter 5 Movement Strategy**

The request to replace MOV POL 17 and MOV OBJ 25 and 26 with the above recommended text is noted. Having reviewed this text, it is agreed that the points raised are addressed in a suite of policies and objectives in the Draft Plan (MOV POL 17 to MOV POL 2 and MOV OBJ 25 and MOV OBJ 32 refers)

#### **Chapter 6 Infrastructure**

##### **Energy Development – Wind Energy, Hydro Energy and Solar Power**

With regard to proposed policies relating to wind energy and hydro energy development, Meath County Council are committed to the preparation of a Renewable Energy Strategy during the lifetime of the Development Plan. This is supported by INF OBJ 47 of the Draft Plan. It should be noted that the DoHPLG published a draft Revised Wind Energy Development Guidelines for public consultation. To date, given that the Department is nearing completion of its review of the current guidelines, it is considered premature to prepare a Renewable Energy Strategy until such guidelines are adopted. When drafting the Renewable Energy Strategy, visual impacts on public rights of way and walking routes, landscape, natural heritage, views and prospects, scenic routes, archaeology, local amenities will be taken into account at a plan level and assessed in greater detail as part of the planning application process.

The request to replace INF POL 48 with the above recommended text has been assessed against existing policies and objectives. It is considered that INF POL 48 to INF POL 50 and INF POL 52 adequately encompass the points raised in the proposed text.

##### **6.13 Groundwater**

The protection of groundwater is supported by four policies and objectives within the Draft Plan, namely INF OBJ 19, INF POL 31, INF OBJ 3 and INF OBJ 37.

#### **Chapter 7 Community Building Strategy**

The issues raised in relation to community building and amenities are adequately addressed in Chapter 7 Community Infrastructure. It is not considered necessary to restructure or amend the chapter as suggested. Current policies with regard to leisure activities, cycling and walking, open space and burial grounds etc. are considered appropriate in this regard. The introduction of by-laws is outside the strategic scope of the Development Plan.

## Chapter 8 Cultural and Natural Heritage

### **(a) Reference to Planning and Development Acts 2000 (as amended)**

The objectives set out in Chapter 8 – Cultural and Natural Heritage are in accordance with the statutory requirements for the content of development plans as set out in the Planning and Development Act 2000 (as amended). The objectives within the draft plan are acceptable and address any of the issues raised under this topic. No change is necessitated.

### **(b) Format Issues**

It is considered that the plan is presented in an accessible and legible format. No change is necessitated.

### **(c) Titles and Objectives**

The titles and objectives set out in the draft plan are acceptable.

### **(d) County Heritage Plan**

Not within the remit of the CDP.

### **(e) Archaeology**

The policies and objectives of the current plan are considered acceptable.

### **(f) Mass Rocks & Holy Wells**

We acknowledge the importance and significance of Mass Rocks/Holy Wells throughout the county of Meath. A survey, both desktop and physical, should be carried out for the county. Holy wells contribute significantly to the social history of our land, with some having structural qualities worthy of recording, dating from the middle ages.

### **(g) Commonage**

The draft County Development Plan already addresses protection of the landscape and commonage. No change is considered necessary.

### **(h) National Monument and Recorded and Registered Monuments**

It is not necessary to list all national monuments within the plan.

### **(i) Woodlands, Peatlands, Geological Heritage, Inland Waterways, Royal Canal, Boyne and Blackwater Rivers, Wetlands and coastal Zone Policies and Objectives**

The policies and objectives of the current plan are considered acceptable.

### **(j) Natural Resources**

The objectives in the plan in relation to recreational use of natural resources are acceptable. No change is necessitated.

### **(k) Public Rights of Way**

It is considered that the objectives of the draft County Development Plan adequately address public ROWs and accessibility. No change is therefore recommended.

### **(l) Landscape**

The objectives set out in the current plan in relation to landscape are considered acceptable and address the issues raised.

### **(m) Views and Prospects**

The objectives set out in the current plan in relation to views and prospects are acceptable and address the issues raised.

### **(n) Peatlands**

With respect to the future use of large industrial bog sites, please refer to MH-C5-764 from Bord Na Mona for supportive text on the re-use of cutaway bogland.

## Chapter 9 Rural Development Strategy

The issues raised in relation to the Rural Development Strategy are noted. The policies and objectives prescribed in the rural development strategy, including those relating to forestry and extractive industries affords sufficient protection to the countryside, rural landscape and

environment. It is not considered necessary to amend the Chapter as put forward.

### **Chapter 11 Development Management Standards and Land Use Zoning Objectives**

MCC note the editorial suggestions in respect of Extractive Industry and Energy Development sections of Chapter 11. A number of editorial changes have been made to this chapter as per the suggestions made. In summary the amendments are proposed in order to simplify the chapter and to avoid repetition of text / objectives / policies where necessary.

Wind Energy has been the most significant source of renewable source of electricity. The Council will continue to support and encourage the principle of development of wind energy in accordance with Government policy and having regard to the provisions of the Landscape Characterisation Assessment of the County and Wind Energy Development Guidelines (2006).

Hydro Energy: The Council encourages the use of rivers where suitable, within the County for the development of hydro energy and will be supportive of developments along the banks of rivers which propose hydro energy to provide an element of their energy requirements. It is an objective of the Council (DM OBJ 146) to take into account the impact on public rights of way and walking routes. Please see OBJ 146 for additional considerations for energy development.

CHAPTER 11 Development Management Standards and Land and Use Zoning Objectives

Solar Energy: As above. DM OBJ 146 will consider the impact on protected views and prospects, impact on the landscape, environmental and social impacts, public rights of way, connection to the National Grid and protection of designated areas (NHA's, SPA's, areas of archaeological potential and scenic importance.

### **Chief Executive's Recommendation**

#### **Chapter 8 –**

New Objective to be included: **HER OBJ 14** Commission a study over the lifetime of the Plan to assess the significance of the Mass Rocks and Holy Wells throughout County Meath.

No other changes required to Chapter 8

**Submission No.:**

MH-C5-47

<b>Submitted by:</b>	Cllr Noel French
<b>Submission Theme(s):</b>	Chapter 8 – Cultural and Natural Heritage Strategy
<b>Summary of Submission:</b>	
<p>All of the wells listed below have structures associated with them- some structures date back to seventeenth century some to eighteenth and nineteenth century and a few from the twentieth century.</p> <ol style="list-style-type: none"> <li>1. St. Patrick's Well - The Green at Carlanstown, opposite the National School</li> <li>2. St. Patrick's Well - The Hill of Slane</li> <li>3. St. Patrick's Well - on the banks of the river Boyne upstream from the town of Trim.</li> <li>4. St. Colmcille's Well - at Kells is located on the road to Oldcastle</li> <li>5. St. Colmcille's Well at Shallon is located on the old road between Duleek and Julianstown.</li> <li>6. St. Brigid's Well at Ardsallagh, Navan, is located to the south of the house, not far from the River Boyne.</li> <li>7. St. Brigid's Well, St. Bride's Well, at Johnstown House, Enfield</li> <li>8. St. Brigid's Well at Iskaroon, Dunderry, is located near the site of the church and graveyard of St. Brigid</li> <li>9. St. Brigid's Well, Kilbride. A well, near the gate of the graveyard at Baytown, is called St. Brigid's Well.</li> <li>10. St. Brigid's Well, Kilcloon parish, about two miles from Kilcock, is located in an area named Brideswell.</li> <li>11. St. Brigid's Well is located near the old church at Martry.</li> <li>12. St. Kieran's Well - About three miles from Kells, near Carnaross, there is a holy well dedicated to St. Kieran.</li> <li>13. St. Finian's Well, Clonard St. Finian moved his monastery to the hill called Church Hill and the well on the eastern side is now the holy well.</li> <li>14. Lady Well - Near Killeen Castle there is a well named Tobar Muire, recorded by John O'Donovan in the 1830s. It was also known as Lady Well</li> <li>15. Our Lady's Well, Killyon - In Killyon Manor grounds Lady Well is situated at the side of the avenue to the house, near the graveyard.</li> <li>16. Our Lady's Well, Slane - At Slane the Lady Well is situated in the Castle Demesne along the banks of the river Boyne.</li> <li>17. St. Anne's Well, Randalstown - three miles north of Navan, near the tailing pond of Tara Mines</li> <li>18. St. John's Well, Mornington is located in the Glen.</li> <li>19. St. John's Well, Warrenstown</li> <li>20. St. Ultan's Well, Ardbraccan stands just outside the churchyard wall, within the demesne of</li> </ol>	

#### Ardbraccan House

21. St. Odran's Well, Dunshaughlin

22. St. Dymphna's Well, Kildalkey

23. St. Nicholas's Well, Culmullen The well is located on the lane leading to the old church and graveyard of Culmullen.

24. St. Nicholas's Well, Tullaghanogue. Tullaghanogue church, located between Trim and Athboy, was dedicated to St. Nicholas. To the east of the church is a well called Tobernuaclas which was dedicated to St. Nicholas.

25. St. Kevin's Well, Clonabreany On the roadside opposite Clonabreany graveyard there is a well dedicated to St. Kevin.

26. St. Michael's Well, Dunboyne is located in the centre of Loughsallagh graveyard, on the Dublin road out of Dunboyne.

27. St. Scire's Well, Kilskyre. located just off on Kilskyre-Clonmellon road just outside Kilskyre.

28. Tubberbarry, Moy, Summerhill - There was a well just outside the east wall of the Moy cemetery, at a spot where there is now a hawthorn tree and a depression in the ground.

29. Tobar Naomh Vinog –Summerhill - At Basketstown, Summerhill there was a holy well named Tobar Naomh Vinog. The well was known by a number of names: Tobernaveenog, Havana Well, Basketstown Well, Tobarna Brinog and Tobar Naoimh Ana.

#### Chief Executive's Response

Meath County Council acknowledge the importance and significance of Mass Rocks/Holy Wells throughout the County Meath. A survey, both desktop and physical, should be carried out for the county. Holy wells contribute significantly to the social history of our land, with some having structural qualities worthy of recording, dating from the middle ages.

#### Chief Executive's Recommendation

New objective to be included:

**HER OBJ XX Commission a study over the lifetime of the Plan to assess the significance of the Mass Rocks and Holy Wells throughout County Meath.**

<b>Submission No.:</b>	MH-C5-303
<b>Submitted by:</b>	Devenish
<b>Submission Theme(s):</b>	Chapter 8 – Cultural and Natural Heritage Strategy
<b>Summary of Submission:</b>	
Devenish, believe that having World Heritage Site (WHS) status for Brú na Bóinne can and should benefit all participants and stakeholders. The submission states that having attended a recent public meeting held by the Brú na Bóinne Consultative Committee about the Consultative Committees' engagement with the Department of Culture, Heritage and the Gaeltacht and Meath County Council over the past number of years. It was positive to hear that there has been strong	

community input into the decision-making processes and outcomes of the management of the World Heritage site at Brú na Bóinne and to hear that this work is reflected in the new Brú na Bóinne WHS Management Plan and the proposals in the Draft County Development Plan for Meath.

1. It is asked that in relation to HER POL 9 of the Draft County Development Plan for Meath and that the words “only for those involved locally in full time agriculture” be deleted as it is contended that this is overly restrictive. Firstly, the farming business model is particularly challenging in these times and throughout the country there are fewer and fewer people who engage exclusively in full time agriculture. Secondly, there are enough checks and balances in the planning process to ensure the protection of the WHS and that only reasonable sustainable and appropriate economic growth will be permitted in the WHS so it is not necessary to insert this extra restriction. Thirdly, we need creative thinking and collaboration to turn the potential of the WHS into benefits for all participants and stakeholders. A stipulation that restricts proposals to only those involved in full time agriculture significantly reduces the opportunity for creative discussion and collaboration.
2. It is suggested that in order to streamline the development management process and ensure the sustainable management of the WHS, (referencing HER POL 3, HER OBJ 2, HER OBJ 8 and HER OBJ 7), it would be helpful to provide supports for the local community, in particular, the creation of a County Council position of WHS Archaeologist/County Archaeologist, and the establishment of a fund for pre-planning investigation. The WHS archaeologist could be a first point of contact, liaising with the local community, and providing information and advice regarding the archaeological potential of proposed development sites. If potential archaeological features are identified during the pre-planning phase, the WHS archaeologist could give them a sense of the likelihood of their application being successful, they could help to identify alternative locations (with less archaeology), and they could explain the potential financial implications of proceeding (e.g. cost of excavation). As more sites within Meath (e.g. Tara, Kells) may be inscribed on the WHS list in the future, this role would become even more necessary.  
A WHS pre-planning investigation fund could be set up, which landowners could avail of to help offset some of the pre-planning costs such as environmental impact assessments, geophysical survey etc. This is justifiable as people within the WHS are more likely to be asked to do this work than in other parts of Ireland. This pre-planning investigation should be considered as benefitting the WHS by increasing our archaeological knowledge of the area.
3. It is noted the first paragraph of section 8.6 which refers to archaeology saying “*It is most useful for periods and civilization’s that existed prior to written records*”. It would be better to delete this sentence as it implies that archaeology is less useful when there is a written record. Written records only form part of the narrative of the past, and usually represent the voices of those in power. Archaeology helps to understand the lives of people who are often silent in the written record.

#### Chief Executive’s Response

1. Meath County Council acknowledges the issues and concerns with regard to this policy (HER POL 9) in limiting one off housing development solely to those involved locally in full time agriculture. There is however scope for housing development other than connected to agriculture, HER POL 7; *‘To encourage the retention, conservation, and appropriate re-*

*use of traditional buildings within the UNESCO World Heritage Site of Brú na Bóinne in preference to either their replacement, or the construction of new buildings on green field sites.'* The policy (HER POL 9) does not restrict the range and/or types of agriculture proposed and does not refer only to traditional practices. HER POL 8 *'To ensure that development within the UNESCO World Heritage Site of Brú na Bóinne shall be subject to the Development Assessment Criteria set out in Appendix no. 8 and the Development Management Guidelines in Chapter 11.'* Allows for proposals for developments other than and including agriculture to be assessed as per any Planning Application.

2. We acknowledge the suggestion regarding a County Council position of a WHS Archaeologist and the potential help and support it could provide for the community. The Bru na Boinne Management Plan (2017) is an ongoing discussion with local communities and is perhaps the best vehicle for making the business case for and establishing such a role, the plan having a ten-year lifespan with a review after 5 years (2022). The Plan contains within it a commitment to set up a Community Forum to highlight issues of concern to the local community, to review the implementation of the Management Plan, to consider proposed on-site work programme, to advise on future objectives and to provide a representative to the Implementation Group.  
Creating an archaeological investigation fund within this framework could also be managed and overseen by a WHS archaeologist. The Management Plan is part of the County Development Plan see Appendix 8 and it can be viewed at [consult.meath.ie](http://consult.meath.ie)
3. We acknowledge the suggested revision of paragraph 8.6 and Chief Executive agrees to remove the sentence *"It is most useful for periods and civilisations that existed prior to written records"*, as it is misleading regarding archaeology being less useful when there is a written record.

#### **Chief Executive's Recommendation**

1. No change required.
2. No change required.
3. Paragraph 8.6 within Chapter 8 to be reworded as 'Archaeology is the Archaeology is the study of human societies through the investigation and analysis of the material evidence left behind. ~~It is most useful for periods and civilisations that existed prior to written records.~~ The archaeological heritage of an area includes monuments, sites, and objects whether situated on land or under water. In this respect, the County has a significant archaeological heritage, and provides a valuable cultural, educational and tourism resource'.

<b>Submission No.:</b>	MH-C5-432
<b>Submitted by:</b>	Grainne Downey
<b>Submission Theme(s):</b>	Chapter 8 – Cultural and Natural Heritage Strategy
<b>Summary of Submission:</b>	
It is submitted that the objectives of the Plan to balance the protection, conservation and management of the UNESCO World Heritage Site of Brú na Bóinne with the area's economy and society is appreciated. The area's current and future inhabitants should not be placed at either an	



economic, cultural or societal disadvantage. The submission raises three points:

1. In areas outside of Brú na Bóinne, it is the policy of the Council to “support the continued vitality and viability of rural areas by promoting sustainable social and economic development” (RUR POL 1). However, the inhabitants within the Bru na Bóinne area are specifically discriminated against if they are not involved locally in full time agriculture (HER POL 9). It is broadly recognised that full-time agriculture is becoming increasingly non-viable and many involved in agriculture require off-farm income to survive. This Policy positively restricts and discriminates against those who are living in the area from building a home and continuing to live in the area unless they are “involved locally in full time agriculture”. Without homes and habitation this area will not be a living landscape, it will not have a “cultural” heritage into future generations.

2. Modern agriculture extends beyond the traditional and will continue to evolve and change into the future e.g. agricultural diversification, agri business, agri tourism, eco-tourism, renewal energy etc. While maintaining a respect for, and protection of, the unique and sensitive Bru na Bóinne area, this policy should not restrict that evolution.

3. This policy, or a policy within this section, needs to make specific commitments in consideration of the modern infrastructure required to support the continued viability and vitality of the community e.g. broadband, energy, infrastructure.

It is submitted that:

- this policy is broadened to consider the local community working in agriculture, agricultural diversification or tourism, rather than solely those involved locally in full time agriculture.

- That this policy, or associated policy of objective, commits to the provision of the modern infrastructure required to support the area’s community e.g. broadband, energy, infrastructure.

- A specific partnership forum is established to partner and work with the farming community in the joint achievement of the policy objectives to identify, protect, conserve and manage the cultural and natural heritage of the County; to encourage its sensitive integration into the sustainable development of the County for the benefit of present and future generations; to balance conservation with economic prosperity and social integration.

#### **Chief Executive’s Response**

1. The primary policies and objectives for the UNESCO World Heritage Site of Brú na Bóinne relate to the preservation of its Outstanding Universal Value. Meath County Council acknowledges your concerns with regard to this policy (HER POL 9) in limiting one off housing development solely to those involved locally in full time agriculture. There is however scope for housing development other than connected to agriculture, HER POL 7; *‘To encourage the retention, conservation, and appropriate re-use of traditional buildings within the UNESCO World Heritage Site of Brú na Bóinne in preference to either their replacement, or the construction of new buildings on green field sites.’* The plan has an objective *‘To actively support and encourage the re-use of vacant and derelict dwellings within the Core and Buffer Zone of the World Heritage Site of Bru na Bóinne by providing assistance and professional advice to owners seeking to re-develop such sites (HER OBJ 10)’*. In addition, Meath County Council has revised its policy in relation to residential extensions by removing limits on the percentage of existing floor area increase – (See HER POL 10).

2. The policy (HER POL 9) does not restrict the types of agriculture proposed and does not

refer only to traditional. HER POL 8 *‘To ensure that development within the UNESCO World Heritage Site of Brú na Bóinne shall be subject to the Development Assessment Criteria set out in Appendix no. 8 and the Development Management Guidelines in Chapter 11.’* allows for proposals for developments other than and including agriculture to be assessed as per any Planning Application.

3. With regard to modern infrastructure to support the continued viability and vitality of the community, HER POL 8 *‘To ensure that development within the UNESCO World Heritage Site of Brú na Bóinne shall be subject to the Development Assessment Criteria set out in Appendix no. 8 and the Development Management Guidelines in Chapter 11.’* Allows for proposals for developments of any kind to be assessed as per any Planning Application.

In relation to agricultural diversification or tourism, broadband, energy, infrastructure. HER POL 8 *‘To ensure that development within the UNESCO World Heritage Site of Brú na Bóinne shall be subject to the Development Assessment Criteria set out in Appendix no. 8 and the Development Management Guidelines in Chapter 11.’* Allows for proposals for developments of any kind to be assessed as per any Planning Application.

The Bru na Bóinne Management Plan (2017)

The Bru na Bóinne Management Plan (2017) is an ongoing discussion with local communities and contains within it a commitment to set up a Community Forum to highlight issues of concern to the local community, to review the implementation of the Management Plan, to consider proposed on-site work programme, to advise on future objectives and to provide a representative to the Implementation Group. The Management Plan has a ten-year lifespan with a review after 5 years (2022). The Management Plan is part of the County Development Plan see Appendix 8 and it can be viewed at [consult.meath.ie](http://consult.meath.ie).

#### Chief Executive’s Recommendation

1. No change required.
2. No change required.
3. No change required.

<b>Submission No.:</b>	MH-C5-470
<b>Submitted by:</b>	Peter Mooney
<b>Submission Theme(s):</b>	Chapter 8 – Cultural and Natural Heritage Strategy
<b>Summary of Submission:</b>	
1. This submission from a member of the local community and is centered around his life-long experience of living in proximity to the mounds. It is stated that in his view the restrictive mindset that has existed for decades in terms of management of the area lacks vision. It is stated that visitor centre should just be a single stop-off point on a much more expansive and enjoyable visit to many more sites and locations in the Boyne Valley. It should be so much more like the megalithic standing stones and interpretive centres in Carnac in France and our vision should look outside of Ireland to better management systems of World Heritage Sites. A new inclusive	

mindset needs to be fostered expanding the It is stated that the biggest stakeholder in any World Heritage Site is the Living Community and if you don't have their support through inclusion, it is extremely difficult to achieve goals and progress. An inclusive vision and plan is the only way forward.

2. It is stated by the author that he is a member of the Boyne Valley Consultative Committee and is fully supportive of their submission to the CDP which is appended to his submission as an individual and member of the community living in the area.

#### **Chief Executive's Response**

Meath County Council notes the points raised in relation to decisions concerning the WHS and has always sought to strike a balance between the needs of the local community with our responsibility and obligation to protect the Outstanding Universal Value of the World Heritage Site. The Draft County Development Plan provides detailed policies, objectives, and development assessment criteria and it is considered that these, together with the Brú na Bóinne Management Plan, provide a framework for the management of the area. The following examples in respect of Brú na Bóinne in the draft plan shall demonstrate this:

- A proposed revision to the existing policy in relation to extensions and alterations (HER POL 10); designated a rural node in Monknewtown;
- Committed to actively supporting and encouraging the reuse of vacant dwellings by providing assistance and professional advice to owners seeking to re-develop such sites (HER OBJ 10);
- Committed to preparing and implementing a Business Plan for the WHS in conjunction with relevant stakeholders subject to funding (HER OBJ 12);
- Committed to encouraging and facilitating pre-application discussions in conjunction with the Department of Culture, Heritage and the Gaeltacht, regarding the siting and design of developments affecting the WHS (HER OBJ 8) in addition to working in partnership with the community and all other relevant stakeholders to promote, understand, conserve and sustainably manage the WHS.

Meath County Council acknowledges that the local community are a key stakeholder in the WHS and are committed to supporting the Department of Culture, Heritage and the Gaeltacht and all stakeholders by working together to implement the Bru na Bóinne Management Plan (HER POL 11).

Support for the Boyne Valley Consultative Committee submission is acknowledged and the response to this submission is in MH-C5-745.

#### **Chief Executive's Recommendation**

No change required.

<b>Submission No.:</b>	MH-C5-585
<b>Submitted by:</b>	Tara Skyrne Preservation Group (TSPG)
<b>Submission Theme(s):</b>	Chapter 8 – Cultural and Natural Heritage Strategy

#### **Summary of Submissions:**

Tara Skyrne Preservation Group is a diverse group with the aim to protect, preserve and maintain Irelands ancient capital.

This submission proposes a number of suggestions in relation to the future development of Meath specifically an area north of Dunshaughlin and Ashbourne across to Kilmessan and south

of Navan and Slane. It is proposed that this area will represent a 'Green Heart' area which is protected from intensive development including;

- No new motorways;
- No large-scale housing estates; and
- A local area development plan.

It is stated that this will allow certainty and attract high value companies who value lifestyle as an incentive for their highly sought after staff.

The following sets out the support and / or comments to a number of objectives outlined in the draft Plan.

**CS OBJ 15 Cannot happen because of the current Leinster Orbital corridor plans;**

TSPG support the Leinster Orbital but it proposed routing 70% of the proposed reserved corridor for the Leinster Orbital is located between Tara Landscape Conservation area and the Boyne, Bru na Boinne.

If the current corridor route is locked in, Meath will once again lose out on the economic advantage of having motorway access by building in Archaeological and Conservation areas.

**CS OBJ 16**

TSPG are extremely supportive of live-work communities but attracting the right mixture of jobs to suit Meath's education level mixture.

With the M3/Leinster Orbital bringing traffic through a development area North of Navan, allowing businesses to grow without moving too far and then bring in Shared Workspaces/Start up parks in the smaller towns like Dunshaughlin and Ashbourne, it can encourage not just Tourism start-ups but also companies that need to be close to Dublin and the Airport but cannot afford Dublin.

**CS OBJ 17**

Building a rail line in the median strip of the Motorway would link Dublin – Kilcock (already exists) Navan – Slane – Drogheda – Belfast – Dublin

**SH POL 03**

By implementing the Tara LCA and protecting the Archaeological Landscape from over development, with settlements and towns radiating from the green centre, you achieve both protection of landscape and a green lung and activity area close to the towns.

**SH OBJ 11**

By downgrading the N2, banning all HGV traffic after Ashbourne and instead prioritising a link road to the M3 and the proposed Leinster Orbital, Ashbourne's need for connectivity to both North and Airport would be met.

By implementing a Green Heart strategy it's easy access to the LCA and Green Areas is a huge

selling point for high value industries that rely on quality of life to attract the best talent to their companies.

#### **SH OBJ 11**

To continue to support the transition of Ashbourne towards a Metropolitan Settlement by supporting its development as an enterprise and employment hub and by strengthening links and connectivity between Ashbourne and Dublin Airport and City Centre and the wider Metropolitan Area.

#### **SH POL 04**

In the Green Heart strategy, TSPG notes that Meath does shockingly bad at providing low skill jobs in tourism due to lack of tourist infrastructure meaning that Tourist's come to Bru Na Boinne and Tara and go back to Dublin on the Bus Eireann tour.

The green heart area with transport network used for both tourism and local transport, along with small tourism initiatives provide the perfect easy weekend or even night away escape.

#### **Healthy Communities**

By making development radial around the Archaeological landscapes and by limiting traffic on the Ashbourne to Slane section of the N2, residents of the Greater Dublin commuter towns have access to the greatest indicator of mental health - Green space.

#### **ED POL 4: Leinster Orbital Corridor**

TSPG propose moving the Leinster Orbital north of Navan where a new development area would have access the M3 to the Airport, the LO/M1 to Belfast, the LO/M1 to Dublin, the LO/M4 west and the LO/M7 (if brought down that far) to Cork/Limerick.

#### **ED POL 6**

To ensure that people intensive developments are located close to strategic public transport networks.

#### **ED POL 8 Small Businesses need to grow and Meath need jobs for its unskilled workers as well as skilled**

Small Start-up business parks with receptions, meeting rooms, video conferencing, accountancy and mentoring will allow small indigenous businesses to grow and bring new start-ups from Dublin. these will suit Dunshaughlin and other small towns with easy access to the airport.

#### **ED OBJ 6**

Ideally, the M3 would reroute the Leinster Orbital and we would turn the Tara LCA into a 10 miles of wandering and wondering, with a coffee or a hot whiskey on the way.

#### **ED OBJ 22**

To seek to maximise the tourism potential of the significant hub within the Boyne Valley region

which includes the UNESCO WHS Bru na Boinne, the Battle of the Boyne site and the coastal area of East Meath.

#### **ED OBJ 23**

To promote the key town of Navan as a primary centre of employment in the County so that its significant residential population will have employment opportunities within easy distance of their homes, thereby reducing outbound commuting.

#### **ED POL 18**

TSPG strongly support this but believe an NZ style insurance system would greatly benefit small tourism operators. Also the provision of tourist buses, allowing people to relax and have a drink with food.

#### **ED POL 39**

The T4 Service Area is a great opportunity to have a central area where people can easily connect with small tourism operators and a central point where Bus Eireann can drop people off and small tourism buses can bring people into the different area.

#### **ED POL 40**

Small tourism booths and using transport to book and provide a drop on drop off service to local businesses

#### **ED POL 44**

Using the T4 Service Station on the M3 as a hub for small tourism and Drogheda, Navan, Dunshaughlin, Trim, Ashbourne as gateway entry points with affordable and interesting accommodation, you can keep tourism within Meath rather than as a one-day trip from Dublin

#### **ED POL 48**

Meath should use the Irish genealogy in the peaceful protest movement including the world's 1st million person march in 1843 and its influence on Gandhi and the American anti-slavery

#### **ED POL 56**

Use of visitor centres at gateways with transport to visit the monuments will allow visitors to experience the history and minimise the amount of time at the monuments.

#### **ED OBJ 73**

Using Gateways and small tourism we can bring people in but concentrate their time at less vulnerable monuments.

#### **ED POL 57**

To work with the National Transport Authority (in conjunction with relevant objectives in Chapter

5 Movement Strategy of this Development Plan), Boyne Valley Tourism, Fáilte Ireland, Waterways Ireland and all stakeholders to develop a co-ordinated approach to the selection, delivery and servicing of future greenways, blueways, trails and throughout the County

**RPO 8.7: Behavioural change is only possible when a simple holistic strategy is created**

It is in the interests of everyone in Meath to have a green lung surrounded by gateway towns that can continue to grow outward from the Green heart meaning they will always have an access to green areas and a great lifestyle

RPO 8.10 don't repeat the mistakes of the M3 Leinster Orbital corridor

As per RPO 8.4 the Leinster Orbital corridor plan needs to be AA (as has not been as part of the greater Dublin Area plan) and also is the worst possible route being lodged between the Boyne Natura SPA and both Tara Landscape Conservation Area and Bru Na Boinne UNESCO site.

- **MOV OBJ 49 - Strongly support connector between M3 Dunshaughlin - M2 Ashbourne and M1.**
- **MOV OBJ 57 - Freight requirements should be considered along with Leinster Orbital planning**
- **SOC OBJ 1 - Facilities should be cross use as local, tourism and community building events are compatible**
- **SOC POL 39 - Should also include archaeological areas.**
- **SOC OBJ 27 - See TSPG GreenHeart Small Tourism section.**
- **SOC OBJ 28 Writers retreats require peace and opportunities to ramble in rural environment**
- **8.5.1 TSPG Strongly believes that Record by Preservation is simply destruction.**
- **HER POL 2 - It is not enough to protect archaeological areas but to educate and plan.**
- **HER POL 4 - This is of no use if expert archaeological advice is ignored as was the case of Conor Newman and Discovery programmes "worst possible route" M3 testimony.**
- **HER POL 5 Why not put a strategy for unrecorded monuments beforehand?**
- **HER OBJ 3 - Do not Seek to.. Do. Meath can lead the world in best practice by not leaving cracks where cultural vandalism seeps through**
- **HER POL 6 - To protect the Outstanding Universal Value of the UNESCO World Heritage Site of Brú na Bóinne. The Leinster Orbital proposed routing will affect its value and is inappropriate development.**
- **HER POL 9 - TSPG believes this would be dealt with better by a Local Community Development plan in conjunction with a Landscape Conservation area.**
- **HER OBJ 9 - Also should include any large developments such as the Leinster Orbital and Slane Bridge and Bypass within 15 Km of Bru Na Boinne**
- **HER OBJ 11 - TSPG look forward to seeing more information about the Slane Bypass bridge.**
- **HER OBJ 12/13 The UNESCO Tentative sites are in oversubscribed categories in Europe, this nomination appears be political move to pretend to protect Tara at a time when 98% of Irish people were distraught at desecration of the landscape**
- **HER POL 32 the proposed Leinster Orbital Corridor is adjacent to the Boyne SPA**
- **HER OBJ 32 AA and other legislative processes has not ever been performed on the Leinster Orbital**
- **HER OBJ 33 – Land for the Leinster Orbital corridor is being reserved but it should be**



examined whether it has an adverse impact on plants, animals or birds in the Boyne SPA

- HER POL 42 - Why are the fairy trees of Tara not on this?
- HER POL 46 Why is Rath Lugh Ice Esker not on the list of County Geological Sites?
- HER POL 54 - The draft Tara LCA was extremely effective in allowing Halcrow Barry to understand that 2 of the 5 M3 T4 Service Areas proposals were in or too near the Tara landscape and therefore inappropriate.
- HER OBJ 51 - Strong supportive of bringing legal effect to the Tara Landscape Area but ensure local communities can develop with a LCDP
- HER OBJ 54 Using experience tours to Tara, you can control numbers of tourist visitors and bring people to different parts of the hill
- HER OBJ 53 - Conservation must support the open nature of Tara to Irish people
- HER OBJ 55 St Patrick to the Hill of Slane and Rath Lugh is ruined by the M3 embedded in Rath Lugh.
- RUR POL 42/RUR POL 44 Rural Nodes for the Tara LCA are in multiple districts. Need to dealt with coherently as Landscapes.
- 11.10.3 Energy Networks and EV Charging Points can benefit local entrepreneurs.

#### **Chief Executive's Response**

##### **Leinster Orbital Route**

It is requested as part of this submission that Meath County Council should adopt of a strategy of providing a green heart in the centre of the county so as to prevent the development of infrastructure such as the Leinster Orbital Route. It is considered by the submission author that infrastructure such as this would impact on the landscape character of the area. In relation to the Leinster Orbital Route, the Draft Plan is explicit in its support of the Leinster Orbital route through MOV POL 23 and MOV POL 34. Notwithstanding this, the Chief Executive notes that the Leinster Orbital Route Feasibility Study, completed in 2007, was carried out in the context of the national planning policy of its time, projected traffic patterns and predicted population growth. The indicative corridor identifies a range of alternative routes, of which the final corridor will be selected from. The Draft Plan reflects the position in the overarching Transport Strategy and will protect the route from development when the route corridor has been finalised. However, pending a re-visit of the Feasibility Study to reflect its compliance with national and regional planning policy and the finalisation of the proposed route, it would be considered premature to protect this corridor for the Leinster Orbital Route in the absence of the selection of a final corridor for the project. In this regard the Chief Executive has proposed amendments to MOV POL 23 and MOV POL 34 as part of the response to TII (MH-C5-112).

Furthermore, it is considered that there is no requirement to identify a green heart at the centre of the county so as to avoid the development of such infrastructure. In the context of the Leinster Orbital Route it should be noted that this project will be subject to full Environmental Impact Assessment and Appropriate Assessment which will assess the likely environmental impacts of the development with which, a full assessment of impacts on Archaeological and Conservation Heritage will be carried out. This will also include an assessment of the project against the heritage objectives and policies outlined in the final County Development Plan. It is considered that this address the comments on this submission relating to CS OBJ 15, CS OBJ 16, ED POL 4, ED POL 6, ED OBJ 6, ED OBJ 53, MOV OBJ 57, HER POL 4, HER POL 6, HER POL 32, HER OBJ 32 and HER OBJ 33. Meath County Council acknowledge the support for these objectives generally and the matters relating to the Leinster Orbital Route are addressed above.

##### **CS OBJ 17**

CS OBJ 17 seeks to work closely with government departments to assist in the delivery of critical infrastructure. The detailed designed alignment of a rail line reflects that which is prepared and advanced by Iarnród Éireann and confirmed by the NTA. It is the responsibility of the Council to protect these lands from further development through the R1 Rail Corridor objective and specific zoning objective R1 Rail Corridor which seeks 'to provide for a strategic rail corridor and associated physical infrastructure'. The re-evaluation of the proposed route would be contrary to national and regional transport policy and is not within the remit of Meath County Council. It should be noted that the delivery of same will be subject of a Rail Order that will include Strategic Environmental Assessment and Appropriate Assessment and other normal planning considerations.

**SH POL 03** Green Heart Strategy protects archaeology but also gives clear access to cycling and walks for surrounding communities. This is welcomed and supported but sufficient safeguards are already considered and included within the Draft CDP respective Chapters.

**SH OBJ 11**

MCC note support for the transition of Ashbourne towards a Metropolitan Settlement by supporting its development as an enterprise and employment hub. The recommendations regarding future road infrastructure are also noted and it is considered that no change is required at this time.

**SH OBJ 12**

MCC intend to work closely with government departments to assist in the delivery of critical infrastructure. It should be noted that the delivery of same will be subject to Strategic Environmental Assessment and Appropriate Assessment and other normal planning considerations.

**SH POL 4**

The Draft CDP recognises the critical role tourism and related activity plays in the economic base of the County and to support the continued investment in this key indigenous industry.

**ED POL 8**

MCC note support for ED POL 8 which seeks to encourage and facilitate small indigenous industries at appropriate locations with good communication infrastructure, in recognition of their increasing importance in providing local employment.

**ED POL 18**

MCC note the support for ED POL 18 which seeks to support rural entrepreneurship and the development of micro businesses in rural areas. MCC note the suggestion to provide for tourist buses. Attention is also drawn to ED POL 23 which supports the development of activity based tourism facilities, in appropriate locations within the County subject to standard development management considerations.

**ED OBJ 22 and ED OBJ 23**

It is considered that the proposed changes to these objectives outlined in this submission have been addressed as part of the policies and objectives outlined in Chapter 2, Chapter 3 and Chapter 4.

**ED POL 39**

ED POL 39 can provide for such facilities as part of the implementation of the development plan, however, the development of the tranche 4 service stations is being undertaken by TII and Meath

County Council are not in a position to designate this location as a tourism hub for coaches to pick up and drop off at this time.

**ED POL 40, ED POL 44, ED POL 48, ED POL 56 and ED POL 57**

MCC welcome and note the support for these policies. The changes outlined as part of the subject submission would not be appropriate as these would not be in the power of MCC to enforce. In many cases the matters addressed above in relation to these policies would have to be addressed by private individuals or state bodies and as such the proposed changes would not appropriate.

**MOV OBJ 49**

MCC acknowledge support for MOV OBJ 49

**SOC OBJ 1**

MCC acknowledge support for SOC OBJ 1

**SOC POL 39**

Observation is addressed under SOC POL 38

**SOC OBJ 27**

The CDP contains a number of policies and objectives to support and encourage the development of tourism-led uses e.g. section 4.28 and rural enterprises (section 4.11.1)

**SOC OBJ 28**

Observation is noted.

**Section 8.5.1**

MCC notes the observation. The framework and principles for the protection for archaeological heritage are based on the presumption of avoiding development impacts on archaeological heritage with preservation in-situ being the first option.

**HER POL 2**

MCC acknowledge the key role that education plays with regard to understanding archaeological areas in Meath and the importance / safeguarding of same. See HER OBJ 5 & 6.

**HER POL 5**

It is considered that HER POL 2 protects all sites and features of archaeological interest discovered subsequent to the publication of the Record of Monument and Places, in situ (or at a minimum preservation by record) having regard to the advice and recommendations of the National Monuments Service of the Department of Culture, Heritage and the Gaeltacht.

**HER OBJ 3**

MCC agree with HER OBJ amendment to remove text 'To seek to' from the objective.

**HER POL 9**

The Meath CDP is the land use policy document for the County which includes Bru Na Boinne. There is scope for housing development other than connected to agriculture, HER POL 7; To encourage the retention, conservation, and appropriate re-use of traditional buildings within the UNESCO World Heritage Site of Brú na Bóinne in preference to either their replacement, or the construction of new buildings on green field sites.

**HER OBJ 9**

The Department of Culture, Heritage and the Gaeltacht are a statutory consultee for comment on all Brú na Bóinne planning applications. Meath County Council has regard in its decision-making capacity to all submissions including statutory consultees and submissions from the public.

**HER OBJ 11**

Observation noted.

**HER OBJ 12/13**

Observation noted.

**HER POL 42**

The trees identified in HER POL 42 are those which are located within settlements and which have zoning maps. The development of settlements may potentially threaten those trees and therefore they are protected to ensure their future existence. The trees on Tara do not have the same level of threat in terms of future development

**HER POL 46**

The Geological Survey of Ireland (GSI) through its Geoheritage Programme is responsible for the protection and promotion of sites of geological importance in Ireland. Under the Geoheritage Programme, expert panels were set up for each theme of the 16 geological themes (IGH 1 to IGH 16), resulting in an indicative list of sites national geological importance worthy of more detailed assessment within the relevant themes. The ongoing programme of County Audits (including County Meath) undertaken by the GSI working in partnership with Local Authorities and the Heritage Council was based on sites from these theme lists. Sites of national geological importance are designated as County Geological Sites (CGS) for inclusion in County Development Plans and the most significant County Geological Sites are recommended to the National Parks and Wildlife Service for potential future designation as Natural Heritage Areas.

**HER POL 54**

MCC note support for the draft Tara LCA.

**HER OBJ 51**

MCC note support for HER OBJ 51.

**HER OBJ 54**

MCC note the suggestion of using experienced tours to Tara. The objective seeks to work in partnership with the Department of Culture Heritage and the Gaeltacht, OPW, local community and all relevant stakeholders to address visitor management issues.

**HER OBJ 53**

The comments in relation to sustaining the open nature of Tara are noted.

**HER OBJ 55**

MCC note the observation in relation to view from St Patrick to the Hill of Slane, however, the M3 was developed in line with statutory planning processes. As such this matter was considered as part of a planning application that was approved and therefore, does not need to be specifically addressed as part of the development plan.

**RUR POL 42/RUR POL 44**

The majority of rural nodes comprise of existing clusters of development that have evolved over the years. They provide some social and community infrastructure. Rural nodes are designated

for limited development at a sustainable scale for immediate local need through the development of the clusters. It is anticipated that each rural node can cater for a small population increase from their current population base over the plan period and provide a sustainable alternative to one off housing.

### **11.10.3 Energy Networks and EV Charging Points.**

MCC note support for this objective. Further, MCC draw attention to MOV OBJ 24 which seeks to support facilities/infrastructure, through a roll-out of additional electric charging points in collaboration with relevant agencies

### **Chief Executive's Recommendation**

CS OBJ 15 No change required  
 CS OBJ 16 No change required  
 CS OBJ 17 No change required  
 SH POL 3 No change required  
 SH OBJ 11 No change required  
 SH OBJ 12 No change required  
 SH POL 4 No change required  
 ED POL 4 No change required  
 ED POL 6 No change required  
 ED POL 8 No change required  
 ED OBJ 6 No change required  
 ED OBJ 22 No change required  
 ED OBJ 23 No change required  
 ED POL 18 No change required  
 ED POL 39 No change required  
 ED POL 40 No change required  
 ED POL 44 No change required  
 ED POL 48 No change required  
 ED POL 56 No change required  
 ED OBJ 73 No change required  
 ED POL 57 No change required  
 MOV OBJ 49 No change required  
 MOV OBJ 57 No change required  
 SOC OBJ 1 No change required  
 SOC POL 39 No change required  
 SOC OBJ 27 No change required  
 SOC OBJ 28 No change required  
 Section 8.5.1 – No change required  
 HER POL 2 No change required  
 HER POL 4 No change required  
 HER POL 5 No change required  
 HER OBJ 3 change recommended Vol 1, Chapter 8, Section 8.6, HER OBJ 3:

HER OBJ 3

~~To seek to~~ **To** protect important archaeological landscapes from inappropriate development.

HER POL 6 No change required  
 HER POL 9 No change required

HER OBJ 9 No change required  
 HER OBJ 11 No change required  
 HER OBJ 12/13 No change required  
 HER POL 32 No change required  
 HER OBJ 32 No change required  
 HER OBJ 33 No change required  
 HER POL 42 No change required  
 HER POL 46 No change required  
 HER POL 54 No change required  
 HER OBJ 51 No change required  
 HER OBJ 53 No change required  
 HER OBJ 54 No change required  
 HER OBJ 55 No change required  
 RUR POL 42/RUR POL 44 No change required  
 Section 11.10.3 No change required

<b>Submission No.:</b>	MH-C5-622
<b>Submitted by:</b>	Sinéad Burke
<b>Submission Theme(s):</b>	Chapter 8 Cultural and Natural Heritage Strategy
<b>Summary of Submission:</b>	
<p>This submission outlines that, recently in East Meath, alongside housing development there has been the removal of significant hedgerows. In this regard the submission seeks the following:</p> <ul style="list-style-type: none"> <li>• hedgerow removal be restricted to only the area of hedgerow at the entrance to a development</li> <li>• All remaining hedgerows be granted an area at least 25m wide to allow natural development of the hedgerow into a larger space, thus sequestering more carbon and allowing for the protection of our rapidly-declining wild bird and pollinator populations</li> <li>• These measures be enforced</li> <li>• These measures be marketed to other county councils as a proactive way to protect our vulnerable natural resources</li> <li>• Paths and cycle ways may be installed on the development-side of the hedges, as required, as this allows for safe road use</li> <li>• This be applied to the entire county</li> </ul>	
<b>Chief Executive's Response</b>	
<p>Hedgerows are an important ecological feature in the landscape and form part of the historical and archaeological heritage of the county. They also serve a number of very important environmental and biodiversity functions and form part of our Green Infrastructure network. The Draft Plan contains a number of policies and objectives to support the sustainable management of Meath's hedgerow resource (HER POL 37, HER POL 38, HER POL 39, HER OBJ 58, RUR POL 35 refers). While there is merit in proposing that sufficient space is retained hedgerows imposing a buffer zone of 25m in urban areas it may limit the achievement of desired density. In addition, it is a requirement that a detailed design statement shall accompany all planning applications for residential development on sites in excess of 0.2ha and for more than 10 residential units – which shall include an open space/landscaping strategy which identifies any areas of ecological interest and sets out proposals for same and can also incorporate path and cycle routes.</p>	

**Chief Executive's Recommendation**

No change recommended.

**Submission No.:**

MH-C5-710

**Submitted by:**

Cllr. Aisling Dempsey

**Submission Theme(s):**

Chapter 8 Cultural and Natural Heritage Strategy

**Summary of Submission:**

This submission relates to the provision of a County Museum and seeks the following:

- (1) I call on Meath Co Co to ensure that the feasibility study called for under the Meath Heritage Plan 2015 - 2020 is undertaken as soon as possible so that we can push ahead with the development of a County Museum in this heritage rich county. With the castle and many other amenities, Trim is an obvious choice for location which will boost tourism.

**Chief Executive's Response**

Funding for County Heritage Plan Projects is sought by Local Authorities on an annual basis each January from the Heritage Council through their *County Heritage Plan Grant Scheme*. In preparing its application for 2021 Meath County Council will prioritise the scoping of the feasibility study.

**Chief Executive's Recommendation**

No change required.

**Submission No.:**

MH-C5-745

**Submitted by:**

Boyne Valley Consultative Committee (BVCC)

**Submission Theme(s):**

Chapter 8 Cultural and Natural Heritage Strategy

**Summary of Submission:**

This submission on Behalf of the Boyne Valley Consultative Committee

The Boyne Valley Consultative Committee represents the interests of the communities within and proximate to the WHS at Brú na Bóinne.

The local community, many of whom have actively participated in the conservation, preservation and promotion of the Bru na Bóinne WHS, is a stakeholder in its management and future. The new County Development plan must acknowledge the local community's right to sustainable socio-economic growth and development. To this end, while recognising the protection of the OUV, the new Plan must provide for reasonable development of residences, businesses and social amenities. The local community should not be subject to disadvantage or discrimination, instead they should be encouraged to continue to sustain, maintain and grow the area.

The new Development Plan must completely discard the provisions of the existing County Development Plan that apply specifically to the environs of the WHS and start afresh with a new



approach which will enable the communities within the WHS Core and Buffer Zones and those proximate to it (in sight lines etc ) to engage in sustainable development so that living communities can be both maintained, nurtured and facilitated.

The BVCC are aware that the Department of Arts, Heritage Regional, Rural and Gaeltacht Affairs commissioned a Multi-Criteria Analysis of the issues arising from the chronic mismanagement of the area around the WHS by the State parties. The BVCC engaged in a constructive and positive manner with this analysis and expects the Meath County Development Plan to reflect its recommendations and reasoning and to formulate policies and objectives which may be implemented during the life of the Plan

The New MCDP must achieve the following aims:-

- Fostering of sustainable economic development, particularly in tourism and agriculture enterprises and identification of development opportunities
- Mitigation of barriers to socio-economic development of the local community
- Promoting the principle that members of the local community should not be socially, culturally or economically disadvantaged by the planning regime adopted by the local authorities and other state parties because of proximity to the WHS
- The fostering of improved relationships with the local community through open and clear communication and dialogue
- Work with authorities and online agencies to address risks and inherent in signage issues. It is still normal for those outside the area following signposts to travel to Donore instead of Newgrange resulting in a long diversion and a significant waste of time on their part. The community has not forgotten the incidents in which emergency services travelled to Donore instead of Newgrange.
- Demolition and re-development of the dilapidated public toilets / information office at Newgrange to provide both toilet and shelter facilities for visitors in a building reflecting the very best of present day architecture as appropriate to a modern nation. Appropriate redevelopment of this site, as with others in the area, can only enhance the visitor experience and improve the OUV.
- Provision of rain / weather cover on all sites
- Provision of safe parking and pick-up at all sites
- Provision of a Park and Ride from e.g. Slane and Donore villages which would provide for inclusion of a greater tourist experience and include local tourist and agri-tourism enterprises.
- Identification of a single decision-making authority in the planning and development process for the area
- Provision of clear, uniform planning and development guidelines and criteria by the relevant local and state authorities
- Pre-planning meetings should be attended by representatives of all stakeholders and decision-makers, in which all reasonably foreseeable issues pertaining to the proposed development are defined. Adherence to Pre-planning decisions made is imperative

The BVCC expects the new MCDP to reflect fully the points raised in this submission. The current management framework and approach adopted by MCC and the DAHRRGA for the Brú na Bóinne

site and hinterland has long since lost the confidence of the communities that are impacted by it.

With regard to the particulars of the draft plan we note the following:

## POLICIES

### HER POL 6

*To protect the Outstanding Universal Value of the UNESCO World Heritage Site of Brú na Bóinne in accordance with the relevant guidelines and national legislation, so that its integrity, authenticity and significance are not adversely affected by cumulative inappropriate change and development.*

We acknowledge that Bru na Boinne and its environs are a unique and wonderful place and so we support this policy. However we again reiterate that we, as a living community must not be placed at a disadvantage socially or economically as a consequence of actions taken by Meath County Council pursuant to this policy.

### HER POL 7

To encourage the retention, conservation, and appropriate re-use of traditional buildings within the UNESCO World Heritage Site of Brú na Bóinne in preference to either their replacement, or the construction of new buildings on green field sites.

We support the commitment to encourage the reuse and repurposing of existing buildings as a means to enable the community to grow and to pursue its right to economic and social development. Coupled with the dispensing of the 50% foot print limit, this should enable this policy to be effective in operation as people re-use the existing stock of buildings to provide homes etc.

### HER POL 9

*To consider individual housing within the UNESCO World Heritage Site of Brú na Bóinne, as shown on Map 8.1 - UNESCO World Heritage Site - Brú na Bóinne, only for those involved locally in full time agriculture and who do not own land outside of the UNESCO World Heritage Site of Brú na Bóinne and subject to compliance with all other relevant provisions contained in this Development Plan.*

We note that the restriction contained within HER OBJ 9 to limit any individual housing development to those engaged in full time agriculture only will lead to further depletion of our community and its welfare. There are few if any new jobs being created in agriculture – continued consolidation of farms into large landholdings is the norm and with that the opportunity for agricultural based employment diminished greatly. Any future business plan must include new avenues to employment for the community – these are unlikely to meet the criteria set out in HER OBJ 9 and so the Development Plan commits to doing something to mitigate the disadvantages visited upon our community and then promptly rules out the implementation of a vast swathe of possible business development opportunities by inserting this unnecessary restriction. The BVCC respectfully but firmly requests that this is amended to allow other legitimate and long term employments or other grounds (such as family reasons etc) as qualification for the possibility of a new development. The BVCC would also contend that the implementation of HER OBJ9 will drastically change the culture and make-up of communities and community life in Ireland if implemented. Traditional organisations like the GAA, that hold communities together and provide such important values and amenities will not survive nor function on large farmers sons alone. A community is not defined solely by Agriculture, so it will be the end of communities as we know them.

#### HER POL 10

*To ensure that residential extensions within the UNESCO World Heritage Site of Brú na Bóinne are in character with the original building.*

This appears, on the face of it, to be a reasonable policy. However it is subjective and interpretation is entirely dependent on the personal aesthetic preferences of the Planning Officer who is charged with making a decision. It also appears to rule out any possibility of architectural design which is fresh and takes a different approach to the possibilities. We note that there are very many architectural styles manifest within the WHS and further note that this is a living environment which cannot be restricted in such matters if the communities entitlement to growth and development is to be accepted and delivered.

#### HER POL 11

*To support the Department of Culture, Heritage and the Gaeltacht and all stakeholders in the implementation of the Brú na Bóinne Management Plan, 2017*

While it is clear that such a policy may be required, the BVCC, on behalf of the community, reserves the right to challenge decisions that may be taken under the terms of the Management Plan which fail to respect the rights of the community to growth and development economically and socially. The BVCC also notes that one of the recommendations of the Multi Criteria Analysis commissioned by the DAHG was the involvement of the community in the Management of the World Heritage Site at the highest level. This is absolutely paramount as the major stakeholder in the area are the residents and there is a huge benefit to all, if residents are involved and buy into a plan, rather than being dictated to.

#### OBJECTIVES

##### HER OBJ 7

*To work in partnership with the community and all other relevant stakeholders to promote, understand, conserve and sustainably manage the UNESCO World Heritage Site of Brú na Bóinne.*

This is a shared goal and one which the BVCC supports unreservedly as it sees sustainability as applying to the community resident in the WHS and its environs as equally important to any other element that requires sustainability. We also note that UNESCO management guidelines require the sustainability of the living community in and around WHS sites to be respected, promoted and nurtured.

##### HER OBJ 8

*To encourage and facilitate pre-application discussions, in conjunction with the Department of Culture, Heritage and the Gaeltacht, regarding the siting and design of developments affecting the UNESCO World Heritage Site of Brú na Bóinne and the scope of any necessary impact assessments.*

This is another objective which we support. Indeed we would go further and ask for written guidelines to be produced for the benefit of prospective applicants so that it is clear how their application will be managed before they commit to the expense of the application itself.

##### HER OBJ 9

*To refer all planning applications within the UNESCO World Heritage Site of Brú na Bóinne to the Department of Culture, Heritage and the Gaeltacht for comment. These comments will be*

*considered in the assessment of all such planning applications.*

We understand that this is a statutory requirement. We note however that this should not automatically mean that an objection from the Department on any ground whatsoever constitutes a veto on the proposed development. It is our position that the planning process conducted by the County Council must make proper provision for the legitimate requirement of the community and its individual members to enhance their economic and social wellbeing regardless of the views of the Department.

#### HER OBJ 10

*To actively support and encourage the re-use of vacant and derelict dwellings within the Core and Buffer Zone of the World Heritage Site of Brú na Bóinne by providing assistance and professional advice to owners seeking to re-develop such sites.*

This is another objective which has our support. In this regard we believe that a positive approach based on a constructive, problem solving basis is essential to ensure that development is permitted so that families can nurture each other now and in the future. We support the commitment to encourage the reuse and repurposing of existing buildings as a means to enable the community to grow and to pursue its right to economic and social development. Coupled with the dispensing of the 50% foot print limit, this should enable this policy to be effective in operation as people re-use the existing stock of buildings to provide homes etc.

#### HER OBJ 11

*To protect the ridgelines which frame views within and from the UNESCO World Heritage Site of Brú na Bóinne from inappropriate or visually intrusive development.*

We acknowledge that these ridgelines are an important element of the entire site but note that there may be some requirement for latitude in the application of this objective depending on particular development needs by various members of the community. We would also contend that the needs to be more definition around the ridgeline criteria as many applicants would be of the view that it is used selectively with no real set criteria for ridgelines when looking at recently approved and refused applications. There is also a view within our community that due to the expense of pursuing an application within the World Heritage Site and its peripheries, that there should be some support funding provided for visual impact assessments and other related requests from local and state authorities to ensure developments are suitable for the World Heritage Site environs.

#### HER OBJ 12

*To prepare and implement a Business Plan for the World Heritage Site in conjunction with relevant stakeholders, subject to funding.*

We see the drafting and implementation of a suitable business plan as envisaged by HER OBJ 12 as key to the growth and development of our community in both social and economic terms. Such a blueprint should assist us in enhancing the economic benefits that should flow from our proximity to the WHS. It should also assist us in achieving our stated aim of mitigation of the disadvantages that have been imposed on the community in and around Brú na Bóinne over the last 20 years or more. Clearly it is our understanding that we, the community will have a significant influence in the formation of the plan which must meet the needs of the community whilst recognising that those who may be disadvantaged by any initiatives also deserve consideration.

OTHER

#### 9.5.4 Rural Nodes

We support the designation of a rural node for housing development in Monknewtown in the Laytown-Bettystown MD.

### Chief Executive's Response

#### HER POL 6

*To protect the Outstanding Universal Value of the UNESCO World Heritage Site of Brú na Bóinne in accordance with the relevant guidelines and national legislation, so that its integrity, authenticity and significance are not adversely affected by cumulative inappropriate change and development.*

The living community of Brú na Bóinne will not be treated or be placed at a disadvantage socially or economically with regards planning as a consequence of actions taken by Meath County Council pursuant to this policy.

Meath County Council will at all times strive to balance the appropriate proper planning and sustainable development of the area with regard to the World Heritage Site and the needs of the local community.

#### HER POL 7

Meath County Council acknowledges and notes the submission on HER POL 7

#### HER POL 9

*To consider individual housing within the UNESCO World Heritage Site of Brú na Bóinne, as shown on Map 8.1 - UNESCO World Heritage Site - Brú na Bóinne, only for those involved locally in full time agriculture and who do not own land outside of the UNESCO World Heritage Site of Brú na Bóinne and subject to compliance with all other relevant provisions contained in this Development Plan.*

The primary policies and objectives for the UNESCO World Heritage Site of Brú na Bóinne relate to the preservation of its Outstanding Universal Value. Meath County Council acknowledges the concerns with regard to this policy (HER POL 9) in limiting one off housing development solely to those involved locally in full time agriculture. There is however scope for housing development other than connected to agriculture, HER POL 7; *'To encourage the retention, conservation, and appropriate re-use of traditional buildings within the UNESCO World Heritage Site of Brú na Bóinne in preference to either their replacement, or the construction of new buildings on green field sites.'* The plan has an objective *'To actively support and encourage the re-use of vacant and derelict dwellings within the Core and Buffer Zone of the World Heritage Site of Bru na Bóinne by providing assistance and professional advice to owners seeking to re-develop such sites (HER OBJ 10).'* In addition, Meath County Council has revised its policy in relation to residential extensions by removing limits on the percentage of existing floor area increase – (See HER POL 10).

#### HER POL 10

*To ensure that residential extensions within the UNESCO World Heritage Site of Brú na Bóinne are in character with the original building.*

New contemporary extensions will be considered provided the scale and design contribute

positively to the character of the original building. The submission warrants a revision of the wording of HER POL 10.

#### HER POL 11

Meath County Council acknowledges and notes the submission on HER POL 11

#### HER OBJ 7

Meath County Council acknowledges and notes the submission on HER OBJ 7

#### HER OBJ 8

Meath County Council acknowledges and notes the submission on HER OBJ 8, Meath County Council endeavors to provide as much information as possible within any pre-application discussion.

#### HER OBJ 9

The Department of Culture, Heritage and the Gaeltacht are a statutory consultee for comment on all Bru na Boinne planning applications. Meath County Council has regard in its decision-making capacity to all submissions including statutory consultees and submissions from the public.

#### HER OBJ 10

Meath County Council acknowledges support for HER OBJ 10

#### HER OBJ 11

Planning applications for development needs by various members of the community are considered on a case by case basis, where all criteria are assessed as part of the overall planning application.

#### HER OBJ 12

Meath County Council acknowledges and notes the submission on HER POL 12, the Business Plan will be created with all relevant stakeholders.

Support for the designation of a rural node for housing development in Monknewtown in the Laytown-Bettystown MD is noted.

### **Chief Executive's Recommendation**

#### *HER POL 6*

No change required.

#### *HER POL 7*

No change required.

#### *HER POL 9*

No change required.

HER POL 10 should be revised to:

*To ensure that residential extensions within the UNESCO World Heritage Site of Brú na Bóinne ~~are in character with the original building.~~ **respect the scale, design and character of the original building.***

HER POL 11

No change required.

HER OBJ 7

No change required.

HER OBJ 8

No change required.

HER OBJ 9

No change required.

HER OBJ 10

No change required.

HER OBJ 11

No change required.

HER OBJ 12

No change required.

Rural node for housing development in Monknewtown in the Laytown-Bettystown MD is noted –  
No change required.

<b>Submission No.:</b>	MH-C5-763
<b>Submitted by:</b>	Gareth Kyne on behalf of Boyne Valley Consultative Committee
<b>Submission Theme(s):</b>	Chapter 8 – Cultural and Natural Heritage Strategy3
<b>Summary of Submission:</b>	
<p>This submission states that the author is supportive of all the provisions of the proposed Meath County Development Plan which foster the economic and social development of all the community who live in, and around, the WHS at Brú na Bóinne.</p> <p>1. It is stated that it is vital that the unwarranted restrictions that were heretofore placed on this community by an oppressive and ill-considered management regime become a thing of the past and that every effort is made going forward to enable our community to capture the full benefits and opportunities that our location in and around the WHS may offer.</p>	



A case is made for all the families who have a reasonable and legitimate expectation that one generation would be enabled to live in close proximity to their parents, thereby ensuring that those older members of our community are not forced out of their homes and away from their neighbours and friends. Their own children should not be denied the possibility of converting a barn or shed into a family home so that they can ensure a comfortable and secure old age for their parents.

Restrictions on employment for which development opportunities may be granted which unduly limit livelihoods to those derived from full-time agriculture will kill our community as it will deprive us of availing from opportunities in tourism and other service provision on which our community should be able to depend for the future. This restriction, as detailed in:

HER POL 9

To consider individual housing within the UNESCO World Heritage Site of Brú na Bóinne, as shown on Map 8.1 - UNESCO World Heritage Site - Brú na Bóinne, only for those involved locally in full time agriculture and who do not own land outside of the UNESCO World Heritage Site of Brú na Bóinne and subject to compliance with all other relevant provisions contained in this Development Plan.

is unacceptable and requires review to include tourism and hospitality grounds if the community in and around Brú Na Bóinne is to be afforded its entitlement for economic and social development.

2. The provisions contained within

HER POL 7

To encourage the retention, conservation, and appropriate re-use of traditional buildings within the UNESCO World Heritage Site of Brú na Bóinne in preference to either their replacement, or the construction of new buildings on green field sites.

and

HER OBJ 10

To actively support and encourage the re-use of vacant and derelict dwellings within the Core and Buffer Zone of the World Heritage Site of Brú na Bóinne by providing assistance and professional advice to owners seeking to re-develop such sites.

This should include clear and overt references to multi-generational living so that, as is becoming increasingly common, existing homes and out-buildings may be re-configured to accommodate different generations of the same family without undue expense or excessive delays. Such an initiative would meet several social needs and be welcome to all.

3. As a general comment I would offer the following list which should be a reference point for all decisions concerning the WHS:

- Provision of clear, uniform planning and development guidelines and criteria by the relevant local and state authorities
- Pre-planning meetings should be attended by representatives of all stakeholders and decision-makers, in which all reasonably foreseeable issues pertaining to the proposed development are defined. Adherence to Pre-planning decisions made is imperative
- Adoption of a Business Plan for the Core and Buffer Zones which will lend further clarity to sustainable socio-economic development

- Fostering of sustainable economic development, particularly in tourism and agriculture enterprises and identification of development opportunities
- Mitigation of barriers to socio-economic development of the local community
- Promoting the principle that members of the local community should not be socially, culturally or economically disadvantaged by the planning regime adopted by the local authorities
- Inclusion of local representatives in any Plan review processes, fostering improved relationships with the local community through open and clear communication and dialogue
- Work with authorities and online agencies to address issues and risks inherent in signage issues
- Provision of a Park and Ride from e.g. Slane and Donore villages which would provide for inclusion of a greater tourist experience and include local tourist and agri-tourism and hospitality enterprises.

4. The author in a personal capacity supports all the points made in the submission on behalf of the Brú na Bóinne Community made by the Boyne Valley Consultative Committee.

#### **Chief Executive's Response**

##### **1. HER POL 9**

*To consider individual housing within the UNESCO World Heritage Site of Brú na Bóinne, as shown on Map 8.1 - UNESCO World Heritage Site - Brú na Bóinne, only for those involved locally in full time agriculture and who do not own land outside of the UNESCO World Heritage Site of Brú na Bóinne and subject to compliance with all other relevant provisions contained in this Development Plan.*

The primary policies and objectives for the UNESCO World Heritage Site of Brú na Bóinne relate to the preservation of its Outstanding Universal Value. Meath County Council acknowledges your concerns with regard to this policy (HER POL 9) in limiting one off housing development solely to those involved locally in full time agriculture. There is however scope for housing development other than connected to agriculture, HER POL 7; *'To encourage the retention, conservation, and appropriate re-use of traditional buildings within the UNESCO World Heritage Site of Brú na Bóinne in preference to either their replacement, or the construction of new buildings on green field sites.'* The plan has an objective *'To actively support and encourage the re-use of vacant and derelict dwellings within the Core and Buffer Zone of the World Heritage Site of Bru na Bóinne by providing assistance and professional advice to owners seeking to re-develop such sites (HER OBJ 10)'*. In addition, Meath County Council has revised its policy in relation to residential extensions by removing limits on the percentage of existing floor area increase – (See HER POL 10).

2. In relation to HER POL 7 and HER OBJ 10 – the policy and objective as written does not exclude proposals that may accommodate multi-generational living. Meath County Council welcomes and actively supports the appropriate re-use of vacant and derelict dwelling and/or traditional buildings.

3. Meath County Council notes the reference points offered in relation to decisions concerning the WHS. Meath County Council has always sought to strike a balance between the needs of the local community with our responsibility and obligation to protect the Outstanding Universal Value of the World Heritage Site. The Draft County Development Plan provides detailed policies, objectives, and development assessment criteria and it is considered that these, together with the Brú na Bóinne Management Plan, provide a framework for the management of the area e.g. In respect of Brú na Bóinne in the draft plan the council has proposed a revision to the existing

policy in relation to extensions and alterations (HER POL 10); designated a rural node in Monknewtown; committed to actively supporting and encouraging to reuse of vacant dwelling by providing assistance and professional advice to owners seeking to re-develop such sites (HER OBJ 10); committed to preparing and implementing a Business Plan for the WHS in conjunction with relevant stakeholders subject to funding (HER OBJ 12); committed to encouraging and facilitating pre-application discussions in conjunction with the Department of Culture, Heritage and the Gaeltacht, regarding the siting and design of developments affecting the WHS (HER OBJ 8) in addition to working in partnership with the community and all other relevant stakeholders to promote, understand, conserve and sustainably manage the WHS.

4. Support for the Boyne Valley Consultative Committee submission is acknowledged and the response to this submission is in MH-C5-745.

#### **Chief Executive's Recommendation**

1. No change required.
2. No change required.
3. No change required.
4. No change required.

<b>Submission No.:</b>	MH-C5-757
<b>Submitted by:</b>	Nicholas Wilkinson
<b>Submission Theme(s):</b>	Volume 4 - AA and SEA
<b>Summary of Submission:</b>	
<p>It is submitted that St. Gorman's Well has been designated a County Geological Site and pNHA by Meath County Council and the Geological Survey of Ireland. It is stated that the SEA report identifies and lists the County Geological Sites (Table 5.3) but the Natura Impact Report (NIR) does not identify this site as a proposed NHA on its mapping on Figure 3. It is submitted that this should be amended as a matter of urgency to ensure the site is given the protection due to it under its status and listing in the plan. Relevant extracts from SEA report and NIR map included with submission.</p>	
<b>Chief Executive's Response</b>	
<p>The audit of County Geological Sites in Co Meath was completed in 2007 and revised in 2009. The audit was carried out by the Geological Survey of Ireland supported by the Heritage Council and Meath County Council as an action of the <i>County Meath Heritage Plan 2007-2011</i>. 28. The audit identified 28 sites of county geological importance and are covered by protection policy under the Draft Plan.</p> <p>All sites of geological heritage importance are currently classified as County Geological Sites (CGSs) until such time that the most significant sites can be designated as geological NHAs. Until the National Parks and Wildlife Service act upon GSI's recommendations and undertake due legal process in advertising and consulting with landowners on their intention to designate, there is no national legislative basis to the 'sites' (excepting those which happen to be within existing designated National Park, Natural Heritage Area or Special Areas of Conservation (SAC). The CGSs are therefore not yet proposed NHA (pNHAs) and therefore for that reason they were not included in the mapping on Figure 3 in the NIR.</p> <p>The Planning and Development Act 2000 and the Planning Regulations, in particular, place responsibility upon Local Authorities to ensure that geological heritage is protected. The</p>	

presence of County Geological Sites will be considered when planning any type of development as they are of national scientific and heritage importance.

The Draft Plan have listed and mapped all CGS in Meath and included HER POL 46 *To maintain the geological and geomorphological heritage values of County Geological Sites listed in Table 8.5 and, through consultation with the Geological Survey of Ireland, protect them from inappropriate development.*

Consultation with the GSI will provide an opportunity to propose mitigation measures and/or alternative, should geological heritage be likely to be impacted by any proposed project. It is noteworthy that the Irish Concrete Federation and the Geological Survey of Ireland have developed a set of guidelines for the quarrying industry entitled '*Geological Heritage Guidelines for the Extractive Industry*'.

The Draft Natura Impact Report of the Draft County Meath Development 2020-2026 as part of the appropriate assessment analysis of Any adverse effects on European site integrity as a result of implementing the Policy/Objective in relation to HER POL 46 concluded:

*No. Absence of cause-effect linkage between implications of objective and the integrity of European sites. Some of these areas likely overlap with European sites, however this is a protective policy.*

#### **Chief Executive's Recommendation**

No change required.

<b>Submission No.:</b>	MH-C5-788
<b>Submitted by:</b>	Enfield Environment Group
<b>Submission Theme(s):</b>	Volume 4 - AA and SEA
<b>Summary of Submission:</b>	
<p>St. Gorman's Well be included in the Appropriate Assessment as a designated Geological Site and pNHA list in order that it receive protection due to the site, which is of national importance and likely to be more so given the future need for renewable energy in the future, we should not compromise the future wellbeing of our population, for the short term aggregate use by this generation.</p> <p>It is stated that the SEA report identifies and lists the County Geological Sites (Table 5.3) but the Natura Impact Report (NIR) does not identify this site as a proposed NHA on its mapping on Figure 3. Relevant extracts from SEA report and NIR map included with submission.</p>	
<b>Chief Executive's Response</b>	
<p>The audit of County Geological Sites in Co Meath was completed in 2007 and revised in 2009. The audit was carried out by the Geological Survey of Ireland supported by the Heritage Council and Meath County Council as an action of the <i>County Meath Heritage Plan 2007-2011</i>. 28. The audit identified 28 sites of county geological importance and are covered by protection policy under the Draft Plan.</p> <p>All sites of geological heritage importance are currently classified as County Geological Sites (CGSs) until such time that the most significant sites can be designated as geological NHAs. Until the National Parks and Wildlife Service act upon GSI's recommendations and undertake due legal</p>	

process in advertising and consulting with landowners on their intention to designate, there is no national legislative basis to the 'sites' (excepting those which happen to be within existing designated National Park, Natural Heritage Area or Special Areas of Conservation (SAC). The CGSs are therefore not yet proposed NHA (pNHAs) and therefore for that reason they were not included in the mapping on Figure 3 in the NIR.

The Planning and Development Act 2000 and the Planning Regulations, in particular, place responsibility upon Local Authorities to ensure that geological heritage is protected. The presence of County Geological Sites will be considered when planning any type of development as they are of national scientific and heritage importance.

The Draft Plan have listed and mapped all CGS in Meath and included HER POL 46 *To maintain the geological and geomorphological heritage values of County Geological Sites listed in Table 8.5 and, through consultation with the Geological Survey of Ireland, protect them from inappropriate development.*

Consultation with the GSI will provide an opportunity to propose mitigation measures and/or alternative, should geological heritage be likely to be impacted by any proposed project. It is noteworthy that the Irish Concrete Federation and the Geological Survey of Ireland have developed a set of guidelines for the quarrying industry entitled '*Geological Heritage Guidelines for the Extractive Industry*'.

The Draft Natura Impact Report of the Draft County Meath Development 2020-2026 as part of the appropriate assessment analysis of Any adverse effects on European site integrity as a result of implementing the Policy/Objective in relation to HER POL 46 concluded:

*No. Absence of cause-effect linkage between implications of objective and the integrity of European sites. Some of these areas likely overlap with European sites, however this is a protective policy.*

#### **Chief Executive's Recommendation**

No change required.

<b>Submission No.:</b>	MH-C5-941
<b>Submitted by:</b>	Colin & Áine Campbell
<b>Submission Theme(s):</b>	Chapter 8 Cultural and Natural Heritage Strategy
<b>Summary of Submission:</b>	
Record of Protected Structures – Proposed Addition 91564 Belper House, Belper, Tara, Ratoath. Owner objects to the proposals saying it is unnecessary at this stage. Stating that considerable works have been carried out over the last few years.	
<b>Chief Executive's Response</b>	
The architectural qualities of this building are immediately apparent in the scale and form of this house. Although extended, and with internal alterations, it largely retains its original character	

and should be added to the Record of Protected Structures.

**Chief Executive's Recommendation**

No change required.

<b>Submission No.:</b>	MH-C5-969
<b>Submitted by:</b>	Cllr Wayne Harding
<b>Submission Theme(s):</b>	Chapter 8 Cultural and Natural Heritage Strategy; Chapter 10 Climate Change Strategy
<b>Summary of Submission:</b>	
<p>1.The Draft Development Plan 2020-2026 contains important objectives for essential infrastructure including road infrastructure to be developed and constructed over the life of the plan. It also contains important policies and objectives outlining the Council's approach to climate change adaptation, greenhouse gas mitigation and the protection of the natural and cultural heritage of the county. In order to clarify how all the policies and objectives can co-exist within the plan, consideration should be given to including an order of priority to avoid the situation where policies and objectives in different chapters inadvertently contradict one another i.e. that specific objectives take priority over general.</p> <p>2.It is suggested that wording and specific objectives contained in Chapters 8, 10, and elsewhere in the Development Plan should include wording to clarify that these can accommodate the provision of essential infrastructure (subject to any legal obligations under European and Irish law to protect European Sites and any obligations in relation to the World Heritage Site). In section 8.2 page 263 under the heading 'Vision', I note that the Plan states that it 'seeks to achieve a balance between the foregoing and economic prosperity and social integration.' I submit that the words 'delivery of essential public infrastructure,' be added before the word 'economic' in the above statement.</p> <p>The following objectives and policies Her OBJ 3, HER POL 6, HER OBJ 11, HER POL 16, HER POL25, HER OBJ 27, HER POL27, HER OBJ 33, HER POL39, HER POL47, HER POL 51, HER POL 52, HER OBJ 48 and HER OBJ 55, should have additional wording added to make it clear that essential public infrastructure can be accommodated once feasible mitigation or compensatory measures (where appropriate) are to be implemented.</p> <p>3. MOV OBJ 33, 36, 43, 47 and 49 contain wording in relation to Appropriate Assessment which is more onerous than the Habitats Directive and the corresponding Irish transposing legislation. MOV POL 33 also contains similar wording. Such text should be amended so that it is consistent with the Habitats Directive and the national law governing same and should keep open the option of availing of IROPI (Imperative Reasons of Overriding PublicInterest).</p> <p>It is submitted that the following extract from Cork City Council's Development Plan contains the following wording in line with the Habitats Directive:</p> <p>10.37 Under the current legislation any plan/project and any associated works, individually or in</p>	

combination with other plans or projects are subject to Appropriate Assessment Screening to ensure there are no likely significant effects on the integrity (defined by the structure and function) of any Natural 2000 site (s) and that the requirements of Article 6 (3) and 6(4) of the EU Habitats Directive are fully satisfied. When a plan/project is likely to have a significant effect on a Natura 2000 site or there is uncertainty with regard to effects, it shall be subject to Appropriate Assessment. The plan/project will proceed only after it has been ascertained that it will not adversely affect the integrity of the site or where, in the absence of alternative solutions, the plan/project is deemed imperative for reasons of overriding public interest, all in accordance with the provisions of Article 6(3) and 6(4) of the EU Habitats Directive (Chapter 16 Development Management, paragraph 16.127).

### Chief Executive's Response

1. *Development Plans: Guidelines for Planning Authorities (2007)* state that 'Development plans play a central role in the identification and protection of the natural and built environment. The development plan will set out policies for the protection of the environment and heritage and is an important source of information for landowners, developers, communities and members of the public in this regard. Development plan policies affecting protected sites should be clearly compatible with their long-term protection and sustainable use'. No legislative provision exists for including an 'order of priority' for policies and objectives within the CDP as suggested. Each individual development proposal is assessed on a case-by-case basis and must be consistent with proper planning and sustainable development. In July 2019 Meath County Council declared a Climate and Biodiversity Emergency and produced *Climate Action Strategy* which highlighted 'that urgent actions must be taken to ensure a healthy environment for all our citizens'. Chapter 10 Climate Change strategy outlines the approach to climate change adaptation and greenhouse gas mitigation, as required by the Planning and Development Act 2000 (as amended) within Section 10 (2) (n) which includes requirements to - (n) the promotion of sustainable settlement and transportation strategies in urban and rural areas including the promotion of measures to—

- a. (i) reduce energy demand in response to the likelihood of increases in energy and other costs due to long-term decline in non-renewable resources,
- (ii) reduce anthropogenic greenhouse gas emissions, and
- (iii) address the necessity of adaptation to climate change;

in particular, having regard to location, layout and design of new development.

To conclude, the Chief Executive is of the view that an appropriate balance has been provided between all chapters in the Draft CDP and that the policies and objectives within each respective chapter can co-exist and yet achieve their main aim and purpose without conflict arising between them. The Draft CDP (and any subsequent amendments following consideration of submissions) have gone through a rigorous SEA and AA process and any proposed development being facilitated through the CDP will go through all necessary environmental assessments at development management stage.

2. We note your observation regarding essential infrastructure and recognise the need for such infrastructure for the development of County Meath. However, the agreed vision as presented, provides a balance of the sensitive integration of sustainable development of the County for the benefit of present and future generations. The Plan seeks to achieve this balance between the foregoing, economic prosperity and social integration. The reference to 'Essential Infrastructure' is subjective and is not defined in any National, Regional or local documents. In reality, all infrastructure developments could be considered essential as they are needed to meet an identified need or to facilitate/enable other development. It is also important to note that Table 5.1 of the Draft CDP already outlines the Critical Infrastructure



projects as required in the Movement Chapter to facilitate the sustainable development of County Meath over the plan period. Under relevant Directives and legislation, all proposals that are considered development require planning permission and must undergo necessary environmental assessments that reflect all statutory compliances in relation to the proper planning and sustainable development of County Meath (e.g. in respect of design, location, and the protection of important landscapes and any environmentally sensitive areas etc. etc.)

The Planning and Development Act 2000 (as amended) and Section 28 Guidelines on Development Plans (2007) sets out a number of **mandatory objectives** that a development plan shall include e.g.

*Section 10(2) Without prejudice to the generality of subsection (1), a development plan shall include objectives for—*

- (c) the conservation and protection of the environment including, in particular, the archaeological and natural heritage and the conservation and protection of European sites and any other sites which may be prescribed for the purposes of this paragraph;*
- (ca) the encouragement, pursuant to Article 10 of the Habitats Directive, of the management of features of the landscape, such as traditional field boundaries, important for the ecological coherence of the Natura 2000 network and essential for the migration, dispersal and genetic exchange of wild species;*
- (e) the preservation of the character of the landscape where, and to the extent that, in the opinion of the planning authority, the proper planning and sustainable development of the area requires it, including the preservation of views and prospects and the amenities of places and features of natural beauty or interest;*
- (f) the protection of structures, or parts of structures, which are of special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest;*
- (g) the preservation of the character of architectural conservation areas;*
- (o) the preservation of public rights of way which give access to seashore, mountain, lakeshore, riverbank or other place of natural beauty or recreational utility, which public rights of way shall be identified both by marking them on at least one of the maps forming part of the development plan and by indicating their location on a list appended to the development plan, and*
- (p) landscape, in accordance with relevant policies or objectives for the time being of the Government or any Minister of the Government relating to providing a framework for identification, assessment, protection, management and planning of landscapes and developed having regard to the European Landscape Convention done at Florence on 20 October 2000. ]*

The mandatory requirement for inclusion of the above objectives is made without prejudice or qualification e.g. *‘that essential public infrastructure can be accommodated....’*. In addition, Development Plans must be consistent with the National Planning Framework and Regional Spatial and Economic Strategy (RSES) both of which set out a number of objectives in respect of protection of natural and culture heritage and climate action (e.g. NPF National Policy Objectives (NPO) - 17,52,54,58,59,60,63 and 75 and Regional Policy Objective (RPO) 6.7, 9.27).

In addition to the above, the provisions of Chapter 8 have been written to be compliant with existing statutory heritage legislation and policy context as set out in Section 8.4, 8.5, 8.9 and 8.10 of the chapter.

3. It is agreed the additional wording in MOV POL 33 usurps the role and function of the development management process. Any planning application for a project likely to have a

significant effect on a Natura 2000 site must be rigorously carried out in accordance with the European Habitats Directive 92/43/EEC. In the interest of clarity, it is recommended that the text in MOV OBJ 33, 36, 43, 47 and 49 ensures that the referenced project will be subject to the outcome of the Appropriate Assessment process. However, the text which follows will be removed. The requirement for plans and projects to undergo Appropriate Assessment are sufficiently and strongly supported in the Draft Plan by the standalone objectives HER OBJ 32 and HER OBJ 33 in Chapter 8 Cultural and Natural Heritage Strategy, which are consistent with the requirements of the Habitats Directive. This will not dilute the critical and binding force of Appropriate Assessment but will support Meath Council in their role of guaranteeing the full application of the Directive in a clear and precise manner.

#### Chief Executive's Recommendation

1. No change required.
2. No change required.
3. Amend MOV OBJ 33, MOV OBJ 36, MOV OBJ 43, MOV OBJ 47, MOV OBJ 49 to remove the following text in the above objectives: 'Development of the project will be subject to the outcome of the Appropriate Assessment process. ~~Where adverse effects on European site integrity are identified, alternative routes or designs will be developed to ensure that the project will not adversely affect the integrity of any European Site(s), the project will not be progressed unless an alternative solution can be implemented which avoids/reduces the impact to a level that the integrity of the European Site(s) is (are) unaffected.~~

<b>Submission No.:</b>	MH-C5-984
<b>Submitted by:</b>	John Madden Engineer
<b>Submission Theme(s):</b>	Chapter 8 Cultural and Natural Heritage Strategy
<b>Summary of Submission:</b>	
Record of Protected Structures – Submission to have a property at Higginstown, Athboy, County Meath put on the Record of Protected Structures. (Photographs included) at Eircode C15 K5W0.	
<b>Chief Executive's Response</b>	
<p>The vernacular qualities of this building are apparent in the scale and form of this house. It largely retains its original character.</p> <p>The proposed structure relates to Condition No. 14 of Planning Application Approval KA40407 (2004) which states ' Within one month of occupation of the dwelling house permitted in this application, the existing dwelling house on site shall be demolished and replaced'. The new permitted dwelling is a replacement dwelling for the subject cottage as proposed for addition to RPS.</p> <p>Assessment:</p> <ul style="list-style-type: none"> <li>- Windows have been replaced and are not original.</li> <li>- A corrugated tin roof perhaps covers a thatch roof below – no opening up has been carried out to determine.</li> <li>- Sand cement dash render externally – however walls are most likely to be stone with lime mortar. Internally lime wash has been layered over years on the internal face of the stone walls.</li> </ul>	

- Cills are stone but painted.
- Sand cement render bands around windows.
- Concrete floor slab – may be covering cobble or flag floor but indeterminate.
- One room internally has a sand cement render finish with a polystyrene false ceiling tile system.

There are numerous traditional farm cottages throughout County Meath that retain their original architectural features. There is not sufficient architectural merit or social history sufficient to warrant the listing of this structure on the list of Recorded Protected Structures. However, planning Condition 14 of Planning Approval KA40407 relates to the demolition of this cottage which has not been carried out in accordance with the planning condition. Based on the above, it is not proposed to include the structure on the RPS however, it is considered the building may have a value in being retained as an ancillary structure to the main complex and replacement house (non habitable). This could however only be done by amending the original planning permission KA40407

The County Development Plan contains policies to protect traditional vernacular buildings in urban and rural contexts.

Chapter 8.7.3 – Historic Building Stock and Vernacular Architecture HER POL 21, HER POL 22.

#### Chief Executive's Recommendation

No change recommended

<b>Submission No.:</b>	MH-C5-1001
<b>Submitted by:</b>	Meath Archaeological and Historical Society (MAHS)
<b>Submission Theme(s):</b>	Chapter 8 Cultural and Natural Heritage Strategy
<b>Summary of Submission:</b>	
<p>This submission relates to Cultural and Natural Heritage and raises the following issues under the a number of headings. A copy of the society's submission to the pre-draft public consultation process (February 2017) is enclosed.</p> <p><b>1.General Observation and national context</b></p> <p>(i) It is contended that there is not sufficient expertise in heritage matters at senior level in the Local Authority to effectively interact with the planning process and safeguard heritage.</p> <p>(ii) The submission reminds Meath County Council of the Government's national and regional objectives in relation to landscape and heritage as set out in the <i>National Planning Framework</i> (Strategic Priority 7, Objective 17, National Policy Objective 60); the <i>Regional Spatial and Economic Strategy (RESE)</i> (Regional Objective Outcome 7, Regional Policy Objective 6.7, 9.27,) and <i>National Development Plan</i>. It is the stated view of M.A.H.S. that County Meath Development Plan have fallen below these objectives and their track record of fulfilling their own stated objectives have been inadequate thereby putting heritage at risk.</p> <p>(iii) Addition of Heritage Policy 4 is welcomed, and the society trusts that it will be translated</p>	

down into the LAPs.

## **2.Landscape Conservation and Historic Landscapes (8.17.7 and 8.17.8 Her. Pol. 54 HER. OBJ. 50, 51, 52, 53 and 54)**

(i) Tara /Skryne and Lough Crew/Sliabh na Calliagh

The objectives in the plan to protect the archaeological heritage, rural character, setting and amenity of Tara/Skryne Landscape and Lough Crew/Sliabh na Calliagh landscape are noted. The submission highlights that similar objectives in the current plan (2013-2019) namely (LC OBJ 6 and LC OBJ 7 which have not been achieved and are both again included in the current draft plan, which in the society' opinion reflects badly on the Council's attitude to landscape and heritage. It is advised that the *Conservation Plan for State Owned Lands at Hill of Tara* be included in the County Development Plan.

(ii) It is recommended that the pilot project on the Historic Landscape Characterisation of the UNESCO Brú na Bóinne WHS be included in the Development Plan. *National Landscape Strategy for Ireland 2015-2025* should be attached with the Draft Plan for reference and it is recommended that paragraph 8.17.7 be amended to read: "*review, update and insert variations to Development Plan as may be required following publication of statutory guidelines for planning authorities on landscape character assessment*".

## **3.Protected View and Prospects: 8.18: HER OBJ 55/APPENDIX 10, MAP 8.6**

(i) The general designation of these protected views and prospects hasn't changed over various generations of county development plans we would urge Meath County Council to re-examine this as a matter of urgency.

(ii) Concern has been expressed that the description of protected views is of comprehensive and clear (direction and viewshed is not described, nor is location and extent of prospect Views described should have all necessary longitudinal and latitudinal indications).

(iii) It is stated that there is a mis-description of view no. 34 in the current proposed Draft Development Plan 2020-2026 compared with the current Plan and Brú an Bóinne Management Plan – and that this ambiguity should be resolved.

(iv) Disappointment had been expressed that there has been no examination of new protected views given that our understanding of the importance of landscape has increased in recent years.

## **4. Hedges and Trees (HER OBJ 37, 38, 39 and 40)**

MAHS welcomes review of 2011 study of hedgerow and trees to be carried out over the lifetime of the Plan. Would ask the 2011 be attached to the draft Plan and recommend that Tara Skryne and Slieve na Calliagh/Lough crew be first to be covered in the review and HLC for Brú na Bóinne WHS be attached to the plan and that it covers hedgerows and tress.

## **5. Bog Site Designations (Tables 8.1 and 8.2)**

The submission states that there is an error in relation to site coding for bogs listed below namely Mount Hevey Bog and Girley Bog are both listed as pNHAs and cSACs both with different site codes.

## **6. Brú na Bóinne WHS**

(i) While Brú and Bóinne Management Plan 2017 is attached to the Draft Plan there is no indication it will be part of the Meath County Development Plan 2020-2026.

(ii) The submission notes the omission of important clauses that are in the current 2013-2019 Plan – CH OBJ 8 '*utilise available LIDAR imagery data and viewshed analysis derived from it to as a tool to guide and inform, development management of UNESCO WHS Brú na Bóinne*', and, '*there should be no intervisibility between development site and national monuments of*

*Newgrange, Knowth and Dowth up to and including apex of roof*. It is asked that these omissions be rectified and included in the new Plan.

## **7. Protection of Archaeological Sites and Monuments**

- (i) Greater clarity is needed as to the extent of protection that will be afforded to archaeological sites, monuments and objects including undiscovered and newly discovered remains and sites- and the means whereby this policy can be effectively carried out.
- (ii) A County Archaeologist should be employed in the Local Authority (at a grade commensurate with the responsibilities involved)
- (iii) The setting up a National Monuments Advisory Council for the county and consultation with local historical societies in Meath would aid this work.

## **8. Protection and Promotion of Heritage - County Museum and County Archives**

County Museum – The absence of a County Museum is a serious deficiency for the county. The Development Plan should contain a policy statement in relation to this. Meath County Council should provide an interim heritage repository where heritage objects in need of protection and conservation could be taken in, stored, protected and catalogued.

County Archives – The society greatly welcomes the recent initiatives to establish a County Archive for Meath and employ a Senior Archivist.

## **9. Orbital Route**

MAHS is opposed to the location of the Leinster Orbital Route anywhere within the hinterland of the Tara Skryne archaeological and cultural landscape.

## **Chief Executive's Response**

### **1. General Observation and national context**

(i) The observations in relation to the heritage staffing levels/and seniority of grade within the Planning Department is noted. However, it is not the purpose of the Development Plan to deal with staff resources. The Council's human resource requirement is driven by a workforce planning process which ensures that the Council is appropriately staffed so as to deliver required services. It also ensures that the Council appropriately utilises the staffing complement and associated skill-sets available. The Council will continue to seek to ensure appropriate staffing by way of this workforce planning process. It must also be noted that national staffing approval requirements remain in place across the local government sector in terms of the creation of any new positions. The Council must adhere to these obligations as well as overall budgetary implications.

(ii) . Meath County is satisfied that the policies and objectives as set out in Chapter 8 *Cultural and Natural Heritage Strategy* of the County Development Plan are consistent with National Planning Framework (NPF) and Regional Spatial and Economic Strategy (RSES).

In relation to the Council's track record in fulfilling our stated objectives, the Meath County Development Plan 2013 – 2019 was formally made on 17th December 2012 and came into effect on 22nd January 2013. In accordance with the requirements of Section 15(2) of the Planning and Development Acts 2000-2019, the Chief Executive' *of the planning authority shall, not more than 2 years after the making of a development plan, give a report to the members of the authority on the progress achieved in securing the objectives referred to in subsection (1)*'. A 2-Year Progress report was prepared in December 2014 and is available <https://meathcountydevelopmentplan.files.wordpress.com/2016/07/2-year-progress->

[report review 20032015.pdf](#). It should be noted that the progress report as published relates only to the first 2 years post adoption, and that the time period is part of a 6 year Development Plan life cycle. [The Council's Annual report also provides information in relation to the performance of the Council's functions. All relevant issues arising during the implementation of the existing plan have been addressed and incorporated into the current Draft Plan.](#)

(iii) It is the Chief Executive's view that HER POL 4 is an overarching policy that applies to all areas in County Meath and shall be appropriately incorporated into respective Local Area Plans.

## **2.Landscape Conservation and Historic Landscapes (8.17.7 and 8.17.8 Her. Pol. 54 Her. Obj. 50, 51, 52, 53 and 54)**

(i) The decision in relation to the designation of Landscape Conservation Area is a reserved function of elected members of Meath County Council. The elected members having considered the proposed order and the submissions and observations may by resolution make the order with or without modifications or refuse to make the order. Section 204 of the Planning and Development Acts 2000 (as amended) does not set out statutory timeframes as to how long the Elected Members have to consider any proposed order. Thus, the process has not concluded. The Draft Meath County Development Plan 2021-2027 contains an objective to support the designation of a Landscape Conservation Area for Tara (HER OBJ 51).

The *Conservation Management Plan for the State-Owned Lands at the Hill of Tara* is not yet finalised. However, the Plan contains an objective (HER OBJ 53) to work in partnership with the Department of Culture, Heritage and the Gaeltacht to complete and implement this plan.

ii) and (iii) It is submitted that the *Brú na Bóinne Historic Landscape Characterisation (Pilot)* and *National Landscape Strategy* should be included and attached to the Development Plan. In the drafting of a Development Plan the Council draws on a significant volume of national guidelines, national and regional policies, existing research and data and reference material. These sources are referenced throughout the text (with hyperlinks included where available). It is not necessary nor desirable to attach or include this volume of material within the Development Plan as to do so would make the document too unwieldy. It is the council's view that HER OBJ 50 covers the text suggested to be inserted in Section 8.17.7, as the National Landscape Character Assessment outlined in Action 3 of the *National Landscape Strategy* incorporates Historic Landscape Characterisation.

## **3.Protected View and Prospects: 8.18: HER OBJ 55/APPENDIX 10, MAP 8.6**

(i) Meath Council notes the observation in relation to undertaking a review of protected views in the county. A new objective will be inserted in the plan to undertake such a review.

(ii) In relation to Protected View No. 34 – the description in the current Plan 2013-2019 and the Draft Plan 2021-2027 is consistent –‘*View of Boyne Valley with open view of Knowth and Newgrange. Mixed composition of working landscape. Slane visible on left (west). Roads, power lines and housing visible*’. When consultants engaged on behalf of Meath County Council undertook a field survey of protected views, they identified that the location marker on the current Development Plan Map 2013-2019 outlining those views was incorrect and the location was repositioning to be in accordance with the description of the view and its direction (which were left unchanged). The Draft Plan contains the correct location marker on the maps. The location text in the table has reflects this repositioning.

## **4. Hedges and Trees (HER OBJ 37, 38, 39 and 40)**



Meath County Council notes that a review of the 2011 study is welcomed and the recommendation that Tara Skryne and Slieve na Calliagh/Lough Crew areas be included as a priority by the review. It is not necessary nor desirable to attach or include this volume of material within the Development Plan. A copy of the *County Meath Tree, Woodland and Hedgerow Survey* (2011) and *Pilot Historic Landscape Conservation Area for Brú na Bóinne* report is available in the Local Studies Section of Navan Library.

#### **5. Bog Site Designations (Tables 8.1 and 8.2)**

The site coding is different as they refer to three different nature conservation designations - Special Area of Conservation (or candidate) (SAC), Natural Heritage Areas (NHAs) or proposed Natural Heritage Area (pNHA). These designations can co-exist for the one site. For example, all of Girley Bog is a Natural Heritage Area but only part of the bog is a candidate Special Area of Conservation.

#### **6. Brú na Bóinne WHS**

(i) The Brú na Bóinne World Heritage Site Management Plan (2017) does form part of the Draft Plan – See Appendix 8 and HER POL 11 refers.

(ii) Meath County Council acknowledge this omission. The Draft Plan (Appendix 8) contained two parts (a) Planning Guidance and supporting information for the UNESCO World Heritage Site of Brú na Bóinne and (b) The Brú na Bóinne World Heritage Site Management Plan (2017). Due to a printing error only part (b) of Appendix 8 was published. It is now the Council's intention to publish *Appendix 8(a). Planning Guidance and supporting information for the UNESCO World Heritage Site of Brú na Bóinne* as part of the material amendments to the Draft Plan.

#### **7. Protection of Archaeological Sites and Monuments**

(i) The Draft Plan contains a number of policies and objectives in relation to the protection of the county's archaeological heritage (HER POL 1, HER POL 2, HER POL 3, HER POL 4, HER POL 5 and HER OBJ 2, HER OBJ 3, HER OBJ 4 refers. The Council considers that '*undiscovered and newly discovered archaeological remains*' is included in the HER OBJ 5.

(ii) Under Planning and Development legislation the Minister for Culture, Heritage and the Gaeltacht is a statutory consultee in relation to potential impacts of any proposed development on the archaeological heritage. This allows the Minister to recommend that archaeological conditions be attached to grants of planning permission or recommend refusal of planning permission by the planning authority to ensure the protection of the archaeological heritage. National Monuments Service provides expert advice from an archaeological perspective to Meath County Council on planning and other relevant authorities in respect of individual planning, development applications and other projects and plans.

Meath County Council does have the services of a Project Archaeologist who provides archaeological expertise and advice to our Transportation Department and other departments on a project by project basis.

(iii) The *County Meath Heritage Plan 2015-2020* contains an action to *Establish a Historic Monuments Advisory Committee*.

#### **8. County Museum and County Archive**

##### **(i) County Museum**



A well-resourced County Museum would be a significant contribution to the cultural infrastructure of Meath. The establishment of a museum would need to be considered within the context of establishing a museum service in the county and would require the consideration of a number of factors including (but not limited to): initial capital investment, on-going operational costs, staffing, collections and care of collections, storage, outreach and education, the building (and environmental conditions and considerations).

It is an action of the County Meath Heritage Plan 2015-2020 to 'Support a feasibility study on the provision of a county museum in consultation with national and local stakeholders and explore the development of a virtual (online) museum' (Action 5.7). A decision on a policy statement on a county museum would be premature pending the outcome of such a study.

## **(ii) County Archives**

The positive comments from MAHS on the recent initiatives to establish a County Archives for Meath is noted.

## **9. Orbital Route**

The comments in relation to the Leinster Orbital Route (LOR) are noted. However, there have been no constraints studies and/or route selection undertaken for the LOR.

## **Chief Executive's Recommendation**

### **1.General Observation and national context**

- (i) No change recommended.
- (ii) No change recommended.
- (iii) No change required.

### **2.Landscape Conservation and Historic Landscapes**

- (i) No change required.
- (ii) No change required
- (iii) No change required.

### **3.Protected View and Prospects**

**(i), (ii) and (iv)** Insert the following new objective – **HER OBJ XX To undertake a review of existing protected views and prospects contained in the County Development Plan and to assess and consider additional views and prospects deemed worthy of inclusion/protection.**

(iii) No change required.

### **4. Hedges and Trees (HER OBJ 37, 38, 39 and 40)**

No change required.

### **5. Bog Site Designations**

No change required

### **6. Brú na Bóinne WHS**

- (i) No change required
- (ii) Insertion of **Appendix 8 (a) UNESCO World Heritage Site Supporting Information**

### **7. Protection of Archaeological Sites and Monuments**

(i), (ii), (iii) No change required.

**8. County Museum and County Archive**

No change required.

**9. Orbital Route**

No change required.

<b>Submission No.:</b>	MH-C5-1012
<b>Submitted by:</b>	Meath Wind Information Group (MWIG)
<b>Submission Theme(s):</b>	Chapter 8 Cultural and Natural Heritage Strategy
<b>Summary of Submission:</b>	
<p>The submission relates only to concerns regarding the rich heritage of north Meath.</p> <p><b>A. World Heritage Sites</b></p> <p>The submission gives details of sites in County Meath on Ireland's Tentative World Heritage List – <i>Tara Complex (as part of the Royal Sites of Ireland) and Kells (as part of the Early Medieval Monastic Sites)</i>. MWIG submit that the Meath County Council should pursue with vigour World Heritage Status for these two sites. It is stated that having three World Heritage Sites within the county would increase draw for tourist and would increase overnights stays in the county thus boosting the local economy.</p> <p><b>B. North Meath Heritage Landscape</b></p> <p>It is stated that a core objective of the National Landscape Strategy is to '<i>strengthen public participation</i>'. In the opinion of MWIG '<i>the public focus, should weigh more heavily on the residents of the particular landscape in question rather than the wider general public</i>' and that local representatives should have a crucial input in the setting out of development plans.</p> <p>Tourists visit Ireland in large numbers to appreciate the history and heritage of our country which is reflected in our landscape. The development plan must protect the character of the landscape with reference to the visual landscape of our heritage landscape. MWIG suggest that Meath County Council should submit the heritage landscape of North Meath for inclusion on Ireland's Tentative World Heritage List.</p> <p><b>C. Meath Landscape Character Assessment</b></p> <p>The submission asserts that the Landscape Character Assessment is inadequate and out of data and questions 'loose descriptions and terminology used'. MWIG notes that a number of landowners and developers have sought the re-zoning of lands in the culturally significant landscapes of north Meath. It is pointed out that the visual significance of the landscape that can be viewed from Lloyd and the early Monastic Site. They contend that the 'existing landscape character assessment is unsuitable to any zoning considerations'. MWIG request that a nationally approved body carry out a new Landscape Character Assessment of County Meath in accordance with the European Landscape Convention guidelines and National Landscape Strategy.</p> <p><b>D. Planning Consideration for Wind Energy Projects</b></p> <p>It is asserted that that the it is clear from the wind atlas produced by SEAI and Met Eireann that the only place of note in Meath is offshore. MWIG requests that the development plan reflects this reality and has a clear policy that renewable energy will be attained by concentrating wind energy projects off shore only. Examples of recent case law are presented, and the authors submit that should a windfarm development come before the council they must consider both the development and the grid connection (and cite Oriel windfarm as an example). MWIG objects to point made by the IWEA in their submission to the draft plan that the council refrain from using the wind atlas issued by SEAI. The submission makes reference to An Bord Pleanála refusal of two windfarms in North Meath and urges the council to view the Bord's findings as an irrevocable precedent to which future wind development should be referred.</p> <p>MWIG urge the council to consider that wind speeds are a crucial component in wind energy and</p>	

suggest that that the Council consider the SEAI Wind Atlas as the definitive guide in wind speeds in Ireland; (it is noted that the revised wind energy guidelines refers to SEAI Wind Atlas). The Council are asked to consider that wind energy generation is not economically viable where wind speeds are less than 10m/s.

The MWIG requests that the Council adheres to the WHO Environmental Noise Guidelines for the European Region (2018) (section 1.3 revised guidelines) and to force developers to comply with directives 2002/49/EC and to use this directive to identify noise pollution as per revised guidelines.

### **Chief Executive's Response**

#### **A. World Heritage Sites**

The Department of Culture, Heritage and the Gaeltacht acts on behalf of Ireland as a State Party to the World Heritage Convention. It is responsible for the submission of nomination documentation to UNESCO for inclusion of properties on the World Heritage List and for reporting to UNESCO on the state of conservation of our World Heritage properties. Section 8.6.4 of the Draft Plan sets out the background to and contains a policy context for sites in Meath on Ireland's World Heritage Tentative List (HER POL 12 and HER OBJ 13 refers). Meath County Council in the Draft Plan commits to support the state in the nomination process of Tara and Kells to World Heritage status in co-operation with relevant Local Authorities and other relevant bodies.

#### **B. North Meath Heritage Landscape**

The submission states that local representatives should have a crucial input in the setting out of development plans. The making of a development plan is a reserve function of the Elected Representatives of Meath County Council as set on in Section 9,12 and 13 of the Planning and Development Act 2000 (as amended) and the current process of public consultation provided members of the public to engage in the process. The Chief Executives Report is a response of the Executive of Meath County Council to the issues raised in submissions and this will further be further considered by its members in late October 2020.

The Draft Plan contains detailed objectives for the preservation of the character of the landscape where, and to the extent that, in the opinion of Meath County Council, the proper planning and sustainable development of the area requires it, including the preservation of views and prospects and the amenities of places and features of natural beauty or interest (Section 8.17 and HER POL 52, 53, 54 and HER OBJ 48, 49, 50, 51, 52,53, 54, 55 and Appendix 5 Meath Landscape Character Assessment refers). The submission requests that Meath County Council should pursue at national level for the inclusion of '*the heritage landscape of North Meath*'. No criteria for its inclusion in respect of Outstanding Universal Value is offered nor an area proposed that aligns with a Landscape Character Area as set out in the Landscape Character Assessment. It is contended that there are sufficient policies and objectives contained with the Draft Plan to protect that heritage value of the landscapes of North Meath.

#### **C. Meath Landscape Character Assessment**

Draft Guidelines for Landscape Character Assessment were published by the DoEHLG in 2000 and a Landscape Character Assessment for the County was carried out in 2007. A key objective of The *National Landscape Strategy 2015-2025* is to develop a National Landscape Character Assessment and to publish statutory guidelines on local Landscape Character Assessments, following best international practices and incorporating Historic Landscape Characterization for Planning Authorities. To date this work has not been complete by relevant Government Departments, therefore and in that context, it is the opinion of Meath County Council that a review of the Meath Landscape Character Assessment would be premature pending the outcome of the

development of National Landscape Character Assessment. Meath County Council is committed to supporting and implementing the provisions of the National Landscape Strategy (HER OBJ 47) and to 'review and update (if required), in the context of a regional approach to landscape assessment, the County Landscape Character Assessment following publication of statutory guidelines for Planning Authorities on local Landscape Character Assessments, as outlined in the National Landscape Strategy 2015-2025' (HER OBJ 50).

**D. Planning Consideration for Wind Energy Projects**

Meath County Council in making any assessment in relation to future wind energy project will have regard to all to all relevant DEHPG policy, guidelines and be cognisant of decisions by An Bord Pleanála. Meath County Council are committed to the preparation of a Renewable Energy Strategy during the lifetime of the Development Plan. This is supported by INF OBJ 47 of the Draft Plan.

**Chief Executive's Recommendation**

No change recommended.

# Chapter 9

## Rural Development Strategy

<b>Submission No.:</b>	MH-C5-2
<b>Submitted by:</b>	Damien O' Reilly
<b>Submission Theme(s):</b>	Chapter 9 Rural Development Strategy
<b>Summary of Submission:</b>	
Submission requests that a new rural objective i.e. rural objective 29 be included as a mechanism to review and extend 'Rural Nodes' boundaries on a yearly basis if needed as per land usage. It is submitted that 'Leapfrogging' must be implemented if land owners in Rural Nodes do not engage with active land management i.e. refusing to sell sites.	
<b>Chief Executive's Response</b>	
This issue was previously raised as part of the NOMS. A review of the Rural Node policy will be undertaken within two years of the adoption of the Plan as part of the mandatory 2 year report on the progress of the Development Plan under section 15 (2) of the Act.	
<b>Chief Executive's Recommendation</b>	
No change recommended.	

<b>Submission No.:</b>	MH-C5-14
<b>Submitted by:</b>	Damian O' Reilly
<b>Submission Theme(s):</b>	Chapter 9 Rural Development Chapter
<b>Summary of Submission:</b>	
Submission requests the designation of Mulhussey, Kilcock as a Rural Node.	
<b>Chief Executive's Response</b>	
<p>There are currently 50 identified Rural Nodes within the Draft Plan to cater for rural generated housing need. These Rural Nodes have a strong residential focus and are based on a small number of individual houses. They provide an alternative to one-off housing in the countryside through the consolidation of rural residential development within existing small settlements. It is envisaged that for the most part, they will provide an opportunity for family members of existing households within the Node to build a new home, or reuse and adapt an existing structure, in proximity to their family home, by subdividing large sites.</p> <p>This submission along with others requests the designation of an additional Rural Node. The designation of additional Rural Nodes within the County would represent a piecemeal uncoordinated approach for designating land for which there is no evidence-based need.</p> <p>The quantum and location of land identified for development in the County is directly influenced by the Development Plan's Settlement and Core Strategy. Based on the evidence-based approach adopted in the Core Strategy for the County, it is clear, that Meath has a significant and sufficient quantum of land designated to meet the regional targets for the Development Plan period.</p> <p>There are lands designated in rural villages and rural nodes that are sufficient in area to accommodate local rural based housing need across the County. In this instance the close-by</p>	



existing designated rural nodes at Kilcloon, Batterstown, Culmullin, Moynalvy and Coole are adequate in area to accommodate local rural based housing need. There is also significant provision available within the adjoining rural villages and the larger urban settlement at Kilcock.

Furthermore, designating additional rural nodes would result in a development pattern with deficiencies in terms of the provision of basic infrastructure and public services, in addition to unsustainable travel patterns, encroachment onto and loss of valuable agricultural and adverse visual impact.

In conclusion, there is no evidence-based need or planning rationale for the designation of new rural nodes which would be in breach of the Core Strategy of the Draft Plan and the Regional Spatial and Economic Strategy and as such would be contrary to proper planning and sustainable development.

#### **Chief Executive's Recommendation**

No change recommended.

<b>Submission No.:</b>	MH-C5-15
<b>Submitted by:</b>	Damien O' Reilly
<b>Submission Theme(s):</b>	Chapter 9 Rural Development Strategy
<b>Summary of Submission:</b>	
Submission requests that the Bush, Dunshaughlin is included as a Rural Node.	
<b>Chief Executive's Response</b>	
<p>There are currently 50 identified Rural Nodes within the Draft Plan to cater for rural generated housing need. These Rural Nodes have a strong residential focus and are based on a small number of individual houses. They provide an alternative to one-off housing in the countryside through the consolidation of rural residential development within existing small settlements. It is envisaged that for the most part, they will provide an opportunity for family members of existing households within the Node to build a new home, or reuse and adapt an existing structure, in proximity to their family home, by subdividing large sites.</p> <p>This submission along with many others requests the designation of an additional Rural Node. The designation of additional Rural Nodes within the County would represent a piecemeal uncoordinated approach for designating land for which there is no evidence-based need.</p> <p>The quantum and location of land identified for development in the County is directly influenced by the Development Plan's Settlement and Core Strategy. Based on the evidence-based approach adopted in the Core Strategy for the County, it is clear, that Meath has a significant and sufficient quantum of land designated to meet the regional targets for the Development Plan period.</p> <p>The lands designated in rural villages and rural nodes are sufficient in area to accommodate local rural based housing need across the County. In this instance the close-by rural node at Batterstown is adequate in area to accommodate the local rural based housing need in this area. There is also significant provision available within the larger urban settlements at Dunshaughlin and Ratoath.</p> <p>Furthermore, designating additional rural nodes would result in a development pattern with</p>	

deficiencies in terms of the provision of basic infrastructure and public services, in addition to unsustainable travel patterns, encroachment onto and loss of valuable agricultural and adverse visual impact.

In conclusion, there is no evidence-based need or planning rationale for the designation of new rural nodes which would be in breach of the Core Strategy of the Draft Plan and the Regional Spatial and Economic Strategy and as such would be contrary to proper planning and sustainable development.

#### **Chief Executive's Recommendation**

No change recommended.

<b>Submission No.:</b>	MH-C5-38
<b>Submission by:</b>	Michael Fox
<b>Submission Theme(s):</b>	Chapter 9 Rural Development Strategy
<b>Summary of Submission:</b>	
Submission requests that Greetiagh Village is designated as a Rural Node.	
<b>Chief Executive's Response</b>	
<p>This issue was previously raised as part of the NOMS by Elected Members.</p> <p>There are currently 50 identified Rural Nodes within the Draft Plan to cater for rural generated housing need. These Rural Nodes have a strong residential focus and are based on a small number of individual houses. They provide an alternative to one-off housing in the countryside through the consolidation of rural residential development within existing small settlements. It is envisaged that for the most part, they will provide an opportunity for family members of existing households within the Node to build a new home, or reuse and adapt an existing structure, in proximity to their family home, by subdividing large sites.</p> <p>This submission along with others requests the designation of an additional Rural Nodes. The designation of additional Rural Nodes within the County would represent a piecemeal uncoordinated approach for designating land for which there is no evidence-based need.</p> <p>The quantum and location of land identified for development in the County is directly influenced by the Development Plan's Settlement and Core Strategy. Based on the evidence-based approach adopted in the Core Strategy for the County, it is clear, that Meath has a significant and sufficient quantum of land designated to meet the regional targets for the Development Plan period.</p> <p>There are lands designated in rural villages and rural nodes that are sufficient in area to accommodate local rural based housing need across the County. In this instance the close-by designated rural node at Bohermeen , approximately 1km to the south-east as well as Boyerstown and Cortown Rural Nodes contain sufficient lands to support rural-generated dwellings for members of the rural community in Greetiagh. It is noteworthy also, that there is significant provision made for new housing development in Navan.</p> <p>Furthermore, designating additional rural nodes would result in a development pattern with deficiencies in terms of the provision of basic infrastructure and public services, in addition to unsustainable travel patterns and encroachment onto and loss of valuable agricultural and lands.</p>	

In conclusion, there is no evidence-based need or planning rationale for the designation of new rural nodes which would be in breach of the Core Strategy of the Draft Plan and the Regional Spatial and Economic Strategy and as such would be contrary to proper planning and sustainable development.

**Chief Executive's Recommendation**

No change recommended.

<b>Submission No.(s):</b>	MH-C5-40
<b>Submission by:</b>	Comharchumann Ráth Chairn
<b>Submission Theme(s):</b>	Chapter 9 Rural Development Strategy
<b>Summary of Submission:</b>	
<p>Details the history of the Ráth Chairn Gaeltacht established in 1935 and provides information on the wide range of services and activities provided by Comharchumann Ráth Chairn. The main points raised in the submission are;</p> <ol style="list-style-type: none"> <li>1. There is a statutory obligation for a language impact assessment for proposed development in the Gaeltacht area.</li> <li>2. Calls for restrictions on the selling of houses to Irish speakers which would last for 15 years and prevent the letting of houses for periods longer than 3 months in any one year, to anyone other than Irish language speakers.</li> <li>3. Recommends that a B2 level or higher proficiency in spoken Irish on the Common European Framework of Reference for Languages (Council of Europe 2001) should be the accepted standard.</li> <li>4. Recommends that housing estates should not be permitted in Ráth Chairn Gaeltacht Area</li> <li>5. Recommends that language conditions are not imposed on people who are originally from the Ráth Chairn Gaeltacht and that people with a local housing requirement are dealt with, without fulfilling further requirements.</li> <li>6. States that there are areas in the periphery of the Gaeltacht where the Irish language is not being used much and therefore Comharchumann would have no issue with the policies suggested above not being applicable to that area.</li> </ol>	
<b>Chief Executive's Response</b>	
<p>It is considered that the existing policy as prescribed including the requirement for a Linguistic Impact Assessment ( OBJ 43 ) is sufficiently robust to ensure the protection and enhancement of the Gaeltachts unique linguistic and cultural setting.</p> <p>With respect of points no. 5 and 6 please refer to submission no..958.</p>	
<b>Chief Executive's Recommendation</b>	
Please refer to submission no. 958	

<b>Submission No.:</b>	MH-C5-56
<b>Submission by:</b>	Damian O' Reilly
<b>Submission Theme(s):</b>	Chapter 9 Rural Development Strategy
<b>Summary of Submission:</b>	
<p>Submission requests the addition of the following Rural Nodes:</p> <ul style="list-style-type: none"> <li>• Barstown, Dunboyne/The Hatchet Dunboyne.</li> <li>• Warrenstown, Kilcock.</li> </ul>	
<b>Chief Executive's Response</b>	
<p>There are currently 50 identified Rural Nodes within the Draft Plan to cater for rural generated housing need. These Rural Nodes have a strong residential focus and are based on a small number of individual houses. They provide an alternative to one-off housing in the countryside through the consolidation of rural residential development within existing small settlements. It is envisaged that for the most part, they will provide an opportunity for family members of existing households within the Node to build a new home, or reuse and adapt an existing structure, in proximity to their family home, by subdividing large sites.</p> <p>This submission along with others requests the designation of an additional Rural Nodes. The designation of additional Rural Nodes within the County would represent a piecemeal uncoordinated approach for designating land for which there is no evidence-based need.</p> <p>The quantum and location of land identified for development in the County is directly influenced by the Development Plan's Settlement and Core Strategy. Based on the evidence-based approach adopted in the Core Strategy for the County, it is clear, that Meath has a significant and sufficient quantum of land designated to meet the regional targets for the Development Plan period.</p> <p>There are lands designated in rural villages and rural nodes that are sufficient in area to accommodate local rural based housing need across the County. In this instance the close-by existing designated rural nodes at Kilcloon, Batterstown and Culmullen are adequate in area to accommodate local rural based housing need. There is also provision available within the adjoining rural villages at Summerhill and the larger urban settlements of Dunshaughlin and Maynooth.</p> <p>Furthermore, designating additional rural nodes would result in a development pattern with deficiencies in terms of the provision of basic infrastructure and public services, in addition to unsustainable travel patterns, encroachment onto and loss of valuable agricultural lands and adverse visual impact.</p> <p>In conclusion, there is no evidence-based need or planning rationale for the designation of new rural nodes which would be in breach of the Core Strategy of the Draft Plan and the Regional Spatial and Economic Strategy and as such would be contrary to proper planning and sustainable development.</p>	
<b>Chief Executive's Recommendation</b>	
No change recommended.	

<b>Submission No.:</b>	MH-C5-85
<b>Submission by:</b>	Barry McDonough
<b>Submission Theme(s):</b>	Chapter 9 Rural Development Strategy and Chapter 3 Settlement and Housing Strategy
<b>Summary of Submission</b>	
<p>This submission refers to a plot of land at Cushinstown and requests</p> <ul style="list-style-type: none"> <li>the designation of lands as a Rural Node or alternatively</li> <li>the zoning of the lands for residential purposes.</li> </ul> <p>A map accompanies the submission which identifies the relevant lands. The subject lands are located to the north of Cushinstown Rural Node.</p>	
<b>Chief Executive's Response</b>	
<p>There are currently 50 identified Rural Nodes within the Draft Plan to cater for rural generated housing need. These Rural Nodes have a strong residential focus and are based on a small number of individual houses. They provide an alternative to one-off housing in the countryside through the consolidation of rural residential development within existing small settlements. It is envisaged that for the most part, they will provide an opportunity for family members of existing households within the Node to build a new home, or reuse and adapt an existing structure, in proximity to their family home, by subdividing large sites.</p> <p>This submission along with others requests the designation of an additional Rural Nodes. The designation of additional Rural Nodes within the County would represent a piecemeal uncoordinated approach for designating land for which there is no evidence-based need.</p> <p>The quantum and location of land identified for development in the County is directly influenced by the Development Plan's Settlement and Core Strategy. Based on the evidence-based approach adopted in the Core Strategy for the County, it is clear, that Meath has a significant and sufficient quantum of land designated to meet the regional targets for the Development Plan period.</p> <p>The lands designated in rural villages and rural nodes are sufficient in area to accommodate local rural based housing need across the County. In this instance lands are already identified at Cushinstown as a Rural Node in very close proximity to the subject lands to the south and in the close-by designated rural nodes of Curragha, Edoxstown and Ardcath. There is also significant provision available within the adjoining rural villages and the larger urban settlements at Ashbourne and Ratoath.</p> <p>Furthermore, designating additional rural nodes would result in a development pattern with deficiencies in terms of the provision of basic infrastructure and public services, in addition to unsustainable travel patterns, encroachment onto and loss of valuable agricultural lands and adverse visual impact.</p> <p>In conclusion, there is no evidence-based need or planning rationale for the designation of new rural nodes which would be in breach of the Core Strategy of the Draft Plan and the Regional Spatial and Economic Strategy and as such would be contrary to proper planning and sustainable development.</p>	

**Chief Executive's Recommendation**

No change recommended.

<b>Submission No.:</b>	MH-C5-87
<b>Submission by:</b>	Christopher O'Rourke Spatial Planner on behalf of Jackie Howard
<b>Submission Theme(s):</b>	Chapter 9 Rural Development Strategy and Chapter 3 Settlement and Housing Strategy

**Summary of Submission**

This submission refers to a plot of land at Clonalvy and requests to have the land zoned or zoned as a rural node. Under the principle of building communities, the submission proposes as part of the zoning to give the lands to the community for a Hot Desk Business Centre and/or other community uses.

The submission states that the ideal solution would be to zone the lands for housing and move the development boundary. The next solution would be to place lands as a rural node.

Clonalvy is a typical Meath village that has lost out over the years and urgently needs new housing, businesses and job creating community services and this holding is ideally placed to deliver same.

**Chief Executive's Response**

There are currently 50 identified Rural Nodes within the Draft Plan to cater for rural generated housing need. These Rural Nodes have a strong residential focus and are based on a small number of individual houses. They provide an alternative to one-off housing in the countryside through the consolidation of rural residential development within existing small settlements. It is envisaged that for the most part, they will provide an opportunity for family members of existing households within the Node to build a new home, or reuse and adapt an existing structure, in proximity to their family home, by subdividing large sites.

This submission along with many others requests extending the boundaries of Rural Nodes. Extending rural nodes on an ad hoc basis would represent a piecemeal uncoordinated approach for designating land for which there is no evidence-based need.

The quantum and location of land identified for development in the County is directly influenced by the Development Plan's Settlement and Core Strategy. Based on the evidence-based approach adopted in the Core Strategy for the County, it is clear, that Meath has a significant and sufficient quantum of land designated to meet the regional targets for the Development Plan period.

There are lands designated in rural villages and rural nodes to accommodate local rural based housing need across the County. In this instance it is considered that the area of land already designated in Clonalvy contains sufficient lands to support rural-generated dwellings for members of the rural community of Clonalvy. It is noteworthy also that Ardcath rural node is also in close proximity.

In conclusion, there is no evidence-based need or planning rationale for the extension of this rural node which would be in breach of the Core Strategy of the Draft Plan and the Regional Spatial and Economic Strategy and as such would be contrary to proper planning and sustainable

development.

**Chief Executive's Recommendation**

No change recommended.

**Submission No.:**

MH-C5-91

**Submitted by:**

Cllr. Damien O'Reilly

**Submission Theme(s):**

Chapter 9 Rural Development Strategy

**Summary of Submission:**

This submission relates to the Rural Development Strategy and seeks a new objective stating the following:

- (1) Maintaining Returning emigrants' access to build homes in their townland areas on suitable sites.

The Planning Authority continues to recognise the interest of persons local to or linked to a rural area, who are not engaged in significant agricultural or rural resource related occupation, to live in rural areas. For the purposes of this policy section, persons local to an area are considered to include:

Returning emigrants who have lived for substantial parts of their lives in rural areas, then moved abroad and who now wish to return to reside near other family members, to work locally, to care for older members of their family or to retire.

**Chief Executive's Response**

Applications by returning emigrants for rural housing are considered in accordance with Table 9.3 b) Schedule of Local Need (refer to Appendix F-updated Rural Settlement Strategy). This is considered sufficient to meet the needs of returning emigrants and appropriate in the context of the overall rural development strategy.

**Chief Executive's Recommendation**

No change recommended.

**Submission No.:**

MH-C5-97

**Submitted by:**

Cllr. Stephen McKee

**Submission Theme(s):**

Chapter 9 – Rural Development Strategy

**Summary of Submissions:**

Can you please include Balrath, Navan as a Rural Node?

**Chief Executive's Response**

There are currently 50 identified Rural Nodes within the Draft Plan to cater for rural generated housing need. These Rural Nodes have a strong residential focus and are based on a small number of individual houses. They provide an alternative to one-off housing in the countryside through the consolidation of rural residential development within existing small settlements. It is envisaged that for the most part, they will provide an opportunity for family members of existing households within the Node to build a new home, or reuse and adapt an existing structure, in proximity to their family home, by subdividing large sites.



This submission along with others requests the designation of an additional Rural Nodes. The designation of additional Rural Nodes within the County would represent a piecemeal uncoordinated approach for designating land for which there is no evidence-based need.

The quantum and location of land identified for development in the County is directly influenced by the Development Plan's Settlement and Core Strategy. Based on the evidence-based approach adopted in the Core Strategy for the County, it is clear, that Meath has a significant and sufficient quantum of land designated to meet the regional targets for the Development Plan period.

Lands designated in the rural villages and rural nodes are sufficient in area to accommodate local rural based housing need across the County. In this instance the close-by existing designated rural node of Edoxstown is adequate in area to accommodate local rural based housing need. There is also provision available within the adjoining rural village of Kentstown.

Furthermore, designating additional rural nodes would result in a development pattern with deficiencies in terms of the provision of basic infrastructure and public services, in addition to unsustainable travel patterns, encroachment onto and loss of valuable agricultural lands and adverse visual impact.

In conclusion, there is no evidence-based need or planning rationale for the designation of new rural nodes which would be in breach of the Core Strategy of the Draft Plan and the Regional Spatial and Economic Strategy and as such would be contrary to proper planning and sustainable development.

#### **Chief Executive's Recommendation**

No change recommended.

<b>Submission No.:</b>	MH-C5-110
<b>Submitted by:</b>	Pearse Callaghan
<b>Submission Theme(s):</b>	Chapter 9 Rural Development Strategy
<b>Summary of Submissions:</b>	
This submission relates to a Rural Node at Bohermeen and seeks for an additional 4.86 hectares of land to be included in the rural node for the delivery of rural housing. It is submitted that the lands could provide for serviced sites, would be consistent with the compact growth approach outlined in the NPF and RSES and would generally be appropriate.	
<b>Chief Executive's Response</b>	
There are currently 50 identified Rural Nodes within the Draft Plan to cater for rural generated housing need. These Rural Nodes have a strong residential focus and are based on a small number of individual houses. They provide an alternative to one-off housing in the countryside through the consolidation of rural residential development within existing small settlements. It is envisaged that for the most part, they will provide an opportunity for family members of existing households within the Node to build a new home, or reuse and adapt an existing structure, in proximity to their family home, by subdividing large sites.	
This submission along with many others requests the extension of individual Rural Nodes. Extending rural nodes on an ad hoc basis would represent a piecemeal uncoordinated approach for designating land for which there is no evidence-based need.	

The quantum and location of land identified for development in the County is directly influenced by the Development Plan's Settlement and Core Strategy. Based on the evidence-based approach adopted in the Core Strategy for the County, it is clear, that Meath has a significant and sufficient quantum of land designated to meet the regional targets for the Development Plan period.

Lands are designated in rural villages and rural nodes to accommodate local rural based housing need across the County. In this instance it is considered that the area of land already designated in Bohermeen contains is sufficient to support rural-generated dwellings for members of the rural community of Bohermeen. Rural Housing Needs can also be accommodated in the neighbouring Rural Nodes of Boyerstown, Cortown and Rathmore. It is noteworthy also, that there is significant provision available for additional housing in Navan.

In conclusion, there is no evidence-based need or planning rationale for the extension of this Rural Nodes which would be in breach of the Core Strategy of the Draft Plan and the Regional Spatial and Economic Strategy and as such would be contrary to proper planning and sustainable development.

#### **Chief Executive's Recommendation**

No change recommended.

<b>Submission No.(s):</b>	MH-C5-117
<b>Submission by:</b>	Fiona Smith
<b>Submission Theme(s):</b>	Chapter 9 Rural Development Strategy and Chapter 3 Settlement Strategy
<b>Summary of Submission:</b>	
<ul style="list-style-type: none"> <li>• This submission requests that 1.7ha of land outside Dunderry Rural Node is zoned A2 new residential for residential and community use.</li> <li>• A strategic argument is put forward for the zoning of the subject lands including the location of the lands along the L4008 as a gateway to Dunderry,</li> <li>• An indicative layout is put forward. However, it is stated that the design would be resolved in consultation with the LA to ensure high quality of design</li> <li>• The landowners are willing to discuss other suitable uses that Council may considered appropriate.</li> <li>• If new residential is approved, affordable housing and or sites would be made available as part of the development.</li> </ul>	
<b>Chief Executive's Response</b>	
<p>There are currently 50 identified Rural Nodes within the Draft Plan to cater for rural generated housing need. These Rural Nodes have a strong residential focus and are based on a small number of individual houses. They provide an alternative to one-off housing in the countryside through the consolidation of rural residential development within existing small settlements. It is envisaged that for the most part, they will provide an opportunity for family members of existing</p>	

households within the Node to build a new home, or reuse and adapt an existing structure, in proximity to their family home, by subdividing large sites.

This submission proposes zoning lands outside Dunderry Rural Node for residential purposes. Extending rural nodes on an ad hoc basis would represent a piecemeal uncoordinated approach for designating land for which there is no evidence-based need.

The quantum and location of land identified for development in the County is directly influenced by the Development Plan's Settlement and Core Strategy. Based on the evidence-based approach adopted in the Core Strategy for the County, it is clear, that Meath has a significant and sufficient quantum of land designated to meet the regional targets for the Development Plan period.

There are lands designated in rural villages and rural nodes to accommodate local rural based housing need across the County. In this instance it is considered that the area of land already designated in Dunderry contains sufficient lands to support rural-generated dwellings for members of the rural community of Dunderry. Furthermore, the close by Nodes at Kilbride and Robinstown also makes provision in this regard.

In addition, the proposed indicative layout is suburban in style, at variance with the rural character of the area and would encroachment onto and loss of valuable agricultural and lands.

In conclusion, there is no evidence-based need or planning rationale for zoning lands at Dunderry and as such the proposed development would be contrary to proper planning and sustainable development.

#### **Chief Executive's Recommendation**

No change recommended.

<b>Submission No:</b>	MH-C5-118
<b>Submitted by:</b>	McKenna & Associates on behalf of Joenna Caffrey
<b>Submission Theme(s):</b>	Land Use Zones, Glebe Batterstown , Chapter 9 Rural Development Strategy.
<b>Summary of Submissions:</b>	
This submission seeks the rezoning of existing unzoned lands at Batterstown to A2 New Residential.	
The zoning will involve a change of the town boundary to include the site along the R154. This is a gateway location to Batterstown which would be suitable for residential or ancillary community facilities. The zoning will protect the amenity of the existing neighbouring dwellings in the area.	
<b>Chief Executive's Response</b>	
There are currently 50 identified Rural Nodes within the Draft Plan to cater for rural generated housing need. These Rural Nodes have a strong residential focus and are based on a small number of individual houses. They provide an alternative to one-off housing in the countryside through the consolidation of rural residential development within existing small settlements. It is envisaged that for the most part, they will provide an opportunity for family members of existing households within the Node to build a new home, or reuse and adapt an existing structure, in proximity to their family home, by subdividing large sites.	

This submission along with many others requests extending the boundaries of Rural Nodes. Extending rural nodes on an ad hoc basis would represent a piecemeal uncoordinated approach for designating land for which there is no evidence-based need.

The quantum and location of land identified for development in the County is directly influenced by the Development Plan's Settlement and Core Strategy. Based on the evidence-based approach adopted in the Core Strategy for the County, it is clear, that Meath has a significant and sufficient quantum of land designated to meet the regional targets for the Development Plan period.

There are lands designated in rural villages and rural nodes to accommodate local rural based housing need across the County. In this instance it is considered that the area of land already designated in Batterstown contains sufficient lands to support rural-generated dwellings for members of the rural community of Batterstown.

#### **Chief Executive's Recommendation**

No change recommended.

<b>Submission No:</b>	MH-C5-121
<b>Submitted by:</b>	McKenna & Associates on behalf of Michael Murtagh
<b>Submission Theme(s):</b>	Bohermeen – Rural Node Extension Request, Chapter 9 Rural Development Strategy.
<b>Summary of Submissions:</b>	
<p>This submission seeks the zoning of existing un-zoned lands at Bohermeen to A2 New Residential.</p> <p>It is submitted that the potential new houses will provide much needed support and members to the existing facilities. The site is close to Bohermeen to take advantage of existing services.</p> <p>The zoning will involve a change of the town boundary to include the site situated at a crossroad.</p> <p>It is submitted;</p> <ul style="list-style-type: none"> <li>• The current Bohermeen Village should logically extent to include the subject site;</li> <li>• The scale and density of development of development would be low rise / low density and appropriate to an edge of village location;</li> <li>• Zoning the lands to residential would ensure that the amenity of the existing neighbouring dwellings is protected;</li> <li>• The landowner is willing to discuss other suitable uses the Council may see fit for this prominent site;</li> <li>• A developed project will use preproperate sustainable technologies;</li> <li>• The subject site is adjacent to all services in Bohermeen; and</li> <li>• If the new residential zoning is approved, affordable houses and/or sites would be made available as part of any development.</li> </ul>	
<b>Chief Executive's Response</b>	
<p>The majority of rural nodes comprise largely of unserved rural areas with limited social and community infrastructure. Rural nodes are designated for limited development at a sustainable</p>	

scale for immediate local need through the development of clusters.

In this context, it is considered that rural nodes can only facilitate a small population from their current population base over the period of the plan.

#### **Chief Executive's Recommendation**

No change recommended.

<b>Submission No.:</b>	MH-C5-123
<b>Submitted by:</b>	Fingal Planning Consultants on behalf of Seamus Murphy.
<b>Submission Theme(s):</b>	Extractive Industries - Murphy's Quarry (Gormanston), Chapter 9 Rural Development Strategy.

#### **Summary of Submission:**

This submission seeks the rezoning of lands at Murphy's Quarry, Sarsfieldstown, Gormanston.

The submission is provided in order to amend the zoning of lands for objective E2.

The subject lands are part of an overall quarry owned by Mr Seamus Murphy. The lands comprise circa 125 acres and has been active since the 1970s.

The Environmental Protection Agency (EPA) issued a Waste Licence 151-1 for the site in June 2003. The licence is for the operation of an inert landfill to facilitate the orderly restoration of the sand and gravel pit and allows for the acceptance of a maximum of 750,000 tonnes of inert construction and demolition waste p.a.

The site is located north of Gormanston village adjacent to the N1 road. The lands are strategically located close to the M1 motorway interchange. The M1 is vital for the continued growth of the north/south economic corridor. The site is located on a strategic interchange of the north/south economic corridor and therefore has a vital role to play in the economic success of the corridor.

Services are readily available.

#### **Reasons to rezone the site;**

- Facilitate future plans to create an integrated waste management facility and associated developments;
- Excellent road infrastructure close to the M1 motorway, interchange to cover a catchment area of Meath;
- There is a proposal to develop a world class deep-water port, logistics centre and business park in Gormanston;
- Promotes the further development of industry and employment locally;
- There are no lands currently zoned E2 in the Gormanston area of East Meath;
- This would allow for orderly development of these lands;
- There are minimal numbers of residents adjacent to the site;
- Lands have no agricultural value;
- Limited existing industry and employment generating uses in this area;
- Provide local employment for local people;

- Sustainable future development of East Meath; and
- The landowner proposes to provide a 2-acre site for a recycling centre and a 2-acre site for a compound / yard for MCC within these lands.

#### **Chief Executive's Response**

The Council acknowledges the need for extractive industries in terms of supply of aggregate materials for the construction sector, delivering transport infrastructure and the export market. The wide distribution of resources is recognised and known deposits and sites were mapped by the Geological Survey of Ireland (GSI) in 2004 and updated in 2014. The GSI aggregate potential mapping illustrates potential crushed rock and gravel deposits and assess the interactions between the development of these resources and certain land uses such as bore holes and events such as landslides.

The Council has undertaken an examination of quarries within its administrative area in accordance with section 261A of the Planning & Development Act 2000, as amended to determine whether development was carried out which would have required EIA or AA having regard to the EIA Directive and Habitats Directive.

It is the Council's policy (RUR POL 37) to facilitate adequate supplies of aggregate resources to meet the future growth needs of the County and the wider region while addressing key environmental, traffic and social impacts and details of rehabilitation.

It is also the Council's policy (RUR POL 43) to ensure that all existing workings are rehabilitated to suitable land uses and that all future extraction activities allow for rehabilitation of pits and proper land use management. The biodiversity value of the site should be considered in the first instance when preparing restoration plans. Where land filling is proposed, inert material is the preferred method. Each planning application shall be considered on a case by case basis and where relevant will be dealt with under the relevant regional Waste Management Plan.

While it is accepted that the subject site is long established for quarry related activities and potential lands have been identified for expansion as indicated on the site location map. As per the land use zoning objective for the site which is within the Rural Area (RA) such uses (Extractive Industries) are considered to be appropriate in the RA. In this context, it is therefore not considered necessary to zone the site for E2. The RA land use zoning objective is also considered to be the most appropriate given the site's countryside location as it seeks to protect and promote the value and future sustainability of rural areas.

#### **Chief Executive's Recommendation**

No change recommended.

<b>Submission No.:</b>	MH-C5-132
<b>Submitted by:</b>	Ballinlough GFC
<b>Submission Theme(s):</b>	Chapter 9 Rural Development Strategy
<b>Summary of Submission:</b>	
This submission raises a number of concerns in relation to Section 9 -Rural Development Strategy. The following issues are highlighted in this regard:	
<ul style="list-style-type: none"> <li>• Future generations will be prevented from building a home on their family land and living</li> </ul>	

in the rural area in which they have lived all their lives.

- Lack of rural nodes in the locality. The rural nodes within the parish of Ballinlough and Kilskyre cover land which is largely already developed upon, with the remainder owned by a small number of individuals. Our third village, Crossakiel is not included as a rural node at all. In addition, a number of neighbouring villages including Carnaross, Moynalty, Kilmainhamwood, Kilmainham, Nobber, Carlanstown, Drumcondra, Gibstown, Rathcairn, Kilmessan, Kildalkey are also not included.
- The creation of these limited rural nodes will lead to large scale inflation in site prices in rural areas.
- Impact on the future for local GAA clubs, schools and the whole fabric of life in Rural Meath.
- The current proposals discriminate against non-agricultural families who wish to remain living in rural Meath. I believe the long-term impacts will be harmful for all rural communities and will lead to severe problems in years to come.
- It removes the only viable option open to a large population of rural Meath of ever owning their own family home.
- Future housing will not have a detrimental effect on the rural environment given environmental standards.

#### **Chief Executive's Response**

Please refer to CE's response to grouped rural housing policy themed submissions. i.e. Part 3 of Report, specifically grouped themed submission no. 1.

#### **Chief Executive's Recommendation**

No change recommended.

<b>Submission No's.:</b>	MH-C5-140
<b>Submission by:</b>	Colm Smith
<b>Submission Theme(s):</b>	Chapter 9 Rural Development Strategy
<b>Summary of Submission:</b>	
This submission refers to the Rural Housing Policy and the Rural Node Policy.	
In terms of the rural housing policy the following issues are raised:	
<ul style="list-style-type: none"> <li>• The proposed policy does not sufficiently recognise the need of older persons whose family or medical circumstances have changed.</li> <li>• The Development Plan should promote the downsizing of properties by facilitating persons who may wish to downsize yet continue to reside within their existing neighbourhood.</li> <li>• The following policy is put forward in this regard 'Where an applicant has resided in a rural area in excess of the previous 15 consecutive years, and the dwelling house is being sold to facilitate the construction of a dwelling more suited to the applicants housing needs, such applications will be considered on their individual merits in both rural areas, where the applicant satisfied the local housing need criteria'</li> </ul>	



In terms of Rural Nodes, the following comments are made:

- No detail is provided as to how the area of the nodes has been determined.
- The boundaries of Fordstown Node should be revised to include lands along the N51 or the Bohermeen/Moyaugh road. (A map of the relevant lands accompanies the submission).

#### **Chief Executive's Response**

Please refer to Part 3 of Report which refers to 'Grouped Themed Submissions', specifically grouped themed submission no. 1 'Rural Housing Policy'.

In relation to Rural Nodes, there are currently 50 identified Rural Nodes within the Draft Plan to cater for rural generated housing need. These Rural Nodes are generally selected in rural areas that have a strong residential and or community focus. They provide an alternative to one-off housing in the countryside through the consolidation of rural residential development within existing small settlements. It is envisaged that for the most part, they will provide an opportunity for family members of existing households within the Node to build a new home, or reuse and adapt an existing structure, in proximity to their family home, by subdividing large sites.

This submission along with many others requests the extension of individual Rural Nodes. Extending rural nodes on an ad hoc basis would represent a piecemeal uncoordinated approach for designating land for which there is no evidence-based need.

The quantum and location of land identified for development in the County is directly influenced by the Development Plan's Settlement and Core Strategy. Based on the evidence-based approach adopted in the Core Strategy for the County, it is clear, that Meath has a significant and sufficient quantum of land designated to meet the regional targets for the Development Plan period.

Lands are designated in rural villages and rural nodes to accommodate local rural based housing need across the County. In this instance it is considered that the area of land already designated in Fordstown contains is sufficient to support rural-generated dwellings for members of the rural community of Fordstown. Rural Housing Needs can also be accommodated in the neighbouring Rural Nodes of Cortown and Rathmore.

In conclusion, there is no evidence-based need or planning rationale for the extension of rural nodes which would be in breach of the Core Strategy of the Draft Plan and the Regional Spatial and Economic Strategy and as such would be contrary to proper planning and sustainable development

#### **Chief Executive's Recommendation**

No change recommended.

<b>Submission No.:</b>	MH-C5-165
<b>Submitted by:</b>	Duncan Dalrymple

<b>Submission Theme(s):</b>	Chapter 9 Rural Development Strategy
<b>Summary of Submission:</b>	
<ul style="list-style-type: none"> <li>• This submission requests that the rural node of Curraghera be extended to assist children of the locality outside the Node to obtain a site.</li> <li>• It is submitted that Curraghera is well serviced having a chapel, graveyard, primary school, shop and public house with large foods and Tayto Park in the vicinity at present.</li> <li>• It is requested that due to wayleaves and the small areas that can be developed that the Council be generous in their extension in the area to include lands in his ownership towards Tayto Park.</li> <li>• A map is included which illustrates the relevant lands.</li> </ul>	
<b>Chief Executive's Response</b>	
<p>There are currently 50 identified Rural Nodes within the Draft Plan to cater for rural generated housing need. These Rural Nodes have a strong residential focus and are based on a small number of individual houses. They provide an alternative to one-off housing in the countryside through the consolidation of rural residential development within existing small settlements. It is envisaged that for the most part, they will provide an opportunity for family members of existing households within the Node to build a new home, or reuse and adapt an existing structure, in proximity to their family home, by subdividing large sites.</p> <p>This submission along with many others requests the extension of individual Rural Nodes. Extending rural nodes on an ad hoc basis would represent a piecemeal uncoordinated approach for designating land for which there is no evidence-based need.</p> <p>The quantum and location of land identified for development in the County is directly influenced by the Development Plan's Settlement and Core Strategy. Based on the evidence-based approach adopted in the Core Strategy for the County, it is clear, that Meath has a significant and sufficient quantum of land designated to meet the regional targets for the Development Plan period.</p> <p>Lands are designated in rural villages and rural nodes to accommodate local rural based housing need across the County. In this instance it is considered that the area of land already designated in Curraghera is sufficient to support rural-generated dwellings for members of the rural community of the area. Furthermore, lands are designated at Cushenstown Rural Node which can also cater for local rural housing need and significant provision for housing is also available within the adjoining larger urban settlements of Ashbourne and Ratoath.</p> <p>In conclusion, there is no evidence-based need or planning rationale for the extension of this Rural Node which would be in breach of the Core Strategy of the Draft Plan and the Regional Spatial and Economic Strategy and as such would be contrary to proper planning and sustainable development.</p>	
<b>Chief Executive's Recommendation</b>	
No change recommended.	

<b>Submission No:</b>	MH-C5-211
<b>Submitted by:</b>	Sean Boyle on behalf of the Sheridan Family

<b>Submission Theme(s):</b>	Bohermeen – Rural Node Extension Request, Chapter 9 Rural Development Strategy.
<b>Summary of Submissions:</b>	
<p>This submission relates to lands approximately 100m NW of Bohermeen National School and while other residences in particular two storey farm houses exist on the roadside the road is bounded by a mature hedge.</p> <p>The subject site previously had permission under NA/103141 and NA/800418. This was for the construction of 11 no dormer dwellings and 1 detached domestic garage with 2 storey public house, shop and petrol filling station.</p> <p>It is proposed that the rural node limit for Bohermeen be extended to include the subject site as seen below.</p>	
<b>Chief Executive's Response</b>	
<p>The majority of rural nodes comprise largely of unserved rural areas with limited social and community infrastructure. Rural nodes are designated for limited development at a sustainable scale for immediate local need through the development of clusters.</p> <p>In this context, it is considered that rural nodes can only facilitate a small population from their current population base over the period of the plan.</p>	
<b>Chief Executive's Recommendation</b>	
No change recommended.	

<b>Submission No.(s):</b>	MH-C5-340
<b>Submission by:</b>	Scoil Ultain Naofa Baile Ghib
<b>Submission Theme(s):</b>	Chapter 9 Rural Development Strategy
<b>Summary of Submission:</b>	
<p>We would like to oppose the proposed Rural Development Plan by Meath County Council. As a Gaeltacht we want the Gaeltacht community to be able to build houses in the area and to have their children sent to Sacred Ultain School. If the County Council continues this will significantly reduce the number of people living in the parish and of course the number of children in the school. We currently have a Gaeltacht plan to strengthen the language and this plan is doing otherwise. We hope that the Council will not continue this.</p>	
<b>Chief Executive's Response</b>	
Please refer to part 3 of Report, specifically Grouped Themed Submission no. 1 Rural Housing Policy.	
<b>Chief Executive's Recommendation</b>	
No change recommended.	

<b>Submission No.(s):</b>	MH-C5-343
<b>Submission by:</b>	Mícheál Ó Gallachóir
<b>Submission Theme(s):</b>	Chapter 9 Rural Development Strategy and Volume 2 Drumcondrath Written Statement
<b>Summary of Submission:</b>	

### 1. Rural Housing Policy

- Planning should be extended to allow people who were reared in a Parish to be allowed build anywhere within that parish, provided they meet the normal building requirements.
- People with professions other than those working in the agri-sector should not be excluded from obtaining from planning in rural areas. They are essential to rural communities survival.

### 2. Volume 2 Drumcondrath

- Submission requests the provision of a playground in Drumcondrath. A playground at the community centre would encourage more people into the village while also be a huge benefit the health of young people.
- Submission highlights the need for the extension of the footpath on Birdhill to the football pitch.
- A safer crossing section at the village at Muldoon's shops is recommended as it would join up the faculties and allow pedestrians cross safely from the proposed playground and the football pitch.

### 3. Volume 2 Baile Ghib (Gibbstown) and An Ghaeltacht

- Submission requests that Meath County Council be entrusted to ensure that people buying houses in the two Gaeltacht areas have a fluency in Irish that will ensure the survival of the areas as Irish speaking areas.

## **Chief Executive's Response**

1. In terms of item no. 1, please refer to grouped themed submissions outlined in Part 3 of Report, specifically grouped themed submission no. 1 'Rural Housing Policy'.

2. With regard to the provision of a playground in Drumcondrath, it is noted that a playground is being provided in the GAA grounds through Leader Programme funding. This is considered adequate to meet the needs of the village in this regard.

There is merit in this proposal. However, Road improvements, upgrades, realignments, repairs, traffic management measures, traffic calming and improvements to road signage across the county are assessed and implemented as deemed necessary, as resources allow and subject to availability. The provision of footpaths around recreational facilities is considered to be adequately covered in the Draft Plan under MOV POL 20 which states; *'To encourage, where appropriate, the incorporation of safe and efficient cycleways, accessible footpaths and pedestrian routes into the design schemes for town centres/neighbourhood centres, residential, educational, employment, recreational developments and other uses.'*

Proposals to support the upgrade the crossing at Muldoon's Shop is adequately addressed under DRUM OBJ 10: To provide public realm improvements to include traffic calming and pedestrian priority on the Main Street.

3. Section 9.10.2, in particular RUR POLs 45- 48 and RUR OBJ 43, provide sufficient and appropriate protection of the linguistic and cultural heritage of the Gaeltacht including the promotion of Irish as the community language. The wording of the existing policies and objectives are considered adequate in this regard.

<b>Chief Executive's Recommendation</b>	
No change recommended.	

<b>Submission No.(s):</b>	MH-C5-383
<b>Submission by:</b>	Paul Mathews
<b>Submission Theme(s):</b>	Chapter 9 Rural Development Strategy

**Summary of Submission:**

- This submission refers to lands adjacent to Monknewtown Node.
- It is requested that the node be extended to include the lands to the south.
- The inclusion of these lands would demonstrate sustainable planning / development and a sensible integration of future development within the node.
- It is proposed that the subject lands be allocated for a number of rural one-off houses subject to Local Need Criteria.
- The land could also facilitate sustainable Cluster Housing Schemes that would be designed to respect the local area.

**Chief Executive's Response**

There are currently 50 identified Rural Nodes within the Draft Plan to cater for rural generated housing need. These Rural Nodes have a strong residential focus and are based on a small number of individual houses. They provide an alternative to one-off housing in the countryside through the consolidation of rural residential development within existing small settlements. It is envisaged that for the most part, they will provide an opportunity for family members of existing households within the Node to build a new home, or reuse and adapt an existing structure, in proximity to their family home, by subdividing large sites.

This submission along with others requests extending the boundaries of individual Rural Nodes. designation of an extension to Rural Nodes. Extending rural nodes on an ad hoc basis would represent a piecemeal uncoordinated approach for designating land for which there is no evidence-based need.

The quantum and location of land identified for development in the County is directly influenced by the Development Plan's Settlement and Core Strategy. Based on the evidence-based approach adopted in the Core Strategy for the County, it is clear, that Meath has a significant and sufficient quantum of land designated to meet the regional targets for the Development Plan period.

There are lands designated in rural villages and rural nodes to accommodate local rural based housing need across the County. In this instance it is considered that the area of land already designated in Monknewtown contains sufficient lands to support rural-generated dwellings for members of the rural community of Monkstown. It is noteworthy also, that there is also significant provision available within the adjoining larger urban settlements of Slane and Drogheda.

In conclusion, there is no evidence-based need or planning rationale for the extension of the rural node which would be in breach of the Core Strategy of the Draft Plan and the Regional Spatial and Economic Strategy and as such would be contrary to proper planning and sustainable development.

<b>Chief Executive's Recommendation</b>
No change recommended.

<b>Submission No.(s):</b>	MH-C5-385
<b>Submission by:</b>	Cllr. Paul McCabe
<b>Submission Theme(s):</b>	Chapter 9 Rural Development Strategy

**Summary of Submission:**

- This submission requests that both Maio and Ughtyneill be considered as rural nodes similar to Newcastle.

**Chief Executive's Response**

There are currently 50 identified Rural Nodes within the Draft Plan to cater for rural generated housing need. These Rural Nodes have a strong residential focus and are based on a small number of individual houses. They provide an alternative to one-off housing in the countryside through the consolidation of rural residential development within existing small settlements. It is envisaged that for the most part, they will provide an opportunity for family members of existing households within the Node to build a new home, or reuse and adapt an existing structure, in proximity to their family home, by subdividing large sites.

This submission along with others requests the designation of an additional Rural Nodes. The designation of additional Rural Nodes within the County would represent a piecemeal uncoordinated approach for designating land for which there is no evidence-based need.

The quantum and location of land identified for development in the County is directly influenced by the Development Plan's Settlement and Core Strategy. Based on the evidence-based approach adopted in the Core Strategy for the County, it is clear, that Meath has a significant and sufficient quantum of land designated to meet the regional targets for the Development Plan period.

There are lands designated in rural villages and rural nodes that are sufficient in area to accommodate local rural based housing need across the County. In this instance the close-by existing designated rural nodes at Kilbeg and Newcastle are adequate in area to accommodate local rural based housing need. There is also provision available within the adjoining rural villages such as Kilmainhamwood, Moynalty at and the larger urban settlement of Kells.

Furthermore, designating additional rural nodes would result in a development pattern with deficiencies in terms of the provision of basic infrastructure and public services, in addition to unsustainable travel patterns, encroachment onto and loss of valuable agricultural and adverse visual impact.

In conclusion, there is no evidence-based need or planning rationale for the designation of new rural nodes which would be in breach of the Core Strategy of the Draft Plan and the Regional Spatial and Economic Strategy and as such would be contrary to proper planning and sustainable development.

**Chief Executive's Recommendation**

No change recommended.

<b>Submission No.:</b>	MH-C5-397
<b>Submitted by:</b>	Kilsaran Concrete-(Irish Concrete Federation (ICF))
<b>Submission Theme(s):</b>	Extractive Industries , Chapter 9 Rural Development Strategy.
<b>Summary of Submission:</b>	
<p>The Irish Concrete Federation (ICF) is the national representative body for the Irish aggregates and concrete products industry.</p> <p><b>Essential Points;</b></p> <ol style="list-style-type: none"> <li>1) Ireland has abundant natural reserves of high-quality aggregates (stone, sand and gravel);</li> <li>2) These aggregates are the essential raw materials from which Irelands future infrastructure will be built, including our homes, offices, schools, hospitals and transport network;</li> <li>3) Aggregates can only be accessed where they occur. Currently there are approximately 500 large commercial quarries extracting aggregates throughout Ireland;</li> <li>4) The supply of local aggregates is essential to the sustainable development of Irish communities local supplies of raw materials reduce transport distances, thereby reducing their carbon footprint compared to non-local sources;</li> <li>5) Current demand for aggregates in Ireland at 12 tonnes per capita is twice the average demand in the EU 28. Project Ireland 2040 will necessitate the production of approx. 1.5 billion tonnes of aggregates;</li> <li>6) Scarcities of some particular aggregate products are already emerging in the eastern and midland regions. Therefore, the future supply of aggregates needs to be planned, monitored and managed in a sustainable manner;</li> <li>7) In recognition of the strategically essential role of aggregates, Ireland needs a national aggregate planning policy to underpin the local and regional planning policy;</li> <li>8) To provide the country's future development, Irelands strategic reserves of aggregates need to be identified, quantified and protected</li> <li>9) A robust, effective and efficient planning system for quarries is necessary to ensure that the extraction of Irelands aggregate reserve is enabled in a sustainable manner. Currently the average decision-making timeframe for quarry applications is 76 weeks with some decisions taking in excess of 2 years;</li> <li>10) The states planning enforcement and procurement functions must ensure that only authorised operators are entitled to supply the marketplace.</li> </ol> <p>ICF recommends the following proactive steps are taken by Government and other stakeholder organisations to ensure that future demand for aggregates can be supplied;</p> <ol style="list-style-type: none"> <li>1) <b>National Aggregates Planning Policy:</b> National policy makers must recognise that supply of aggregates cannot be assumed and must be planned, monitored and managed to ensure that future demand can be supplied.</li> <li>2) <b>Identification and Protection of Aggregates Reserves:</b> drawing from the national policy, the three regional assemblies and individual local authorities should, as part of their development planning have regard to and make provision for the protection of strategic aggregates resources.</li> <li>3) <b>Decision making timeframes:</b> The EIA regulations transposing the EIA Directive require that a meaningful scoping process is undertaken prior to submission of development applications.</li> </ol>	



- 4) **Direct applications to An Bord Pleanála:** As practically all decisions by local authorities in respect of large scale extractive applications are applied to ABP.
- 5) **Quarry Planning Permission Durations:** given the highly capital-intensive nature of the extractive industry in terms of plant, equipment, site infrastructure, landscaping and mitigation measures, the regulator certainty needed for professional operations can only be provided by granting of permissions of long-term durations commensurate with the planned extraction of resources often exceeding 30 years.
- 6) **Sufficient planning authorisations:** the planning system should ensure steady and adequate provision of aggregate supplies within the context of a supportive national policy.
- 7) **Enforcement:** Government must actively promote a strong consistent commitment to enforcement by planning authorities of planning legislation to protect and enhance the natural environment.
- 8) **Public procurement:** a policy of procuring materials only from authorised sources by the state and local authorities is essential to protect the environment and support compliant businesses.
- 9) **Recycling of aggregates:** Government should adopt national and end of waste criteria to facilitate the processing and reuse of recycled aggregates in the construction chain within a supportive planning framework.

#### **Chief Executive's Response**

The Council acknowledges the need for extractive industries in terms of supply of aggregate materials for the construction sector, delivering transport infrastructure and the export market. The wide distribution of resources is recognised, and known deposits and sites were mapped by the Geological Survey of Ireland (GSI) in 2004 and updated in 2014. The GSI aggregate potential mapping illustrates potential crushed rock and gravel deposits and assess the interactions between the development of these resources and certain land uses such as bore holes and events such as landslides.

The Council has undertaken an examination of quarries within its administrative area in accordance with section 261A of the Planning & Development Act 2000, as amended to determine whether development was carried out which would have required EIA or AA having regard to the EIA Directive and Habitats Directive.

It is the Council's policy (RUR POL 37) to facilitate adequate supplies of aggregate resources to meet the future growth needs of the County and the wider region while addressing key environmental, traffic and social impacts and details of rehabilitation.

It is also the Council's policy (RUR POL 43) to ensure that all existing workings are rehabilitated to suitable land uses and that all future extraction activities allow for rehabilitation of pits and proper land use management. The biodiversity value of the site should be considered in the first instance when preparing restoration plans. Where land filling is proposed, inert material is the preferred method. Each planning application shall be considered on a case by case basis and where relevant will be dealt with under the relevant regional Waste Management Plan.

#### **Chief Executive's Recommendation**

No Change recommended

<b>Submission No.(s):</b>	MH-C5-404
<b>Submission by:</b>	Bernadette Everitt

<b>Submission Theme(s):</b>	Chapter 9 Rural Development Strategy
<b>Summary of Submission:</b>	
<ul style="list-style-type: none"> <li>• This submission refers to Culmullin Node.</li> <li>• It is considered that the proposed amount of land included in the rural node is excessive and unwarranted having regard to the existing size of Culmullin.</li> <li>• Furthermore, it is noted that Culmullin does not form part of the settlement hierarchy of the county and the inclusion of these additional lands as part of the rural node is regarded as inconsistent with the hierarchy policy of promoting growth in larger established villages, and towns where services can cater and accommodate sustainable growth.</li> <li>• The submission requests that Culmullin Rural Node boundary be revised, reduced and treated with consistency with particular reference to the neighbouring Rural Nodes of <i>Kiltale, Drumree, Batterstown and Moynalvy</i>.</li> <li>• A revised boundary line is proposed which reduces the extent of the Node designation to include 48 acres/19.5 hectares.</li> </ul>	
<b>Chief Executive's Response</b>	
<p>The issues raised in this submission are noted and accepted. Having re-examined the quantum of land included within the boundary of Culmullin Node, the Council are of the view that if all the lands were developed it could potentially adversely impact upon the rural character of the area and compete with adjoining villages in terms of the role they serve. It is proposed to amend the boundary with a view to clustering the Node on the road junction at St Martin of Tours church; the adjoining cemetery and Culmullin National School whilst acknowledging the speed limit approaching the settlement. Infill residential is provided for to the immediate north of the settlement and new development to the east and west.</p>	
<b>Chief Executive's Recommendation</b>	
<p>Reduce the boundary of Culmullin Rural Node as follows:</p> <p>Map no 1 (Boundary as per the Draft Plan)</p>	



Map no. 2 Revised Boundary proposed as per CE Recommendation



<b>Submission No.(s):</b>	MH-C5-413
<b>Submission by:</b>	Patrick Smith
<b>Submission Theme(s):</b>	Chapter 9 Rural Development Strategy

#### **Summary of Submission:**

- The submission author is a resident of Ballinlough and has children who wish to live in the area in the future.
- This submission requests that the boundary of Ballinlough Node be extended to include 3 additional parcels of land to the north and west.
- It is submitted that the current zoned area included for the Ballinlough rural node is extremely limited and will allow for negligible additional development area.

#### **Chief Executive's Response**

There are currently 50 identified Rural Nodes within the Draft Plan to cater for rural generated housing need. These Rural Nodes have a strong residential focus and are based on a small number of individual houses. They provide an alternative to one-off housing in the countryside through the consolidation of rural residential development within existing small settlements. It is envisaged that for the most part, they will provide an opportunity for family members of existing households within the Node to build a new home, or reuse and adapt an existing structure, in proximity to their family home, by subdividing large sites.

This submission along with others requests the designation of an extension to Rural Nodes. Extending rural nodes on an ad hoc basis would represent a piecemeal uncoordinated approach for designating land for which there is no evidence-based need.

The quantum and location of land identified for development in the County is directly influenced by the Development Plan's Settlement and Core Strategy. Based on the evidence-based approach adopted in the Core Strategy for the County, it is clear, that Meath has a significant and sufficient quantum of land designated to meet the regional targets for the Development Plan period.

There are lands designated in rural villages and rural nodes to accommodate local rural based housing need across the County. In this instance it is considered that the area of land already designated in Ballinlough contains sufficient lands to support rural-generated dwellings for members of the rural community of Ballinlough. Furthermore the close by Nodes at Drumbaragh and Kilskeer as well as the village of Crossakiel also makes provision in this regard.

Furthermore, designating additional rural nodes would result in a development pattern with deficiencies in terms of the provision of basic infrastructure and public services, in addition to unsustainable travel patterns and encroachment onto and loss of valuable agricultural and lands.

In conclusion, there is no evidence-based need or planning rationale for the extension of this Rural Nodes and as such would be contrary to proper planning and sustainable development.

#### Chief Executive's Recommendation

No change recommended.

<b>Submission No.(s):</b>	MH-C5-446
<b>Submission by:</b>	GK
<b>Submission Theme(s):</b>	Chapter 9 Rural Development Strategy
<b>Summary of Submission:</b>	
<ol style="list-style-type: none"> <li>1. This submission states that the occupancy conditions in rural areas should be increased from 7 to 30 years.</li> <li>2. It refers to a number of Rural Objectives and requests the following amendments: <ul style="list-style-type: none"> <li>• <i>RUR OBJ 19 – ‘remove as this “provision of childcare facilities” promotes birth parents not to raise their children but strangers to do the job for them. This is another form of industrial schools in Ireland.’</i></li> <li>• <i>RUR OBJ 26 – ‘remove as this “promoting clachan tradition” as this promotes the increase in housing clusters which is similar to that of housing estates. This is rural and not Hamlets.’</i></li> <li>• <i>RUR OBJ 27 – ‘remove as this “provision of footpaths and public lighting as part of residential development” as this promotes reduction of rural lands which decreases habitats and environments for animals’.</i></li> </ul> </li> </ol>	
<b>Chief Executive's Response</b>	
<ol style="list-style-type: none"> <li>1. In response to item no. 1, the Council is required to attach occupancy conditions in accordance with the Sustainable Rural Housing Guidelines and Circular SP 5/08 issued by the then Department of Environment, Heritage and Local Government A 7 year occupancy condition is attached to all rural dwellings, including those located in Rural</li> </ol>	



<p>Area RA and Rural Node RN zones pursuant to Section 47 of the Planning and Development Act 2000, RUR POL 16 refers. Increasing the occupancy clause to 30 years is considered to be overly restrictive, not practical or appropriate and inconsistent with the approach adopted by neighbouring Local Authorities.</p> <p>2. i) Issues raises in relation to RUR OBJ 19 are not planning related and therefore outside the remit of the development plan.</p> <p>ii) It is not considered that housing clusters or clachan type development is similar to housing estates. Reference is made to clustered type development in the Sustainable Rural Housing Guidelines 2005 as an appropriate form of development in some rural areas.</p> <p>iii) The provision of footpaths and public lighting are necessary physical infrastructure required in Rural Nodes.</p>
<b>Chief Executive's Recommendation</b>
No change recommended.

<b>Submission No.:</b>	MH-C5-473
<b>Submitted by:</b>	James Kieran
<b>Submission Theme(s):</b>	Land Use Zoning – Drumree, Chapter 9 Rural Development Strategy.
<b>Summary of Submission:</b>	
<p>This submission requests the residential rezoning of lands in the village of Drumree.</p> <p>The site adjoins existing zoned land. It is submitted that the site fulfils the criteria for an infill site and development of the site will consolidate the pre-existing residential development in Drumree Village.</p> <p>It is the intention to develop sustainable low-density houses with green areas accessible via a short side road from the cul-de-sac in line with good planning practice.</p>	
<b>Chief Executive's Response</b>	
<p>The majority of rural nodes comprise largely of un-serviced rural areas with limited social and community infrastructure. Rural nodes are designated for limited development at a sustainable scale for immediate local need through the development of clusters. It is anticipated that each rural node can cater for a small population increase from their current population base over the period of the Plan.</p>	
<b>Chief Executive's Recommendation</b>	
No change recommended.	

<b>Submission No.(s):</b>	MH-C5-479
<b>Submission by:</b>	Lorraine Mangan
<b>Submission Theme(s):</b>	Chapter 9 Rural Development Strategy
<b>Summary of Submission:</b>	
<ul style="list-style-type: none"> <li>This submission requests the designation of lands adjacent to Black Bush Golf Club for the purposes of a rural node settlement. These lands shall be made available for qualified local needs applicants and some qualified family members.</li> </ul>	

**Chief Executive's Response**

There are currently 50 identified Rural Nodes within the Draft Plan to cater for rural generated housing need. These Rural Nodes have a strong residential focus and are based on a small number of individual houses. They provide an alternative to one-off housing in the countryside through the consolidation of rural residential development within existing small settlements. It is envisaged that for the most part, they will provide an opportunity for family members of existing households within the Node to build a new home, or reuse and adapt an existing structure, in proximity to their family home, by subdividing large sites.

This submission along with many others requests the designation of an additional Rural Nodes. The designation of additional Rural Nodes within the County would represent a piecemeal uncoordinated approach for designating land for which there is no evidence-based need.

The quantum and location of land identified for development in the County is directly influenced by the Development Plan's Settlement and Core Strategy. Based on the evidence-based approach adopted in the Core Strategy for the County, it is clear, that Meath has a significant and sufficient quantum of land designated to meet the regional targets for the Development Plan period.

The lands designated in rural villages and rural nodes are sufficient in area to accommodate local rural based housing need across the County. In this instance the close-by rural node at Batterstown is adequate in area to accommodate the local rural based housing need in this area. There is also significant provision available within the larger urban settlements at Dunshaughlin and Ratoath.

Furthermore, designating additional rural nodes would result in a development pattern with deficiencies in terms of the provision of basic infrastructure and public services, in addition to unsustainable travel patterns, encroachment onto and loss of valuable agricultural and adverse visual impact.

In conclusion, there is no evidence-based need or planning rationale for the designation of new rural nodes which would be in breach of the Core Strategy of the Draft Plan and the Regional Spatial and Economic Strategy and as such would be contrary to proper planning and sustainable development.

**Chief Executive's Recommendation**

No change recommended.

<b>Submission No.(s):</b>	MH-C5-516
<b>Submission by:</b>	Brian Tallon
<b>Submission Theme(s):</b>	Chapter 9 Rural Development Strategy
<b>Summary of Submission:</b>	
<p>This submission refers to lands in the Submission Writer's ownership at Bellewstown Node. The inclusion of the subject lands in the Node is welcomed. However, the following is highlighted as necessary to facilitate the development of these lands:</p> <ul style="list-style-type: none"><li>• Services to assist the development of this node as a village.</li><li>• The development of the lands for a mix of housing needs, including local needs, private sites and social housing need. It is submitted that the private sites would sub vent the</li></ul>	



cost of the local needs sites and assist in the provision of necessary infrastructure.

- The phasing of development.
- The development of local commercial facilities should be promoted at this location.

An indicative layout in line with the foregoing is included as part of the submission. However, it is outlined as only a proposal at this point.

The submission states that while they agree with the boundaries of the Node, they would facilitate another piece of land outside the boundary for the provision of a sewage treatment plant.

#### **Chief Executive's Response**

Rural nodes are designated primarily for limited infill type development at a sustainable scale through the development of clusters. Consideration of planning applications for development within the nodes must be at an appropriate scale and density with particular care being taken that these settlements do not compete with designated villages in the services they provide or the role and function they play within the rural area. The proposals put forward as part of this submission are suburban in nature, at variance with the existing rural character of the area.

There is a necessity to carefully manage future housing in Rural Nodes. Therefore, new housing in Rural Nodes is reserved for persons who are an intrinsic part of the rural community.

The rural nodes allow for small scale employment opportunities, community facilities and supporting services serving local needs while maintaining the rural nature of the node.

Detailed siting and design guidance including best practice examples and layouts in terms of the development of the rural nodes will be provided in the Meath Rural House Design Guide when reviewed and this will assist perspective applicants in making planning applications in Nodes.

#### **Chief Executive's Recommendation**

No change recommended.

<b>Submission No.(s):</b>	MH-C5-549
<b>Submission by:</b>	Michael McGuinness
<b>Submission Theme(s):</b>	Chapter 9 Rural Development Strategy
<b>Summary of Submission:</b>	
<ul style="list-style-type: none"> <li>• This submission requests the extension of Bellewstown Node to include lands to the north in the submission author's ownership.</li> <li>• It is submitted that the extension of the boundary in such a manner would allow for an opportunity to expand the Node in a sequential, coordinated and structured way and to provide for local development as outlined in Section 9 of the Draft Plan.</li> </ul>	
<b>Chief Executive's Response</b>	
<p>There are currently 50 identified Rural Nodes within the Draft Plan to cater for rural generated housing need. These Rural Nodes have a strong residential focus and are based on a small number of individual houses. They provide an alternative to one-off housing in the countryside through the consolidation of rural residential development within existing small settlements. It is envisaged that for the most part, they will provide an opportunity for family members of existing</p>	

households within the Node to build a new home, or reuse and adapt an existing structure, in proximity to their family home, by subdividing large sites.

This submission along with many others requests the extension of individual Rural Nodes. Extending rural nodes on an ad hoc basis would represent a piecemeal uncoordinated approach for designating land for which there is no evidence-based need.

The quantum and location of land identified for development in the County is directly influenced by the Development Plan's Settlement and Core Strategy. Based on the evidence-based approach adopted in the Core Strategy for the County, it is clear, that Meath has a significant and sufficient quantum of land designated to meet the regional targets for the Development Plan period.

Lands are designated in rural villages and rural nodes to accommodate local rural based housing need across the County. In this instance it is considered that the area of land already designated in Bellewstown is sufficient to support rural-generated dwellings for members of the rural community of Bellewstown. Lands are also identified in close proximity at Ardcath Rural Node and provision is available within the adjoining larger urban settlement of Duleek.

In conclusion, there is no evidence-based need or planning rationale for the extension of this Rural Node which would be in breach of the Core Strategy of the Draft Plan and the Regional Spatial and Economic Strategy and as such would be contrary to proper planning and sustainable development.

#### **Chief Executive's Recommendation**

No change recommended.

<b>Submission No.(s):</b>	MH-C5-570
<b>Submission by:</b>	Sinead Hickey
<b>Submission Theme(s):</b>	Chapter 9 Rural Development Strategy
<b>Summary of Submission:</b>	
<p>This submission highlights the following concerns in relation to the Rural Nodes policy:</p> <ul style="list-style-type: none"> <li>• No obligation on landowner to sell the land.</li> <li>• Cost of sites.</li> <li>• No provision for services and roads and infrastructure in the rural nodes.</li> <li>• Younger generation will be forced out of rural communities with knock on effect on local business, communities, clubs, GAA and schools.</li> <li>• The existing current local housing need criteria is stringent enough.</li> <li>• If the removal of the nodes cannot be achieved the following additional criteria should be added:</li> </ul> <p><i>'If you have lived in the area for 10 of the past 15 years and you can prove this and prove your local ties to the area, that this should be enough to grant Local needs.'</i></p>	
<b>Chief Executive's Response</b>	
Please refer to CE Response to grouped themed 'Rural Housing policy' submissions in Part 3 of Report.	
<b>Chief Executive's Recommendation</b>	

Please refer to CE Recommendation to grouped themed 'Rural Housing Policy' submissions in Part 3 of Report.

<b>Submission No.(s):</b>	MH-C5-572
<b>Submission by:</b>	Syddan GC
<b>Submission Theme(s):</b>	Chapter 9 Rural Development Strategy
<b>Summary of Submission:</b>	
<p>This submission expresses disappointment as to how the locality of Syddan and the surrounding areas are designated under the county development plan, as follows:</p> <ul style="list-style-type: none"> <li>• With no additional lands zoned in the area and the virtual ban on rural housing, the Development Plan policy will stagnate the vibrant community in Syddan, Newtown &amp; Lobinstown and surrounding areas.</li> <li>• The proposed plan will deprive rural communities of growth and lead to continued depopulation.</li> <li>• Younger generations will not have the opportunity to lead clubs, organisations and businesses as they will have to move away from the parish and their elderly parents for housing and this in turn will take all life and growth out of the parish and community.</li> </ul>	
<b>Chief Executive's Response</b>	
Please refer to CE Response to grouped themed 'Rural Housing Policy' submissions in Part 3 of Report.	
<b>Chief Executive's Recommendation</b>	
Please refer to CE Recommendation to grouped themed 'Rural Housing Policy' submissions in Part 3 of Report.	

<b>Submission No.(s):</b>	MH-C5-576
<b>Submission by:</b>	Michael and Mary Lydon
<b>Submission Theme(s):</b>	Chapter 9 Rural Development Strategy
<b>Summary of Submission:</b>	
<p>This submission requests that the Rural Node of Kiltale is extended to include circa. 5 acres located along the R154 public road, (circa 500m from the village).</p> <p>It is submitted that the inclusion of the subject lands which are currently available will aid with the local housing policy as set out under 'Rural Nodes.'</p>	
<b>Chief Executive's Response</b>	
<p>There are currently 50 identified Rural Nodes within the Draft Plan to cater for rural generated housing need. These Rural Nodes have a strong residential focus and are based on a small number of individual houses. They provide an alternative to one-off housing in the countryside through the consolidation of rural residential development within existing small settlements. It is envisaged that for the most part, they will provide an opportunity for family members of existing households within the Node to build a new home, or reuse and adapt an existing structure, in proximity to their family home, by subdividing large sites.</p>	

This submission along with many others requests the extension of individual Rural Nodes. Extending rural nodes on an ad hoc basis would represent a piecemeal uncoordinated approach for designating land for which there is no evidence-based need.

The quantum and location of land identified for development in the County is directly influenced by the Development Plan's Settlement and Core Strategy. Based on the evidence-based approach adopted in the Core Strategy for the County, it is clear, that Meath has a significant and sufficient quantum of land designated to meet the regional targets for the Development Plan period.

Lands are designated in rural villages and rural nodes to accommodate local rural based housing need across the County. In this instance it is considered that the area of land already designated in Kiltale is sufficient in area to support rural-generated dwellings for members of the rural community of Kiltale. Lands are also designated in the nearby rural nodes of Dunsany and Culmullin and significant provision is available within Dunshaughlin.

In conclusion, there is no evidence-based need or planning rationale for the extension of rural nodes which would be in breach of the Core Strategy of the Draft Plan and the Regional Spatial and Economic Strategy and as such would be contrary to proper planning and sustainable development.

#### **Chief Executive's Recommendation**

No change recommended.

<b>Submission No.(s):</b>	MH-C5-605
<b>Submission by:</b>	Brian Darcey
<b>Submission Theme(s):</b>	Chapter 9 Rural Development Strategy
<b>Summary of Submission:</b>	
<ul style="list-style-type: none"> <li>• The submission author and his family are local to Dunderry Village.</li> <li>• This submission requests that the boundaries of Dunderry Node are extended to include additional lands to the south.</li> <li>• It is stated that a portion of land within the village is currently occupied by the GAA club and used as a training pitch and the landowners wish to continue this relationship with the Club.</li> <li>• It is therefore submitted that as this land is not suitable for development that the village boundary be extended southwards to allow for future expansion of the village over the next 6 years.</li> </ul>	
<b>Chief Executive's Response</b>	
<p>There are currently 50 identified Rural Nodes within the Draft Plan to cater for rural generated housing need. These Rural Nodes have a strong residential focus and are based on a small number of individual houses. They provide an alternative to one-off housing in the countryside through the consolidation of rural residential development within existing small settlements. It is envisaged that for the most part, they will provide an opportunity for family members of existing households within the Node to build a new home, or reuse and adapt an existing structure, in proximity to their family home, by subdividing large sites.</p> <p>This submission along with others requests the designation of an extension to a Rural Node.</p>	

Extending rural nodes on an ad hoc basis would represent a piecemeal uncoordinated approach for designating land for which there is no evidence-based need.

The quantum and location of land identified for development in the County is directly influenced by the Development Plan's Settlement and Core Strategy. Based on the evidence-based approach adopted in the Core Strategy for the County, it is clear, that Meath has a significant and sufficient quantum of land designated to meet the regional targets for the Development Plan period.

There are lands designated in rural villages and rural nodes to accommodate local rural based housing need across the County. In this instance it is considered that the area of land already designated in Dunderry contains sufficient lands to support rural-generated dwellings for members of the rural community of Dunderry. Furthermore, the close by Nodes at Kilbride and Robinstown also makes provision in this regard.

Furthermore, designating additional rural nodes would result in a development pattern with deficiencies in terms of the provision of basic infrastructure and public services, in addition to unsustainable travel patterns and encroachment onto and loss of valuable agricultural and lands.

In conclusion, there is no evidence-based need or planning rationale for the extension of this Rural Node and as such would be contrary to proper planning and sustainable development. It is noteworthy however, that a review of the Rural Node policy will be undertaken within two years of the adoption of the Plan as part of the mandatory 2 year report on the progress of the Development Plan under section 15 (2) of the Act.

#### **Chief Executive's Recommendation**

No change recommended.

<b>Submission No.(s):</b>	MH-C5-628
<b>Submission by:</b>	Ronan Balfe on behalf of Pat Farrelly
<b>Submission Theme(s):</b>	Chapter 9 Rural Development Strategy
<b>Summary of Submission:</b>	
<ul style="list-style-type: none"> <li>• This submission refers to Kilskeer Rural Node.</li> <li>• The submission welcomes the introduction of Rural Nodes in the Development Plan and wishes to have additional lands included within Kilskeer Rural Node.</li> <li>• Given the proposal set out in the Draft Development Plan under section 9 - Rural development Strategy and in particular to the new proposals in terms of Local Need, it is submitted that by making these additional land available for inclusion within the Rural Node that it will help protect the status of Kilskeer and will aid in the encouragement of locals connected to the area but that are not involved within the agricultural sector to build their family home in the area where they have family residing.</li> </ul>	
<b>Chief Executive's Response</b>	
<p>There are currently 50 identified Rural Nodes within the Draft Plan to cater for rural generated housing need. These Rural Nodes have a strong residential focus and are based on a small number of individual houses. They provide an alternative to one-off housing in the countryside through the consolidation of rural residential development within existing small settlements. It is envisaged that for the most part, they will provide an opportunity for family members of existing</p>	

households within the Node to build a new home, or reuse and adapt an existing structure, in proximity to their family home, by subdividing large sites.

This submission along with others requests the extension of proposed Rural Nodes. Other submissions have requested the designation of additional Rural Nodes. The extension of Kilskeer Rural Node would represent a piecemeal uncoordinated approach for designating land for which there is no evidence-based need.

The quantum and location of land identified for development in the County is directly influenced by the Development Plan's Settlement and Core Strategy. Based on the evidence-based approach adopted in the Core Strategy for the County, it is clear, that Meath has a significant and sufficient quantum of zoned land to meet the regional targets for the Development Plan period.

There are lands designated in rural villages and rural nodes that are sufficient in area to accommodate local rural based housing need across the County. In this instance the quantum of land identified in the proposed Node of Kilskeer as well as the additional lands in the close-by g designated rural nodes at Killallon, Drumbarragh, Ballinlough and Fordstown are adequate in area to accommodate local rural based housing need. There is also provision available within the adjoining rural village at Crossakiel and the larger urban settlement of Kells.

Furthermore, extending the rural node as proposed would result in encroachment onto and loss of valuable agricultural and lands.

In conclusion, there is no evidence-based need or planning rationale for the extension of the rural node which would be in breach of the Core Strategy of the Draft Plan and the Regional Spatial and Economic Strategy and as such would be contrary to proper planning and sustainable development.

#### **Chief Executive's Recommendation**

No change recommended.

<b>Submission No.:</b>	MH-C5-638
<b>Submitted by:</b>	SLR Consulting on behalf of Irish Cement
<b>Submission Theme(s):</b>	Extractive Industries, Chapter 9 Rural Development Strategy.
<b>Summary of Submission:</b>	
<p>This submission on behalf of Irish Cement relates to the policies and objectives associated with the extractive industries as well as a number of relevant policies within section 9.9 Extractive Industry and Building Materials Production.</p> <p>Irish cement has a number of property assets within the MCC administrative area including sites at;</p> <ul style="list-style-type: none"><li>• Donore Quarry</li><li>• Platin (cement works and quarry)</li></ul> <p>In summary the submission provides confirms that raw materials suitable for the manufacture of cement are now evenly distributed across the Country or County. Irish Cement are broadly in favour of the policies and objectives outlined in the draft CDP however the submission seeks to</p>	

highlight that there is further potential to strengthen policy provisions in relation to identifying and protecting raw materials suitable for cement manufacture as well as aggregate reserves in the County.

Reference is made to English planning guidance which states that the relevant planning authorities should adopt a systematic approach for safeguarding mineral resources which include the following principles;

- Uses best available information on the location of all mineral (raw materials suitable for cement manufacture as well as aggregate) resources in the authority area. For example, this may include use of Geological Survey of Ireland (GSI) mapping as well as industry sources;
- Consults with extractive industry, local communities and other relevant interests to define Minerals Safeguarding Areas;
- Sets out Mineral Safeguarding Areas on the policies map that accompanies the county of local development plans; and
- Adopts clear development management policies which set out how proposals for non minerals development in Minerals Safeguarding Areas will be handled, and what action applicants for development should take to address the risk of losing the ability to extract the resource. This may include policies that encourage the prior extraction of minerals, where practicable, if it is necessary for non-mineral development to take place in Minerals Safeguarding Areas and to prevent the unnecessary sterilisation of minerals.

In accordance with the above approach Irish Cement suggest that under RUR POL 39 areas containing proven deposits are shown on a map in order to protect them from the future development of incompatible land use;

Under RUR POL 43 Irish Cement suggest that options for alternative end uses such as residential, commercial or leisure might be considered where demand for such uses is clear and does not undermine the settlement strategy or other policies and objectives within the plan;

It is also highlighted that a type-o under DM OBJ 130 which states that all applications for extract industry development shall comprehensively address the following criteria as part of a pre-application discussion and/or planning application proposals – this should read **extractive**;

The adopted county development plan should ensure that both the extraction of raw materials suitable for cement manufacture and other production of cement can take place in suitable locations where the resource exists. It is important to ensure that the future interpretation of county development plan policies and does not prevent the secure, long-term supply of cement to the construction industry in Ireland.

#### **Chief Executive's Response**

The Council acknowledges the need for extractive industries in terms of supply of aggregate materials for the construction sector, delivering transport infrastructure and the export market. The wide distribution of resources is recognised and known deposits and sites were mapped by the Geological Survey of Ireland (GSI) in 2004 and updated in 2014. The GSI aggregate potential mapping illustrates potential crushed rock and gravel deposits and assess the interactions between the development of these resources and certain land uses such as bore holes and events such as landslides.

The Council has undertaken an examination of quarries within its administrative area in accordance with section 261A of the Planning & Development Act 2000, as amended to



determine whether development was carried out which would have required EIA or AA having regard to the EIA Directive and Habitats Directive.

It is the Councils policy (RUR POL 37) to facilitate adequate supplies of aggregate resources to meet the future growth needs of the County and the wider region while addressing key environmental, traffic and social impacts and details of rehabilitation.

It is also the Councils policy (RUR POL 43) to ensure that all existing workings are rehabilitated to suitable land uses and that all future extraction activities allow for rehabilitation of pits and proper land use management. The biodiversity value of the site should be considered in the first instance when preparing restoration plans. Where land filling is proposed, inert material is the preferred method. Each planning application shall be considered on a case by case basis and where relevant will be dealt with under the relevant regional Waste Management Plan.

DM OBJ 130 – typo noted and CDP to be updated accordingly and shall be detailed in errata of this document.

#### **Chief Executive's Recommendation**

No Change

<b>Submission No.:</b>	MH-C5-659
<b>Submitted by:</b>	SLR Consulting on behalf of Roadstone Limited
<b>Submission Theme(s):</b>	Extractive Industries , Chapter 9 Rural Development Strategy
<b>Summary of Submission:</b>	
<p>This submission on behalf of Roadstone Ltd relates to the policies and objectives associated with the extractive industries as well as a number of relevant policies within section 9.9 Extractive Industry and Building Materials Production.</p> <p>Roadstone limited have a number of property assets within MCC administrative area including:</p> <ul style="list-style-type: none"> <li>• Lands at Ballynakill, Rathcore, Enfield;</li> <li>• Barleyhill Quarry, Kingscourt;</li> <li>• Denhamstown Quarry, Ardcath;</li> <li>• Carrickleck;</li> <li>• Moyfin, Longwood;</li> <li>• Mullaghcrone Quarry, Drogheda;</li> <li>• Stoneyford Quarry, Duleek;</li> <li>• Trim Quarry, Trim</li> </ul> <p>In summary, the submission confirms that raw materials suitable for the manufacture of cement are now evenly distributed across the Country or County. Roadstone Ltd are broadly in favour of the policies and objectives outlined in the draft CDP however, the submission seeks to highlight that there is further potential to strengthen policy provisions in relation to identifying and protecting raw materials suitable for cement manufacture as well as aggregate reserves in the County.</p> <p>Reference is made to English planning guidance which states that the relevant planning authorities should adopt a systematic approach for safeguarding mineral resources which include</p>	

the following principles;

- Uses best available information on the location of all mineral (raw materials suitable for cement manufacture as well as aggregate) resources in the authority area. For example, this may include use of Geological Survey of Ireland (GSI) mapping as well as industry sources;
- Consults with extractive industry, local communities and other relevant interests to define Minerals Safeguarding Areas;
- Sets out Mineral Safeguarding Areas on the policies map that accompanies the county of local development plans; and
- Adopts clear development management policies which set out how proposals for non-minerals development in Minerals Safeguarding Areas will be handled, and what action applicants for development should take to address the risk of losing the ability to extract the resource. This may include policies that encourage the prior extraction of minerals, where practicable, if it is necessary for non-mineral development to take place in Minerals Safeguarding Areas and to prevent the unnecessary sterilisation of minerals.

In accordance with the above approach, Roadstone Ltd suggest that under RUR POL 39 areas containing proven deposits are shown on a map in order to protect them from the future development of incompatible land use;

Under RUR POL 43 Irish Cement suggest that options for alternative end uses such as residential, commercial or leisure might be considered where demand for such uses is clear and does not undermine the settlement strategy or other policies and objectives within the plan;

It is also highlighted that a type-o under DM OBJ 130 which states that all applications for extract industry development shall comprehensively address the following criteria as part of a pre-application discussion and/or planning application proposals – this should read **extractive**;

The adopted county development plan should ensure that both the extraction of raw materials suitable for cement manufacture and other production of cement can take place in suitable locations where the resource exists. It is important to ensure that the future interpretation of county development plan policies and does not prevent the secure, long-term supply of cement to the construction industry in Ireland.

### Chief Executive's Response

The Council acknowledges the need for extractive industries in terms of supply of aggregate materials for the construction sector, delivering transport infrastructure and the export market. The wide distribution of resources is recognised and known deposits and sites were mapped by the Geological Survey of Ireland (GSI) in 2004 and updated in 2014. The GSI aggregate potential mapping illustrates potential crushed rock and gravel deposits and assess the interactions between the development of these resources and certain land uses such as bore holes and events such as landslides.

The Council has undertaken an examination of quarries within its administrative area in accordance with section 261A of the Planning & Development Act 2000, as amended to determine whether development was carried out which would have required EIA or AA having regard to the EIA Directive and Habitats Directive.

It is the Councils policy (RUR POL 37) to facilitate adequate supplies of aggregate resources to

meet the future growth needs of the County and the wider region while addressing key environmental, traffic and social impacts and details of rehabilitation.

It is also the Councils policy (RUR POL 43) to ensure that all existing workings are rehabilitated to suitable land uses and that all future extraction activities allow for rehabilitation of pits and proper land use management. The biodiversity value of the site should be considered in the first instance when preparing restoration plans. Where land filling is proposed, inert material is the preferred method. Each planning application shall be considered on a case by case basis and where relevant will be dealt with under the relevant regional Waste Management Plan.

DM OBJ 130 – typo noted and CDP to be updated accordingly and shall be detailed in errata in Appendix xx of this document.

#### **Chief Executive's Recommendation**

No change recommended.

<b>Submission No.(s):</b>	MH-C5-699
<b>Submission by:</b>	Thomas Nolan
<b>Submission Theme(s):</b>	Chapter 9 Rural Development Strategy
<b>Summary of Submission:</b>	
<ul style="list-style-type: none"><li>This submission refers to lands at Kilcloon Node. It is requested that the node is extended to include a tract of land to the north so as it aligns to both sides of the road.</li></ul>	
<b>Chief Executive's Response</b>	
<p>There are currently 50 identified Rural Nodes within the Draft Plan to cater for rural generated housing need. These Rural Nodes have a strong residential focus and are based on a small number of individual houses. They provide an alternative to one-off housing in the countryside through the consolidation of rural residential development within existing small settlements. It is envisaged that for the most part, they will provide an opportunity for family members of existing households within the Node to build a new home, or reuse and adapt an existing structure, in proximity to their family home, by subdividing large sites.</p> <p>This submission along with many others requests the extension of individual Rural Nodes. Extending rural nodes on an ad hoc basis would represent a piecemeal uncoordinated approach for designating land for which there is no evidence-based need.</p> <p>The quantum and location of land identified for development in the County is directly influenced by the Development Plan's Settlement and Core Strategy. Based on the evidence-based approach adopted in the Core Strategy for the County, it is clear, that Meath has a significant and sufficient quantum of land designated to meet the regional targets for the Development Plan period.</p> <p>Lands are designated in rural villages and rural nodes to accommodate local rural based housing need across the County. In this instance it is considered that the area of land already designated in Kilcloon is sufficient to support rural-generated dwellings for members of the rural community of the area. Furthermore, lands are designated at Batterstown rural node which can also cater for local rural housing need and significant provision for housing is also available within the larger urban settlement of Dunboyne.</p>	

In conclusion, there is no evidence-based need or planning rationale for the extension of rural nodes which would be in breach of the Core Strategy of the Draft Plan and the Regional Spatial and Economic Strategy and as such would be contrary to proper planning and sustainable development.

#### **Chief Executive's Recommendation**

No change recommended.

<b>Submission No.(s):</b>	MH-C5-705
<b>Submission by:</b>	Fergus McKeown
<b>Submission Theme(s):</b>	Chapter 9 Rural Development Strategy
<b>Summary of Submission:</b>	
<p>This submission requests that MCC extend the boundary of the proposed Laytown/Bettystown – Monknewtown rural node area to include Dolly Mitchell's public house and associated lands as indicated on the attached map. (The submission writer owns this premises).</p> <p>It is submitted that Dolly Mitchell's has long been established as a centre/focal point of the local rural community with residents regularly travelling back and forth between the various nearby community facilities which are located within the proposed Monknewtown rural node area together with 'Smiths' local sweet/grocery shop which is located to the west of 'Dolly Mitchell's' along the N51.</p>	
<b>Chief Executive's Response</b>	
<p>There are currently 50 identified Rural Nodes within the Draft Plan to cater for rural generated housing need. These Rural Nodes have a strong residential focus and are based on a small number of individual houses. They provide an alternative to one-off housing in the countryside through the consolidation of rural residential development within existing small settlements. It is envisaged that for the most part, they will provide an opportunity for family members of existing households within the Node to build a new home, or reuse and adapt an existing structure, in proximity to their family home, by subdividing large sites.</p> <p>This submission along with many others requests the extension of individual Rural Nodes. Extending rural nodes on an ad hoc basis would represent a piecemeal uncoordinated approach for designating land for which there is no evidence-based need.</p> <p>The quantum and location of land identified for development in the County is directly influenced by the Development Plan's Settlement and Core Strategy. Based on the evidence-based approach adopted in the Core Strategy for the County, it is clear, that Meath has a significant and sufficient quantum of land designated to meet the regional targets for the Development Plan period.</p> <p>Lands are designated in rural villages and rural nodes to accommodate local rural based housing need across the County. In this instance it is considered that the area of land already designated in Monknewtown is sufficient to support rural-generated dwellings for members of the rural community of the area. Furthermore, provision for housing is also available within the nearby village of Slane.</p> <p>In conclusion, there is no evidence-based need or planning rationale for the extension of rural nodes which would be in breach of the Core Strategy of the Draft Plan and the Regional Spatial</p>	

and Economic Strategy and as such would be contrary to proper planning and sustainable development.

#### **Chief Executive's Recommendation**

No change recommended.

<b>Submission No:</b>	MH-C5-720
<b>Submitted by:</b>	Downey Planning on behalf of Janet Richardson
<b>Submission Theme(s):</b>	Borranstown, Land Use Zoning Request , Chapter 9 Rural Development Strategy.
<b>Summary of Submissions:</b>	
<p>In summary this submission proposes;</p> <ul style="list-style-type: none"> <li>• That the subject site be recognised and noted as suitable for an equine enterprise use that could potentially include horse stables, tack room and training room / office, enclosed and / or open sand area and a track for equine training and recreational horse riding;</li> <li>• It is proposed that policy objectives under the draft plan be further strengthened to consider issues of access and land use to sites not suitable for pure agricultural purposes that could instead be developed for equine enterprise developments;</li> <li>• It is proposed that a locational policy reference be added to the draft plan to indicate the potential future of the land for same associated within the subject site.</li> </ul> <p>The subject site is located along the N2 National Road onto the north of Ashbourne. The subject land is located on the border between the Meath and Dublin county areas currently on unzoned agricultural land extending circa 1.39 Ha.</p> <p>It is submitted that it should be noted that the potential use on the land for equine enterprise also conforms to policies ED POL 25, RUR POL 23 and RURPOL 24, and that the draft plan should strengthen its policies to include the ideas of design led, flexible and pragmatic solutions that can assist to bring land such as the subject-land into active use for equine enterprises.</p>	
<b>Chief Executive's Response</b>	
<p>The objective of the Rural Area (RA) zoning objective is to protect and promote in a balanced way, the development of agriculture and forestry and sustainable rural related enterprise, community facilities, biodiversity, the rural landscape and the built and cultural heritage.</p> <p>The primary objective is to protect and promote the value and future sustainability of rural areas. In this context, while it is accepted that agricultural related activities are often the most appropriate in the rural area, this does not negate the opportunity to explore other viable land uses such as that identified in the submission which may be a sustainable <u>rural related enterprise</u> as outlined above.</p> <p>However, the principle for the development of same will be considered as part of a detailed planning application in order to assess the potential adverse impacts that may result if planning permission is to be granted. Therefore, it is not considered necessary to identify a site specific objective for this site as the principle for development for such rural related land uses will be determined as part of the Development Management process.</p>	

<b>Chief Executive's Recommendation</b>
No change recommended.

<b>Submission No.:</b>	MH-C5-740
<b>Submitted by:</b>	Sean Boyle Architect/Surveyor/Planning Consultant on behalf of Noel Sheridan
<b>Submission Theme(s):</b>	Chapter 9, Rural Development Strategy – Rural Nodes

**Summary of Submission:**

This submission requests a change to the node boundary for Wilkinstown Node as detailed in the Draft Plan. The submission relates to 7.7 acres of land adjacent to the south of Wilkinstown National School.

The submission requests that the node be deeper and reduced in length and incorporates 12 sites, 8 for local need and 4 for general open sale but with only one entrance to the R162. It is stated that the proposal would take up less road frontage and the design would be safer with only one entrance onto the R162.

The submission states that 4 sites for general sale would facilitate the construction of a new internal road which would include all services apart from sewerage. It is stated that it is also proposed to install a bus stop at the request of the TII and a portion of land would be donated at the request of the school.

**Chief Executive's Response**

There are currently 50 identified Rural Nodes within the Draft Plan to cater for rural generated housing need. These Rural Nodes have a strong residential focus and are based on a small number of individual houses. They provide an alternative to one-off housing in the countryside through the consolidation of rural residential development within existing small settlements. It is envisaged that for the most part, they will provide an opportunity for family members of existing households within the Node to build a new home, or reuse and adapt an existing structure, in proximity to their family home, by subdividing large sites.

There is a necessity to carefully manage future housing in Rural Nodes. New housing in Rural Nodes is reserved for persons who are an intrinsic part of the rural community. It is therefore not considered appropriate to amend this policy.

This submission along with many other submissions requests amending the boundaries of the rural node. While it is noted in this case that the relative increase on the quantum of land included is small, extending rural nodes on an ad hoc basis would represent a piecemeal uncoordinated approach for designating land for which there is no evidence-based need.

**Chief Executive's Recommendation**

No change recommended.

<b>Submission No:</b>	MH-C5-750
<b>Submitted by:</b>	James McAteer
<b>Submission Theme(s):</b>	Rural Node, Wilkinstown

**Summary of Submissions:**

This submission seeks the inclusion in the node area section 9 volume 1 for lands joining the two land parcels forming the Wilkinstown node.

It is submitted that a community zoning would be appropriate to take of the fact that it is a nursing home and not residential.

The site is located on the R162 road outside Wilkinstown village and it is cantered between the two nodes and joins the two nodes.

**Chief Executive's Response**

There are currently 50 identified Rural Nodes within the Draft Plan to cater for rural generated housing need. These Rural Nodes have a strong residential focus and are based on a small number of individual houses. They provide an alternative to one-off housing in the countryside through the consolidation of rural residential development within existing small settlements. It is envisaged that for the most part, they will provide an opportunity for family members of existing households within the Node to build a new home, or reuse and adapt an existing structure, in proximity to their family home, by subdividing large sites.

This submission along with many others requests extending the boundaries of Rural Nodes. Extending rural nodes on an ad hoc basis would represent a piecemeal uncoordinated approach for designating land for which there is no evidence-based need.

The quantum and location of land identified for development in the County is directly influenced by the Development Plan's Settlement and Core Strategy. Based on the evidence-based approach adopted in the Core Strategy for the County, it is clear, that Meath has a significant and sufficient quantum of land designated to meet the regional targets for the Development Plan period.

There are lands designated in rural villages and rural nodes to accommodate local rural based housing need across the County. In this instance it is considered that the area of land already designated in Wilkinstown contains sufficient lands to support rural-generated dwellings for members of the rural community of Wilkinstown.

**Chief Executive's Recommendation**

No change recommended.

<b>Submission No.(s):</b>	MH-C5-756
<b>Submission by:</b>	Trevor and Geraldine Sadler
<b>Submission Theme(s):</b>	Chapter 9 Rural Development Strategy
<b>Summary of Submission:</b>	
<p>This submission requests the designation of lands in the vicinity of St. Joseph's National School Mulhussey as a Rural Node.</p>	
<p>Support is expressed for RUR OBJ 4 which seeks to promote the vitality and future viability of rural communities by ensuring a functional relationship between housing in rural nodes and rural</p>	



villages and the rural areas in which they are located.

It is submitted that Mulhussey is a well-established and growing rural community centred around St. Joseph's national school (established in 1964).

#### **Chief Executive's Response**

There are currently 50 identified Rural Nodes within the Draft Plan to cater for rural generated housing need. These Rural Nodes have a strong residential focus and are based on a small number of individual houses. They provide an alternative to one-off housing in the countryside through the consolidation of rural residential development within existing small settlements. It is envisaged that for the most part, they will provide an opportunity for family members of existing households within the Node to build a new home, or reuse and adapt an existing structure, in proximity to their family home, by subdividing large sites.

This submission along with others requests the designation of an additional Rural Nodes. The designation of additional Rural Nodes within the County would represent a piecemeal uncoordinated approach for designating land for which there is no evidence-based need.

The quantum and location of land identified for development in the County is directly influenced by the Development Plan's Settlement and Core Strategy. Based on the evidence-based approach adopted in the Core Strategy for the County, it is clear, that Meath has a significant and sufficient quantum of land designated to meet the regional targets for the Development Plan period.

There are lands designated in rural villages and rural nodes that are sufficient in area to accommodate local rural based housing need across the County. In this instance the close-by existing designated rural nodes at Kilcloon, Batterstown and Culmullen are adequate in area to accommodate local rural based housing need. There is also provision available within the adjoining rural villages at Summerhill and the larger urban settlements of Dunshaughlin and Maynooth.

Furthermore, designating additional rural nodes would result in a development pattern with deficiencies in terms of the provision of basic infrastructure and public services, in addition to unsustainable travel patterns, encroachment onto and loss of valuable agricultural lands and adverse visual impact.

In conclusion, there is no evidence-based need or planning rationale for the designation of new rural nodes which would be in breach of the Core Strategy of the Draft Plan and the Regional Spatial and Economic Strategy and as such would be contrary to proper planning and sustainable development.

#### **Chief Executive's Recommendation**

No change recommended.

<b>Submission No.:</b>	MH-C5-817
<b>Submitted by:</b>	Cllr Paddy Meade
<b>Submission Theme(s):</b>	Miscellaneous
<b>Summary of Submission:</b>	

This submission includes the following observations;

### **Volume One**

#### **Amendment No. 1**

Amend the proposed zoning on “Southern Environs of Drogheda so that:

The proposed link road between the M1 Motorway and R132 in its entirety be shown, as seen in “Image 51” of “5.11 Traffic and Transportation” of the “Local Area Plan for the Southern Environs of Drogheda 2009-2015”.

#### **Amendment No. 2**

Amend the proposed zoning on “Sothern Environs of Drogheda so that:

A new bridge crossing the river Boyne to the East of the existing Train Line is shown. Also show a new link road going south from this new bridge to connect back to the R132 (Old Dublin Road).

-This will give great access to Drogheda Port as well as taking much passing traffic out of town centre.

-This would tie in with both:

1) The Louth County Development Plan 2011-2017 Chapter 5 - 5.7 Strategic Road Objective Number 3. – “Bridge at Greenhills linking the Southern Environs of Meath with the Port Access Northern Cross Route (PANCR)”

2) “Image 51” of “5.11 Traffic and Transportation” of the “Local Area Plan for the Southern Environs of Drogheda 2009-2015”

#### **Amendment No. 3**

Amend the proposed zoning on “Sothern Environs of Drogheda so that:

“E2/E3 General Enterprise and Employment” Zoning becomes “New Residential” Zoning in cases where “E2/E3” Zoning is within 85 meters of existing dwellings.

#### **Amendment No. 4**

Retain all Residential Zoning within Slane Village as adopted by Meath County Council in Meath County Development Plan 2013-2019.

#### **Amendment No. 5**

Amend the proposed zoning on “Sheet No: 34 (a) Slane so that:

The SDMS Premises at Slane Industrial Estate (C15KO64) and surrounding building are Zoned for Mixed Used Developments.

#### **Amendment No. 6**

Amend the proposed zoning on “Sheet No: 34 (a) Slane so that:

The “D1 – Tourism” zoning would be extended encompasses the site boundary on which it is located.

**Amendment No. 7**

Amend the proposed zoning on "Sheet No: 34 (a) Slane so that:

It delivers more parking to the village.

**Amendment No. 8**

Amend the proposed zoning on "Sheet No: 34 (a) Slane so that:

A Bus Bay with Park and Ride Physicality is included alongside the N2.

**Amendment No. 9**

Amend the proposed zoning on "Sheet No: 34 (a) Slane so that:

The open area opposite the Hotel be rezoned from "B1 Commercial Village Centre" to Mixed use between "F1 Open Space," Car, and Bicycle Parking.

**Amendment No. 10**

Retain Residential Zoning (A1 or A2 Zoning as appropriate) within Duleek on lands adopted by Meath County Council in Meath County Development Plan 2013-2019 as "Residential Phase 2 (Post 2019)" where the site has road access.

**Amendment No. 11**

Amend the proposed zoning on "Sheet No: 12 (a) Duleek so that:

The Proposed Duleek By-Pass running from the R150 to the R152 is included.

**Amendment No. 12**

Amend the proposed zoning on "Sheet No: 12 (a) Duleek so that:

Adequate provision and area is zoned that would be suitable for a Post Primary School.

**Amendment No. 13**

Amend the proposed zoning on "Sheet No: 5.4 (b) Bettystown/ Laytown/ Mornington East / Donacarney/ Mornington so that:

More lands are zoned for "E2 – General Enterprise and Employment" This may involve extending this map west.

**Amendment No. 14**

Amend all costal maps to remove all "A1 and A2 Residential Zoning" on lands under 5 meters mean sea level (MSL) along the Meath coast due to the rising Sea Waters due to Global Warming until such time as adequate flood defenses are installed.

**Amendment No. 15 – As agreed by Council**

Amendment to "Shop Fronts" to add the following line at the end of existing:

"Not to cause excessive light pollution exterior sign lighting including LED sign lights as used commonly by pharmacy's and service stations should be restricted from use and conditional to the opening hours of the said business."

**Amendment No. 16**

Amendment to “Additional Primary and Post Primary Educational Requirements” to include the following text:

“Meath County Council identifies the town of Duleek as an area requiring additional post-primary school facilities.”

**Amendment No. 17**

Amendment to “Fire Stations” to include the following text:

“The Council sees the significant benefit for an additional Fire Station in the Duleek/East Meath Coast area.”

**Amendment No. 18**

Amendment to “8.6.1 UNESCO World Heritage Site – Brú na Bóinne” to include the following text:

“The Council in support of sustainable communities with actively encourage locals from the Bru na Boinne area to stay and live their life in the area.”

**Amendment No. 19**

Amendment to “9.5.4 Rural Nodes” in “Table 9.2” section “Laytown-Bettystown MD – Rural Nodes” to include the following location:

- Starinagh, Collon, Co. Meath

Note: The new mapping for the Rathdrinagh Node would include the Public House, the Shop, the Primary School and surrounding structures. (Townlands effected in part include: Rathdrinagh, Knockcommon, Thurstianstown).

**Amendment No. 20**

Amendment to “9.5.4 Rural Nodes” in “Table 9.2” section “Laytown-Bettystown MD – Rural Nodes” to include the following areas location:

- Monknewtown.

Note: The new mapping for the Monknewtown Node would include the Public House, the Shop, the Church, Community Hall, Community GAA and Soccer Pitches and surrounding structures. (Townlands effected in part include: Monknewtown and Balfoeddock.

**Amendment No. 21**

Amendment to “Rural Node Map” of “Lobinstown” to include surrounding properties and land.

**Amendment No. 22** – As agreed by council.

Amendment to “11.8.2 Industrial, Office, Warehousing and Business Park Development” Objectives to include the following text:

The use of coloured cladding to match Ireland’s natural landscape is most suitable.

**Amendment No. 23** – As agreed by council.

Amendment to “11.8.3 Agricultural Buildings & Structures” Objective “DB OBJ 125” to read as

follow:

"The use of dark and light green coloured cladding to match Irelands natural landscape is most suitable for farm buildings."

#### **Amendment No. 24**

That the County Development Plan acknowledge the potential of wind power installations to be a source of severe noise nuisance as acknowledged in the High Court before Mr Justice Gilligan on Tuesday the 6th of December 2016 Ref: 2011 No. 9955 where in the Court recorded the admission of liability for nuisance of the defendants Enercon Wind Farm Services Ireland Limited and Carrigcannon Windfarm Limited

#### **Amendment No. 25**

That the New County Development plan adopt the Denbrook Planning Condition for the purpose of policing wind farm noise nuisance.

"At the request of the local planning authority following the receipt of a complaint the wind farm operator shall, at its expense, employ a consultant approved by the local planning authority, to assess whether noise emissions at the complainant's dwelling are characterised by greater than expected amplitude modulation. Amplitude modulation is the modulation of the level of broadband noise emitted by a turbine at blade passing frequency. These will be deemed greater than expected if the following characteristics apply:

- a) A change in the measured L Aeq, 125 milliseconds turbine noise level of more than 3 dB (represented as a rise and fall in sound energy levels each of more than 3 dB) occurring within a 2 second period.
- b) The change identified in (a) above shall not occur less than 5 times in any one minute period provided the L Aeq, 1-minute turbine sound energy level for that minute is not below 28 dB.
- c) The changes identified in (a) and (b) above shall not occur for fewer than 6 minutes in any hour.

Noise emissions at the complainant's dwelling shall be measured not further than 35m from the relevant building and not closer than within 3.5m of any reflective building or surface, or within 1.2m of the ground."

#### **Amendment No. 26**

That the County Development Plan require all High Voltage transmission lines over 225,000 volts to be routed underground.

#### **Amendment No. 27**

That notwithstanding other clauses in the Development Plan there be a presumption in favour of rural housing development where applicants can demonstrate they are engaged in economic activity in the area they are seeking to be housed. The Development Plan must recognize that many businesses start on a small scale and that they tend to grow on the basis of the capital earned by the business.

#### **Amendment No. 28**

That Meath County Council undertake a program over the life of the Plan to examine and report on the feasibility of relocating Dublin Port to the Meath Coastline as a measure aimed at:

1. Releasing a lot of land in Dublin for high rise development as a measure to provide large

quantities of housing in the centre of Dublin at low cost.

2. Reducing the demand for dormitory housing in Meath for Dublin workers.

3. To increase employment generation and employment opportunities in Meath.

4. To increase the Meath rates base.

5. To facilitate the development of flood defences and tidal barriers in Dublin to cope with climate change induced rising sea levels.

#### **Amendment No. 29**

Amendment to “Rural Nodes” in “Table 9.2” section “Laytown-Bettystown MD – Rural Nodes” to include the following two locations:

- Starinagh, Collon, Co. Meath

#### **Amendment No. 30**

Amendment to “Rural Nodes” in section “Kells MD – Rural Nodes” to increase the size of the following Node:

- Meath Hill, Co. Meath

#### **Amendment No. 31**

Amend the proposed zoning on “Sothern Environs of Drogheda so that:

A new link road connects the North side of the IDA Donore Road Business Park to the Rathmullan Road.

- This will open the land more industry which may now be needed as Amazon will be using so much of the IDAs exciting land.

- This will also take considerable traffic of the Rathmullan road and of the LMFM and Thatch Bar junctions.

### **Chief Executive’s Response**

#### **Amendment Number Reponses**

1. This has been reviewed and the proposed link road between the M1 and R132 is shown in its entirety in Map 35(a) of the Draft Plan correlates with Map 5.1 of the Local Area Plan for the Southern Environs of Drogheda 2009-2015.

2. This development of a bridge crossing is supported, and the Transportation Department will liaise with Louth County Council in respect of a preferred location. However, the location of this bridge will be subject to the findings of a Transport Study which will be carried out as part of the Joint Urban Area Plan. This will determine the most suitable location for the development of a crossing point. This is already supported in the Draft Plan in MOV OBJ 52 which aims ‘To carry out a transport study for Drogheda in conjunction with Louth County Council as part of the future Joint Urban Plan. In the absence of final consensus on the location of the bridge, it would be premature to identify a location on Map 35(a) of the Draft Plan until consensus between both

local authorities has been achieved.

3. Buffer zones have been provided between Employment zoned and Residential zoned lands. The impact of any proposal on adjoining residential property will be assessed as part of the Development Management process.

4. As part of the review of the County Development Plan it is required as per Section 10 (1A) of the Planning and Development Act 2000, as amended that a core strategy is provided. The core strategy requires that the planning authority outline the population growth for a settlement in line with national and regional policy and ensure that a sufficient quantum of land is provided so as to allow for the delivery of this population growth. Essentially, as outlined in the Guidance Note on Core Strategies issued by the Department, the Core Strategy must provide a transparent evidence-based rationale for the amount of land proposed to be zoned for residential and allied mixed-use zonings. It is considered that the proposed amendment is not consistent with the population projections outlined at a regional level and without the provision of an evidence base the proposed amendment would be inappropriate. The proposed level of growth and therefore land use zonings proposed for Slane in the Draft Plan is consistent with the national and regional planning policy and as such no amendment is proposed in this regard.

5. It is not considered appropriate to amend the existing zoning at Slane Industrial Estate for Mixed Use. The CDP seeks to protect industrial / employment zonings particularly where they are established. However, MCC acknowledge the existing role and function of the SDMS at this location. The SDMS is considered a compatible use at this location given the established nature of the operation. Furthermore, leisure uses are also considered to be 'open for consideration' on sites zoned for E2 General Enterprise and Employment.

6. The D1 tourism zoning at the Milhouse Slane is considered appropriate in the context of the site characteristics and local context. It should be noted that the site adjoins the floodplain of the River Boyne and abuts an area of high amenity south of Slane Industrial Estate. Permissible and open for consideration uses for same are outlined in Chapter 11 of the draft County Development Plan.

7. The provision of additional car parking spaces in Slane must serve to strike a balance between providing an adequate number of spaces to cater for likely traffic generation without resulting in making private transport the most attractive option for journeys, particularly short journeys within urban areas which could be done by cycling or walking. This is something that will be addressed under the Public Realm Plan for Slane.

8. With regard to the allocation of the Bus Bay with Park and Ride Facilities, the Draft Plan contains a range of Park and Ride objectives to promote and support the provision of Park-and-Ride facilities which improve public transport accessibility without exacerbating road congestion. It should be noted that the NTA set up a specific office in 2020 to undertake feasibility studies to provide for Park and Ride facilities at appropriate locations in the Greater Dublin Area including County Meath. This will determine the most optimal locations for a Park and Ride.

9. The land use strategy for Slane seeks to promote and strengthen the commercial village centre of Slane by facilitating a compact and consolidated urban core. Given the location of the subject lands which are in the heart of the village, it is considered that B1 Village and Town Centre uses are the most appropriate and will help the deliver a compatible and sustainable use for the site.

10. As part of the review of the County Development Plan it is required as per Section 10 (1A) of



the Planning and Development Act 2000, as amended that a core strategy is provided. The core strategy requires that the planning authority outline the population growth for a settlement in line with national and regional policy and ensure that a sufficient quantum of land is provided so as to allow for the delivery of this population growth. Essentially, as outlined in the Guidance Note on Core Strategies issued by the Department, the Core Strategy must provide a transparent evidence-based rationale for the amount of land proposed to be zoned for residential and allied mixed-use zonings. It is considered that the proposed amendment is not consistent with the population projections outlined at a regional level and without the provision of an evidence base the proposed amendment would be inappropriate. The proposed level of growth and therefore land use zonings proposed for Duleek in the Draft Plan is consistent with the national and regional planning policy and as such no amendment is proposed in this regard.

11. The location of the proposed Duleek By-Pass is reflected in Map 5.2 of the Draft Plan and is supported by DUL OBJ 8 which aims 'To examine the feasibility and progress the provision of the R150 bypass for Duleek to the south west of the town.

12. As stated in the submission from the Department for Education Projected increase in school place requirements can be met at existing schools. Duleek is contained within the Drogheda School Planning Area. A new post primary school to serve the Laytown and Drogheda School Planning Areas opened in 2019 and this is expected to have sufficient capacity to absorb any additional post primary school place requirements which may emerge in Duleek. Emerging post primary school place requirements in the School Planning Area will continue to be kept under review.

13. Due to the proximity of the area to Drogheda and Dublin, it would be challenging to attract a large scale employer however there are opportunities to attract small-medium sized enterprises that could avail of the skilled workforce and the connectivity that the area provides to Dublin and Drogheda. In addition, there are opportunities to provide co-working facilities in the area that would function as an outreach for city based employers. It is recognised that such employment would be vital to improving the jobs ratio and creating a more sustainable settlement and reversing the substantial rates of outbound commuting experienced in this area. To this end the strategic employment site has been identified on the lands adjacent to the rail station in Laytown. Owing to the designation of LBMD as a 'self-sustaining town' it is considered that a sufficient quantum of land has been zoned for the enterprise and employment use and that a White Land zoning is not required or appropriate having regard to the scale of development which is envisaged for these lands.

14. All planning applications within identified Flood Zones are subject to a detailed Site Specific Flood Risk Assessment and Justification Tests which assesses in detail that any given proposal would not be at risk of flooding or increase the risk of flooding elsewhere. With the exception of sites which have been granted planning permission no new residential zonings are proposed within Flood Zones in East Meath.

15. The DM Chapter has been revised (See attached Appendices). It is an objective of the Council 'To require that proposals for new/replacement shop fronts have regard to the 'Shop front and Signage Guidance' document, 2017 or any updates thereof' which contains detailed guidance on suitable shopfront lighting.

16. The provision of new schools is primarily the responsibility of the Department of Education and Skills. A submission was received from the Department of Education and Skills and the following was noted with regard to post primary educational facilities in Duleek:

- *Duleek is contained within the Drogheda School Planning Area. A new post primary school to serve the Laytown and Drogheda School Planning Areas opened in 2019 and this is expected to have sufficient capacity to absorb any additional post primary school place requirements which may emerge in Duleek. Emerging post primary school place requirements in the School Planning Area will continue to be kept under review.*

If further sites are considered necessary in the future, the Council will work with the Department of Education and Skills and other bodies to ensure the development of schools at the most appropriate locations.

17. The issue with regard to the provision of a fire station in Duleek, was previously raised and considered as part of the NOMs from the Elected Members. Section 7.7.11 of the Draft Plan addresses the topic of the “Fire Stations”. A specific objective included within this section of the plan is to “*To ensure communities are adequately serviced by a modern and effective Fire Service for the county and to facilitate the accommodation of fire service facilities in locations that allow ease of access and safe functioning with respect to the road network*”. The issue of a new fire station is something that could be considered under the review of the current “*Fire Service Operations Plan 2015-2019*”.

At present there is no proposal by Meath Fire Service to provide a fire station in Duleek. The current arrangement whereby fire brigade response in the Duleek area is provided by Drogheda, Navan and/or Ashbourne fire stations is deemed adequate and appropriate.

18. The primary policies and objectives for the UNESCO World Heritage Site of Brú na Bóinne relate to the preservation of its Outstanding Universal Value. The Council actively supports local sustainable communities from Bru na Boinne and provision is made within existing policies, objectives; HER Pol 7, HER POL 8, HER POL 9, HER POL 11, HER OBJ 7, HER OBJ 10, and HER OBJ12.

19. The issues raised in pts no. 19-21 and 29 in relation to Rural Nodes are noted. Extensions are proposed to existing boundaries at Monknewstown, Meathill and Lobinstown as well as a proposed new rural node at Starinagh, Collon.

20. There are currently 50 identified Rural Nodes within the Draft Plan to cater for rural generated housing need. The quantum and location of land identified for development in the County is directly influenced by the Development Plan’s Settlement and Core Strategy. Based on the evidence-based approach adopted in the Core Strategy for the County, it is clear, that Meath has a significant and sufficient quantum of land designated to meet the regional targets for the Development Plan period.

21. There are lands designated in rural villages and rural nodes to accommodate local rural based housing need across the County. It is considered that the area of land already designated contains sufficient lands to support rural-generated dwellings for members of the rural community throughout the County.

22. Extending rural nodes or designating new nodes on an ad hoc basis would represent a piecemeal uncoordinated approach for designating land for which there is no evidence-based need, contrary to proper planning and sustainable development.

23. The Development Management Standards promotes the use of dark coloured cladding, for example dark browns, greys, greens and reds as being most suitable for farm buildings and

traditional it is these colours which has been used for farm buildings.

24. Meath County Council will follow the Wind Energy Development Guidelines (2006) and any subsequent legislation with regard to wind energy developments as is stated in INF POL 41: *“To encourage the development of wind energy, in accordance with Government policy and having regard to the Landscape Character Assessment of the County and the Wind Energy Development Guidelines (2006) or any revisions thereof.”*

25. The adoption of the Denbrook Planning Condition would usurp the role and function of the development management process. The issue of noise should be assessed on a case by case basis as part of the evolution of the Environmental Impact Assessment. If appropriate, the proposed condition could be applied to a Wind Farm permission, where applicable.

26. The undergrounding of electricity infrastructure is supported by INF POL 50 which requires that the location of local energy services such as electricity, be undergrounded, where appropriate. With regard to the North-South Interconnector, which is an above-ground electricity connection, the decision to make the interconnector above ground was outside of the remit of the Local Authority. The project design was determined by Eirgrid and though Meath County Council were consulted on the detailed design, given that the Interconnector constituted strategic infrastructure development, the project was submitted directly to and assessed by An Bord Pleanála in 2016. The North-South interconnector is an important piece of infrastructure and will add security to the grid, but on a national level.

27. Please refer to Part 3 ‘Group Themed Submissions’ specifically grouped themed submission no 1. ‘Rural Housing Policy’ which affords adequate policy provision/support in terms of rural economic engagement and rural housing.

28. In relation to this matter it is noted that a new policy has been included as part of the response to MH-C5-375 and this addresses the potential feasibility of a port in Co. Meath. As such it is recommended that the submission author refer to MH-C5-375

29. There are currently 50 identified Rural Nodes within the Draft Plan to cater for rural generated housing need. These Rural Nodes have a strong residential focus and are based on a small number of individual houses. They provide an alternative to one-off housing in the countryside through the consolidation of rural residential development within existing small settlements. It is envisaged that for the most part, they will provide an opportunity for family members of existing households within the Node to build a new home, or reuse and adapt an existing structure, in proximity to their family home, by subdividing large sites.

This submission along with many others requests the designation of an additional Rural Nodes. The designation of additional Rural Nodes within the County would represent a piecemeal uncoordinated approach for designating land for which there is no evidence-based need.

The quantum and location of land identified for development in the County is directly influenced by the Development Plan’s Settlement and Core Strategy. Based on the evidence-based approach adopted in the Core Strategy for the County, it is clear, that Meath has a significant and sufficient quantum of land designated to meet the regional targets for the Development Plan period.

The lands designated in rural villages and rural nodes are sufficient in area to accommodate local rural based housing need across the County. In this instance the close-by rural node at

Grangegeeth is adequate in area to accommodate the local rural based housing need in this area.

Furthermore, designating additional rural nodes would result in a development pattern with deficiencies in terms of the provision of basic infrastructure and public services, in addition to unsustainable travel patterns, encroachment onto and loss of valuable agricultural and adverse visual impact.

30. See response to point no. 29 above.

31. The proposal for a new link road connecting the north side of the IDA Donore Road Business Park to the Rathmullen Road can be examined as part of the Transport Study which will accompany the Drogheda Joint Urban Area Plan.

#### **Chief Executive's Recommendation**

NO change recommended.

<b>Submission No.:</b>	MH-C5-818
<b>Submitted by:</b>	Cllr. Gillian Toole
<b>Submission Theme(s):</b>	Chapter 9 Rural Development Strategy
<b>Summary of Submission:</b>	
This submission relates to the designation of Rural Nodes:	
(2) It is queried why there are Rural nodes proposed at Oberstown and Edoxtown Rathfeigh. Only 2 miles apart along a busy route from R147 to N2	
<b>Chief Executive's Response</b>	
Oberstown and Edoxstown and the surrounding rural areas are located within 'Rural Areas Under Strong Urban Influence' and are therefore subject to significant development pressure for rural one off housing. Having regard to this, and in particular the physical and environmental characteristics of both settlements, it was considered appropriate to designate as Rural Nodes. It is envisaged that for they will provide an opportunity for family members of existing households within the Nodes to build a new home, or reuse and adapt an existing structure, in proximity to their family home, as well as support rural-generated dwellings for members of the rural community of the area as an alternative to one-off housing in the countryside.	
<b>Chief Executive's Recommendation</b>	
No change recommended.	

<b>Submission No.(s):</b>	MH-C5-825
<b>Submission by:</b>	Údarás na Gaeltachta
<b>Submission Theme(s):</b>	Chapter 9 Rural Development Strategy
<b>Summary of Submission:</b>	
<ul style="list-style-type: none"> <li>Highlights the importance Meath County Council plays in developing and preserving the Irish language and culture. The submission details the role of Údarás na Gaeltachta and refers to the Irish Language Plan for the Meath Gaeltacht which has been agreed and approved by the Minister for State for the Gaeltacht. Údarás proposes that new</li> </ul>	

<p>developments provide recognition, support and momentum to the social, cultural and language aspects of the area in question.</p> <p>The submissions seeks;</p> <ul style="list-style-type: none"> <li>○ the promotion of economic and social development in the Gaeltacht</li> <li>○ improving the standard of life for the people of Meath, including people in the Gaeltacht,</li> <li>○ protecting and promoting a high quality and distinctive heritage</li> <li>○ promoting the various strengths that different parts of the county has while developing its weaknesses.</li> </ul>
<b>Chief Executive's Response</b>
<p>The Council is committed to the protection and enhancement of the Gaeltachts ( e.g. RUR POL, 45, RUR POL 46, RUR POL 47, RUR POL 48, RUR OBJ 43 . A Language Plan will be prepared for the Limistéir Pleanála Teanga (Language Planning District) for Ráth Chairn and Baile Ghib in accordance with the Gaeltacht Act 2012. In order to ensure the development of sustainable communities, lands have been identified in Rathcairn and Bhaile Gibb to accommodate a small amount of residential housing together with employment uses. There are existing Údarás funded projects in both Baile Ghib and Rathcairn and it is an objective of the Plan in conjunction with Údarás na Gaeltachta and Gaeltacht na Mí Economic forum to continue to support economic development in the Gaeltacht areas of the County. (Please refer to Chapter 4 Economy and Employment Strategy and Volume 2 Written statements for Rathcairn and Baile Ghib).</p> <p>It is considered that the existing policy as prescribed including the requirement for a Linguistic Impact Assessment ( RUR OBJ 43 ) is sufficiently robust to ensure the protection and enhancement of the Gaeltachts unique linguistic and cultural setting.</p>
<b>Chief Executive's Recommendation</b>
No change recommended.

<b>Submission No.(s):</b>	MH-C5-855
<b>Submission by:</b>	Cllrs Sharon Keogan and Amanda Smith
<b>Submission Theme(s):</b>	Chapter 9 Rural Development Strategy
<b>Summary of Submission:</b>	
<ul style="list-style-type: none"> <li>• This submission requests that MCC adopts a resolution to support local needs rural development regardless of County boundary but within the local needs radius requirement.</li> <li>• This issue was previously raised as part of the NOMs.</li> </ul>	
<b>Chief Executive's Response</b>	
<p>The rural housing policy prescribed in Chapter 9 provides for persons who satisfy the requirements set in the schedule of Local Need (Tables 9.1 a and b refers) irrespective of County boundaries.</p>	
<b>Chief Executive's Recommendation</b>	
No change required.	

<b>Submission No:</b>	MH-C5-864
<b>Submitted by:</b>	Declan Clabby & Associates on behalf of James Magee
<b>Submission Theme(s):</b>	Rural Node Zoning, Culmullen , Chapter 9 Rural Development Strategy.
<b>Summary of Submissions:</b>	
This submission seeks the small reconciliation of rural node boundary at Culmullen.	
<b>Chief Executive's Response</b>	
Refer to response for submission MH-C5-404.	
<b>Chief Executive's Recommendation</b>	
No change recommended.	

<b>Submission No.(s):</b>	MH-C5-875
<b>Submission by:</b>	Cllr. Sharon Keogan and Amanda Smith
<b>Submission Theme(s):</b>	Chapter 9 Rural Development Strategy
<b>Summary of Submission:</b>	
This submission requests that the southern boundary of the rural node of Bellewstown is extended.	
<b>Chief Executive's Response</b>	
This issue was raised as part of the NOMS and it would appear that this is a repeat submission. The boundary of the Node was previously extended to the south as requested. It is not considered appropriate to further extend the boundary as noted in previous requests for Node extensions.	
<b>Chief Executive's Recommendation</b>	
No change required.	

<b>Submission No.(s):</b>	MH-C5-877
<b>Submission by:</b>	Cllr. Sharon Keogan and Cllr. Amanda Smith
<b>Submission Theme(s):</b>	Chapter 9 Rural Development Strategy
<b>Summary of Submission:</b>	
This submission requests the designation of Cushenstown as a Rural Node.	
<b>Chief Executive's Response</b>	
Lands are identified at Cushinstown, Ashbourne as a Rural Node.	
<b>Chief Executive's Recommendation</b>	
No change required.	

<b>Submission No:</b>	MH-C5-878
<b>Submitted by:</b>	Foster Associates on behalf of Mr Andrew

	Burke
<b>Submission Theme(s):</b>	Rural Node Zoning, Haystown & Carnuff Little and Ardmulchan, Chapter 9 Rural Development Strategy
<b>Summary of Submissions:</b>	
<p>This submission seeks lands to be considered under the Rural settlement Strategy as a Rural Node to accommodate the future needs of rural dwellers not engaged in agriculture or rural economic enterprises.</p> <p>The lands are located at Haystown &amp; Carnuff Little and Ardmulchan, Navan Folio ref MH57694F</p>	
<b>Chief Executive's Response</b>	
<p>There are currently 50 identified Rural Nodes within the Draft Plan to cater for rural generated housing need. These Rural Nodes have a strong residential focus and are based on a small number of individual houses. They provide an alternative to one-off housing in the countryside through the consolidation of rural residential development within existing small settlements. It is envisaged that for the most part, they will provide an opportunity for family members of existing households within the Node to build a new home, or reuse and adapt an existing structure, in proximity to their family home, by subdividing large sites.</p> <p>This submission along with others requests the designation of an additional Rural Nodes. The designation of additional Rural Nodes within the County would represent a piecemeal uncoordinated approach for designating land for which there is no evidence-based need.</p> <p>The quantum and location of land identified for development in the County is directly influenced by the Development Plan's Settlement and Core Strategy. Based on the evidence-based approach adopted in the Core Strategy for the County, it is clear, that Meath has a significant and sufficient quantum of land designated to meet the regional targets for the Development Plan period.</p> <p>There are lands designated in rural villages and rural nodes that are sufficient in area to accommodate local rural based housing need across the County.</p>	
<b>Chief Executive's Recommendation</b>	
No change recommended.	

<b>Submission No:</b>	MH-C5-879
<b>Submitted by:</b>	Foster Associates on behalf of Mr Andrew Burke
<b>Submission Theme(s):</b>	Rural Node Zoning, Kilberry, Chapter 9 Rural Development Strategy.
<b>Summary of Submissions:</b>	
<p>This submission seeks lands to be considered under the Rural settlement Strategy as a Rural Node to accommodate the future needs of rural dwellers not engaged in agriculture or rural economic enterprises.</p> <p>The lands are located at Kilberry Folio ref MH62447F.</p>	
<b>Chief Executive's Response</b>	
There are currently 50 identified Rural Nodes within the Draft Plan to cater for rural generated housing need. These Rural Nodes have a strong residential focus and are based on a small	



number of individual houses. They provide an alternative to one-off housing in the countryside through the consolidation of rural residential development within existing small settlements. It is envisaged that for the most part, they will provide an opportunity for family members of existing households within the Node to build a new home, or reuse and adapt an existing structure, in proximity to their family home, by subdividing large sites.

This submission along with others requests the designation of an additional Rural Nodes. The designation of additional Rural Nodes within the County would represent a piecemeal uncoordinated approach for designating land for which there is no evidence-based need.

The quantum and location of land identified for development in the County is directly influenced by the Development Plan's Settlement and Core Strategy. Based on the evidence-based approach adopted in the Core Strategy for the County, it is clear, that Meath has a significant and sufficient quantum of land designated to meet the regional targets for the Development Plan period.

There are lands designated in rural villages and rural nodes that are sufficient in area to accommodate local rural based housing need across the County.

#### **Chief Executive's Recommendation**

No change recommended.

<b>Submission No:</b>	MH-C5-887
<b>Submitted by:</b>	Shay Scanlon Architects on behalf of Patrick Swan
<b>Submission Theme(s):</b>	Rural Node Zoning, Curragh, Chapter 9 Rural Development Strategy
<b>Summary of Submissions:</b>	
<p>This submission seeks to extend the lands designated within the rural node at Curragh. The lands are currently unzoned.</p> <p>The current settlement at Curragha consists of a main street/road running from South to North to the crossroad. The street/road is fronted with private houses, the School, Church, Graveyard, Tennis Club, local Convenience Shop and Public House. A Later road running parallel to the main street/road was developed to the West with a row of housing backing on to the original. The lands to the East, the subject of this submission, again run in a linear fashion and parallel to the main street/road, these are ideally located to provide a coherent and consolidated extension of the Rural Node. A new entrance road, footpath and street lighting have been provided by the landowner as a result of the recent small development of four houses to the North East of the lands.</p> <p>The lands can be developed in phased housing clusters to meet demand and allow for organic growth. Over time the establishment of a Village Green open space amenity area can be developed providing accessible, centralised and secure play areas and play grounds. A suitable design footpath and cycle route network can be provided to link the old and new and access the school and church without the need to go via the existing public roads.</p>	

The lands are ideally located for such expansion of the node and can facilitate phased, sustainable and orderly development, providing the appropriate community facilities and public amenity need for a Rural Node such as Curragha.

#### **Chief Executive's Response**

There are currently 50 identified Rural Nodes within the Draft Plan to cater for rural generated housing need. These Rural Nodes have a strong residential focus and are based on a small number of individual houses. They provide an alternative to one-off housing in the countryside through the consolidation of rural residential development within existing small settlements. It is envisaged that for the most part, they will provide an opportunity for family members of existing households within the Node to build a new home, or reuse and adapt an existing structure, in proximity to their family home, by subdividing large sites.

This submission along with many others requests extending the boundaries of Rural Nodes. Extending rural nodes on an ad hoc basis would represent a piecemeal uncoordinated approach for designating land for which there is no evidence-based need.

The quantum and location of land identified for development in the County is directly influenced by the Development Plan's Settlement and Core Strategy. Based on the evidence-based approach adopted in the Core Strategy for the County, it is clear, that Meath has a significant and sufficient quantum of land designated to meet the regional targets for the Development Plan period.

There are lands designated in rural villages and rural nodes to accommodate local rural based housing need across the County. In this instance it is considered that the area of land already designated in Curragh contains sufficient lands to support rural-generated dwellings for members of the rural community of Curragh.

#### **Chief Executive's Recommendation**

No change recommended.

<b>Submission No:</b>	MH-C5-889
<b>Submitted by:</b>	Shay Scanlon Architects on behalf of Richard Doyle
<b>Submission Theme(s):</b>	Rural Node Zoning, Brackhall Little, Kilcloon, Chapter 9 Rural Development Strategy.
<b>Summary of Submissions:</b>	
<p>This submission seeks to extend the lands designated within the rural node at Kilcloon. The lands are currently unzoned and are located at the north western periphery of the node.</p> <p>The family farm holding and equestrian business at Blackhall little has been in the family for the past 32 years. The overall land holding extends circa 8.9 Ha.</p> <p>The family lands are in effect adjacent to the rural node as currently envisaged. The extension of the node to the family lands will avoid the necessity and expense of any of the family members needing to buy sites from a neighbouring landowner within the node.</p>	
<b>Chief Executive's Response</b>	

There are currently 50 identified Rural Nodes within the Draft Plan to cater for rural generated housing need. These Rural Nodes have a strong residential focus and are based on a small number of individual houses. They provide an alternative to one-off housing in the countryside through the consolidation of rural residential development within existing small settlements. It is envisaged that for the most part, they will provide an opportunity for family members of existing households within the Node to build a new home, or reuse and adapt an existing structure, in proximity to their family home, by subdividing large sites.

This submission along with many others requests extending the boundaries of Rural Nodes. Extending rural nodes on an ad hoc basis would represent a piecemeal uncoordinated approach for designating land for which there is no evidence-based need.

The quantum and location of land identified for development in the County is directly influenced by the Development Plan's Settlement and Core Strategy. Based on the evidence-based approach adopted in the Core Strategy for the County, it is clear, that Meath has a significant and sufficient quantum of land designated to meet the regional targets for the Development Plan period.

There are lands designated in rural villages and rural nodes to accommodate local rural based housing need across the County. In this instance it is considered that the area of land already designated in Kilcloon contains sufficient lands to support rural-generated dwellings for members of the rural community of Kilcloon.

#### **Chief Executive's Recommendation**

No change recommended.

<b>Submission No.(s):</b>	MH-C5-913
<b>Submission by:</b>	Kiltale Hurling Club
<b>Submission Theme(s):</b>	Chapter 9 Rural Development Strategy
<b>Summary of Submission:</b>	
<ul style="list-style-type: none"> <li>This submission includes a detailed written statement to support the reclassification of Kiltale in the Draft Plan as a Rural Village.</li> <li>The written statement sets out the profile of Kiltale in terms of land use, residential, retail, community, urban design, heritage, moment and access/</li> <li>The following 'Goal' for Kiltale is prescribed: <i>'To make a positive contribution to the development of Kiltale as a 'Rural Village' by the consolidation of the undefined but attractive village centre in the area of the Kiltale Graig. WE recognise the importance of conserving and enhancing the quality of Kiltale and its natural environment while most importantly catering for the needs of all sections of our community.'</i></li> <li>Strategic Policies and a zoning Map is also included.</li> </ul>	
<b>Chief Executive's Response</b>	
<p>In relation to Kiltale, its designation as a rural node addresses its importance in the context of the surrounding rural hinterland and the exiting development in this location. Having assessed this location and the surrounding settlements it has been considered that Kiltale is not appropriate for designation as a rural village. The level of growth that would be provided with a rural village is not considered appropriate in this location and if Kiltale was designated as a rural village it would be</p>	

inconsistent with the settlement hierarchy and could negatively impact on higher tier settlements in the area. Finally, there are constraints which restrict the development of Kiltale and in this regard, it is appropriately designated as a rural node which provides an alternative to one off rural housing.

#### **Chief Executive's Recommendation**

No change recommended.

<b>Submission No.(s):</b>	MH-C5-919
<b>Submission by:</b>	Cllr. Joe Fox
<b>Submission Theme(s):</b>	Chapter 9 Rural Development Strategy
<b>Summary of Submission:</b>	
<p>This submission relates generally to rural villages and the Hill of Down and requests the following:</p> <ol style="list-style-type: none"> <li>1. That an objective be included in the plan for the villages of Kildalkey, Ballivor, Rathmoyle, Summerhill and Clonard for lands to be zoned for the provision of serviced sites to cater for their rural hinterland.</li> <li>2. That an objective be included in the plan to reopen the Hill of Down Rail Station and lands identified for a park and ride at Hill of Down Rural Node.</li> <li>3. That the rural nodes be included on map 3.1</li> </ol>	
<b>Chief Executive's Response</b>	
<p>1. The merits of this proposal is noted. It is noteworthy that the current Programme for Government, refers to the 'serviced site initiative' to facilitate rural dwellers building houses close to their family home. In the event that this is implemented, the Development Plan will be varied to accommodate such a policy approach.</p> <p>2. A proposal for a park and Ride adjacent to the train station was raised as a Notice of Motion and has been included in the Draft Plan (MOV OBJ 32 refers). Meath County Council does not have a statutory function in the provision or operation of rail stations. However, the Council will liaise with Irish Rail in relation to the provision of rail services and facilitate any proposals to further improve the rail services within Co. Meath.</p> <p>3. It is proposed to illustrate all the rural nodes on a separate Map. Please refer to updated Rural Housing Policy Section (Appendix F) in this regard.</p>	
<b>Chief Executive's Recommendation</b>	
<p>No change recommended with respect to items no. 1 and 2. With respect to item no. 3, please refer to updated Section 9.5 Rural Settlement Strategy Section (Appendix F which includes a map of the rural nodes.)</p>	

<b>Submission No.(s):</b>	MH-C5-922
<b>Submission by:</b>	Hugh Morris
<b>Submission Theme(s):</b>	Chapter 9 Rural Development Strategy
<b>Summary of Submission:</b>	
<ul style="list-style-type: none"> <li>• This submission requests that the rural node of Drumbaragh be extended to the east to provide for the potential future development of sustainable housing, sensibly designed in</li> </ul>	

- the 'Clachan' tradition of clustering housing together in the modern context.
- It is submitted that the proposed site as outlined provides an ideal location for rural development of this nature.

#### **Chief Executive's Response**

There are currently 50 identified Rural Nodes within the Draft Plan to cater for rural generated housing need. These Rural Nodes have a strong residential focus and are based on a small number of individual houses. They provide an alternative to one-off housing in the countryside through the consolidation of rural residential development within existing small settlements. It is envisaged that for the most part, they will provide an opportunity for family members of existing households within the Node to build a new home, or reuse and adapt an existing structure, in proximity to their family home, by subdividing large sites.

This submission along with many others requests the extension of individual Rural Nodes. Extending rural nodes on an ad hoc basis would represent a piecemeal uncoordinated approach for designating land for which there is no evidence-based need.

The quantum and location of land identified for development in the County is directly influenced by the Development Plan's Settlement and Core Strategy. Based on the evidence-based approach adopted in the Core Strategy for the County, it is clear, that Meath has a significant and sufficient quantum of land designated to meet the regional targets for the Development Plan period.

Lands are designated in rural villages and rural nodes to accommodate local rural based housing need across the County. In this instance it is considered that the area of land already designated in Drumbaragh contains sufficient lands to support rural-generated dwellings for members of the rural community of Drumbaragh. It is noteworthy also, that there is also significant provision available within the nearby larger urban settlement of Kells.

In conclusion, there is no evidence-based need or planning rationale for the extension of rural nodes which would be in breach of the Core Strategy of the Draft Plan and the Regional Spatial and Economic Strategy and as such would be contrary to proper planning and sustainable development.

#### **Chief Executive's Recommendation**

No change recommended.

<b>Submission No.(s):</b>	MH-C5-926
<b>Submission by:</b>	Paraic O' Griofa
<b>Submission Theme(s):</b>	Chapter 9 Rural Development Strategy
<b>Summary of Submission:</b>	
<ul style="list-style-type: none"> <li>This submission writer sets out his background and involvement in the community over the past 15 years. He refers to infrastructure investment which has been secured for the area.</li> <li>The submission outlines some of the main achievements and investments made in the local community.</li> <li>The submission specifically refers to the requirement for a Linguistic Impact Study.</li> <li>It is requested the Plan the changes being proposed as part of this objective should be debated and agreed in an open forum by the whole Gaeltacht Community thereby</li> </ul>	

gaining views and opinions from a broad spectrum of the community. etc.
<b>Chief Executive's Response</b>
The existing policy prescribed is sufficiently robust to ensure the protection and enhancement of the Gaeltacht's unique linguistic and cultural setting.
<b>Chief Executive's Recommendation</b>
No change recommended.

<b>Submission No.(s):</b>	MH-C5-948
<b>Submission by:</b>	Michael Kiernan
<b>Submission Theme(s):</b>	Chapter 9 Rural Development Strategy
<b>Summary of Submission:</b>	
<ul style="list-style-type: none"> <li>• This submission requests that Drumree Rural Node be extended to include additional lands in the submission author's ownership.</li> <li>• A justification for the inclusion of the subject lands is put forward including, the location of the subject lands, the availability of services, speed limits and the fact that their inclusion would connect 2 designated areas in the Rural Node.</li> </ul>	
<b>Chief Executive's Response</b>	
<p>There are currently 50 identified Rural Nodes within the Draft Plan to cater for rural generated housing need. These Rural Nodes have a strong residential focus and are based on a small number of individual houses. They provide an alternative to one-off housing in the countryside through the consolidation of rural residential development within existing small settlements. It is envisaged that for the most part, they will provide an opportunity for family members of existing households within the Node to build a new home, or reuse and adapt an existing structure, in proximity to their family home, by subdividing large sites.</p> <p>This submission along with many others requests the extension of individual Rural Nodes. Extending rural nodes on an ad hoc basis would represent a piecemeal uncoordinated approach for designating land for which there is no evidence-based need.</p> <p>The quantum and location of land identified for development in the County is directly influenced by the Development Plan's Settlement and Core Strategy. Based on the evidence-based approach adopted in the Core Strategy for the County, it is clear, that Meath has a significant and sufficient quantum of land designated to meet the regional targets for the Development Plan period.</p> <p>Lands are designated in rural villages and rural nodes to accommodate local rural based housing need across the County. In this instance it is considered that the area of land already designated in Drumree is sufficient to support rural-generated dwellings for members of the rural community of the area.</p> <p>In conclusion, there is no evidence-based need or planning rationale for the extension of rural nodes which would be in breach of the Core Strategy of the Draft Plan and the Regional Spatial and Economic Strategy and as such would be contrary to proper planning and sustainable development.</p>	
<b>Chief Executive's Recommendation</b>	

No change recommended.
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<b>Submission No.(s):</b>	MH-C5-950
<b>Submission by:</b>	Colm Buchanan
<b>Submission Theme(s):</b>	Chapter 9 Rural Development Strategy
<b>Summary of Submission:</b>	
<ul style="list-style-type: none"><li>• This submission requests that the rural node of Boyerstown be extended to the east to include 7.97 ha.</li><li>• A justification for the inclusion of the subject lands is put forward, including that the proposed lands would assist in meeting rural housing needs in a rural area under strong urban influence, avoid overdevelopment while sustaining rural communities and support the vibrancy and sustainability of the area.</li></ul>	
<b>Chief Executive's Response</b>	
<p>There are currently 50 identified Rural Nodes within the Draft Plan to cater for rural generated housing need. These Rural Nodes have a strong residential focus and are based on a small number of individual houses. They provide an alternative to one-off housing in the countryside through the consolidation of rural residential development within existing small settlements. It is envisaged that for the most part, they will provide an opportunity for family members of existing households within the Node to build a new home, or reuse and adapt an existing structure, in proximity to their family home, by subdividing large sites.</p> <p>This submission along with many others requests the extension of individual Rural Nodes. Extending rural nodes on an ad hoc basis would represent a piecemeal uncoordinated approach for designating land for which there is no evidence-based need.</p> <p>The quantum and location of land identified for development in the County is directly influenced by the Development Plan's Settlement and Core Strategy. Based on the evidence-based approach adopted in the Core Strategy for the County, it is clear, that Meath has a significant and sufficient quantum of land designated to meet the regional targets for the Development Plan period.</p> <p>There are lands designated in rural villages and rural nodes to accommodate local rural based housing need across the County. In this instance it is considered that the area of land already designated in Boyerstown contains sufficient lands to support rural-generated dwellings for members of the rural community of Boyerstown.</p> <p>In conclusion, there is no evidence-based need or planning rationale for the extension of rural nodes which would be in breach of the Core Strategy of the Draft Plan and the Regional Spatial and Economic Strategy and as such would be contrary to proper planning and sustainable development.</p>	
<b>Chief Executive's Recommendation</b>	
No change recommended.	

<b>Submission No.(s):</b>	MH-C5-954
<b>Submission by:</b>	Francis Lynch



<b>Submission Theme(s):</b>	Chapter 9 Rural Development Strategy
<b>Summary of Submission:</b>	
<ul style="list-style-type: none"> <li>• This submission requests that the rural node of Kitale be extended to the west to include lands in the submission author's ownership.</li> <li>• It is submitted that lands were previously made available for the provision, including that the lands were previously made available for the local sewerage works.</li> </ul>	
<b>Chief Executive's Response</b>	
<p>There are currently 50 identified Rural Nodes within the Draft Plan to cater for rural generated housing need. These Rural Nodes have a strong residential focus and are based on a small number of individual houses. They provide an alternative to one-off housing in the countryside through the consolidation of rural residential development within existing small settlements. It is envisaged that for the most part, they will provide an opportunity for family members of existing households within the Node to build a new home, or reuse and adapt an existing structure, in proximity to their family home, by subdividing large sites.</p> <p>This submission along with many others requests the extension of individual Rural Nodes. Extending rural nodes on an ad hoc basis would represent a piecemeal uncoordinated approach for designating land for which there is no evidence-based need.</p> <p>The quantum and location of land identified for development in the County is directly influenced by the Development Plan's Settlement and Core Strategy. Based on the evidence-based approach adopted in the Core Strategy for the County, it is clear, that Meath has a significant and sufficient quantum of land designated to meet the regional targets for the Development Plan period.</p> <p>Lands are designated in rural villages and rural nodes to accommodate local rural based housing need across the County. In this instance it is considered that the area of land already designated in Kiltale is sufficient to support rural-generated dwellings for members of the rural community of the area.</p> <p>In conclusion, there is no evidence-based need or planning rationale for the extension of rural nodes which would be in breach of the Core Strategy of the Draft Plan and the Regional Spatial and Economic Strategy and as such would be contrary to proper planning and sustainable development.</p>	
<b>Chief Executive's Recommendation</b>	
No change recommended.	

<b>Submission No.(s):</b>	MH-C5-958
<b>Submission by:</b>	Brendan Fulham
<b>Submission Theme(s):</b>	Chapter 9 Rural Development Strategy.
<b>Summary of Submission:</b>	
<p>This submission welcomes the promotion of the Irish language in the Gaeltacht, it is suggested that the requirement for a Linguistic Impact Study to be carried out by applicants on lands owned by linear descendants of the landowner who owned land in the area prior to the Gaeltacht's being set up in the 1930s should be exempted.</p>	

It is submitted that families indigenous to the area may not be proficient in the Irish language given that the Rathcairn and Baile Ghib were only designated with Gaeltacht status in 1967.

The submission questions whether the proposed 'competent person' has any legal authority in deciding whether the applicant for planning permission has the required proficiency in the Irish language to pass the Linguistic Impact Study.

The submission refers also to the rural housing policy and makes reference to the point that in Gaeltacht areas the land commission landholdings extended to 22 acres in size.

#### **Chief Executive's Response**

The issue raised in this submission is noted and acknowledged. Where a person has strong intrinsic links to the Gaeltacht area this shall be acknowledged. In the interests of clarity, it is considered appropriate to amend RUR POL OBJ 43 in this regard.

It should be noted that the Linguistic Impact Study will form one part of the assessment process in considering planning applications in the Gaeltacht's. As stated in the policy objective the interview shall be facilitated by the Local Authority.

The size of land commission holdings in Gaeltachts is noted. However, for reasons outlined in CE's Response to grouped themed submission no. 1 'Rural Housing Policy' (referred to in Part 3 or report ) is not considered to appropriate to amend the policy in this regard.

#### **Chief Executive's Recommendation**

Amend RUR OBJ 43 as follows: Insert the following additional text at the end of the 2<sup>nd</sup> paragraph. (Insertion in bold)

The study shall be accompanied by sufficient supporting information which demonstrates how the proposal protects and enhances the distinctive linguistic and cultural heritage of the Gaeltacht. **'Where an applicant has strong intrinsic links to the Gaeltacht areas and complies with the Rural Housing Policy as set out in Section 9.5 a Linguistic Impact Study is not required.'**

<b>Submission No.:</b>	MH-C5-971
<b>Submitted by:</b>	Aidan Geraghty on behalf of John McQuail
<b>Submission Theme(s):</b>	Land Use Zoning, Grangegeeth Cross, Slane, Chapter 9 Rural Development Strategy.
<b>Summary of Submission:</b>	
This submission relates to ands located and west of the existing Node at Grangegeeth.	
It is proposed to rezone the lands from agricultural to industrial use. The proposed are bounded by a mature hedgerow to the west, south and east. Part of the original field which the site is located has been developed as part of Grangegeeth Graig.	
This is an unsewered area. Any development of these lands will require the installation of individual on site wastewater treatment, including the installation of a rainwater disposal system in accordance with BRE365.	
The proposal to rezone lands for industrial will comply with the existing development policy.	

Rural employment is vital to maintaining community structure and viability. The proposed lands are adjacent to an existing small rural industrial employment area.

At present there is no mains water supply in the area. It is proposed to provide an independent water supply to each building proposed as part of any future development lands. This supply will be taken from a central borehole as agreed with the local authority.

The present access serves 2 separate small industrial units. The existing access road located within the site will be used, this road can be extended to cater for any future development.

#### **Chief Executive's Response**

This Plan accepts that there is a need to develop the rural economy that offers a viable and sustainable employment for existing communities. There is also a need to strengthen the provision / retention of services, regenerate rural communities and promote the economic development of rural areas.

That being said, the rural area is vulnerable to overdevelopment and intensification of such uses can lead to adverse impacts on rural character as well as undermining the land use objective of the rural area which seeks to protect and promote in a balanced way, the development of agriculture, forestry and sustainable rural related enterprise, community facilities, biodiversity, the rural landscape and the built and cultural heritage.

Furthermore, as outlined in the submission, there is a severe lack of adequate services to cater for any significant expansion / designation of rural employment areas. Therefore, the careful and sustainable managed growth of established rural related enterprise will be facilitated without the requirement to designate specific land parcels for same.

In this context, it is not considered appropriate to zone the subject lands for industrial uses. However, this does not preclude the orderly / organic expansion of the existing site subject to acceptable boundary treatment, landscaping, service provision and other normal planning considerations.

#### **Chief Executive's Recommendation**

No change recommended

<b>Submission No:</b>	MH-C5-972
<b>Submitted by:</b>	McKenna & Associates on behalf of Demond and Moira Monahan
<b>Submission Theme(s):</b>	Land Use Zones, Glebe Batterstown, Chapter 9 Rural Development Strategy.
<b>Summary of Submissions:</b>	
This submission seeks the rezoning of existing unzoned lands at Collierstown / Bellewstown to A2 New Residential.	
It is submitted that this is a very appropriate site for building given it hosts good road frontage, within walking distance to the local school church pub / restaurant. There are lots of amenities close by.	
Duleek and Drogheda are close at hand with easy access to the M1 Motorway Dublin/Belfast.	

**Chief Executive's Response**

There are currently 50 identified Rural Nodes within the Draft Plan to cater for rural generated housing need. These Rural Nodes have a strong residential focus and are based on a small number of individual houses. They provide an alternative to one-off housing in the countryside through the consolidation of rural residential development within existing small settlements. It is envisaged that for the most part, they will provide an opportunity for family members of existing households within the Node to build a new home, or reuse and adapt an existing structure, in proximity to their family home, by subdividing large sites.

This submission along with many others requests extending the boundaries of Rural Nodes. Extending rural nodes on an ad hoc basis would represent a piecemeal uncoordinated approach for designating land for which there is no evidence-based need.

The quantum and location of land identified for development in the County is directly influenced by the Development Plan's Settlement and Core Strategy. Based on the evidence-based approach adopted in the Core Strategy for the County, it is clear, that Meath has a significant and sufficient quantum of land designated to meet the regional targets for the Development Plan period.

There are lands designated in rural villages and rural nodes to accommodate local rural based housing need across the County. In this instance it is considered that the area of land already designated in Bellewstown contains sufficient lands to support rural-generated dwellings for members of the rural community of the area.

**Chief Executive's Recommendation**

No change recommended.

<b>Submission No.(s):</b>	MH-C5-979
<b>Submission by:</b>	Kildalkey Hurling and Camogie Club
<b>Submission Theme(s):</b>	Chapter 9 Rural Development Strategy
<b>Summary of Submission:</b>	
<ul style="list-style-type: none"><li>• This submission outlines serious concerns in relation to the Rural Housing Policy.</li><li>• It reiterates many of the issues outlined in the group themed rural housing policy submission (outlined above), including<ul style="list-style-type: none"><li>○ adverse impact on the club,</li><li>○ population decline</li><li>○ rural depopulation.</li><li>○ The requirement to have 25 acres which is considered to be discriminatory.</li><li>○ Housing Crisis housing costs and financial implications.</li></ul></li><li>• The insertion of a third category of Local Housing Need is requested.</li><li>• This submission also expresses concern that there is a lack of rural nodes in the Kildalkey area. The nearest node is Kilbride whereby there is little social links. Concern is expressed with regard to future planning applications and possible objections being raised by the local community of Kilbride.</li><li>• It is submitted that neither Ballinlough or Kildakey have rural nodes. 8 additional rural nodes are requested to be reviewed on an annual basis.</li></ul>	

- Specific reference is also made to Section 9.15 family flat extensions in rural areas. It is considered that this policy should be encouraged rather than restricted in the Draft Plan. It is requested that this policy should allow for 2 bedrooms extensions unrestricted in size. It is submitted that this would facilitate families staying from abroad, carers where necessary and encourage the reuse of the existing housing stock.

#### **Chief Executive's Response**

Please refer to CE's response in Group themed 'Rural Housing Policy' submissions referred to above.

Many submissions request the designation of additional Rural Nodes. The designation of 8 additional rural nodes as proposed would represent piecemeal uncoordinated development for which there is no evidence-based need. Designating additional rural nodes would result in a development pattern with deficiencies in terms of the provision of basic infrastructure and public services, in addition to unsustainable travel patterns, encroachment onto and loss of valuable agricultural lands and adverse visual impact.

There are lands designated in the rural villages of Kildalkey (and Ballinlough) as well as the local rural nodes which are considered sufficient in area to accommodate the local housing needs of the community of Kildalkey.

Section 9.15 outlines the policy with regard to family flat extensions in rural areas. All such planning applications will be assessed through the Development Management Process and the relevant circumstances considered on a case by case basis. Following re-examination of this policy and consideration of the valid issues highlighted in the submission received, the CE recognises that this policy approach is overly prescriptive and restrictive in certain circumstances. Design, site coverage, soil characteristics, protection of the rural character of the area as well as the applicant's individual circumstances are key considerations in the assessment of such applications and subject to compliance with the necessary planning standards there may be instances whereby family flat extensions in excess of 1 bedroom is acceptable. It is therefore considered that this issue can be addressed and managed more appropriately through the Development Management process.

#### **Chief Executive's Recommendation**

Amend RUR OBJ 48 as follows:

All applications for family flat development shall comply with the following criteria: (bullet points 2 and 3 only to be amended as per below)

- The flat shall be modest in size. ~~and shall not have more than one bedroom (2 bedroom in exceptional circumstances).~~
- ~~The unit shall not exceed a gross floor area of 50 square metres.~~ The flat shall not have a separate access provided to the front elevation of the dwelling:

<b>Submission No.(s):</b>	MH-C5-985
<b>Submission by:</b>	Údarás na Gaeltachta (Cathal Seoige)
<b>Submission Theme(s):</b>	Chapter 9 Rural Development Strategy

**Summary of Submission:**

- Submission welcomes reference in the Plan to Gealtcht na Mi Economic Development Forum. Outlines some of the key findings of the forum report including-to further capitalise on the wealth of the Irish language, culture and heritage of this Gaeltacht community to support and progress the community and its activities.
- No outside body or organisation should be asked to complete such a linguistic impact study.
- Recommend the MCC's Irish Language Officer oversees the completion of linguistic impact studies within the county.
- It is not considered appropriate to require families/relations of residents who were in the Gaeltacht areas prior to 1935 be subject to an oral examination.

**Chief Executive's Response**

The Council is committed to the protection and enhancement of the Gaeltachts ( e.g. RUR POL, 45, RUR POL 46, RUR POL 47, RUR POL 48, RUR OBJ 43. It is considered that the existing policy as prescribed including the requirement for a Linguistic Impact Assessment ( RUR OBJ 43 ) is sufficiently robust to ensure the protection and enhancement of the Gaeltachts unique linguistic and cultural setting.

It is anticipated that the Irish Language Officer will be consulted with regard to the implementation of RURL OBJ 43-Linguistic Impact Assessments.

With respect to the final point please refer to submission no..958 and the CE's recommendation and suggested amendment in this regard.

**Chief Executive's Recommendation**

No change recommended.

<b>Submission No.(s):</b>	MH-C5-1004
<b>Submission by:</b>	Coliste na Mí
<b>Submission Theme(s):</b>	Chapter 9 Rural Development Strategy Chapter 7 Community Infrastructure Chapter
<b>Summary of Submission:</b>	
<ul style="list-style-type: none"> <li>• This submission outlines the background to the organisation as a voluntary group promoting gaelic games throughout the County.</li> <li>• The following 2 issues are highlighted: <ul style="list-style-type: none"> <li>○ Rural depopulation and</li> <li>○ Urbanisation and lack of facilities.</li> </ul> </li> <li>• In terms of rural depopulation, concern is expressed in relation to the rural housing policy and its impact on depopulation, services, schools, rural isolation and viability of local GAA clubs.</li> <li>• The submission acknowledges positive statements with regard to the rural nodes but requests clarity in this regard.</li> <li>• An amendment to the policy is requested facilitating the settlement of local people in their own local communities and in recognition of the restrictions on one off houses that</li> </ul>	

the Council will facilitate the provision of individual sites in local areas and rural nodes for local people who do not wish to live in housing estates or built up areas. Further, it is requested that MCC identify lands contiguous to villages and rural nodes where it will be permissible for local people to buy individual sites to build their own house. Such sites should be made available for people with social links to the area and an occupancy clause imposed.

- With regard to urbanisation, the GAA expresses concern with regard to the granting of planning permission without ensuring that sufficient facilities are provided. SOC POL 32 and SOC Pol 36 and SOC OBJ 9 are welcomed in this regard. It is stated that the organisation would welcome a commitment by the Council for future engagement and other local organisations to ascertain the level of need required. Support for SIA and requests that the organisation is consulted in this regard and safeguards are put in place to ensure the developers do not evade responsibilities is also expressed.

#### **Chief Executive's Response**

Meath County Council recognises the important role played by Coiste na Mí and local GAA Clubs throughout the County.

Please refers to CE's response to grouped 'Rural Housing Policy' Submissions in Part 3 of Report with respect to the issues raised in relation to rural housing.

With regard to SIA, the issues raised are noted. SIA's will be a requirement for Planning Applications in certain circumstances (SOC POL 6 refers) and this will be appropriately managed through the Development Management Process. The Council is committed to future engagement and co-operation with all clubs in the community to identify where deficiencies exist. At a local level this can take place through the Municipal District and/or as part of the preparation of the Local Area Plans.

#### **Chief Executive's Recommendation**

No change recommended.

<b>Submission No.(s):</b>	MH-C5-1007
<b>Submission by:</b>	James McNerney
<b>Submission Theme(s):</b>	Chapter 9 Rural Development Strategy
<b>Summary of Submission:</b>	
The issue raises concern in relation to Rural OBJ 47 which relates to extensions in rural areas and rural nodes. The specific issue of concern is the presumption against the size of any extension exceeding 100% of the floor area of the existing dwelling.	
<b>Chief Executive's Response</b>	
Following re-examination of this policy and consideration of the valid issues highlighted in the submission received, the CE recognises that this policy presumption against the size of rural extensions exceeding 100% of the floor area may be overly restrictive in certain circumstances. Design, site coverage, soil characteristics, protection of the rural character of the area are some of the key considerations and subject to compliance with the foregoing there may be instances whereby extensions exceeding the floor area of the existing dwelling are considered acceptable. Furthermore, the adaptation and reuse of the existing housing stock is supported in the Plan and this objective may be prohibitive in this regard. It is therefore considered that this issue can be	



addressed and managed more appropriately through the Development Management process.

#### Chief Executive's Recommendation

Amend RUR OBJ 47 as follows:

RUR OBJ 47

That all applications for residential extensions in rural areas shall comply with the following criteria:

(i.e. amend last bullet point only as follows:)

- Extensions to dwellings shall generally be subordinate to the existing structures and reflect its design, character and finishes. **Exceptions to this objective include contemporary designed extensions to small dwellings / cottages that provide and accommodate necessary additional family living / bed space with a presumption against the size of any extension exceeding 100% of the floor area of the existing dwelling.**

<b>Submission No.(s):</b>	MH-C5-1014
<b>Submission by:</b>	Val O' Brien and Associates on behalf of Johnny Burke
<b>Submission Theme(s):</b>	Chapter 9 Rural Development Strategy
<b>Summary of Submission:</b>	
<ul style="list-style-type: none"><li>• This submission requests that Kiltale Rural Node be extended to include additional lands in the submission author's ownership.</li><li>• A justification for the inclusion of the subject lands is put forward including, the availability of services and the proposals to restrict rural one off housing.</li></ul>	
<b>Chief Executive's Response</b>	
<p>There are currently 50 identified Rural Nodes within the Draft Plan to cater for rural generated housing need. These Rural Nodes have a strong residential focus and are based on a small number of individual houses. They provide an alternative to one-off housing in the countryside through the consolidation of rural residential development within existing small settlements. It is envisaged that for the most part, they will provide an opportunity for family members of existing households within the Node to build a new home, or reuse and adapt an existing structure, in proximity to their family home, by subdividing large sites.</p> <p>This submission along with many others requests the extension of individual Rural Nodes. Extending rural nodes on an ad hoc basis would represent a piecemeal uncoordinated approach for designating land for which there is no evidence-based need.</p> <p>The quantum and location of land identified for development in the County is directly influenced by the Development Plan's Settlement and Core Strategy. Based on the evidence-based approach adopted in the Core Strategy for the County, it is clear, that Meath has a significant and sufficient quantum of land designated to meet the regional targets for the Development Plan period.</p>	

Lands are designated in rural villages and rural nodes to accommodate local rural based housing need across the County. In this instance it is considered that the area of land already designated in Kiltale is sufficient to support rural-generated dwellings for members of the rural community of the area.

In conclusion, there is no evidence-based need or planning rationale for the extension of rural nodes which would be in breach of the Core Strategy of the Draft Plan and the Regional Spatial and Economic Strategy and as such would be contrary to proper planning and sustainable development.

#### **Chief Executive's Recommendation**

No change recommended.

<b>Submission No.:</b>	MH-C5-1050
<b>Submitted by:</b>	Irish Farmers Association
<b>Submission Theme(s):</b>	Chapter 4 Economy and Employment, Chapter 5 Movement Strategy, Chapter 6 Infrastructure Strategy, Chapter 8 Cultural and Natural Heritage Strategy, Chapter 9 Rural Development Strategy, Strategic Flood Risk Assessment
<b>Summary of Submissions:</b>	
<p>This submission relates to farming and the rural area. Each matter raised is addressed in turn below:</p> <ol style="list-style-type: none"> <li>1. It is noted as part of this submission that agriculture in Meath is an important part of the economy of the county and is an important part of the rural economy in the county and across the country.</li> <li>2. IFA recognises the importance of recreational routes/greenways/walkways, however, landowners are an important part of this. To date there has been a lack of consultation with landowners and this is a matter of concern. It is submitted that one government department should be responsible for these matters and not two departments as is currently the case. It is also considered that the Walks Scheme should be extended. It is submitted that landowners and the IFA should be consulted throughout the process and of preparing a greenway project.</li> <li>3. It is submitted that all efforts must be made to secure voluntary agreement with landowners with not compulsory purchase being pursued. Farmers should be provided advice at no cost and compensation provided to the landowner for any losses. A project Liaison Officer should be appointed by local authorities to address queries and concerns.</li> <li>4. It is outlined that changes to environmental requirements and best practise for farming have impacted on farms. Meeting these requirements has put strains on farms. It is submitted that any green infrastructure plan for Meath should consider the future prospects for farming as well as present conditions. Rural tourism, renewable energy , food and other alternative enterprises should also be considered.</li> <li>5. Any improvements or programmes undertaken by farmer/landowners must not lead to future national designations. This should be outlined in the development plan, the biodiversity plan and in any agreements between the landowner and the local authority.</li> <li>6. Any actions or plan for Meath must support the farming community and not impinge on their costs. Most of the changes in farming circles in recent years have been to the</li> </ol>	

benefit of rural landscapes and environment. In this regard the challenges from the county have come from other sources.

7. The development of agriculture is critical to the maintenance of a vibrant rural economy. At a time when there is much attention being paid to future under production, rising costs and the importance of local produce farming is important and must be supported.
8. The character of the rural landscape has been shaped by farming over the centuries. The addition of the Nitrates Directives and the requirement for farming to conform to good farming practices are only having effect and no further changes should be forthcoming until a full analysis of both are realised which will not be possible for a number of years.
9. Land designations or zoning restrictions should contain a minimum of restrictions to ensure continued expansion of farming. There is a concern the preservation of the landscape will have a negative impact on farming business. Agricultural zoning should be used in much of the rural area to facilitate the development of a farm.
10. On-farm diversification should be provided for including the energy sector, wind energy and other such enterprises.
11. It is submitted that public access over private lands cannot be tolerated unless agreed to by the individual landowners who have the right to receive compensation and appropriate payment for permitting such access.
12. It is noted that it is necessary to improve the frequency and reach of public transport services in the rural area. The local link evening service should be provided for 12 months of the year in each local authority area. Ridesharing, grocery delivery and taxi transportation services should be introduced for the rural areas.
13. In relation to rural roads, it is considered that the Local Improvement Scheme which was reopened in 2017 is important to help improve country roads and laneways. This scheme should be fully restored to pre-2008 levels. It is also considered that each local authority should publish their expenditure on a quarterly basis and set out their LIS awareness campaign.
14. Government departments should work with Local Authorities to develop a national strategy for rural roads. This should include additional funding.
15. It is noted that there will be increased forestry activities and that a timber transport scheme to provide additional funding to such areas should be implemented.
16. It is considered that local authorities must act to support farmers to protect waters and to compensate farmers for any loss incurred including accessing water in the control of farmers. Where farmers incur yield and income losses through compliance with regulations in the provision of water to local communities local authorities and Irish Water should provide compensation. The duplication of water quality inspections must be reviewed and eliminated. Farmers require an end to unannounced inspections and support for the Work of the ASSAP water quality programme, which works with farmers to deliver compliance on water quality matters.
17. It is considered that flooding has had a significant effect on farmers. The Minor Works Scheme to alleviate flooding is too onerous leading to a significant underspend in many local authority areas. It should be reviewed particularly as the cost benefit process does not provide for an acceptable approach to the value of agricultural lands. Ongoing funding should be made available for the maintenance of our river system to avoid the matter of flooding. The implementation of CFRAMS must be a priority with areas that have not been finalised being dealt with. Local Authorities must ensure maximum draw down of funds available in relation to such schemes.
18. Farmers and rural business need access to fibre broadband as this can make lives better, reduce costs and lessen the regulatory burden. A network is required that provides the speeds and data usage required in modern times, even during peak times. Such broadband should be affordable for all rural households with significant competition

required. In this regard, Universal Service Obligation should be maintained, the role out of the network should be simultaneous, there should be a timely completion timeline and there should be transparency in the process with pricing, timelines and roll-out plans as well as progress reports being available. In the meantime the government should provide a temporary voucher scheme while the National Broadband Plan is being rolled out.

19. In the case of housing it is considered necessary for the next generation to be able to live on family farms. It is not expected reasonable one generation of family to have to leave the family farm to live elsewhere due to planning restrictions. Those with larger farms should be given favourable consideration for more than one property for family members on the farm. Farmers are having to travel and planning restrictions considering these people as not having a housing need are impacting negatively upon these farmers. Farmers are better off living on the land to tend to the farm as well as elderly family members. Housing should not be restricted due to green belts and it is essential that the farming community is allowed to flourish. For farming to continue and thrive farmers should be allowed to build dwellings for themselves and family members on their lands. It is submitted that each case should be considered on its merits. The requirement to have a minimum amount of land to apply for planning permission has no regard to smaller owned plots of land that may be close leased, rented etc. or separated but intrinsic to the family farm. It is considered that the sterilization of land should have a minimum period as well as a period for review.
20. Farmers are important to keeping rural areas litter free. This work, however, is challenged by the practise of fly-tipping, littering and serial dumping. Litter legislation which places a burden on farmers and homeowners to clean up reckless dumping must be amended. An Garda Síochána and the data Protection Commissioner must resolve existing issues, which prevent data sharing where CCTV cameras are used to deter criminal activity and illegal dumping. Improved by-laws should be introduced to provide greater fines. County Council should also have to provide monthly reports on anti-dumping enforcement actions and prosecutions. County Council's should be required to provide civic amenity sites including skips on the outskirts of all towns and villages to allow citizens to safely dispose of waste.

#### **Chief Executive's Response**

1. This comment is noted and welcomed. Meath County Council agree that farming is an important part of the economy of the county. This is reflected in Section 9.6 of the Draft Plan as well as being outlined in relation to Rural Economy which is addressed as part of Section 4.11 of Chapter 4 Economy and Employment Strategy.
2. In the preparation of any greenway project to date Meath County Council has undertaken public and stakeholder consultation. It is intended that this will continue to be the case on future projects. It is noted as part of ED OBJ 76 and MOV OBJ 30 of the Draft Plan that sustainable medium and long distance walking routes as well as greenways will be explored, however, the details of this will be a matter to be addressed after the new development plan comes into effect. In relation to one government department being responsible for the delivery of walking routes and greenways it is noted that this is not a matter that can be addressed as part of the review of the county development plan. Such a matter would be for the current government to consider. In relation to the Walks Scheme being expanded this would also be a matter for the relevant department, which at this time is the Department of Rural and Community Development.
3. In relation to the provision of walking routes it should be noted that HER OBJ 46 of the Draft Plan seeks to provide negotiated access to lands using permissive access agreements, where appropriate and feasible, in order to provide public access to lands for public amenity purposes. MOV OBJ 31 notes that where necessary that the

Compulsory Purchase Order process may be used for the delivery of greenways, however, it would preferable for this process not to be used in the delivery of such projects and Meath County Council will endeavour to agree negotiated access wherever possible.

4. As noted in the response to EMRA (MH-C5-60) Meath County Council intend to utilise the Guiding Principles for the preparation of Green Infrastructure strategies set out in Chapter 7 of the RSES. In relation to the potential diversification of rural farms/enterprises it should be noted that rural tourism, renewable energy, food and other alternative enterprises are supported through RUR OBJ 9 which seeks to develop sustainable and economically efficient rural economies through initiatives to enhance sectors and diversification. As such it is considered that this matter is sufficiently addressed in the Draft Plan.
5. In relation to the designation of sites, it should be noted that National Parks and Wildlife Service are responsible for the designated sites identification process and as such this is not a role for the local authority. This is, therefore, not a matter that can be addressed as part of the Draft Plan. In relation to this process of designating sites Meath County Council have noted as part of HER POL 34, the Council will abide by the legal requirements of Irish and national legislation in relation to this matter and it is considered appropriate that such a provision is included in the Draft Plan.
6. As outlined above farming is noted as being an important part of the rural economy and as such Meath County Council will continue to support this sector. It is noted that there is a balance to be struck between the designation of sites and landscapes for protection and the required operations of farmland. As noted in this submission the protection of designated sites and landscapes is in line with national and European policy/legislation and as such it is not possible for Meath County Council to prioritise agriculture uses over the protection of the environment. As noted above it is considered that the policies outlined in Chapter 4, Economy and Employment Strategy, Chapter 8 Chapter 8 Cultural and Natural Heritage Strategy and Chapter 9 Rural Development Strategy promote agricultural development whilst providing an appropriate balance between economic development and environmental protection.
7. As noted above Meath County Council agree that the role of farming in the rural economy is important and this is reflected in Section 9.6 of the Draft Plan as well as being outlined in relation to Rural Economy which is addressed as part of Section 4.11. Matters in relation to production, costs and the prioritisation of local produce are matters that cannot be appropriately addressed in detail as part of the development plan review and appropriate support for farming as well as the rural economy has been outlined as part of the abovementioned sections.
8. The restrictions noted as part of these points relate to government schemes addressed by the Department of Agriculture, Food and the Marine as well as the directives issued by the European Union (EU). As such the review of the development plan is not an appropriate place to address these matters.
9. As noted above the designation of landscapes or sites for protection is in line with number of pieces of national and EU legislation. In this regard Meath County Council have an obligation to comply with this legalisation and the protection of these sites as noted above. In relation to rural zoning it should be noted that the areas outside of settlements is zoned as a Rural Area in the Draft Plan with a list of permissible uses outlined as part of Section 11.16.7, Chapter 11 Development Management Standards and Land Use Zoning Objectives. In this regard, uses noted as part of this submission are permissible in principle subject to normal planning considerations. As such this matter has been addressed as part of the Development Plan.
10. As noted in the response to point 4 above this matter has been addressed as part of the Draft Plan.

11. The provision of public access to specific locations is addressed in several places throughout the Draft Plan across Chapter 8 Cultural and Natural Heritage Strategy and Chapter 9 Rural Development Strategy. In this regard, it is again noted that HER OBJ 46 of the Draft Plan seeks to provide negotiated access to lands using permissive access agreements, where appropriate and feasible, in order to provide public access to lands for public amenity purposes and as such this matter has been adequately and appropriately addressed as part of the Draft Plan.
12. With regard to the providing additional public transport for rural areas the Council does not have a direct role in the provision of public transport services. However, it actively promotes and facilitates the improvement of both bus and rail services both within and from Co. Meath and is committed to working in conjunction with all transport providers and stakeholders in terms of the delivery of a reliable, accessible and integrated transport network that supports the effective functioning of the county.

The Draft Plan includes MOV POL 8 as follows, *'To co-operate with the NTA and other relevant agencies to have ongoing reviews of the network of bus routes in Meath, and to support and encourage public transport operators to provide improved bus services in, and through, the County.'*

13. With regard to the Local Improvement Scheme it is noted that this scheme is managed by the Department of Rural and Community Development and as such it is not a matter for the Draft Plan to address the increase of funding through this scheme. In relation to the publication of funding through this scheme it should be noted that this is published by the Department of Rural and Community Development and the publication of such data would be a matter for this Department to address,
14. The maintenance and improvement of roads is addressed as part of MOV OBJ 42 of the Draft Plan where it is specifically noted that such works will be funded as part of the Council's Annual Roadwork's Programme funded from the Council's own resources and State Agency grants. Whilst the Draft Plan supports this approach it should be noted that the details of the Council's Annual Roadwork's Programme will be addressed by the Transportation Department of Meath County Council and this matter is not addressed as part of the development plan review.
15. As part of the Draft Plan ED POL 19 seeks to support and facilitate forestry as well as other forms of sustainable rural enterprises. It is not, however, possible as part of the Draft Plan to provide a specific timber transport programme and this would have to be addressed by national government funding, which cannot be committed as part of the Draft Plan.
16. Matters relating to the provision and treatment of water are addressed by Irish Water and as such Meath County Council is not in a position to provide policies, objectives or commitments of compensation for any matters relating to water provision. The undertaking of inspections relating to water is a matter for other authorities such as Irish Water and the Environmental Protection Agency and in this regard, it is not possible to address the matter as part of the development plan.
17. In relation to the Minor Works Scheme, it should be noted that this is an Office of Public Works scheme and as such any amendments to the criteria for this scheme, including drawing down funds from same cannot be amended as part of the Draft Plan. As part of the Draft Plan, INF POL 27, Meath County Council will liaise with the Office of Public Works in relation to proposed developments in the vicinity of drainage channels and rivers for which the Office of Public Works are responsible, prior to the making of determinations/assumptions on surface water management proposals. In relation to CFRAMS the implementation of this scheme is supported by Meath County Council as part of the INF POL 25 and INF POL 26. This programme is managed by the Office of Public



Works and Meath County Council are committed to assisting in implementing this programme. Policies and objectives such as those noted above are included in the Draft Plan, which will assist in alleviating flooding issues as much as possible, as requested in the subject submission.

18. In relation to the provision of broadband, this has been addressed as part of Section 6.16 of the Draft Plan. As noted in the Draft Plan the provision of broadband will be addressed as part of the implementation to the National Broadband Plan. The policies and objectives related to Section 6.16 note that Meath County Council will support and facilitate the delivery of broadband and ICT infrastructure. Matters such as the cost, quality, availability, data usage, interim measures and Universal Service Obligations can only be addressed at a national level and cannot be detailed in the county development plan.
19. Please refer to Part 3 of the Chief Executive Report which addresses grouped themed submission, specifically grouped themed submission no. 1 which relates to rural housing policy. In relation to sterilization agreements, it is not current planning practice to condition such agreements as part of planning application conditions and it is not necessary to provide a policy/objective to address this as part of the Draft Plan.
20. Section 6.18 of the Draft Plan addresses litter management. As part of this section it is noted that each Local Authority is obliged to prepare a Litter Management Plan for its area and such a plan is the role of the Environment Department. In this regard, matters relating to litter should be addressed by the Environment Department outside of consideration of the Draft Plan, as litter management plans are prepared more regularly than development plans.

#### **Chief Executive's Recommendation**

No change recommended

<b>Submission No.:</b>	MH-C5-1755 (MH-C5-992)
<b>Submitted by:</b>	Maynooth Mission to China
<b>Submission Theme(s):</b>	Chapter 9 – Rural Development Strategy
<b>Summary of Submission:</b>	
<p>This submission relates to Dalgan Park which is located off the R147 to the south of Navan within the Rural Area (R/A). The submission outlines the history of the Dalgan Park Campus and the different uses of the lands which include agriculture, offices, nursing home, religious as well as educational. It is stated that the Columban's similar to other religious organisations are experiencing falling numbers and are engaged in an intensive plan to secure the future legacy of their works. The submission outlines the uses which would be appropriate for the buildings onsite which includes nursing home, hotel, third level education campus, research and development facility and commercial offices.</p> <p>The submission requests that a specific objective is included in the Draft Plan as follows;</p> <p>It is an objective of MCC to promote the sustainable use and further development of the Dalgan Park Campus, compatible with existing and established uses which include educational, residential, commercial office, medical, leisure, institutional, tourism and agricultural uses; and future uses which could include an expansion of the office use or an hotel. The approach seeks, in relation to existing and new development, to protect the heritage, cultural and historical</p>	



attributes of the Dalgan Park Campus and to ensure the retention of public access. The objective seeks to promote the reuse, expansion and adaptation of existing buildings within the Campus, and to provide suitable future accommodation for the Columban Missionaries’.

#### **Chief Executive’s Response**

The significance of the Dalgan Park Campus to the county is recognised by the Council however it is not considered appropriate or possible to mention every development, campus or attraction as part of a Development Plan simply due to the scale of County Meath and the number of historic features/attractions that exist. It is however noted that Dalgan Park contains a number of important heritage buildings and is subject to a number of permitted uses. The redevelopment/re-use of the existing buildings for new uses will be assessed at Development Management stage and as per Section 11.16.6 ‘Relaxation of Zoning Objectives for Protected Structures’ certain relaxations can be applied. While it is noted that Dalgan Park is located in the Rural Area the Council recognises the scale of the buildings and the range of permitted uses onsite and the re-use of these buildings would be supported by the Council, subject to normal planning considerations.

#### **Chief Executive’s Recommendation**

No Change Recommended

<b>Submission No.(s):</b>	MH-C5-1776
<b>Submission by:</b>	John O’ Brien
<b>Submission Theme(s):</b>	Chapter 9 Rural Housing Strategy Chapter 8 Built and Natural Heritage Chapter 5 Movement Strategy
<b>Summary of Submission:</b>	
<ul style="list-style-type: none"> <li>• All residents in the countryside, whether involved in farming or not, should be given a freedom to build a home in the place they have grown up</li> <li>• One off house should be less obtrusive a unique in personality ad a more uniform rural style should be adopted.</li> <li>• The Council should enforce more Whitethorn and other native small tress and replacement roadside boundaries.</li> <li>• The Council should also consider encouraging the farming community to reinstate the vast amounts of lost hedgerows across Meath County Council.</li> <li>• The free and easy use of Glyphosate is another threat to our health, and the health of our biodiversity, certain produces are destroying our hedgerows when they accidentally drift upon them. Council should never use such produces.</li> <li>• Farmers should be reminded of the importance our land lore.</li> <li>• Hedge cutting needs to be examined also as may contractors are unaware of the bad effects of overcutting hedges. Roadside trees also under treat.</li> <li>• The bus service needs to be improved too as the route from Bailieborough to Kells is far to sparse. A more regular bus would bring more tourism to our villages.</li> <li>• The Council should maximise the benefits of archaeological finds which could attract tourism.</li> </ul>	
<b>Chief Executive’s Response</b>	
With respect to rural ‘one off housing’ please refer CE’s response to grouped themed ‘rural	

housing policy' submissions in Part 3 of Report.

The Draft Plan contains a number of policies and objectives to support the sustainable management of Meath's hedgerow resource (HER POL 37, HER POL 38, HER POL 39, HER OBJ 58, RUR POL 35 refers).

Hedgerows are an important visual feature in the landscape and form part of the historical and archaeological heritage of the county and form part of our Green Infrastructure network. They also serve a number of very important environmental and biodiversity functions. The Department of Agriculture, Fisheries, Food and the Marine (DAFFM) have designated hedgerows, ditches and open drains as Landscape Features under the Good Agricultural and Environmental Condition (GAEC) of Cross Compliance. Under GAEC 7 beneficiaries are obliged to retain and maintain designated landscape features. Landscape features are eligible for payments under the Basic Payment Scheme and other area-based schemes. In addition, Field boundaries such as hedgerows, stone walls and clay banks are afforded protection under the Environmental Impact Assessment (Agriculture) Regulations (EIA) S.I. 456 of 2011 (as amended by S.I. No. 142 of 2013 and S.I. No. 407 of 2017). Any proposed land restructuring works may require screening and approval by the Department of Agriculture, Food and the Marine under the EIA regulations. Where hedgerow removal has been deemed to have occurred in breach of EIA screening requirements land will be subject to inspection by the DAFFM and reinstatement and / or mitigation works will be required and enforced, and prosecution may occur.

A key action of the recently adopted *Climate Action Strategy 2019-2024* is to '*To engage with the agricultural community to understand how the local council can support resilience efforts and sustainable farming practices*'. Meath County Council run a number of biodiversity awareness events every year through the implementation of its County Biodiversity Plan and County Heritage Plan Programme.

Meath County Council became a partner to the All-Ireland Pollinator Plan in late 2019. The All Ireland Pollinator Plan is a very successful initiative of the National Biodiversity Data Centre, supported by government, state bodies, transport authorities, charities/NGOs, Local Authorities, Leader Companies, Community Groups, Businesses <http://pollinators.ie/partners/>. As part of our partnership agreement Meath County Council commits to consider the evidence-based actions in the guideline document *Councils: Actions to help Pollinators*, and to carry out one pollinator-friendly action in the first year of signing up and plan to carry out at least three more within the following five years. The guideline document lists 30 possible actions, many of which are low cost or cost-neutral <http://pollinators.ie/councils/> -and includes actions on reducing the use of pesticides. Meath County Council will update the All-Ireland Pollinator Plan Team (within the National Biodiversity Data Centre) on the positive pollinator actions we have planned, implemented or maintained at the end of each year.

The Council does not have a direct role in the provision of public transport services. However, it actively promotes and facilitates the improvement of both bus and rail services both within and from Co. Meath and is committed to working in conjunction with all transport providers and stakeholders in terms of the delivery of a reliable, accessible and integrated transport network that supports the effect functioning of the county.

The Draft Plan includes MOV POL 8 as follows, '*To co-operate with the NTA and other relevant agencies to have ongoing reviews of the network of bus routes in Meath, and to support and encourage public transport operators to provide improved bus services in, and through, the County*'.

A well-resourced County Museum would be a significant contribution to the cultural infrastructure of Meath. The establishment of a museum would need to be considered within the context of establishing a museum service in the county and would require the consideration of a number of factors including (but not limited to): initial capital investment, on-going operational costs, staffing, collections and care of collections, storage, outreach and education, the building (and environmental conditions and considerations). It is an action of the County Meath Heritage Plan 2015-2020 to 'Support a feasibility study on the provision of a county museum in consultation with national and local stakeholders and explore the development of a virtual (online) museum' (Action 5.7).

**Chief Executive's Recommendation**

No change recommended.

# Chapter 10

## Climate Change Strategy

<b>Submission No.:</b>	MH-C5-28
<b>Submitted by:</b>	Dept. of Communication, Climate Action and Environment
<b>Submission Theme(s):</b>	Climate Action
<b>Summary of Submission:</b>	
<p>The submission from the DoCCA and GSI support the use of the Geological Survey Ireland's (GSI) data in the Strategic Environmental Assessment Report accompanying the Draft Development Plan and had the following comments:</p> <ul style="list-style-type: none"> <li>• GSI were pleased to see the County Geological Sites were included in the Draft Plan and were included as a policy item (HER POL 46)</li> <li>• Submission recommended using GSI's National Aquifer and Recharge Maps to identify areas for integrated constructed wetlands</li> <li>• Submission recommends taking geohazards into consideration (e.g landslides), when developing areas where risks are prevalent, and using GSI data when doing so.</li> <li>• Submission recommends use of the Geothermal Suitability Maps on the GSI website to determine the most suitable type of ground source heat collector for use with heat pump technologies.</li> <li>• GSI highlights the consideration of mineral resources and potential resources as a material asset which should be recognised in the environmental assessment process, advice on which is available on the GSI Map Viewer website.</li> </ul>	
<b>Chief Executive's Response</b>	
<p>The comments from DoCCA are noted. The GSI has been used in the preparation of the Strategic Environmental Assessment of the Draft Plan and will also be used to inform the preparation of the Local Area Plans in Meath over the lifetime of this Plan.</p>	
<b>Chief Executive's Recommendation</b>	
No changes recommended	

<b>Submission No.:</b>	MH-C5-62
<b>Submitted by:</b>	Lightsource BP
<b>Submission Theme(s):</b>	Climate Change & Rural Development Strategy
<b>Summary of Submission:</b>	
<p><b>Renewable Energy</b></p> <ol style="list-style-type: none"> <li>1. This submission by Lighthouse BP believe INF OBJ 28 is overly restrictive and should instead state "To ensure that proposals for the development of essential infrastructure such as transformers, inverters, battery storage units and substations on solar farms are not located within areas identified as being within Flood Zones A and B as per the Planning System and Flood Risk Management Guidelines 2009 for Planning Authorities (or any updated guidelines)'</li> <li>2. The Plan mentions solar as a form of passive or active heating. Utility scale solar farms do not generate heat and instead generate electricity. This should be amended to give solar farms a similar standing as wind or wave.</li> </ol>	

### Rural Development Strategy

3. Submission welcomes the manner in which the Planning Department has included renewable energy projects as a form of farm diversification and requests that Chapter 9 should include a policy directly for renewable energy similar to policy RUR POL 24 on equine industry as follows:

*'To promote the farm diversification activities that include the renewables industry in the County such as solar farms'.*

Lightsource BP are of the view that objective RUR OBJ 8 is confusing and potentially contradictory, as it *'seeks to support and protect existing rural economies such as valuable agricultural lands to ensure sustainable food supply....'*, whilst at the same time promotes objectives to *'maximise opportunities in emerging sectors, such as agri-business, renewable energy'*. We would have concerns that such an objective could be used to prioritise land for food supply over land to be used as a solar farm (with sheep farming).

### Chief Executive's Response

1. The Chief Executive agrees that solar panels are not particularly vulnerable to flooding but that the required ancillary electrical infrastructure is considered a vulnerable type of development. Notwithstanding this, the placement of panels in an area of flood risk must be assessed against their potential to increase the risk of flooding upstream or downstream of the area, through changes to infiltration rates/storage capacity, through obstructing flow, or by increasing run-off. It is therefore considered appropriate that any development located in an area of flood risk is assessed in accordance with the Flood Risk Guidelines to consider indirect flood impacts.

Notwithstanding this, it is agreed that solar farms should not be prohibited from being located in Flood Zones A or B, provided they can satisfy the justification test criteria in a Site Flood Risk Assessment. Accordingly, INF OBJ 28 will be amended to reflect this.

2. This point is noted and Section 6.15.3 will be amended to reflect the capacity of solar power to generate electricity.
3. It is the overarching aim of RUR OBJ 8 to support the rural economy through promoting existing uses and diversifying where opportunities emerge. It is agreed that RUR OBJ 08 specifically refers to arable farming over alternative types of farming such as pastoral. However, it is not considered that the objective adds greater priority to food supply over alternative land-use opportunities. Nonetheless, it is considered appropriate to clarify this objective for the avoidance of uncertainty in its interpretation.

### Chief Executive's Recommendation

1. Amend INF OBJ 28 as follows:

*"To ensure that proposals for the development of solar farms are not located within areas identified as being within Flood Zones A and B **are subject to a Site Specific Flood Risk Assessment** as per the Planning System and Flood Risk Management Guidelines 2009 for Planning Authorities (or any updated guidelines)"*

2. Amend section 6.15.3, page 210 as follows:

The potential feasible renewable energy options for the County include, but are not limited to, a balanced mix of:

- Bioenergy - crops, forestry;
- Biomass - anaerobic digestion, combined heat and power (CHP);
- Geothermal - hot dry rock reservoirs, groundwater aquifers;
- Hydro energy - small and micro hydro systems;
- Solar - **electricity generation**, passive solar heating, active solar heating;
- Waste - landfill methane gas collection;
- Wave - wave action, and;
- Wind - onshore wind, offshore wind (single turbines and groups).

3. Amend RUR OBJ 8 as follows:

~~To identify and provide policies that recognise the contribution that small towns, villages, nodes and rural areas contribute to social and economic wellbeing. As part of this policy provision that seeks to support and protect existing rural economies such as the valuable agricultural~~ **industry and forestry enterprise** ~~lands to ensure sustainable food supply, and to support the diversification of rural economies to create additional jobs and maximise opportunities in emerging sectors, such as agri-business, renewable energy and tourism while protecting the value and character of open countryside.~~  
~~. and forestry enterprise.~~

<b>Submission No.:</b>	MH-C5-83
<b>Submitted by:</b>	Christopher O'Rourke Spatial Planner on behalf of the Reddan Family.
<b>Submission Theme(s):</b>	Chapter 10 Climate Change
<b>Summary of Submission:</b>	
<p>The submission relates to Bettystown however it states would be applicable in the rest of the county. The submission relates to the area from the Nanny to the Boyne and those affected by the problems arising from climate change, the issues of falling tourist numbers, car parking, commuting and the local housing.</p> <p>The NPF targets at least 40% of all new housing to be delivered within towns and villages. It is stated that the area is only getting 20% of the tourists it should be, with over 90% of the population commuting to work mostly in Dublin.</p> <p>The submission states that the list of solutions which are all interconnected are as follows:</p> <ul style="list-style-type: none"><li>• Develop housing and work life balance solutions.</li><li>• Develop by planning gain or other methods, grant aid etc, hot desk and business development units approx. 30 and similar around the country and get rid of 75% of the commute.</li><li>• Open Bettystown railway station.</li><li>• Provide major bus and car parking areas with electric charging points and CCTV cameras</li></ul>	



- 2,000 spaces Laytown with a beach parking element.
- Bettystown 2,500 car and bus parking on and off beach parking with charging points and CCTV cameras (approx. 500 of these allocated for the new Bettystown Railway Station).

### **Climate change**

Due to rising sea levels and storm surges, the author has observed erosion on a daily basis and noted in the last 48 months a more rapid rate than in the last 10 years. These areas are not just located in a special protection area but relate to areas outside properties that have been washed away. The submission states that we are now at the stage of permanent urgent action or costs due to erosion will increase by 50% per year. The submission states that as a matter of urgency, we have to deal with climate change issues.

### **Chief Executive's Response**

The County Council is committed to improving public transport opportunities in Meath and achieving a greater work live/work community thereby reducing the unsustainable commuting patterns currently faced by residents within the County. The Draft Plan also supports the facilitation of more flexible study and working arrangements as well as the creation of working hubs.

The Draft Plan supports both the provision of a train station at Bettystown as part of the DART expansion works and further supports the provision of a car parking facility at laytown Trains Stations (BLMD OBJ 6 and 7 refers) Open Bettystown railway station.

The provision of electric charging points as part of existing and future car park proposals.

### **Climate Change**

The protection of the coastline of Meath is covered within this Draft Plan as follows:

INF OBJ 32: *"To identify, prioritise and implement necessary coastal protection works subject to the availability of resources, whilst ensuring a high level of protection for natural habitats and features, and to ensure due regard is paid to visual and other environmental considerations in the design of any such coastal protection works. This will include the identification of coastal areas sensitive to climate change and consequent coastal erosion".*

There are also many actions within Meath's Climate Action Strategy to mitigate and adapt to coastal erosion and sea level rise as outlined below.

P11.1 *"Survey our natural coastal defences with a view to maintaining and enhancing coastal defences to increase resilience to climate change."*

P11.5 *"To undertake a risk assessment along the coastal areas to inform sustainable settlement patterns and reduce the impact coastal erosion."*

These actions are incorporated by way of INF POL 45 into the Draft CDP which implements and support Meath's Climate Action Strategy. Since the publication of this Draft CDP the Meath Climate Action Strategy has been adopted. This will be updated in the Draft Plan.

### **Chief Executive's Recommendation**

Amend section 6.14.2, page 208 as follows:

*"In the specific context of climate change RPO 7.29 refers to the preparation of a greenhouse gas inventory for the region to inform the preparation of a strategic mitigation action plan. RPO 7.31 requires Local Authorities to develop Climate Action Strategies (CAS) as well as local climate*

*adaptation and mitigation strategies. The Meath Climate Action Strategy is ~~at an advanced stage of preparation and is due to be published in Q3 2019~~ was adopted in September 2019."*

<b>Submission No.:</b>	MH-C5-126
<b>Submitted by:</b>	Friends of the Irish Environment
<b>Submission Theme(s):</b>	Strategic Environmental Assessment, Chp 10 Climate Change
<b>Summary of Submission:</b>	
<p><b>1. SEA</b></p> <p>In the SEA, it is noted that all three of the alternative scenarios for the future development of County Meath are judged to be negative in respect of climate change. There are no meaningful mitigation measures included in the SEA, or incorporated in the Draft MCDP, to overcome the negative impacts arising from transport emissions.</p> <p><b>2.</b> Policy Objectives SLN OBJ 7 (Slane Bypass) and CAR OBJ 7 (Carlanstown Bypass) have been assessed in the SEA against Strategic Environmental Objective CC_1. It is concluded that they will both have a negative impact on minimising the contribution to climate change i.e. they will increase greenhouse gas emissions. Additionally, these objectives are also adjudged to have an adverse impact on air quality, noise and biodiversity.</p> <p><b>3.</b> Article 17 of the SEA Regulations 2004 (S.I. No. 435/2004) require the Planning Authority to monitor the significant environmental effects of the implementation of the Draft MCDP in order to identify, at an early stage, any unforeseen adverse effects and to facilitate appropriate remedial action. The SEA monitoring measures in respect of climate change include a target to: "Promote minimisation of greenhouse gas (GHG) emissions to the atmosphere" (p.159). This target to minimise emissions is again contrary to national legislation which explicitly requires that emissions be reduced. It is simply not open to Meath County Council to proceed with the current development strategy in the knowledge that there will be a foreseen increase in greenhouse gas emissions.</p> <p><b>4.</b> In respect of climate change, it is proposed that: "Initial monitoring to commence within two years of adoption as part of the Chief Executive's Report on progress (subject to available resources)" (p.159). This equivocal statement does not reach the legal threshold for early and effective monitoring of environmental impacts required by legislation. There is also no explanation provided as to how indicators are to be measured, how reductions are to be achieved and who is supposed to verify progress in relation to those indicators or what effect any monitoring (even if it does occur) will have to mitigate or ameliorate those effects.</p> <p><b>5.</b> Similar objections can be made to other monitoring measures set out in Table 10.1. For example, in respect of Biodiversity, the target is to "Improve / conserve and protect all designated sites and species within and adjacent to the Plan Site." The indicator or this target is: "Number and extent of Protected Sites" which says absolutely nothing at all about the qualitative status of the protected sites.</p> <p><b>6.</b> Section 15 of the Climate Action &amp; Low Carbon Development Act 2015 and Section 10(2)(n) of the Planning &amp; Development Act 2000 (as amended) obliges the policies and objectives of the Draft Meath County Development Plan (MCDP) 2020 – 2026 to reduce greenhouse gas emissions by at least 40% by 2030, compared with 1990 levels, in line</p>	

with the headline target as set out in the National Mitigation Plan 2017 and the National Transition Objective.

Section 10.5 of the Draft MCDP includes a series of policies which purport to “facilitate measures which seek to reduce emissions of greenhouse gases” by 33% by 2020 (?) and by at least 40% by 2030 (p.347). Each of the policies included thereafter are highly aspirational and do not amount, in any meaningful way, to concrete strategy to rapidly de-carbonise County Meath in line with national law

## **7. Core Strategy**

The High Court has very recently ruled that maximum quantum of housing units allocated to specific settlements in the Core Strategy is binding on a Planning Authority and that any significant deviation from these allocations represents a material contravention of the plan (Heather Hill Management Company CLG v An Bord Pleanála [2019] IEHC 450). Objective CS OBJ 1 and CS OBJ 3 of the Draft MCDP aim to secure the implementation of the Core Strategy “in so far as practicable” (p.47, 48). This equivocation is inconsistent with the jurisprudence of the High Court which has determined that the maximum population and housing allocations are binding and cannot be materially departed from in the future in absence of a variation of the Plan.

The Core Strategy allocates 1,336 housing units (plus 300 extant permitted but undeveloped units) to ‘rural nodes and the open countryside’. This allocation of 20.1% of future population growth to rural areas is simply unsustainable in the context of the need to rapidly decarbonise transport mobility. It must be recognised that previous MCDP 2013-2019 included a similar aspirational strategy to direct rural housing demand, first and foremost, to rural nodes (‘Graigs’). However, this strategy singularly failed to stem the trends towards rural housing dispersal.

In order to avoid a reoccurrence of this outcome, the Draft Plan must explicitly identify what proportion of future rural housing development shall be directed to rural nodes and this should be differentiated in the Core Strategy from housing allocated to the open countryside. Failure to do so will simply result in continued pressure to accommodate a continuation of unsustainable rural housing patterns.

## **8. ‘Local Need’ and Rural Housing**

Section 9.5 of the Draft Plan make a distinction between rural areas under urban influence and rural areas outside these catchments. It is proposed to continue to regulate housing demand in these areas by reference to specific ‘local need residency criteria’ as set out in the Sustainable Rural Housing Guidelines for Planning Authorities 2005. Further to the Court of Justice of the European Union (CJEU) Judgement in the, so called, ‘Flemish Case’, the use of ‘bloodline’ criteria which preferences certain categories of applicant in obtaining planning permission are discriminatory and unlawful under EU law, specifically Article 43 of the EU Treaty on the freedom of movement of citizens. In 2007, the European Commission issued infringement proceedings against Ireland in respect of this matter and in 2017 the Commission revived these proceedings due to lack of progress.

The submission recommends that Section 9.5.3 of the Draft Plan be removed in its entirety and replaced with a revised policy which obliges that applicants for permission in the open countryside must have genuine and demonstrated rurally-generated occupational or employment needs which necessitates a ‘one-off’ dwelling in the

countryside prior to being granted planning permission.

The Draft MCDP resurrects a longstanding attempt to develop greenfield lands in the northern environs of Maynooth for residential and employment uses, including within the grounds of the historic Carton Demesne. A 2009 decision by An Bord Pleanála (PL 17.233330) to refuse planning permission, determined that the development of these lands was contrary to the Development Plan Guidelines for Planning Authorities 2007 which recommends that a logical sequential approach should be taken to the zoning of land, with lands closest to the core and public transport routes being given preference in order to promote a general shift towards the use of public transportation.

The proposed development of these lands was also refused due their sensitive location directly adjoining the Rye Water Valley/Carlton candidate Special Area of Conservation (Site Code: 001398).

The submission recommends that these lands be de-zoned in their entirety as their development is contrary to the principles of proper planning and sustainable development.

#### **Chief Executive's Response**

1. The SEA Report for the Draft Plan has been carried out by independent Environmental Consultants, Brady Shipman Martin. Mitigation measures are addressed in Section 9 of the Draft Plan while Section 9.8.6.4 particularly focuses on Transport and outlines a list of measures proposed to overcome the negative impacts arising from transport emissions. Notwithstanding this, mitigation measures identified in the SEA will be reviewed and updated where required, to overcome the negative impacts arising from transport emissions.
2. The Slane Bypass and Carlanstown Bypass are critical elements of infrastructure proposed to address traffic congestion arising in Carlanstown and Slane. Both projects are supported at a national level and will be the subject of appropriate assessment environmental assessment at a project stage to consider their impacts on air quality, noise and biodiversity as part of the planning application process.
3. The draft CDP places a strong emphasis on a shift to more sustainable and active transport, energy efficient building design and the promotion and development of renewable energy. This is evident in the range of policies and objectives contained within the Climate Change Strategy Chapter which reflect Meaths a target to "Promote minimisation of greenhouse gas (GHG) emissions to the atmosphere". In accordance with the SEA monitoring measures, the Draft Plan is strongly committed to GHG emissions. Notwithstanding this, the text of the SEA monitoring measures can be amended to use the term 'reduce', rather than 'minimize'.
4. As is noted in Section 6.19 of the draft CDP "Primary responsibility for monitoring air quality, as well as the nature and extent of emissions is assigned to the EPA." This data is then monitored by the Climate Action Council as stated in the National Climate Action Plan. This document adds additional actions each year to transition the nation to a low carbon society. These actions will filter down to the local government and are considered in the 2 Year Progress Report of Realising Objectives carried out by the Council. This is a mandatory report and as such, this report is not subject to available resources. Notwithstanding this, taking on board the concerns in relation to the assessment of environmental effects, and monitoring, the ER will be reviewed and updated, where required.
5. Meath Coco. will ensure the conservation of all designated sites and species within the County through the policies and objectives outlined in the Plan. Monitoring of the

qualitative status of the protected sites is a matter for the NPWS, the competent authority for such assessment.

6. It is acknowledged that greenhouse gas emissions must be reduced by at least 40% by 2030. The text in Section 10.5 of the Draft Plan is no longer up to date given the publication of the of the Climate Action Plan 2019. This text will be updated to reflect the latest Climate Action Plan.
7. **Core Strategy**  
As part of the submission of the OPR (MH-C5-60) it is noted that the Core Strategy in the Draft Plan was largely consistent with the relevant national and regional planning policy. With regard to the recent decision noted above, the figures outlined as part of the core strategy will be implemented as part of the development management process, which will be informed by relevant legislation, case law, etc. The specific amendment that is requested is not considered to be required, particularly as Meath County Council, as well as other local authorities are awaiting the publication of updated development plan guidelines. In this regard, the term in so far as practicable is considered appropriate. In relation to the allocation of population to the different towns and rural areas of the county, this is considered appropriate based on the revised Chapter 9 Rural Development Strategy that outlines the approach to development in the rural area. As noted this approach is considered consistent with ministerial guidelines and has been considered as part of the preparation of the Draft Plan, particularly Chapter 10 Climate Change.
8. **'Local Need' and Rural Housing**  
Please refer to Part 3 of Report which refers to Grouped Themed Submissions, specifically Grouped Themed submission no. 1 which relates to Rural Housing Policy.

#### Chief Executive's Recommendation

1. No Change recommended
2. No Change recommended
3. Replace p159 of the SEA Environmental Report as follows: '*Promote the reduction ~~minimisation~~ of greenhouse gas (GHG)*'
4. Remove (~~subject to available resources~~) beside Chief Executives Progress Report in SEA.
5. No Change recommended
6. No Change recommended
7. Amend Section 10.5 of the Climate Objectives as follows:  
To support the implementation of **the Climate Action Plan 2019**  
~~National Climate Change Strategy~~ and to facilitate measures which seek to reduce emissions of greenhouse gases in the **Electricity, Enterprise, Built Environment, Transport, Agriculture and Waste sector.**
  - a. Reducing Meath County Councils  
~~emissions by 33% by 2020.~~
  - b. Reducing CO2 emissions of the county  
~~by at least 40% by 2030~~

Submission No.:	MH-C5-277
Submitted by:	Deborah Behan
Submission Theme(s):	Chapter 10 Climate Change, Enfield Written Statement, Chapter 7 Community Building Strategy
Summary of Submission:	

This submission covers a range of issues in the Draft Plan which addresses concerns relating to climate change, movement, settlement and movement, and community and building infrastructure in Enfield. A summary of the issues are outlined below:

#### **Chapter 10 Climate Change Strategy**

1. DM OBJ 166 DM OBJ 167 provides for EV charging points of a rate of 10% of total space numbers. The submission highlights the need to enforce this due to the lack of existing availability of EV charging points, particularly in an Irish Rail Car Park, the location of which is not specified. It is assumed in this instance that the car park referred to is located in Enfield.

#### **Enfield Written Statement**

2. The submission raises concerns regarding pathway usage as a pedestrian in Enfield due to motorist speeding on the Johnstown Road, particularly from the green light at the ring road to the lights on Main Street, and vice versa. This road needs to have traffic calming measures introduced. There are four housing estates currently using this road as a means to walk to school or to the village and the footpaths are not wide enough, where children are walking on the road to get around other slower moving pedestrians
3. The proposed location for the new park and ride facility is not suitable. The location is unsafe and is located at an existing bottleneck. It should instead be moved to the periphery of the town and have a designated bus stop located beside it.
4. Referring to Section 5.4 Movement, it is submitted that the outer ring road is dangerous for walking and cycling. Vehicles speed well in excess of the newly increased limit of 80kph increasing stones and road chippings to deflect at pedestrians using the pathway. Increased volume of cars, vans and heavy goods vehicles use this road to avoid paying the M4 Toll. Traffic management plans including revising the speed limit, safety of current and proposed usage need to be considered.
5. The new junction layout on the outer ring road and the Johnstown Road intersection, and the restriction of left turning, southbound heavy goods vehicles has caused a side effect of vehicles using lands before the M4 motorway as some sort of depot. These vehicles are now driving through Enfield main street and Johnstown Road to access this depot.
6. The two peripheral roundabouts for Enfield need to be updated with clear signage, road outlines and painting to include definite points about local access only through the town and all other traffic being directed to the outer ring road. The thru road on Main Street needs to be revised with serious health and safety issues regarding ingress and egress at SuperValu carpark. Due to the bus stop blocking the view of the main street along with pedestrians crossing, this junction has caused many incidents in recent years. Any future works to be carried out at the old ESB station will only further exacerbate this. The angled car park spaces in front of Tesco Express are unsuitable. Main Street needs traffic calming measures to further discourage through way traffic from using the town as a rat run to avoid the outer ring road.
7. We need to future proof road layouts and access to the new secondary school for Enfield and allow for wide, well-lit and safety bounded cycle tracks to and from the junction.

#### **Chapter 07 Community Building Strategy**

8. The submission fears the SOC Pol 6 to ensure a Social Infrastructure Assessment accompanies applications for larger housing developments, will not identify the deficiencies in the town of Enfield, in particular GP services, dedicated meeting facilities for clubs and volunteer groups and inadequate pedestrian and Cycle infrastructure.

#### **Chapter 3 Settlement and Housing Strategy**



9. With the housing growth rate for Enfield outlined in the Draft Plan, *'addressing the legacy of rapid unplanned growth, by facilitating amenities and services catch-up, jobs and/or improved sustainable transport links to cities, together with a slower rate of population growth in recently expanded commuter settlements.'* as stated in the Draft Plan will not be achieved. It is therefore asked that the growth of Enfield is slowed until the amenities meet and exceed the needs of residents, so we can accommodate further development.

### Chief Executive's Response

#### 1. Chapter 10 Climate Change Strategy

Meath County Council is fully committed to the delivery of EV charging points and this has been reflected the Draft Plan under the following policies and objectives:

MOV POL 16: *"To support the provision of electricity charging infrastructure for electrical vehicles both on street and in new developments in accordance with car parking standards and best practice"*

DM OBJ 166: *"All car parks shall include the provision of necessary wiring and ducting to be capable of accommodating future Electric Vehicle charging points, at a rate of 10% of total space numbers."*

DM OBJ 167: *"In any car park in excess of 20 spaces where public access is available, one fully functional charging point for Electric Vehicles shall be provided in accordance with IEC 61851 Standard for Electric Vehicle Conductive Charging Systems."*

#### Enfield Written Statement

2. Proposals for traffic calming measures are supported by MOV OBJ 40 of the Draft Plans which *'To implement a programme of traffic and parking management measures in towns and villages throughout the County, as resources permit.'* The consideration of such measures in addition to the appropriateness road layouts for cyclists, pedestrian usage and traffic safety issues will be dealt with in detail during the preparation of the Enfield LAP which will be carried out during the lifetime of the County Development Plan.
3. With respect to the location of the proposed Park and Ride, this has been raised in a number of submissions relating to Enfield and been considered by the Transportation Department. It is held that the location of the Park and Ride in the main street is considered appropriate due to its proximity to the existing bus stop. EN OBJ 16 provides for the development of a Park and Ride on the old OPW Building in the main street of Enfield. This will serve to alleviate traffic congestion on the main street arising from commuter parking in the town.

Park and Rides serve as intermodal transfer facilities to enable access to public transport. The proposed location for the Park and Ride will be adjacent to the Enfield Bus Stop which will serve Routes 20, 115, 120cc, 763 and 847, the result of which is expected to alleviate on-street parking issues and subsequent traffic delays which arise from commuters parking on the main street to avail of the bus service. As per EN OBJ 8 of the Enfield Written Statement, Meath County Council is pursuing the provision of a Park and Ride subject to a Part 8 procedure upon which, stakeholders and members of the public will be provided with an opportunity to make a submission in respect of Park and Ride proposal.

4. Having regard to walking and cycling along the Outer Ring Road, the Enfield Written Statement ENF OBJ 08 aims to *'To continue to support and facilitate the extension of the footpath and cycle path improvement works within the town.'* In order to ensure the above objective extends to the Outer Ring Road, this will be amended to include 'and along the Enfield By-Pass' (Refer to response to MH-C5-31)

It is also an objective of the Draft Meath County Development Plan to prepare Local Transport Plans for a range of settlements in Meath, as deemed necessary - MOV OBJ 1 refers. Enfield will be assessed for its need for a Local Transport Plan which would consider



the road safety and traffic aspects raised in this submission.

5. With respect to the aforementioned traffic light junction, this issue has been raised in a number of submissions due to concerns that the proposed lights further delay traffic through the town and deter use of the Ring Road. The junction referenced in this submission has been assessed by the Transportation Department and considered to be an appropriate junction for road users and safer for pedestrians and cyclists than a Roundabout. It is not intended to upgrade or alter this particular junction.
6. The erection of signage needs to be tightly regulated for road safety and environmental reasons and signage at roundabouts and signage must be carried out in accordance with Spatial Planning and National Roads Guidelines and The Provision of Tourism and Leisure Signage on National Roads (2011). The erection of Local Access Only Signage through the town is misleading and usually applies in the case of temporary road works.

It should be noted that is the objective of the Draft Plan to prepare and commence implementation of, Local Transport Plans (LTP), in conjunction with the NTA and relevant stakeholders for a range of settlements in Meath. Should it be deemed appropriate, a Local Transport Plan will be drafted for Enfield which will consider traffic calming measures as part of a wider Transport Plan.

7. As stated above, the provision of wide, well-lit and safety bounded cycle tracks is adequately supported for under ENF OBJ 08 of the Draft Plan.
8. Chapter 07 Community Building Strategy - The implementation of SOC OBJ 6 will be managed appropriately through the Development Management Process.
9. Chapter 3 Settlement and Housing Strategy - The growth rate outlined for Enfield has been addressed as part of the response to submission MH-C5-281. As such it is considered that the approach outlined in the Draft Plan is appropriate and this has been updated as part of a revised Table 2.11 as noted in the response to the OPR (MH-C5-60).

#### **Chief Executive's Recommendation**

No Change Recommended.

<b>Submission No.:</b>	MH-C5-440
<b>Submitted by:</b>	GK
<b>Submission Theme(s):</b>	Chapter 10 Climate Change, Enfield Written Statement, Chapter 7 Community Building Strategy
<b>Summary of Submission:</b>	
This submission pertains to the development of Data Centres in Meath. The primary recommendation of this submission is to prohibit further development of Data Centres. This is based on the premise that the energy costs, associated with the operation of such facilities outweigh the economic benefits brought about by its construction and operation. These costs will arise from excessive fossil fuel use that will lead to Ireland failing to achieve its EU renewable energy targets and facing substantial EU fines.	
<b>Chief Executive's Response</b>	
It is the policy of the Draft Plan, ED POL 13, to support and facilitate the development of data centres on suitable sites with supporting infrastructure. The development of data centres is	

consistent with the National Planning Framework which aims to promote Ireland as a sustainable international destination for ICT infrastructures such as data centres and associated economic activities. The County Development Plan must remain consistent with national planning policy.

**Chief Executive's Recommendation**

No change recommended

<b>Submission No.:</b>	MH-C5-522
<b>Submitted by:</b>	Gillian Toole
<b>Submission Theme(s):</b>	Chapter 5 Movement Strategy, 06. Infrastructure Strategy, 07. Community Building Strategy, 09. Rural Development Strategy, 10. Climate Change Strategy
<b>Summary of Submission:</b>	
<p>This submission from Cllr Toole raises a range of issues which are summarised below:</p> <ol style="list-style-type: none"> <li>1. Reservations have been raised about the amount of land zoned for "general enterprise &amp; employment and believes over zoning has taken place.</li> <li>2. Submits that access to independent living accommodation &amp; nursing home support should be the "norm". As people age &amp; wish to relocate to be nearer to their children, many of who located in Meath in the mid 1990's, Infrastructural investment is required to support such settlements.</li> <li>3. Raises concerns relating to increased housing densities which are resulting in parking issues and access problems.</li> <li>4. Requests clarification on the need for the White lands east of the R155.</li> <li>5. Advises that the LIHAF Ratoath Outer Relief road MUST be completed to the R125, prior to the construction of any further developments- to relieve traffic congestion in the town centre and on all approach roads to Ratoath.</li> <li>6. Recommends the encouragement of green roof technology and rainwater harvesting.</li> <li>7. Where safe &amp; practicable to do so, kerb-side recycling/ bottle-bank facilities will be accommodated</li> <li>8. To include Scouting Groups in Soc Obj 1.</li> <li>9. Add in to policy SOC POL 21 " at the commencement of the development of....." areas of concentrated employment; neighbourhood centres; large retail developments etc.</li> <li>10. SOC POL 30-"To support the provision of one-stop primary care medical centres &amp; GP practices at locations easily accessible to and with adequate parking facilities for members of the wider community".</li> <li>11. SOC OBJ 12-Include Ratoath in this list of towns.</li> <li>12. SOC OBJ 18-Enhance library facilities in Dunshaughlin also.</li> <li>13. SOC OBJ 19-Include Ratoath in this list of new libraries.</li> <li>14. Include The Black Bush/ Growtown/ Rathbeggan as a rural node.</li> <li>15. Rur Obj 30 And Rur Obj 31 are worded identically. Therefore, one should be omitted.</li> <li>16. Include the setting up of a Community Grant Scheme from a "haul levy", based on the tonnage of aggregate extracted or the tonnage of inert material required for land filling for the Extractive Industry &amp; Building Materials production.</li> <li>17. In section 11.9.2 Childcare, insert the following in DM POL 35 at the commencement of the development of....." <i>areas of concentrated employment; neighbourhood centres; large retail developments etc.</i>"</li> <li>18. In the assessment criteria for , to include "sites connected to settlements by way of public footpath".</li> </ol>	

19. To include the following as an objective of the Council: "To avoid the location of wind farms in sensitive landscapes, in nature; conservation areas, in highly sensitive landscapes and where views are to be preserved.
20. With regard to White Lands, the submission proposes to include Ratoath as a fourth location within the guidance of White Lands. It is submitted that Ratoath has a significant acreage zoned or proposed to be zoned for E2 [ Enterprise/ employment] & C1 [mixed use]- most of these lands remain undeveloped. Therefore, lands in Ratoath zoned E2 & C1 should be developed in priority to "White Lands". The submission recommends insertion of the following:  
 "These are strategic lands & their designation is to allow for a long term, integrated approach to be taken to the expansion of an urban area. It is not generally envisaged that development proposals will be brought forward during the life of this Development Plan for such lands. No indication is therefore generally offered regarding the suitability or otherwise of individual uses on said lands within this Development Plan. Should the Planning Authority be satisfied that a project proposed for lands with a "White Lands" designation would assist with the implementation of the Economic Strategy, these lands can be released for employment creating development during the plan period in accordance with the Economic Strategy. "White Lands" can only be released where it would lead to significant employment creation, or which cannot be reasonably accommodated on other employment-zoned land".

#### **Chief Executive's Response**

1. The quantum of lands zoned as part of the Draft Plan is considered to be consistent with the need to provide live work communities as noted in CS OBJ 16 and ED POL 3. In this regard the quantum of land zoned is considered consistent with the need to encourage employment generating activities in the county.
2. In relation to issues raised, Chapters 3 and 7 of the Draft Plan 2016-2022 already include a series of policies and objectives which supports the creation of inclusive communities for Older People throughout the County (Section 7.6.2.2 and 7.6.2.3 refer.). The Housing Strategy includes policies which promote social integration, range of dwelling types, as well as accommodation for older people (in line with Age Friendly Strategy 2017-2020). The principles of universal design are also supported. (Sections 3.8.8, 3.8.8.1 refers) The aforementioned policies are therefore considered sufficient to support to the needs of older people.
3. The housing densities as detailed in the Draft Plan are in compliance with Ministerial Guidelines. Parking and access are assessed as part of the Development Management process.
4. The objective of the WL zoning is 'To protect strategic lands from inappropriate forms of development which would impede the orderly expansion of a strategic urban centre'. These are strategic lands and their designation is to allow for a long term, integrated approach to be taken to the expansion of an urban area. Should the Planning Authority be satisfied that a project proposed for lands with a white land designation would assist with the implementation of the Economic Strategy, these lands can be released for development during the plan period. The suitability of any proposal for a WL zoning will be assessed in detail as part of any planning application and it would be a requirement to demonstrate that the development cannot be accommodated on other employment zoned lands within the settlement.
5. The Ratoath Outer Relief, the Council obtained funding, through the Local Infrastructure Housing Activation Fund (LIHAF), to deliver a portion of the Ratoath Outer Relief Road which will facilitate the development of lands to the east of the town.  
 The Ratoath Town Statement includes the following objective: RAT OBJ 7: *'To facilitate*

*the development of the Ratoath Outer Relief route in tandem with development'. Map 33(a) has been updated to reflect the route of the Relief Road.*

6. Support for green roof technology and rainwater harvesting is reflected in INF OBJ 27 and INF POL 16 which ensures new development will have regard to the surface water management policies provided for in the Greater Dublin Strategic Drainage Drainage Strategy. This uses Sustainable Urban Drainage Systems (SuDS) which is regarded as offering a "total" solution to rainwater management and is applicable in both urban and rural environments.
7. The support of kerb-side recycling/ bottle-bank facilities is adequately addressed in INF OBJ 62 which aims 'To identify suitable sites for additional recycling centres and bring bank facilities subject to the availability of appropriate funding and infrastructure, through the public or private sector, as appropriate.'
8. It is not considered necessary or appropriate to specifically include reference to 'Scouting Groups' in SOC OBJ 1. This policy is intended to be broad ranging to cover a range of facilities for younger people and the identification of such a specific use would be too prescriptive.
9. With regard to SOC POL 21, the point raised is noted and the provision of childcare facilities at the outset would be the preferred solution. However, there may be instances where employment parks/neighbourhood/residential centres etc. are long established and it would be desirable to make provision for childcare provision in such locations. Therefore, amending the wording as proscribed would be too prescriptive in this instance. It is noteworthy however that SOC POL 6, makes provision for social infrastructure as part of new residential developments applications i.e. all applications of 50 units or more are accompanied by a Social Infrastructure Assessment.
10. With regard to SOC POL 30, the concern it is not considered appropriate to include reference car parking availability as part of this policy. Car parking standards shall be in accordance with the standards prescribed in Chapter 10 Development Management Standards.
11. SOC OBJ 12 refers to town parks at a regional scale. As part of the preparation of the Draft Plan, the PA has engaged with various sections of the Council in addition to external agencies to identify the community infrastructural needs required to assist in the creation of a more balanced and sustainable communities. Through this process, the need for a town park of regional scale in Ratoath was not identified however, it is an objective of the Council to develop a system of linear parks and waterfront amenity areas with walkways and cycle ways, subject to the availability of resources, along the banks of the River Broadmeadow. (RA OBJ 9 refers) It is considered that the Plan has identified sufficient social and community lands to meet the needs of the Ratoath during the life of this Plan. However, it should be noted that as part of the Ratoath Local Area Plan process, the requirement for additional facilities can and will be examined in greater detail.
12. It is an objective of the council (SOC OBJ 21) 'To provide and improve existing library facilities and services and to encourage an integrated approach to the delivery of library, arts and other related services'.
13. A standalone site for a library in Ratoath is not currently listed as a priority in the Library Development Plan. The plan is scheduled for review and consideration will be given to the need to upgrade or provide new libraries as part of that review process.
14. With regard to proposals for rural node, please note this submission along with many others requests the designation of an additional Rural Nodes. The designation of additional Rural Nodes within the County would represent a piecemeal uncoordinated approach for designating land for which there is no evidence-based need. The quantum and location of land identified for development in the County is directly influenced by the Development Plan's Settlement and Core Strategy. Based on the evidence-based

approach adopted in the Core Strategy for the County, it is clear, that Meath has a significant and sufficient quantum of land designated to meet the regional targets for the Development Plan period. Furthermore, designating additional rural nodes would result in a development pattern with deficiencies in terms of the provision of basic infrastructure and public services, in addition to unsustainable travel patterns, encroachment onto and loss of valuable agricultural and adverse visual impact. . (For further information please refer to sub. no 15, Chapter 9 Rural Development Strategy)

15. The issue raised regarding duplication of objectives (RUR OBJ 30 and 31) is noted). RUR OBJ 31 shall be deleted and remaining objectives re numbered).
16. This issue raised relating to the Community Grant Scheme is considered to be outside the strategic land use function of the Development Plan. However, it can be considered as part of the preparation of the Development Contribution Scheme.
17. As part of the Development Management process childcare facilities are required to be provided within the early phases of a development and are encouraged at the locations detailed in DM POL 35.
18. DM OBJ 145 states that 'Site location - the suitability of the site comparable to the location of the population served; sites in or at the edge of the settlements are more preferable'. As detailed in this objective sites within or at the edge of settlements are preferable however it is recognised that this may not always be possible. The suitability of pedestrian access to allotment developments would be assessed as part of the Development Management process.
19. As per DM OBJ 146 the impact of a wind farm development on the landscape, protected views and designated sites will assessed as part of any planning application. As per DM POL 39 any proposal must comply with the Wind Energy Development Guidelines, (2006) and Circular PL20-13, and any updates thereof
20. Ratoath was omitted in error from the 'Guidance for the WL zoning and will be included in the restructured DM Chapter. The Guidance for the WL zoning within the Draft Plan states that should the Planning Authority be satisfied that a project proposed for lands with a white land designation would assist with the implementation of the Economic Strategy, these lands can be released for development during the plan period. The suitability of the project and an assessment of alternatives will be assessed as part of any development proposal.

#### **Chief Executive's Recommendation**

No change recommended.

<b>Submission No.:</b>	MH-C5-544
<b>Submitted by:</b>	Protect East Meath
<b>Submission Theme(s):</b>	Strategic Environmental Assessment
<b>Summary of Submission:</b>	
<p>The submission is summarised as follows:</p> <ol style="list-style-type: none"> <li>1. There are significant issues with the Strategic Environmental Report which if left unaddressed will result in a SEA procedure that is unlawful having regard to the Strategic Environmental Assessment Directive. In particular the assessment of alternatives is defective. There are numerous targets for which there are no relevant indicators and conversely there are indicators that are unrelated to targets. Finally, the monitoring is seriously deficient.</li> <li>2. There needs to specific monitoring of significant environmental effects in Julianstown Co Meath. To that end an expert report is presented showing the R132 is almost at its theoretical capacity – therefore specific monitoring of traffic growth is required. Furthermore, bearing in mind the purpose of monitoring the traffic growth needs to be monitored annually and should be reported to Louth County Council, TII, the NTA and the Department of Transport Tourism and Sport.</li> <li>3. The local community in Julianstown is making air quality data available to Meath County Council at little or no cost. This data needs to be monitored in respect of emissions from vehicular traffic and solid fuel burning. The monitoring results should be reported to the EPA and Department of Health.</li> </ol> <p>This submission has been accompanied by a petition.</p>	
<b>Chief Executive's Response</b>	
<ol style="list-style-type: none"> <li>1. Comments in relation to SEA alternatives and monitoring are noted. The Environmental Report will be reviewed and updated, where required, to take account of the comments provided.</li> <li>2. With regard to specific monitoring of significant environmental effects in Julianstown, the Author is referred to the EPA website where the closest Air Monitoring Station to Julianstown can be identified with monitoring results available online for viewing. The provision of a EPA Air Quality Monitoring Station for Julianstown is outside the control of Meath County Council, is outside the remit of the County Development Plan, and does not have the resources necessary carry out air quality data analysis beyond what is made available by the EPA.</li> <li>3. The monitoring of air quality is primarily the responsibility of the EPA as well as the nature and extent of emissions. The Council's role in relation to air quality is to promote a reduction in air pollution, through the implementation of relevant legislation and through the provision of advice and guidance on best practice.</li> </ol>	
<b>Chief Executive's Recommendation</b>	
No Change Recommended.	

<b>Submission No.:</b>	MH-C5-732
<b>Submitted by:</b>	Statkraft
<b>Submission Theme(s):</b>	Chapter 10 Climate Change
<b>Summary of Submission:</b>	
<p>This submission comes from Statkraft, a generator of Renewable Energy in Europe. The submission supports IWEA in their response to the consultation process and highlights that each Local Authority has a part to play in Ireland Future climate change ambitions, which is to achieve 70% of renewable energy by 2030. The following key issues are highlighted below.</p> <ol style="list-style-type: none"> <li>1. If a Development Plan supports the development of 150 or 200MW of suitable and appropriate wind energy projects over the term of its plan, this would result in a community benefit of €10 to €15 million euros for local communities along with rates for the council in the order of €30 to €40 million over the lifetime of those developments.</li> <li>2. There is no reference or commitment to producing a renewable or wind energy strategy for the County within the draft Plan.</li> <li>3. The Landscape Character Assessment, which was developed as part of the current Plan is negative in respect of wind energy development with the majority of areas having 'low' or 'no' capacity for wind energy development. The submission believes this is in conflict with the National Planning Framework and Climate Action Plan and that a new Landscape Character Assessment should be completed for the county which is in line with National Policy and Climate action targets.</li> <li>4. There is a lack of commitment towards developing a meaningful renewable or wind energy strategy for the County. Currently, County Meath holds approximately 0.22% of the total installed wind energy developments in the Republic of Ireland.</li> </ol>	
<b>Chief Executive's Response</b>	
<ol style="list-style-type: none"> <li>1. The comments in respect of renewable energy generation are noted and it is very much part of this Draft CDP to promote and encourage wind energy in line with national policy as stated in the National Planning Framework: <p>National Policy Objective 55: <i>"Promote renewable energy use and generation at appropriate locations within the built and natural environment to meet national objectives towards achieving a low carbon economy by 2050"</i></p> <p>Supporting objectives within the draft CDP are found in ED POL 19, INF POL 41, INF POL 34 and INF 35.</p> </li> <li>2. It is acknowledged that Meath County Council have not adopted a Renewable Energy Strategy and has awaited the adoption of the Revised Wind Energy Development Guidelines in advance of progressing with a county strategy to ensure compliance with the latest national wind energy policy. Meath County Council are committed to the</li> </ol>	



preparation of a Renewable Energy Strategy during the lifetime of the Development Plan. This is supported by INF OBJ 47 of the Draft Plan.

3. Currently, proposals for wind energy development must have regard to the Landscape Character Assessment of the County. It is anticipated that a revised Landscape Character Assessment will be carried out during the lifetime of the Plan and will be incorporated by way of variation.
4. As noted, the Draft Plan contain a range of objectives supporting the development of renewable energy and it is anticipated that a Renewable Energy Strategy and Revised Landscape Character Assessment will be carried out during the lifetime of this Plan. These documents will serve to expand on and clarify policies for wind energy development.

#### **Chief Executive's Recommendation**

No change recommended.

<b>Submission No:</b>	MH-C5-764
<b>Submitted by:</b>	Bord Na Mona
<b>Submission Theme(s):</b>	Chapter 10 Climate Change, Enfield Written Statement, Chapter 7 Community Building Strategy
<b>Summary of Submission:</b>	
<p>This submission by Bord Na Mona raises points relating to climate change.</p> <p>The comments put forward in their observation on Biodiversity (Section 8.9) must also be noted for Section 10.2 – What is Climate Change. The development of naturally functioning peatland ecosystems will lead to the restoration of carbon sequestration potential. This will support the main carbon mitigation land-use objectives of the National Climate Action Plan, as reflected in the Draft Meath County Development Plan, while also providing other benefits for biodiversity and other ecosystem services.</p> <p>Bord na Móna welcomes the policies and objectives outlined in Section 10.5.8 of the Draft County Development Plan with respect to renewable energy, in particular INF POL 41, INF POL 42, INF OBJ 39 and INF OBJ 47. However, it is our view that the Draft County Development Plan needs to go further and reflect the position stated in the National Planning Framework that “some of Ireland’s cutaway bogs are suitable to facilitate the generation of energy, most notably wind/biomass” (NPF, page 77). This position was mirrored in the Eastern and Midlands Regional Spatial and Economic Strategy (RSES) which stated that “Local authorities should harness the potential of renewable energy in the Region across the technological spectrum from wind and solar to biomass and, where applicable, wave energy, focusing in particular on the extensive tracts of publicly owned peat extraction areas in order to enable a managed transition of the local economies of such areas in gaining the economic benefits of greener energy” (RSES page 179).</p> <p>It is asked that Meath County Council reflect the importance that cutaway bogs have in terms of renewable energy generation. BNM lands are brownfield in nature, have limited environmental constraints and are largely removed from large numbers of sensitive receptors. They are also in close proximity to the national grid and have good road access. These factors make them prime sites for the development of large-scale renewable energy projects.</p>	
<b>Chief Executive's Response</b>	
The Chief Executive recognises the importance of cutaway bogs as potential sites for renewable	

energy development. The point in this submission is noted and will be incorporated.

#### **Chief Executive's Recommendation**

The following amendments are proposed to Chapter 8 Cultural and Natural Heritage Strategy of the Draft Plan.

Amend Section 8.11 Peatlands, page 287 as follows:

The County represents the eastern limit of raised bogs in Ireland and the Council recognises the potential for utilisation of protected areas for tourist, amenity, educational and research purposes. The Council will liaise with the various government and non-government organisations involved in an effort to secure the conservation of the peatland areas. **The Council also recognises the potential for some cutaway to facilitate various complimentary activities such the generation of renewable energy, diverse ecosystems and places of public amenity.**

# Chapter 11

## Development Management

<b>Submission No.:</b>	MH-C5-25
<b>Submitted by:</b>	Health & Safety Authority
<b>Submission Theme(s):</b>	Chapter 11 DM Standards
<b>Summary of Submission:</b>	
<p>The HAS is an authority under Article 13 of the Planning &amp; Development Regulations 2001-2013 and is required to be considered in relation to the Development Plans under sections 11-13 &amp; 24 of the Act.</p> <p>The Authority would expect the planning guidelines to contain;</p> <ol style="list-style-type: none"> <li>1) An indication of planning policy in relation to major accident hazard sites notified under the regulations, which reflects the intention of Article 13 of Directive 2012/18/EU</li> <li>2) The Consultation distances and generic advice, where applicable supplied by the Authority to MCC in relation to such sites. These distances to be indicated on the various maps included in the plan, as well as any more specific distances and advice supplied by the Authority.</li> <li>3) A policy on the siting of new major hazard establishments, taking account of Article 13 and the published policy of the Authority in relation to new developments, including developments in the vicinity of such establishments</li> <li>4) Mention the following notified establishments; <ul style="list-style-type: none"> <li>A – Grasslands Argo</li> <li>B – Xtratherm Limited</li> <li>X – Boliden Tara Mines</li> </ul> </li> </ol>	
<b>Chief Executive's Response</b>	
<p>The Seveso III Directive, 2012/2018/EU came into force in Ireland on 1<sup>st</sup> June 2015 replacing the Seveso Directive II. The Directive is aimed at the prevention of major accidents involving dangerous substances. Note it is an objective of the CDP (DM POL 45) to comply with the Seveso III Directive in reducing the risk and limiting the potential consequences of major industrial incidents</p> <p>Table 11.5 of the draft CDP provides a list of Seveso sites in Co. Meath or sites where consultation distances extent into the County. It should be further noted that the above-mentioned establishments have been indicated in this list (Sites 1, 2 &amp; 3).</p> <p>It should be further noted that it is a policy of the draft CDP to permit new Seveso development only in low risk locations within acceptable distances from vulnerable, retail and commercial development. Further policy in relation to Seveso are found in the Development Management Chapter (DM POL 47 – 49).</p>	

<b>Chief Executive's Recommendation</b>
No change recommended.

<b>Submission No.:</b>	MH-CS-319
<b>Submitted by:</b>	Tom Phillips Associates on behalf of Indaver Ireland Limited
<b>Submission Theme(s):</b>	Land Use Zoning RA & Waste Energy Facilities
<b>Summary of Submission:</b>	
<p>This submission focuses on the rural land use zoning for uses such as Waste Energy Facilities. The submission considers that the draft County Plan acknowledges the contribution which industries such as Indaver Waste to Energy plant play within the Meath economy and that appropriate policies are in place in order to secure the future operation and expansion of these industries into the future.</p> <p>The submission seeks an addition to the guidance note within the zoning matrix for the rural area land use zoning which recognises that the rural area zoning objective also includes areas and operations which are non-rural in sue and nature.</p> <p>It is requests that policies ED POL 20 and ED POL21 are reinstated.</p> <p>The subject site is located approx. 2 km east of Duleek Village and 4 km south west of Drogheda. The site is directly accessible from the R152 (regional route) M1 motorway is located approx. 2km to the north east.</p> <p>The submission identifies several historical planning permissions which have long established the associated use of the site since 2003. The submission suggests caution is required with the regard to the broad application of the 'rural area' land use zoning to large swathes of the County.</p> <p>Development management standards and land use zoning objectives are set out in Chapter 11 of the Draft County Plan. Table 11.7 provide the Objectives for each zoning.</p> <p>The submission considers that the listed uses and guidance does not sufficiently reflect the broad range of uses which are now located within rural area zonings including that of the subject WTE facility. It is considered that unless the rural area zoning guidance is amended, established industrial sues may be unlikely to be considered to enhance, complement, be ancillary or neutral to the objective. It is therefore submitted that the Draft County Plan should be amended in order to provide clearer recognition of established non-conforming uses</p> <p>It is recommended that the Guidance note relating to the Rural Area (RA) zoning be amended as follows. The primary objective is to protect and promote the value and future sustainability of rural areas 'Agriculture, forestry, tourism, <b>sustainable waste management and energy</b> generation and rural related resource enterprises will be employed for the benefit of the local and wider population. A balanced approach involving the protection and promotion of rural biodiversity, promotion of the integrity of the landscape, and enhancement of the built and cultural heritage will be adopted'.</p> <p>All areas outside the development boundaries of all settlements listed in Volume2 and the rural</p>	

nodes listed in this chapter, have a Rural Area (RA) land use zoning objective. This objective seeks to protect and promote in a balanced way, the development of agriculture, forestry and sustainable rural-related enterprise, community facilities, biodiversity, the rural landscape, and the built and cultural heritage. **It is acknowledged that a wide range of existing industrial, business and enterprise uses are located with the RA land use zoning and ongoing operation and expansion of these uses will normally be supported where the resultant development does not unduly impact on the character and amenity of the surrounding area”.**

#### **Chief Executive’s Response**

All areas outside the development boundaries of all settlements listed in Volume 2 have a Rural Area (RA) land use zoning objective. This objective seeks to protect and promote, in a balanced way, the development of agriculture, forestry and sustainable rural related enterprise, community facilities, biodiversity, the rural landscape and the built and cultural heritage.

It should be noted that Regional Policy Objective (RPO) 6.6 states;

*‘Support Local Authorities to develop sustainable and economically efficient rural economies through initiatives to enhance sectors such as agricultural and food, forestry, fishing and aquaculture, energy and extractive industries, the bio-economy and diversification into alternative on-form activities while at the same time noting the importance of maintaining and protecting the natural landscape and built heritage’*

MCC therefore recognise, that while a number of appropriate uses have been identified for the RA this list is not exhaustive and other uses may be permissible in the countryside subject to compliance with normal planning considerations. Furthermore, any proposal located within the RA must demonstrate compatibility with surrounding land uses by way of noise, nuisance, general disturbance, impact on amenity, cultural & natural heritage et al.

In relation to policies ED POL 20 & 21 please refer to response MH-C5-1016

#### **Chief Executive’s Recommendation**

No change recommended.

<b>Submission No.:</b>	MH-C5-330
<b>Submitted by:</b>	Cllr. Brian Fitzgerald
<b>Submission Theme(s):</b>	Chapter 11 Development Management Standards and Zoning, Core Strategy
<b>Summary of Submission:</b>	
<p>This submission relates to zoning of residential lands across Co. Meath:</p> <ol style="list-style-type: none"> <li>1. It is requested that all lands zoned for residential purposes across Co. Meath as part of 2013-2019 CDP be retained as part of the Draft Plan prior to its adoption. This would include making all necessary changes and modifications as required.</li> </ol>	
<b>Chief Executive's Response</b>	
<p>A land use zoning map has been prepared for each settlement included in the settlement hierarchy. These maps illustrate the location and extent of zoned lands in each settlement. The quantum of lands zoned for residential uses is reflective of the population projection and household allocation for each settlement as set out in the Core Strategy.</p> <p>In a settlement where a surplus of residential lands remains, lands have been prioritised based on their location, the availability of services and the likelihood of lands being developed within the lifetime of the Plan.</p> <p>A reserve of residential lands not available for development until after 2027 has been provided in settlements where there are fundamental reasons, supported by national and regional policy that would support the requirement to phase such lands. (please refer to section 3.6 of the draft CDP)</p>	
<b>Chief Executive's Recommendation</b>	
No change recommended	

<b>Submission No.:</b>	MH-C5-346
<b>Submitted by:</b>	MKO on behalf of Glenveagh Properties PLC
<b>Submission Theme(s):</b>	Development Management Standards
<b>Summary of Submission:</b>	
<p>This submission focuses on the Development Management standards and current operational policies associated with residential development.</p> <p>The submissions references key strategic objectives and guidelines including;</p> <ul style="list-style-type: none"> <li>- National Strategic Objective 1;</li> <li>- National Policy Objectives 3a, 3b and 3c of the National Planning Framework.</li> </ul> <p>Further, the submission sets out some of the key principles to achieving compact growth of urban settlements. It goes onto state that the RSES will be implemented in policy by way of the County Development Plan and therefore requires a focus on efficient use of serviced land and delivery of appropriate densities within urban settlements.</p> <p>New ways of developing high quality housing presents an opportunity for local authorities to</p>	



consider innovative ways of promoting and delivering their own development plan policies and standards. New homes need to be flexible to meet the needs for a range of household types and sizes and to meet individual; households changing needs overtime, therefore a 'one size fits all' approach will not work into the future.

MKO propose the following inclusion of the below text as part of the forthcoming Development Plan objectives.

DM OBJ 20

- A minimum of 22m separation between directly opposing rear windows at first flood level in the case of detached, semi-detached, terraced units shall generally be observed **unless an alternative provision has been designed to ensure privacy, or a suitable design response can be arrived at which ensures the quality of living and privacy is maintained.**

DM OBJ 21

- A minimum of 22m separation distance between opposing windows will apply in the case of apartments/duplex units up to three storeys in height **unless an alternative provision has been designed to ensure privacy, or a suitable design response can be arrived at which ensures the quality of living and privacy is maintained.**

DM OBJ 22

- Any residential development proposal which exceeds three or more storeys in height shall demonstrate adequate separation distances having regard to layout, size and design between blocks to ensure privacy and protection of residential amenity **unless an alternative provision has been designed to ensure privacy, or a suitable response can be arrived at which ensure the quality of living and privacy is maintained**

DM OBJ 24

- To ensure that all residential developments are of a high design quality, incorporating a suitable mix of unit types, high quality, durable external finishes and make a positive contribution to the visual amenities of the area. **In order to facilitate and encourage innovative design solutions, the Council will exercise flexibility in the application of the development management standards in instances where high quality design and layout has been demonstrated and subject to maintenance of adequate privacy and protection of residential amenities.**

DM OBJ 34

- Public open space shall be provided for residential developments at a minimum rate of 15% of the total site area **unless an alternative provision has been designed that ensues a high-quality design and optimal use of space. Flexibility of these standards will be permissible for sites in proximity to public recreational parks and facilities.** In all cases land zoned F1 Open Space, G1 Community Infrastructure and H1 High Amenity cannot be included as part of the 15%. Each residential development proposal shall be accompanied by a statement setting out how the scheme complies with this requirement.

DM OBJ 36

- In all residential development applications where the future population will exceed 1000 persons, open space in addition to the 15% requirement set out at DM OBJ 34 shall be provided at a minimum rate of 3.2 Ha (8 acres) per 1000 population in accordance with table 11.1 **unless an alternative provision has been designed that ensures a high quality design and optimal use of space.** All such residential development proposals shall be accompanied by a statement setting out how the scheme complies with the requirements set out in table 11.1. **Flexibility of these standards will be permissible for sites in proximity to public recreational parks and facilities.**

#### DM POL 9

- Residential development shall provide open space in accordance with the requirements set out in table 11.2. each residential development shall be accompanied by a statement setting out how the scheme complies with the requirements out in table 11.2. **Flexibility of these standards will be permissible in response to well designed development proposals where the quality of living and privacy is maintained.**

#### Chief Executive's Response

The submissions seeks to incorporate a degree of flexibility for the policies and objectives outlined above through amendments to the current wording of same.

MCC are supportive of innovative design solutions and it is considered that an element of flexibility is currently incorporated within the Plans existing objectives and operational policies. The submissions seeks to expand on the flexibility incorporated therein however, this may lead to the dilution of the primary objective of the policy identified.

The existing use of language such as 'generally be observed' (DM OBJ 20) and 'adequate separation distance' (DM OB 22) are not exhaustive and therefore are able to facilitate potential circumstances where a minimum target such as a separation distance or provision of open space cannot be achieved – therefore a possible design solution may be permissible to off-set this shortfall.

That being said, MCC acknowledge that specific objective should be intruded to confirm support for same and as such DM OBJ 11 has been included in Chapter 11 which seeks to encourage innovative design solutions as an overarching design objective of the CDP.

#### Chief Executive's Recommendation

It is proposed to include additional objective at Chapter 11 Development Management to read;

"DM OBJ 11 - To encourage and facilitate innovative design solutions for medium to high density residential schemes where substantial compliance with normal development management considerations can be demonstrated"

#### Submission No.:

MH-C5-398

<b>Submitted by:</b>	Ivan O'Daly, MRIA on behalf of O'Daly Architects
<b>Submission Theme(s):</b>	CDP draft Objectives
<b>Summary of Submission:</b>	
<p>This submission focuses on draft DM Objectives 34 &amp; 36 (Public Open Space).</p> <p>The submission refers to the provisions being made for public open space as excessive when the cumulative effect of the abovementioned objectives are applied. The submission goes on to state that the provisions are understandable in isolation, however the intention to provide the public open space requirement of DM OBJ 36 in addition to the public open space requirement in DM OBJ 34 are excessive, therefore it should be one or the other, or on a case by case basis.</p> <p>The Guidelines for Planning Authorities on the Sustainable Residential Development in Urban Areas states the following in regard to quantitative provision of public open space: 4.19;</p> <p>Most planning authorities include quantitative standards for public open space in their development plans, generally in the range of 2 -2.5 hectares per 1,000 population and allocated according to a hierarchy of spaces. Assessing open space requirements on a population basis can be difficult due to the unpredictability of occupancy rates where often larger houses and apartments are occupied by fewer persons than the number of bed spaces would indicate.</p> <p>No provision or suggestion that public open space should be provided cumulatively at a rate of 15% of site area and in addition a separate provision of 1,000 population can be found in the guidelines.</p> <p>Submission point 1 suggestions;</p> <ul style="list-style-type: none"> <li>• Remove the requirement for the ADDITION of DM OBJ 36 to the public open space provision under DM OBJ 34 in any circumstance;</li> <li>• Clarify which public open space objective should apply based on scale of development;</li> <li>• Clarify if F1, G1 and H1 zoned lands can be used for the provision of public open space requirement under DM OBJ 36.</li> </ul> <p>Submission point 2 suggestions;</p> <ul style="list-style-type: none"> <li>• Private open space for ½ bedroom houses should be reduced from 55 sqm to 48 sq. The requirement for 55 sqm private open space militates against the consideration of a 2 bedroom houses as an economically viable house type.</li> <li>• The requirement for 55 sqm is too close to the requirements of a 3 bedroom house at 60 sqm. The question therefore constantly arises if its economically feasible to propose a 2 bedroom house from a cost perspective and there is no net benefit for density compared with a 3 bedroom house.</li> <li>• It is critical that development management standards facilitate and encourage the provision of this type of unit.</li> </ul> <p>Submission point 3 suggestions;</p> <ul style="list-style-type: none"> <li>• Create a separate class for car parking for ½ bedroom houses with a requirement of 1 no parking space per unit and 1 no visitor space per 4 houses, certainly on lands where densities of 35+ Ha are being sought;</li> </ul>	

- Reduce the standard provision for car parking per flat/apartment unit to 1 no car space with an additional provision of 1 no visitor car space per 4 apartments to be consistent with the apartment guidelines.

Submission point 4 suggestions;

- Replace the word 'bedspace' with 'bedroom'
- Replace 'housing units' with 'apartment units'

The use of the word "bedspace" rather than "bedroom" would double the bicycle parking requirement for every double bedroom in an apartment development (a double bedroom = 2 bedspaces)

#### **Chief Executive's Response**

The provision of accessible and useable open space is a critical element in community building. Existing green infrastructure should be identified at the initial stages of the design process and should guide the design of an appropriate site layout.

In relation to DM OBJ 36, This has been addressed as part of submission no. MH-C5-669.

#### **Chief Executive's Recommendation**

Please refer to submission MH-C5-669 for recommendation relating to DM OBJ 36.

<b>Submission No.:</b>	MH-C5-607
<b>Submitted by:</b>	Michael McKenna
<b>Submission Theme(s):</b>	Coordination of planning permissions and land uses on zoned lands
<b>Summary of Submission:</b>	
<p>This submission relates to the accuracy of maps associated with draft plan documents. It is submitted that there appears to be a number of inaccuracies with the boundaries / overlays of spatial maps where permission has been granted and construction is underway.</p> <p>It is suggested that these are updated to reflect the most accurate aerial representations.</p>	
<b>Chief Executive's Response</b>	
MCC as part of the material amendments process will ensure that all site boundaries and aerial photography is as update as relatively possible	
<b>Chief Executive's Recommendation</b>	
As above.	

<b>Submission No.:</b>	MH-C5-662
<b>Submitted by:</b>	Cllr. Damien O'Reilly
<b>Submission Theme(s):</b>	Chapter 11 Development Management Standards and Land Use Zoning Objectives
<b>Summary of Submission:</b>	
<p>This submission relates to the provision of an additional policy with regard to the provision of residential structures:</p> <ul style="list-style-type: none"> <li>Meath County Council permits the installation of liveable wooden cabins / Pods in back gardens of family homes</li> </ul>	
<b>Chief Executive's Response</b>	
<p>The development / installation of liveable wooden cabins / pods in the back gardens of family homes is not considered appropriate nor a sustainable form of residential accommodation. The development of same would likely result in overdevelopment of urban areas as well as unbalanced plot ratios with further constraints arising by way of access, servicing, noise, privacy and general amenity. Furthermore, these structures are often not considered to respect the character and appearance of the area in which they are located.</p> <p>The development of backland sites is considered appropriate in some circumstances. This relates to residential development of small development located to the rear of existing buildings in built-up areas. It is the Councils objective (DM OBJ 66) to have regard to the requirement to protect residential amenity and character of existing A1 residential areas backland site development shall satisfy the criteria for infill development, avoid undue overlooking and overshadowing of adjacent properties and shall respect existing building lines where possible. Please also refer to DM OBJ 67 &amp; 68.</p> <p>It should also be noted that family flats are a way of providing additional accommodation with a level of independence for an undefined temporary period of time. Family flats will allow for semi-independent accommodation for an immediate family member (dependent on the main occupants of the dwelling). Applications for family flats. Please refer to RUR OBJ 48 which sets out a list of criteria for applications involving family flat extensions.</p>	
<b>Chief Executive's Recommendation</b>	
No change recommended.	

<b>Submission No.:</b>	MH-C5-782
<b>Submitted by:</b>	Cunnane Stratton Reynolds on behalf of Nua Healthcare
<b>Submission Theme(s):</b>	Land Use Zoning – Supported Living, Healthcare and Community Outreach
<b>Summary of Submission:</b>	
<p>This submission focuses on the provision of supported living and health care accommodation. The submission considers that the Draft Meath County Development Plan gives some support to the provision of healthcare facilities within policy. However, the zoning objectives do not account for healthcare and related uses. The zoning which would appear to support these uses is 'G1</p>	

Community Infrastructure’. However, the zoning objective for the G1 zoning is:

“To facilitate opportunities for high technology and major campus style office-based employment within high quality accessible locations.”

There is therefore an inherent inconsistency between the G1 zoning and the stated zoning objective for same. It is important that healthcare is recognised as a key land use in the provision of sustainable and vital communities as set out in the National Planning Framework (NPF). National Policy Objective 4 of the NPF seeks to provide communities that enjoy a high quality of life and well-being.

Nua Healthcare welcome the strong focus on health included in the Draft Meath County Development plan particularly the inclusion of Social Policy 8.

Nua Healthcare are of the opinion that the wording of this policy is unnecessarily restrictive and limiting to the needs of the elderly. Care Facilities and Residential Care are separate, though in some ways related, with different development needs which potentially require different locations. These care facilities are required by a broad, though under-represented sector of society with very special healthcare needs comprising learning, intellectual, or mental disabilities which are not necessarily the preserve of ‘older people’.

Nua Healthcare would welcome the following policies in supporting the provision of Care and Residential Care facilities;

‘SOC POL 24

To co-operate with the Health Service Executive and other statutory and voluntary agencies and the private sector in the provision of appropriate health care facilities covering the full spectrum of such care from hospitals to the provision of community-based care facilities subject to proper planning considerations and the principles of sustainable development.

SOC POL 25

To encourage the integration of healthcare facilities within new and existing communities and to discourage proposals that would cause unnecessary isolation or other access difficulties, particularly for the disabled, older people and children.

SOC POL 29

To support and co-operate with promoters or operators of public and private health care facilities by facilitating and encouraging the provision of improved health care facilities in appropriate locations.’

From the above it is clear that there will need to be flexibility in terms of location as not all care facilities are best located in urban locations. Some of Nua’s clients may require tranquil, serene or restful environments in non-urban locations. The suitability of a location is dependent on the mental or intellectual disabilities presented.

This submission also proposes the following amendments to Policy SH POL 6

To support the provision of accommodation for those with physical, mental or intellectual disabilities, including older people and for people with disabilities that would allow for independent and semi-independent living in locations that are proximate to town and village

centres and services and amenities such as shops, local healthcare facilities, parks and community centres, where appropriate.

Further, whilst SOC POL 25 recognises the location of healthcare facilities within communities, we welcome the recognition in RUR POL 11 that rural locations may be appropriate for residential uses for particular people with extra support needs or require tranquil or secluded environments.

In conclusion Nua Healthcare welcomes the publication of the Draft Meath County Development Plan and request that healthcare facilities be given favourable consideration in lands zoned Community Infrastructure (G1), and that the range of permitted uses under this zoning and the zoning objective itself be made consistent.

It is also requested that the County Plan recognise the potential of sensitive reuse of redundant or underused institutional premises for care use and activity, in appropriate circumstances,

#### **Chief Executive's Response**

The Planning Authority has a significant role in supporting suitable healthcare provision through ensuring that there are sufficient lands in the Development Plan to accommodate the development of adequate healthcare facilities for the population of an area.

Healthcare and medical facilities are provided by a range of public, private and voluntary agencies. The Health Safety Executive (HSE) is the primary organisation responsible for the delivery of health care and personal social services to the people of Meath.

The ability of Primary Care Centres to provide local and integrated facilities in line with the Government's Primary Care Strategy, is acknowledged and supported by the Council. The Plan seeks to locate these facilities, together with community support services on suitably zoned lands in close proximity to new and existing residential areas to allow communities access to multi-disciplinary health care, mental health and wellbeing services in easily accessible locations throughout the County. Please refer to section 7.7.4 'Healthcare Facilities'.

#### **Chief Executive's Recommendation**

No change recommended.

<b>Submission No.:</b>	MH-C5-854
<b>Submitted by:</b>	Cllrs Sharon Keogan and Amanda Smith
<b>Submission Theme(s):</b>	Land Use Zoning
<b>Summary of Submission:</b>	
That lands that were previously dezoned in the 2013-2019 Development Plan be reviewed with regard to inclusion in the 2020-2026 Development Plan. These should include areas for community gain, a playground, outdoor recreational spaces, seating and other public realm facilities.	
<b>Chief Executive's Response</b>	
<b>See NOM 8</b>	



As part of the preparation of the Core Strategy and Settlement Strategy in the Draft Plan, an analysis of residential activity and the quantum and location of zoned land in the County has been carried out.

This analysis identified a significant excess of residential lands. A significant proportion of these lands were zoned since 2001. The primary reasons for these excess lands can be attributed to 'over zoning' and lack of services.

In addition to identifying residential lands, the preparation of the Draft Plan included an assessment of the required social and community infrastructure in each settlement. This involved meeting and liaising with various voluntary groups and organisations and government agencies.

Through this process, it is considered that this Plan has identified sufficient social and community lands to meet the needs of the population during the life of this Plan. However, as part of the Local Area Plan process, the requirement for additional facilities will be examined in greater detail.

#### **Chief Executive's Recommendation**

No change recommended