



Consultation:

DRAFT VARIATION (NO. 1) OF THE TRIM DEVELOPMENT PLAN 2014-2020

Author: Lisa Maguire

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Environmental Health Submission

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Observations:

Theme: Submissions

Title: Environmental Health Submission

comments in relation to changes proposed to Trim Development Plan

Documents Attached:

 MH-C17-5-310 - Draft Variation No 1 of Trim Development Plan 2014 - 2020.pdf

Boundaries Captured on Map: No



Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive

Dublin North East
Environmental Health Service
Co. Clinic
Navan
Co. Meath

Phone: 046 9098754
E-Mail: lisa.maguire@hse.ie

Mr. Sean Clarke
Acting Senior Executive Planner
Meath County Council
Planning Department
Buvinda House
Dublin Rd
Navan
Co. Meath

12th July 2019

Re: Draft Variation No.1 to Trim Development Plan 2014- 2020

Dear Mr. Clarke,

Please find enclosed the Environmental Health Service consultation report in relation to the Draft Variation No.1 of the Trim Development Plan 2014-2020.

If you have any queries regarding this report please contact me at Elish O'Reilly, Principal Environmental Health Officer, Co Clinic, Navan, Co. Meath.

Yours Sincerely,

Elish O'Reilly
Principal Environmental Health Officer

Draft Variation No. 1 of the Trim Development Plan 2014 – 2020

Date: 11th July 2019

The Environmental Health Service is making this submission under the remit of Healthy Ireland and relevant supporting health strategies. The aim of this submission is to incorporate relevant health actions into the strategic planning of the spatial and built environment of Trim, with the overall aim of improving the health and wellbeing of the population of the town and its environs.

Trim has been identified as a Moderate Sustainable Growth Town and has been identified as a Secondary Economic Growth Town in the county linked to Navan in a complementary & supportive role. The aim is for Trim to develop in a self-sufficient manner. Any increase in population should be in tandem with employment opportunities, capacity in physical and social infrastructure and should not be based on long distance commuting.

Proposed Variation:

The Trim Development Plan has been amended to bring it into line with the Meath Economic Development Strategy. Specific amendments considered by the Environmental Health Department include:

- To review the quantum and location of employment zoned land in Trim. Two employment based land use categories are identified; **E1-Strategic Employment Zones (High Technology Uses):** *'To facilitate opportunities for high-end technology/manufacturing and major campus style office based employment within high quality and accessible locations'* and **E2 General Enterprise & Employment:** *'To provide for the creation of enterprise and facilitate opportunities for employment through industrial, manufacturing, distribution, warehousing and other general employment.'*
- To review the appropriateness of the Masterplan Objectives in the town as they pertain to the compatibility with employment generation
- To provide for 100 residential units. The proposed residential development shall provide for Executive style housing of high architectural merit, a live-work community and the reservation of lands for educational provision.
- To provide key physical infrastructure in the form of part of the distributor road linking the Navan and Dublin Roads.
- Amendments to take account of flood risk mapping published since adoption of the Trim Development Plan (undertaken in April 2014)

The Environmental Health Service highlights the following strategies as being of relevance to the proposed changes to the Trim Development Plan.

Get Ireland Active – National Physical Activity Plan for Ireland

<http://health.gov.ie/wp-content/uploads/2016/01/Get-Ireland-Active-the-National-Physical-Activity-Plan.pdf>

Any proposed development (either employment based or housing) in the specified lands must be explored for opportunities for health gain for employees and residents alike. Opportunities for health gain should be considered at the design phase of any development.

- a) All development in this area should promote cycling and walking. A network of cycle routes and footpaths should be planned and developed which promote connectivity of any new employment centre/housing development to the town centre and existing park and recreational amenities.
- b) Recreational spaces that encourage physical activity should be planned and developed within this area.
- c) The natural environment should be explored for opportunities to maximise physical activity and recreation amenities. This should be incorporated into the design phase of any proposed development.
- d) A framework for workplace health and wellbeing, including physical activity should be developed. Any possible health gain for employees should be explored and developed.
- e) The smarter travel workplaces initiative should be promoted. Sustainable or active modes of travel should be facilitated.
- f) Ensuring planning makes provision for recreational facilities for staff in industrial estates and ensures connectivity of work to park and recreational activities.

Smarter Travel Policy

http://www.smartertravel.ie/sites/default/files/uploads/2012_12_27_Smarter_Travel_english_PN_WEB%5B1%5D_0.pdf

To support smarter travel there should be a strategic aim to:

- a) Specify a maximum permitted level of car parking for commercial sites, which have suitable public transport facilities and are within walking/cycling distance to amenities.
- b) Set targets requiring a minimum percentage of new residential and mixed-use development to take place on brownfield/existing sites to consolidate urban growth and enable organic development of urban areas from the centre out.
- c) Developments above a certain scale should have viable travel plans in place and establish e-working centres to provide opportunities for people to work from a location closer to home.
- d) Provide facilities such as secure bike parking and changing/showering facilities at places of employment to encourage staff to cycle.
- e) Reprioritise traffic signals to favour pedestrians instead of vehicles, reducing waiting times and crossing distances at junctions.

- f) Create level grade crossings for pedestrians across junctions. Create larger traffic-free areas in the town centre. Ensure that 30 km/h zones are designated in central urban areas which accommodate motorised traffic.
- g) Widen footpaths where there are high pedestrian flows, particularly close to public transport nodes. Improve the surface quality of footpaths. Provide appropriately designed safe, well-lit, direct, continuous facilities for pedestrians.
- h) Support private and public sector initiatives to establish car club schemes. Provide on-road parking spaces to be designated for car clubs through appropriate signage.
- i) Establish park and ride facilities along major public transport nodes, at the periphery of Trim and at key public transport locations and nodes.

National Cycle Policy Framework

http://www.smartertravel.ie/sites/default/files/uploads/2013_01_03_0902%2002%20EnglishNS1274%20Dept.%20of%20Transport_National_Cycle_Policy_v4%5B1%5D%5B1%5D.pdf

Any new development should include the needs of cyclists, and in particular:

- a) Implement measures to reduce the volumes of through-traffic, especially HGVs.
- b) Introduce traffic calming measures, enforce low traffic speeds, make junctions safe for cyclists.
- c) Ensure that all surfaces used by cyclists are maintained to a high standard and are well lit and signposted.
- d) Provide secure cycling parking at all destinations of importance to the cyclist
- e) Aim to integrate cycling and public transport and provide cycling parking at all public transport interchanges.
- f) Ensure that the urban road infrastructure (with the exception of motorways) is designed / retrofitted so as to be cyclist-friendly. Link up all existing cycle lanes.

Healthy Ireland - A Healthy Weight For Ireland

<http://health.gov.ie/wp-content/uploads/2016/09/A-Healthy-Weight-for-Ireland-Obesity-Policy-and-Action-Plan-2016-2025.pdf>

The strategic plan for Trim should include the development of guidelines and support materials to reduce the obesogenic environment and it should support development that creates environments that make the healthy choice the easy choice. Planning for any new employment centre should have cognisance of the following:

- a) Promote through planning and the built environment the benefits of healthy eating, physical activity and non-sedentary behaviour.

- b) Improve availability of and access to healthier food choices.

The National Positive Ageing Strategy

http://health.gov.ie/wpcontent/uploads/2014/03/National_Positive_Ageing_Strategy_English.pdf

Suitable housing is a key aim in the National Positive Ageing Strategy and a key strategic aim for any housing development in Trim should be to:

- a) Promote lifetime adaptable housing and design and the use of assistive technologies. All residential development should incorporate the 'Universal Design' Principal to ensure housing can meet the needs of the occupants regardless of their age, size, ability or disability. This will also ensure that the houses provided will meet their changing needs over time so that people can continue living in their own homes and communities as they get older or become disabled.

Universal Design Guidelines For Homes In Ireland

<http://universaldesign.ie/Built-Environment/Building-for-Everyone/>

- b) This will also assist in implementing the Older People Remaining at Home (OPRAH) strategy.
- c) Any Housing Development should incorporate the principals outlined in the 'Design Out Crime' Document.

http://www.designcouncil.org.uk/sites/default/files/asset/document/designers_Guide_digital_0_0.pdf

Time to move on from congregated settings – A strategy for community inclusion

<http://www.hse.ie/eng/services/list/4/disability/congregatedsettings/congregatedsettingsreportfinal.pdf>

Planning for the new Residential and Industrial/Employment zones in Trim should have cognisance of the following:

- a) Improve community inclusion of people with disabilities in their local community and community based services.
- b) Focus on meeting the housing and accommodation needs of people with disabilities. A local re-housing plan should be prepared and jointly co-ordinated with the HSE, in collaboration with service providers. The plan

- should be based on best practice in including people with disabilities in local communities and should facilitate dispersed housing with personal supports.
- c) Consideration to reserving a certain proportion of dwellings for people with disabilities.
 - d) Focus on supporting and sustaining people with disabilities to live in their own homes in the community through the provision of housing grants.
 - e) Support people with disabilities to access employment and education opportunities.
 - f) Support people with disabilities to access mainstream community services.

Lack of housing diversity is often acknowledged as a problem in commuter towns throughout the greater Dublin area. To ensure sustainable development with a diversity and mix of uses the Environmental Health Service recommends any proposed housing/residential development is made up of a variety of household types, tenures and typologies, thereby creating a range of lifestyle, affordability and lifespan choices. To ensure proportion between the proposed development and the existing landscape and allow for balance between the natural and built environment it is also recommended that all residential and industrial development proposed for Trim is accompanied by a detailed design statement.

Sustainable Development

Our sustainable future – A Framework for Sustainable Development

<http://www.housing.gov.ie/sites/default/files/migrated-files/en/Publications/Environment/Miscellaneous/FileDownload%2C30452%2Cen.pdf>

The Dail had declared a climate and biodiversity emergency. We are the last generation that can impact the course of climate change and we must be very conscious of the need to manage effectively all activities which impact on our environment.

The proposals outlined in Meath County Councils Climate Change Action Plan must be adhered to and all future development, both residential and industrial, should be designed so as to reduce its carbon footprint. Environmentally friendly proposals such as the integration of public transport infrastructure, building typologies that minimise the use of energy, SuDS management initiatives and the integration and utilisation of open space should all be explored and incorporated into the design stage of any development.

Energy

Ireland's Second National Energy Efficiency Action Plan to 2020

http://www.seai.ie/Publications/Energy_Policy_Publications/Energy_Service_Companies/Ireland%E2%80%99s_second_National_Energy_Efficiency_Action_Plan_to_2020.pdf

Any new development should;

- a) Promote and facilitate the incorporation of energy efficient design into projects.
- b) Develop and implement an energy management programme for all buildings.
- c) Water conservation measures should implemented in any new development.

Research 195: Health Benefits from Biodiversity and Green Infrastructure

<http://www.epa.ie/pubs/reports/research/health/research195.html>

It is recommended that all future developments are explored for the opportunity to integrate green infrastructure into the design at planning stage. Any potential for health gain should be explored and incorporated into all development.

For amenity purposes at least 9m² /person of accessible open green space are recommended by the World Health Organization, however it is recognised that this may vary depending on the size of the city, the number of inhabitants and where boundaries are drawn (Dzhambov et al., 2014).

It is recommended that the following recommendations are considered when planning for residential and industrial areas:

- a) Green biodiverse spaces should be designed so that there is at least one within walkable distance from people's homes, as it made people happy that nature was close by (Zelenski and Nisbet, 2014).
- b) Green spaces should be co-designed with communities and reflect local needs.
- c) Areas should be as large as possible with connections through flowery verges or linear habitats alongside paths and roads.
- d) Areas should be relatively open, but grass does not all have to be the same length. This design could suggest careful, rather than a lack of, management. Interpretative signage can explain the practice and highlight signs of nature to look out for.
- e) A few scattered trees or clumps of trees are preferable to dense planting of trees.
- f) Paths, recreational areas and places to relax and engage with nature should be incorporated from the start, to promote use and maintain a feeling of safety. It is recommended all proposed green areas are provided with paths for walking.
- g) Exercise areas, trails and paths need to provide maximum contact with green space, as this made exercise accessible and nature contact motivated people to walk more.

- h) Not all areas should be managed to the same intensity. Some parts near paths could be managed more to look tidy, whereas stakeholders recognised the value of incorporating wild areas, which could be further away from paths.
- i) Biodiversity areas can be designed to accommodate playgrounds and other amenity areas. Most stakeholders recognised the value of being able to spot wildlife.

Biodiversity & Green Areas

Actions for Biodiversity

<https://www.npws.ie/sites/default/files/general/national-biodiversity-plan-english.pdf>

With regards to biodiversity it is the government's objective '*to mainstream biodiversity in the decision making process*' and '*to conserve and restore biodiversity and ecosystem services in the wider countryside.*'

Green spaces should be provided throughout the proposed housing and industrial developments. To further reinforce this it is recommended that a Biodiversity Action Plan should be developed for Trim. Guidance on managing Biodiversity in strategic planning and urban areas is found in:

http://www.uep.ie/pdfs/guidelines_complete.pdf

Consideration should be given to the implementation of green infrastructure and the provision of 'green' walkways throughout the proposed developments which will promote physical activity and also facilitate the movement of fauna.

Waste

A Resource Opportunity – Waste Management Policy in Ireland

https://www.epa.ie/pubs/reports/waste/plans/Resource_Opportunity2012.pdf

A waste policy specific to Trim should be developed, which aims to implement the Waste Hierarchy as set out in the Waste Framework Directive and place prevention and minimisation at the forefront.

- a) Disposal of municipal waste to landfill should be a last resort.
- b) Implement waste prevention and reduction initiatives and incentives in the home and for business.
- c) A Reuse Policy should be developed in consultation with relevant bodies and employers, to ensure that full consideration is given to feasible reuse options before embarking on the purchase of new goods.

Environmental Noise

The World Health Organisation (WHO) has identified Environmental Noise as an increasing cause of ill health and detrimental effect on health and wellbeing.

http://www.euro.who.int/_data/assets/pdf_file/0008/136466/e94888.pdf

- a) The development of any new employment centre, industrial operations, workshops and factories in the newly zoned area or any residential developments should consider and assess the impact of noise at the design and planning stage.
- b) It should be a Strategic aim of the Trim Town Development Plan to map noise and implement Noise Action Plans as per EPA Guidance:
<http://www.epa.ie/pubs/advice/noisemapping/epaguidancenotefornoiseactionplanning.html>

Air Quality

Any new development should have an aim to reduce polluting emissions into air and increase the quality of air in Trim. The Council should produce Local Air Quality Management Plans that identify pollution 'hot spots' and aim to reduce pollution through local action on emissions.



Lisa Maguire
Environmental Health Officer