



Planning Department
Meath County Council
Buvinda House
Dublin Road
Navan
Co. Meath
C15 Y291

Dáta | Date
15 July, 2019

Ár dTag | Our Ref.
TII19-106141

Re: Draft Variation no. 3 to the Navan Development Plan, 2009 - 2015

Dear Sir/Madam,

TII acknowledges and welcomes receipt of public notice concerning proposed Draft Variation no. 3 to the Navan Development Plan, 2009 – 2015. The draft variation proposes alterations to development objectives impacting Settlement Strategy OBJ16 and the specific site objective relating to Masterplan 10.

Masterplan 10 is situated on lands to the south of Navan and was initially identified as a site option for a Regional Hospital in the adopted Navan Town Development Plan, 2009 – 2015. The Plan also identified that it was not anticipated that this Strategic Land Reserve will serve any other purpose other than a Regional Hospital and ancillary healthcare provision.

Draft Variation no. 3 now proposes to extend the permissible land uses in the Masterplan 10 lands to include an employment hub in line with land use designations E1/E2 Strategic Employment Zones (High Technology Uses)/General Enterprise and Employment and the range of uses permissible in such zoning categories. In relation to such proposed changes, TII outlines the following observations for the Councils consideration.

a) Area Based Transport Assessment

In relation to the development of the subject Masterplan lands, TII previously outlined observations on this matter to Meath County Council on proposed Variation no. 2 to the Town Plan and on the Part VIII proposal for 'LDR 1B' Proposed Distributor Road.

TII considers it critical that the Masterplan 10 lands are subject to an appropriate transport assessment and the Masterplan incorporates consultation with relevant stakeholders including TII and the NTA prior to adoption. This is particularly relevant having regard to proposals included in Draft Variation no. 3 which increases the range and type of development proposed to be accommodated in the Masterplan area. Advice and guidance in relation to area based transport assessment is available at TII Publication Number PE-PDV-02046 (Area Based Transport Assessment) prepared in collaboration between TII and the NTA to ensure an integrated approach to transport and land use planning.



b) Masterplan Statutory Processes

With regard to the framework to agree Developer led Masterplans for the agreement of the Executive of the planning authority, the Council will be aware of the observations made by TII in relation to this matter on Variation no. 3 to the Meath County Development Plan, 2013 – 2019. The Authority's position remains as set out previously.

The Authority considers that the approach advocated in Section 3.2 of the Town Development Plan to be inappropriate given the strategic national road network issues relevant to area, particularly having regard to proposed road links facilitating development of the area and connection to the N3 Kilcarn Link Road, an 'exceptional circumstance' agreed in the adopted County Development Plan.

With regard to the approach to require developer led Masterplans, TII would draw the Councils attention to the provisions of both the DoECLG Local Area Plan Guidelines and DoECLG Sustainable Residential Development in Urban Areas Guidelines which advise that such plans can supplement or complement but not replace statutory plans. Although the Council will note that the Guidelines refer primarily to non-statutory studies or frameworks prepared by local authorities and not developers.

Also, the DoECLG Sustainable Residential Development in Urban Areas Guidelines advise that if it is intended to use such non-statutory documents for development management, planning authorities should incorporate them in the development plan or local area plan for the area by way of variation and where possible, public consultation should be integrated into the preparation on non-statutory frameworks. This is not evident in the proposals included in Section 3.2 and the current proposed Draft Variation no. 3.

The Council will be aware that the DoECLG Spatial Planning and National Roads Guidelines require that development should be Plan-led. The promotion of developer led masterplan exercises without consultation and liaison by the local authority with TII and in the absence of strategic transport evidence base requirements is considered inappropriate and leads to substantial risks for future development.

The DoECLG Guidelines require that planning authorities must also ensure that they consult with the NRA (now TII) in preparing any local area plans or other non-statutory plans where there may be material implications for national roads.

Conclusion

The Authority requests that the issues identified in the foregoing are resolved in order to address the deficiencies in consultation, liaison and evidence base requirements related to proposed Masterplanning exercises in the current Town Development Plan and in Draft Variation no. 3.

It is requested that the foregoing comments and observations are taken into consideration in the adoption of Draft Variation no. 3 to the Navan Development Plan, 2009 – 2015.

Yours sincerely,



Michael McCormack
Senior Land Use Planner