

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

On-line consultation portal; <https://consult.meath.ie/>

Dáta | Date
22 June, 2021

Ár dTag | Our Ref.
TII21-113494

Re. Proposed Material Amendments to the Draft Meath County Development Plan, 2021 - 2027

Dear Sir/Madam,

TII acknowledges receipt of referral of Proposed Material Amendments to the Draft Meath County Development Plan, 2021 - 2027. The Authority welcomes the Proposed Material Amendments arising from consideration of the Authority's initial submission on the Draft Plan. In relation to other Proposed Material Amendments on display, TII outlines the following observations;

1. Volume 1 Draft Development Plan Material Amendments

1.1 Proposed Amendment Chapter 4.7

TII observes Proposed Material Amendment Chapter 4.7 which outlines the Councils policy to positively consider and assess development proposals for the expansion of existing authorised industrial or business enterprises in the countryside subject to certain provisions.

Recommendation:

In the interests of adhering to the provisions of official policy concerning development management and access to national roads, TII welcomes that the Proposed Material Amendment identifies that the policy will not apply to the national road network. TII supports this clarification and considers it a critical element to remain if the Proposed Material Amendment is adopted.

1.2 Proposed Amendment Chapter 5.18

TII notes proposals to amend the text associated with the Leinster Orbital Route (LOR) outlined in Proposed Amendment Chapter 5.18.

The LOR is identified as a national road scheme included in the NTA Transport Strategy for the Greater Dublin Area, 2016 – 2035. The Strategy recommends the finalisation of the route corridor and its protection from development intrusion.

In accordance with the provisions of Section 2.9 of the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012) development objectives must not compromise the route selection process for road scheme planning.

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Bonneagar Iompair Éireann
Ionad Gnó Gheata na Páirce
Sráid Gheata na Páirce
Baile Átha Cliath 8
Éire, D08 DK10



Transport Infrastructure Ireland
Parkgate Business Centre
Parkgate Street
Dublin 8
Ireland, D08 DK10



info@tii.ie



www.tii.ie



+353 (0)1 646 3600



+353 (0)1 646 3601

Having regard to the above, there is an onus on the planning authority to safeguard the future planning and design for the LOR and ensure objectives included in the Development Plan do not compromise this.

TII is of the opinion that the text proposed in Proposed Amendment Chapter 5.18 which refers to reserving and protecting the route corridor of the LOR when finalised presents challenges for the planning and design process, particularly the need to preserve and protect route options pending a finalised design needs to be revised.

Recommendation:

TII recommends consideration being given to the following text amendments for inclusion in Proposed Amendment Chapter 5.18, consistent with TII's initial observations on the Draft Plan, and the requirements of the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities to ensure that development objectives do not compromise the route selection process for the LOR;

MOV POL 23

To support the ~~reservation of the indicative route~~ **delivery** of the Leinster Outer Orbital Route, which is considered to comprise important infrastructural development, and ~~when finalised~~ **to protect the route corridor and corridor options**, free of developments which could interfere with the provision of the project.

MOV OBJ 33

~~When finalised and agreed,~~ To reserve the **route corridor and corridor options** ~~indicative route~~ of the Leinster Outer Orbital Route free of developments which could otherwise interfere with the provision of the project.

1.3 Proposed Amendment Chapter 5.20

TII acknowledges the proposed text amendment outlined in Proposed Amendment Chapter 5.20 which indicates the Councils objective to support and facilitate the delivery of an N2 Bypass to the east of Slane Village.

TII Acknowledges that the N2 Slane Bypass road scheme planning and design is being advanced by Meath County Council. The road scheme is included as a project to be advanced in the National Development Plan, 2018 – 2027. TII supports provision made to facilitate and provide for the N2 Slane Bypass.

Recommendation

With regard to the proposed text amendments, TII recommends that the Council ensure that the approach proposed accords with the progression of the Scheme in accordance with TII Publications, Standards and Codes of Practice and EU and National environmental legislative requirements.

1.4 Proposed Amendment Chapter 5.23 and Proposed Amendment Chapter 5.26

TII welcomes and supports the proposed text amendments associated with Proposed Amendment Chapter 5.23 and Proposed Amendment Chapter 5.26 which clarify the Councils policy on access to national roads consistent with the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012).

1.5 Proposed Amendment Chapter 5.25

TII notes proposed amendment to Table 5.1 'Proposed Road Schemes' outlined in Proposed Amendment Chapter 5.25 and welcomes the included reference to national road schemes identified for delivery in the National Development Plan, 2018 – 2027.

As outlined in TII's initial submission on the Draft Plan, the Council will be aware that the implementation of all national road schemes is subject to budgetary constraints and is subject to prioritisation and adequacy of the funding resource available to the Authority. In these circumstances and taking account of the Exchequer financial position and levels of funding available to the Authority, the relative priority or timeframe for national road schemes may be subject to alteration.

The Authority's priorities in relation to national roads in County Meath, including the identified NDP Major Schemes, also includes the maintenance of the existing national road network, including junctions, and safeguarding the Exchequer investment in national roads to date.

As outlined in TII's submission on the Draft Plan, the Authority notes the inclusion of schemes in Table 5.1 of the Draft Plan many of which are in addition to the schemes included in the National Development Plan. While such additional improvements relating to national roads identified at a local level should be done so in consultation with and subject to the agreement of TII, the Council will be aware that TII may not be responsible for the funding of any such schemes or improvements. While proposals should be developed complementary to safeguarding the strategic function of the national road network, proposals impacting on the national road network should be developed in consultation with and subject to the agreement of TII.

Recommendation

TII notes proposals including for the addition of new junctions and the improvement and upgrading of existing national road junctions on the national motorway network. TII is not aware of the basis for or any case supporting such improvements where such proposals are not catered for in National Development Plan objectives. The Council will be aware that such enhancements to national road junctions are required to be progressed in accordance with Section 2.7 of the DoECLG Spatial Planning and National Roads Guidelines (2012).

1.6 Proposed Amendment Chapter 9.1

TII notes that Proposed Amendment Chapter 9.1 proposes to retain the existing Rural Development Chapter from the previous Meath County Development Plan, 2013 – 2019.

The existing Rural Development Chapter from the Meath County Development Plan, 2013 – 2019, includes a number of policy areas and development categories which due to their nature and character could have a significant impact on the national road network if not planned and developed appropriately, for example, rural residential development, agriculture/agricultural diversification, extractive industries, tourism, etc. It is noted that Section 10.16 addresses restrictions on access to national roads.

Recommendation

In the interests of consistency with the policies included in Chapter 5 Movement Strategy and Section 5.9.1 'National Roads' of the Draft Plan and the DoECLG Spatial Planning and National Roads Guidelines, concerning access to national roads, TII recommends an appropriate cross reference with proposed policy MOV POL 24 and appropriate update and revision to policies RD POL 36 and RD POL 37 of the Rural Development Chapter from the Meath County Development Plan, 2013 – 2019;

RD POL 37 To ensure that future development affecting national primary or secondary roads, shall be assessed in accordance with the guidance given in the document 'Spatial Planning and National Roads - Guidelines for Planning Authorities' **2012 to avoid the creation of any additional development access to national roads and intensification of existing access to national roads to which speed limits greater than 60kph apply, save in accordance with agreed 'exceptional circumstances' included in MOV POL 33.**

1.7 Proposed Amendment Chapter 11.1

It is noted that Proposed Amendment Chapter 11.1 introduces an updated Development Management Standards Chapter.

Section 11.6.5 addresses Service Stations. TII welcomes reference to the guidance included in the DoECLG Spatial Planning and National Roads Guidelines. In addition, the TII Policy on Service Areas (August, 2014) outlines TII's policy in relation to the provision of on-line service areas.

Recommendation

TII would welcome the Development Plan development management provisions being updated to include reference to the TII Policy on Service Areas (August, 2014) prior to adoption.

2. Volume 2 Draft Development Plan Settlement Plan Material Amendments

2.1 Approach to Masterplanning

A number of Settlement Plans included in the Draft Development Plan include provision for undertaking Masterplanning exercises for specific locations but limited information is provided pertaining to the proposed exercise and agreement and adoption processes to be applied.

In accordance with official policy provisions, TII is of the opinion that where such masterplans are proposed to be used to inform development management decisions, particularly in relation to areas with the potential to impact the strategic national road network, planning authorities should incorporate them in the development plan or local area plan and where possible, public consultation should be integrated into their preparation.

TII has previously raised concern with Meath County Council with the approach proposed to masterplanning in the County Development Plan. In the interests of clarification, those concerns are reiterated as follows;

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 (masterplans or similar non-statutory plans) can supplement or complement but not replace statutory plans.

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.

Primary concerns relate to the absence of appropriate Plan-led evidence based planning and the absence of future liaison and collaboration with TII in relation to planning exercises promoted by the local authority that have significant implications for the strategic national road network in the area concerned. The Authority considers that such issues can be addressed with collaboration and should be addressed in advance of adoption of the Draft Plan and respective Settlement Plans.

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

The DoECLG Spatial Planning and National Roads 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.

Recommendation

The Authority requests that this issue of Masterplanning is addressed throughout the proposed Draft Plan and associated Settlement Plans to address the deficiencies in consultation, liaison and evidence base requirements clearly required by official policy provisions. The Council will be aware that TII/NRA and Meath County Council have had highly effective collaboration on such issues in the past which has successfully facilitated Plan-led strategic economic development proposals in the County in both a forward planning and development management context.

2.2 Ashbourne

a. Proposed Ashbourne Amendment no. 6

The Proposed Amendment proposes to amend the zoning of an extensive area of land to E1/E3 Employment and designate as a new Strategic Employment Site for Ashbourne. The Draft Plan also appears to retain a Masterplan Objective (MP20) on the lands. The lands in question are located in proximity to M2 Junction 3 (Ashbourne South).

National Strategic Outcome 2 of the National Planning Framework includes the objective to maintain the strategic capacity and safety of the national roads network. It is also an investment priority of the National Development Plan, 2018 – 2027, to ensure that the extensive transport networks which have been greatly enhanced over the

last two decades, are maintained to a high level to ensure quality levels of service, accessibility and connectivity to transport users. This requirement is further reflected in the recent publication of the Draft National Investment Framework for Transport in Ireland as well as the existing Statutory Section 28 Spatial Planning and National Roads Guidelines for Planning Authorities.

The DoECLG Spatial Planning and National Roads Guidelines advise that planning authorities must exercise particular care in their assessment of development/local area plan proposals relating to the development objectives and/or zoning of locations at or close to interchanges where such development could generate significant additional traffic with potential to impact on the national road.

TII is not aware of any analysis undertaken by the Council to develop an evidence base, in accordance with the provisions of official policy, to establish potential implications for the strategic national road network in the area and to support the proposed zoning at this location.

It is unclear if the zoning proposal adjoining the national road network and associated junctions have been subject to appropriate transport assessment or transport modelling or development of appropriate mitigation measures. This approach would be a basic requirement for any evidence based approach to demonstrate that proposed trip generation can to be catered for, while protecting the strategic function of the national road network.

Recommendation

The Authority is of the opinion that it is premature to adopt the Proposed Amendment in the absence of the required evidence base and plan-led approach required by Section 28 Ministerial Guidelines on Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012).

b. Proposed Ashbourne Amendment no. 8

In relation to proposals to zone additional lands to 'New Residential' in Proposed Ashbourne Amendment no. 8, the lands in question adjoin the M2, national road. No mitigation or set back standard appears to be applied to the future development of the lands to avoid adverse effects from the motorway on new residential development.

Recommendation

In the interests of adhering to the provisions of official policy, TII recommends that the Council consider addressing and incorporating the requirements of Section 3.7 of the DoECLG Spatial Planning and National Roads Guidelines prior to the adoption of the Proposed Amendment in relation to avoiding adverse impacts from existing and future national roads.

c. Proposed Ashbourne Amendment no. 12

TII notes the Proposed Amendment proposes alteration to the text associated with Masterplan 2 (now MP 19). TII commented on the zoning of additional employment lands to the north of Ashbourne, extending to the line of the M2 in the Authority's initial submission on the Draft Plan and the comments previously provided remain the position of TII.

Recommendation

In relation to the proposal to subject the lands to a Masterplan 'awaiting preparation', the comments above related to Section 2.1 Masterplanning provisions in the Development Plan apply. TII advises that it does not support the approach to non-statutory Masterplanning currently outlined in the Draft Plan and in particular for these lands.

2.3 Dunboyne/Clonee/Pace

a. Proposed Dunboyne/Clonee/Pace Amendment no. 5

TII notes proposals to correct the indicative road links through Masterplan lands MP 2 and MP 3 outlined in Proposed Dunboyne/Clonee/Pace Amendment no. 5.

Recommendation

In relation to such road links, TII recommends that the Council confirm that proposals adhere to the provisions of the agreed Transport Study at Dunboyne and Environs (2018).

In relation to the proposal to subject the lands to a Masterplan, the comments above related to Section 2.1 Masterplanning provisions in the Development Plan apply. TII advises that it does not support the approach to non-statutory Masterplanning currently outlined in the Draft Plan and in particular for these lands.

2.4 Dunshaughlin

a. Proposed Dunshaughlin Amendment no. 2

TII notes proposals to amend the zoning from 'Rural' to 'E2 General Enterprise and Employment' on lands adjoining M3 Junction 6 and subject to Proposed Dunshaughlin Amendment no. 2.

TII acknowledges the planning history of the subject site, file ref. RA160148, and the refusal of permission for an off-line service area at this location by An Bord Pleanála under case ref. PL 17.246554.

National Strategic Outcome 2 of the National Planning Framework includes the objective to maintain the strategic capacity and safety of the national roads network. It is also an investment priority of the National Development Plan, 2018 – 2027, to ensure that the extensive transport networks which have been greatly enhanced over the last two decades, are maintained to a high level to ensure quality levels of service, accessibility and connectivity to transport users. This requirement is further reflected in the recent publication of the Draft National Investment Framework for Transport in Ireland as well as the existing Statutory Section 28 Spatial Planning and National Roads Guidelines for Planning Authorities.

The DoECLG Spatial Planning and National Roads Guidelines advise that planning authorities must exercise particular care in their assessment of development/local area plan proposals relating to the development objectives and/or zoning of locations at or close to interchanges where such development could generate significant additional traffic with potential to impact on the national road.

TII is not aware of any analysis undertaken by the Council to develop an evidence base, in accordance with the provisions of official policy to establish potential implications for the strategic national road network in the area and to support the proposed zoning at this location.

It is unclear that the zoning proposal has been subject to appropriate transport assessment or transport modelling or development of appropriate mitigation measures. This approach would be a basic requirement for any evidence based approach to demonstrate that proposed trip generation can to be catered for, while protecting the strategic function of the national roads network.

Recommendation

Having regard to the foregoing, TII would not support the proposed zoning amendment as currently displayed. There appears to be other lands more favourably located to consolidate the growth of Dunshaughlin and achieve compact growth in accordance with Government policy and that do not have the potential to adversely impact the national road network at variance with the Spatial Planning and National Roads Guidelines for Planning Authorities.

2.5 South Drogheda

a. Proposed South Drogheda Amendment no. 5

Proposed South Drogheda Amendment no. 5 proposes to incorporate a Masterplan boundary for Masterplan MP 14 to the proposed land use zoning map.

Recommendation

In relation to the proposal to subject the lands to a Masterplan, the comments above related to Section 2.1 Masterplanning provisions in the Development Plan apply. TII advises that it does not support the approach to non-statutory Masterplanning currently outlined in the Draft Plan and in particular for these lands.

2.6 Slane

a. Proposed Slane Amendment no. 1 and Proposed Slane Amendment no. 2

TII acknowledges the proposed text amendments outlined in Proposed Slane Amendment no. 1 and Proposed Slane Amendment no. 2 as well as Proposed Amendment Chapter 5.20, discussed above, which indicate the Councils objective to support and facilitate the delivery of an N2 Bypass to the east of Slane Village. TII

acknowledges that the N2 Slane Bypass road scheme planning and design is being advanced by Meath County Council. The road scheme is included as a project to be advanced in the National Development Plan, 2018 – 2027.

Recommendation

As noted above, TII supports provision made to facilitate and provide for the N2 Slane Bypass. With regard to the proposed text amendments, TII recommends that the Council ensure that the approach proposed does not conflict with progression of the Scheme in accordance with TII Publications, Standards and Codes of Practice and EU and National environmental legislative requirements.

2.7 Trim

a. Proposed Trim Amendment no. 6

TII notes proposals to zone additional lands on the R154 Dublin Road for a combination of 'G1 Community Infrastructure' and 'D1 Tourism'.

The Leinster Orbital Route (LOR) Corridor Protection Study (2009) provided to the Council indicates that the lands subject to a new zoning proposal under Proposed Trim Amendment no. 6 are situated within a 'Junction Protection Zone'. Accordingly, zoning the lands as proposed has the potential to conflict with the proposed LOR. As already indicated, the LOR is identified as a national road scheme included in the NTA Transport Strategy for the Greater Dublin Area, 2016 – 2035. In accordance with the provisions of Section 2.9 of the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012) development objectives must not compromise the route selection process for road scheme planning.

Recommendation

The proposal to zone the lands subject to Proposed Trim Amendment no. 6 requires review by the Council to ensure the proposed zoning objectives do not conflict with the planning, design and delivery of the LOR.

Conclusion

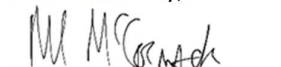
As outlined above, TII acknowledges and welcomes proposed amendments to the Draft Plan that arise following the Council's consideration and assessment of TII's initial submission.

There also remains specific provisions of the Draft Plan of which the Authority requested review prior to adoption which are not subject to proposed amendment. The Authority's position in relation to these items remains as set out in TII's submission on the Draft Development Plan of 27 February, 2020.

In relation to the Proposed Material Amendments on display, TII respectfully requests that the foregoing observations are taken into consideration by the Council prior to finalising the Development Plan. TII has identified a number of proposed amendments and provisions which, in TII's opinion, require review prior to adoption to ensure that the Development Plan provisions adhere to the provisions of official policy, in particular;

- The Council's approach to non-statutory masterplanning objectives throughout the Development Plan and associated Settlement Plans,
- Proposed Amendments to text associated with the LOR, an objective of the NTA Transport Strategy for the Greater Dublin Area, 2016 – 2035,
- Settlement Plan Zoning Amendments included in the Ashbourne, Dunshaughlin and Trim Settlement Plans.

Yours sincerely,



Michael McCormack
Senior Land Use Planner