



Planning Department  
Meath County Council  
Buvinda House  
Johnstown  
Navan  
Co. Meath

29<sup>th</sup> June 2021

**RE: Meath County Council Draft Development Plan 2021-2027  
Submission on behalf of  
Rockmill Ltd in relation to Material Amendments.**

Dear Sir/Madam

In response to the publication of the proposed material amendments to the Draft County Development Plan 2021 – 2027 please note that Brady Hughes Consulting has been appointed by Rockmill Ltd., Fortfield House, Colpe, Drogheda, Co. Meath to make the following submission on their behalf.

This submission relates to what proportion of C1 zoned lands can be developed for residential and non-residential purposes.

**Draft County Development Plan**

We note that the Draft Plan at chapter 11 included Development Management Objective 13 which encourages density of 35 units per hectare on certain zoned lands including C1 lands.

**DM OBJ 13**

To encourage a density of 35 units/ha on town centre and edge of centre sites in Self Sustaining Growth Towns and Self Sustaining Towns on lands with an A2 residential land use zoning objective and on B1 (Town Centre)/C1(Mixed Use)<sup>10</sup> zoned lands as part of a mixed use development.

<sup>9</sup> A maximum 30% of any development on C1 or B1 zoned lands can comprise of residential development, please refer to Chapter 2 Core Strategy for further details

<sup>10</sup> A maximum 30% of any development on C1 or B1 zoned lands can comprise of residential development, please refer to Chapter 2 Core Strategy for further detail.

The foot note (10) attached to the C1 lands referenced in DM OBJ 11 allows for ‘a maximum of 30% of any development on C1 or B1 can comprise of residential development’.

It is noted that this apparently reference to 30% residential development on C1 / B1 zoned lands has been omitted in the revised Chapter 11 prepared at Material Alterations stage. This is welcomed.

We note that Chapter 11 gave the following guidance as to what types of development would be permissible on C1 Zoned lands.

<b>C1 Mixed Use</b>  <b>Objective:</b> To provide for and facilitate mixed residential and employment generating uses	Lands identified for mixed use development are only appropriate in higher tier settlements. The objective on these lands is to provide opportunities for high density mixed use employment generating activities that also accommodate appropriate levels of residential development thereby facilitating the creation of functional 'live work' communities. These areas are generally located in proximity to high frequency public transport corridors.  In order to achieve balanced development the percentage of residential development in C1 zones shall generally not exceed 50 % of the quantum of development.
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The final paragraph provides that the percentage of residential development in C1 zones shall generally not exceed 50% of the quantum of development. This means that the quantum of residential development to be provided in any given C1 zone should generally not exceed 50% i.e. within the C1 Zoned lands rather within any given development proposal. This allows for phased development of C1 Zoned which might see commercial development and/or community facilities delivered on part of a given area of C1 zoned land, in advance of residential applications in the balance of the C1 zone.

### **Proposed Minor Modifications to the Material Amendments**

The Material Alterations published by the Planning Authority included a fully revised version of Chapter 11 (Development Management Standards and Land Use Zoning Objectives). This section of the current submission proposed minor modifications to the Material Amendments in order to provide improved clarity on the development of C1 zoned lands in the county.

## **Plot Ratio**

There are a number of amendments proposed to Chapter 11 that impact the potential development of C1 zones. These include the new section on Plot Ratio (Section 11.5.4) which includes the statement '*A maximum 50% of any development on C1 zoned lands can comprise of residential development, please refer to Chapter 2 Core Strategy for further details*'

### **11.5.4 Plot Ratio**

Plot ratio seeks to control the mass and bulk of buildings to prevent the adverse effect of over-development whilst ensuring the efficient and sustainable use of serviced land. Plot ratio is calculated as the gross building(s) floor area divided by the gross site area. For clarity, the gross floor area is the sum of all floor space within the external walls of the buildings, excluding basement, plant, tank rooms and above level car parking areas with the gross site area constituting all land within the curtilage of the site.

To ensure an appropriate level of development, plot ratio standards need to be used in combination with other development management standards, including site coverage, building height, public and private open space, and parking provision. Plot ratio will apply to both new buildings and extensions to existing buildings. A maximum 50% of any development on C1 zoned lands can comprise of residential development, please refer to Chapter 2 Core Strategy for further details. A maximum 30% of any development on B1 zoned lands can comprise of residential development, please refer to Chapter 2 Core Strategy for further detail in this regard and Section 14 'Land Use Zoning Objectives' within this chapter.

While it is unclear how the foregoing statement relates to the overarching topic of plot ratio, it would appear that the aim of this limitation relates to core strategy and seeks to ensure that C1 zones should have a maximum of 50% residential development. It is considered that this statement would correctly be interpreted as relating to the overall development of any given C1 zoned area (i.e. rather than relating to the percentage of residential development within any specific planning application).

However, the phrase '*any development*' could potentially be misunderstood as limiting individual applications for residential development where non-residential uses in C1 zones already exist. This would limit infill opportunities on such sites by potentially requiring that individual applications include for a minimum 50% non-residential, even when the objective of delivering more than 50% non-residential uses has already been achieved in a given C1 zone.

### **Requested Modification**

In the first instance, as the text above relating to the percentage of residential development on C1 and B1 zoned lands does not bear any obvious relevance to Plot Ratio (which is the subject of this section of Chapter 11), it is considered that the text may have been included in error and should therefore be omitted.

In any event, it is respectfully submitted that Section 11.5.4 should be amended to remove the wording relating to a maximum of 50% residential development on C1 zoned lands, and instead

should refer to the objective of achieving an appropriate balance and mix of uses in any one location. This would be appropriate due to the fact that a limit of 50% residential development is considered overly prescriptive and fails to recognise that the appropriate mix to be achieved on different areas of C1 zoned land will vary significantly from location to location.

On this basis, it is requested that the second paragraph of Section 11.5.4 be modified as follows (deletion in red and struck through, and proposed text in green):

*To ensure an appropriate level of development, plot ratio standards need to be used in combination with other development management standards, including site coverage, building height, public and private open space, and parking provision. Plot ratio will apply to both new buildings and extensions to existing buildings. ~~A maximum 50% of any development on C1 zoned lands can comprise of residential development, please refer to Chapter 2 Core Strategy for further details. A maximum 30% of any development on B1 zoned lands can comprise of residential development.~~ The Planning Authority will seek to achieve an appropriate balance and mix of uses on lands zoned C1 and B1, including an appropriate level of residential development to be determined on a case by case basis, please refer to Chapter 2 Core Strategy for further detail in this regard and Section 14 'Land Use Zoning Objectives' within this chapter.*

#### Alternate Modification

Without prejudice to the foregoing, if the Planning Authority do not omit the reference to a general maximum of 50% residential development, it is submitted that clarity should be provided, to confirm that the requirement that C1 zones should have a maximum of 50% residential development relates to any given C1 zone, rather than to individual planning applications. It is also considered appropriate that the wording of section 11.5.4. should clarify that the requirement in terms of residential development on C1 zoned lands is general in nature, having regard to the corresponding wording within the guidance under the C1 zoning objective (which is discussed in further detail below).

On this basis we would respectfully suggest that this portion of section 11.5.4 should be reworded state the following:

*'Generally, a maximum of 50% of development in any C1 zone can comprise of residential development, please refer to Chapter 2 Core Strategy for further details'*

Similar consideration should be given to amending the guidance relating to B1 zoned lands.

#### Land Use Zoning

Section 11.14.6 Land Use Zoning Categories gives revised guidance under the C1 zoning objective which is as follows:

## Zoning Category

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### C1 Mixed Use

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**Objective: To provide for and facilitate mixed residential and employment generating uses**

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#### Guidance

Lands identified for mixed use development are only appropriate in higher tier settlements. The objective on these lands is to provide opportunities for high density mixed use employment generating activities that also accommodate appropriate levels of residential development thereby facilitating the creation of functional 'live work' communities. These areas are generally located in proximity to high frequency public transport corridors. In order to achieve balanced development the percentage of residential development in C1 zones shall generally not exceed 50 % of the quantum of a development site.

The final sentence states *'In order to achieve balanced development the percentage of residential development in C1 zones shall generally not exceed 50% of the quantum of a development site.'*

#### Requested Modification

As set out above, it is respectfully submitted that a general maximum of 50% residential development on C1 zoned lands is overly prescriptive (notwithstanding that this guidance is 'general' in nature, therefore providing for exceptions).

As set out above, the appropriate mix of uses and quantum of residential development on C1 zoned lands will vary at different location in the county, based on existing land uses in the area, transport factors, and the surrounding pattern of development. Therefore, it is considered appropriate that the reference to a general maximum of 50% residential development be omitted, and replaced with wording to clarify that the Planning Authority will seek an appropriate balance and mix of uses on C1 zoned lands, to be assessed on a case by case basis with regard to the specific C1 zoned lands in question. This modification would require an amendment to the guidance under the C1 zoning objective as follows (deletions in red and stuck through, and suggested text in green):

*Lands identified for mixed use development are only appropriate in higher tier settlements. The objective on these lands is to provide opportunities for high density mixed use employment generating activities that also accommodate appropriate levels of residential development thereby facilitating the creation of functional 'live work' communities. These areas are generally located in proximity to high frequency public transport corridors. ~~In order to achieve balanced development the percentage of residential development in C1 zones shall generally not exceed 50 % of the quantum of a development site.~~ The Planning Authority will seek to achieve an appropriate balance and mix of uses on lands zoned C1, including an appropriate level of residential development to be determined on a case by case basis.*

### Alternate Modification

Without prejudice to the foregoing, in the event the Planning Authority wish to retain a reference to a general maximum of 50% residential development on C1 zoned lands, we suggest the following modification.

The phrase 'of a development site' is considered to relate to the overall development of a C1 zone. However, in order to avoid the misconstruing the phrase 'development site' as relating to a planning application site (rather to an overall parcel of C1 zoned lands), it is considered that an alternate modification could be provided. Were the requirement for 50% non-residential uses to be applied on the basis of an individual application site, it would significantly constrain the development of C1 zoned lands, as an individual parcel or application site within a C1 zone might comprise only a small portion of the overall zone, where it would not be appropriate to apply this requirement at such a scale.

Clarity should be provided here and for the same reasons set out above relating to Plot Ratio, we would respectfully suggest that this last sentence in the 'guidance' section relating to C1 zoning be amended to state the following:

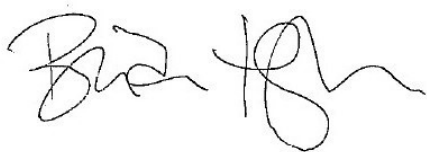
*'In order to achieve balanced development the percentage of residential development in any C1 zone shall generally not exceed 50%.'*

Furthermore, it is noted that the guidance on the percentage of residential development within C1 zones will be applied 'generally' (i.e. in some circumstances a different percentage of residential development could be applied, for example on infill sites where commercial, retail and employment uses have already been provided in earlier phases of the development of a C1 zone). To provide for additional clarity in this regard, it is respectfully requested that the following sentences be added to the end of the Guidance under the C1 zoning objective:

*"Proposals for residential development comprising more than 50% of any C1 zone shall be considered on their merits. In circumstances where commercial and employment uses have already been delivered to the satisfaction of the Planning Authority in any C1 zone, individual applications that includes a percentage of residential development in excess of 50% on the balance of the C1 zone lands will also be considered on their merits."*

I trust that this is to your satisfaction and that you will take the foregoing into consideration.

Yours Faithfully



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Submission prepared by

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