

20170217-17-CDP

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

Sent by email to:
planning@meathcoco.ie

17.02.17

Re: Pre-Draft Meath County Development Plan 2019-2025

Dear Sir/Madam,

An Taisce welcomes the review of the Meath County Development Plan (CDP) and would like to make the following comments which we request the Planning Authority (PA) take into consideration in the finalisation and adoption of the CDP, including the accompanying Strategic Environmental Assessment (SEA) and Article 6 Habitats Directive Assessment (HDA).

We would also request that the PA make An Taisce known of any further consultation periods regarding the making of this CDP and issue An Taisce with notification of any future proposed amendments to the Draft CDP and notification of the final adopted CDP.

Yours faithfully,

Doireann Ní Cheallaigh

Planning Officer
An Taisce – The National Trust for Ireland

1.0 Executive Summary

The new CDP will provide a key policy document of central importance for a critical period in Irish society and will form a contract between the PA and the local community embodying a promise to regulate land use in accordance with its policies and objectives¹.

1.1 General

- The objective for those preparing the new CDP should be conciseness, clarity and simplicity in use of language, and that planning terms be explained in an appending glossary. The excessive flexibility inherent in many CDPs is a key factor in the long delays experienced in the planning process. This flexibility is evidenced both vagueness and by 'let-out' clauses which causes interpretation problems for the developer, the Councillors, the public, and even the officials.
- Since the adoption of the previous CDP for the area a plethora of new long overdue environmental regulations have been brought into force which places strict new legal obligations on the PA. Regardless of the scale of the CDP, compliance with these new regulations cannot be ensured in the absence of undertaking a full Strategic Environmental Assessment (SEA) and Habitats Directive Assessment (HDA) in parallel with the preparation of the CDP. (Section 8.0 of submission)
- The CDP must be informed by a high level of transparency, democratic participation, community empowerment, and local decision-making and ownership.

1.2 Strategic Planning & Zoning

- In accordance with provisions of the Planning & Development (Amendment) Act (PDA) 2010 it is now a mandatory legal requirement that the CDP must 'be consistent with' with the relevant Regional Planning Guidelines and the National Spatial Strategy, National Planning Framework (NPF).
- The CDP must comply with the new methodical and evidence-based approach to land-use zoning and settlement planning included under the PDA 2010 which requires a demonstrated rational 'joined up' assessment of zoned land requirements based on such criteria as, inter alia, regional population targets, the sequential approach, flood risk assessment, infrastructure capacity, natural habitats and S.28 Guidance published by the DoECLG.
- The PA must only apply considerations of proper planning and sustainable development (i.e. sequential approach, flooding etc) in zoning, phasing, de-zoning or downzoning land and disregard all other considerations including private interests or potential commercial or rate generating revenue.
- The PA must issue the draft CDP and any proposed amendments to the draft CDP to the Regional Planning Authority (RPA) (and/or the National Transport

¹ See McCarthy J. In Attorney General (McGarry) v. Sligo County Council [1991]

Authority (NTA) to test compliance with the RPGs (and/or the GDA Transport Strategy) and the response from the RPA must be made available to the public.

- The PA must not include any new zoning objective, local objective or delist a protected structure without providing the public and all prescribed bodies with an opportunity for scrutiny and comment.

1.3 Fossil Fuels and Climate Change

- Climate change is the defining challenge of our time. The primary objective of the CDP must be to break the locality's dependence on oil, stopping the locality's contributions to global warming and preparing the locality with the resilience to thrive in a time of energy and climate uncertainty.
- The PA must prepare a strategy which would see the electrical generation needs of the locality primarily met by renewable sources by 2020, and entirely by 2030, including major use of local renewable energy sources, district heating and combined heat and power, and energy demand measures.

1.4 Sustainable Transport & Land Use Patterns

- A local transport plan must be prepared alongside the CDP setting out how the objectives of the national Smarter Travel policy will be achieved locally and translated into measurable action.
- The CDP must have the overall objective of significantly reducing transport demand by creating compact walkable settlement patterns and include detailed policies on walking and cycling. This must include permeability and way-finding studies to identify a safe network of existing/future walking and cycling routes which must be used as a chief criteria in selecting all land zoned for new development.
- The CDP must be carefully aligned with the regional transport strategies of the NTA, particularly with respect to rail infrastructure and bus services.
- Major new road objectives in the CDP must be discontinued. Investing further public monies on oil dependent transport infrastructure is wasteful.
- The sequential approach must be applied to the zoning of all land and the review of zoning in accordance with the PDA 2010 (including the phasing, de-zoning or down-zoning land).
- Land zoned for residential development must be located in close proximity and/or be well connected by public transport corridors (rail or bus) to existing and/or proposed services (e.g. schools, retail, community/health centres, sports/amenity facilities etc) and employment sites.
- Small-scale local industrial/commercial zones proximate to existing or proposed residential areas must be provided to deliver local employment opportunities rather than promoting large-scale industrial/warehouse parks.
- Mobility Management Plans must be made mandatory through the development management process for all planning applications (including one-off houses) requiring applicants to demonstrate how the objectives of the national Smarter Travel policy will be achieved through the development proposal.

- In accordance with the Sustainable Residential Development Guidelines in Urban Areas Guidelines the CDP must include policies to prohibit large-scale suburban type development proposals. Only development proposals commensurate with local physical infrastructure and social capital carrying capacity should be permitted.
- S.48 development contribution levies in lieu of off-street car parking in town centres should be dis-applied to counteract vacancy and revitalise traditional town centres
- Out-of-town commercial and/or retail development must be strictly prohibited. Where it has been permitted historically, car parking charges must be made mandatory to level the playing field and the unfair competitive advantage accruing to 'big box' out-of-town retailers from free car parking and publicly subsidised road infrastructure.
- The CDP must include policies to provide alternatives to unsustainable urban-generated dispersed one-off housing, including, for example, a serviced site policy (see Limerick County Council's Serviced Site Policy).
- A greenbelt policy should be implemented in peri-urban areas in the vicinity of the CDP boundary with strict restrictions on urban-generated one-off housing to prevent ribbon development and uncontrolled sprawl (See Cork County Development Plan 2009-2015).

1.5 Economic & Employment Development

- The CDP must include policies which support the development of a vibrant local manufacturing base that is based on the sustainable use of local indigenous resources and local markets which will make the locality more resilient in long run e.g. food processing, basic manufacturing etc.
- Ireland's principle resource is our abundant availability of fertile agricultural land. The CDP must include policies to promote the sustainable local exploitation of natural resources for local markets.
- The CDP should include a policy for the promotion of local farmers markets and identify locations where farmers markets can take place.
- The CDP must include policies for the prohibition of out-of-centre retail development. The PA must take an active role in site assembly for new retail development on brownfield and infill sites, including using CPO powers where necessary to provide for the sensitive revitalisation of town centres.
- The PA must require the introduction of car parking charges for out-of-centre retail development and introduce a corresponding S.48 waiver for development contribution levies in lieu of off-street car parking for new retail development in town centre locations.
- The CDP must include a specific policy that explicitly provides that the change of use of retail warehouse units to non-bulky goods comparison and/or convenience uses will not be permitted.
- The CDP should include a policy which restricts large floor-plate multiples, which are dependent on complex oil-dependent supply chains, in favour of smaller floor-plate local shops and businesses.

- The CDP must include a clear programme of implementation which links the delivery of key pieces of social, physical and environmental infrastructure with the sequential and phases development of zoned land. It must clearly and transparently inform the citizen and manages expectations about the future development of an area. The CDP should not include policies and objectives unless the PA is confident of their successful implementation.
- The CDP should include an Employment Land Survey to determine the quantum of employment land and where employment land should be located in the context of sustainable transport objectives and the existing and future carrying capacity of physical infrastructure.
- Small-scale local industrial/commercial zones proximate to existing or proposed residential areas must be provided to deliver local employment opportunities rather than promoting large-scale industrial/warehouse parks.

1.6 Water

- The CDP must include a suite of integrated policy measures to ensure that the PA's legal obligations under the Water Framework Directive and the operable River Basin Management Plan are achieved.
- The quantum of land zoned in the CDP must be carefully matched and phased with the existing and/or planned Population Equivalent (PE) capacity of the local waste-water treatment plan. Where there is no commitment in the Water Services Investment Programme (WSIP) to fund additional waste-water treatment capacity surplus zoned land should be de-zoned in accordance with the sequential approach.
- The CDP must include policies to provide alternatives to unsustainable urban-generated dispersed one-off housing, including, for example, a serviced site policy (see Limerick County Council's Serviced Site Policy).
- The CDP must de-zone or down-zone lands categorized in 'Flood Zone A' of 'Flood Zone B' applying the sequential approach. Where the zoning of recognised flood prone areas is retained a detailed Justification Test in accordance with the Flood Risk Assessment & Management Guidelines must be carried out.
- The use of Sustainable Urban Drainage Systems (SUDS) and rainwater harvesting must be made mandatory for all new development proposals.
- The CDP should seek to implement a Green Roofs policy through the development management process. It should be a mandatory requirement for all new developments to include an element of green roof technologies.

1.7 Natural Capital & Ecosystem Services

- In order to prevent potential legal action the CDP and development management decisions of the PA must rigidly adhere to its substantial legal obligations under EU law.
- Achieving adherence to the PA's legal obligations under the Habitats Directive and other environmental legislation cannot be achieved without the preparation in tandem with the CDP of a full SEA and HDA.

- The policy recommendations of the National Biodiversity Plan 2010 – 2015/ National Biodiversity Plan 2017-2021 should be fully incorporated into the CDP and a Local Biodiversity Action Plan prepared.

1.8 Cultural & Built Heritage

- The CDP should seek to designate more Architectural Conservation Areas (ACA's) and Special Planning Control Schemes.
- S.48 development levies for Protected Structures should be waived to encourage sensitive reuse and adaptation.
- Important views and prospects must be protected.
- The Architectural Heritage Protection Guidelines for Planning Authorities must be implemented in full.

1.9 Implementation & Monitoring

- A designated implementation officer should be appointed to oversee the implementation of the CDP and ensure joined up thinking between development management, forward planning, environment, service, infrastructure provision etc.

2.0 Strategic Planning and Zoning

It is noted in the Issues Paper prepared that *'ensuring sufficient, stable and sustained provision of housing that is affordable, in the right locations, meets people different needs and is of lasting quality is one of the greatest challenges facing the country at present'* and that *'Meath has a significant role in addressing the current national housing crisis by providing solutions to housing shortages'*. It is further stated that *'the County Development Plan will contain a new housing strategy which will set out to identify the housing needs arising in the County over the period of the plan. It will address issues such as future need and availability of zoned land for housing, provision of a suitable mix of unit types to cater for all housing need requirements in all urban centres'*.

Mid East Region has seen a population growth from 531,087 (2011) to 599,404 (2016) according to the CSO [population increase of 28,317].

In relation to County Meath, there has been a growth in population from 184,135 to 194,942. [Population increase of 10,807].

The table below indicates census data for Stamullen, Jullienstown and Mornington-Laytown-Bettystown (including suburbs and environs) all indicating continuous population growth.

Stamullen	
2002	779
2006	2,487
2011	4,696
2016 (Preliminary Results)	5,001

Julienstown	
2006	8,098
2011	9,606
2016 (Preliminary Results)	10,139

Mornington – Laytown – Bettystown (incl. Suburbs and Environs)	
2002	5,597
2006	8,978
2011	10,889

In relation to St. Mary's Parish, it was reported that the census data (2011) indicated that 10,769 lived in one-off properties and estates including Grange Rath and Deepforde.²

In total, the population of East Meath in 2011 (Stamullen, Juliendstown, Morningtown-Laytown and Bettystown and St. Mary's Parish) was 35,960.

The population has started to grow over the last 3 years with the 2016 census preliminary results showing further increases in these areas. It is estimated that the quantity of zoned land, existing planning permissions and vacant housing is enough to increase the population by approximately 16,000.

The location of residential zoning in East Meath, not connected to public transport corridors is having serious impacts and is exacerbating sprawl. Excessive zoning in East Meath and subsequent dramatic population has had a serious knock on impact on the provision of schools and facilities to serve the population.

The new County Development Plan needs to address the significant quantum of available zoned lands. The location of residential zoned lands needs to be informed by the Core Strategy and key elements of the Regional Planning Guidelines and align with the National Planning Framework (NPF).

A range of provisions of the PDA 2010 require that the land-use zoning and other provisions of all CDPs must **'be consistent with'** the National Spatial Strategy, the relevant Regional Planning Guidelines and S.28 Ministerial Guidelines issued under the Planning Acts 2000 - 2010. **Consistency is now a mandatory legal requirement**

² <http://www.independent.ie/regionals/droghedaindependent/news/huge-rise-in-east-meath-population-27166404.html>

and it would be unlawful for the PA to deviate from these higher level plans and policies.

Recommendation:

- **The CDP must comply with the new methodical and evidence-based approach to land-use zoning and settlement planning included under the PDA 2010 which requires a demonstrated rational assessment of zoned land requirements based on such criteria as, inter alia, regional population targets, the sequential approach, flood risk assessment, infrastructure capacity, natural habitats and S.28 Guidance published by the DoECLG.**

2.1 Land-Use Zoning

The zoning of land for appropriate and sustainable uses is at the heart of planning and if this departs from proper principles the whole system is in difficulty and this extends to the property and land market and the construction industry. Where land is zoned there is a presumption in principle that development will be permitted and to refuse could mean the PA being faced with claims for compensation by landowners.

The PA must recognise that its own interest is only effectually achieved through integration with its region and surrounding area.

The inappropriateness of zoning objectives in many instances becomes a reality at appeal to An Bord Pleanála. The Board routinely disregards zoning objectives which are not in accordance with the principles of proper planning and sustainable development and refuses planning permission. **This undermines confidence in the planning system and leads to misplaced investment decisions by private investors, significant costs, conflict with local communities and is ultimately counterproductive.**

Due to the legacy of significant over-zoning the implications of the PDA 2010 will most likely necessitate the de-zoning, down-zoning or phasing of significant amount of zoned land and a careful reprioritisation (phasing) of future new development towards efficient, compact and walkable serviced locations in accordance with the sequential approach and infrastructure capacity.

The principle of de-zoning and down-zoning of land has been established and the planning legislation is very clear from planning legislation that there is no legal or constitutional prohibition on altering or discontinuing the zoning of land³.

Recommendation:

- **Following an evidence-based assessment of the quantum of zoned land within the CDP area, where there is surplus supply an appropriate quantum of land must be de-zoned, down-zoned or phased in accordance with the provisions of the PDA 2010.**

³ See: Regional Authorities - Regional Planning Guidelines Implementation Annual Report 2011

- **The PA must only apply considerations of proper planning and sustainable development (i.e. sequential approach, flooding etc) in zoning, phasing, de-zoning or downzoning land and disregard all other considerations including private interests or potential commercial or rate generating revenue.**
- **Following any future precedential decision from An Bord Pleanála which overturns a PA decision, a review should be undertaken to examine the basis on which the decision was made, and a report presented to Councillors on required amendments to the CDP required. This is a key conclusion of the recently published DoECLG Planning Review Report.**

3.0 Fossil Fuel and Climate Change

Climate Change is influenced by a cross section of themes including energy use, agriculture, and the distribution of population and subsequently transportation.

Ireland has signed up to the 20:20:20 EU agreement whereby we have a legally binding pledge to reduce greenhouse gas emissions by 20% below 1990 levels and increase energy efficiency by 20% by 2020. The scale of change needed to meet Ireland's commitments is enormous. Ireland's national Greenhouse Gas (GHG) emissions reduction target equates to approximately 2.5% per year until 2020. Greenhouse gas emissions from the transport sector have risen 170% over 1990 levels primarily due to spatial sprawl.

Accordingly further infrastructure investment in roads to serve energy inefficient and emission generating private motorised vehicles is untenable. Further investment in Ireland in road infrastructure (outside of road infrastructure maintenance) and the shaping of our society and economy around oil based transport (i.e. dispersed settlement patterns, suburban sprawl, export growth) will inevitably undermine our position in emission reduction.

Ireland needs a coordinated effort to reduce emissions and embrace low carbon development. The PDA 2010 includes a new mandatory objective for development plans⁴ as follows:

"The promotion of sustainable settlement and transportation strategies in urban and rural areas including the promotion of measures to:

- reduce energy demand in response to the likelihood of increases in energy and other costs due to long-term decline in non-renewable resources,*

⁴ Section 10(2) of the 2000 Act as amended by section 7 of the Planning and Development (Amendment) Act 2010

- 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.”

Additionally, Section 15 of the Climate Action and Low Carbon Development Act 2015 requires that all Government Departments and public bodies shall in the exercise of their functions have regard to *‘the objective of mitigating greenhouse gas emissions and adapting to the effects of Climate Change in the State’*.

The PA has an obligation to respond now to the challenges of climate change through development which reduces the need for energy use, support sustainable modes of transport which will reduce the locality’s carbon footprint in order to minimise the locality’s greenhouse gas emissions and adapt to the effects of climate change, with particular reference to the areas of land use, energy, transport, water resources, flooding, waste management and biodiversity.

The CDP needs to contain clear policy and objectives to reduce GHG emissions and to promote renewable energy. There is a need to establish compact walkable settlement, served by public transport that would contribute to a reduction in transport emissions.

Carbon emissions in other sectors also need to be addressed and reduced. According to the SEAI, Residential Energy Roadmap out homes account for more than a quarter of Irish energy related carbon emissions. During the next decade, we must continue to push the envelope towards cutting edge building standards for new homes.

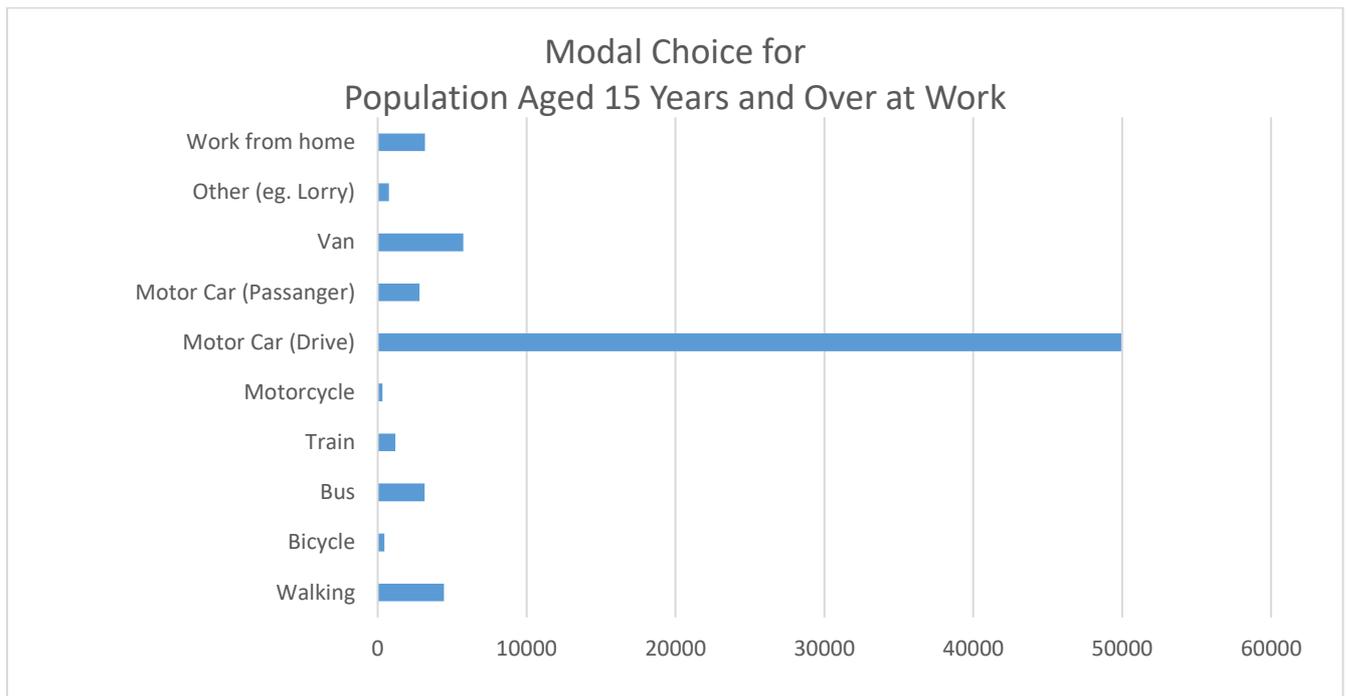
The CDP should use this as an opportunity to follow the example of countries across the world who have begun to reverse their dependency of fossil fuels through the development of Solar PV.

France, for example, requires all new buildings in commercial areas to be partially covered by either solar panels or green roofs. An Taisce recommend that a strong emphasis is placed on the development of renewable energy, with particular emphasis in the CDP on new commercial/warehouse/industrial development. Furthermore, it is recommended that the PA prepare and adopt a local Climate Change strategy in parallel with the preparation of the CDP.

4.0 Sustainable Land Use Pattern

4.1 2011 Census Figures

The graph below gives a clear indication of transportation trends in Meath. It is clear that the preferred method of travel for the population aged 15 years and over at work is the motor car (49,944).



(CSO Data: 2011)

In relation to our emissions from transport, the EPA released 'Greenhouse Gas Emission Projections to 2020'. Under transport, it was concluded that emissions from this sector under the 'with measures scenario' are projected to increase by 16% in the period of 2014-2020. Under 'With additional Measures' emissions are projected to increase by 10%.

In order for us to change this pattern of rising transport emissions, and improve the quality of life for citizens, it is imperative that the CDP addresses future population growth and encourages a shift away from dispersed settlement towards more consolidated compact urban forms and investment in public transport, walking and cycling in maintained and improved in order to offer communities a viable alternative to private cars.

The Government launched 'Smarter Travel – A Sustainable Transport Future' in February 2009. The document, which was the subject of extensive public consultation, includes five key goals – (1) to reduce overall travel demand, (ii) to maximise efficiency of the transport network, (iii) to reduce reliance on fossil fuels, (iv) to reduce transport emissions and (v) to improve accessibility to transport.

The targets included in the Smarter Travel policy to significantly increase sustainable modal choices and reverse car dependency are challenging but urgently required. The CDP must include specific policies, objectives and measures to translate national policy into tangible local action.

The PDA 2010 includes a new mandatory objective for development plans⁵ as follows:

"The promotion of sustainable settlement and transportation strategies in urban and rural areas including the promotion of measures to

- 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."

Circular PSSP-4-2010 to all planning authorities and has determined that the following national policy documents relate to proper planning and sustainable development under Section 9(6) of the Planning & Development Act 2000:

- Smarter Travel – A Sustainable Transport Future: A New Transport Policy for Ireland 2009 – 2012 (Department of Transport)

The requirements of this new provision will require a considerable shift in emphasis away from dispersed settlement patterns towards consolidation and compact urban forms. As a subsidiary to the county/city development plan, the CDP has a pivotal role in ensuring that spatial and transport planning are aligned to avoid unsustainable travel patterns and to ensure the objectives of Smarter Travel are achieved locally.

In the context of land use planning, the most effective means to achieve these objectives is to prevent inefficient and unsustainable car-based development sprawl i.e. planning for the best use of land to benefit from investment of public funds in physical infrastructure, including public transport infrastructure.

⁵ Section 10(2) of the 2000 Act as amended by section 7 of the Planning and Development (Amendment) Act 2010

Recommendation:

- **A local transport plan must be prepared alongside the CDP setting out how the objectives of the national Smarter Travel policy will be achieved locally and translated into measurable action.**
- **The CDP must have the overall objective of significantly reducing transport demand by creating compact walkable settlement patterns and include detailed policies on walking and cycling. This must include permeability and way-finding studies to identify a safe network of existing/future walking and cycling routes which must be used as a chief criteria in selecting all land zoned for new development.**
- **The CDP must be carefully aligned with the regional transport strategies of the National Transport Authority (NTA), particularly with respect to rail infrastructure and bus services.**
- **New road objectives in the CDP must be discontinued. Investing further public monies on oil dependent transport infrastructure is wasteful.**
- **The sequential approach must be applied to the zoning of all land and the review of zoning in accordance with the PDA 2010 (including the phasing, de-zoning or down-zoning land).**
- **Land zoned for residential development must be located in close proximity and/or be well connected by public transport corridors (rail or bus) to existing and/or proposed services (e.g. schools, retail, community/health centres, sports/amenity facilities etc) and employment sites.**
- **Small-scale local industrial/commercial zones proximate to existing or proposed residential areas must be provided to deliver local employment opportunities rather than promoting large-scale industrial/warehouse parks.**
- **Mobility Management Plans must be made mandatory through the development management process for all planning applications (including one-off houses) requiring applicants to demonstrate how the objectives of Smarter Travel will be achieved through the development proposal.**
- **In accordance with the Sustainable Residential Development Guidelines in Urban Areas Guidelines the CDP must include policies to prohibit large-scale suburban type development proposals. Only development proposals commensurate with local physical infrastructure and social capital carrying capacity should be permitted.**
- **S.48 development contribution levies in lieu of off-street car parking in town centres should be dis-applied to counteract vacancy and revitalise traditional town centres**
- **Out-of-town commercial and/or retail development must be strictly prohibited. Where it has been permitted historically, car parking charges must be made mandatory to level the playing field and the unfair competitive advantage accruing to 'big box' out-of-town**

retailers from free car parking and publicly subsidised road infrastructure.

- The CDP must include policies to provide alternatives to unsustainable urban-generated dispersed one-off housing, including, for example, a serviced site policy (see Limerick County Council's Serviced Site Policy).

4.2 Population Dispersal

The PA must ensure that proactive measures are included in the CDP to promote nucleation and protect rural areas from a proliferation of car-dependent dispersed urban-generated settlement.

We would refer the PA to the report prepared by the Environmental Protection Agency (EPA) – Sustainable Rural Development: Managing Housing in the Countryside 2010. The recommendations of this report should be incorporated directly into the CDP.

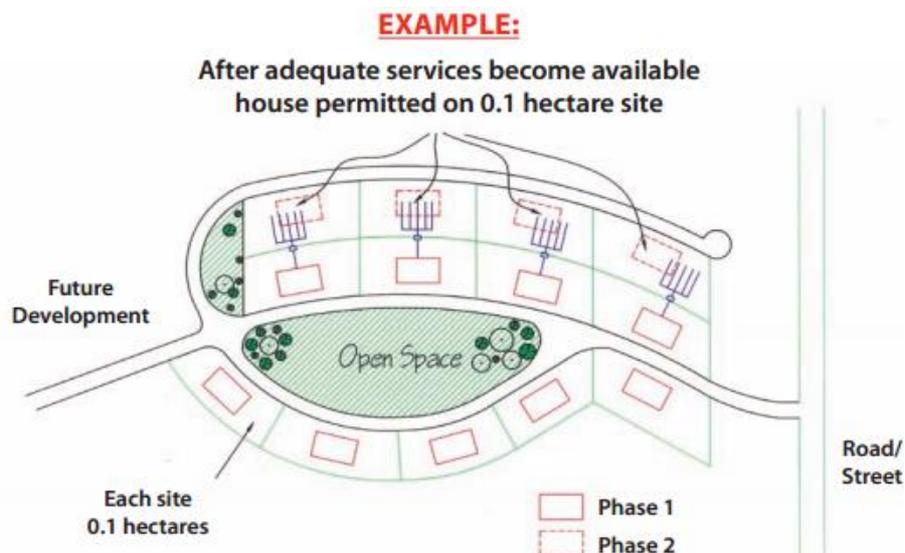


Figure 1 - The Planning Authority should implement a serviced sites initiative.

We would also direct the PA's attention to a Forfas Statement on Energy which states:

'Ireland has opted for a policy of land-use planning which has resulted in the sprawl of low-density housing developments. This approach, while socially popular, is not sustainable from an energy, environmental, climate change or quality-of-life perspective'

The most sustainable form of rural housing development is the village/small town cluster, which allows for the efficient delivery of services and infrastructure; enhances social capital, provides a compact walkable community; and the protection of the natural environment.

The CDP has a key role to play in providing a suitable housing choice and alternative to one off housing. It should be a specific objective of the CDP to deliver suitable locations for serviced sites with access to piped infrastructure for those wishing to build their own dwelling houses.

A greenbelt policy should be implemented in peri-urban areas in the vicinity of the CDP boundary with strict restrictions on urban generated one-off housing to prevent ribbon development and uncontrolled sprawl.

4.3 Walking & Cycling

The CDP needs to place an emphasis on slow modes of transport. The National Cycle Policy Framework includes practical measures to help achieve the key objectives of this policy. The framework takes a methodical approach to investment and has an unquestioned research base. Better catering for cyclists and pedestrians must follow the hierarchy of provision, which starts with cutting speed and traffic levels as follows:

1. Reduce traffic speed and enforce the law.
2. Reduce traffic volume, particularly HGVs.
3. Redesign poorly-configured junctions, and better manage traffic.
4. Increase road space for cyclists and pedestrians (with wider inside lanes for example)
5. Consider dedicating hard shoulders to cyclists.
6. Having considered and, where feasible, undertaken all of the above, are there roads or streets that would benefit from the installation of on-road cycle lanes? Are there alignments which can be considered for off road cycle lanes?

Recommendation:

The CDP must include permeability and way-finding studies to identify a safe network of existing/future walking and cycling routes which must be used as a chief criteria in selecting all land zoned for new development connecting with key services and amenities such as schools, shops, parks etc (See Green Infrastructure approach below)

5.0 Economic and Employment Development

There is a significant amount of economic zoned land in Co. Meath. The new CDP needs to address the location of current employment and trends, with an analysis of future demand.

A key factor for the future economic, social and environmental prosperity of the locality is the creation of an appropriate **critical mass** of population in the targeted settlement centres. The key locational criteria for new employment generating enterprises are urban centres with sufficient **agglomerations of scale** to support a range of vital support services and infrastructure (e.g. broadband, water services, social capital etc) for both the enterprise and individual employees

5.1 Rural Enterprise

An Taisce strongly supports local and rural enterprise which serves local population catchments. Small-scale enterprises and employment opportunities based on the sustainable use of indigenous local resources, particularly agriculture, bio-energy, agri-business and forestry are important in building local community resilience.

Recommendation:

- Ireland's principle resource is our abundant availability of fertile agricultural land. The CDP must include policies to promote the sustainable local exploitation of natural resources for local markets.
- The CDP should include a policy for the promotion of local farmers markets and identify locations where farmers markets can take place.

5.2 Retail Development

Retail policies and development for Co. Meath should align with recommendations of the Retail Strategy for the Greater Dublin Area, RPGs and the Retail Planning Guidelines for Planning Authorities, 2012.

Over the past decade there has been sustained pressure from multiple retail operators for out-of-town big box retailing and to circumvent the 'Sequential Approach'. The key driver of this trend is convenient access to publicly subsidised road networks, increased price competition and the ability to provide significant amounts of free surface car-parking.

The granting of out-of-town centres as resulted in the decimation of historic town centres and the loss of many long-established local retailers. This in turn has had a knock-on impact for built heritage, social capital and quality of life.

Recommendation:

- **The CDP must include policies for the prohibition of out-of-centre retail development. The PA must take an active role in site assembly for new retail development on brownfield and infill sites, including**

using CPO powers where necessary to provide for the sensitive revitalisation of town centres.

- The PA must require the introduction of car parking charges for out-of-centre retail development and introduce a corresponding S.48 waiver for development contribution levies in lieu of off-street car parking for new retail development in town centre locations.
- The CDP must include a specific policy that explicitly provides that the change of use of retail warehouse units to non-bulky goods comparison and/or convenience uses will not be permitted.
- The CDP should include a policy which restricts large floor-plate multiples, which are dependent on complex oil-dependent supply chains, in favour of smaller floor-plate local shops.

6.0 Water

6.1 Legal Obligations

The management of surface and ground in accordance with the provisions of the [EU Water Framework Directive](#) will be one of the most crucial overarching challenges for the PA in this CDP. Human activities have led to deterioration in water quality over many years. Ireland faces an immense challenge in achieving 'good' status in all water bodies by 2015. The achievement of our [Water Framework Directive](#) obligations will have linked benefits in the protection and enhancement of biodiversity, combating climate change, improving human health, protecting landscape and creating more sustainable settlement patterns. **Irish legislation now provides that local authorities can be sued for failing to meet water quality standards.**

A recent report by the [Environmental Protection Agency](#) published in December 2009 ([Water Quality in Ireland 2007 – 2008](#)) together with recent publication of the [statutory River Basin Management Plans](#) has clearly highlighted the immense scale of the challenge facing Ireland in meeting our binding commitments under the EU Water Framework Directive. This report documents that at least 50% of the water bodies in the country require restoration and that there has been a dramatically high deterioration in Irish water bodies in the last 20 years. The PDA 2010 includes specific mandatory objectives to ensure the **integration of water quality management requirements into the physical planning process.**

Recommendation:

- The CDP must include a suite of integrated policy measures to ensure that the PA's legal obligations under the Water Framework Directive and the operable River Basin Management Plan are achieved.

6.2 Municipal Waste Water Treatment

The CDP must be fully consistent with the PA's legal obligations under the [Waste Water Discharge \(Authorisation\) Regulations \(SI No. 684 of 2007\)](#).

Circular Letter PD7/09 issued by the Department of Environment, Heritage and Local Government sets out the 'Combined Approach' and requires that planning permission should not be granted to development proposals where there is insufficient cumulative capacity within the relevant Waste Water Treatment Plant. This further underlines the imperative for new development to be channelled to targeted development centres where the appropriate physical infrastructure is planned or present. Given the new era of resource scarcity (including financial resources), it is very unlikely that the waste-water treatment capacity will ever be present to service over-zoned land. As a consequence there is little point retaining a zoning objective for surplus zoned land. This land should be simply de-zoned as planning permission is unlikely ever to be achievable. Retaining a zoning objective in the face of landowner pressure will be counterproductive in the long run.

Recommendation:

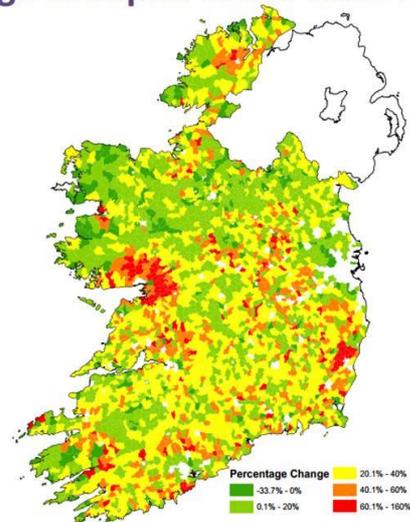
- **The quantum of land zoned in the CDP must be carefully matched and phased with the existing and/or planned Population Equivalent (PE) capacity of the local waste-water treatment plan. Where there is no commitment in the Water Services Investment Programme (WSIP) to fund additional waste-water treatment capacity, surplus zoned land should be de-zoned in accordance with the sequential approach.**

6.3 Private Waste Water Treatment

Despite the proliferation of dispersed settlement, much of the soil conditions throughout Ireland are unsuited to private on-site waste water disposal. The legacy of this inappropriate development will be a significant challenge for the achievement of our binding Water Framework Directive targets by 2015.

The PA has binding legal obligations under the European Communities Environmental Objectives (Groundwater) Regulations 2010 and European Communities Environmental Objectives (Surfacewater) Regulations 2009. The EPA have issued a new Code of Practice for private waste water treatment and PA is being forced to implement a new very stringent compliance regime with respect to all on-site private waste water treatment facilities. These new requirements coupled with other environmental regulations will mean that achieving planning permission for one-off dwellings will be increasingly more difficult. The CDP must deliver appropriate alternative locations for those wishing to live in self-build properties.

Change in Septic Tanks 1991-2006



© ESRI 2012

Recommendation:

- **The CDP must include policies to provide alternatives to unsustainable urban-generated dispersed one-off, including, for example, a serviced site policy (see Limerick County Council’s Serviced Site Policy).**

6.4 Surface Water

The Intergovernmental Panel for Climate Change (IPCC) has predicted that Ireland will experience more intense and prolonged rainfall events. This has been evidenced by the recent serious rainfall events and flooding throughout Ireland. The OPW is currently undertaking a Catchment Flood Risk Assessment & Management Plans (CFRAMS) for all major river systems in Ireland.

The Department of the Environment, Heritage & Local Government has also issued the Flood Risk Assessment and Management Guidelines under Section 28 of the Planning & Development Acts on the management of flood risks and the planning system. This allows for the de-zoning or down-zoning of lands where their development would comprise an unacceptable flood risk.

Conventional hard-engineered storm water management systems to drain surface run-off from asphalt, concrete and roof tiles are costly to implement and maintain. They also frequently fail causing urban flooding and a degradation of water quality. Sustainable Urban Drainage Systems are now becoming the norm throughout Ireland and are mandatory in the Greater Dublin Area. These systems aim to replicate greenfield run-off rates and include measures such as permeable paving, soft detention basins (Swales), rainwater harvesting and green/brown roofs.

Recommendation:

- **The CDP must de-zone or down-zone lands categorized in 'Flood Zone A' of 'Flood Zone B' applying the sequential approach. Where the zoning of recognised flood prone areas is retained a detailed Justification Test in accordance with the Flood Risk Assessment & Management Guidelines must be carried out.**
- **The use of Sustainable Urban Drainage Systems (SUDS) and rainwater harvesting must be made mandatory for all new development proposals.**

7.0 Cultural and Built Heritage

7.1 Designated Landscapes and Demesnes

It is recommended that a special zoning and policy provision be put in place for the recognition and protection of Meath's particularly rich heritage of demesnes and designated landscapes associated with castles and country houses.

The Department of Arts, Heritage, Rural and Regional Affairs and the Gaeltacht (ADHRRAG) has established a website on historic parks and gardens allowing the most significant locations in Co. Meath to be identified.

This includes Ardraccon, Ardmulchan, Beauparc, Bective, Bellinter, Carton (the area within Co. Meath), Drewstown, Dunsany, Gaultrim, Headford, Killeen, Somerton, Slane, Tobertynan where the main houses or castles are still standing. In other locations like the Arch Hall, Dangan, Loughcrew, Summerhill, Williamstown, where the main house has been demolished or has become ruinous but the demesne landscape remains of significant value as well as other associated structures and features. In other locations, demesnes have been compromised by institutional development such as Gormanstown Castle or urban encroachment such as Dunboyne.

In all of the locations, the combination of demesne walls, gates and lodges, stable and farm buildings, walled gardens, follies and designed landscape and main house whether surviving in whole or in part have an ensemble value. The demesnes also incorporate historic woodlands and perimeter tree belts of ecological value.

It is recommended that the most significant demesnes and designed landscape in the county be identified and planning policies applied to maintain and enhance their special character and significance in considering agricultural, recreational or other development.

8.0 Strategic Environmental Assessment

The preparation of a draft Development Plan requires Strategic Environmental Assessment under the SEA Directive by Meath County Council.

Article 5 of the SEA Directive requires the preparation of an Environmental Report *'in which the likely significant effects on the environment of implementing the plan or programme and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated.*

Article 6 provides for public consultation.

Article 8 on 'Decision Making' requires that *'the environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of any transboundary consultations entered into pursuant to Article 7 shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure'*.

Article 9(1)(b) on 'Information on the Decision' requires that *'a statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of consultations entered into pursuant to Article 7 have been taken into account in accordance with Article 8 and the reasons for choosing the plan or programme as adopted in the light of other reasonable alternative dealt with.*

Meath County Council has a legal obligation to ensure that the SEA process is robust and effective, to identify all likely significant effects on the environment under the range of consideration set out in the Annexes to the SEA Directive. To ensure integration of environmental considerations into the plan, a general policy or land use zoning should not be maintained where likely significant effects on the environment are identified.

This applies in particular to:

1. Land Use Strategy and Transport Generation

The "Core Strategy", land use zoning and transportation strategy set out in Draft plan needs to be integrated to avoid likely significant effects on the environment. This requires quantification and assessment of the location impact of all zoning on traffic generation and emissions of both residential and commercial development on climate and human beings. In particular any further non -public transport accessible accommodation of commuter housing or employment

locations directed by demand generated from the Greater Dublin Area would be negative in effect on the environment, and therefore could not be endorsed in the SEA Statement

2. Areas of Particular Sensitivity

The effects of range of considerations set out in the Annexes to the SEA Directive need to be identified on each land zoning location including climate, human beings, flora and fauna, landscape and cultural heritage. This applies particularly to areas of ecological landscape and cultural heritage such as a Boyne Valley, Tara, or Carton Demesne . Accordingly any existing zoning provision having a likely significant effect on the environment , e.g, adverse effect on the integrity of an historic demesne woodland should be subject to de zoning, and any new zoning ensure that no likely significant effect on the environment arises.

Meath County Council should be aware that any non-compliance with the SEA directive, including maintenance of policy provisions or zonings having likely significant on the environment would expose the Council to Judicial Review.

9.0 Conclusion

An Taisce welcomes further opportunities to engage in the review of the Meath County Development Plan.