



Oifig an
Rialaitheora Pleanála
Office of the
Planning Regulator

OPR Ref: DP-023-24

18th November 2024

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

Re: Proposed Variation No. 3 to the Meath County Development Plan 2021 - 2027

A chara,

Thank you for your authority's work in preparing the proposed Variation No. 3 (the proposed Variation) to the Meath County Development Plan 2021 - 2027 (the County Development Plan).

As your authority is aware, a key function of the Office of the Planning Regulator (the Office) is the assessment of statutory plans to ensure consistency with legislative and policy requirements relating to planning. The Office has evaluated and assessed the proposed Variation under the provisions of sections 31AM(1) and (2) of the Planning and Development Act 2000, as amended (the Act) and this submission has been prepared accordingly.

Recommendations issued by the Office relate to clear breaches of the relevant legislative provisions, of the national or regional policy framework and/or of the policy of Government, as set out in the Ministerial guidelines under section 28. As such, the planning authority is required to implement or address recommendations made by the Office in order to ensure consistency with the relevant policy and legislative provisions.

Observations take the form of a request for further information, justification on a particular matter, or clarification regarding particular provisions of a plan on issues that are required to ensure alignment with policy and legislative provisions. The planning authority is requested by the Office to action an observation.

A submission also can include advice on matters that the Office considers would contribute positively to the proper planning and sustainable development of the area. The planning Authority is requested by the Office to give full consideration to the advice contained in a submission.

On adoption of the proposed Variation, the Office will consider whether the proposed Variation has been made in a manner consistent with the recommendations of the Office and whether the plan sets out an overall strategy for the proper planning and development of the area concerned.

Overview

The proposed Variation has three parts referenced as proposed Amendments No. 1, No. 2 and No. 3. The proposed Amendment No. 1 intends to update the County Development Plan to take account of the Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities (2024) (the Compact Settlement Guidelines). The proposed Amendment No. 2 proposes new text and wording of objectives relates to Age Friendly Housing arising from section 6.4 Age Friendly Communities of the National Planning Framework and other policy documents issued by Department of Housing, Local Government and Heritage and the Department of Health. The proposed Amendment No. 3 introduces new percentage ranges of residential uses permissible in Town Centre and mixed use zoning.

The Office welcomes the transposing of national and statutory planning policy into the County Development Plan.

However, the Office does consider that a stronger policy framework is required in respect of the both the increased height at Navan train station, and the exemptions associated with the percentage ranges of residential uses within the B1 Commercial/Town or Village Centre zoning objective.

The Office also raises concerns regarding the proposed changes to the C1 Mixed Use Land Use zonings where such lands are located in peripheral and non-sequential locations.

It is within this context the submission below sets out two (2) recommendations under the following two themes:

Key theme	Recommendation	Observation
Consistency with planning policy	Recommendation 1	-
Land use zoning categories– percentage range for quantum of residential uses permitted on Town Centre/Mixed Use zoning	Recommendation 2	-

1. Consistency with planning policy

1.1 Navan rail station

The proposed Amendment No. 1 of the proposed Variation proposes to add the ‘proposed rail station Navan’ to the list of locations suitable for increased building height in section 11.5.9 and Objective DM OBJ 25 of the County Development Plan. Navan is already identified in the County Development Plan as a suitable location for increased building height.

The Office notes that the Navan railway project is identified in the National Transport Authority’s (NTA) Greater Dublin Area Transportation Strategy 2022-2042, and accepts that there is a rationale for increased density at this location once it has been confirmed that the Navan station will remain in its current location. In this respect, the Planning Authority should consult with the NTA to confirm that this is the case.

The proposed Variation also provides no design policy context for the consideration of increase height at this location. While this matter would be more appropriately addressed holistically through the preparation of a building height strategy as part of the review of the County Development Plan, in the interim the Planning Authority should provide some clear design criteria against which any planning application for proposed development can be assessed in accordance with Policy and Objective 4.2 of the Compact Settlements

Guidelines¹. Such design criteria and/or principles might usefully focus on the key principles for ‘responsive built form’ set out in section 4.4 (v) of these Guidelines.

Recommendation 1 – Increased Heights at Navan Station

Having regard to the creation of attractive, liveable, well designed urban spaces, and the integration of land use and transport policy, and in particular to:

- NPO 4 of the National Planning Framework for high quality urban places;
- Policy and Objective 4.2 of the Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities (2024) which requires the key indicators of quality urban design and placemaking set out in section 4.4 are applied within statutory development;
- RPO 8.1 of the Regional Spatial and Economic Strategy (RSES) requiring that the integration of transportation and land use planning;
- The Greater Dublin Area Transport Strategy 2022-2042 (GDA Transport Strategy) and RPO 8.4 of the RSES requiring that land use plans demonstrate a consistency with the GDA Transport Strategy; and
- SPPR 1 of the Urban Development and Building Heights, Guidelines for Planning Authorities (2018) to support increase building height in locations with good public transport accessibility,

The Planning Authority is required to:

- (i) clarify that the Navan station will remain in its current location. The Planning Authority should consult with the National Transport Authority in relation to this matter;
- (ii) provide a design context and/ or principles for the provision of increased building height at the proposed location.

¹ Published after the adoption of the County Development Plan

2. Land use zoning categories – percentage range for quantum of residential uses permitted on Town Centre/Mixed Use zoning

2.1 Residential quantum on town centre and mixed use lands

The proposed Amendment No. 3 increases the residential percentages permissible on the town centre and mixed use zonings (i.e. B1 Commercial / Town of Village Centre and C1 Mixed Use). It is proposed to increase the residential quantum under the B1 land use zoning from 'not exceed 30%' to 'within the range of 30-50%' and for the C1 land use zoning from 'not exceed 50%' to 'within the range of 50-70%'. The proposed Variation also includes provision for exemptions from these new residential ranges, on a case by case basis 'where a clear evidence base has been demonstrated'.

In relation to the B1 zoned lands which are generally centrally located with settlements, the provision of residential occupancy is welcomed as it promotes compact growth, activity in urban centres and sustainable mobility.

It is important, however, that an appropriate balance is struck between providing new homes, protecting the vibrancy and vitality of the town and village centres, providing for essential retail and services to serve the communities.

The Office is concerned, therefore, that there is a lack of detail in respect of exceptions. In this respect, the proposed Variation should clearly set out the basis or criteria for determining where and how 'a clear evidence base has been demonstrated'. This would provide clarity for the public and prospective applicants and would provide a robust policy framework to support decision making at the development management stage.

Any such exemptions should be determined having regard to the Development Plans, Guidelines for Planning Authorities (2022), National Policy and Regional Objectives for the regeneration and renewal of town centres.

In relation to the C1 zonings, the Office notes that a number of these zoning objectives are located in peripheral and non-sequential locations, often leapfrogging land identified as A2 zoned land not available for development until post 2027, for example in Enfield and Navan.

Furthermore, no evidence basis has been provided to support the increase in the residential quantum to 50-70%, and no criteria have been provided in respect of the exemption to full exceed this quantum.

The Office therefore considers that the changes to the C1 zoning objective are more appropriately considered as part of the review of the County Development Plan which will commence in 2025.

Recommendation 2 – Residential uses on town centre and mixed use lands

Having regard to the provision of new homes at locations that can support compact and sustainable development, and to urban regeneration and the need to address high levels of vacancy while protecting the vibrancy and vitality of town centres, and in particular to:

- NPO 6, NPO 11, NPO 35 of the National Planning Framework;
- RPO 6.12 of the Regional Spatial and Economic Strategy to support placemaking of town centres;
- the settlement and housing strategy vision set out section 3.2, chapter 3 of the Meath County Development Plan 2021 - 2027 (the County Development Plan);
- Ed Pol 2 of the County Development Plan to support and facilitate the economic development of the County in accordance with the Economic and Development Strategy for County Meath 2014-2022 or its replacement. The strategy seeks to ensure that towns and villages remain attractive to investment; and
- the Development Plans, Guidelines for Planning Authorities (2022),

The Planning Authority is required to:

- (i) clarify and define the exceptions associated with the percentage range of residential uses permitted within B1 Commercial/Town or Village Centre; and
- (ii) make the proposed Variation without the proposed amendments to the C1 Mixed use lands.

3. Other Matters

In the interest of clarity, the Planning Authority is requested to note the following:

- the density ranges set out in Compact Settlements Guidelines (such as those in section 3.3.2) are identified as net. Ensure that the density ranges as per the Guidelines included in Objective DM OBJ 14 are referenced as net.

- ensure footnote 2 (page 14 of the proposed Variation document) relating to accessible suburban/urban extension is appropriately referenced (where relevant) throughout the text inserted into Objective DM OBJ 14.
- clarify the proposed deletions and new wording proposed in Section 3.8.8 Housing for Older People.

Summary

The Office requests that your authority addresses the recommendations, and notes outlined above. As you are aware, the report of the Chief Executive of your authority prepared for the elected members under section 13 of the Act must summarise these recommendations and the manner in which they will be addressed.

At the end of the process, your authority is required to notify this Office **within five working days** of the decision of the Planning Authority in relation to the proposed Variation. Where your authority decides not to comply with the recommendations of the Office, or otherwise makes the plan in such a manner as to be inconsistent with the recommendations made by this Office, then the Chief Executive shall inform the Office and give reasons for this decision.

Please feel free to contact the staff of the Office in the context of your authority's responses to the above, which we would be happy to facilitate. Contact can be initiated through plans@opr.ie.

Is mise le meas,



Anne Marie O'Connor

Deputy Regulator and Director of Plans Evaluations