

Our Reference: FPL/184/02716

Your Reference:

28 June 2021

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The Chief Executive
Meath County Council

My Client Protect East Meath Limited

Re: Material amendments to the draft Meath County Development Plan

Closing date: 29 June 2021

A Chara

I act for Protect East Meath Limited a non-profit environmental protection organisation whose company number [REDACTED] and whose registered address is at [REDACTED]. My client's aim is to ensure that there are strong environmental protections in relation to development in or affecting East Meath.

My client has serious concerns that the draft County Development Plan, as proposed to be materially amended, will be incompatible with the Regional Spatial and Economic Strategy for the East and Midlands Regional Assembly 2019 to 2031 (the **RSES**) in relation to Drogheda, specifically the Southern Environs of Drogheda. As outlined in the attached expert report, the plan, as proposed with amendments, will release an excessive quantity of residentially zoned land in the Southern Environs of Drogheda which is far in excess of what is required by the Core Strategy leading to unplanned, unsustainable and haphazard development in the Southern Environs of Drogheda.

The draft (as proposed to be materially amended) does not set out a rationale for the quantum of zoned land to be released relative to the projected population increase and uses an artificially low household occupancy rate to inflate the number of housing units required to achieve the target population increase. No rational or objective basis for this approach can be identified in the draft and/or the proposed material amendments.

The Southern Environs of Drogheda appears to be unique in Meath as the only settlement for which appropriate transitional measures have not been deployed as required by the RSES. The fact that a Joint Urban Area Plan (**UAP**) for Drogheda is envisaged (although the draft plan has no real commitment as to

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when this plan will be adopted) is not a reason to produce a draft plan that is inconsistent with the RSES. In fact, doing so is likely to fatally undermine the UAP.

The material amendments therefore fail to ensure that the County Development Plan will, at the very least, be consistent with RPO 4.1 and RPO 4.11 of the RSES. Should the Planning Authority adopt the draft plan in this format it will therefore be in breach of Section 27(1) of the Planning and Development Act 2000 (the **2000 Act**) which requires planning authorities to ensure, when making a development plan or a local area plan, that the plan is consistent with any regional spatial and economic strategy in force for its area. It also seems clear that there will also be breaches of Sections 10(1A), 10(2A), and 11(1A).

It should also be pointed out that the Strategic Environmental Assessment (**SEA**) of the draft County Development Plan is premised on it being consistent with the RSES. Therefore, the adoption of a County Development Plan which is inconsistent with the RSES is, in addition to the breaches of the 2000 Act identified above, would also be in breach of the SEA Directive¹.

Overall, the material amendments have failed to ensure consistency with the RSES. According to my client's analysis, this will lead to unplanned, unsustainable, and haphazard development of the Southern Environs of Drogheda. This will have serious and irreversible consequences for Drogheda.

As identified in the attached expert report, there is no need to abandon the Phase II zoning qualification that is currently in place, given that there is more than adequate Phase I land available in the short to medium term while the UAP is being prepared. My client therefore urges the Planning Authority to maintain the present Phase I and Phase II qualifications to the residential zoning until the UAP is adopted.

If the Planning Authority does not ensure consistency with the RSES, my client will bring proceedings compelling the Planning Authority to meet its statutory obligations under Section 27 of the 2000 Act and the SEA Directive; it will also apply for interim measures to suspend the adoption on the County Development Plan insofar as it relates to the Southern Environs of Drogheda.

Please acknowledge receipt of this submission and confirm that it will be taken into account.

Yours faithfully



FP LOGUE

Encl: Report from Marston planning Consultancy dated 28 June 2021

¹Directive 2001/42/EC