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Senior Executive Officer
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Meath County Council
Buvinda House, Navan
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Our Ref: 03150/LO/2606/JK

26-Jun-2021

Dear Sir

SUBMISSION TO DRAFT MEATH COUNTY DEVELOPMENT PLAN 2021-2027 RELATING TO LANDS AT BRACETOWN AND GUNNOCKS, DUNBOYNE, COUNTY MEATH

Closing Date: 29-Jun-2021

1 INTRODUCTION

1.1 Trafficwise Ltd. is a firm of consulting engineers specialising in Traffic and Transportation Planning and Geometric Roads Design. We act for **Hickwell Ltd., Hickcastle Ltd., (HLHL) and Hub Management Company Ltd., Bracetown, Clonee, County Meath**, in this matter. This document is an integral part of a parent submission prepared by Declan Brassil & Company and should be read in conjunction with it and the plans and figures provided therein. This part of the submission examines only roads and traffic matters.

1.2 In preparing this submission we have inspected the following documents together with the plans and particulars of relevant local planning permissions and current planning applications:

- Meath County Development Plan 2013-2019
- Dunboyne/Clonee/Pace Local Area Plan 2009-2015
- Draft Meath County Development Plan 2020-2026
- Meath County Council 'Transportation Study at Dunboyne & Environs' dated October 2018
- Master Plan for Lands Between Portan Clonee and Bracetown, Co. Meath (Project Runways Expansion) dated June 2018
- Planning Reg. Ref. RA150605 Runway Information Services Limited
- Planning Reg Ref. RA180671 Runway Information Services Limited
- Planning Reg Ref. RA191593 Enginenode Limited

1.3 Grounds of Submission

1.3.1 The stated objective of CER OBJ 3 is *“To facilitate the development of lands between Portan Clonee and Bracetown for E2 ‘General Industry & Employment’ and E3 ‘Warehousing & Distribution’ as provided for in Vol. I of the County Development Plan”*.

1.3.2 This objective of facilitating the development of the zoned lands between Portan, Clonee and Bracetown can be achieved, and indeed is already being achieved, without the need to traverse the HLHL lands with the proposed roadway. Indeed, using these very same zoned lands for the purpose of providing a superfluous new section of road will serve to sterilise a large area of these lands so as to prevent their development, and so act contrary to the zoning objectives of the Draft Meath County Development Plan 2020-2026.

2 DETAILED GROUNDS OF SUBMISSION

2.1 Current Development Plan

2.1.1 The Meath County Development Plan 2013-2019 Figure 1.2 *‘Dunboyne Development Plan Map’* shows an indicative road objective routed through the lands Zoned E2/E3 between Portan and Bracetown. The road follows an indicative alignment between M3 Junction 4 at Clonee and ‘The Hub’ Logistics Park at Bracetown. This road objective is provided for in the Dunboyne/Clonee/Pace Local Area Plan 2009-2015 (LAP) under CER OBJ 3.

2.1.2 The purpose of the current road objective is to provide access to and thereby facilitate the development of lands between Portan Clonee and Bracetown for E2/E3 purposes solely for the development of major employment proposals, primarily FDI that require a significant site area.

2.1.3 The road objective serves no strategic transport function other than to provide access to zoned lands and this is evidenced in the Meath County Council *‘Transportation Study at Dunboyne & Environs’* dated October 2018.

2.1.4 The Transportation Study has regard to the LAP E2/E3 Zoning and to CER OBJ 3. CER OBJ 3 is not however considered in that study as part of any recommended ‘Road Transport Interventions’ nor is its contribution to network performance considered in the detailed modelling assessment of the operation of roads infrastructure in the LAP area. The Transportation

Study is consistent with the CER OBJ 3 road providing access to zoned lands with traffic arising from these lands ultimately accessing the R147.

- 2.1.5 The Transportation Study characterises the zoned lands between Bracetown and Clonee as “A low employment, FDI focused land bank”. The Transportation Study assumes that the R147 (former N3 National Primary Road) will continue to function as the primary distributor road serving the Dunboyne/Clonee/Pace Local Plan Area. The Transportation Study puts forward significant infrastructure recommendations to enhance this particular function of R147 within the context of the LAP.

2.2 Planning and Master Plan

- 2.2.1 Under Planning Reg. RA150605 permission was granted to Runway Information Services Limited (RISL) by decision dated 23-Jul-2015 for a large Data Centre (Facebook) located between Local Road L5028 ‘Portan Road’ to the west and the county boundary with Fingal to the east. A further permission under Planning Reg. RA180671 was granted to RISL by decision dated 27-Jul-2018. The latter permission comprises an extension of the former data centre development to include lands to the west of Portan Road. Each of the developments is accessed directly from the Portan Road.
- 2.2.2 Under the plans and particulars of Planning Reg. RA180671 Chapter 13 of the accompanying EIAR considers CER OBJ 3 and disregards its provision on the following grounds. “Given the Proposed Development does not require the delivery of the roads objective, the road has not been included within the development proposals.” This confirms that the expanded data centre development on lands between Portan and Bracetown does not require access from the road identified under CER OBJ 3.
- 2.2.3 The approved ‘Master Plan for Lands Between Portan Clonee and Bracetown, Co. Meath (Project Runways Expansion)’ dated June 2018 covers the Draft Development Plan MP2 lands and shows the road under CER OBJ 3 rerouted. The rerouted road is shown to connect to L5028 Portan Road approximately 1.4 km north of the original connection point at the R156 Roundabout as is identified in the LAP. The rerouted road follows the northern perimeter of MP2 zoned lands and connects directly into the private roads serving ‘The Hub’ Logistics Park.

2.2.4 The Master Plan includes indicative future access to the remainder of MP2 lands located between the boundary of the RISL development site (RA180671) and Bracetown Business Park and also shows further direct access to the MP2 lands provided from R147.

2.2.5 The purpose of the road under the current CER OBJ 3 is to provide access to the zoned lands between Bracetown and Clonee. The zoned lands are characterised in the Transportation Study at Dunboyne & Environs as 'A low employment, FDI focused land bank'. 'The Hub' Logistics Park already enjoys direct access from Local Road L1010 Kilbride Road that connects to R147 at a ghost island priority junction approximately 360 m south of the logistics park access. The connection of the CER OBJ 3 road from L5028 Portan Road was never identified in the determination of any previous planning applications as being required or necessary to provide access to 'The Hub' or other of the zoned lands at Bracetown within the ownership of HLHL. This remains the case.

2.3 Proposed Dunboyne/Clonee/Pace Amendment No. 5

2.3.1 The Draft Meath County Development Plan 2020-2026 includes for E2/E3 zoning between Bracetown and Piercetown and these lands are identified in the draft plan as MP3. The draft plan also promotes an objective to reroute the CER OBJ 3 road to be consistent with the '*Master Plan for Lands Between Portan Clonee and Bracetown, Co. Meath (Project Runways Expansion)*'.

2.3.2 In addition to the rerouted CER OBJ 3 road, the draft plan shows an additional disjointed road connection from the MP2 lands to the MP3 lands. The additional road appears to commence in 'The Hub' Logistics Park and follows an alignment through warehouse Unit A03 in 'The Hub' Logistics Park, from where it crosses L1010 Kilbride Road and terminates at two undefined points in the MP3 lands. This road proposal is a nonsense

2.3.3 This submission relates to Proposed Dunboyne/Clonee/Pace Amendment No. 5. The proposed amendment amends the Land Use Zoning map (Sheet 13(a)) "*to correctly show the indicative road routes through MP2 and MP3*".

2.3.4 Under the proposed amendment the corrected indicative road alignment is no longer along the internal roads of 'The Hub' and instead has been moved northward. The revised alignment follows along the north-east boundary of and through the MP2 lands in the ownership of HLHL.

- 2.3.5 We can find no evidence of an appropriate integrated land use and transportation study to justify the proposal to connect the MP3 and MP2 lands through 'The Hub' Logistics Park.
- 2.3.6 Without the link through the HLHL lands and without the crossing of the L1010 Kilbride Road, the MP2 lands to the south and the MP3 lands to the north of Bracetown would both have satisfactory access to the R147 which serves as the primary distributor road infrastructure in the area and is consistent with the Transportation Study at Dunboyne & Environs.
- 2.3.7 The zoned lands at Bracetown that include 'The Hub' and Bracetown Business Park are similarly provided with appropriate access to the R147 via L1010 Kilbride Road.
- 2.3.8 It follows that the principal function of CER OBJ 3 to provide access to zoned lands is achieved without the need to traverse the HLHL lands.
- 2.3.9 There is no evidence to justify the connection of L5028 Portan Road, to L1010 Kilbride Road and the R147 roundabout at Pace. Such a connection would serve to provide a disjointed route paralleling the R147.
- 2.3.10 Given the emphasis placed on investment and enhancement of the distributor function of the R147 corridor as set out in the Transportation Study at Dunboyne & Environs the duplication of this infrastructure is irrational. There is no necessity to duplicate the distributor function of the R147 by connecting the MP2 and MP3 lands which are identified as having 'low employment' density and it follows that they have correspondingly low traffic demand.
- 2.3.11 Providing a parallel route to the R147 through lands with low traffic generation has the potential to attract undesirable rat running traffic and has the potential to give rise to the disbenefits associated with anti-social behaviour and long-term parking.
- 2.3.12 The R147 is the primary distributor road serving the MP2 and MP3 lands and the modest traffic arisings should reasonably and appropriately be directed to the R147 corridor as envisaged in the Transportation Study at Dunboyne & Environs.

3 CONCLUSION

- 3.1 The objective of facilitating the development of the zoned lands between Portan, Clonee and Bracetown can be achieved, and indeed is already being achieved, without the need to traverse the HLHL lands with the proposed roadway. Indeed, using these very same zoned lands for the purpose of providing a superfluous new section of road will serve to sterilise a large area of these lands so as to prevent their development, and so act contrary to the zoning objectives of the Draft Meath County Development Plan 2020-2026.
- 3.2 In so far as the draft plan promotes the objective of re-routing the CER OBJ 3 road to be consistent with the *'Master Plan for Lands Between Portan Clonee and Bracetown, Co. Meath (Project Runways Expansion)'*, we submit that since the HLHL lands are already suitably accessed it would be logical to terminate the proposed route at the earliest point possible without trespassing on the HLHL lands.
- 3.3 Given the absence of any objective justification for the proposed roadway through the HLHL lands and given the very serious negative impact on the development potential, use and value of those lands the proposed Draft Development Plan objective of achieving a roadway through these lands is irrational.
- 3.4 We respectfully invite Meath County Council to agree that the current proposal that would duplicate the function of the R147 by connecting the MP2 and MP3 fails in providing a balanced approach to the forward planning of transportation demands, the provision of access to zoned lands and the optimum use of zoned lands. Accordingly, we invite Meath County Council to amend the current proposal to exclude the section of the route that is a through route of the Hickwell Ltd. Hickcastle Ltd. and Hub Management Company lands.

Yours sincerely



Julian Keenan
for **Traffic**wise Ltd.

