

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

Tuesday, 29th June 2021
[via Consultation Portal]

Re: Draft Meath County Development Plan 2021-2027 – Material Amendments Phase

Dear Sir/Madam,

1.0 INTRODUCTION/EXECUTIVE SUMMARY

Knockglade Limited¹ has retained Tom Phillips + Associates, Town Planning Consultants², to make this submission to the Material Amendments Phase of the Draft Meath County Development Plan 2021 – 2027. Our client is the owner of lands at Killegland, Ashbourne in Co. Meath (Fig 2.1 below).

Our client purchased the lands in late 2020, with the intent of retaining the land and planning for its long-term strategic development in conjunction with Meath County Council (MCC). Our client is very interested in working in tandem with the Council to ensure that the future long term growth potential of Ashbourne is secured both in terms of housing and employment needs, including the provision of services and the required amenities such as open space and parkland.

The land was identified as unzoned land in the Draft Meath County Development Plan 2021-2027 which was on public exhibition until 6th March 2020. (see Figure 1.1 below). It is noted that during the public exhibition phase of the Draft Development Plan a number of submissions were received seeking that 33.4ha of our client's land be zoned to provide for a freely accessible Public Park.

¹ RBK House, Irishtown, Athlone, Co. Westmeath

² Tom Phillips + Associates, 80 Harcourt Street, Dublin 2

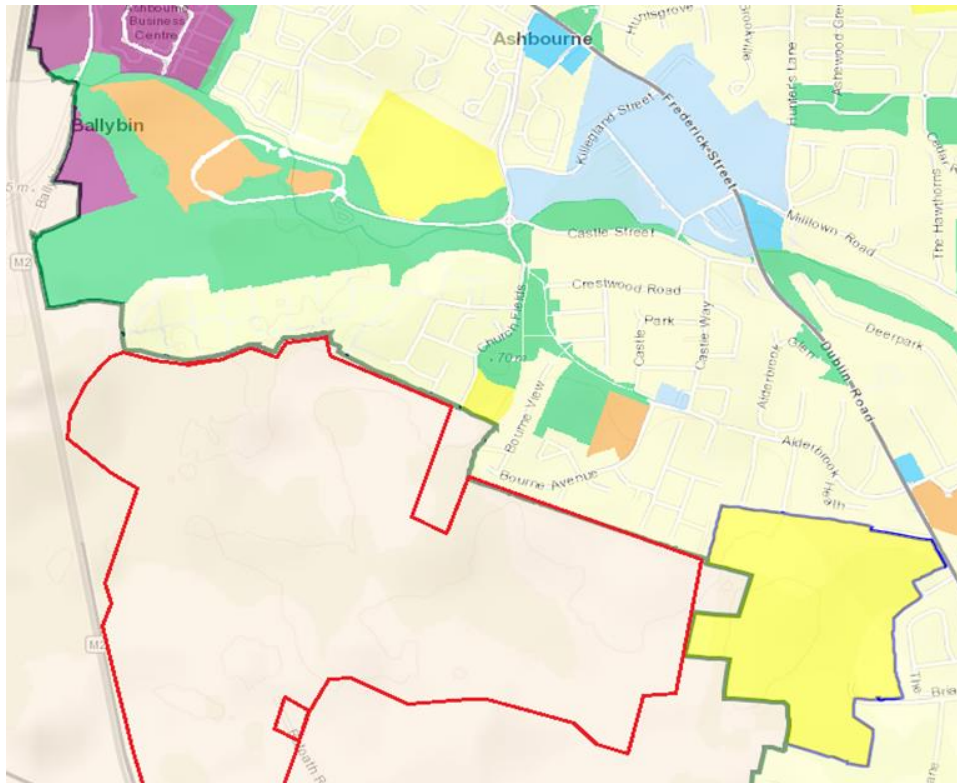


Figure 1.1: Draft Development Plan Zoning Map 2020, showing site (red line), edited by TPA.

Subsequent to the Public Exhibition Phase, MCC Chief Executive's (CE) Report recommended³ inter alia, that ASH OBJ 21 of the Draft Development Plan be amended to:

"To facilitate the provision of a public park on proximate lands to the southwest of the town centre with appropriate lands to be zoned as part of the Ashbourne Local Area Plan."

It is noted that the recommendation neither confirms the exact location, layout, or quantum of land to be zoned for these purposes. Furthermore, the CE's Report did not recommend that our client's land be zoned at this time.

The Chief Executive in response to Motion 111 of the Special Planning Meetings stated the following:

- that the 'FAC Report does not reflect the open space provision throughout Ashbourne and has been tailored to (sic) provide a particular viewpoint'.
- it is the 'strongly held view' that the formal designation of any future public park should not occur as part of this process.
- It should be considered within the proposed Local Area Plan for Ashbourne', a priority after the adoption of the Meath CDP 2021-2017.
- The quantum of land proposed is 'far in excess' of that required 'and that for which funding would be available'.

Notwithstanding this, at its Special Planning Meeting on 11th January, Council resolved to support a motion to zone 33 hectares of land to F1 Open Space. Our client owns the majority of this land with [REDACTED] owning approximately 2.5 hectares. The land is now identified in the Material Amendments to the Draft Development Plan (MA07) as being partially zoned as F1 Open Space (Refer Figure 1.2).

³ In response to submission MH-C5-411

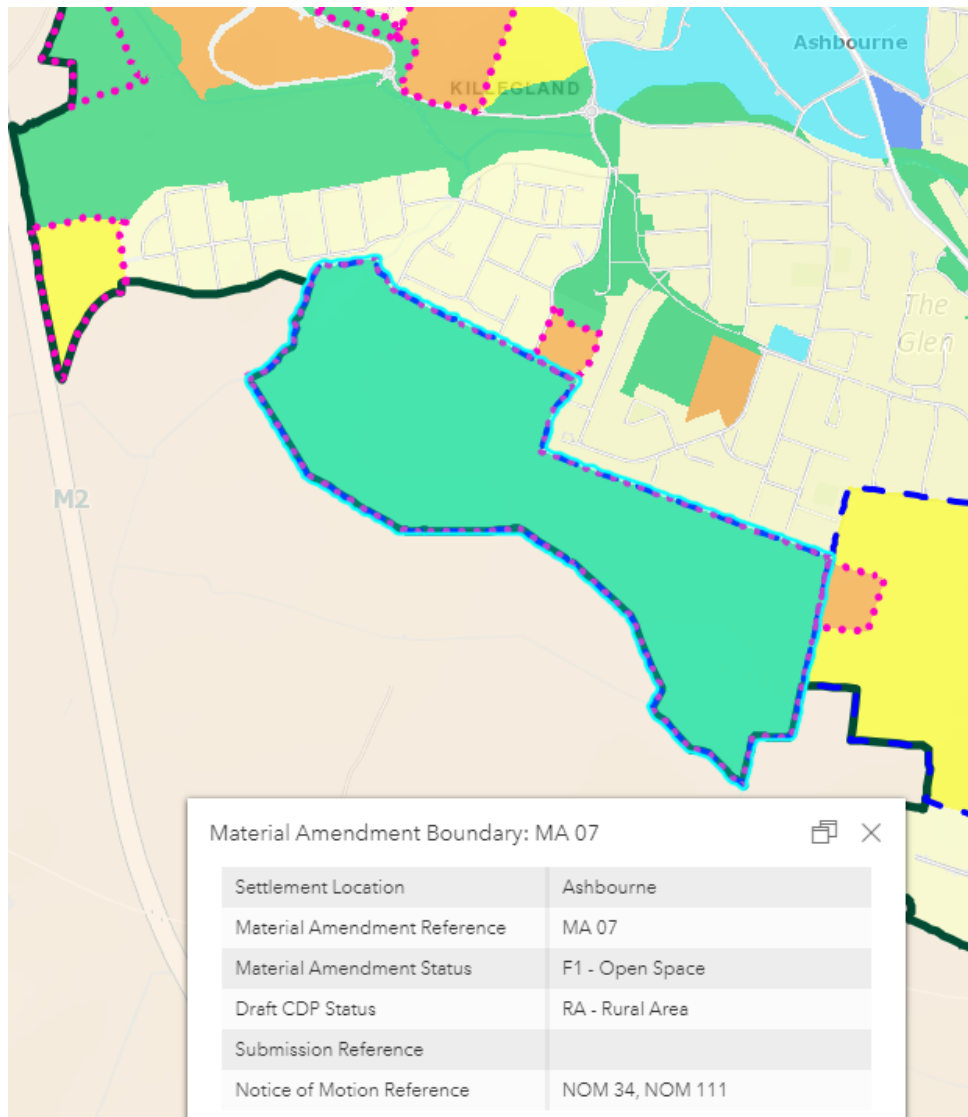


Figure 1.2. Proposed Zoning Map from Materials Amendments (source Meath County Council)

Whilst our client supports the generally principle of providing for more greenspace within and around Ashbourne, we note that the full strategic potential of our client's land to cater for Ashbourne's growth, including its ability to accommodate future parkland has not been properly considered and therefore the proposed zoning is premature.

The key reasons for this are identified are as follows:

- A full and proper assessment of Ashbourne's Open Space needs **must be carried out** and commissioned by MCC prior to any zoning;
- The proposed zoning **contradicts the Council's own Development Plan** which identifies that any such demarcation of land for larger open space should be done through a relevant Local Area Plan;
- The proposed zoning process **fails to consider any alternative options or robust analysis of the locational characteristics of the land;**
- The proposed location of the of zoned open space is unsuitable as it **will sterilise the future growth potential for Ashbourne;**
- The proposed adhoc zoning of the land for open space **fails to strategically consider Ashbourne's future** growth requirements beyond the next plan phase;

- The **lands should be safeguarded** to accommodate the future housing & live work community needs in 2026 and beyond;
- The proposed zoning approach **fails to adhere to the Development Plan, Guidelines for Planning Authorities, June 2007;**
- The proposed zoning **lacks foresight** and fails to consider the proper planning and sustainable development of the area; and

We submit that the Material Amendments to the *Draft Meath County Development Plan 2021 – 2027* affecting our client’s land is premature and the Draft Plan should look to generally retain the current status of the subject lands.

2.0 SITE LOCATION AND DESCRIPTION

The subject land is located to the southwest of Ashbourne. The site is bounded by a residential development at Churchfields, Bourne View and Bourne Avenue to the north, by the M2 Motorway to the west and by the R1255 (Ashbourne to Ratoath Road) to the south. A small parcel of the land is also located on the western side of the M2 Motorway. The site currently contains several different fields measuring approximately 97.4 hectares and is used for agricultural purposes. The land is located outside the current development area boundary of Ashbourne as per the Meath County Development Plan 2013 – 2019. (Refer Fig 2.1 & 2.2).

The surrounding area directly to the north is residential and zoned accordingly as *A1: Existing Residential* with a small plot of land south of Killelland Cemetery (F1 - Open Space) designated as A2 - New Residential within the current Meath County Development Plan 2013-2019 and the Draft Meath County Development Plan 2021-2027⁴.



Figure 2.1: Site Location within Ashbourne, taken from Google Earth. (Site Highlighted in Red with Yellow Star to represent Ashbourne Town Centre)

⁴ We note that there is also a proposed material alteration to the draft Development Plan to zone this land to F1 Open Space



Figure 2.2: Site Location Map, taken from Google Earth. (Site Highlighted in Red)

3.0 REGIONAL SPATIAL & ECONOMIC STRATEGY

The Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region was adopted on 28th June 2019.

At section 9.4 (Healthy Placemaking) of the RSES a number of 'Guiding Principles' for the creation of healthy and attractive places are set out including:

- *Provision of open space should consider types of recreation and amenity uses required.*
- *Public open spaces to have good connectivity and be accessible by safe, secure walking and cycling routes.*
- *Open space to be planned for on a multi-functional basis incorporating ecosystem services, climate change measures, Green Infrastructure, and key landscape features in their design.*

Further to the above, the RSES at page 69, notes that focus on compact growth and increased densities in urban areas will require a greater alignment between the development of communities and the provision and planning of open space to provide for the recreational and amenity needs of communities. In this regard the RSES supports the preparation of open space and parks strategies by local authorities.

The RSES includes the following relevant policy objectives:

RPO 9.14: Local authorities shall seek to support the planned provision of easily accessible social, community, cultural and recreational facilities and ensure that all communities have access to a range of facilities that meet the needs of the communities they serve.

RPO 9.17: To support local authorities in the development of regional scale Open Space and Recreational facilities particularly those close to large or growing population centres in the Region.

Whilst it is evident that RSES supports the provision of a range of open spaces and facilities that cater for the community and supports the provision of regional scale Open Space and Recreation Facilities, it is considered that this must be a plan led approach which commences with an Open Space Strategy as set out in the RSES. Furthermore, the provision of the land for a Regional/Town Park must consider all alternatives as well as the community's requirements as a whole prior to the zoning of land. As such, it is considered that the proposed zoning is premature.



4.0 EXISTING MEATH COUNTY DEVELOPMENT PLAN

The Meath County Development Plan 2013-2019 is the current relevant policy document applicable to the subject lands. Within the Development Plan, the Council states that Public Open Space is a critical element to the creation of a quality and distinctive urban environment, offering opportunities for both passive and active recreation, contributing to the quality of life of residents and visitors alike and offering environmental and ecological benefits.

Public open space has an important function and serves a variety of purposes. Accessible, useable, dedicated open spaces and recreational facilities to meet both passive and active recreational needs are vital for residential and recreational amenity. Previous Development Plans have tended in the past to emphasis detailed quantitative standards, but there is now an increasing focus on the quality of public open space, which ensures that the reasonable expectations of users are more likely to be fulfilled.

Section 5.10.2 (Public Open Space) of the County Development Plan states:

*'In new development areas, **local area plans should identify the preferred location of larger open spaces** including, if considered appropriate, locations in adjoining non-development areas.'*

[Our Emphasis Added]

Relevant Objectives and Policies include:

SOC POL 40: To encourage where possible local community involvement in the upgrading and improvement of open spaces.

SOC OBJ 7: To examine existing public open spaces and carry out improvements where necessary to increase their usefulness as recreational spaces.

*SCO OBJ 9: To **examine the adequacy of the existing level of public open space and recreational facilities and provide additional space and facilities as required**, in Large Growth Towns I & II and Moderate Sustainable Growth Towns, subject to the availability of the necessary resources. Large areas of public open space shall include recreational facilities for families including but not limited to walkways, new and/or increased playground facilities and alternative facilities for older youths as appropriate.*

[Our Emphasis Added]

It is evident from review of the existing Meath County Development Plan that the policy and objectives of the plan require the Council to examine the adequacy of the existing level of public open space and provide for additional open space as required. We say that this should be pursued through an audit of Council's open spaces and a needs analysis carried out by the Council. Furthermore, should a need for additional open space be identified following such review, the County Development Plan has preference that the preferred location of any such open space be identified through a local area plan.

The proposed process of zoning of our client's land for open space is premature and contravenes the existing open space objectives and policies of the Meath County Development Plans as the Council has not published an audit and needs assessment of on the level of open space required in line with SCO OBJ 9. Furthermore, any such demarcation of land for larger open space should be done through a relevant local area plan as stated in Section 5.10.2 of the Development Plan.

5.0 REVIEW OF THE DRAFT MEATH COUNTY DEVELOPMENT PLAN

The *Draft Meath County Development Plan 2021 – 2027* (the Draft Plan) sets out the policies and objectives and the overall strategy for the development of the County over the six-year period and beyond.

The Core Strategy (Chapter 2) acknowledges Ashbourne's designation as a Self-Sustaining Growth Town⁵ within RSES for the Eastern and Midland Region. A Self-Sustaining Growth Town being '*towns with a moderate level of jobs and services – includes sub-county market and commuter towns with good transport links and capacity for continued commensurate growth to become more self-sustaining.*'⁶. Further to this, the Core Strategy notes that development will be primarily concentrated in the '*Metropolitan Area (Dunboyne and Maynooth), the Regional Growth Centre of Drogheda and the Key Town of Navan*'⁷.

Section 7.7.7 (Open Space) of the Draft Plan recognises the importance of planning for quality open spaces, in this regard the draft plan highlights that the '*RSES supports the preparation of open space and parks strategies by local authorities*'. In this regard we note that Meath County Council have not yet prepared such a strategy.

Section 7.7.7 of the Draft Plan also highlights that Ashbourne will require the provision of a regional scale parkland type facility and notes that sites have been identified in volume 2 of the Draft Plan⁸.

Page 251, Section 7.7.7 of the Draft Plan also highlights that:

'Development Plans have tended in the past to emphasise detailed quantitative standards, but there is now an increasing focus on the quality of public open space, which ensures that the reasonable expectations of users are more likely to be fulfilled'.

The Draft Plan includes the following policies and objectives of relevance:

SOC POL 3: To ensure that, where practicable, community, recreational and open space facilities are clustered, with the community facilities being located in local centres or combined with school facilities, as appropriate. Community facilities should be located close to or within walking distance of housing, accessible to all sectors of the community and facilitate multi-use functions through their design and layout.

SOC POL 13: Ensure that all buildings, public and open spaces, recreational and amenity areas are accessible for people with disabilities, having regard to the Building Regulations, the objectives of 'Building for Everyone' (National Disability Authority) and 'Access for the Disabled' (No. 1 to 3)(National Rehabilitation Board).

SOC POL 38: To promote the development of a wide variety of high quality accessible open space areas, for both active and passive use, and formal and informal activities in accordance with the Core Strategy and Settlement Strategy and the standards set out in Chapter 11 Development Management Standards and Land Use Zoning Objective considering any environmental sensitivities including likely significant effects on European Sites (SACs and SPAs).

SOC OBJ 11: To carry out an audit of all public open space assets in the County over the life of the Development Plan.

⁵ within a Core region

⁶ Table 2.3 Settlement hierarchy for Meath

⁷ Page 38, Draft Meath County Development Plan 2021 - 2027

⁸ We note Volume 2 notes that suitable lands are to be identified rather than designating any site.



SOC OBJ 12: To prioritise the delivery of town parks at regional scale in Drogheda Southern Environs, Dunboyne, and Ashbourne.

SOC OBJ 15: To ensure public open space is accessible and designed so that passive surveillance is provided.

SOC OBJ 16: To provide multifunctional open spaces at locations deemed appropriate providing for both passive and active uses.

SOC OBJ 17: To ensure permeability and connections between public open spaces including connections between new and existing spaces, in consultation to include residents.

The Draft Plan Policies and Objectives (as exhibited) highlights the priority of a town park for Ashbourne. The Draft Plan also identifies the need for an Open Space and Parkland Strategy as well as an audit of the County's existing open spaces. It is considered that the zoning of our clients' land as proposed in the Material Alterations is premature and that the assessment and suitability of a wide array of options must be considered prior to any zoning occurring.

6.0 OPEN SPACE IN ASHBOURNE AND THE FUTURE ANALYTICS SUBMISISON

Figure 6.2 below highlights the quantum of land proposed to be zoned for Open Space in Ashbourne in the Draft Plan and is calculated as a total of 140.5ha. Whilst it is noted that this quantum of open space contains a mix of freely accessible and restricted access spaces, such as club grounds and golf course. The overall quantum of open space is proposed to be increased from the allocation of open spaces in the current Meath County Development Plan which is 96.0ha. This represents an overall increase of 44.5ha in the quantum of open space in Ashbourne in the proposed plan period.

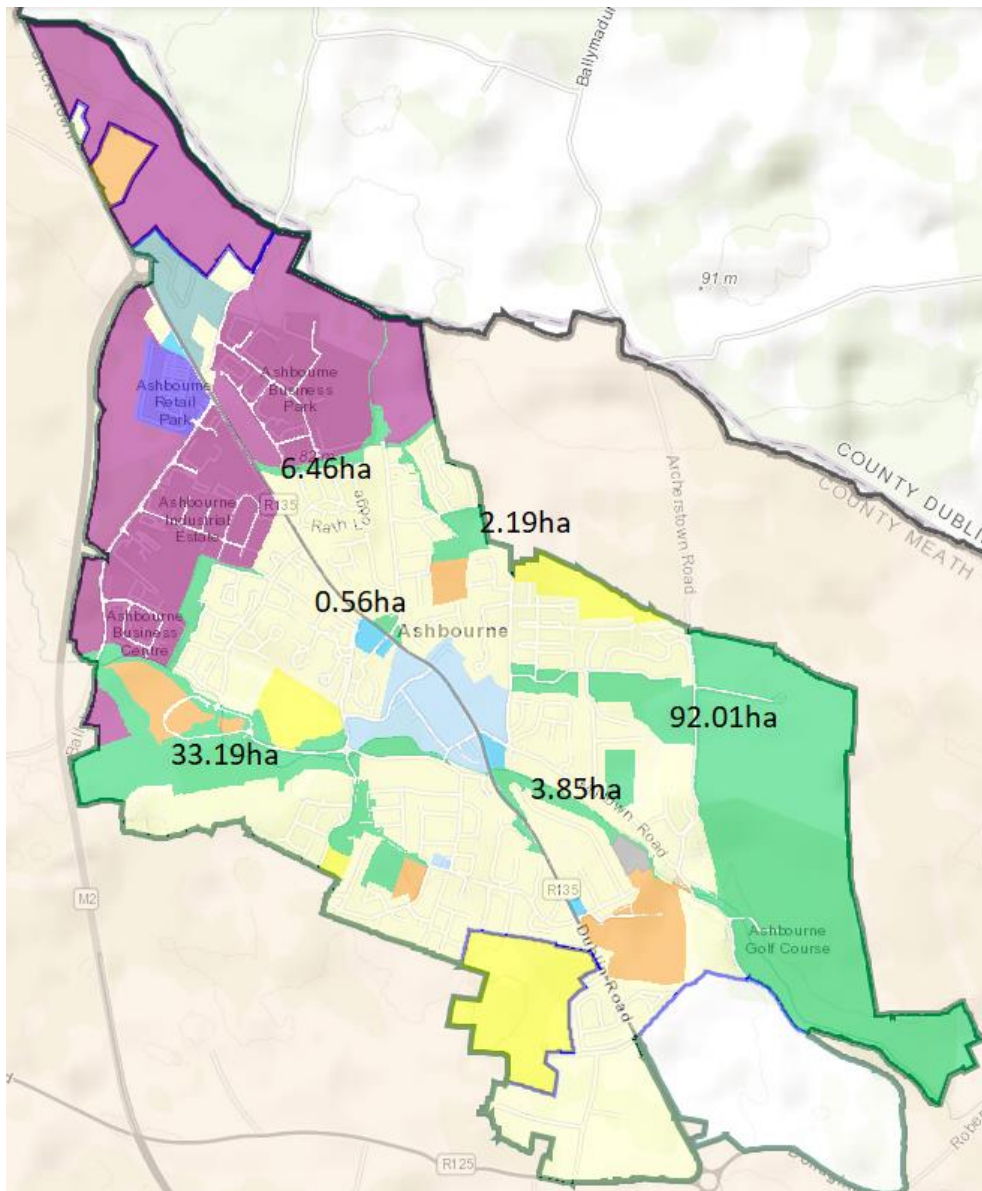


Figure 6.2: Development Plan Zoning Map (Open Space in Green), Future Meath CDP. Edited/cropped by TPA.

- 1. 33.19 Hectares of land currently zoned for Open Space forming the western part of the Linear Park and additional green space.**
- 2. 3.85 Hectares of land currently zoned for Open Space and proposed as the eastern part of the Linear Park.**
- 3. 6.46 Hectares of land currently zoned for Community Infrastructure and serving as green space between existing residential and employment lands in north Ashbourne.**
- 4. 0.56 Hectares of land currently zoned for Open Space and used as green space, north of the town centre.**
- 5. 2.19 Hectares of land currently zoned for Open Space within a residential area.**
- 6. 2.24 Hectares of land currently zoned for Open Space located within a residential area.**
- 7. 92.01 Hectares of land currently zoned for Open Space and in use as a range of sports clubs in the east of Ashbourne.**

Quantum of land currently zoned for Open Space in Draft Meath County Development Plan = 140.5 Hectares

It is noted that a high number of submissions in support of the provision of a Regional Park within Ashbourne and identifying our clients land as the preferred location have been received by Meath County Council during the public exhibition phase of the Draft Development Plan. These submissions have been largely supported by a submission by Future Analytics (FA) on behalf of Ashbourne Playspace Network (MH-C5-63).

The FA submission is also referred to in the above referenced motion put forward by the Ashbourne Municipal District Councillors at the January 2021 Special Planning Meeting and it is used as a justification for the proposed zoning of a significant amount of our client's land for open space.

The FA submission includes a desktop audit of open space within Ashbourne identifying a total of 96.0 ha of open space. It is noted that this audit was carried out in c.2017 prior to the proposed increase in open spaces as set out within the Draft Plan, as such there is an approximate difference of 44.5ha of open space now proposed (as per fig 6.2 above) within Ashbourne that was not previously accounted for in the FA submission.

Additionally, and notwithstanding this key difference, it is noted that the FA submission highlights the apparent shortage of 'Freely Accessible' open spaces with Ashbourne, again it must be noted that this submission was carried out in advance of the allocation of proposed open space within the Draft Plan. The Draft Plan includes zoning for a new area of open space along the eastern boundary of Ashbourne (between the Ashbourne Golf Course and the Ashbourne Rugby Club). This zoned land measures approximately 24.2ha and was previously not accounted for in the above-mentioned FA submission. There is nothing to suggest that this space could not accommodate a significant Town Park of Regional Scale, it also has the benefit of integrating within the existing golf course and Rugby Club.

Furthermore, it must be highlighted that the FA submission when comparing the provision of public open space in Ashbourne to other towns in the county, the submission chooses to focus on larger areas of open space and appears to discount certain open spaces despite the clear direction of the Draft Plan at Section 7.7.7 that:

‘Development Plans have tended in the past to emphasise detailed quantitative standards, but there is now an increasing focus on the quality of public open space, which ensures that the reasonable expectations of users are more likely to be fulfilled’.

[our emphasis]

In this regard we have reviewed the proposed total provision of open space as set out in the Draft Plan for the main towns of Navan, Kells, Dunshaughlin, and Ashbourne as set out in Table 6.1 below. These towns were chosen as they replicate those used in the FA submission. As can be seen in the below comparison of open space provision, Ashbourne ranks second to only Kells in terms of open space to be provided per predicted 1,000 head of population in 2026. However, open space in Kells includes the historic Commons of Lloyd which significantly skews hectares per 1,000 of population for this settlement. In this regard it can be seen that the general provision of open space for Ashbourne in the Draft Plan is far healthier than suggested in the FA submission.

Town	Open Space Provision (Ha)	Population 2026 (As per Vol 2 of the Draft Plan)	Ha per 1,000 Population in 2026
Ashbourne (Self-Sustaining Growth town in RSES)	104.5	15,897	6.5
Navan (Key Town town in RSES)	107.77	35,273	3.05
Kells (Self-Sustaining Growth town in RSES)	169.48* *inclusive of Commons of Lloyd	7,135	23.75
Dunshaughlin (Self-Sustaining Growth town in RSES)	31.33	6,235	5.02

Table 6.1: Comparison of open space provision

In addition to the above referenced submission by FA, we note that a further addendum submission was prepared by FA in November 2017 and identified based on updated population projections that the requirement for open space in Ashbourne by 2026 would be between 25.9 – 33.4 ha.

With an increase of 44.5ha of open space identified in the Draft Plan since the 2017 submission by FA and 25ha located in one consolidated parcel on the eastern side of Ashbourne, it is considered that the required provision of increased open space as identified in the FA submission has reasonably been provided for in the Draft Plan already.



The FA submission was commissioned by a 3rd party and was carried out in 2017, prior to the inclusion of c.140.5 ha of open space in the Draft Plan, including a single land bank in excess of 25ha along the eastern boundary of Ashbourne. Notwithstanding this, the Material Amendments proposed, which will zone 33.4 ha of our clients' land for open space, fails to acknowledge the increase in open space provided for within the Draft Plan, nor does it rely on an independent or current analysis of open space provision by Meath County Council, as such it is considered that the proposed zoning is premature and not strategically supported.

The Draft Plan provides for the quantum of open space previously identified in the Future Analytics submission, furthermore, there has been no strategic assessment of Ashbourne's open space needs by Council, nor have alternative options been appropriately considered for the provision of future open space.

It is considered that the zoning of our clients' land as proposed in the Material Alterations is premature and that the assessment of Ashbourne's Open Space needs must be carried out and commissioned by Meath County Council prior to any zoning.

7.0 ASHBOURNE'S FUTURE HOUSING AND LIVE/WORK COMMUNITY NEEDS

In order to understand Ashbourne's future housing needs in 2026, we have reviewed the Draft Plan's approach to Population Forecast and Projected Housing Demand (Refer to Appendix A of this submission). As per the draft Written Statement for Ashbourne, population within the town is expected to increase by 3,200 persons. It is estimated that c. 1,280⁹ new homes would be required to cater for this increase in population.

In order to cater for this projected increase, the Draft Plan proports that an estimate of 1,349 new homes will be provided and occupied over the plan period. This number of units would be added to another 351 units which could be delivered on infill/brownfield lands during the plan period, resulting in a total of 1,700 units if 100% of permissions are converted to homes.

Our analysis of Ashbourne's conversion rate of permissions to homes over the previous plan period would suggest that a very maximum of 92.7% of permissions could be converted to homes during the plan period (noting that the conversion rate for the County as a whole was 42.4% during the same period). Therefore, the Draft Plan at a very generous estimate will provide for the delivery of an estimated 1,576¹⁰ residential units by 2026 (296 units in excess of the required minimum). Should Ashbourne's very high conversion rate of Permissions to Homes reduce over the next plan period then there is a risk that not enough homes will be provided. Notwithstanding this, it is evident that by 2026, more land will be required to cater for Ashbourne's growth. As a result, it is imperative that strategically located lands are protected for the future growth requirements of Ashbourne.

The Draft Plan conservatively provides for Ashbourne's housing and live/work community needs over the next plan period, however, should conversion rates of permissions to homes reduce there is a risk of undersupply. Notwithstanding this, it is clear that more land will be required to cater for Ashbourne's housing needs beyond 2026. As such, it is imperative that strategically located lands such as our clients are safeguarded for the future growth requirements of Ashbourne.

⁹ Assuming 2.5pph as per the Draft Plan

¹⁰ Generously assuming a 92.7% conversion rate



8.0 STRATEGIC LOCATION OF THE SUBJECT SITE

Our client's lands, known as Killegland Farm is strategically located on the south-western fringe of Ashbourne's residential footprint. The land which is under the one ownership is adjacent to a range of existing services and infrastructure.

The centre point of our client's lands are approximately¹¹:

- 650m from St. Declan's National School;
- 1.1km from Coláiste De Lacy;
- 940m from Donaghmore Ashbourne GAA Club;
- 650m to existing Bus Route 105X at Hickey's Lane;
- 1.5km to existing Bus Routes 103, 103X & 109A at Nine Milestone;
- 1.3km from Ashbourne Community Centre;
- 1.25km from Ashbourne Town Centre; and
- 1.5km to the west of the proposed Strategic Employment Zone

It is considered that the site's physical location and proximity to the above range of current and future infrastructure, ensures that the land would be the logical and sequential expansion of Ashbourne's residential footprint. The lands are owned by one landowner, and this should assist in agreeing, planning, and implementing the future strategic growth and development of Ashbourne. As discussed in Section 7.0 above, it is evident that by 2026 more land will be required to cater for Ashbourne's growth, therefore it is logical and proper planning that a strategic land bank such as our client's land should be protected for future growth and development.

The protection of this land for future residential growth will also ensure that Ashbourne can grow in a consolidated manner rather than continued linear growth southward along the Dublin Road. This consolidated growth of Ashbourne is supported by National Policies such as

- NPF National Policy Objective 3a which aims to deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements.

The proposed concept of protecting the identified lands at Killegland as a future growth corridor is not the first time that this idea has been espoused. We refer to the Meath County Council's own submission to the Regional Spatial and Economic Strategy (RSES) in 2019 which sought to emphasise Ashbourne's predicted future growth direction, clearly highlighting our client's land along with the now proposed Strategic Employment Lands in the south-east (Refer Figure 8.1 below). In this regard, we support the position put forward by Meath County Council in its 2019 submission to the RSES that the future potential of Ashbourne as a centre for growth should be maximised. In doing so, the required lands to facilitate future expansion must be protected.

¹¹ As the crow flies

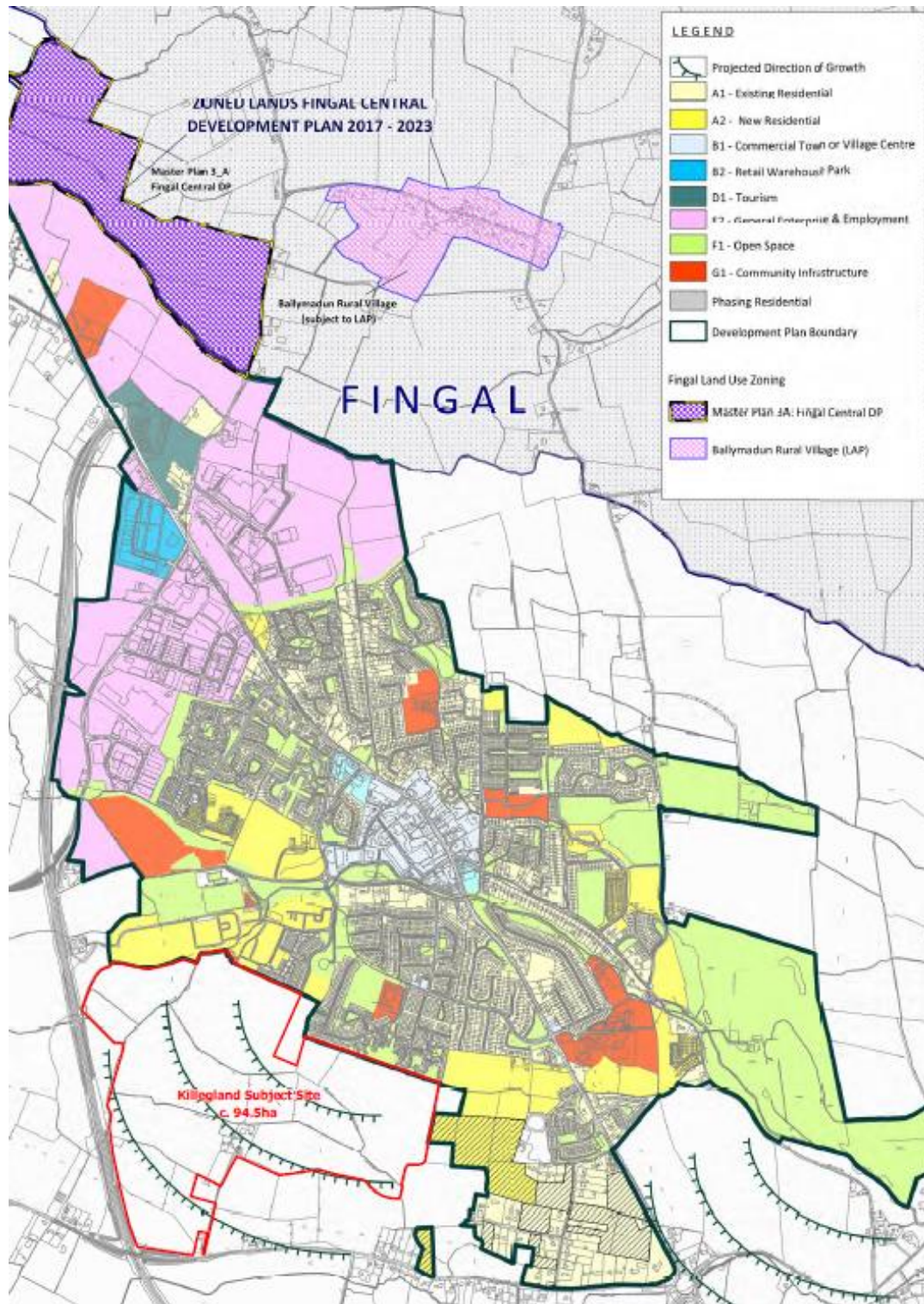


Figure 8.1: Ashbourne Land Zoning submission to RSES (2019) with predicted direction of growth (Site Highlighted in Red).

It is further noted that the lands directly to the east of our clients' land are to be zoned to A2 – New Residential (Masterplan 1 [MP1]). In response to submission MH-C5-86, the CE's Report confirmed support for the provision of a distributor road through these lands which would meet the longer-term development needs of the area. Whilst any such detail regarding this future road would be determined through the preparation of a masterplan for the MP1 zoned land, it is logical that the road would connect to our clients lands and even through them in the future to ensure land is not land locked and that the provision of services in the area is logical and sequential, thus further unlocking the future growth potential of this land.



Should the land be zoned to the same extent and location as identified in the proposed Material Amendments (Refer Fig 1.2) the logical strategic growth corridor for Ashbourne's growth would effectively be severed, leaving the only foreseeable expansion of Ashbourne in a south-easterly direction or the development of the southern part of our clients lands at some stage in the future. Neither being the preferred and logical expansion of Ashbourne's footprint.

Our client's land is strategically located to provide for the future growth and expansion of Ashbourne in a sustainable and compact manner and should be protected as unzoned land for this plan period. To zone the northern portion of the site for open space would represent short term planning without proper analysis of the longer-term strategic requirements for Ashbourne.

9.0 SUITABILITY OF PROPOSAL TO ZONE LAND AS OPEN SPACE

At its January Special Planning Meeting, Meath County Councillors for Ashbourne Municipal District put forward a motion proposing the zoning of more than 30 hectares of our client's land to be zoned as F1 -Open for use as parkland. As discussed above, the motion put forward appears to rely on an outdated Future Analytics assessment of the quantum of open space within Ashbourne. This assessment was carried out in 2017, prior to provision of additional zoned land for open space within the Draft Development Plan and therefore cannot be relied on as a current audit of open space within Ashbourne.

Notwithstanding this, our analysis of the proposed zoning clearly highlights that the zoning of 33 ha along the northern portion of our client's land for open space as set out in Fig 9.1 below is flawed for the following reasons:

- The proposed zoned land would be 2.5km walking distance from northern residential parts of Ashbourne and therefore private transport will be a significant mode of transport to access the parkland;
- The proposed zoned land would depend on future road access from the east. The timing of this access is unknown as no development proposal or masterplan exists for this land as such the zoning is premature;
- The indicative scheme for the zoned land (Fig 9.1) does not provide for carparking, access for persons with limited mobility or sustainable travel options;
- The indicative scheme lacks any reasonable means of access to the playing pitches, playgrounds, and other facilities;
- The Draft Plan already provides for 25ha of zoned land with access and adjacent to existing facilities, representing a far more achievable 'Town Park' location in the near term.

The combined effect of these issues makes it clear that there are real concerns with the designation of our clients' land for open space in terms of the quantum and location currently proposed. In this regard, the Department of the Environment, Heritage and Local Government set out in their 2007 Planning Guidelines a number of matters¹² which should be addressed when considering the proper planning and sustainable development of the area and making

¹² Section 4.12, Development Plans, Guidelines for Planning Authorities, June 2007



decisions to zone land. An assessment of the current proposed zoning is set out under these headings:

9.1 Need

The aforementioned Planning Guidelines state that *'the amount of land to be zoned for any particular land-use must be clearly based on, and justified by, a realistic assessment of need. The survey and analysis stage of plan preparation should provide the baseline data to determine future land requirements.'*

Our review of the Draft Plan does not indicate that any realistic assessment of need has been carried out by the Council in pursuing the proposed zoning. The proposed zoning is based on an outdated 3rd party assessment which was carried out prior the council's own designation of additional open space in the Draft Plan. As such it is abundantly clear that the underlying strategic work required to support such a zoning proposal has not been undertaken to date.

Further to this, Section 4.14 of the Planning Guidelines state that:

'the demands of individual landowners should not distort the preferred amount and location of lands to be zoned',

In this regard we say that the demand of individual groups or organisations should also not distort a fair and orderly planning process. As such a proper and independent needs assessment must be carried out by the Council to determine the required quantum of open space before decisions on zoning particular parcels of land are made.

9.2 Policy Context

It is clear that the underlying policy context supports the provision of more open space in Ashbourne, as well as most other parts of the County. The benefits of quality open space provision are undeniable. Notwithstanding this, the Planning Guidelines states that:

*'Both **the amount of land to be zoned for development and the proposed location of that land will also need to be influenced by other plans and strategies**, from national and regional to local levels so that local authorities play their full part in supporting the implementation of those national and regional strategies.'*

[Our Emphasis added]

There is no empirical evidence to suggest that any strategic work has been undertaken to zone our clients land for open space. The proposed zoning is based on 3rd party influence which is clearly outdated. The proposed zoning is flawed as it is not currently supported by the required strategic planning background. No assessment has been undertaken in relation to the required quantum of land or in relation to the highest and best location for future open space. As such the proposed zoning fails in terms of 'Policy Context'.

9.3 Water, Drainage and Roads Infrastructure

The Planning Guidelines are clear in their direction that:

'land should not be zoned if there is no reliable prospect of providing key physical infrastructure, within the plan period or a reasonable time period thereafter.'

Our client's land is currently without sufficient access to cater for a Regional Town Park of the scale that would be provided by the proposed zoning. Whilst the lands to the east are proposed to be zoned for future residential development, it would be imprudent to assume that the required physical connections to our client's land would be provided over the next

plan period given the scale and quantum of the future residential zoned land to the east. Logically it could be 7-9 years before the land to the east is built out and future physical connections to our client's land are provided. As such it is clear that the proposed open space zoned land has little to no chance of being provided with the required physical infrastructure within the plan period or a reasonable time thereafter.

9.4 Supporting Infrastructure and facilities

The Planning Guidelines require planning authorities to have consideration for the future availability of, or the capacity to provide supporting infrastructure when allocating land for development. In this context the development of a Regional Park will need to consider the ability to provide for sporting facilities, open space works, civil infrastructure, security systems and numerous other supporting facilities within the proposed zoned land. Furthermore, the planning authority will need to be in a position to purchase the land from our client at fair market value and even then, there is an unfounded assumption that our client would be willing to sell the land to the Council.

It is abundantly clear that the proposed zoning fails to meet the relevant criteria for supporting infrastructure and facilities as the Council does not own the land nor has it identified a mechanism to take ownership of the land in the next plan phase, as such it is not possible for the land to be delivered in the next plan phase or anytime afterwards.

The illustrative Masterplan prepared by Councillors (See Figure 9.1 below) shows the scale and quantum of the proposed park. The southernmost point of the park lacks passive surveillance and has the potential to attract anti-social behaviour.



Figure 9.1: Illustrative Masterplan of proposed park at Killlegland, used by Councillors in support of motion, edited/cropped by TPA.

9.5 Physical Suitability

Section 4.18 of the Planning Guidelines state that:

‘The development plan should strive to ensure that the form and location of new development offers the best “value for money” in terms of efficient use of existing infrastructure, while minimising the need for costly new infrastructure. Where land in green-field locations is to be zoned, account should be taken, in considering the different options available, of the land’s capacity for development by way of the most cost-effective means of providing the necessary infrastructure.’

For the reasons outlined in our submission above it is evident that the proposed zoning fails to offer the ‘best value for money’ option to provide for open space in and around Ashbourne. Not only will the Council need to purchase the land at a substantial cost, but they will need to provide the required physical access to the land which currently does not exist. Furthermore, the use and development of the land for open space will need to consider the existing physical constraints of the site including flood prone areas of land. Finally, alternative options within Ashbourne already exist for the provision of open space, such as the land between the Ashbourne Golf Course and Ashbourne Rugby Club. This land is already included as open space in the Draft Plan and is provided with existing physical access, thus offering a better ‘value for money’ option.

9.6 Sequential Approach

Whilst it is acknowledged that the proposed zoning follows the sequential approach in terms of zoning outwards from the centre of Ashbourne’s urban area, instead of facilitating sustainable development, the proposal will have the opposite effect as it will stifle the future sequential growth of Ashbourne by creating a de-facto ‘green wedge’. This will in reality mean that any future growth of Ashbourne in the south-west cannot follow the sequential approach and the growth of Ashbourne will be stifled resulting the ‘leapfrogging’ of services.

Whether or not there is a demonstrated need for the proposed open space, the proposed location is inexcusably wrong as it will damage Ashbourne’s future potential and result in a land use that does not represent the highest and best use of the land, nor does it have informed foresight as to how Ashbourne might grow and expand in the future.

The proposed zoning fails to meet the criteria set out within Section 4.12 of the Planning Guidelines when considering the suitability of specific lands for zoning, as such, it is clear that the proposed zoning fails to consider the proper planning and sustainable development of the area.

10.0 ALTERNATIVE ZONING OPTIONS

Notwithstanding our position that the proposed zoning is premature, fails to consider the proper planning and sustainable development of the area, does not meet the criteria as set out within the relevant Planning Guidelines and will stifle the future growth of Ashbourne, we have been requested by our client to review an option which may potentially protect the strategic location of our clients land for future growth in future plan phases whilst providing for zoned open space land in line with the general objectives set out within the relevant plans and policies and general principles for placemaking.

We must stress that the below 'Option B' in no way detracts from TPA's professional opinion that the proposed zoning is premature for the reasons outlined and discussed in our above submissions.

10.1 Preferred Zoning Option – Land remains unzoned.

In our preferred Option A, it is proposed that the overall quantum of land zoned remains unzoned and protected for the next plan phase where its future use shall be reviewed. This will enable the land to be protected for potential future residential or other growth options. Its location within Ashbourne will play a key role in helping the town and the county achieve its housing numbers.

10.2 Alternative Zoning Option B – Land Partially Zoned F1 – Open Space

In reviewing the submissions received relating to the future desire for 33 ha of future open space designation to be provided and seeking to protect the future growth potential of Ashbourne we have identified a significant portion of our client's land (8ha) which could be zoned for open space (see Figure 10.1). This land is located in the north-western part of the site and would allow for the future zoning of the remainder of the land to the southwest.

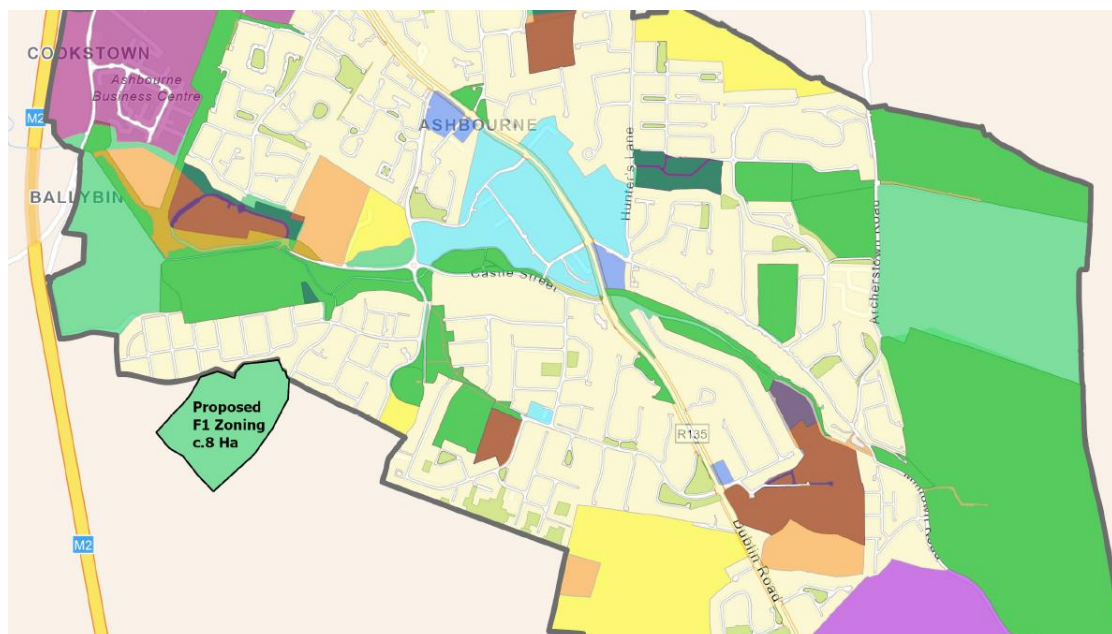


Figure 10.1: Suggested Location of any proposed Open Space Zoning (Open Space in Green) Future Meath CDP.
Edited/Cropped by TPA.

This quantum of land would reasonably provide for a 'Regional Town Park' and would also have the direct benefit of connecting into the western spine of the Linear Park that traverses Ashbourne (see Figure 10.2). It is worth noting that much of the land safeguarded for the Linear Park has yet to be developed approximately 10 years later. Whilst access to the proposed 8-hectare site would also be an issue (similar to the current Council proposal), it is considered that physical connection to the site can be provided from the north in the short term and the east in the longer term. This option would allow the remaining land to be safeguarded as a logical extension of the established residential area. This zoning also provides a substantial buffer between any future residential development to east and the M2 motorway.

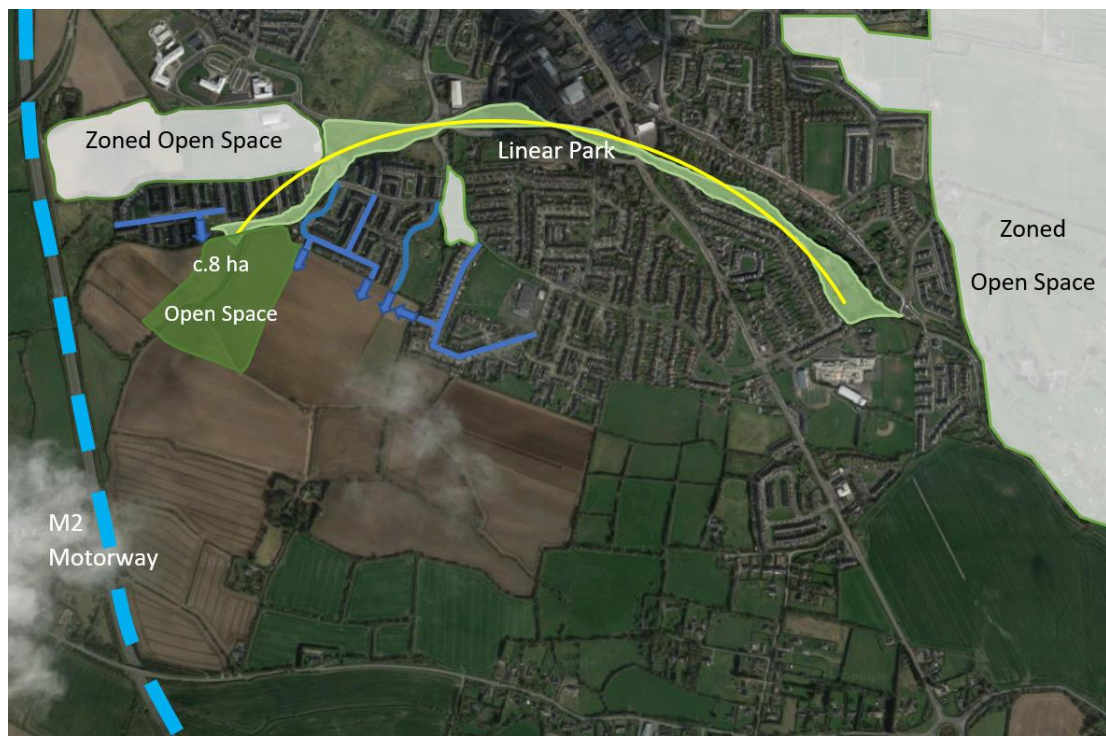


Figure 10.2: Suggested Location of proposed Open Space Zoning showing integration with Linear Park. (Google Maps, edited by TPA.)

The proposed Option 2 Open Space would also be located on land that is within the flood zone of the Broadmeadow River (See Figure 10.3 below). This area of the site would be less suitable for residential or growth-related development, and the river and its floodplain could be incorporated into aspects of the park such as walkways, trails and/or wetlands.

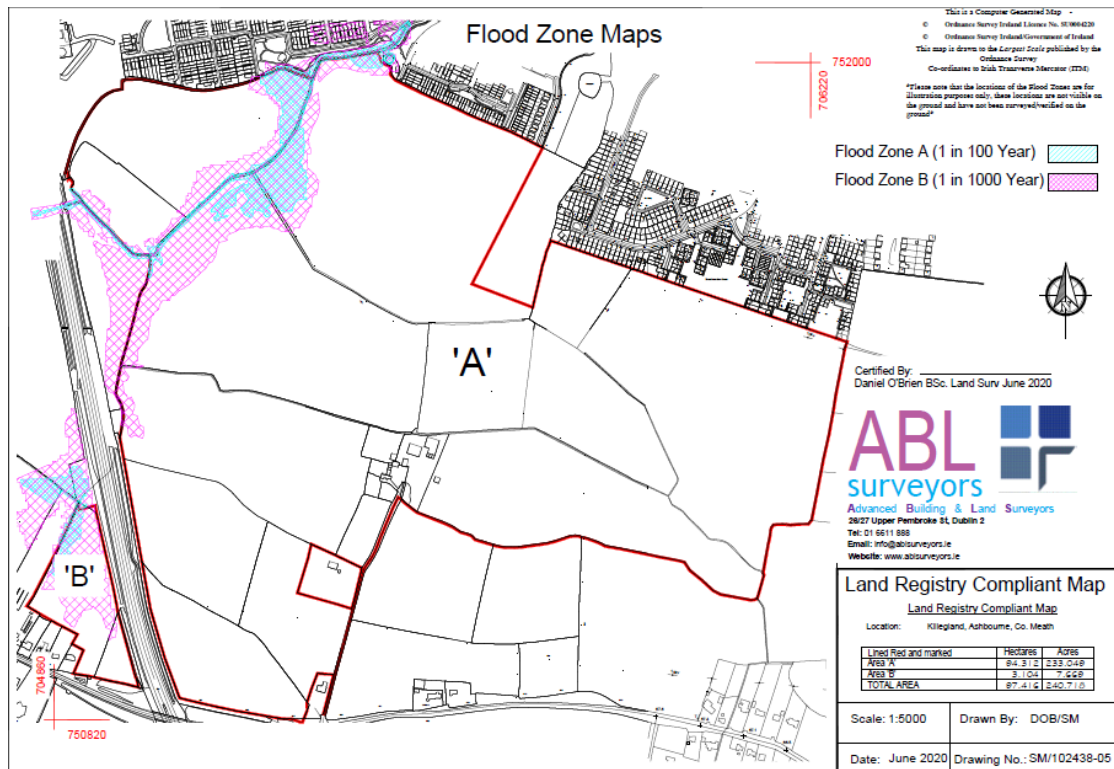


Figure 10.3. Flood Zone Map prepared by ABL Surveyors, 2020.

The location of this park would allow for the remainder of the site to remain as unzoned to ensure that this future area of growth can be protected and would also protect the sequential growth of additional land not in the ownership of our client, located to the south-east.

11.0 CONCLUSION

As discussed in this submission, the proposed zoning of our client's land as set out within the Material Alterations of the Draft Plan is fatally flawed for the following reasons:

- It is considered that the zoning of our client's land as proposed in the Material Alterations is premature and that the assessment of Ashbourne's Open Space needs must be carried out and commissioned by Meath County Council prior to any zoning;
- The Draft Plan already provides for the quantum of open space previously identified as being required in the Future Analytics submission referred to in the Councillors resolution;
- The proposed zoning contradicts the Council's own Development Plan which identifies that any such demarcation of land for larger open space should be done through a relevant local area plan;
- The proposed zoning process fails to consider any alternative options or robust analysis of the locational characteristics of the land;
- The proposed location of the of zoned open space is unsuitable as it will sterilise the future growth potential for Ashbourne;
- The proposed adhoc zoning of the land for open space fails to strategically consider Ashbourne's future growth requirements beyond the next plan phase;
- Our client's lands should be safeguarded to accommodate the future housing need in 2026 and beyond;



- The proposed zoning approach fails to adhere to the *Development Plan, Guidelines for Planning Authorities, June 2007*; and
- The proposed zoning lacks foresight and fails to consider the proper planning and sustainable development of the area.

Whilst we stringently outline that the case against zoning our clients land in this Draft Plan phase, we have been requested by our client to put forward a more viable option for the delivery of open space and safeguarding of land for future growth and development should the Council continue to pursue zoning open space for a 'Regional Town Park'.

In this instance it is suggested that Meath County Council should reconsider the location of an proposed F1 – Open Space zoning as set out in our above 'Option B'. This is to ensure that lands logically located within Ashbourne's future growth direction can accommodate significant residential development in future plan phases and are not disconnected from Ashbourne's urban footprint.

We submit that the proposed zoning of our client's land as set out within the Material Amendment's phase of the *Draft Meath County Development Plan 2021 – 2027* is premature, flawed and not in line with proper planning and sustainable development. As such, the land should remain unzoned.

Notwithstanding this, should the Council continue to pursue additionally zoned open space

Should you require any further information in relation to this submission, please do not hesitate to contact us.

Yours faithfully,

Brian Minogue
Senior Planner
Tom Phillips + Associates



APPENDIX A – Ashbourne’s Housing Need In 2026