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Department within KPMG: KPMG Future Analytics, Chartered Planning and Development Consultants

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

Re: Submission to Proposed Material Alterations to the Draft Meath County Development Plan 2021-2027 - Proposed Enfield Amendment No. 6

Dear Sir/Madam.

1.0 Introduction

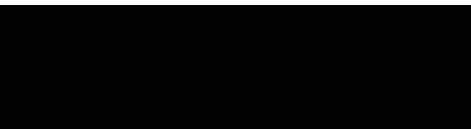
This submission has been prepared by KPMG Future Analytics, 1 Stokes Place, St. Stephen's Green, Dublin 2 (Chartered Town Planning and Development Consultants) on behalf of Mr. Michael Ryan, The submission is in response to Meath County Council's publication of the proposed Material Alterations to the Draft Meath County Development Plan 2021-2027 and relates specifically to 'Proposed Enfield Amendment No. 6'.

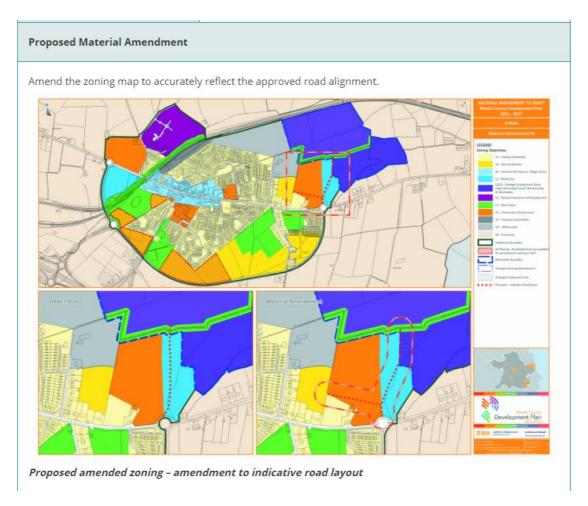
2.0 Proposed Enfield Amendment No. 6

Meath County Council describes the Proposed Enfield Amendment No. 6 as seeking to "Amend the zoning map to accurately reflect the approved road alignment".

The proposed material alteration re-aligns the routing of the subject road on the land use zoning map to reflect the consented layout, as put forward in Notice of Motion 152 and in submission MH-C5-379 during the public consultation window for the Draft Plan:

Amendment No.:	Proposed Enfield Amendment No. 6
Submission/ NOM/ (FTF) NOM Numbers	NOM 152 <i>Cllr. Niamh Souhan</i> MH-C5-379 <i>Future Analytics on behalf of Michael Ryan</i>





3.0 Directly Relevant Recent Planning History

In order to ensure that the Meath County Development Plan 2021-2027 accurately reflects the road alignment that is consented and under construction at this location. The permitted alignment was established under planning consent Reg. Ref. TA/160382 and subsequently amended under Reg. Ref. TA/191820.

Under Reg. Ref. TA/160382, planning permission was granted by Meath County Council for a 90 bedroom 3-storey nursing home, together with new vehicular road access from the existing roundabout (at the junction of Dublin Road/Johnstown Road and R148), boundary treatments, landscaping, potable water supply from well, car parking, signage, drainage connections and all associated site development works. In addition, under Reg. Ref. TA/191820, permission was granted for amendments to the road layout and water services networks previously permitted to serve Reg. Ref. TA160382. The amendments included: (1) changes to the permitted distributor road layout, including an extension to same in lieu of the 3.0 service road, and an altered nursing home access road, entrance and turning area; and (2) amendments to the permitted mains, foul and surface water networks and increased attenuation capacity. Permission was also sought for the development of an attenuation pond to serve the development, a pedestrian and cycle connection to lands to the west and all ancillary works to facilitate the development. This application was the subject of a Request for Further Information relating to engineering services considerations and was granted planning permission in June 2020.

Accordingly, the above consents establish planning permission for the new link road into the subject lands from the existing roundabout on Dublin Road, drawing efficiencies and integration with the requisite road and related infrastructure to accommodate the Department of Education and Skills' intention of delivering a school at this location, together with the delivery of the permitted nursing home as outlined above.

Indeed, the Department of Education and Skills was granted planning permission for the school development at this location in June 2021, which reaffirms the suitability of the consented road alignment. The project comprises a part three-storey, part two-storey Post Primary school , including PE Hall, 4 Classroom Special Educational Needs Unit and all ancillary site works. It also incorporates associated staff car parking, delivery access, drop off areas, pedestrian access, bicycle lane, construction of 6 No. external ball courts, landscaping, connection to public services, ESB substation and all associated siteworks.

For the avoidance of any doubt, a copy of the permitted road alignment has been submitted in AutoCAD format, which may assist Meath County Council in incorporating same into the zoning maps of the Meath County Development Plan 2021-2027.

4.0 Land Use and Transport Planning Integration

This submission proposes the following adjustments to the Development Plan at the location of Proposed Enfield Amendment No. 6, in the interest of orderly development having regard to the correct alignment of the consented road at these lands being reflected on the zoning mapping:

- As a consequence of the corrected road alignment i.e. now reflecting the already permitted and under construction road alignment, it is submitted that an unintended anomaly has arisen which it is important to correct at this juncture. The proposed land use zoning of the lands through which the permitted road corridor navigates is "C1 Mixed Use". The land use and transport network anomaly is such that the corridor effectively severs the intended mixed use development lands, resulting in plots of land that will be invariably difficult to design and develop for a mix of uses in accordance with the zoning provisions.
- Therefore, we propose the practical rationalisation of the land use zoning at this location, in the interest of orderly development, whereby the "G1 Community Infrastructure" land use zoning would be marginally enlarged so that it runs to the western side of the permitted, under construction road.
- It is also proposed that the portion of "C1 Mixed Use" lands that would be reassigned to a "G1 Community Infrastructure" zoning to facilitate the above, would be redistributed to a plot on the eastern side of the permitted, under construction road. It is important to note that said lands are already proposed to be zoned development, presently identified for land use objective "E1/E3 Strategic Employment Zones (High Technology Uses)/Warehousing & Distribution". Therefore, this change to zonings would represent a re-balancing of proposed land use zonings to more fully reflect and align with the permitted and under construction road at this location.
- It is submitted that there is a clear and defensible planning logic and rationale for the proposed adjustments outlined above, not least in seeking to recalibrate in practical terms the developability of the plots of land within the life of the development plan, and to enhance the legibility and coherence of land uses arising. Furthermore, it will serve to better facilitate the realisation of an 'active urban edge' profile along the consented road and afford future development prospects the clarity and consistency needed for land use appraisal and scheme implementation. Finally, it will subtly rebalance the land use zoning provision in this part of east Enfield, enhancing the prospect for community infrastructure and mixed uses being realised, at a scale commensurate with the existing Enfield town centre, together with local service provision for future tenants on the "E1/E3" lands to the east.
- As a further direct consequence of the introduction of the consented road corridor from the roundabout in question, it is submitted that an "indicative access/egress" should be included further to the east (along the R148) as a practical means of serving and indeed unlocking the "E1/E3" zoned lands at this location. Having a dedicated means of access/egress for future employers and their workforce locating on the "E1/E3" lands is both important from an operational perspective and from a land use compatibility and safety perspective, cognisant of the Post Primary school having recently been granted planning permission.

The proposed amendments outlined above are briefly mapped in the imagery below, to ensure clarity and certainty for Meath County Council in considering this proposal:



5.0 Conclusion

The wider landholding to which these sites relate have direct connections to the existing town centre and a strong ability to deliver further sustainable integration with the town core. Indeed, the Draft Plan vision for Enfield is to develop as a 'Self-Sustaining Town' – these lands represent the opportunity to realise this vision, delivering an appropriate mix of (employment-led) uses. To become a "Self-Sustaining Town", Enfield needs to unlock this strategic landbank and integrate it with the rest of Enfield through connections and complementary uses. The preparation of a masterplan for the lands will ensure a planled approach is delivered, yet it is important to note that the overall extensive landholding has been master-planned in recent years and that this was presented to the Planning Department in initial preplanning consultation.

It is also important to note that the practical amendments outlined within this submission contribute to a more coherent and legible pattern of land use and will result in a stronger overall environment to contribute to and enhance the settlement of Enfield.

We trust that the above is clear and presents a compelling justification for incorporation into the Meath County Development Plan 2021-2027.

Yours faithfully,

Stephen M. Purcell

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Director and Co-Head

KPMG Future Analytics, Chartered Planning and Development Consultants

Encl.