

Planning Department  
Meath County Council  
Buvinda House  
Dublin Road  
Navan  
Co. Meath  
C15 Y291

[By: Online Consultation Portal]

Tuesday, 29<sup>th</sup> June 2021

Dear Sir/Madam,

**RE: SUBMISSION ON MATERIAL AMENDMENTS TO DRAFT MEATH COUNTY DEVELOPMENT PLAN 2020 – 2026 ON BEHALF OF LEANORT ULC.**

## **1.0 INTRODUCTION**

Tom Phillips + Associates<sup>1</sup>, Town Planning Consultants, have been retained by Leanort ULC<sup>2</sup> to prepare a Submission in respect of the *Material Amendments to the Draft Meath County Development Plan 2020-2026* on their behalf.

Leanort ULC control two landholdings in Trim town, see Figure 1.1 (referred to in this Submission as Sites A and B). These lands are centrally located within Trim and are capable of delivering mixed use sustainable development, which will result in the consolidation of the town centre and the further economic development of the town. The zoning of the sites under both the *Trim Development Plan 2014 – 2020* and the *Material Amendments to the Draft Meath County Development Plan 2020 – 2026* is as follows:

- Site A: C1-Commercial/Town Centre; A1-Existing Residential and F1-Open Space at the town centre expansion area; and
- Site B: C1-Mixed Use at the Athboy Road site.

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<sup>2</sup> The Tannery Office Building, 53-56 Cork Street, Dublin 8, D08 X31R.

Design development for Site A is now progressing and a full design team has been appointed in order to progress the delivery of a high quality new urban quarter for this key Town Centre site. Our Client is committed to ensuring that the development proposals contribute to the vitality and vibrancy of Trim and the wider area.



Figure 1.1 Site Locations, within the centre of Trim (Source: Googlemaps, annotated by TPA, 2020)

## 2.0 SUBMISSION ON MATERIAL AMENDMENTS

The purpose of this Submission is to support the following Material Alterations to the Draft Plan relating to lands in Trim.

### 2.1 Proposed Trim Amendments No. 4 (MH C5 652): Rezoning

The change of zoning of part of the Site A lands from B1 (Town Centre) to C1 (Mixed Use) zoning Objective. This will result in a greater proportion of residential development within this key site, which will result in 24hr activity in this new part of the town and support the local commercial services.

### 2.2 Proposed Trim Amendments No. 8 (FTF NOM 42): Masterplan

This Amendment outlines a Masterplan boundary which includes Site A and adjoining lands as Masterplan No. 31.



**Source: Material Amendments to Draft Meath County Development Plan, 2021.**

Our Clients were in the process of preparing a Masterplan for their landholding, prior to the publication of the Draft Plan, in order to ensure that the future development of this sizable site was planned and orderly and to ensure that opportunities for planning gain are realised.

This *Material Amendment to the Draft Plan* now proposes to include the Site A lands within a formal Masterplan mapped in the Development Plan. This Masterplan also includes the lands to the east (between Site A and Emmet Street, incorporating parts of the existing built-up town centre and the OPW site).

On foot of this alteration to the Draft Plan and in light of the OPW and Local Authority being adjoining landholders, consultation has already commenced with both parties in respect of the proposed development of this new urban quarter, in order to ensure the appropriate development of the lands and the facilitation of public realm improvements in the surrounding area.

There are clear benefits associated with this approach as it will ensure that design solutions to integrate the new quarter into the existing town are identified. However, as proposers of the Masterplan are not the owners of the entirety of the Masterplan area and in view of the scale of the area involved and likely timeframe for development, it is critical that that Planning Authority treat any Masterplan as broad guidance for development rather than an inflexible plan for the area. It must also be recognised that our Clients will not be in a position to secure the delivery of development outside of lands in their ownership as they cannot compel other parties to facilitate development, now will the proposed development of their greenfield lands support significant infrastructure unrelated to the subject developments.

The wording relating to the *Proposed Trim Amendment No. 8* notes that a ‘description’ should be inserted into ‘Section 16.0 Masterplans’ of the Trim Written Statement (Volume No. 2 of the County Development Plan). However, Section 16 of the *Draft County Development Plan* does not appear to have been updated at Material Amendment stage to provide the relevant wording.

***Recommended Amendments Arising From Proposed Trim Amendments No. 8 (FTF NOM 42)***

We recommend that the wording of the description associated with this Masterplan (MP31) to be incorporated into Section 16.0 of the Trim Written Statement section of the Development Plan should note the following:

*“The Masterplan relates to the development of Mixed use, Residential, Open Space and Town Centre lands located to the west of the town centre, including the OPW site, the area incorporates both greenfield lands and existing buildings and uses. The Masterplan should not preclude the development of identified future road infrastructure connections, but should only provide for the infrastructure within the Masterplan lands required to serve the Masterplan lands.”*

This wording would ensure that the Masterplan, which has already been commenced, can be finalised quickly and that the development of the lands can commence, subject to planning, without undue delays.

To ensure consistency, it would also be necessary to alter the wording of Objective RT3 which requires the completion of a section of the distributor road prior to the provision of any development on the town centre expansion lands. It is submitted that this Objective should be removed in its entirety as this section of the road is not required in order to access or service the subject lands and this policy will only serve to prevent or significantly delay the development of these strategically important lands.

O’Connor Sutton Cronin Consulting Engineers have been retained in order to review the appropriateness of the road objective in the context of the development of Site A. This letter is attached as Appendix B to this Submission and should be consulted for a detailed overview of the issues raised.

The pertinent points as set out by OCSC Consulting Engineers are set out below:

- The indicative route of Objective RT3 is located on lands outside of our Client's ownership and outside the Masterplan 31 boundary and therefore the delivery of the road will be outside of the control of our Client and other Masterplan landowners.
- The vast majority of traffic travelling to and from the Masterplan lands will not utilise the RT3 route given it would add c.2km to the journey time from the dominant residential and commercial areas of the town.
- The estimated cost of construction for the RT3 route is €10 million. Objective RT3 requires that no development on the town centre expansion lands be provided until the road is completed. This results in a significant upfront cost which would likely render any development proposal unviable. This is a particularly onerous requirement given that the RT3 route is not required in order to access or service the subject lands.
- The provision of an isolated section of the overall circuitous distributor road would be premature given that the longer-term objective would be for this section of the road to connect to a bridge over the River Boyne. In the absence of a confirmed design for the future bridge, it is likely that significant relocation or reconstruction of the RT3 road would be required in the future.

We would also note that the development of the subject site would not preclude the later development of the distributor road given that it is located on separate lands and the Masterplan can facilitate future road connections.

Given the above significant issues which would arise should Objective RT3 be retained in the *Meath County Development Plan 2020 – 2026*, it is submitted that the objective should be removed in its entirety. An objective for the review of the design and delivery of the overall distributor road should remain within the Plan. Should the construction of the distributor road be found to be viable and required for the benefit of the town, and permission is obtained for same, the funding of the road could then be secured through another mechanism such as the implementation of a S.49 Supplementary Development Contribution Scheme that would apply to the areas demonstrated to benefit from same, which is likely to be the entire Town.



### **3.0 CONCLUSION**

In summary, the proposed Material Alterations are welcomed but the adoption of the above recommendations will contribute to the timely delivery of new commercial and residential development within Trim and will support the continued vibrancy and vitality of the Town into the future.

I would be grateful to receive a formal acknowledgement of this submission in due course. If any queries arise in relation to this matter, please do not hesitate to contact the undersigned directly at this office.

Yours faithfully


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**Julie Costello**  
**Associate**  
**Tom Phillips + Associates**

Encl.

## Appendix A

### Material Amendments to Draft County Development Plan

|  |  |
|--|--|
| <b>Amendment No.:</b>  | <b>Proposed Trim Amendment No. 4</b>                                       |
| <b>Submission/ NOM/ (FTF) NOM Numbers</b>  | MH-C5-652<br><i>Tom Phillips &amp; Associates on behalf of Leanort ULC</i> |
| <b>Chapter/Section</b>   |  |
| <b>Proposed Material Amendment</b>   |  |
| Amend the zoning of the B1 Town Centre to C1 Mixed Use.  |  |
|  <p><b>Proposed amended Zoning – from B1 to C1</b></p>  |  |
| <p><b>SEA Consultant Comments</b></p> <p>Potential environmental effects identified on Natura Sites (refer to AA Assessment).</p> <p>SEA Mitigation Recommendation: Provide for minimum 25m open space zoning / no development area between the boundary of the SAC and development zoning / development area.</p> |  |

|   |  |
|---|--|
| <b>Amendment No.:</b>   | <b>Proposed Trim Amendment No. 8</b>   |
| <b>Submission/ NOM/ (FTF) NOM Numbers</b>   | <i>(FTF) NOM 42</i><br><i>Cllr Fox</i> |
| <b>Chapter/Section</b>  |  |
| <b>Proposed Material Amendment</b>  |  |
| <p>Insert description into Section 16.0 Master Plans contained in the Trim Written Statement and insert Masterplan boundary around the lands</p>  |  |
|    |  |
| <b>Proposed zoning map showing new MP boundary</b>  |  |
| <p><b>SEA Consultant Comments</b></p> <p>Potential environmental effects identified on Natura Sites (refer to AA Assessment).</p> <p>SEA Mitigation Recommendation: Provide for minimum 25m open space zoning / no development area between the boundary of the SAC and development zoning / development area.</p> <p>Development remains subject to a masterplan, which will be subject to screening for SEA and AA.</p> |  |



## **Appendix B**

**Letter regarding Trim Objective 14 – RT3 (Prepared by O’Connor Sutton Cronin Consulting Engineers)**

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

6<sup>th</sup> March 2020

T-PR

PROJECT NO. L309



**RE: PROPOSED DRAFT MEATH DEVELOPMENT PLAN 2020-2026 – TRIM OBJECTIVE 14 – RT3**

Dear Sir/Madam,

OCSC have prepared this letter, on behalf of Leanort ULC, in response to the Draft Meath County Development Plan 2020-2026 which has recently been published for public consultation. Meath County Council considers the Development Plan has a critical role to play in planning for the future needs of the existing population of Trim Town and the rapid expansion of the urban centre. There are a number of key challenges that need to be addressed for Trim to reach its full potential i.e. reinforcing the town centre as the core of commercial, social and community activity in Trim through the re-use of existing underutilised or vacant buildings, promoting appropriate infill and backland development and setting out a clear development vision providing for the town centre's expansion which will address the retail leakage from the town and endorse the sub-county role of Trim within the County.

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This submission is made in the context of the Town Centre Expansion Lands as set out in the current Trim Local Area Plan (LAP) 2014 – 2020.



**Figure 1: Town Centre Expansion Lands – Site Location Map**



Civil | Structural | Mechanical | Electrical | Sustainability | Environmental

O'Connor Sutton Cronin & Associates Limited – Registered in Ireland No. 138329

Directors: Tony Horan (MD) | James Barrett (Secretary) | Paul Healy | Brian Madden | Martin McGrath | Francis McNulty | John Millar | Andrew O'Brien | Michael O'Reilly | Brian O'Rourke

Associate Directors: Shaun Doody | Brian Heron | Eddie Lyons | Anthony Horan | Paul McSteen

Associates: Derek Connolly | Ian Crehan | Paul Devine | Vernon McAllorum | Niall McMenamin | Pat Moynihan | Dan O'Keeffe | Patrick Raggett

Administrative Associate: Carrie Poettcker

Dublin | Belfast | Birmingham | Cork | Galway | London

The convenience and connectivity of the lands to the existing town centre and road network mean they are critical to achieving the aforementioned aims and with careful consideration of the objectives and strategies this can be encouraged. A masterplan layout to facilitate the delivery of a mixed use scheme has been developed by Mola Architecture which highlight multiple connections to the existing road network including to Jonathan Swift Road and the R161, allowing for through connectivity between the two in line with the current Trim LAP.



Following on from the above, this submission relates to the proposed objective set out within the Draft County Plan which allows for the delivery of a local distributor road around Trim and its interaction and potential impact on the successful delivery of the Town Centre Expansion.

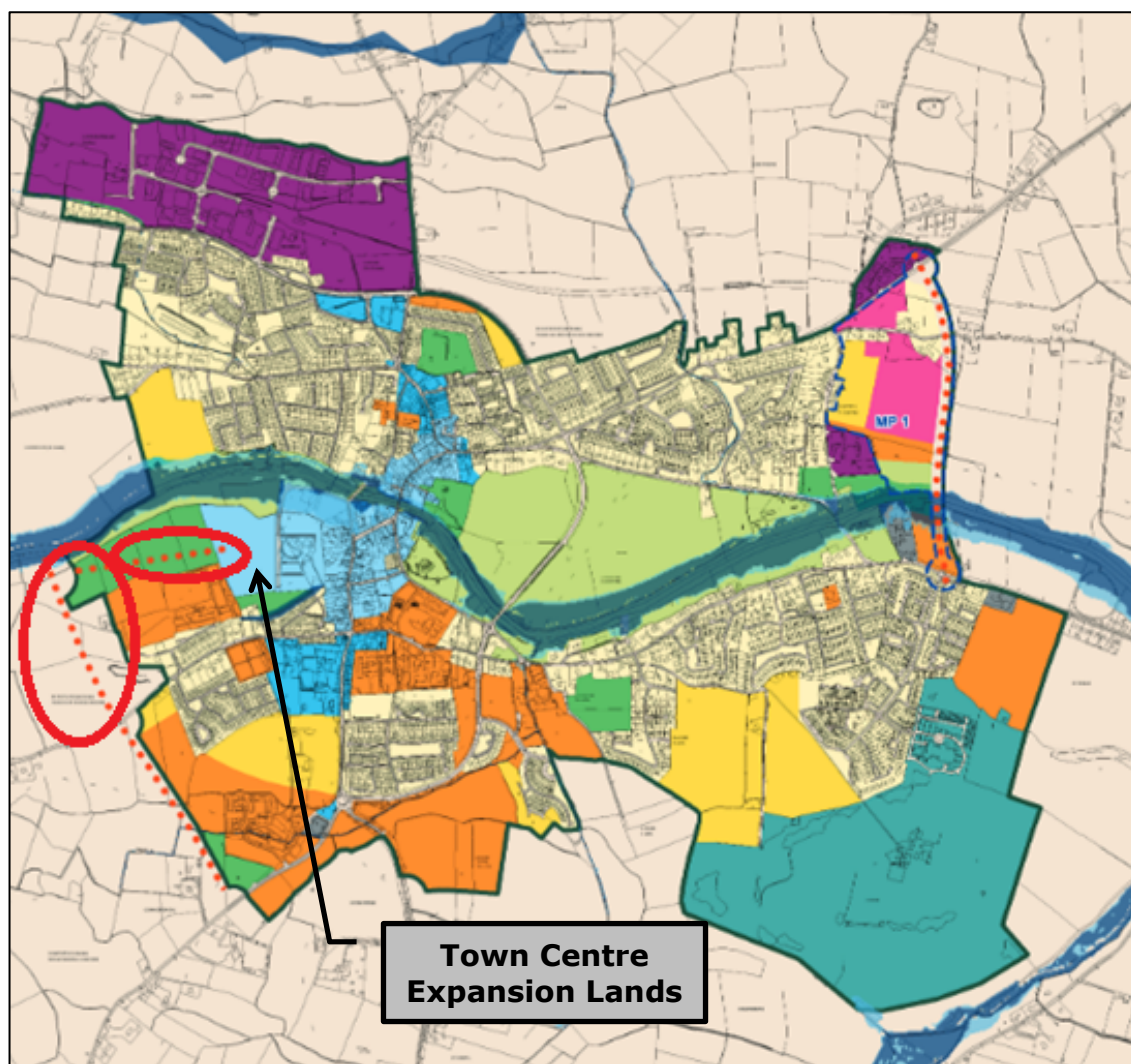
The particular proposed objective is set out in the Draft Volume 2 – Written Statement and Maps for Settlements – Trim and states the following:

*“TRM OBJ 14 – RT 3: Construction of the local distributor road link west of the Town Centre Expansion area connecting to the Kinnegad Road. This shall be provided in tandem with the development immediately to the east. No development shall be provided on the lands immediately to the east until such time as this section of the distributor road is completed. This road should be funded by the development in the town centre expansion”*

The above forms part of an overall objective for the delivery of the aforementioned distributor road in sections as covered by RT 1 – RT 5 of the proposed TRM OBJ 14. However, it is noted that only the sections of this road relating to RT1, RT3 and RT4 are included on Sheet No: 38 (a) Land Use Zoning (Trim) of the Draft Plan. Sections RT 2 and RT 5 are omitted from this map, with the former specifically noted as a “long term objective”.

While the provision of the distributor road is considered to be a good long term core strategy, it appears that the proposal included in the current draft directly links the funding and delivery of the road element described in RT 3 to the Town Centre Expansion development. This significant burden is likely to detract from the potential development on the basis that the roads element associated with the masterplan development combined with that set out in RT 3 will constitute a preliminary costing estimated to be in excess of €10 million. This is obviously a significant additional cost with respect to the realisation of the Town Centre Expansion which would severely impact the development potential and may result in considerable and/or indefinite delay to its realisation.

Any such construction would also occur on lands outside of the developers control and involve resolution of a considerable number of complex, potentially costly and time consuming elements including significant land acquisition and realignment of the R161 to facilitate a new junction.



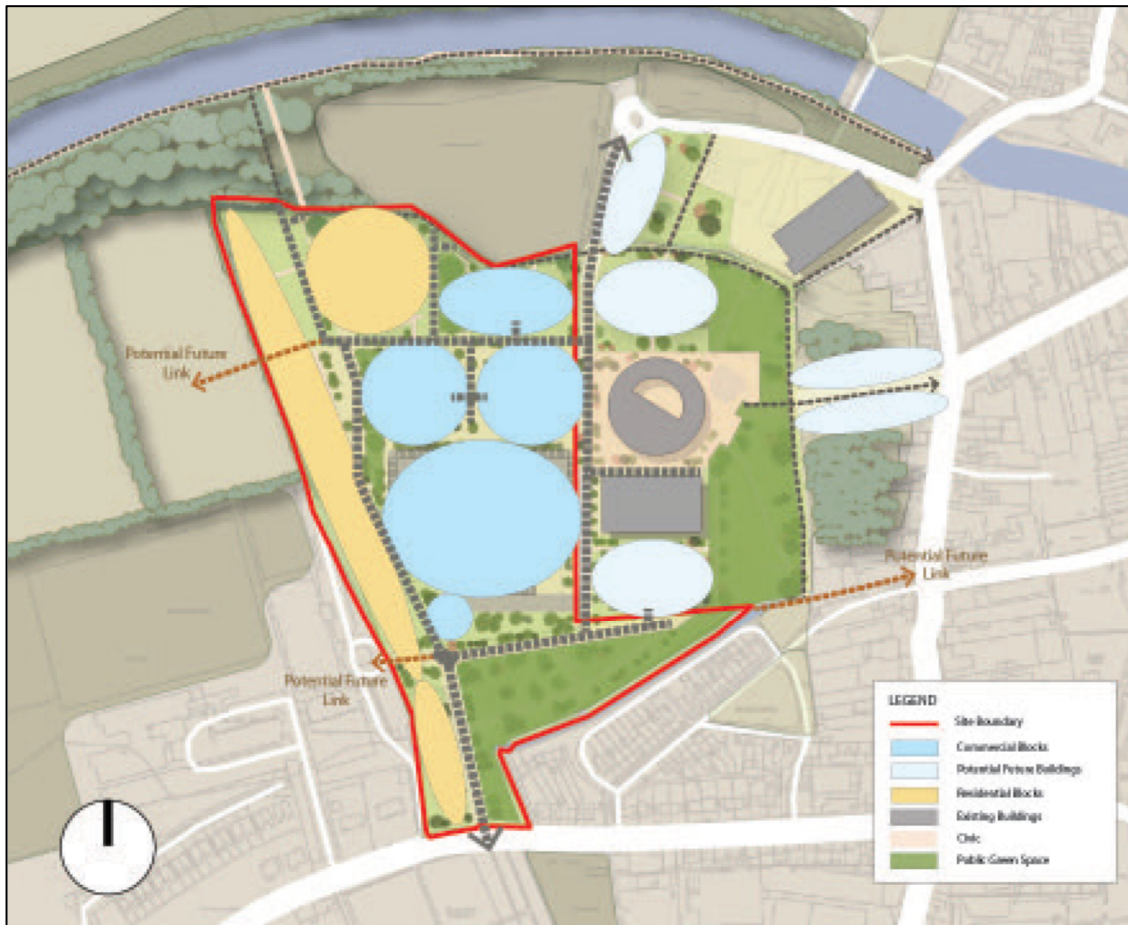
*Figure 2: Road Element Relating to TRM OBJ 14 – RT 3*

The Town Centre Expansion Lands are located close to the western extremity of Trim and the majority of activity expected to be associated with the masterplan development is to and from the existing and future development of Trim itself. When considering this in the context of the existing layout of Trim combined with the proposed zoning of the town in the Draft Plan, as shown above, it is apparent that the vast majority of residential and commercial lands which are expected to interact with the Town Centre Expansion are located to the east and south east or to the north across the River Boyne. As a result, the vast majority of traffic travelling to and from the masterplan lands will not utilise the road infrastructure set out in RT 3. Indeed, the route of the RT 3 road element and its indicative connection to the masterplan lands would add an additional 2 km from the dominant residential and commercial areas of the town which highlights how unattractive an access option it would be for the vast majority of traffic

This is further compounded by the acknowledgement the road element associated with RT 2 in the Draft Plan is a long term objective which will require considerable consultation with national bodies to ultimately realise. This is particularly relevant as the RT 2 road element is defined as connecting the Athboy Road to the local distributor road west of the Town Centre Expansion area (RT

3), including a new bridge over the River Boyne which adds a significant degree of complexity to the delivery of the overall distributor road. This also further isolates the proposed RT 3 infrastructure as it will have no connectivity to the northern portion of Trim which consequently significantly limits any potential benefit of the RT 3 road element in terms of traffic and transportation.

Thus, taking the above into consideration, it is clear that the RT 3 road element is not required to facilitate the development of the masterplan lands and potential access points that will serve them on Jonathan Swift Road and the R161, as shown in the indicative layout below.



*Figure 3: Indicative Masterplan Layout*

In addition to the above, the provision of an isolated section of the distributor road on a long term basis could potentially act as a “rat-run” for R161 traffic to avoid lights at Emmett Street at peak times and result in unnecessary additional traffic in the town centre and through the masterplan lands to the detriment of the development, which offers considerable benefit to Trim and would be considered to be against the principles of national guidance including the Design Manual for Urban Roads and Streets given the mixed use nature of the masterplan and the expected designation and role of the associated roads.

Furthermore, it appears that the construction of the proposed isolated section of road set out in RT 3 would be premature and will only generate potential hard standing areas with limited benefit in terms of traffic given the aforementioned

issues with respect to likely travel patterns. This can be observed from the extract previous where the proposed section of road can only be accessed from the most westerly point of the town on the R161 with no access from the north, where the River Boyne presents a physical barrier.



Quite apart from this, the nature of the long term function of this route will require a cross section template much in excess of what will be required in the interim. Indeed, the delivery of any portion of this route could only be implemented if a complete design was in place for the full link from the Athboy Road to the Longwood Road (RT 2) which is noted as a long term objective due to the acknowledged difficulties regarding its delivery, in particular the proposed bridge. To undertake the RT 3 road element in isolation would likely result in future abortive work since the design of the future bridge over the River Boyne in particular would need to be clearly understood to ensure a workable design with compliant gradients and bridge construction techniques are allowed for. Were these considerations not fully evaluated and understood, the level of the potential link back to the subject site could well have to be re-evaluated for its ability to serve the lands it is designed for which could even lead to relocation/reconstruction of significant elements of the RT 3 road element.

In summary, while the delivery of the distributor road is considered to represent an overall benefit to Trim, the sectioning of the road and linking to the development of specific lands in isolation is likely to have significant negative impact in terms of development potential while simultaneously providing little benefit from a transportation benefit. With respect to the Town Centre Expansion lands, the delivery of the proposed TRM OBJ 14 – RT 3 road element presents considerable challenges with respect to associated costs, land ownership, design co-ordination with long term objectives which are effectively unknown with respect to the required detail etc. As a result, prohibiting the development of these lands until the road element is delivered, despite it offering no real benefit in isolation from the overall distributor road, is likely to have a detrimental impact on the realisation of the Town Centre Expansion which in turn will have an overall negative impact on the development potential of Trim.

Thus, in taking the aforementioned issues into consideration, the linking of both the cost and delivery of the RT 3 road element to the masterplan lands would be prohibitive on the developers of the Town Centre Extension which could significantly delay or prevent its delivery. As a result, it is suggested that the objective be removed accordingly to prevent an unnecessary burden on the masterplan delivery and that the delivery of this and similar infrastructure would be more appropriately funded by an alternative mechanism such as a Section 49 Supplementary development contribution scheme.

Yours sincerely

Patrick Raggett  
Chartered Civil Engineer  
For O'Connor Sutton Cronin