

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

29th June 2021

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

Dear Sir/Madam,

The National Transport Authority ('the NTA') has reviewed the Material Amendments to the *Draft Meath County Development Plan 2021-2027* and, on the basis of the *Transport Strategy for the Greater Dublin Area 2016-2035* ('the Transport Strategy'), submits the following observations and recommendations.

1. Leinster Orbital Route

Proposed Amendment Chapter 5.18 relates to the Leinster (Outer) Orbital Route. The Leinster Orbital Route (LOR) is included in the Transport Strategy as a national road scheme, which recommends the finalisation of the route corridor and its protection from development intrusion.

The proposed amendment provides revised text for two related objectives, viz.:

- MOV POL 23 – To support the ~~reservation of the indicative route~~ delivery of the Leinster Outer Orbital Route, which is considered to comprise important infrastructural development, **and when finalised, to protect the route corridor** free of developments which could interfere with the provision of the project.
- MOV OBJ 33 – **When finalised and agreed**, to reserve the **route corridor** ~~the indicative route~~ of the Leinster Outer Orbital Route free of developments which could **otherwise** interfere with the provision of the project.

As proposed, the protection described in the two objectives would follow the finalisation of the route selection process and would apply to the finalised route only. However, the Section 28 Ministerial Guidelines *Spatial Planning and National Roads Guidelines for Planning Authorities* (DoECLG, 2012) recommend that development objectives must not compromise the *route selection process* for road scheme planning (Section 2.9). The NTA therefore submits that the two revised objectives, which relate to the finalised route only, are not in accordance with the S.28 Ministerial Guidelines. It is recommended that these objectives should be further revised to refer to the need to preserve and protect route options pending a finalised design.

‘Proposed Trim Amendment No.6’ relates to the zoning of additional lands on the R154 Dublin Road as ‘G1 Community Infrastructure’ and ‘D1 Tourism’. These lands are within a Junction Protection Zone for the LOR, as identified in the *Leinster Orbital Route Corridor Protection Study (2009)*. In light of the provisions of the S.28 Ministerial Guidelines set out above, the NTA submits that the proposed zoning of these lands requires further consideration to ensure that the zoning objectives do not conflict with the planning, design and delivery of the LOR.

Recommendations

The NTA recommends that the two objectives included above should be further revised and submits the following proposals for consideration:

- MOV POL 23 – To support the delivery of the Leinster Orbital Route, which is considered to comprise important infrastructural development, and to protect route corridor and corridor options free of developments which could interfere with the provision of the project.
- MOV OBJ 33 –To reserve route corridor and corridor options of the Leinster Orbital Route free of developments which could otherwise interfere with the provision of the project.

The NTA also recommends that the zoning of the lands which are the subject of Proposed Trim Amendment No.6 requires further consideration, to ensure that the proposal accords with the provisions of the S.28 Ministerial Guidelines and does not compromise the planning, design and delivery of the Leinster Orbital Route.

2. Navan Rail Line

A number of amendments are proposed related to Phase II of the Navan Rail Line, i.e. the extension of the line from its current terminus at Dunboyne/Pace to Navan and potentially a spur from Dunshaughlin to Ashbourne and Ratoath. The NTA notes the following proposed amendments:

- Proposed Amendment Chapter 3.5: The deletion of Settlement and Housing objective SH OBJ 12 – To support the preparation of a feasibility study exploring the potential of a future rail spur off the Navan-Dublin Rail line from Dunshaughlin to serve Ashbourne and Ratoath;
- Proposed Amendment Chapter 4.3: The revision of Economic Strategy objective ED OBJ 24 as follows:
 - To ~~implement the extension~~ **support the reappraisal and thereafter, promote, facilitate and advance** of the Dunboyne/M3 Parkway rail line to Navan during the Midterm review of the Regional Spatial and Economic Strategy, in accordance with Table 8.2 of the Regional Spatial and Economic Strategy;

- Proposed Amendment Chapter 4.4: The deletion of Economic Strategy objective ED OBJ 39 – To explore in conjunction with Irish Rail and other stakeholders the feasibility of a future rail spur off the Navan-Dublin Rail line from Dunshaughlin to serve Ashbourne and Ratoath; and
- Proposed Amendment Chapter 5.10: An update of objective MOV OBJ 3 in Section 5.7.1 Rail as follows:
 - a) To protect and safeguard the detailed designed alignment of Phase II of the Navan rail route and surrounding lands (including identified station locations), as illustrated on Map Series No. 5.1 in Volume 4, free from development and any encroachment by inappropriate uses which could compromise its future development as a rail facility, **prior to the reappraisal of the project as part of Mid Term Review of the GDA Transport Strategy in accordance with the precepts of the RSES.**
 - b) ~~To explore in conjunction with Irish Rail and other stakeholders the feasibility of a future rail spur off the Navan-Dublin Rail line from Dunshaughlin to serve Ashbourne and Ratoath.~~ **As part of the future planning of the Dunboyne/M3 Parkway line to Navan, the possibility of a spur serving Ashbourne and Ratoath should be explored subject to compliance with national policy and the Railway Order.**

In addition to the amendments noted above, the most substantial amendment related to the Navan Rail Line is presented in Proposed Amendment Chapter 5.9, which proposes a revised text for Section 5.7.1 and to include the following revised policies:

It is the policy of the Council:

- MOV POL 5: To support the extension of the rail network in the County and to actively and strongly pursue a rail line from Dunboyne/M3 Parkway to Navan subject to proper planning and environmental considerations.
- MOV POL 6: To actively pursue, in conjunction with Irish Rail and the NTA, the re-appraisal of the extension of the Dunboyne/M3 Parkway line to Navan during the Mid-Term review of the GDA Transport Strategy in accordance with the precepts of the RSES.
- MOV POL 7: To support the reappraisal and thereafter, promote, facilitate and advance the Dunboyne /M3 Parkway line to Navan railway line project and associated rail services in cooperation with other relevant agencies.

As noted, the appraisal of this rail line is a matter for the NTA to determine through the review of the Transport Strategy that is currently underway. The NTA welcomes the commitment from the Council to ‘actively participate in this appraisal to ensure the assessment is rigorous in its consideration of all relevant matters pertaining to the County’s need for a rail line’. The appraisal commenced in February 2021 as part of the Strategy process and has included liaison with the Council in this regard.

The NTA is also supportive of the inclusion in the Plan ‘of a specific zoning objective R1 Rail Corridor which seeks “to provide for a strategic rail corridor and associated physical infrastructure”’, and welcomes the Council’s support for ‘the completion of a route option study to confirm the most optimal route, once the principal [sic] of the rail line has been established’.

Recommendation

The NTA is supportive of the inclusion of the three policies proposed above (MOV POL 5, 6 and 7) in the Plan.

3. Local Area Planning

In its submission to the Council on the Draft Development Plan, the NTA recommended that Local Transport Plans (LTPs) should be prepared for all settlements for which an LAP would be undertaken. The Draft Plan stated that LAPs would be prepared for all settlements at the Small Town scale and above. The NTA also recommended that LTP preparation should follow the process set out in the *Area Based Transport Assessment (ABTA)* guidance issued by TII and the NTA in 2018.

The NTA welcomes the inclusion of a reference to ABTA in the amended objective MOV OBJ 1, which now states: 'To prepare and commence implementation of, Local Transport Plans (LTP), in conjunction with the NTA and relevant stakeholders, for Drogheda (in conjunction with Louth County Council as part of the Joint Urban Plan), Ashbourne, Navan, Ratoath, other settlements where appropriate, **having regard to the Area Based Transport Assessment Guidance Notes (2019).**' However, the reference to 'other settlements as appropriate' does not explicitly relate to all settlements at Small Town scale and above, and the NTA recommends that MOV OBJ 1 should be further amended to include such reference.

The NTA is concerned at the reliance of the Draft Plan on the preparation of Masterplans for identified sites at a range of scales in urban areas. The DoECLG guidelines for planning authorities on *Sustainable Residential Development in Urban Areas* and *Local Area Plans* advise that non-statutory plans such as Masterplans can supplement or complement, but not replace, statutory plans, and recommend that the outputs of the master-planning process should be incorporated into the Development Plan or an LAP by way of variation. As proposed, the methodology for the preparation of masterplans and their status in the development management process has not been clearly set out in the Draft Plan, and the potential lack of an evidence-based, plan-led approach to the development of these areas, also including public and stakeholder consultation, is a matter of concern.

A number of Masterplans are proposed for areas that would be included in the revised MOV OBJ 1 proposed above, i.e. Small Towns and above, and the revised objective would address the concerns of the NTA in this regard. However, the remainder of the proposed Masterplan areas would not fall within the scope of the amended objective above. For these areas, the NTA recommends that the ABTA guidance should also be followed and that the resulting LTPs should be given statutory standing for the purposes of development management. Lastly, the NTA would reiterate the recommendation contained in its previous submission on the Draft Plan, that the development of larger sites within the subject settlements under a revised MOV OBJ 1 should be contingent on the completion of the LAP/LTP process.

Recommendations

The NTA recommends that:

- MOV OBJ 1 should be further amended by replacing the reference to 'other settlements as appropriate' with a reference to 'all settlements at Small Town scale and above';
- the Plan should include an objective regarding the use of the ABTA process in the preparation of Local Transport Plans for all areas for which a Masterplan is proposed in the Draft Plan, regardless of the scale of the settlement or its inclusion in the revised MOV OBJ 1 above; and
- the development of larger sites within the subject settlements under a revised MOV OBJ 1 should be contingent on the completion of the LAP/LTP process.

4. Zoning

The Material Amendments propose a number of new zonings or zoning amendments for settlements in the county. The position of the NTA in relation to these proposals, and other comments on zoning from the NTA's submission on the Draft Plan in 2020, are outlined below.

In its submission on the Draft Plan, the NTA set out 'Guiding principles informing the integration of land use planning and transport planning', which are included in Chapter 7 of the Transport Strategy. The overarching objective of these principles is to facilitate the use of sustainable transport modes for the majority of journeys by supporting compact urban growth and the location of trip-intensive developments on lands well served by public transport. These principles are reflected in the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Regions, in both the Guiding Principles on the Integration of Land Use and Transport, and the Tiered Approach to Land Use Zoning.

Maynooth:

In its submission on the Draft Plan, the NTA stated that 'lands in the Maynooth Environs have been designated for strategic employment use, based in part on a relationship with Maynooth University. However, these zoned lands are remote from the town of Maynooth and are not well served by sustainable transport.' The Material Amendments do not propose any revision of the subject zoning and the NTA reiterates its concerns regarding this zoning.

South Drogheda Environs:

Lands on the western edge of the South Drogheda Environs were zoned for strategic employment use in the Draft Plan. While these lands are contiguous with the existing built-up area, they are on the periphery of the town and are located in close proximity to the M1 motorway. In light of the critical requirement to protect the strategic transport function of national roads, including motorways, the NTA queried the zoning of these lands for strategic employment use in its submission on the Draft Plan. As this zoning has not been amended in the proposed Material Amendments, the NTA reiterates its concerns regarding this zoning.

Dunshaughlin:

Proposed Dunshaughlin Amendment no. 2 proposes a new zoning of E2 General Enterprise & Employment for a parcel of land to the west of the town adjacent to Junction 6 of the M3 motorway. The rationale for this zoning is not clear, and in light of the critical requirement to protect the strategic transport function of national roads, including motorways, the NTA would query the proposed zoning of these lands in the absence of a clear rationale for doing so.

Ashbourne:

Proposed Ashbourne Amendment no. 6 proposes to amend the zoning of lands from 'Future land use of these lands to be agreed as part of the Masterplan' to E1/E3 Employment and to designate them as the new Strategic Employment Site. However, the rationale for this zoning amendment has not been clearly set out and appears not to be evidence-based or plan-led, as required by The DoECLG *Spatial Planning and National Roads Guidelines*. In addition, it is intended to prepare a Masterplan for these lands. The NTA submits that further consideration of this zoning amendment is required in light of the provisions of the S.28 Ministerial Guidelines, given the proximity of the lands to Junction 3 of the M2, and recommends that the zoning should be informed by a fuller Transport Assessment guided by the ABTA process.

Recommendations

The NTA recommends that the zonings discussed above, both proposed zoning amendments and zonings proposed in the original Draft Plan, would merit further consideration in light of the Ministerial Guidelines on Spatial Planning and National Roads and the NTA's Transport Strategy, specifically Section 7.1.2 Principles of Land Use and Transport Integration, a summary of which was provided in the NTA submission on the Draft Plan.

The NTA also recommends that the use of Masterplans requires further consideration, as set out above in this submission under Section 3 – Local Area Planning. The NTA supports an evidence-based, plan-led approach to the development of all sites identified for Masterplan preparation, as such an approach involves consultation with key stakeholders and the use of the ABTA methodology, and would assist in the development management process when determining applications on such sites.

5. Park & Ride

The NTA acknowledges the amendment of MOV POL 13 in Section 5.7.3 as follows:

- To promote and support the provision of Park-and-Ride facilities **in the preparation of Local Transport Plans, in consultation with the Park & Ride Development Office**, which improve public transport accessibility without exacerbating road congestion, ~~or which cause increased car travel distances~~, at appropriate locations within the County.

However, in the interests of clarity, the NTA submits the following alternative wording for consideration:

- To promote and support the provision of Park-and-Ride facilities which improve public transport accessibility without exacerbating road congestion at appropriate locations within the County, in accordance with the recommendations of the Park & Ride Development Office of the NTA.

6. NTA Publications

As noted above, the *Transport Strategy for the Greater Dublin Area* is currently being reviewed. The *Greater Dublin Area Cycle Network Plan*, which was published in 2013, is also being reviewed as part of the Transport Strategy preparation. In addition, the *National Cycle Manual (NCM)*, which sets out guidance on the design of cycle infrastructure and cycle-friendly urban areas, is currently being updated to reflect current best practice.

Regarding the NCM, the NTA supports the new objective proposed for inclusion in Section 5.7.6 Cycling & Walking, viz.:

MOV OBJ XX- 'To ensure that design for cycle infrastructure for all relevant developments shall be carried out in accordance with the NTA Cycle Manual.'

More generally, the NTA recommends that the Draft Plan should take cognisance of the fact that the documents listed above are currently being reviewed and revised, and references to these documents in the Plan should acknowledge this by the insertion of a clause that states e.g. 'The Greater Dublin Area Cycle Network Plan (2013) **or any successor to this document**' where appropriate.

Recommendation

The NTA recommends that references to NTA publications that are currently being reviewed and updated should refer to both the current documents and to their successors, as appropriate.

I trust that the views of the NTA will be taken into consideration in the finalisation of the Meath County Development Plan 2021-2027.

Yours sincerely,



Michael MacAree
Head of Strategic Planning