



Proposed Variation No. 3 of the Meath County Development Plan 2021-2027

The Eastern and Midland Regional Assembly notes the publication of proposed variation No. 3 of the Meath County Development Plan 2021-2027 and sets out hereunder observations on behalf of the Assembly. The submission has been prepared by the executive and approved by the members of the Eastern and Midland Regional Assembly (EMRA) at the meeting on 8th November 2024.

1.0 Regional Spatial and Economic Strategy (RSES)

The Council will be aware of the finalisation of the Regional Spatial and Economic Strategy for the Eastern and Midland Region which was made on 28th June 2019. In line with the provisions of the Planning and Development Act 2000, as amended, the planning authority shall ensure, when making a variation to the development plan, that it is consistent with the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region, thus ensuring full alignment between local, regional and national planning policy. In this regard, the Regional Assembly welcomes the proposed variation to the Development Plan.

2.0 Legislative Context

The role and function of the Regional Assembly, including the scope of the RSES, is provided for in the Planning and Development Act 2000 (as amended). It should be noted that this legislation is currently under review, with the new Planning and Development Bill 2023 approved by Cabinet on 3rd October 2023 and published by the Department of Housing, Local Government and Heritage on 21st November 2023, with an amended Bill, approved by both Houses of the Oireachtas on the 9th of October 2024 and signed into law by the President on the 17th of October 2024. It is anticipated that the Planning and Development Bill 2023 will be enacted into legislation in the coming months.

Under Section 27C of the Planning and Development Act 2000, as amended, the Eastern and Midland Regional Assembly, is obliged to prepare submissions/ observations to be submitted to the relevant planning authority and copied to the Office of the Planning Regulator.

A submission shall contain a report which shall state whether, in the opinion of the Regional Assembly, the draft variation of the development plan, and its core strategy, is consistent with the Regional Spatial and Economic Strategy. If, in the opinion of the Regional Assembly the proposed draft variation of the development plan and its core strategy is not consistent with the RSES, the submission / observations and report shall include recommendations as to what amendments, in the opinion of the Regional Assembly, are required to ensure that it is consistent.

This report contains the opinion of the Eastern and Midland Regional Assembly in relation to the above matter along with recommendations as required under Section 27C of the Planning and Development Act 2000 as amended.

3.0 Proposed Variation No. 3

Meath County Council has published proposed Variation No. 3 seeking to vary the Meath County Development Plan (CDP) 2021-2027.

The proposed variation incorporates 3 no. amendments summarised below:

- (1) Proposed Amendment 1: To update the CDP to take account of the Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities 2024.
- (2) Proposed Amendment 2: To update the CDP to include up to date policy relating to Age Friendly Housing.
- (3) Proposed Amendment 3: Provide for a percentage range for the quantum of residential uses permitted on Town Centre and Mixed-Use land use zonings.

3.1 Proposed Variation

A variation document has been published as part of the proposed variation which sets out the proposed amendments to the text in Volume 1 (written statement) of the Meath CDP 2021-2027.

The report published as part of the proposed variation outlines all proposed amendments to the text of the Meath County Development Plan 2021-2027 with proposed new text highlighted in blue and proposed deletion text by strikethrough.

Table 1 of the proposed variation outlines all sections/tables/policies/objectives in the County Development Plan that are proposed to be amended as part of the proposed variation. These include amendments to Chapter 3 (Settlement and Housing Strategy), Chapter 7 (Community Building Strategy) and Chapter 11 (Development Management Standards and Land Use Zoning Objectives). The content of the proposed amendments listed in Table 1 of the proposed variation are noted by the Assembly.

Proposed Amendment No. 1

The proposed variation report outlines the proposed amendments to Chapters 3, 7, and 11 of the Meath CDP 2021-2027 to update the Development Plan to take account of the ***'Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities'*** published by the Department of Housing, Local Government and Heritage in January 2024 and issued under Section 28 of the Planning and Development Act 2000, as amended. Section 28 provides that planning authorities shall have regard to Ministerial Guidelines and shall apply any specific planning policy requirements (SPPRs) of the Guidelines, within the meaning of Section 28 (1C) of the Planning and Development Act 2000, as amended, in the performance of their functions.

It is also noted that the proposed text of the variation proposed to update parts of the CDP to include reference to the ***'Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for***

Planning Authorities' published by the Department of Housing, Local Government and Heritage in July 2023.

The various sections that have been updated to reflect same are listed below;

Chapter 3	Settlement and Housing Strategy
Section 3.8.2.1	Legislation changes and Policy Initiatives
Section 3.8.9	Design Criteria for Residential Development
Section 3.8.10	Densities

Chapter 7	Community Building Strategy
Section 7.7	Social Infrastructure
Section 7.7.7	Open Space

Chapter 11	Development Management Standards and Land Use Zoning Objectives
Section 11.1.2	Policy Context
Section 11.5.2	Urban Design
Section 11.5.3	Density
Section 11.5.7	Separation Distances
Section 11.5.11	Public Open Space
Section 11.5.12	Private Open Space
Section 11.5.16	Light and Overshadowing
Section 11.5.17	Apartments
Section 11.9.1	Parking Standards
Section 11.9.3	Cycling Parking

Proposed Amendment No. 2

The proposed variation report outlines the proposed amendments to Chapters 3, 7 and 11 to reflect up to date policy at national and local levels in relation to Age Friendly Housing. The variation report states that the proposed amendment takes into consideration the actions outlined in the policy statement entitled "Housing Options for Our Ageing Population" prepared by the Department of Housing, Planning and Local Government and the Department of Health (2019), Section 6.4 entitled "Age Friendly Communities" of the National Planning Framework (Project Ireland 2040) and Housing Policy Objective 6: Increase and improve housing options for Older People within "Housing for All, A New Housing Plan for Ireland" prepared by the Department of Housing, Planning and Local Government (2021).

The various sections that have been updated to reflect same are listed below;

Chapter 3	Settlement and Housing Strategy
Section 3.3.2	Age Profile
Section 3.8.8	Housing for Older People
Section 3.8.9	Design Criteria for Residential Development

Chapter 7	Community Building Strategy
Section 7.6.2.2	Older People

Chapter 11	Development Management Standards and Land Use Zoning Objectives
Section 11.1.2	Policy Context
Section 11.4.2	Access for All
Section 11.5.2	Urban Design
Section 11.7.2	Sheltered Accommodation/ Step Down Housing, Residential Care Homes, Retirement Homes, Nursing Homes, Retirement Villages.
Section 11.9.1	Parking Standards

Proposed Amendment No. 3

The proposed variation report outlines the proposed amendments to Chapter 11 to allow for percentage range for quantum of residential uses permitted on Town Centre/Mixed Use zoning.

The proposed variation report states that ‘Town Centre First policy aims to create town centres that function as viable, vibrant and attractive locations for people to live, work and visit, while also functioning as the service, social, cultural and recreational hub for the local community. Leading on from this, we need to consider how we can encourage increased residential occupancy in our towns and villages. More people living in town centres means more support for local businesses. It means a safer environment, thanks to passive policing. In this regard, it is considered that greater flexibility should be built into the quantum of residential uses permitted on both town centre and mixed use zoned lands. In this way, each application can be assessed on a case by case basis with greater flexibility in relation to the quantum of residential uses relevant to the site’s location and context.’

The section that is proposed to be updated to reflect same is listed below;

Chapter 11	Settlement and Housing Strategy
Section 11.14.6	Development Management Standards and Land Use Zoning Objectives

B1 Commercial/Town or Village Centre

Objective: To protect, provide for and/or improve town and village centre facilities and uses

Guidance

The primary land use in B1 zones is employment generating, service and retail provision. In order to achieve balanced development and create vibrant urban communities, residential use can also be considered on these lands. In order to ensure the delivery of commercial uses commensurate with the status of the settlement **while also encouraging increased residential occupancy within our towns, the percentage of residential development in B1 zones shall generally fall within the range of not exceed 30%-50%** of the quantum of a development site in any development proposal in Key Towns, Self-sustaining Growth Towns, Self-sustaining Towns. Exceptions may be facilitated on a case by case basis where a clear evidence base has been demonstrated.

C1 Mixed Use

Objective: To provide for and facilitate mixed residential and employment generating uses

Guidance

Lands identified for mixed use development are only appropriate in higher tier settlements. The objective on these lands is to provide opportunities for high-density mixed-use employment generating activities that also accommodate appropriate levels of residential development thereby facilitating the creation of functional 'live work' communities. These areas are generally located in proximity to high frequency public transport corridors. In order to achieve balanced development, the percentage of residential development in C1 zones shall generally **fall within the range of not exceed 50%-70%** of the quantum of a development site. **Exceptions may be facilitated on a case by case basis where a clear evidence base has been demonstrated.**

4.0 Submission

The Regional Assembly acknowledges proposed Variation No. 3 of the Meath County Development Plan 2021-2027 which seeks to update the County Development Plan to incorporate 3 no. amendments as detailed in the proposed variation report and summarised in Section 3.0 of this submission.

The proposed variation amends text associated with Chapters 3, 7 and 11 of the Meath CDP 2021-2027 to allow for:

- Proposed Amendment 1: To update the CDP to take account of the Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities 2024.
- Proposed Amendment 2: To update the CDP to include up to date policy relating to Age Friendly Housing.
- Proposed Amendment 3: Provide for a percentage range for the quantum of residential uses permitted on Town Centre and Mixed Use land use zonings.

Amendment No.1

In relation to proposed Amendment No.1, the proposed variation will update the Meath CDP 2021-2027 whereby current references to the now revoked '*Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities (2009)*' will be omitted and replaced with the latest ministerial guidance for new residential development as set out in the '*Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities (2024)*'. Updated references to the '*Sustainable Urban Housing: Design Standards for New Apartments -Guidelines for Planning Authorities (2023)*' are also incorporated into this proposed amendment to the CDP. Arising from same, the proposed variation provides updates across a number of chapters within the County Development Plan where the previous guidelines are referenced including notable updates to development management standards to be applied for new residential developments in the county (e.g. housing densities, separation distances, public open space, private open space, parking standards, etc.).

It is considered that this proposed amendment is consistent with the RSES by bringing the content of the Meath CDP 2021-2027 into line with the updated Section 28 Guidelines issued in 2024 on this matter, and, in this regard, the Regional Assembly supports in principle the proposed amendment.

Amendment No. 2

In relation to Proposed Amendment No. 2, the proposed variation includes amendments to various sections of the CDP relating to Age Friendly Housing to take into consideration the actions outlined in the policy statement entitled "Housing Options for Our Ageing Population" prepared by the Department of Housing, Planning and Local Government and the Department of Health (2019), Section 6.4 entitled "Age Friendly Communities" of the National Planning Framework (Project Ireland 2040) and Housing Policy Objective 6: Increase and improve housing options for Older People within "Housing for All, A New Housing Plan for Ireland" prepared by the Department of Housing, Planning and Local Government (2021).

The Assembly notes that under proposed amendments to Section 3.8.8 (Housing for Older People), additional proposed text appears to be proposed with changes not marked in blue to distinguish what is currently in this section of the Meath CDP 2021-2027 and what is proposed to be changed which should be clarified.

For the most part in relation to Amendment No. 2, the Regional Assembly welcomes the update being provided as part of this proposed variation which will bring the Meath CDP 2021-2029 into consistency with current ministerial and national policy in relation to Age Friendly Housing.

Amendment No. 3

Regarding Proposed Amendment No. 3, the Regional Assembly notes the proposed amendments to provide for greater flexibility under Town Centre and Mixed-Use land use zoning objectives in the County Development Plan with the intention to allow for an increase in the quantum of residential uses permitted on both town centre and mixed use zoned lands. The planning authority indicates that

each application will be assessed on a case-by-case basis with greater flexibility in relation to the quantum of residential uses relevant to the site's location and context.

In relation to B1 Town Centre zoned lands, the proposed flexibility being put forward for residential uses on such zoned lands for new development sites would generally fall within the range of 30-50%. On C1 Mixed Use zoned lands, the percentage of residential development shall generally fall within the range of 50-70% of the quantum of a development site. The existing maximum limits of 30% on town centre zoned lands and 50% on mixed use zoned lands is proposed to be deleted.

Whilst the Assembly notes the intention of this proposed amendment, which is being proposed in the interest of revitalising town and village centres and providing for compact growth in urban centres (particularly on brownfield sites), there is a lack of explanation provided for in the proposed variation for the new ranges being sought, with the range of up to 70% residential on mixed use zoned lands particularly notable (The C1 Mixed Use zoning being used in the higher tier settlements in the county).

This up to 70% range does not appear to be supported in the Sustainable Residential Development and Compact Settlement Guidelines (2024) or the Government's Town Centre First Policy (2022) and should be suitably justified by the proposed variation in order to avoid situations of overdominance of residential development in a town centre commercial area. It should be noted that both the Sustainable Residential Development and Compact Settlement Guidelines (2024) and the Regional Spatial and Economic Strategy (RSES) place an emphasis on placemaking for urban centre redevelopments, with Section 9.3 of the RSES providing guidance on Housing and Regeneration. It is considered that the overall context of each development site particularly on mixed use zoned lands in town centres should be assessed against the provisions for placemaking as set out in Section 9.3 (Housing and Regeneration) and Section 9.4 (Healthy Placemaking) of the RSES. In addition, Section 6.5 of the RSES outlines that the ***'The retail sector is a significant employer and economic contributor in the Region. It also plays a key role in placemaking and creating attractive liveable environments. As a significant attractor it enables the provision of strong mixed-use commercial cores throughout the network of city, towns and villages in the Region and can play a key role in the regeneration of areas.'***

It is also not clear from the proposed variation whether the proposed increase in the range on mixed use zoned lands for residential development would have a significant impact on the potential yield for new residential development arising on such mixed use zoned lands as per the allocation provided for in the Core Strategy Table (Table 2.12) contained in Chapter 2 of the Meath CDP 2021-2027.

The Assembly considers that the proposed variation should be considered in this context.

Section 9.3 of the RSES includes an Asset Test criterion for the strategic location of new residential development which may be referenced in the proposed variation. In relation to placemaking the following is listed as one of the criteria *'Will the development reinforce a sense of place and character, and create a healthy and attractive environment in line with good urban design principles'* which is of relevance when assessing mixed use urban development proposals.

Having regard to the full suite of amendments included for in the proposed variation, the RSES sets out 16 Regional Strategic Outcomes (RSOs) which are aligned with national policy, specifically the National Planning Framework. These are cross referenced and aligned with the three Key Principles of the RSES; Healthy Placemaking, Climate Action and Economic Opportunity. The most relevant RSO which supports the proposed variation is RSO 2, 'Compact Growth and Urban Regeneration', which is to *'promote the regeneration of our cities, towns and villages by making better use of under-used land and buildings within the existing built -up urban footprint and to drive the delivery of quality housing and employment choices for the Region's citizens'*. This aligns with National Strategic Outcome 1 of the National Planning Framework.

The proposed variation will align with RSO 2 of the RSES, and Regional Policy Objectives 3.3, 5.4 and 9.10 that relate to national standards for residential development. In addition, the proposed variation is considered complementary to the Guiding Principles for Healthy Placemaking as set out in Section 9.4 of the RSES.

In summary, the Regional Assembly does not have any objection to proposed Variation No. 3 of the Meath CDP 2021-2027 as placed on public display subject to the recommendations outlined above in this submission in relation to proposed Amendment No. 3, relating to the provision of a justification for the range of residential development allowed for under B1 Town Centre and C1 Mixed Use zoned lands. With the incorporation of the recommendations above, the Assembly would consider it to be consistent with the RSES for the Eastern and Midland Region 2019-2031.

5.0 Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA)

The proposed variation underwent a screening for Strategic Environmental Assessment (SEA) and concluded that the proposal does not require a Strategic Environmental Assessment as it would not be likely to result in significant environmental effects, taking account of the relevant criteria set out in Schedule 2A of the Planning and Development Regulations 2001 (as amended).

Furthermore, a screening for Appropriate Assessment (AA) was also carried out and concluded that the proposed variation will not have any likelihood for significant effects on any European sites, either alone or in combination with other plans or projects. The AA screening therefore concluded that it is not considered necessary to undertake any further stages of the Appropriate Assessment process. The proposed variation does not therefore require an Appropriate Assessment or the preparation of a Natura Impact Report (NIR).

6.0 Recommendations

The Regional Assembly would like to acknowledge the work that Meath County Council has carried out in order to prepare proposed Variation No. 3 to the Meath County Development Plan 2021-2027.

The Assembly advises that Meath County Council pay particular attention to the following issues in the preparation of the proposed draft Variation in order to ensure consistency with the RSES and relevant ministerial guidelines, and makes the following recommendations:

Proposed Amendment No. 2

- The Assembly notes that under proposed amendments to Section 3.8.8 (Housing for Older People), additional proposed text appears to be proposed with the changes not marked in blue to distinguish what is currently in this section of the Meath CDP 2021-2027 and what is proposed to be changed which should be clarified in the final variation.

Reason: In the interest of clarity.

Proposed Amendment No. 3

- The Assembly considers that the final variation should include a full explanation and justification for the proposed increased ranges for residential development being allowed for under B1 Town Centre and C1 Mixed-Use zoned land.

Reason: In the interest of clarity and alignment with relevant ministerial guidelines, including alignment with the Core Strategy housing allocations as provided for in the Meath CDP 2021-2027.

- It is considered that the overall context of each development site particularly on mixed use zoned lands in town centres should be assessed against the provisions for placemaking as set out in Section 9.3 (Housing and Regeneration) and Section 9.4 (Healthy Placemaking) of the RSES. The final variation should be amended to reflect same.

Reason: To ensure alignment with the RSES.

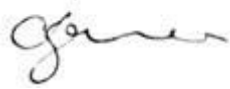
- The final variation should clarify/address whether the proposed increase in the range on mixed use zoned lands for residential development could potentially have an impact on the potential yield for new residential development arising on such mixed-use zoned lands as per the allocation provided for in the Core Strategy Table (Table 2.12) contained in Chapter 2 of the Meath CDP 2021-2027.

Reason: In the interest of clarity.

7.0 Conclusion

It is considered that proposed variation No. 3 to the Meath County Development Plan 2021-2027, is generally consistent with the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region 2019-2031 subject to addressing the recommendations set out above.

Regards,



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A/Director
Eastern and Midland Regional Assembly
11th November 2024