



Submission of Meath County Council to Ireland 2040 - Our Plan - National Planning Framework

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1.0 Introduction

Meath County Council welcomes the opportunity to provide further input into the preparation of the National Planning Framework (NPF). A detailed submission was prepared in response to the Issues and Choices Paper published in February 2017.

The Council acknowledges the importance of the NPF in setting out a growth strategy for the country which will ensure that the potential of existing centres is maximised, which will support the development of quality and attractive environments in which people can live and work, and which will harness the economic potential of the country, all in an environmentally responsible manner.

This submission identifies the key issues in the Draft NPF that are considered to be of particular relevance to the Eastern and Midlands Region as a whole and County Meath in particular. It also sets out a number of suggestions that it is considered may assist in the successful implementation of the document.

The structure of the submission follows the template of the draft document as far as is practicable.

1.1 Location and Context

Meath occupies a strategic location with the Eastern and Midlands Region and is uniquely positioned along the national motorway network with 4 national motorway networks routed through the county. The county therefore enjoys the benefit of strong transport links to the 2 largest cities on the island, Dublin and Belfast. The county has a strong network of towns that are well serviced with social and physical infrastructure. Navan, the administrative capital of the county, is located on the M3 economic corridor has the potential to act as a driver for regional growth. Dunboyne, which is the only settlement in the county that currently lies within the Metropolitan Area of Dublin, is an access rich multi-modal settlement which has the potential to become a major employment hub due to its proximity to Dublin. Other key settlements in the county include South Drogheda Environs, which is located along the Dublin-Belfast International Economic Corridor, Ashbourne, which is the second largest town in the county and benefits from its proximity to Dublin Airport, and finally Kells, which is regarded as a key employment and service centre in the north-west of the county benefiting now along with its catchment from REDZ designation.

Below these towns there is a strong network of small towns and villages that are important service centres to the rural area. The county has also a strong tradition in the agriculture and equine industry, and has some of the most valuable agricultural land in the country.

There is a wealth of natural and built heritage in Meath. The county is regarded as the 'Heritage Capital' of Ireland. This heritage includes the UNESCO World Heritage Site of Brú na Bóinne, the seat of the High Kings of Ireland at Tara, the passage tombs of Loughcrew, the largest Anglo-Norman Castle in Europe in Trim, and the historic towns of Navan, Trim, and Kells.

1.1.1 Population and household growth

The proximity of Meath to Dublin has been a central factor in the growth experienced in the county over the last 20 years, which saw the population increase by 78% between 1996-2016 and the housing stock increase by 134% during the same period.

Notwithstanding the economic conditions of the recent past, the population of Meath has continued to grow strongly, and in 2016 remained one of the fastest growing counties in the country, with a 5.9% population increase from 184,135 to 195,044 between 2011-16. This represents 10.2% of the total population in the Greater Dublin Area and 14.7% of the population of the Eastern and Midland Region.

1.1.2 Population distribution

The population in the urban areas of Meath is increasing at a higher rate than rural areas, with an 8.9% increase recorded in aggregate town areas in comparison to a 1.9% increase recorded in aggregate rural areas between 2011-16.¹ This has resulted in the proportion of the total population residing in urban areas increasing by 1.6%, from 57% to 58.6%. Inversely the proportion of the population living in rural areas has fallen from 43% to 41.4% during the same intercensal period.

The influence of Dublin on settlement growth remains apparent with commuter based settlements in the south and south-east of the county (including Ashbourne, the East Meath Settlements, and Enfield) experiencing the highest levels of population growth. Ashbourne is the fastest growing town in the county with the population increasing by 11.7% to 12,679 in 2016. This is twice the rate of growth recorded in Navan, which increased its population by 5.7% to 30,173.

1.1.3 Outbound commuting in Meath

One of the central elements of the Economic Development Strategy is the intention to address the high rate of outbound commuting in the county. The trend of outbound commuting in Meath is continuing with census 2016 recording almost 22,000 people travelling to Dublin City and Suburbs on a daily basis. The settlements in Meath with that experienced the highest level of outbound commuting are as follows:

Settlement	No. of workers	No. of workers travelling to Dublin City and Suburbs	% of workers travelling to Dublin City and Suburbs
Navan	12,193	2,505	20.5
Ashbourne	6,142	2,486	40.5
Ratoath	4,260	2,107	49.5
Dunboyne	3,295	1,653	50.2
Laytown-Bettystown-Mornington-Donacarney	4,710	1,574	33.4
Trim	3,737	910	24.4
Dunshaughlin	1,842	797	43.3
Stamullen	1,497	530	35.4
Enfield	1,424	530	37.2

Table 1: Settlements in Meath with highest outbound commuting in 2016

1.1.4 Economic Development in County Meath

There has been a change in the approach to Economic Development in Meath in recent years which has resulted in a shift from a more passive approach which considered that outward commuting for employment was acceptable, towards a 'hands on' proactive approach. The blue-print for this

¹ The census defines 'Aggregate Town Areas' as settlements with a population of 1,500 persons or more. 'Aggregate Rural Areas' refers to the population outside of 'Aggregate Town Areas'.

change in direction is set out in the Economic Development Strategy for County Meath, 2014-2022 which was tasked with providing clear, concise, innovative and evidence-based measures aimed at accelerating the economic transformation, revitalisation and sustainable development of the County. The Strategy identified that the County was operating under a sub-optimal economic development model which was not working. The Strategy was formally launched in June 2015 with the target of the creation of 7,500 jobs by 2022.

In line with National Guidance the Council has targeted the creation of 'live work communities' at the highest tier of its settlement hierarchy. As these communities become embedded in the years to come this positive planning model will become the norm. This followed the allocation of the economic function to Local Authorities under 'Putting People First' and the Local Government Reform Act 2014.

The Economic strategy integrates spatial planning, economic development, and marketing and is reflected in the current CDP 2013-19² and the Local Economic and Community Plan (LECP). The key objectives of the Strategy are as follows:

- i) Provide more employment in the county, particularly in knowledge-oriented professional services (such as IT, financial services, life services) to address outbound commuting and broaden the economic/employment base of the county and would reduce the risks to the local labour market post Brexit
- ii) Promote the creation of 'live-work communities' where people have less distance to travel between home and work and where families and communities are well served by essential infrastructure
- iii) Increase the jobs: population ratio in the county, which would ultimately result in the creation of more sustainable communities.

Supported by the IDA and Enterprise Ireland, the Council is today successfully prioritising economic development and articulating a positive and dynamic pro-employment culture throughout the organisation from which all citizens and stakeholders will benefit. The Council recognised it needed to become more proactive and business like in the way it interacts with the private sector and state job creation agencies in driving economic growth. The Council now operates a 'one point of contact approach' to incoming investors, facilitates extensive pre planning consultations and guarantees decisions in the shortest possible time.

1.1.5 Importance of connectivity with Dublin in economic development

Meath's connectivity with the Greater Dublin Area has been instrumental in the successful roll out of the Economic Development Strategy to date. For Example, the FDI announcements by Facebook, Shire and Aramark (Avoca) in the Dunboyne Area, located in the Dublin Metropolitan Area in Meath in addition to jobs growth in Navan, Kells and the Southern Environs of Drogheda.

In addition to connectivity, other assets in the county that are important in accommodating new business and employment include the capacity and availability of strategically located serviced employment lands and a well educated local labour pool.

² Following a variation to the CDP (Variation no.3 which was adopted on 23rd May 2016)

The Economic Development Strategy has identified 5 no. key strategic sites in Navan, South Drogheda, Dunboyne, Ashbourne and Kells . It is intended that these sites will be regional anchors for enterprise and employment growth in the County, and will reduce the need for residents of Meath to travel outside the County for employment.

2.0 Review of draft National Planning Framework

2.1 New National and Regional Development Strategy

The publication of the draft NPF represents a shift in policy away from ‘*balanced regional development*’ and the designation of ‘*gateways and hubs*’ as set out in the NSS towards “*a more effective balance of growth between regions.*”³ A greater emphasis has been placed on the concentration of development in cities and their surrounding metropolitan areas, with a target of 50% of national growth up to 2040 being directed to the 5 cities of Dublin, Cork, Limerick, Galway, and Waterford. There is less emphasis on the growth of large towns below city level, other than a statement that large towns with population >10,000 in 2016 in the Eastern and Midland Region should grow by between 20-25% between 2016 and 2040. Small Towns with a population of <10,000 have a targeted growth of 15% of their 2016 population by 2040.

In order to facilitate “*a more effective balance of growth*” between the regions, the Northern and Western and Southern Regions will be allowed to grow at a positively disproportionate rate to the Eastern and Midlands Region. The population targets for each Region are set out in National Policy Objective 1b and are as follows:

Region	Additional population target up to 2040	Total population 2040
Eastern and Midland Region	475-500,000	c.2,800,000
Northern and Western Region	150-175,000	c.1,000,000
Southern Region	350-375,000	c.2,000,000

Table 2: Population distribution at a regional level

Table 3.1 of the draft NPF provides a population target for each of the 5 cities, which is as follows:

City	Population 2016	Population growth to 2040		Target population 2040
		% range	People	
Dublin – City and Suburbs	1,173,000	20-25%	265,000	1,437,000
Cork – City and Suburbs	209,000	50-60%	115,000	324,000
Limerick – City and Suburbs	94,000	50-60%	52,000	146,000
Galway – City and Suburbs	80,000	50-60%	44,000	124,000
Waterford – City	54,000	50-60%	29,000	83,000

³ Page 8 of the Draft NPF

and Suburbs

Table 3: Targeted Pattern of City Population Growth as set out in the draft NPF

In terms of housing, section 5.7 of the draft NPF ‘Housing’ identifies that there is a need for an additional 550,000 new homes required in the country by 2040. The distribution of these homes is set out in Table 5.1 in the document, which is as follows⁴:

No. of units projected to 2040	Dublin City and Suburbs	Other Cities and Suburbs	Other large Urban Areas (>10,000)	Small Towns (<10,000) and Rural Areas
550,000	143,000 (26%)	132,000 (24%)	99,000 (18%)	176,000 (32%)

Table 4: Breakdown of projected housing requirements up to 2040

The rationale for this distribution is set out in section 2.3 of the draft NPF ‘Growing Our Region’. Referred to as ‘regional parity’, this approach results in the combined targeted population growth of the Northern and Western and the Southern Regions being equal to the projected growth of the Eastern and Midland Region.

2.1.1 Containment of growth in the Eastern and Midland Region

Based on an analysis of the growth rate experienced in the Eastern and Midland Region between 2011-16, the population target for the region up to 2040 would result in the curtailment of the current growth rates. Table 5 below sets out the population increase in the Region based on census 2016 and projects this forward to 2040. By following current growth rates there would be a population increase of c.571,000 in the region in 2040. This is 71,000 higher than that allocated in the NPF, which provides a population allocation of an additional 500,000 people.

	Population increase 2011-16	Average annual increase 2011-16	Total projected population increase 2016-40 ⁵	Projected population 2040
Greater Dublin Area	103,176	20,635	495,240	2,402,572
Louth, Laois, Longford, Offaly, Westmeath	15,878	3,176	76,224	497,409
Eastern and Midland Region	119,054	23,811	571,464	2,899,981

Table 5: Projected population in Eastern and Midland Region 2016-40 based on the annual average increase 2011-16

Taking this into account, Meath County Council would have legitimate concerns in relation to the population allocation for the Eastern and Midlands Region as it would restrict current growth projections that the Draft County Development Plan, 2019-2025 is working towards in line with current National and Regional Guidance. This is compounded by the fact that 53% (265,000 people) of the total allocation is to be directed towards Dublin City and Suburbs, leaving an allocation of additional population of just 235,000 for the remainder of the region up to 2040.

In effect this will result in a significant constraint being placed on the growth of settlements outside Dublin City and Suburbs and would constitute a demonstrable shift in policy direction from that set out in the 2004 and 2010 RPGs, which promoted the consolidation of development within

⁴ Further analysis of the housing allocation will be carried out in section 5.0

⁵ Calculated by multiplying the annual average increase over a 24 year period

designated growth centres in both the Metropolitan and Hinterland areas of the region. Meath County Council would reiterate that it is not opposed to targeted growth in the 4 cities outside of Dublin however it is of the opinion that the document should acknowledge the important function that the existing designated growth centres make to the economic growth of the county in terms of employment and service provision.

Meath County Council is of the opinion that rather than linking the growth of these settlements solely to a numerical population target it is considered that a more robust, evidence based analysis of the potential capacity of these settlements to deliver growth should have been carried out in conjunction with the NPF formulation. This could include water and wastewater availability, the capacity of the roads infrastructure to carry additional traffic, and public transport availability. Such an analysis would allow for better decisions to be made in relation to the proportion of growth that should be attributed to each settlement. The absence of this level of analysis from the NPF makes the exercise of developing a holistic and integrated framework for the delivery of Regional Plans problematic.

2.1.2 Settlement growth in Meath

The designated growth centres in the County Development Plan 2013-19 stem from the settlement hierarchy set out in the RPGs and are as follows:

Settlement Type	Settlement Centre
Large Growth Town I	Navan, Drogheda Environs
Large Growth Town II	Dunboyne, Maynooth Environs
Moderate Sustainable Growth Towns	Ashbourne, Kells, Trim, Kilcock Environs, Dunshaughlin

Table 6: Meath Settlement Hierarchy

The 2019-2025 County Development Plan, which is currently under review, will seek to promote the growth of Navan, South Drogheda Environs (in conjunction with Louth County Council), Dunboyne, Ashbourne, Dunshaughlin, Kells and Trim. In the case of both the Maynooth and Kilcock Environs, their town centres are located in County Kildare, therefore any development in these areas will necessarily be complementary to the development of the towns as a whole and will include the delivery of key transport and services infrastructure deficits.

2.1.2.1 Navan

Navan is the county town and administrative capital of Meath. Between 2011-16 its population increased by 5.7% to 30,173. It is the primary retail centre in the county and is designated as a Level 2 centre in the Retail Strategy for the Greater Dublin Area 2008-2016. Located approximately 45 kilometres from Dublin City Centre off the M3 motorway, it is well connected to Dublin via the motorway network and a frequent bus service.

Research undertaken in conjunction with the preparation of the Economic Development Strategy indicated that almost one-quarter of all jobs in Meath are in Navan. The town benefits from having a very attractive and well-laid out IDA Business and Technology Park (for FDI jobs), functioning existing business parks (largely indigenous enterprises) and lands/spaces for new employment development.

In order to support the creation of a quality urban environment Meath County Council has prepared a Public Realm Strategy for the town. The aim of this strategy is to create a high quality town centre that will strengthen the urban core of the town and improve accessibility and movement within the town centre.

In recognition of the 'live-work' community model in Navan, LIHAF funding was received for the delivery of a major distributor road in the town that will facilitate the delivery of c.1,600 residential units with commensurate employment opportunities.

In order to deliver on the town's significant potential for further employment creation and create a critical mass of population, additional investment in infrastructure is required. In particular the delivery of Phase 2 of the Dublin-Navan Rail line is considered to be central to Navan realising its potential in terms of improving its connectivity with Dublin and the wider region. Navan is the only administrative capital in the Greater Dublin Area that does not have a rail service to Dublin city centre i.e. Wicklow Town and Naas have a rail link to Dublin⁶. Indeed in the recently established Eastern and Midlands Region there is a rail service to Dublin from all 12 administrative capitals with the exception of Navan. This anomaly should be positively addressed in the supporting Infrastructure Investment Plan.

2.1.2.2 South Drogheda Environs

The Southern Environs of Drogheda is strategically located along the Dublin-Belfast Economic Corridor. With a total population of 40,956 (Meath and Louth combined), Drogheda remains the largest town in Ireland. The town experiences high volumes of outbound commuting at present however there is potential for the town to provide greater employment opportunities due to its accessibility and a direct rail link between the 2 largest cities on the island.

Following on from a recommendation of the Drogheda Boundary Committee, a Joint Local Area Plan and Retail Strategy is to be prepared for Drogheda. This will also be in accordance with National Policy Objective 64 of the draft NPF. Meath County Council welcomes the opportunity to collaborate and work alongside Louth County Council for the betterment of the whole of Drogheda, building on its considerable widely acknowledged economic development potential, its unique history and architectural heritage.

2.1.2.3 Dunboyne

Dunboyne is the only Large Growth Town in Meath located within the Metropolitan Area. The settlement had a population of 7,272 in 2016, which is a 4.5% increase on the population in 2011. It is strategically located in that it is adjacent to the M3 Motorway and is uniquely served by two rail stations. Section 3.7.5 of the Regional Planning Guidelines state that Dunboyne *"has yet to realise its long term potential but plays an important role in this economic growth area given its status and location on a developing rail line."* The town has a population target of 25,000 by 2033.

Dunboyne has benefitted from significant investment in capital infrastructure over the past decade. This includes the construction of Phase 1 of the Dublin-Navan Rail line and associated infrastructure including 2 no. rail stations and a park and ride facility, and the construction of the Clonee-Kells

⁶ NTA Strategy confirms the delivery of Metro North to Swords

Motorway. The completion of this infrastructure will assist in the settlement achieving its status as a Secondary Economic Growth Town in the coming years.

The attractiveness of Dunboyne as an employment location is endorsed through high profile announcements of significant FDI employment in the area by Facebook, Shire, and Aramark (Avoca).

In particular, 400 highly skilled jobs will be created in the first phase of the Shire bio-pharma manufacturing facility over the next four years.

Up to 200 jobs will be created at the Facebook Data Centre in Portan, Clonee. This is in addition to the 1,500 jobs created during the construction phase.

Aramark (Avoca) have opened its largest retail facility in Ireland in Dunboyne which resulted in the creation of 80 jobs.

Whilst it is acknowledged that Dunboyne has a population less than 10,000 (2016 census), taking account of its location in the Dublin Metropolitan Area, along a multi-modal corridor with potential to deliver significant population and employment growth on a sustainable platform, it is considered reasonable that the town should be allowed to expand at a higher rate than that currently identified in the draft NPF. It is therefore requested that provision is made to allow for an increased growth target for Dunboyne in order to maximise the return on public infrastructure and its strategic location along the M3 Corridor.

2.1.2.4 Ashbourne

Ashbourne is strategically located along the N2 close to the Meath-Fingal boundary. Its proximity to Dublin Airport and Dublin City centre has resulted in the population in the town increasing such that it is now the second largest town in the county and had a population of 12,679 in 2016. With a population increase of 11.7% between 2011-16, Ashbourne recorded the highest population growth rate in the county during this period. The 2010 RPGs recognised that Ashbourne was transitioning to Metropolitan status. Section 3.7.5 of the RPGs states as follows:

“Ashbourne is the second largest town in County Meath and has experienced significant economic growth since the 2004 RPGs. This has included the construction of a new town centre scheme comprising both office and significant retail floorspace, the expansion of the Ashbourne Industrial Estate and development of Ashbourne Business Park. Growth in the town has undoubtedly been influenced by proximity to the Metropolitan Area of Dublin and the Dublin International Airport. This move towards more holistic and sustainable development is illustrative of the transitioning of Ashbourne away from a dormitory hinterland context towards a more urbanised, metropolitan character.”

Employment and enterprise in Ashbourne benefits from its proximity to Dublin Airport and its strong links with the Dublin Metropolitan Area, in addition the town enjoys the benefit of a number of strong business and enterprise park which are operating in the town creating sustainable employment for its growing population.

2.1.2.5 Impact of the draft NPF on settlement growth in Meath

As previously indicated, Meath County Council would have serious concerns regarding the impact of the draft NPF on future settlement growth in the county. There is no objection in principle to the policy objectives of promoting compact, urban growth or the decision to allocate a higher percentage of growth to Dublin City and Suburbs. The primary concern is the proportion of growth that is to be allocated to the large and small settlements, and the impact this will have on their future growth and sustainable development.

Meath remains one of the fastest growing counties in the country. With a return to economic growth there is a strong demand for housing in the county. This demand is not likely to decrease in the immediate term. In addition to the demand for housing Meath County Council is committed to continuing to focus on the promotion of the county as a place for investment, and has recently benefitted from a number of high profile job announcements. The Council has also adopted a strategy of consolidated economic growth and has identified 5 strategic employment sites in the county at the higher tiers of the settlement hierarchy. The implementation of this Strategy will not only benefit the residents of Meath through the creation of more sustainable communities but will also benefit surrounding counties and the broader environment by reducing the level of commuting and freeing up space on the congested road network. It is requested that this proven track record in employment delivery is taken on board when finalising the population and household projections for each region in order to allow existing vibrant and serviced settlements to expand at an appropriate rate.

3.0 Implementation of the ‘New National and Regional Strategy’ having regard to the current housing shortage

Whilst Meath County Council would have no objections to the policy approach of more compact development and providing a counterbalance to Dublin by promoting the growth of the other main cities and regions, the projected growth in these cities and regions should be realistic and achievable.

The NPF is likely to come into effect in 2018, however any changes to the status quo will not happen immediately after the document is adopted. Dublin will remain the primary location for employment and the current housing shortage that the country, and in particular the Greater Dublin Area is facing, will remain the paramount challenge. There are concerns that this is not acknowledged in the NPF. Addressing the housing shortage is a long term issue that will have a fundamental impact on whether or not the NPF is successful. Taking this into account it is considered that there should be a greater emphasis on the policy response to the housing shortage in the NPF and the role that Dublin’s adjoining counties can play in addressing affordability and delivery issues.

For example, there is no reference to the targets for the delivery of new housing as set out in the Government’s Action Plan for Housing and Homelessness ‘Rebuilding Ireland’, which is presently being implemented. Indeed, there is limited reference to the difficulties in getting new homes delivered in Dublin City and Suburbs or an acknowledgement of the pressure this has placed on the existing housing stock across the region, with increased rents, house prices, and homelessness evident.

One of the initiatives to support the delivery of new housing is the introduction of the Local Infrastructure Housing Activation Fund (LIHAF) which is providing funding for major infrastructure projects that will assist in the delivery of housing. Meath County Council has received funding for a Distributor Road at Farganstown, Navan and an Outer Relief Road in Ratoath. This will facilitate the delivery of c.1,900 residential units. Similarly Maynooth, on the borders of Meath and Drogheda have benefitted and this positive Government Initiative will bear fruit in the short term with the delivery of thousands of residential units.

There is no acknowledgement of the contribution that the designated growth centres in Meath such as Navan, South Drogheda Environs, Ashbourne, and Dunshaughlin, and indeed similar sized settlements in surrounding counties, are presently making to the delivery of new homes in the region. Due to the absence of a substantial quantum of new, affordable homes in Dublin City and Suburbs, and the fact that this is unlikely to change in the short term, any constraint on the expansion of designated growth centres which are serviced and have the infrastructure available to accommodate immediate and future growth, would be considered premature and would further compound the existing housing shortage. It is therefore suggested that there is greater acknowledgement of the contribution that the designated settlements below city level are making to the growth of the economy in the Eastern and Midlands Region. This should be reflected in an amendment to the proportion of future population and housing that are to be allocated to these settlements.

4.0 Metropolitan Areas and City and Suburbs

Various terminology is used in the draft NPF when referring to cities and their surrounding hinterlands. This includes Metropolitan Areas, Cities and Suburbs, and City Regions. The document does not include a definition for each of these terms and failed to differentiate between each term. No maps were included to illustrate the extent of these areas. This results in ambiguity as to exactly what land areas and settlements the NPF is referring to. It is acknowledged that Appendix 3 confirms that the Dublin Metropolitan Area equates to the Metropolitan Area as defined in the Regional Planning Guidelines for the Greater Dublin Area and the NTA Transport Strategy for the Greater Dublin Area. It would be beneficial in the interests of clarity if this important reference was included in the main body of the document.

National Policy Objective 63 provides for the preparation of Metropolitan Area Strategic Plans (MASPs) for Dublin, Cork, Limerick, Galway, and Waterford. The inclusion of this objective would suggest the preparation of these Plans would be an integral part of the future growth of these Metropolitan Areas. However no details of future population growth in each Metropolitan Area were included in the NPF. This is in contrast to National Policy Objective 1b, which sets out the targeted population growth at a regional level, and Table 2.1, which provides details of the targeted population increase in each of the five cities and suburbs.

Taking the foregoing into account, it is considered that the NPF when published should provide a definition and associated map of each Metropolitan and City and Suburbs Area and include a targeted population for each Metropolitan Area. This information would provide greater certainty and focus in the preparation of the MASPs.

The preparation of the RSES and MASPs provides an opportune time to review how successful the designation of the Dublin Metropolitan Area has been in terms of consolidating growth towards Dublin City. Such a review could include an analysis of zoned lands in the Metropolitan Area, the quantum of these lands that have been built out, the nature/type of employment activities locating in the Metropolitan Area, the average residential density of new development, and capacities in social and physical infrastructure. This review should also assess the merits of the Metropolitan Area being extended to include additional settlements. For example Ashbourne is the second largest town in Meath and experienced the largest population growth in the county in the 2011-16 period, with a population increase of 11.7%. The town benefits from a strategic location in close proximity to Dublin Airport and along the N2 strategic road corridor. Indeed section 3.7.5 of the RPGs 2010-2022 acknowledges that Ashbourne is strongly influenced by the Dublin Metropolitan Area and is transitioning towards a settlement of “metropolitan character.”

As Dublin Airport continues to expand, it is anticipated that the strategic importance of Ashbourne as a place of employment within Meath will continue to increase. Taking this into account it would be considered logical to include Ashbourne in the Dublin Metropolitan Area. This designation would raise the profile of the town and make it a more attractive location for employers to invest, which would ultimately result in the consolidation of the town and result in the creation of a more sustainable settlement. It is therefore requested that an additional policy objective is included that commits to reviewing the parameters of the Dublin Metropolitan Area as part of the preparation of the RSES for the Eastern and Midlands Region.

The rapid growth of Ratoath to almost a population of 10,000 in 2016 and the high skill sets of its residents acknowledged in the RPGs results in the centre being a strong contender for Metropolitan area inclusion. The proximity of the town to the railhead at Pace and the preferred eastern alignment of the future Navan Rail line should also be acknowledged as supporting factors.

5.0 Housing Need and Demand

As set out in section 2.1 of this submission, section 5.7 of the draft NPF identifies the need for an additional 550,000 new homes in the country by 2040. A breakdown of the distribution of these homes is as follows:

No. of units projected to 2040	Dublin City and Suburbs	Other Cities and Suburbs	Other large Urban Areas (>10,000)	Small Towns (<10,000) and Rural Areas
550,000	143,000 (26%)	132,000 (24%)	99,000 (18%)	176,000 (32%)

Table 7: Breakdown of projected housing requirements up to 2040

This distribution demonstrates the shift towards the creation of more compact urban centres with 50% of the allocation to be directed to the 5 cities and suburbs.

Census 2016 indicated that there are 41 towns in Ireland with a population greater than 10,000. 16% (c.792,000 people) of the country’s population live in these towns. In comparison 9.2% (c.437,000 people) lived in the city and suburbs of Cork, Limerick, Galway, and Waterford. Whilst Meath County Council would have no objections to the promotion of growth in the Regional cities, there are concerns in the limited growth to be distributed to the Large Towns in the country. If this figure is

distributed evenly across the 41 centres this would equate to 2,414 additional housing units in each centre up to 2040. Such limited development would seriously constrain the growth of important local and regional towns.

In the case of Meath there are particular concerns in relation to the impact this would have on the future growth of Navan, Dunboyne⁷, South Drogheda Environs, and Ashbourne. These settlements have experienced significant population growth in the last 20 years. In addition, there has been considerable investment in physical and social infrastructure in these settlements that has provided the capacity that would allow them to continue to expand. Whilst it is acknowledged that section 3.6 of the NPF will allow settlements in the Eastern and Midlands Region with a population >10,000 to increase by 20-25% up to 2040, this is a much slower rate than what has previously been experienced. For example in the 10 year period 2006-2016 the population of Navan increased by 23.4%.

As detailed in section 1.3 the draft NPF fails to set out the current challenges facing the region with regards to housing provision. The market is slowly beginning to normalise with year on year increases in the number of completed units following a prolonged period of stagnation. The draft NPF fails to acknowledge that a considerable proportion of the demand for new housing in the region is being met by the growth settlements outside Dublin City and Suburbs. It also fails to outline the potential impact any reduction in the growth rate of the designated centres would have on the delivery of housing in the region, or the potential timeframe required to 'unlock' and deliver housing on brownfield and infill lands in Dublin City and Suburbs. Meath County Council therefore request that a review and analysis of the potential impact of any constraint on the growth of existing designated growth centres would have on the delivery of housing in the region. Such an analysis should be carried out in the context of the widely publicised challenges facing the Dublin Local Authorities in delivering new homes within Dublin City and Suburbs.

6.0 Employment Growth

National Objective 1c projects an additional 330,000 jobs will be created in the Eastern and Midland Region by 2040, which would result in approximately 1.33 million jobs in a region with a population of 2.8 million people. This would result in a population ratio of 0.475, which is a slight increase on the current baseline ratio. This is significantly higher than the current population: jobs ratio in Meath, which is less than 0.30. This is further evidence of the need to provide additional employment opportunities in the county.

The distribution of these jobs will take place at the RSES stage however National Policy Objective 2b includes a target that at least 50% of future population and jobs growth will be focused in the 5 cities, and at least 66% of this growth focused towards the cities and suburbs and a number of large and regionally distributed towns.

⁷ Whilst it is noted that the 2016 population in Dunboyne is <10,000, taking account of its location in the Dublin Metropolitan Area, its location on a multi-modal corridor, and its designation as a Large Growth Town I in the Regional Planning Guidelines Meath County Council would consider it appropriate to retain its designation as a Large Town in any revised settlement hierarchy.

Meath County Council is presently successfully implementing the 2014-2022 Economic Development Strategy for the county.⁸ As part of this strategy 5 no. strategic sites have been identified in Navan, South Drogheda, Dunboyne, Ashbourne, and Kells. It is intended that these sites will be regional anchors for enterprise and employment growth in the County, and will reduce the need for residents of Meath to travel outside the County for employment. The targeted growth of these centres would already be in accordance with National Policy Objective 2b and this should clearly be provided for in the final document.

Navan is retained as the primary development centre in the County. The strategic location of Dunboyne adjacent to a multi-modal interchange within the metropolitan area of Dublin is also identified and highlighted as key to the economic development of Meath in the coming years.

The continued population growth in Ashbourne together with its proximity to the Dublin Metropolitan Area and Dublin Area and Port has resulted in it being identified as a strategically important location for employment growth in the County. Kells, which is located in the Core Economic Area of Navan in the RPGs and is designated as a 'Secondary Economic Growth Town' is an important employment hub in the north-west of the county.

It is important that the NPF recognises that unless there are additional employment opportunities in the designated growth settlements outside of Dublin, commuting from these settlements will continue. Whilst additional housing may be provided within Dublin City and Suburbs, this does not automatically mean that people will move from these centres to the city rather than commuting to work. Indeed many of the residents of these towns may enjoy the quality of life available in these settlements and have built up ties with local schools and community groups and would therefore be reluctant to move. It is fundamental that the NPF recognises the importance of creating employment outside of cities in order to provide choice and opportunities for residents of local and regional towns who choose to either live and work locally or live locally and commute for employment.

The recognition of the potential for further economic growth along the Dublin-Belfast Economic corridor is greatly welcomed. Navan, Drogheda, and Ashbourne all have strong links and connections to this corridor and would have the capacity to provide employment with access to this economic corridor.

7.0 People, Homes, and Communities

Chapter 5 of the NPF 'People, Homes, and Communities' sets out an important framework for the creation of inclusive and adaptable communities across the country. It identifies the changing needs of people through all life cycle stages from childcare, access to education, securing a home and a job, and enjoying the local environment and amenities. Meath County Council welcomes the inclusion of this chapter in the NPF as it will significantly assist in the co-ordination and integration of land use, transport, housing, and health care policies into the future. The Council also supports the National Policy Objectives included in this chapter relating to the creation of sustainable, healthy, and age-friendly communities.

⁸ See section 1.1.3 of this submission for further details

National Policy Objective 29 requires an evidence based approach to be taken in the creation of local planning policies to meet the needs of an ageing population, with specific projections to be included in the core strategy of development plans. Whilst Meath County Council acknowledges the merits of this objective and indeed supports the incorporation of these measures into future core strategies, with the proviso that the CSO, ESRI, the Department, or the Regional Assembly provide robust and evidence based details of the projected age profile of the county in the future to support sustainable community and consensus building initiatives in the county. It is suggested that this information is provided when the population projections are being allocated as part of the preparation of the RSES.

8.0 Compact development

One of the principle visions and objectives of the NPF is compact, smart growth, which includes a target of delivering 40% of future housing in existing built up areas. Whilst this target is ambitious, the demonstrable social and economic benefits of more compact development, which include a reduction in the need to travel, utilisation of existing services and infrastructure, and environmental benefits including the preservation of habitats, are acknowledged.

Meath County Council would support the principle of such urban regeneration and the redevelopment of 'infill' and 'brownfield' lands. The flexible approach in the development of such centrally located lands is also supported as it could potentially deliver more innovative schemes that maximise the potential of the lands. However it is important that meeting this target does not take precedence over the creation of quality urban environments. This should be taken into account in matters of design and density whereby the delivery of such developments should aim to create attractive environments where people want to live, visit and relax rather than focusing on a achievement of a numerical target for its own sake.

Housing should not be the only focus in the redevelopment of existing built up areas. Projects of scale may have the potential to significantly increase the population in a confined area. If such developments are to be successfully delivered it is essential that there is adequate physical and social infrastructure to meet the needs of this increased population. Consideration must also be given to the impact such development would have on existing infrastructure e.g. roads, schools, amenity spaces etc. With this in mind, the redevelopment of brownfield lands should ensure that an appropriate combination of residential, commercial, employment, schools, and amenities are provided in urban areas to ensure the creation of a quality, sustainable urban community.

It is noted that the NPF does not include a definition of 'brownfield lands' or 'existing built up area'. Taking account of the inclusion of a target of 40% of future housing to be located in 'existing built up areas', it would be useful if a definition was included in the document as this would assist in the monitoring process.

The proposal to include a 'Smart Growth Funding Initiative' in the National Investment Plan to assist in the delivery of brownfield development is welcomed as there are often more barriers to brownfield development when compared to the development of a greenfield site. Such barriers include costs relating to site investigations, demolition, remediation, access and working constraints, diversion of utilities etc. The provision of incentives for the development of these lands could improve the viability of projects and therefore increase the likelihood of such lands being developed.

9.0 Planning for diverse rural places

The draft NPF identifies the contribution rural Ireland makes to the country in economic, social, cultural, and environmental terms. It also acknowledges the different issues facing rural areas across the country which include pressure from urban generated housing, an ageing population, isolation, and lack of access to quality infrastructure and services.

The inclusion of objectives that targets the reversal of rural decline including addressing vacancy and promoting the regeneration of small towns and villages is welcomed. In particular, Meath County Council would support national policy objective 17b, which is the development of a programme for ‘new homes in small towns and villages’ and will involve a co-ordinated approach between local authorities, public infrastructure agencies, and local communities, to provide serviced sites. This programme would assist in the revitalisation of rural towns and villages whilst also preserving the countryside from sporadic one-off housing.

The NPF has broadened the scope of the definition of a ‘rural area’ to include all settlements with a population of less than 10,000. These are to be known as ‘Small Towns’. The population growth in these settlements to 2040 is to be targeted at 15% of their 2016 population. Whilst it is acknowledged this objective is designed to prevent commuter settlements in particular from continuing to expand at an unsustainable rate, there are concerns that this would restrict towns with a wide range of services and facilities and available capacity in infrastructure to expand at a sustainable rate. Examples of such settlements in Meath include Dunshaughlin, Enfield, Stamullin and Trim where there is a strong urban centre, capacity in schools, local amenities and recently upgraded water and wastewater infrastructure. Meath County Council would consider that there is potential for these settlements to increase their population at a rate greater than 15% whilst still maintaining the principles of the NPF of providing compact growth. In this regard it is considered that there should be greater flexibility in National Objective 14 in order to facilitate the growth of certain small towns at a higher rate than others, where appropriate.

A co-ordinated and ‘joined up’ approach to rural development is demonstrated in national policy objective 24, which promotes the alignment and co-ordination of structures and funding between various agencies. Such co-ordination would considerably enhance the probability of goals and objectives relating to the regeneration of rural areas being achieved.

10.0 Working with Our Neighbours

Chapter 7 of the NPF sets out how susceptible Ireland is to changes in the international climate due to the open nature of the economy. Whilst the impact of Brexit remains unknown, it is clear that there will be implications on the movements of goods between Northern Ireland and the remainder of the UK. The importance of strengthening infrastructure connections between Ireland and Northern Ireland including transport, energy, communications and health is recognised in section 7.4 and welcomed. Such investment would also improve the investment potential along the Dublin-Belfast Economic Corridor.

The inclusion of National Policy Objective 2c, which is to improve accessibility to the north-west is welcomed. In particular Meath County Council would support the upgrade of the A5 Aughnacloy to Derry in Northern Ireland. The upgrade of this road in addition to the upgrade of the N2 Corridor

(i.e. Ardee to Ashbourne) including a bypass of Slane would significantly improve connectivity in the Region. The completion of this road will be particularly important in maintaining strong connections between the border counties in order to prevent them becoming isolated and minimising any potential adverse impacts on the local economy following Brexit.

Meath County Council welcomes the acknowledgement of the potential for continued economic growth along the Dublin-Belfast Economic Corridor. The route has the potential to provide further significant economic benefits for many sectors of society. If this corridor is to be developed further it is important that any barriers to the movement of people and goods are minimised so as not to discourage the exchange of goods, people and services.

11.0 Infrastructure

Rather than including a list of specific projects, a series of 'National Strategic Outcomes' have been identified under specific headings that will be used to inform the projects to be included in the National Investment Plan. It is critical if the NPF is to be successfully implemented that the National Investment Plan is strongly aligned with the NPF and the subsequent RSEs. In order to ensure alignment between various government agencies it is suggested that the Department should require all infrastructure agencies, including TII, NTA, and Irish Water to review their investment strategies once the NPF is adopted in order to ensure a consistent and co-ordinated approach is taken to infrastructure investment across the country.

It is noted that under National Strategic Outcome – 'Enhanced Regional Accessibility', any improvements in connectivity between regional population centres will only take place after the 'Smart Growth' objectives are being achieved. This objective is open ended as there is no specific target to indicate when these objectives are being achieved.

There are critical pieces of regional infrastructure that are required to be delivered in order to allow regional centres to continue to grow and maintain competitiveness. Such an example is the upgrade of the N2 corridor (Ardee to Ashbourne), which would also tie in with the A5 upgrade in Aughnacloy. The upgrade of this road corridor would improve connectivity to the north-west of the country and would reduce journey times between regional towns along this corridor. This will assist in maintaining the competitiveness of the region, which is particularly important in the context of Brexit.

Some of the key infrastructure projects required to facilitate the continued growth of Meath and the Eastern and Midland Region are as follows:

11.1 Transport

The major public infrastructure projects that would keep Dublin internationally competitive are set out in the document. This includes Metro North and DART Expansion projects and the BusConnects investment programme. Not all transport projects identified in the Transport Strategy for the Greater Dublin Area 2016-2035 have been referenced in the document.

Of particular concern is the failure of the document to reference Phase 2 of the Dublin to Navan Rail line, which would involve the extension of the rail line from M3 Parkway to Navan. The NTA have committed to reviewing the requirement for this railway as part of the 6 year review of the

Transport Strategy. In order to ensure alignment between this strategy and the NPF, it is considered that this should be referenced in the NPF. Data from census 2016 indicated that the private car remains the predominant mode of transport to work in Meath in 2016, with 70.4% of workers travelling to work by car in 2016. 5% travelled by bus and 1.7% by train. Increased investment in public transport in the county would ultimately reduce unsustainable travel patterns in the county towards Dublin which would also reduce congestion on the road network.

In order to ensure the economic competitiveness of the Region is retained, journey times between key settlements must be reliable. This requires a free-flowing road network. The M50 is congested at peak travel times. In the absence of a fully functioning and integrated public transport system congestion on the M50 is only going to increase, which will result in a loss of competitiveness and higher costs for commuters and businesses across the country. The National Investment Plan should identify a series of transport initiatives to deal with this issue of congestion. One such project is the Leinster Outer Orbital Route, which would have the dual benefit of removing the non-Dublin bound traffic from the M50 and would also improve the connectivity between the key growth centres in the Eastern and Midlands Region.

11.2 Broadband

The acknowledgement of the importance of high quality broadband infrastructure in providing an inclusive and connected society and the associated impact it has on the quality of life of people, businesses, and communities is welcomed. The inclusion of National Policy Objective 22, which supports the delivery of the National Broadband Plan in providing further opportunities for enterprise, employment, and education in rural areas is particularly welcomed. Indeed, the inclusion of the implementation of the National Broadband Plan and the provision of a full interconnection between the fibre networks in Northern Ireland and the Republic of Ireland as some of the potential projects to be included in the National Investment Plan is supported and welcomed by Meath County Council.

11.3 Water and Wastewater

The progression of the Eastern and Midlands Water Supply Project and the Greater Dublin Drainage project would provide additional capacity in water and waste water infrastructure in the Region. The reference to these projects is welcomed.

12.0 Realising Our Sustainable Future

This is an important part of the NPF, with the principles and objectives providing benefits to the entire community and future generations. Meath County Council support the environmental and sustainability goals set out in this chapter.

13.0 Review and Implementation

The National Planning Framework is a long term strategy with a horizon spanning over 20 years up to 2040. Meath County Council welcome the statutory footing that the NPF will have in addition to the alignment of the document with a 10 year investment plan, which will ensure co-ordination between the government's investment strategy and the long term vision for the growth of the country at a national, regional, and local level.

In recognition of recent experiences of the impact changing economic circumstances can have on the implementation of long term strategies such as the NSS and Regional Planning Guidelines, it is important that the NPF is reviewed on a periodic basis and the any potential issues constraining the successful implementation of the strategy are identified. In this regard it is suggested that the model of the Scottish NPF is followed whereby it is reviewed every 6 years and the reviews are adequately resourced. Such reviews would ensure that the NPF would be able to react to the potential impact of changes to the potential changes to the economic and political climate, an example of which would be Brexit.

14.0 Inclusion of a glossary

The draft NPF includes a number of new terms and phrases. Examples include brownfield land, city region, city and suburbs, and commuter catchment. The settlement hierarchy has also been re-structured. Whilst a general definition of some of these terms may be obvious, it is important that these are clearly defined in the national planning document. This would remove any ambiguity in the interpretation of these terms and would ensure consistency of approach is taken by all end users of the document. It is therefore suggested that a glossary of all key terms is included in the final version of the NPF. These terms could then be transposed into any future section 28 guidelines and the RSEs and CDPs and LAPs.

15.0 Joint Urban Area Plans and Standardised Core Strategies

National Policy Objective 64 requires the preparation of joint urban area plans and joint local area plans where a town and environs lies within the functional area of more than one Local Authority. This will require joint plans to be prepared for Drogheda, Maynooth, and Kilcock. Meath County Council looks forward to engaging with Louth and Kildare County Councils in this process. The reference to the relocation of 'land hungry' uses to support more dense employment development in the Metropolitan area has merit and is supported. Meath County Council is considers that this policy objective presents an opportunity to achieve collaborative working relationships with adjoining Local Authorities to achieve these outcomes.

The proposal to publish a standardised methodology for Core Strategies (National Policy Objective 65) is welcomed by Meath County Council as it will allow the preparation of Core Strategies to become more streamlined whilst also benefitting the public reading the strategies as a standardised approach will make them much easier to interpret.

16.0 Conclusion

In conclusion, the successful implementation of the NPF will be dependent on the targets and objectives being realistic and a clear strategy how these objectives are to be realised being set out.

The policy approach of targeting 'Regional Parity' by facilitating a disproportionate growth to the Northern and Western and Southern Regions appears ambitious. The strategy fails to take into account the investment in social and physical infrastructure that has taken place in designated growth towns below city level and the capacity of these settlements to expand at a sustainable rate.

The contribution and ability of the designated growth centres in Meath in harnessing and driving economic growth in the Eastern and Midland Region has not been reflected in the NPF. Instead, the document appears to constrain the expansion of these settlements in lieu of the promotion of more compact development in Dublin City and Suburbs. Whilst Meath County Council has no objection to the principle of the consolidation of growth in Dublin City and Suburbs, the NPF should also facilitate the expansion of key growth centres in a manner that would allow these towns to fulfil their potential to develop as sustainable balanced urban centres into the future based on the 'live work model'.

Meath County Council requests that this submission is fully considered in the finalisation of the National Planning Framework.