

## **Comhairle Chontae na Mí**

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## **Meath County Council**

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**Planning Department.  
12 September 2024**

Department of Housing,  
Local Government and Heritage,  
Custom House,  
Dublin 1,  
D01 W6X0.

### **RE: FIRST REVISION TO THE NATIONAL PLANNING FRAMEWORK CONSULTATION**

Dear Sir or Madam,

Meath County Council welcomes the publication of the first revision to the National Planning Framework (NPF) and the opportunity to make a submission on same. Following a request from the LGMA for submissions on the sectoral experience of the NPF at Local Authority level, Meath County Council made a submission in May 2023 and will continue to actively engage in the consultation process until the final framework is adopted.

The National Planning Framework (NPF) is a high-level strategic long-term vision for the growth of the country that can critically influence the location, sustainability, quality of life and access to services within the State. Its statutory effect ensures that it will underpin regional and local policy as well as influence public capital investment and projects that will be advanced in the current decade.

The Council firstly wish to acknowledge the considerable work that has been put into the preparation of the draft revised NPF, and in particular, the inclusion of several of the priorities raised in our previous submission. Recognition of the role of Transport Orientated Development Opportunities, the influence of blended working on settlement patterns, reference to the need for a balance between public (social) and private housing and the inclusion of Age-Friendly policies will help to better shape the country's spatial and infrastructural development over the coming decades.

However, there are several key areas previously highlighted by the Executive of Meath County Council in our previous submission in May 2023, where we believe the revised NPF could be further strengthened, particularly in the areas of:

- ESRI Growth Predictions;
- Support for Essential Strategic Infrastructure;
- Transport Orientated Development Opportunities outside the Dublin Metropolitan Area;
- Cross-Departmental Co-ordination on Infrastructure Investment;
- Support for Town Centre First Policy & Investment in Brownfield lands.
- Contingency Measures to ensure the Delivery of Housing;

- Alignment of Planning Policy with the Electricity Transmission System Operators (Eirgrid) Roadmap to a Zero Carbon Economy;

Set out below is how the enhancement or inclusion of these key strategic items are essential for the country to achieve the National Strategic Objectives set out in the NPF.

We welcome the draft NPF and present these items as recommendations which will further enhance the NPF on adoption.

## STRATEGIC RECOMMENDATIONS

### 1.1 ESRI's Growth Predictions

It is requested that the adopted NPF and ESRI's Growth Predictions be increased for County Meath and the Mid-East region between 2022 to 2030 and from 2030-2040 to allow for a more realistic tapering off in population growth in the region from 2022 onwards.

#### Relevant Section of the ESRI Population Projections, the Flow of New Households and Structural Housing Demand:

**TABLE 2.1 USUALLY RESIDENT POPULATION BY REGION**

	Population ('000s)						Annual Average Growth Rate	
	1996	2002	2006	2011	2016	2022	1996–2022	2016–2022
<b>State</b>	3626.1	3917.2	4239.8	4588.3	4761.9	5184.0	1.4%	1.4%
<b>Eastern and Midlands</b>	1703.4	1862.6	2025.5	2209.5	2328.5	2557.5	1.6%	1.6%
<b>Dublin</b>	1058.3	1122.8	1187.2	1273.1	1347.4	1468.0	1.3%	1.4%
<b>Mid-East</b>	439.6	514.4	586.6	654.0	688.9	769.3	2.2%	1.9%

**TABLE 4.1 POPULATION PROJECTIONS, BASELINE SCENARIO**

	Population ('000s)			Annual Average Growth		
	2022	2030	2040	2022–2030	2030–2040	2022–2040
<b>State</b>	5184.0	5699.9	6106.1	1.3%	0.7%	1.0%
<b>Eastern and Midlands</b>	2557.5	2856.8	3098.2	1.5%	0.8%	1.1%
<b>Dublin</b>	1468.0	1664.2	1814.6	1.6%	0.9%	1.2%
<b>Mid-East</b>	769.3	848.3	922.4	1.4%	0.9%	1.1%

## **MCC Comments**

The Council notes the baseline annual growth for Meath is set at 1.1% between 2022-2040, while the predicted yearly growth for the Mid-East region in the same period will be 1.4% up to 2030, to reduce to 0.9% thereafter<sup>1</sup>.

In light of the proposed projections, Meath County Council has reviewed the population trends in Meath and the wider Mid-East Region since 1996 and wishes to highlight the following serious concerns about the proposed growth trajectory.

The Mid-East region has historically grown at a pace of 2.2% annually since 1996<sup>2</sup>, while having grown at a rate of 1.9% in more recent years. This high growth rate is due to a combination of factors, ranging from high in-migration and relatively high natural growth rates to full employment. A planned reduction in the population projection to 1.4% in the mid-east region from 2023 onwards does not align with the demographic and economic trends evident in recent years, nor does an annual average growth of 1.1% up to 2040.

In 2018, the ESRI Report<sup>3</sup> that informed the original National Planning Framework predicted an annual average growth rate of 1.1% for the Mid-East Region up to 2040. Recent years have revealed the population assumptions of the NPF to be too conservative, mainly due to a prosperous economy and a higher rate of net migration than originally envisaged, while the region itself was shown to have grown by 1.9% in the 2022 Census. Notwithstanding this, the present ESRI Report continues to support its original growth projections, allowing for a growth of 153,100 for the Mid-East Region up to 2040 at the 1.1% growth rate previously envisaged in 2018. Having revised their figures only marginally for the region, the Council is deeply concerned that the Draft Revised NPF will once again underestimate the growth projection for the Mid-East region. This has serious implications for the provision of housing, jobs and services within the county.

In light of the Mid-East region's proximity to Dublin, its greater housing affordability, potential for remote working, and the historical patterns of internal migration from Dublin to the necklace counties as delineated in the ESRI Report<sup>4</sup>, it is considered highly unrealistic to reduce the projected growth of the region from 1.9% to 1.4% from 2022 to 2030 and 0.9% thereafter. Given that no changes to the existing economic environment, remote working opportunities, or housing values have arisen to warrant such a drastic reduction in growth, Meath County Council has carried out its own set of projections for likely growth for the region based on previous trends. While the Council recognise the Draft Revised NPFs intention to disrupt trends, and accepts that growth in the region should not continue at the pace of the last 25 years, it is strongly recommended that the final NPF consider a more realistic growth target for the Mid-East region by slowing the rate of growth by 0.2% per cent and 0.6% respectively, rather than the proposed radical drop that is currently set for the region. It is also recommended that growth expectation for the region is reduced in line with the actual, rather than planned delivery of infrastructure in Dublin City and Metropolitan area so that curtailment of growth

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<sup>1</sup> Table 4.1 Population Projections, Baseline Scenario

<sup>2</sup> Table 2.1 Usually Resident Population by Region

<sup>3</sup> [Prospects-for-Irish-Regions-and-Counties.-Scenarios-and-Implications.Jan-2018.pdf \(npf.ie\)](#), Table 4.4 Population Projections And Annual Average Population Growth Rates By Region

<sup>4</sup> Table 2.3 Top Ten Net Internal Flows by Number of People

in the mid-east is not enforced until alternative locations are readily available. Table 1 below outlines the Council's predicted growth for the Mid-East region which would provide for growth of just over **1 million** people in the region. A detailed annual breakdown of growth is provided in Appendix I. It is requested that in the consideration of the final NPF, further consideration is provided for the projections proposed below in light of the current economic and housing climate.

	Populations (000's)			Annual Average Growth		
	2022	2030	2040	2022-2030	2030-2040	2022-2040
<b>Mid-East Region</b>	769.3	880.4	1001.7	1.7%	1.3%	1.5%

Table 1: Recommendation for Table 4.1 of ESRI Population Projections Report

If the NPF underestimates the growth projection for a second consecutive period, amid a significant housing deficit, the implications for the country will be significant. It is anticipated that a series of unintended consequences could occur, namely the continuation of hotels and community facilities for emergency accommodation, the exacerbation of homelessness, the loss of community facilities to temporary accommodation and increased public spending on temporary, rather than permanent accommodation. This is added to the current pent up residential demand that exists within the private housing sector.

With respect to County Meath, growth projections for the county indicate that Meath will grow at a slower annual rate than other counties in the region despite experiencing the second-highest percentage of population growth in the country (13.2%) in the 2022 Census.

Between 2011 – 2022, Meath's population increased by 36,691, with an annual average growth of 1.65%. The growth that occurred in this 11-year timeframe spanned across a period when Meath endured both a challenging economic environment with low economic and population growth and a high-growth period when economic and population growth resumed. It is reasonable to assume that the level of growth that occurred within this period represents an average growth rate that Meath County Council would predict as likely to re-occur over the next 16 years. For this reason, the Council has carried out its own set of projections for likely growth in the county based on this trend which is summarized in Table 2 below. It is recommended that the growth expectation for the county is increased to at least 1.65% up to 2030 and is then reduced to 1.3% thereafter and in line with the actual, rather than planned delivery of infrastructure in Dublin City and Metropolitan area. This will allow for growth of up to **288,300** for County Meath up to 2040. A detailed annual breakdown of growth for the County is provided in Appendix II.

	Populations (000's)				Annual Growth in % 2022-2040	
	2022	2027	2032	2040	Baseline 2023-2030	Baseline 2030-2040
<b>Meath</b>	222.3	241.2	260	288.3	1.65%	1.3%

Table 2: Recommendation for Table A.1 Population Projections

A key concern for County Meath is that the proposed population projection for the county in the ESRI Report will fail to plan for the growth pressures the county faces and for the demands it will place on our built, natural environment and social fabric. The Council once again wish to emphasize the unintended consequences that could occur by underestimating growth in the county, namely the likely proliferation of one-off housing if housing needs cannot be met

through a sufficient amount of serviced residentially zoned lands in its urban areas. This would be contrary to the compact growth and low carbon objectives set out in the NPF.

Meath County Council raised concerns relating to the restrictive population allocation for the county and region in our submission to the Draft NPF in 2017 and despite the NPF's efforts to curb growth in the region, development pressure in the affected counties has not reduced nor has the growth trajectory been altered. This has led to challenges such as underfunding for transportation, community and health infrastructure due to the unplanned growth that has occurred. It is reiterated here that such projections must be revisited to reflect a more realistic growth projection for the county.

The National Planning Framework (NPF) can impact various strategic outcomes; however, the 2022 Census data has shown that the NPF's objectives have not successfully influenced the rate of growth or market prices in Ireland. Factors like migration, economic fluctuations, and property prices are partially or completely beyond the NPF's control. Nevertheless, these factors continue to shape settlement patterns. If the NPF limits housing supply in affordable areas without simultaneously addressing the high cost of housing in larger urban centres, the housing crisis could worsen, necessitating further government intervention to provide affordable housing.

Meath has seen significant growth in recent years, and it is important to ensure that the development of housing, social, and economic services is not hindered by underestimating this growth. The Council has requested that the Draft Revised NPF and any future review of the RSES take into account the recent growth trends in the county and plan for a more gradual reduction in population up to 2040, rather than the significant and sudden drop as currently proposed. Inaction on this issue would be contrary to Section 2.1 of the NPF, which acknowledges that shifting a long-term trend will not happen overnight and will require careful balancing.

Therefore, it is suggested that the growth projection of 1.1% be revised upwards to 1.65% up to 2030 and at least 1.3% up to 2040, recognizing that growth projections are likely to follow trends unless specific and significant interventions are implemented.

The Draft NPF proposes to disrupt trends that have been apparent for the last 25 years by carrying out a shift in policy direction<sup>5</sup>. However, it recognizes that significant shifts will take time to materialize. From both a planning and capital funding perspective, a revised growth projection similar to that outlined in Table 2 or a headroom, similar to that provided by EMRA in the previous RSES, is requested for County Meath. This will allow regional balance measures to take effect and provide a more realistic growth forecast in the immediate years ahead.

## **1.2 Structural Housing Demand Projections for Local Authorities**

**It is requested that the final NPF provides clarity on the disparity between the Housing Demand figures set out in Table A.2 of the ESRI Report and the figure of 50,000 set out in NPO 43 of the Draft Revised NPF.**

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<sup>5</sup> Draft NPF, Section 2.1 Realising Ambition and Potential.

**TABLE A.2 STRUCTURAL HOUSING DEMAND PROJECTIONS BY LOCAL AUTHORITY**

National Policy Objective 43 <i>To target the delivery of housing to accommodate approximately 50,000 additional households per annum to 2040.</i>	Average Across All Assumptions		Lowest		Highest	
			low migr, current trend headship & 0.25% obs.		high migr, lower hh size headship & 0.5% obs.	
	2023–2030	2030–2040	2023–2030	2030–2040	2023–2030	2030–2040
<b>State</b>	<b>44,047</b>	<b>39,654</b>	<b>35,018</b>	<b>27,805</b>	<b>53,294</b>	<b>52,445</b>

**MCC Comments**

Meath County Council have reviewed the ESRI's Population and Household Projections that inform the NPF. While noting that the population projections up to 2040 are largely aligned, it appears that, while the Draft Revised NPF plans for approximately 50,000 additional households per annum to 2040, the average household figures outlined for the State in Table A.2 of the ESRI Report do not correlate with this figure. Under the ESRI's average assumption, a total of 704,869 units would be required between 2023-2040, averaging a requirement of 41,463 units per year. It is unclear if the target set out in NPO 43 for 50,000 households incorporates factors such as pent-up demand and vacancy rates, as otherwise, the number of units to be delivered by 2040 could far exceed the anticipated population growth. If this is the case, it is asked that the final NPF provide clarity on the factors that make up the figure of 50,000 and ensure that the household allocation figures outlined in Table A.2 are not the final figures provided to local authorities and are revised upwards to include pent-up demand and vacancy rates amongst housing stock.

**1.3 Contingency Plan for Delivery of Housing in Serviced Settlements.**

*It is recommended that the NPF includes contingency measures to guarantee that housing can be provided in alternative suitable locations in circumstances where the Cities and metropolitan areas are unable to meet their housing demands.*

***Relevant Section of the Draft Revised NPF***

*Section 2.4 Growing our Regions*

*...The revised Framework maintains the 'regional parity' approach, and in doing so, the additional population growth projected between 2022 and 2030 will be targeted on a pro-rata basis throughout Ireland. This means more targeted growth everywhere, including for the four regional cities. However, the scale of growth that is projected in Ireland to 2040 coupled with the need to transition to a lower carbon society requires an increased delivery of housing and the improved integration of land-use and transport.*

*Census 2022 and other indicators highlight significant unmet demand for housing in Dublin and the Mid-Eastern Region in particular. This has the potential to undermine national competitiveness and social cohesion. As a result, there may be a requirement to plan for population growth that would exceed the overall 6.1m projection, in line with the high*

*migration scenario provided in the ESRI's Report. However, this can only be undertaken and delivered in line with longer term strategic planning for Transport Orientated Development (TOD) in Ireland's five Cities. The purpose of this is to support the delivery of new sustainable communities at brownfield and greenfield locations along existing or planned high capacity public transport corridors within the metropolitan area, with a particular focus on TOD opportunities along high-capacity rail corridors. The allocation for these new sustainable communities provide greater flexibility to plan for future growth and investment.*

The NPF is a long-term framework that plans for growth up to 2040 and in doing so, recommends a range of long-term measures such as Transport Orientated Development and greater regional balance. The long-term nature of the document is evident in its reading and the significant number of references to long-term solutions is evident. While the Council commends and supports the measures outlined above, we have concerns that achieving regional parity may not be possible in the necessary timeframe and that the struggle to achieve such balance will stand in the way of executing imperfect but valuable measures, thereby allowing the perfect to become the enemy of the good.

It is crucial to remember the significance of the NPF as a long-term framework that paves the way for growth up to the year 2040. The Revised Framework recommends a variety of measures, such as Transport Orientated Development and regional parity to ensure sustainable development. While the Council acknowledges these measures, it is essential to recognise that attaining regional parity within the necessary timeframe has already, and may prove to be a future challenge. The pursuit of such balance should not hinder the implementation of valuable measures and striving for perfection should not impede progress towards achieving significant and beneficial goals of delivering housing in a sustainable form and in appropriate places where demand exists.

Currently, neither the revised draft NPF or the ESRI Population Projections contain any interim or immediate solutions to address the pent-up demand that has aggressively occurred since the NPF was first adopted. A catch-up in housing delivery is imminently required, alongside the need to deliver supporting community infrastructure to ensure housing developments are well-integrated, sustainable and adequately serviced. The urgency of this deficit is recognized by the recommendations of the Housing Commission Report published in May 2024 where a dedicated strategy and policy response is recommended to tackle the housing deficit as rapidly and sustainably as possible. Meath County Council are concerned that the growth objectives proposed in the NPF are of a nature that will resolve the housing crisis at a pace that will leave the current generation of millennials without the prospect of home ownership and indeed many more people homeless. This trend is reflected in Central Bank of Ireland data, which shows the typical first-time buyer as 35 years old, the highest age on record with almost half of first-time buyers (44 per cent) older than 35. Research by the Economic and Social Research Institute (ESRI) found that the share of 25-34 year olds who own their own home more than halved between 2004 and 2019, falling from 60 per cent to just 27 per cent<sup>6</sup>.

In contrast to this data, Meath County Council has faced a significant challenge whereby it has reached its housing allocation for several strategic multi-modal settlements. Despite having appropriately zoned, serviced, strategic landbanks owned by landowners that are ready to

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<sup>6</sup> <chrome-extension://efaidnbmnnnibpcajpcgclefindmkaj/https://www.esri.ie/system/files/publications/RS143.pdf>

deliver, the Council may be unable to accommodate additional residential units in such settlements. The opportunity foregone will be that these settlements in County Meath could provide a significant quantum of residential units in a sustainable format. Critically, the land activation measures that are proposed to activate residential lands will be of no benefit in a settlement where housing allocations have been reached.

To counteract the risk of further housing shortfalls where infrastructure constraints exist, and to maximize the use of available infrastructure, Meath County Council suggest that some form of a contingency plan is introduced in the revised NPF where future growth can be directed and accommodated in multi modal settlements that have appropriately zoned, serviced strategic landbanks that are owned by developers / landowners that have the capacity to deliver additional housing units. This plan should cater for an unmet housing demand scenario in non-performing settlements by allowing core strategy targets to be exceeded in other centres of scale that contain all the appropriate supporting infrastructure and services, subject to agreement with the Regional Assembly.

Section 2.4 of the Draft NPF acknowledges the significant unmet housing demand that was evident in Dublin and the mid-eastern region in the 2022 census and allows for a provision to exceed the growth projection, but only in Transport Orientated Development sites across the cities. If Dublin Local Authorities and those settlements within the metropolitan area are unable to deliver the number of units required to meet their current and future housing demand, Meath County Council recommend that there should be provision, or guidance for future revisions to RSES, in the revised NPF for the redistribution of units to other multi-modal settlements outside of the cities, and along high capacity public transport corridors provided that they can demonstrate their capacity to accommodate and deliver the required units in line with supporting social infrastructure. While this is contrary to the targeted city growth as embedded in the revised NPF, this measure should only be facilitated where housing demand is not being met within the Cities and metropolitan areas. The key town of Navan and the proposed rail corridor to Pace / Dunboyne is one such example.

Collective thinking between government departments is also required to resolve the housing crisis and the Draft revised NPF is the key vehicle as to how this should be managed. A Contingency Plan for future development is essential to avoid the impromptu unsustainable living arrangements that we are presently seeing around the country.

Accordingly, Meath County Council recommends the incorporation of the following paragraph in Section 2.4 Growing our Regions:

*....The revised Framework maintains the 'regional parity' approach, and in doing so, the additional population growth projected between 2022 and 2030 will be targeted on a pro-rata basis throughout Ireland. This means more targeted growth everywhere, including for the four regional cities. However, the scale of growth that is projected in Ireland to 2040 coupled with the need to transition to a lower carbon society requires an increased delivery of housing and the improved integration of land use and transport.*

*While the revised Framework aims to focus at least half of all new homes in the five cities, challenges to the delivery of vital infrastructure arising from funding, cost*

*escalations, environmental constraints, contractor availability, market competitiveness, and project complexity can all influence the timely delivery of projects. Acknowledging the possibility that cities and metropolitan areas may fail to accommodate the entirety of the prescribed housing targets within the required timeframe, the NPF advocates for the activation of contingency measures to promote an alternative development pattern that will continue to support regional parity and compact growth in regional and key settlements.*

*In instances where the cities and their metropolitan areas are unable to supply the necessary housing units to fulfil the NPFs housing objectives, it would be reasonable to redirect population growth to other centres of scale within the region, provided they can demonstrate an ability to deliver the required units and supporting social infrastructure for additional households. The identification and approval of these settlements will be conducted and approved in collaboration with the Regional Assembly.*

*Census 2022 and other indicators highlight significant unmet demand for housing in Dublin and the Mid-Eastern Region in particular. This has the potential to undermine national competitiveness and social cohesion. As a result, there may be a requirement to plan for population growth that would exceed the overall 6.1m projection, in line with the high migration scenario provided in the ESRI's Report. However, this can only be undertaken and delivered in **multi-modal centres of scale** ~~line~~ with longer term strategic planning for Transport Orientated Development (TOD) **in Regional Centres and Key Growth Towns.** ~~in Ireland's five Cities.~~*

#### **1.4 Support for Essential Key Infrastructure in the Eastern and Midlands Region.**

**It is strongly recommended that a paragraph is referenced and included in this section of the revised NPF in identifying the necessary critical strategic infrastructure, including the Navan Rail Link, that is required to support the sustainable development of the Midlands and Eastern region.**

##### ***Relevant Section of the Revised Draft NPF;***

##### ***Section 3.2 Eastern and Midland Region***

##### ***Mid-East***

*The strategic location of counties Kildare, Meath and Wicklow, proximate to the Capital, has in part, resulted in significant development in a region characterised by the dominance of Dublin. The Mid- East has experienced high levels of population growth in recent decades, at more than twice the national growth rate. Census data indicates that this pattern is continuing with population growth in the Mid-East exceeding the national average rate in the 2016 to 2022 period. Managing the challenges of future growth is critical to this regional area. A more balanced and sustainable pattern of development, with a greater focus on addressing employment creation, local infrastructure needs, including in particular social and community infrastructure in areas such as education and amenity, and addressing the legacy of rapid growth, must be prioritised.*

*This means that housing development should be infrastructure led and primarily based on employment growth, accessibility by sustainable transport modes and quality of life, rather than unsustainable commuting patterns.*

### **MCC Comments**

Meath County Council supports the above analysis but it must be recognized that increasing levels of population growth are being directed, targeted and accommodated within higher tier settlements in County Meath where lands are zoned and serviced appropriately. Dunboyne is a strategically important settlement in County Meath. Located within the Metropolitan area and proximate to the border with Fingal County Council, it is the only town in County Meath that is entirely in the Metropolitan Area of Dublin. The settlement benefits from a multi-modal transport system consisting of excellent road and rail links (with 2 train stations) whilst the telecommunications and energy infrastructure available also makes the town an attractive location for future investment. Meath County Council wish to acknowledge the NPF's recognition and support for strategically located settlements of this nature and their ability to accommodate significant population and jobs growth. Given the high-capacity public transport corridor, and support in the Draft Revised NPF, it is anticipated that Dunboyne will experience significant growth over the next decade and significantly increase its share of population growth in County Meath during the life of the NPF and up to 2040. The current Meath County Development Plan 2021-2027 supports this framework and strategy and will deliver significant residential and commercial development over and next decades.

Phase 2 of the proposed Dublin-Navan Rail line will comprise the extension of the Rail link at Pace in Dunboyne to the centre of Navan. Navan is a Key town in the RSES, is the county town and administrative capital of Meath that has grown its population from 12,810 to 33,886 between 1996-2022. It is the primary retail centre in the county and is designated as a Level 2 centre in the Retail Hierarchy. Research undertaken as part of the Economic Development Strategy indicated that almost one fifth of all jobs in Meath are in Navan. The town benefits from having an attractive and fully serviced IDA Business and Technology Park (for FDI jobs), functioning existing business parks (largely indigenous enterprises) and significant land bank and strategic employment and serviced commercial sites with significant potential for new employment development. Located approximately 45 kilometres from Dublin City Centre off the M3 motorway, it is well connected to Dublin via the motorway network and runs a frequent, fully utilised, bus service.

Notwithstanding this connectivity, the county town of Navan and its environs, which represents almost 40,000 of Meath's residents, and the towns of Dunshaughlin (6,644) Ratoath (10,077), Ashbourne (15,680), remain without a rail service to Dublin. This current lack of a rail spine through the centre of County Meath and connecting it to Dublin leaves it at a comparative disadvantage to all other counties well served via rail networks and associated services.

Current modes of travel from Navan to Dunboyne and Dublin are limited to bus and car. Having regard to the commuting patterns from this area, the delivery of Phase 2 of the Dublin-Navan Rail line is central to Navan realising its potential in terms of improving its connectivity, sustainability and reducing the counties carbon footprint. 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 Dublin. Indeed, with the exception of Navan, a rail

service to Dublin is available from all other administrative centres in the Midlands and Eastern Region.

The delivery of a rail link to Navan is essential for Meath to deliver on the National Strategic Outcomes outlined in the NPF as it would contribute to the delivery of NSO2, NSO4 and NSO8 by not only offering sustainable mobility and enhancing regional accessibility but would contribute in a significant way to our transition to a low carbon and climate resilient society. Having regard to the catchment area and current commuting patterns, it is submitted that the delivery of a Rail Link to Navan would profoundly impact the achievement of the National Strategic Outcomes listed in the Draft Revised NPF, particularly for the Mid-East region.

Section 3.2 of the Draft Revised NPF summarises the Eastern and Midlands Region and broadly delineates the priorities for each sub-region. However, it is notable that the Mid-East Region does not specify the necessary critical strategic infrastructure, unlike the section pertaining to the Dublin City and Metropolitan Area. Given that the region is estimated to have a population of approximately 3 million people by 2040, it is imperative that each subsection receive equal consideration. The Navan Rail line has already been incorporated into the NTA GDA Transport Strategy 2022 and has now progressed to the appointment of a Project Manager by Irish Rail and Consultants to carry out the route selection, planning and environmental assessments. To demonstrate the NPF's support for the project and more critically, to ensure the Navan to Dublin Rail Project is included in the next revision of the National Development Plan, it is strongly recommended that the following paragraph be incorporated into Section 3.2 at the end of the Mid-East section on p27/28 or the Draft Revision.

*'This means that housing development should be infrastructure-led and primarily based on employment growth, accessibility by sustainable transport modes and quality of life, rather than unsustainable commuting patterns. The delivery of infrastructure in key areas such as transport, water, education, health and community services are therefore essential to the Mid-East region into the future. Priorities include the expansion of the public transport network with the delivery of the Navan-Dublin Rail Link and enhanced bus services, with improved water and wastewater capacity through projects such as the Blanchardstown Sewerage Scheme and the Midlands Water Supply Project.'*

### **1.5 Recognition of Transport-Orientated Development Sites outside the Dublin Metropolitan Area.**

**It is recommended that the revised NPF provides for and identifies a second tranche of Transport Orientated Development (TOD) sites around existing or planned high-capacity public transport corridors in Regional Growth Centres and Key Towns.**

#### **Relevant Section of the revised draft NPF:**

#### **Section 10.2 *The Planning System - Integrating Spatial and Transport Planning***

*The Department of Housing, Local Government and Heritage and the Department of Transport are working with the LDA, NTA, local and regional authorities and infrastructure providers to identify*

*suitable opportunities for Transport Orientated Development (TOD) at scale in the five cities, aligned to planned investment in the public transport network. Transport Orientated Development supports NPF priorities for Compact Growth, Sustainable Mobility and Transition to a Low Carbon and Climate Resilient Society. Engagement with the relevant local authorities, LDA and NTA and infrastructure providers will continue to allow strategic planning for largescale sustainable development projects to commence at the locations identified, and at locations that come forward during the NPF period. This work facilitates the identification and development of the necessary policy provisions at national, regional and local levels, and enhanced institutional and funding arrangements required to accelerate delivery. The two Departments are also reviewing opportunities for better integration of land use and transport in the regional centres. While locations outside of the metropolitan areas may not be suitable for large-scale TOD, the principles of TOD can be applied at local level to support compact development, sustainable mobility and climate targets.*

### **MCC Comments**

As outlined in our previous submission, Meath County Council believes that a change in strategy is now required whereby Transport Orientated Development (TOD) is pursued by investing in and growing settlements where high-capacity public transport infrastructure exists or is proposed in the future. The Council supports the inclusion of TOD sites in the revised NPF to support the delivery of new sustainable communities at brownfield and greenfield locations along existing or planned high-capacity public transport corridors within the metropolitan area, with a particular focus on TOD opportunities along high-capacity rail corridors. However, it is submitted that the decision to confine TOD sites to cities and the wider metropolitan area is overly restrictive and excludes opportunities in other multi-modal settlements that fall within the TOD criteria.

Whilst it is acknowledged that targeting cities will represent a shift from current population trends, the restrictive nature of the current TOD policy fails to recognise opportunities that exist in Regional Growth Centres and Key Towns, and in particular sites that would contribute to urban regeneration within towns. (e.g strategic landbanks proximate to Drogheda Rail Station and the future Navan Central Rail Station)

In May 2023, Meath County Council submitted Candidate TOD sites for consideration by the Department of Housing, Local Government and Heritage (DHLGH). Further engagement from the Department indicated that Dunboyne and Drogheda were significant opportunity sites that warranted further consideration due to the future delivery of the Dart+ Programme to both these locations. It was also acknowledged that Navan could be a potential longer-term candidate TOD site at the proposed extended town centre site that will include the new Navan Central Rail Station housed within a new town centre incorporating new public plaza and wider multi storey mixed use development

Acknowledging that cities should be prioritised, it is recommended that a second tranche of TOD Sites should be provided for and identified in the revised NPF in order to support and develop sustainable growth within Regional Growth Centres and Key Towns that are optimally placed to accommodate such growth and would support the National Strategic Outcomes of the NPF, in particular outcomes relating to Compact Growth, Sustainable Mobility and Transition to a Low Carbon and Climate Resilient Society. The Council refers to Section 2.1 of the Draft Revised NPF which emphasises that a settlement that is not specifically identified or for which specific targets are not set in this national Framework, is by no means precluded from future growth or investment. The identification of a second tranche of TOD Sites supports

this concept by enabling investment at regional and local scales that would achieve the National Strategic Outcomes identified.

Accordingly, Meath County Council requests that the following National Policy Objective be incorporated after National Policy Objective 93 into the final NPF.

***National Policy Objective XX***

*In nationwide locations where there are existing corridors with high-frequency public bus, and rail transport or planned major public transportation projects, Transportation Orientated Development (TOD) opportunities will be advanced to ensure a coordinated approach is taken to the creation of new sustainable communities around high-capacity public transport corridors. Such TOD opportunities will be intrinsically linked to the funding status and progress of the transportation project and the principles of Transport Orientated Development.*

**1.6 Cross-Departmental Co-ordination on Infrastructure Investment.**

*It is recommended that the NPF further emphasises the importance of cross-departmental co-ordination on infrastructure investment to ensure the appropriate and required infrastructure is in situ prior to and in parallel with any proposed residential and population growth.*

**Relevant Section of the revised draft NPF:**

Section 3.1 *Strategic Development of Ireland's Regions* states;

*It is clear that a strengthening of institutional and governance arrangements to coordinate implementation of the NPF at national, regional and metropolitan levels, across all stakeholders involved, will be required if the strategy is to be delivered successfully. The broad range of stakeholders involved in delivering the social, community and 'hard' infrastructure elements required to facilitate transformative growth in metropolitan areas – including not just regional assemblies and county and city councils but also Government Departments and agencies such as Uisce Éireann, TII, NTA, OPW, port authorities - requires a level of coordination and interaction at the national, regional and metropolitan scale.*

**MCC Comments**

Section 3.1 - Strategic Development of Ireland's Regions of the revised NPF includes body text outlining that co-ordination and interaction will be required between Government Departments and county councils if the strategy is to be delivered successfully.

As outlined in our previous submission, supporting facilities and services need to be developed prior to or in parallel with housing development. The National Development Plan (NDP) primarily focuses on investment in transport and water services, but does not set out the investment agenda for supporting community infrastructure including Garda Stations, schools, community facilities, health facilities, enterprise, etc. NPO 10 refers to good access to quality childcare, education and health services and Page 6 of the Draft NPF sets out a high-level overview of the major investments under this objective. While acknowledging that these areas may receive substantial investment, it is not clear how government departments engage with one another to ensure a coordinated approach is taken to development.

It is an aim of the revised NPF to *‘Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location (NPO 44).’* Notwithstanding the merits of this objective, the Council has recently been made aware that funding for a proposed Wastewater Transfer Pipeline in Maynooth, a settlement that previously had a population growth target of up to 10,000 persons up to 2031 by the MASP, has been withdrawn. The consequences of withdrawing investment on such critical infrastructure can effectively halt growth in locations where growth has been targeted.

The importance of cross-departmental co-ordination on infrastructure investment is fundamental to the success of NPO 44 and all Government Departments need to be involved to ensure investment priorities are aligned to put the appropriate and required infrastructure in situ prior to and in parallel with any proposed residential and population growth.

Recognition of the need for greater co-ordination at whole of government level across all infrastructure projects has been highlighted in the Expert Group Review of the Draft Revised NPF in Section 1.4. However, given the essential nature of this recommendation, Meath County Council recommend that the Revised NPF go one step further to include an additional objective to support the recommendation of the Expert Group as follows:

***NPO XX***

***Establish a cross-government Committee to synchronise infrastructure investment, ensuring that all relevant departments collaborate to align priorities, optimize resource allocation, and deliver cohesive projects that support the implementation of National Policy Objective 44***

## **1.7 Support for Town Centre First Policy & Investment in Brownfield Lands**

***It is recommended that, in addition to the existing funding streams, government funding and supports are created for redevelopment of brownfield lands to support Town Centre First Policy.***

### ***Relevant Section of the Revised Draft NPF:***

*Section 5.3 Planning for the Future Growth and Development of Rural Areas*

*Rural Towns*

*....Town Centre First - A Policy Approach for Irish Towns provides a co-ordinated, whole-of-government policy framework to proactively address the decline in the health of towns across Ireland and supports measures to regenerate and revitalise them. It highlights how re-use and regeneration of vacant and derelict buildings can be an essential catalyst to transforming the capacity and potential of smaller towns in Ireland. The policy was launched in 2022 and 26 ‘Pathfinder towns’ were identified nationally to develop a community-based Town Centre First Plan that will set out a vision for their town, and identify priority regeneration projects for subsequent appropriate funding applications and delivery. Further to the funding of the pilot 26 towns, a new package of supports will be launched in 2024 to expand on the delivery of the objectives within Town Centre First.*

## **MCC Comments**

As outlined in our previous submission, the original NPF and the current revised Draft NPF sets a target of 40% of new homes to take place on brownfield sites, i.e. sites already within urban areas. However, quite often these sites are more expensive to develop due to logistical, contamination and environmental factors, being smaller in scale, as well as having legacy ownership issues which further complicate delivery. Brownfield lands represent opportune locations for the government to consider pursuing through compulsory purchase to provide housing and other community uses in town and village centre locations. The Council requests a thorough exploration of funding or grants aimed at redeveloping brownfield lands on a case-by-case basis to support the Town Centre First policy.

### **1.8 Policy Support for a Generation-Led Approach to Achieving a Zero-Carbon Economy**

**It is recommended that the revised NPF advocate for the transition from carbon-intensive grey industry to the development of Green Campuses by recommending land use zoning measures that will strategically locate energy centres within and around existing key grid infrastructure.**

#### ***Relevant Section of the Revised Draft NPF:***

##### ***7.1 Integrated Land and Maritime Planning***

*..... Complex relationships between land and maritime activity require coordination of many different sectors and actors. Some sectors and activities, such as renewable energy, can have a presence both on land and in the maritime area and require facilities and infrastructure which traverse both areas.*

*The planning system plays an important role in permitting the infrastructure necessary to capture, store and transmit such energy to consumers, and in doing so, enable Ireland to utilise its vast and sustainable offshore wind and other energy resources. Offshore renewable energy production can also offer the potential to attract new green industries with high-energy needs to those locations.*

## **MCC Comments**

Section 7.1 of the revised draft NPF emphasizes the important role that the planning system holds in the delivery of offshore renewable energy development outlining that ‘renewable energy can have presence on land and in the maritime area that require facilities and infrastructure which traverse both areas’. While it can be assumed that this refers to aspects of wind energy development such as the grid connection and substation development, maintenance and servicing facilities, though ancillary, are essential to cater for the operation of offshore wind energy developments. It is recommended that Section 7.1 elaborates and supports the appropriate planning for land-based facilities as the maritime infrastructure cannot operate without these land-based components. We note that NPO 51 and 52 support the delivery of harbour infrastructure for offshore renewables but request that further clarity is provided at the outset in Paragraph 3 of Section 7.1 to state:

‘Some sectors and activities, such as renewable energy, can have a presence both on land and in the maritime area and require facilities and infrastructure which traverse both areas. **While turbines are placed at sea, grid connectivity, substation placement**

*and Maintenance and Servicing facilities are all critical land-based components of Offshore Renewable Energy Development.’*

**Relevant Section of the Revised Draft NPF:**

**Section 9.2 Resource Efficiency and Transition to a Zero Carbon Economy**

**Climate Action and Planning**

*...If Ireland is to make up for lost ground in relation to carbon reduction targets and move towards the objective of a zero carbon and climate-resilient Ireland by 2050, it is necessary to make choices about how we balance growth with more sustainable approaches to development and land use and to examine how planning policy can help shape national infrastructural decisions.*

**MCC Comments**

The role of the planning process is not only to facilitate the development of the necessary infrastructure to create, transmit and store electricity for consumers. The planning system must also develop land-use zoning objectives that support our Electricity Transmission System Operators (Eirgrid) in taking a Generation-Led Approach to achieving our 2050 renewable energy targets. A Generation-Led Approach plans for the placement of electricity generators closest to the biggest users, thereby minimizing grid infrastructure requirements and minimizing electricity lost over transmission distances. When applying this approach, lands near high-voltage substations are optimal locations for new green industries with high-energy requirements.

Meath County Council proposes that lands near existing and proposed grid and utility infrastructure be prioritized for mixed-use industrial campuses offering low carbon energy solutions. Traditionally, our landuse planning system has focused all such new development within and around urban areas but not focusing on where the power is around nodal points such as existing larger ESB sub stations and associated infrastructure. By doing this, the planning system will not only support Irelands Roadmap to our 2050 targets, but will support industries that avail of green technology while incentivizing and facilitating carbon-intensive industries to make similar transitions. Policies of this nature will be essential to meeting our zero carbon commitments whilst allowing our economy to remain open and attractive.

Accordingly, MCC submit that the NPF and Transmission System Operator, Eirgrid ensures that a coordinated approach is taken to achieving a Zero Carbon Economy by providing supportive land-use zoning measures that align with a Generation-Led approach. We submit that the following text be included in Section 9.2 under the subsection on Climate Action and Planning after paragraph 6.

*If Ireland is to make up for lost ground in relation to carbon reduction targets and move towards the objective of a zero carbon and climate-resilient Ireland by 2050, it is necessary to make choices about how we balance growth with more sustainable approaches to development and land use and to examine how planning policy can help shape national infrastructural decisions. **One such method in which planning policy can support the decarbonisation of the electricity sector is by creating land use zoning objectives that prioritise lands near existing and proposed grid and utility***

*infrastructure for mixed-use industrial campuses offering low-carbon energy solutions. By doing this, the planning system will not only support Irelands Roadmap to our 2050 targets, but will support industries that avail of green technology while incentivizing and facilitating carbon-intensive industries to make similar transitions. Policies of this nature will be essential to meeting our zero carbon commitments whilst allowing our economy to remain open and attractive.*

*By prioritizing such lands for industries fueled by green energy technologies, or low carbon energy campuses, the planning system can not only support the Transmission System Operators Roadmap to achieving its renewable ambition but can support industries that avail of green technology while incentivising and facilitating industries to make similar transitions. Policies of this nature will be essential to meeting our zero carbon commitments whilst allowing our economy to remain open and attractive.*

**Conclusion**

Meath County Council very much welcomes the publication of the draft NPF. We commend the content and extensive nature of this draft policy document which brings together a myriad of policies and considerations to create a framework that will further enhance the national strategic outcomes and priorities set out in the previous and proposed Framework.

We request that the changes identified herein be adopted in the NPF in order to make provision for a clear, realistic and sustainable path forward for the county of Meath.

Please do not hesitate to contact us should you require any clarification on any of the matters contained herein.

Yours Sincerely,



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Padraig Maguire

Senior Planner

**APPENDIX I \_ MEATH COUNTY COUNCIL PREDICTED GROWTH RATE FOR MID-EAST REGION**

<b>Mid-East</b>	<b>ESRI Population (000's)</b>	<b>Growth Rate</b>	<b>Predicted Growth Rate</b>	<b>Predicted Additional Population Growth</b>
2022	769300	1.40%	1.70%	769300
2023	780070	1.40%	1.70%	782378
2024	790991	1.40%	1.70%	795679
2025	802065	1.40%	1.70%	809205
2026	813294	1.40%	1.70%	822962
2027	824680	1.40%	1.70%	836952
2028	836226	1.40%	1.70%	851180
2029	847933	1.40%	1.70%	865650
2030	859804	0.90%	1.30%	880366
2031	867542	0.90%	1.30%	891811
2032	875350	0.90%	1.30%	903404
2033	883228	0.90%	1.30%	915149
2034	891177	0.90%	1.30%	927046
2035	899198	0.90%	1.30%	939097
2036	907291	0.90%	1.30%	951306
2037	915456	0.90%	1.30%	963673
2038	923695	0.90%	1.30%	976200
2039	932008	0.90%	1.30%	988891
2040	940397	0.90%	1.30%	1,001,746

**APPENDIX II \_ MEATH COUNTY COUNCIL PREDICTED GROWTH RATE FOR THE COUNTY**

<b>Meath</b>	<b>Population</b>	<b>ESRI Baseline Growth Rate</b>	<b>MCC Predicted Growth Rate</b>	<b>MCC Predicted Total Population</b>
2022	222300	1.10%	1.65%	222300
2023	224745	1.10%	1.65%	225968
2024	227217	1.10%	1.65%	229696
2025	229717	1.10%	1.65%	233486
2026	232244	1.10%	1.65%	237339
2027	234798	1.10%	1.65%	241255
2028	237381	1.10%	1.65%	245236
2029	239992	1.10%	1.65%	249282
2030	242632	1.10%	1.30%	253395
2031	245301	1.10%	1.30%	256689
2032	248000	1.10%	1.30%	260026
2033	250728	1.10%	1.30%	263407
2034	253486	1.10%	1.30%	266831
2035	256274	1.10%	1.30%	270300
2036	259093	1.10%	1.30%	273814
2037	261943	1.10%	1.30%	277373
2038	264824	1.10%	1.30%	280979
2039	267737	1.10%	1.30%	284632
2040	270683	1.10%	1.30%	288332