

Draft Monaghan County Development Plan
(Incorporating the Development Plans for
the Towns of Monaghan,
Carrickmacross, Castleblayney, Clones
and Ballybay)
2013-2019

Manager's Report on Submissions
Received

5th November 2012



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1.0 Introduction

The Draft Monaghan County Development Plan 2013-19 was placed on public display on 31st May 2012 for a period of ten weeks, with submissions invited up to and including 10th August 2012. This report lists the persons or bodies who made submissions, summarises the issues raised by the persons or bodies who made submissions, and gives the response of the Manager to the issues raised.

2.0 Consultation Process

The Draft Monaghan County Development Plan 2013-19 was on public display between 31st May 2012 and 10th August 2012. The draft plan was displayed in the County Council Offices, the Town Council Offices and Branch Libraries. The draft plan was also placed in the Mobile Library and was available to download from the County Council website. A Facebook Page was also created.

In addition to the statutory requirement to publish a notice of the publication of the Draft Development Plan in the local press, a news article explaining the development plan and its implications was also carried in the Northern Standard newspaper on 31st May 2012.

A series of public meetings were held in evenings at the end of June in Monaghan, Carrickmacross, Castleblayney, Clones and Ballybay to give the public an opportunity to discuss the draft plan with officials from the planning section. The following general issues were raised at the public meetings:-

- i. The Rural Area Under Strong Urban Influence surrounding Clones.
- ii. Effective control of retail development to ensure that vacant shopping centres do not happen again.
- iii. Policies to encourage reuse of derelict properties.
- iv. Sufficient quantum of Proposed Residential zonings in the towns to accommodate future population growth.
- v. Development adversely affecting the character of Bawn.

The issues raised at the public meetings have been addressed by the objectives, policies and land use zonings within the draft development plan. Issue (ii) will be further addressed through the Retail Development Strategy for County Monaghan due to be published in 2013.

3.0 List of Persons/Bodies Who Made Submissions

The following persons/bodies made submissions in respect of the Draft Monaghan County Development Plan 2013-19:-

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4.0 Summary of Submission from the Minister for the Environment, Community and Local Government and Response of the Manager

5.87	Submission Ref:	DMCDP87
	Person/Body:	Minister for the Environment Community and Local Government
	Location:	N/A
	Core Issue:	General

Points Raised

1. It is not clear to what extent the flood risk assessment has informed the development of the Core Strategy.
2. If the necessary flood risk estimation work has not yet been finalised the Department feels that it would be necessary to set out clearly in the Core Strategy a commitment to incorporate the findings where necessary in the development plan by way of a variation.
3. It would also be appropriate to indicate in the Core Strategy a commitment to applying the Department of Environment, Heritage and Local Government (DEHLG) Guidelines 'The Planning System and Flood Risk Management' Guidelines (2009).
4. The Department notes that Table 3.13 sets the amount of land required over the plan period and the anticipated housing yield. In order to contextualise the amount of zoned land required over the plan period it would be appropriate to indicate in the table the amount of residential zoned land in the current plans.
5. The DEHLG Guidelines 'Sustainable Residential Development in Urban Areas' (2009) provides the framework for achieving such development in urban areas. It would be appropriate to indicate a policy commitment to using the Guidelines as the basis for decision-making in urban areas.
6. The DEHLG Guidelines 'Sustainable Rural Housing' (2005) indicate that in rural areas under urban pressure occupancy conditions should be attached to planning permissions. It would be appropriate to indicate in the Core Strategy a commitment to managing development in rural areas in accordance with the Guidelines and the application of occupancy conditions along the lines set out in Appendix 1 of the Guidelines.
7. The 'Sustainable Rural Housing' Guidelines' (2005) also emphasise the importance of monitoring development in urban pressure areas and it is suggested that a policy be included in this regard.
8. The Department considers that it would be appropriate that Map 3.2 indicates through different symbols the hierarchical status of the towns and villages in the County.
9. Overlapping of Rural Areas under Strong Urban Influence and Stronger Rural Areas or Structurally Weak Rural Areas should be avoided.

10. The urban pressure area boundaries as indicated on maps 3.3 to 3.6 should be redrawn to reflect the highest urban pressure areas as indicated on Map 3.1. No adequate justification has been provided as to why some of the pressure areas identified on Map 3.1 have been excluded.
11. The Department notes that a review of the 2002-2012 Retail Strategy is taking place. It would be appropriate for the main policies arising from this review to be incorporated into the Core Strategy.
12. Core Strategies should have regard to the Department's Retail Planning Guidelines which were revised in April 2012.
13. The Department notes that reference is made to the Spatial Planning and National Roads Guidelines (2012). It is suggested that the draft plan contains a commitment to implement these guidelines.
14. The Department will commence a review of the 1996 'Telecommunications and Antenna' Guidelines. Consequently reference to such a revision should be included in Section 6.6.4 and the text in policy TEP6 should be amended accordingly.
15. A reference to the Departments 'Planning System and Flood Risk Management' Guidelines (2009) should be made in Section 8.4.6.
16. Policy TEP 10 should be deleted. The Department will be issuing a Circular Letter which will indicate that temporary planning permissions for telecommunications equipment should not be granted.
17. Section 15.20 deals with policies regarding access to National Roads. The Department notes that no reference is made in this section to the Department's 'Spatial Planning and National Roads' Guidelines (2012). It is suggested a policy be included which indicates that decisions regarding access arrangements onto National roads will be in accordance with these guidelines.
18. The Department suggests that appropriately word text be included within the draft plan indicating a commitment to providing data into Myplan.ie.

Response of the Manager

1. **It is recommended for the purposes of clarity that the following statement be inserted at the end of Section 3.4.6. "Of significant influence in determining the location of new development in settlements is the potential for flooding of lands either in the past or future. Although a Strategic Flood Risk Assessment for County Monaghan is currently on going, the suitability of lands for development having regard to flood risk, has been determined using preliminary information obtained from historic flood maps, information from the Office of Public Works, contour mapping and LIDAR information, site inspections, and assessment by County**

Council engineers. In addition the principles set out in the Department of Environment, Heritage and Local Government Guidelines “The Planning System and Flood Risk Management (2009)” have also been applied. This has resulted in the adoption of a precautionary approach being applied to lands which either are currently at risk of flooding or could be at risk of flooding in the future, where they have been excluded from development or restricted to development of a type that has a low vulnerability to flooding or is water compatible. The completed Strategic Flood Risk Assessment for the County will be factored into the statutory two year review of the development plan in 2015 and any necessary changes to the development plan will be progressed by way of variation.”

2. As point 1 above.
3. As point 1 above.
4. The amount of current residential zoned land is set out in the Core Strategy adopted as variation No.19 of the Monaghan County Development 2007-2013, and for this reason it is not considered appropriate to set out this information in the draft plan.
5. It is considered that Policy HDP 2 sufficiently addresses this issue.
6. Noted. Section 3.5 of the draft development plan indicates that the county has been divided into three development management zones in accordance with the Sustainable Rural Housing Guidelines”, All applications for single dwellings within Rural Areas under Strong Urban Influence must be accompanied by a completed Rural Housing Application Form (RH1 Form). Question 8 of the RH1 Form clearly states that in the event that planning permission is granted, an occupancy condition will be applied. **However, for the purposes of clarity, it is recommended that the following statement be inserted at the end of Section 3.5.1 “An occupancy condition as set out in Appendix One of the Department of Environment, Heritage and Local Government (DEHLG) Guidelines Sustainable Rural Housing’ Guidelines’ (2005) to any grant of planning permission in these areas.”**
7. **It is recommended that the following statement be inserted at the end of Section 3.5.1 “The level of development in these areas shall be monitored in accordance with the provisions of the Sustainable Rural Housing Guidelines”**
8. **It is recommended that Map 3.2 will be amended accordingly.**
9. As point 8 above.
10. It is considered that Section 3.5.1 explains adequately why the Rural Areas Under Strong Urban Influence have been mapped as indicated.
11. The Retail Development Strategy will be incorporated into the development plan by way of variation when completed.

12. It is recommended that Section 3.8 should include be sub divided into two sub sections 3.8.1 and 3.8.2 with the following statement being inserted into Section 3.8.1 “This Core Strategy has taken into account the provisions of the Department of Environment, Community and Local Government Retail Planning Guidelines 2012”.

13. The provisions of the Spatial Planning and National Roads Guidelines for Planning Authorities have been incorporated into Section 6.2.10.

14. It is recommended that Objective NRO6 is amended to read “~~Provide or Facilitate the provision of a limited number of service areas to provide for the needs of the private and commercial road user at appropriate locations along the N2 in accordance with the provisions of the DECLG Guidelines for Planning Authorities “Spatial Planning and National Roads”. and subject to normal planning considerations and the undertakings of the National Roads Authority Policy Statement on the provision of Service and Rest Areas .~~

In addition, it is recommended that the exceptions listed in the draft development plan under policies NRP1, NRP3, NRP4 and NRP5 are removed and replaced with the exceptions listed in the Spatial Planning and National Roads Guidelines, namely, developments of a National or Regional Strategic Importance or lightly trafficked sections of the National Secondary roads.

Policy NRP1 should be replaced with the following policy “Where a development of national or regional strategic importance is proposed which by its nature is most appropriately located outside urban areas, or where the location for the proposed development has specific characteristics that make it particularly suitable for the development proposed. In assessing the proposed development regard will be had to the provisions of the Department of Environment, Community and Local Government Guidelines for Planning Authorities “Spatial Planning and National Roads (2012)”

Policies NRP3, NRP4 and NRP5 should be replaced with one policy NRP3. Policy NRP3 should state” Where a development which has no suitable alternative non-national public road access, is proposing to access onto a lightly-trafficked section of national secondary road* which serves a structurally weak area.

**Traffic volumes are low and are forecast to remain below 3,000 AADT (as verified by the NRA) for the next 20 years”*

The remaining Policies NRP6 and NRP7 being renumbered NRP4 and NRP5 respectively.

15. It is recommended that the following sentence is added into Section 6.6.4 and Policy TEP6 in Chapter 15 be amended to state “All proposals for

telecommunication apparatus shall be assessed against the policies laid out in the DEHLG's Telecommunications Antennae and Support Structures, Guidelines for Planning Authorities (1996) *or any such guidelines which supersedes it*".

16. Noted. A reference to the Departments 'Planning System and Flood Risk Management' Guidelines (2009) will be made in Section 8.4.6.

17. It is recommended that policy TEP10 is removed from the development plan to comply with Circular PL 07/12 issued by the Department of Environment, Community and Local Government in October 2012.

18. It is recommended that mention of the DECLG Guidelines "Spatial Planning and National Roads" (2012) be inserted into Section 15.21.

It is also recommended that the exceptions listed in the draft development plan under policies NRP1, NRP3, NRP4 and NRP5 are removed and replaced with the exceptions listed in the Spatial Planning and National Roads Guidelines, namely, developments of a National or Regional Strategic Importance or lightly trafficked sections of the National Secondary roads.

Policy NRP1 should be replaced with the following policy "*Where a development of national or regional strategic importance is proposed which by its nature is most appropriately located outside urban areas, or where the location for the proposed development has specific characteristics that make it particularly suitable for the development proposed. In assessing the proposed development regard will be had to the provisions of the Department of Environment, Community and Local Government Guidelines for Planning Authorities "Spatial Planning and National Roads (2012)"*

Policies NRP3, NRP4 and NRP5 should be replaced with one policy NRP3. Policy NRP3 should state" *Where a development which has no suitable alternative non-national public road access, is proposing to access onto a lightly-trafficked section of national secondary road* which serves a structurally weak area.*

**Traffic volumes are low and are forecast to remain below 3,000 AADT (as verified by the NRA) for the next 20 years"*

The remaining Policies NRP6 and NRP7 being renumbered NRP4 and NRP5 respectively.

19. As the planning authority is committed to the implementation and updating of myplan.ie, it is not considered necessary to incorporate a commitment within the development plan.

5.0 Summary of Submissions from Other Bodies/Persons and Response of the Manager

5.1 Submission Ref: DMCDP1

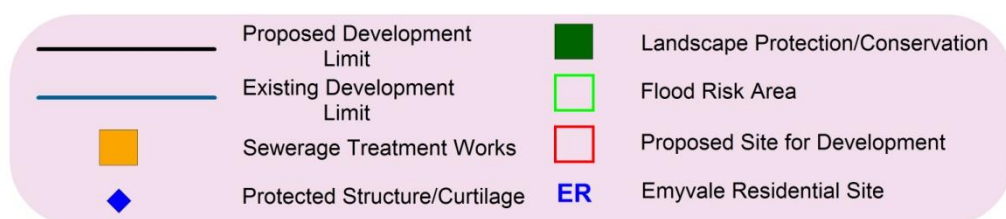
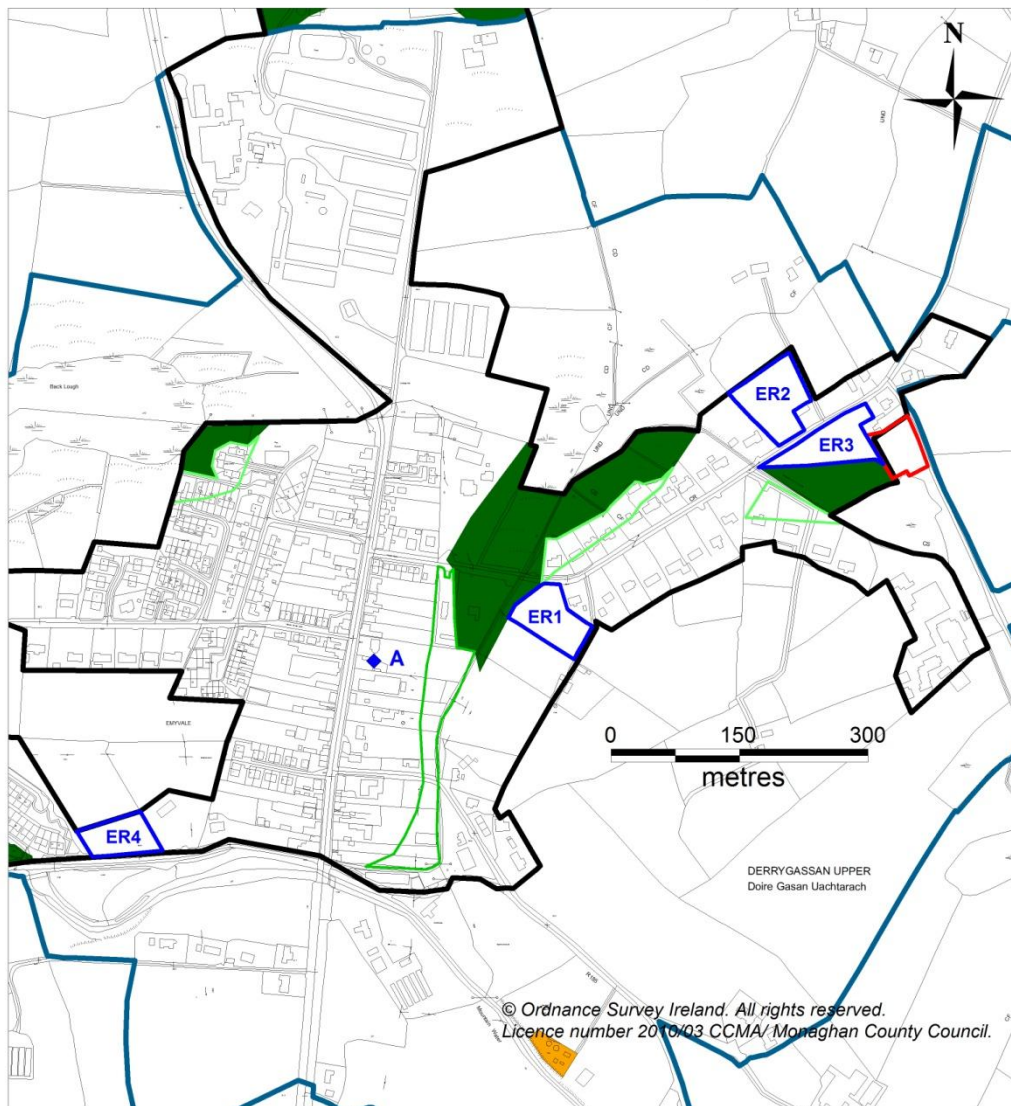
Person/Body: Hugh Treanor

Location: Emyvale – Refer to Map DMCDP1

Core Issue: Zoning of Lands for Housing

Emyvale (Map DMCDP1)

Draft Monaghan County
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Development Constraints - EMYVALE

(A) Magee Meats (Protected Structure)

Points Raised

1. Mr Treanor obtained planning permission for housing on the subject lands under permissions ref. 07/1582 and 09/447.
2. The subject lands are currently within the serviced zone envelope for the existing village and within the 50kph limit.
3. More than €130,000 has already been invested on the provision of planning and physical infrastructure to serve the development including excavation works, hardcoring, electricity and telephone services, waste water equipment, and €40,000 of development contributions.
4. There has been a number of enquiries by local parties for a site for a family residence and demand will intensify when normal mortgage lending resumes.
5. Mr Treanor can't understand the logic of the planning authority to re-zone the subject lands previously sanctioned for development given its proximity to the existing village settlement.
6. There is a remote possibility of residential development taking place on the land closer to the village on Mullan Road identified in the draft plan for proposed housing as ownership is split and there are access difficulties which prevented the sale of the lands previously.
7. There are no other comparative development opportunities on the environs of the village settlement which are ready for the development of larger than normal detached family homes.
8. Lower density development in the form of small scale cluster type residential development should be facilitated where conveniently located to village settlements as they would offer an alternative to one off rural houses in the surrounding countryside.
9. The subject lands should be included within the new zoning envelope.

Response of the Manager

1. Noted. These permissions expire on 13th December 2012 and 12th January 2015 respectively.
2. Section 10(8) of the Planning and Development Acts 2000-2010 specifically states "*There shall be no presumption in law that any land zoned in a particular development plan (including a development plan that has been varied) shall remain so in any subsequent development plan*"
3. Noted.
4. Noted.
5. The Planning and Development Act 2010 required the inclusion of a Core Strategy within development plans, which dictates that lands should be zoned for residential development based on demand and sequential location. The Core Strategy incorporated within the

draft County Development Plan has determined the quantum and location of residential lands required during the period of the development based on projected population growth and the sequential approach to land use zoning as stipulated in the Department of Environment, Community and Local Government Guidance Note on Core Strategies, the Development Plan Guidelines and the Sustainable Residential Development in Urban Areas Guidelines published by the Department, and Chapter Five of the National Spatial Strategy.

6. As point 5 above. To address issues of unavailability of zoned land for development, the quantum of land suitable for residential use included within the settlement envelope of Emyvale is 150% (ie. 2.6 hectares) of that required to fulfil the projected population growth in the village over the period of the development plan. It is considered that this quantum is highly unlikely to be developed over the lifetime of the plan.
7. There are similar sized plots of land within the proposed settlement envelope that would be suitable for this type of housing. These are indicated as ER1, ER2 and ER3 on Map DMCDP1.
8. It is considered that this type of development could contribute to ribbon development and urban sprawl, and thus would not be an appropriate form of development. Larger detached family homes located on spacious plots within the settlement envelopes of villages such as Emyvale would be the most appropriate form of development as an alternative to one off housing on the edge of villages.
9. **For the reasons set out in points 5, 6 and 7 above the lands should be excluded from the settlement envelope of Emyvale. However, should the elected members decide to include the subject lands within the settlement envelop, it will be necessary to exclude a parcel of land from the settlement limits in lieu of it. It is suggested that the elected members consider plot ER4 (Refer to map DMCDP1 above) given that it has significant topographical gradients which would result in it being difficult to develop.**

5.2 Submission Ref: DMCDP2

Person/Body: Dermot McCabe

Location: Clones

Core Issue: Development of Clones

Points Raised

1. Re-open The Great Northern Railway for passenger and freight services.
2. Re-open The Ulster Canal.
3. Re-open the shops in Fermanagh Street.
4. Start new industries in Clones.
5. Open a Town Museum in the Old County Library.
6. Rebuild The Workhouse.
7. Build a greyhound stadium in Clones.
8. Open the toilets at the back of the Old Library and Courthouse as public toilets.
9. Create employment in Clones.
10. Get rid of the regime that is running the town as they object to development or new business in the town.
11. Undertake an archaeological dig of Clones Town.
12. Install natural gas in Clones.
13. Build a camping and caravan park for tourists.
14. Use the old library as council offices and a Town Hall theatre.
15. Open all the shops in Clones.
16. Bring new factories and industry to Clones Town.
17. Undertake a major drainage operation in County Monaghan
18. List old houses and buildings in the towns and villages for preservation including St Joseph's Hall Clones.

Response of the Manager

1. The reopening of the Great Northern Railway is outside the remit of the Development Plan, however, the draft plan does contain objectives for the protection of the built fabric of the Great Northern Railway.
2. The reopening of the Great Northern Railway is outside the remit of the County Development Plan, however, the draft plan does contain objectives for the protection of the built fabric of the Ulster Canal, and objectives to encourage the reopening of the Ulster Canal and the development of facilities associated with the canal.
3. The reopening of the shops in Fermanagh Street is outside the remit of the Development Plan, however, the draft plan does contain objectives to encourage the regeneration of

Fermanagh Street and the refurbishment, renewal and reuse of existing buildings and derelict sites.

4. The development of new industries in Clones is outside the remit of the Development Plan, however, the draft plan does contain objectives to promote new industrial development in appropriate locations, to co-operate with the Industrial Development Authority, Enterprise Ireland, Forbairt, Forfas, Intertrade Ireland, the County Enterprise Board and other such relevant bodies. The draft development plan also contains objectives to ensure suitably serviced sites are accommodated in appropriate locations and zones land for industry, enterprise and employment at various locations around Clones.
5. This matter is outside the remit of the Development Plan.
6. This matter is outside the remit of the Development Plan.
7. This matter is outside the remit of the Development Plan.
8. This matter is outside the remit of the Development Plan.
9. As point 4 above.
10. This matter is outside the remit of the Development Plan.
11. This matter is outside the remit of the Development Plan.
12. This matter is outside the remit of the Development Plan.
13. The building of a camping and caravan park for tourists is outside the remit of the Development Plan, however, the draft plan does contain objectives and policies to encourage tourism and associated facilities.
14. This matter is outside the remit of the Development Plan.
15. The reopening of the all the shops in Clones is outside the remit of the Development Plan, however, the draft plan does contain objectives to encourage the development of the town centre and the refurbishment, renewal and reuse of existing buildings.
16. As point 4 above.
17. This issue is outside the remit of the Development Plan.
18. It is considered that Objective PSO2 in Chapter Four sufficiently addresses this issue.

5.3 Submission Ref: DMCDP3

Person/Body: Terence Buckley

Location: Annyalla

Core Issue: 100m Separation Between Residential Units and Agricultural Buildings

Points Raised

1. The requirement to get written consent from the owner of the agricultural buildings to construct residential units within 100 metres of the buildings does not facilitate development in villages.
2. Consent is not forthcoming when the parties do not agree with each other.
3. Mr Buckley owns the Old National School and Buckley's Shop in Annyalla. These are vacant at present and the Mr Buckley is prevented from developing them into residential units because the owner of agricultural buildings within 100 metres of them will not give consent to their development.
4. The village of Annyalla and many other villages in Monaghan would not extend much more than 100 metres in each direction and therefore agricultural buildings around it are likely to adversely affect proposals for residential development.
5. There is no much point in designating villages, encouraging development within them and then having a policy which could prevent residential development.
6. Mr Buckley proposes that the policy requesting the consent of the owners of agricultural buildings to residential development within 100 metres of their building be removed in the case of villages.
7. Mr Buckley's property is only 25 metres away from a shed which has not been used to house livestock at present or for some time.

Response of the Manager

1. Noted.
2. Noted.
3. Noted.
4. Noted.
5. Noted.
6. **It is recommended that Policy RDP16 be retained in its current form to ensure that the amenity of proposed residential developments is protected, and to ensure that residential developments within 100 metres of existing agricultural enterprises do not pose a threat to the viability of these enterprises.**
7. Noted.

5.4 Submission Ref: DMCDP4

Person/Body: M Vance

Location: Clones

Core Issue: Urban Sprawl / Ribbon Development

Points Raised

1. Agrees with proposals to restrict development in the environs of Clones to preserve the countryside.
2. People have no respect for the countryside, many new houses don't have cattle grids and new residents complain about day to day farming activities.
3. New houses are generally not discreet and have destroyed the scenery.
4. New rural dwellers allow their dogs to roam free to the detriment of farm animals and wildlife.
5. Septic tanks may not work properly and new wells can adversely affect established sources of water supply.

Response of the Manager

1. Noted.
2. This matter is outside the remit of the Development Plan.
3. The draft development plan contains objectives and policies to ensure that new development is properly integrated into the countryside.
4. This matter is outside the remit of the Development Plan.
5. The draft development plan contains objectives and policies to ensure that new on site effluent disposal systems in the countryside meet the standards set out by the Environmental Protection Agency.

5.5 Submission Ref: DMCDP5

Person/Body: Eileen McNally
Location: Annyalla
Core Issue: Landscape Protection

Points Raised

1. The area Ms McNally lives in is very picturesque and has remained unspoilt for the past couple of centuries. Our landscape is unique and should be protected from intrusive development.
2. Cashel Bog, Lough Nahinch and their environs are a haven for wildlife and should be protected from commercial development.
3. Cashel Bog has been untouched since the 1950s, is regenerating and should be protected by a preservation order.

Response of the Manager

1. Noted and agreed. The draft development plan contains objectives and policies to protect the countryside and the landscape from intrusive development and designates specific landscapes for protection.
2. Noted. The draft development plan contains objectives and policies to protect both designated and undesignated wildlife habitats.
3. Noted. The draft development plan contains objectives and policies to protect wetlands from destruction, infilling, fragmentation and degradation. The Monaghan Fen Survey of 2008 recommended that Cashel Bog and Corlea Bog be designated as National Heritage Areas. It is a matter for the Department of Heritage, Arts and Gaeltacht to designate National Heritage Areas.

5.6 Submission Ref: DMCDP6

Person/Body: Inland Fisheries Ireland (North Western River Basin District)

Location: N/A

Core Issue: Protection of Aquatic Habitats

Points Raised

1. Submission sets out responsibilities of Inland Fisheries Ireland (IFI) and its mandate to protect the fisheries of the State.
2. The development plan in considering the protection of the aquatic environment must address the protection of the physical environment, hydrological processes and biodiversity as well as water quality.
3. Steady pollution over time is more problematic than dramatic cases of pollution because it reduces growth, inhibits reproduction and alters the habitat for species.
4. Maintenance of aquatic habitats is important and entails protection of each stage of the food chain.
5. The EU Water Framework Directive (2000/60/EC) requires the protection of the ecological status of river catchments and one of the primary objectives of it is to prevent further deterioration and to enhance the status of aquatic systems.
6. Sufficient treatment capacity must be available both within the receiving sewerage systems and downstream of waste water treatment plants (WWTPs) over the duration of the plan, and a comprehensive and robust assessment of both local infrastructural needs and local authority capacity to meet those needs is important.
7. There is a risk of significant environmental impacts from development discharging to WWTPs with insufficient capacity during the life of the plan.
8. It is not sustainable to grant planning permission for development discharging to inadequate or overloaded WWTPs as it has adverse impacts upon the well being and quality of rivers, and thus planning permission should either be refused in these cases or alternatively an on site package treatment plant installed with the development prevented from connecting to the WWTP until it has the capacity to accept the loading.
9. IFI welcomes proposals to install integrated constructed wetland systems (ICWS) provided they are properly designed, installed and operated in accordance with the 2010 Department of Environment, Heritage and Local Government publication "*Integrated Constructed Wetlands Guidance Document for Farmyard Soiled Water and Domestic Wastewater Applications*"
10. Farms must be required to provide safe and secure storage of animal manures, slurries, silage effluent, dairy wastes and soiled waters, and clean water from roofs and yards should be kept out of effluent and waste holding facilities.

11. The implications of surface water abstraction to sustain ICWS in periods of dry weather must be considered as this may reduce the assimilative capacity of the watercourse.
12. Abstractions from water courses during dry weather or drought periods can have serious implications for aquatic habitats.
13. A policy in relation to aquatic protection should be included in the development plan as current planning regulations do not sufficiently address watercourse protection and management, and the impact of developments such as roads, flood relief, afforestation and river drainage upon the aquatic environment will only be apparent in the long term.
14. Drainage, culverting, alteration and diversion of water courses, and modification of flood plains to accommodate development and increased run off from impermeable surfaces have significant impacts upon aquatic habitats.
15. Consideration has to be given to factors such as flow, drainage, dams, bank erosion, instream vegetation and riparian habitat.
16. Development can result in the destruction of instream habitats, interference with fish spawning and nursery areas, obstruction of fish passages, removal of angling pools, changes inflow regimes, fragmentation of riparian habitat within the river corridor, and loss of cover for fish and aquatic animals.
17. Open watercourses provide corridors for fish and wildlife movement and are important in amenity terms, but are often realigned or culverted in built up areas as they pose an obstacle to development resulting in the loss of this corridor.
18. Consideration should be given to the protection of riparian corridors in the development plan in the same manner as tree preservation orders, to ensure benefit for future generations.
19. Areas adjacent to waterways (riparian buffer zones) must be managed so as to lessen impacts upon aquatic habitats.
20. Riparian buffer zones comprise of a vegetated area between the land and a freshwater body and plays a key role in protecting/improving water quality and have become a common conservation measure.
21. Riparian buffer zones must be sufficiently wide to protect watercourses and could be up to 50 metres wide depending on land use, topography, soil type, channel width/gradient and habitats to be protected.
22. Many local authorities have included specific policies in their development plans to reserve riparian buffer zones free from inappropriate development along stream/river banks to provide habitats, river maintenance, angling access, walking, recreation and pollution control, and to maintain such corridors.

23. IFI urges all local authorities to protect riparian habitats and should be consulted in relation to development that could potentially impact upon aquatic ecosystems and riparian habitats.
24. IFI is opposed to any development on flood plains or which would interfere with natural flood plains.
25. The development plan should include policies to ensure that developments do not lead to the spread of invasive species.
26. Poorly designed river/stream crossing structures can result in habitat loss, prevent fish migration, and result in loss of spawning habitats, and the design of crossing structures should consider fish movements with bridges and bottomless culverts having least impact.
27. IFI recommends that the development plan should include a clear policy on the use of clear span structures where possible and be consulted with proposals for crossing structures.
28. The development plan is an opportunity to promote policies and awareness of water conservation.
29. Water conservation and use efficiency are central to water supply reliability, ecosystem restoration, demographic change and climate change response.
30. Best practice in water conservation such as rain water harvesting, should be promoted.
31. Water conservation and water use efficiency requires action by all water users.
32. The inclusion of policies in respect of Sustainable Urban Drainage Systems (SUDS) in the development plan is recognised and should be a requirement in all development proposals.
33. River management policies should be an integral part of the development plan and all waterways should be considered as a natural resource requiring protection and development.
34. River Corridor Management Areas, Special Preservation Orders and Special Amenity Areas to protect the aquatic environment and specific habitats, and provide linear parks should be included in the development plan.
35. A watercourse should be considered in relation to its existing aesthetic, amenity and recreational value, and the potential for improvement and protection.
36. Rivers and watercourses are visual and amenity features which can be incorporated into developments as landscape features and can be a focus for community involvement.
37. As the 1997 Habitats Directive and Special Areas of Conservation Directive do not include all aquatic habitats, the development plan must provide for the maintenance and preservation of all watercourses and associated riparian habitats.
38. Consideration should be given to the sustainable development of inland fisheries and the impacts upon water quality, aquatic and associated riparian habitats, biological diversity,

ecosystem structure and functioning, fish spawning and nursery areas, surface water hydrology, passage of migrating fish, areas of natural heritage importance, sport and commercial fishing, and amenity and recreation areas.

39. The development plan must be consistent with the River Basin Management Plans, and comply with the EU Water Framework Directive.
40. IFI advocates a change from accepting river corridor interference to an assumption against it.

Response of the Manager

1. Noted.
2. The draft development plan contains objectives and policies to protect aquatic environments including the physical environment, hydrological processes and biodiversity as well as water quality.
3. Noted and agreed.
4. Noted and agreed.
5. Noted and agreed.
6. The draft development plan contains an assessment of the capacity of all public waste water treatment plants in the county and proposals to increase capacity during the period of the development plan where necessary.
7. Noted and agreed. The draft development plan contains policies to prevent development connecting to public WWTPs where there is insufficient capacity to treat the additional loading generated by the development.
8. Noted and agreed. The draft development plan contains policies to prevent development connecting to public WWTPs where there is insufficient capacity to treat the additional loading generated by the development.
9. **It is recommended that an additional policy (Policy ETP 6) be included within Section 15.8 of the development plan as follows:-**
Where an integrated constructed wetland system is proposed as part of an effluent treatment system, it shall be designed, constructed and operated in accordance with the 2010 Department of Environment, Heritage and Local Government publication “Integrated Constructed Wetlands Guidance Document for Farmyard Soiled Water and Domestic Wastewater Applications”
10. The draft development plan contains objectives and policies to dispose of agricultural wastes in a safe, efficient and sustainable manner including the use of sustainable urban drainage systems.
11. Noted.
12. Noted.

13. The draft development plan contains objectives and policies to address watercourse protection and management.
14. Noted.
15. Noted.
16. Noted.
17. Noted.
18. The draft development plan contains an objective to designate riparian zone protection areas where necessary.
19. Noted and agreed.
20. Noted and agreed.
21. Noted.
22. The draft development plan contains objectives and policies to protect riparian corridors.
23. Noted and agreed. The draft development plan contains objectives and policies to protect riparian corridors.
24. The draft development plan contains objectives and policies to protect flood plains from interference and has designated such as areas as Landscape Protection/Conservation Areas within settlements to protect their status.
25. The draft development plan contains an objective to ensure that development proposals do not lead to the spread of invasive species.
26. Noted and agreed.
27. The draft development plan contains a policy to prevent any instream works unless in accordance with IFI guidelines. There is also a requirement to consult IFI when works are proposed close to waterways. It is recommended that this policy (WPP 6) be amended to include a requirement to use clear span structures, where possible, for proposed crossings over riparian corridors.
28. Noted and agreed.
29. Noted and agreed.
30. The draft development plan contains objectives and policies requiring the use of sustainable urban drainage systems.
31. Noted and agreed.
32. Noted and agreed.
33. Noted and agreed. The draft development plan contains objectives and policies to protect rivers in terms of water quality, biodiversity, physical structure and amenity.
34. The draft development plan contains objectives and policies to protect riparian corridors. The draft development also contains objectives and policies to protect habitats and implement the Monaghan Biodiversity Action Plan 2009-2014, and to develop a Green Infrastructure Strategy.

35. Noted and agreed. The draft development plan contains objectives and policies to protect rivers in terms of water quality, biodiversity, physical structure and amenity.
36. Noted and agreed. The draft development plan contains policies to incorporate existing features into developments where possible.
37. The draft development plan contains objectives and policies to protect rivers in terms of water quality, biodiversity, physical structure and amenity.
38. As point 37 above.
39. It is considered that the objectives and policies within the draft development plan ensure it is consistent with the River Basin Management Plans, and complies with the EU Water Framework Directive.
40. Noted and agreed. The draft development plan contains objectives and policies to protect rivers in terms of water quality, biodiversity, physical structure and amenity.

5.7 Submission Ref: DMCDP7

Person/Body: Border Regional Authority

Location: N/A

Core Issue: Various

Points Raised

1. Acknowledges the work carried out by Monaghan County Council and the Town Councils in preparing the draft development plan.
2. Details the previous submissions made by the Border Regional Authority
3. It is acknowledged that the draft development plan had to use provisional figures from the 2011 Census. However, up to date figures and data should be incorporated within the development plan before its adoption.
4. The Environmental Report is an excellent document and both it and the Natura Impact Report provide a significant evidence base to develop an appropriate framework, strategy and relevant policies and objectives to ensure the County develops in a sustainable manner.
5. It is important that the key issues and particular environmental pressures are central to the development of a revised plan and appropriate policies and objectives are developed to address these issues.
6. The Council should revisit the requirements of the Strategic Environmental Assessment Directive in respect of transboundary consultation to ensure that all necessary procedures and actions are taken.
7. The future growth of the county should be based on existing and future infrastructure provision, particularly water and waste water services.
8. The most recent information in respect of the capacities of waste water treatment plants in each of the settlements in the county should be provided in table 6.7 of the draft Development Plan and Table 17 of the Environmental Report.
9. The Natura Impact Report includes a significant amount of information on the Natura 2000 network within and adjoining County Monaghan. It would appear that the relevant process and procedures have been followed in the drafting of this report.
10. A Strategic Flood Risk Assessment (SFRA) is required to inform the development plan of flooding risks, however, there is little detail as to where and what the risks may be throughout the county. Although the Catchment Flood Risk Area Maps will not be released until 2015, all other sources of information should be utilised.
11. The draft development plan is well written and structured and includes all the key objectives outlined in the document *Development Plans – Guidelines for Planning*

Authorities published by the Department of Environment, Heritage and Local Government in 2007 and in the Planning and Development (Amendment Act) 2010.

12. The regional policy context outlined in Section 1.6 of the draft plan should be amended to include the broader context of the Regional Planning Guidelines for the Border Region (RPGs) with reference being made to the regional growth model identified in Map 3.1 of the RPGs. Map 1.2 in the draft plan should be updated accordingly.
13. The relevant details of the draft Sustainable development Strategy Framework for Ireland should be included in Section 1.4.1 of the draft plan.
14. The potential housing yield for Tiers 5 and 6 and the rural area should be included in Table 3.13 of the Core Strategy in the draft plan, particularly as Tier 5 settlements may accommodate multiple residential units which could provide a significant housing supply in the county over the plan period in excess of the combined figures for the remaining settlements in the county
15. Population must be accommodated within settlements that have capacity to absorb additional development and provide a viable alternative to one off housing in the countryside.
16. A cap on the number of residential units that may be permitted in Tier 5 settlements may be a way of providing controlled and structured future development in these villages.
17. Map 3.2 is acknowledged as fulfilling the requirements of the 2010 Planning Act and is of great assistance in highlighting spatial distribution and hierarchy of settlements throughout the county.
18. Although the Environmental Report identifies that the proliferation of rural housing in the county has implications for surface and ground water supplies, it is not clear how the revised housing policy has been determined with regard to water quality and particularly sensitive areas. Section 3.5 should be amended to include issues emerging from the relevant River Basin Management Plans and other sources of information on water quality.
19. A map identifying areas where water quality is sensitive should be created using the information on maps 4.1, 4.2, 4.3, 4.4, 4.5 and 4.6 in Chapter Four of the draft plan.
20. Both the Environmental Report and the Draft plan indicate a decline in the population of the urban centres and growth on the environs of the towns. However, it is not clear how these issues are being addressed in the revised development plan. The Council should review urban and rural housing policy to ensure that the issues and problems highlighted in the Environmental Report are adequately addressed by policy.
21. The Department of Environment, Community and Local Government report “Progress Report on Actions to Address Unfinished Housing Developments” should be considered within the Core Strategy

22. Those developments listed in the development zoning matrix as being acceptable on Strategic Residential Reserve should be restated as being open for consideration, as the Strategic Residential Reserve should only be released when the conditions specified in the draft plan are met.
23. The key emerging sectors identified in the Regional Economic Strategy of the Regional Planning Guidelines for the Border Region are correctly identified in the Economic Activity chapter of the draft plan. It is critical that land use planning facilitates the sustainable development of new emerging sectors and facilitates expansion of existing sectors in the current economic climate. The development of a good spatial distribution of settlements of sufficient critical mass to provide a wide range of services identified in the settlement hierarchy is noted.
24. The data provided in Chapter Five is outdated and the publication of the employment and economic data by the Central Statistics Office in July 2012 would be useful in updating this chapter. The Regional Economic Strategy in the Regional Planning Guidelines, the Regional Competitiveness Agendas drafted by Forfas, the Economic Statistical Research Institute publications and the All Island Research Observatory all provide more up to date information.
25. The Interreg Programme should be mentioned in Section 5.4.2 of the draft plan in addition to the Peace Programme.
26. The Retail Development Strategy for County Monaghan currently being prepared should be finalised in parallel with the development plan.
27. County Monaghan could benefit further from Tourism and many of the County's natural resources should be seen as assets and not constraints to development. Map 4.7 of the draft plan identifies many tourist assets as constraints. This map should be developed to provide a new map of tourist assets.
28. The infrastructure led approach in the draft plan is welcomed as it is critical to the sustainable development of the county. However, given the nature and type of environmental pressures identified in the Environment Report, consolidation of new and existing development is required to minimise the need to travel, encourage a modal shift to public transport, to encourage cycling and walking and to protect existing and proposed investment in public infrastructure. The draft plan should include a statement to this effect.
29. The Council should review the infrastructure priorities outlined in Chapters One and Five of the Regional Planning Guidelines, particularly the proposals for the N2/A5 road which forms part of the Northern Cross in the Regional Planning Guidelines and thus should be referenced within the transport and roads sections of the draft plan.
30. A policy should be included to develop a transportation implementation plan during the lifetime of the plan, which will highlight priority schemes for development and

improvement, and thus facilitate an integrated and planned approach to the improvement and development of new transportation infrastructure.

31. The development of the transmission grid is significant and all cross border infrastructure should be included within the draft plan to ensure that connectivity and sharing of services are considered. An overarching policy should be considered within the development plan to ensure its implementation.
32. All policies on energy and gas in the development plan should be cross referenced and consistent with the strategic energy policy INFP23 in the Regional Planning Guidelines.
33. All references to the Regional Development Strategy for Northern Ireland should mention the most recent version published in March 2012 and include relevant detail and information from it.
34. The wording of policies and objectives in the draft plan should be consistent with those outlined in the Environmental Report.
35. The public transport routes included on Map 3.7 should be amended to make them more easily identifiable.
36. It is not clear the categories of development that policy PAP2 in the draft plan excludes from being exempted development.
37. A timescale needs to be given for the production of the Land Use Transportation Strategy, maps of public rights of way in the County, and the Design Guide for Rural Housing.
38. Although the population, housing and housing land requirement figures in the Core Strategy are generally consistent with the Regional Planning Guidelines, full compliance with the Planning and Development Act 2000 will be achieved through the recommendations set out in the Border Regional Authority submission.

Response of the Manager

1. Noted.
2. Noted.
3. The final population figures for the Tier 1, 2, 3 and 4 settlements set out in the Census 2011 data have been reviewed, and it is considered that the target population growth for these settlements over the period 2011-2019 as set out in Table 3.13 of the Core Strategy is generally in keeping with the growth pattern of these settlements over the period 2006-2011. Where there is some discrepancy, it is considered that the target population growth still represents the likely growth scenarios for the settlement as it is based on growth patterns over a 15 year period and not the five year period of the last census. The target population growth will be subject to review under the statutory two year review of the development plan in 2015.
4. Noted.

5. Noted and agreed.
6. It is considered that the necessary procedures and actions in respect of transboundary consultation have been undertaken.
7. Noted and agreed.
8. The most recent information in respect of the capacities of waste water treatment plants in each of the settlements in the county is provided in table 6.7 of the draft Development Plan and Table 17 of the Environmental Report.
9. Noted and agreed.
10. A Strategic Flood Risk Assessment is currently being prepared for County Monaghan. Preliminary information obtained from the Historic Flood Maps, the Office of Public Works Benefitting Lands Maps, site visits and verified local knowledge has informed the draft development plan. This has resulted in the adoption of a precautionary approach to lands which either are currently at risk of / have the potential to cause flooding or could be at risk of / have the potential to cause flooding in the future. The completed Strategic Flood Risk Assessment will be factored into the statutory two year review of the development plan in 2015 and any necessary changes to the development plan will be progressed by way of variation.
11. Noted and agreed.
12. **It is recommended that reference be made to the broader context of the Regional Planning Guidelines for the Border Region in Section 1.6 and that the regional growth model identified in Map 3.1 of the RPGs be included. Map 1.2 in the draft plan be replaced with Map 3.1 in the RPGs and the following shall be inserted in Section 1.6 “*The RPGs for the Border Region provide a strategic planning framework and sets out to deliver the following key strategic goals:-***
 - *To foster the development of the Region’s most important asset, its people by providing an improved quality of life for all people and communities living, working and visiting the Region.*
 - *To ensure the development of the Gateways, Hubs, Drogheda and Carrick-on-Shannon as the strategic drivers of growth for the Region and to facilitate integrated sustainable development between urban and rural areas;*
 - *To improve intra and inter regional connectivity and mobility throughout the Region through the development of Strategic Radial Corridors and Strategic Links;*
 - *To promote innovation, economic growth, competitiveness and the development potential of the Region, and to facilitate emerging sectors in the Region that will provide sustainable jobs for the future;*

- *To protect and enhance the quality of the natural environment and built heritage of the Region;*
 - *To co-ordinate a regional approach to the key environmental challenges facing the Region;*
 - *To co-ordinate and integrate key issues in National and Regional Spatial Planning Strategies and in particular, the National Spatial Strategy and the National Development Plan, and associated inter-regional development initiatives that support and promote strategic links;*
 - *To co-ordinate and integrate key aspects of cross border spatial planning strategies, and in particular, the Regional Development Strategy for Northern Ireland and associated inter-regional development initiatives, that support and promote strategic links between the two economies.*
 - *To exploit the Regions unique location at the interface between two economies, by putting in place the drivers for economic growth, through the development of the Eastern Corridor, Atlantic Arc and the Central Border Area*
13. The relevant details of the draft Sustainable Development Strategy Framework for Ireland should be included in Section 1.4.1 of the draft plan. The following shall be inserted at the end of Section 1.4.1 *“The draft Sustainable Development Strategy Framework for Ireland concentrates on gaps in integrating sustainable principles into public policy making in Ireland across a range of economic, social and environmental policy areas where limited progress has been made and which still present formidable challenges. Drawing on the model established by the EU Sustainable Development Strategy, the draft Framework for Sustainable Development formed a central element of Ireland’s contribution to the UN Conference on Sustainable Development (Rio+20) in Rio de Janeiro, Brazil in June 2012, the objective of which was to secure renewed political commitment for sustainable development, assess the progress to date and identify the remaining gaps in the implementation of the outcomes of the major summits on sustainable development. The objectives of the draft Framework are to identify and prioritise policy areas and mechanisms where a sustainable development approach will add value and enable continuous improvement of quality of life for current and future generations and set out clear measures, responsibilities and timelines in an implementation plan. This draft Framework includes matters such as conservation and management of natural resources, climate change and clean energy, sustainable agriculture, sustainable transport, social inclusion, and sustainable communities and spatial planning.”*

- 14. It is recommended that the potential housing yield of 1868 units for Tiers 5 and 6 and the rural area be included in column 5 of Table 3.13 of the Core Strategy in the draft plan.**
15. Noted and agreed.
16. It is considered that a cap on the number of residential units that may be permitted in Tier 5 settlements is not necessary as there are restrictions on the size and scale of residential developments in these settlements which have the effect of limiting the amount of dwellings that can be permitted within them.
17. Noted.
18. Section 3.5 of the Core Strategy indicates those rural areas that are experiencing development pressure in the form of rural housing, and facilitates categorisation of those areas where the capacity for rural housing is limited and those areas that have capacity for rural housing. Chapter Four of the draft development plan sets out those areas in the county that have sensitive surface waters, sensitive ground waters, areas of ground water vulnerability, and aquifer protection areas. Policies WPP1, WPP2, WPP5, WPP6, WPP8 - WPP12 have been specifically included into the draft development plan to seek to protect surface and ground water. Assessment of the impact of rural housing upon ground water and surface water and thus its acceptability will be assessed on a case by case basis based on the objectives and policies in Chapter Four and the information set out in Maps 4.1, 4.2, 4.3, 4.4, 4.5 and 4.6.
19. It is considered that the creation of a map containing all the information set out in Maps 4.1, 4.2, 4.3, 4.4, 4.5 and 4.6 would be difficult to read given the number of layers of information that would be over laid on it.
20. The draft development plan contains policies and objectives to limit the amount of residential development on the environs of towns to local rural generated housing and sufficient land has been zoned for residential development within the towns to offer opportunities for a range of housing tenure in the towns. The draft plan also contains policies to protect surface and ground waters and to protect the landscape from visually unacceptable development.
21. The Department of Environment, Community and Local Government report "Progress Report on Actions to Address Unfinished Housing Developments" has been considered in relation to the Core Strategy.
- 22. It is recommended that those developments listed in the development zoning matrix as being acceptable on Strategic Residential Reserve should be restated as being open for consideration (Refer to Appendix One).**
23. Noted and agreed.
- 24. It is recommended that the economic data provided in Chapter Five be up dated.**

25. It is recommended that the Interreg Programme should be mentioned in Section 5.4.2 of the draft plan. The following should be inserted as Section 5.4.3 *“Interreg is an initiative that aims to stimulate cooperation between regions in the European Union. It began in 1989, and is financed under the European Regional Development Fund (ERDF). The current programme is Interreg IV, covering the period 2007–2013. The Programme’s two key priorities are co-operation for a more prosperous cross-border region, and co-operation for a sustainable cross-border region. Monaghan Local Authorities have obtained funding for projects such as Castleblayney and South Armagh (CASA) and Clones Erne East Blackwater (CEEB). The CASA project seeks to promote awareness of the CASA region, provide enterprise units in Ballybay, and develop facilities at Lough Muckno and Slieve Gullion. The CEEB project seeks to provide infrastructural development works in rural villages and towns along the Ulster Canal Corridor between Clones and Lough Erne, to provide circular walking/cycling routes and eco-trails on Slieve Beagh and East Fermanagh, to provide basic angling infrastructure in the Erne East area, to develop a training and mentoring programme for twenty businesses, and to develop a cross border integrated marketing programme.”*
26. A revised Retail Development Strategy for County Monaghan is due to be published in early 2013.
27. This is outside the remit of county development plan.
28. It is recommended that the following statement be inserted at the end of Section 6.1 of the draft development plan *“Key to the effective provision of infrastructure and services in the county is the consolidation of new and existing development. This will minimise the need to travel, encourage a modal shift to public transport, and cycling and walking, will protect existing and proposed investment in public infrastructure and will ensure that infrastructure and services are delivered in an effective manner.”*
29. It is recommended that the proposal for the realignment of the N2/A5 road which forms part of the Northern Cross in the Regional Planning Guidelines be referred to in Section 6.2.10 of the draft plan.
30. It is recommended that Objective TRO12 be inserted into Chapter Six of the development plan which states *“Where resources permit, develop a transportation implementation plan during the lifetime of the development plan, which highlights priority schemes for development and improvement, and facilitates an integrated and planned approach to the improvement and development of new transportation infrastructure.”*

31. As the delivery of the North South Electricity Interconnector is a key element of Government policy, it is considered that an over arching policy within the development plan would not have any bearing on the delivery of this project and is not necessary.
32. **It is recommended that Policy EGP2 be amended to state “The undergrounding of electricity transmission lines shall be considered in the first, as part of a detailed consideration and evaluation of all options available in delivering and providing this type of infrastructure, *the development shall be consistent with international best practice with regard to materials and technologies that will ensure a safe, secure, reliable, economic, efficient and high quality network, and mitigation measures shall be provided where impacts are inevitable.*”**
33. **It is recommended that all references in the development plan to the Regional Development Strategy for Northern Ireland be amended to the most recent version published in March 2012 and include relevant detail and information from it.**
34. Noted and agreed.
35. **It is recommended that the public transport routes included on Map 3.7 should amended to make them more easily identifiable.**
36. Policy PAP2 withdraws exempted development rights for any development that would interfere with scenic quality/amenity if it took place. This policy reaffirms the provisions of Article 9 of the Planning and development Regulations 2001 (as amended)
37. It is anticipated that the Land Use Transportation Strategy, maps of public rights of way in the County, and the Design Guide for Rural Housing will be produced during the lifetime of the development plan.
38. Noted and agreed.

5.8 Submission Ref: DMCDP8

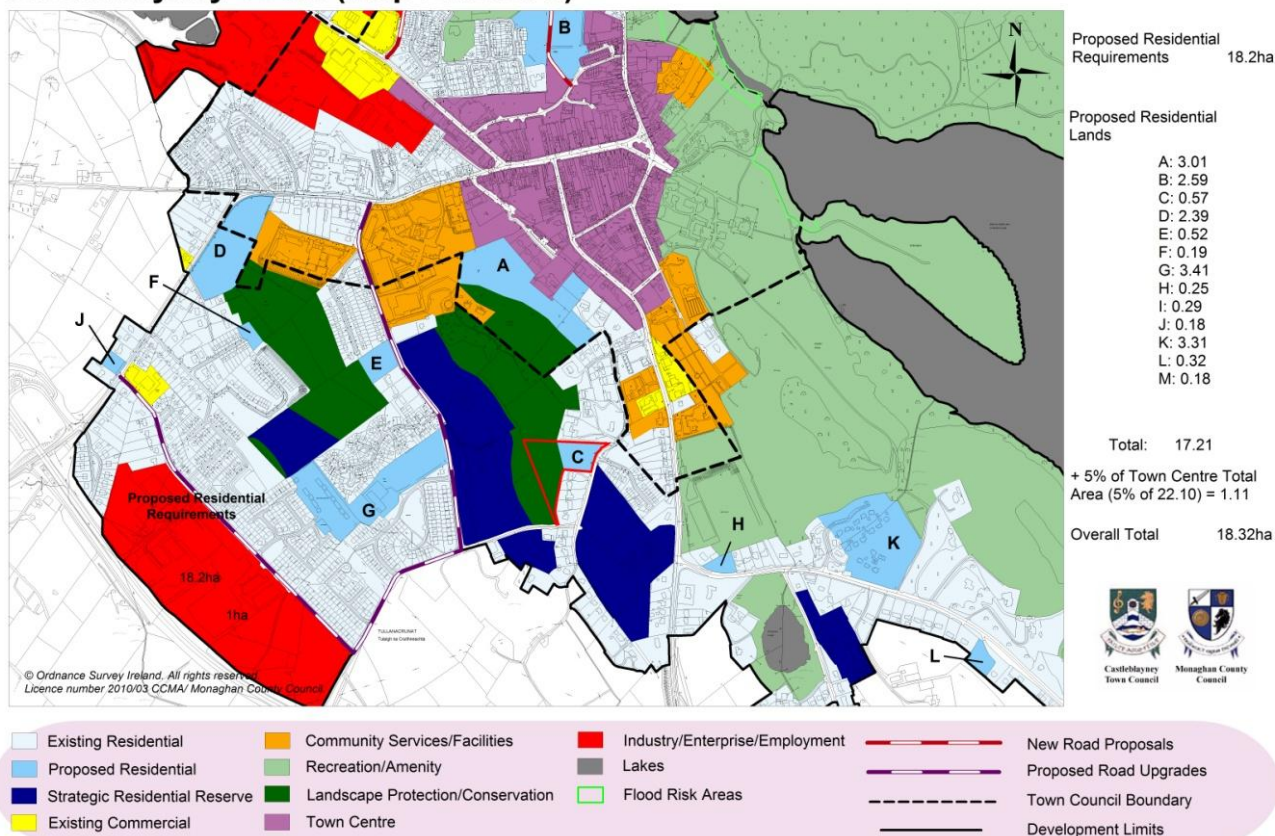
Person/Body: Relative Developments Ltd

Location: Bree Road, Connabury, Castleblayney – refer to Map DMCDP8

Core Issue: Zoning of Lands for Housing and Landscape Protection/Conservation

Castleblayney Town (Map DMCDP8)

Draft Monaghan County Development
Plan 2013-2019



Points Raised

1. The subject lands are located along Bree Road amongst long established residential properties. The lands have an area of 3.58 acres (1.45 hectares) and are currently zoned in the Monaghan County Development Plan 2007-2013 as low density housing (ie. development not exceeding 6 units per acre).
2. Castleblayney is identified as a Tier 2 town and described as a medium sized town in the draft plan which is in need of urban strengthening, having an extensive range of services.
3. The current land use zoning of the lands reflects the general pattern of development in the area. The draft plan proposes to zone only half of the lands for Proposed Residential use and the remainder as Landscape Protection/Conservation. It is requested that the entire subject site (outlined in red on Map DMCDP8) be zoned for residential land use as the site sits within a built up residential area and represents an infill site.

4. Planning permission was granted under Ref. 07/1643 for 10 no. large detached family type houses.
5. The current County Development Plan and Core Strategy state that there is a general trend in County Monaghan whereby there is a desire to live on the edge of settlements and rural areas rather than within town boundaries. Housing on the subject lands would assist in redressing this pattern of development, and consideration should be paid to retaining the current zoning objective on the lands.
4. The site is ideally located for proper plan led residential development and the land use zoning of the current County Development Plan ought to remain in place.
5. The Draft Plan identifies Castleblayney as catering for 320 no. dwellings between 2013 and 2019, and that the subject site with planning permission for 10 no. dwellings will not have a significant impact on the delivery of the Core Strategy.
6. Cognisance should be paid to the subject site's current planning status, its location, surrounding development and land uses, and the scale of development to be delivered on the site, rather than an examination against the figures within the Draft Plan.
7. The submission requests that an additional 0.88ha (2 acres) that is zoned as Landscape Protection/Conservation in the draft plan be zoned for residential land use.
8. The 2010-2022 Regional Planning Guidelines for the Border Region state that some of the demand for housing could be accommodated within any outstanding planning permissions that have been granted and not yet built. The Guidelines also state that planning permissions which are already granted must be considered first in identifying housing land requirements.
9. The area of the site and quantum of units to be delivered are negligible when compared to the overall housing yield outlined in the Core Strategy. There are other lands more removed from the town centre proposed to be zoned for residential development when compared to the subject site. These sites are not infill sites and do not reflect the sequential approach to development.
10. Given their location, the zoning of all the subject lands for housing accords with the spirit of the Planning and Development (Amendment) Act as it will assist in consolidating the settlement in a sequential manner.
11. The zoning and carrying out of development on the site will mitigate against urban sprawl and development beyond the footprint of the settlement. Therefore the entire area of the subject lands should be zoned for residential use.
12. The subject lands should be zoned for residential use as they are within the defined development boundary of Castleblayney and have already been identified for residential development in the current development plan.

13. The subject site is well placed to be developed in the short to medium term, having the benefit of planning permission, adequate physical infrastructure, good accessibility and proximity to the town centre. The current low density residential zoning should be continued into the new development plan.
14. It is requested that in adopting the new development plan the Council should adhere to the provisions of the Regional Planning Guidelines relating to the use of lands with the benefit of planning permission.
15. The lands are best placed to deliver family type housing given their location and the planning permission attached to them.
16. The carrying out of permitted low density development on these lands will be consistent with adjoining residential development, will represent the most efficient and sustainable utilisation of the land, and will comply with the sequential approach to development.
17. The carrying out of permitted works will not negatively impact on the character of the area. Views of the subject lands can only be seen from the Dundalk Road and it has been identified that the lands are surrounded by existing development which are at a higher level than the subject site.

Response of the Manager

1. Noted.
2. Noted.
3. Although it is proposed to zone the lower portion of the subject lands as proposed residential lands, the upper portion of the site is elevated and forms part of Connabury Hill, a prominent landmark in the landscape and thus it is recommended that it should be protected for the purposes of visual amenity.
4. Noted.
5. Noted.
6. The Planning and Development Act 2000 states in Section 10(8) that there is no presumption in law that any land zoned in a particular development plan shall remain so zoned in any subsequent development plan. In addition, the Planning and Development (Amendment) Act 2010, requires that a Core Strategy be included in a development plan which sets out housing figures based on projected population growth and that zoning of residential lands is commensurate with the population growth. Due to the location of the site and the surrounding development it is proposed to zone the lower portion of the subject lands as proposed residential lands. However given that the upper portion of the site is elevated and forms part of Connabury Hill, a prominent landmark in the landscape, this portion of the site should remain free from development.

7. As point 6 above. If the elected members decide to zone the entire subject land as Proposed Residential, an equivalent area of lands that are already Proposed Residential will have to be rezoned for a different use or excluded from the zoning entirely.
8. There is no objection to accommodating some of the housing requirement on the subject lands, and the lower portion of the subject lands has been proposed for residential use. **However, the upper portion of the site is elevated and forms part of Connabury Hill, a prominent landmark in the landscape and thus it is recommended that it should be protected for the purposes of visual amenity.**
9. The location of the upper portion of the site on a prominent part of Connabury Hill is the determining factor in designating this portion of the site as Landscape Protection/Conservation and not the issue of sequential development of the town and compliance with the Core Strategy.
10. As point 9 above.
11. Although it could be argued that the development of the site would assist in mitigating against urban sprawl and development beyond the footprint of the settlement, the location of the upper portion of the site on a prominent part of Connabury Hill is the determining factor in designating this portion of the site as Landscape Protection/Conservation.
12. The Planning and Development Act 2000 states in Section 10(8) that there is no presumption in law that any land zoned in a particular development plan shall remain so zoned in any subsequent development plan.
13. The issues raised are accepted in respect of the lower portion of the subject lands. However, the location of the upper portion of the site on a prominent part of Connabury Hill is the determining factor in designating this portion of the site as Landscape Protection/Conservation.
14. The decision to propose the lower portion of the subject lands for residential use is in keeping with the Regional Planning Guidelines. However, these Guidelines also place emphasis on the protection, conservation and management of the quality and distinctiveness of landscapes.
15. Noted, however there is an obligation on the planning authority to balance development with the protection of the landscape.
16. As point 15 above.
17. The subject lands can be viewed from the Tulnacrunnat Road and the Bree Road and are also visible from a wider surrounding area given their elevated position. The existing development to the north of the subject lands referred to is long established and was carried out prior to the European Landscape Convention being ratified in 2002.

5.9 Submission Ref: DMCDP9

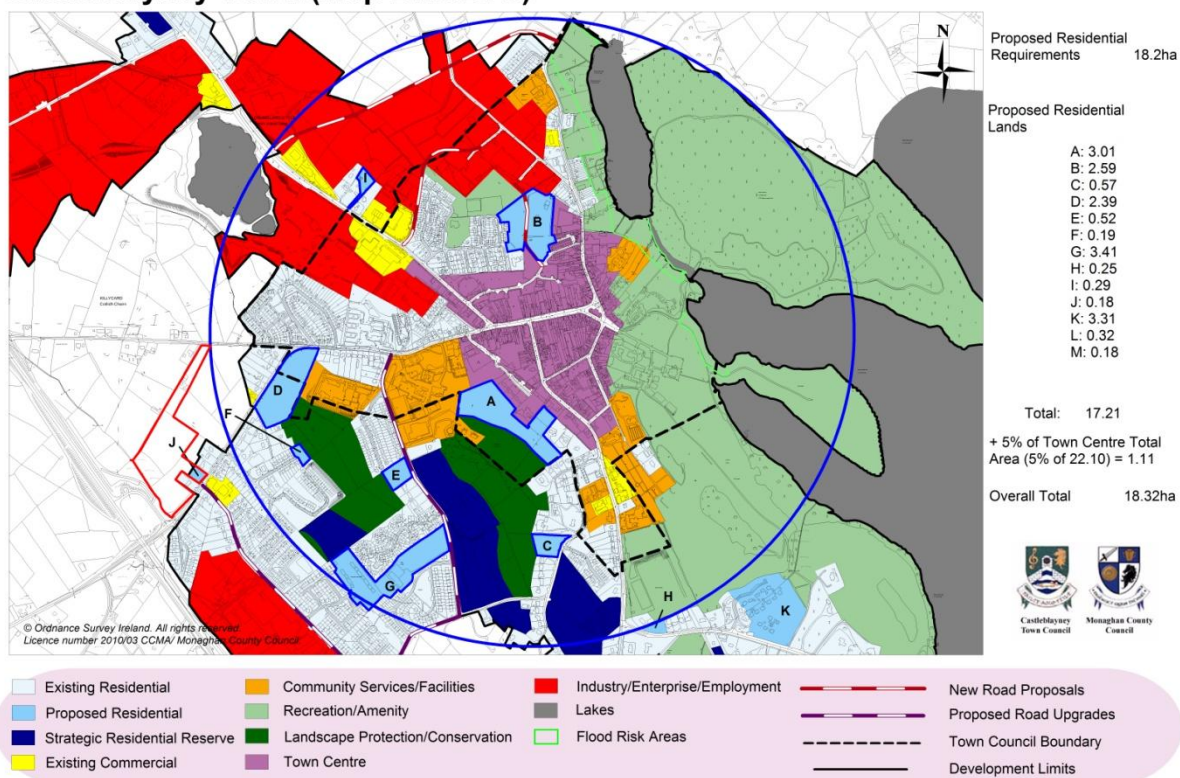
Person/Body: Relative Developments Ltd

Location: Killycard, Castleblayney – refer to Map DMCDP9

Core Issue: Zoning of Lands for Housing

Castleblayney Town (Map DMCDP9)

Draft Monaghan County Development
Plan 2013-2019



Points Raised

1. The subject lands are occupied by a derelict farmhouse and associate outbuildings and has direct frontage onto the Shercock Road and the Milehill Road amongst long established residential properties. The lands have an area of 12.5 acres (5 hectares) and are currently zoned in the Monaghan County development Plan 2007-2013 both as low density housing (ie. development not exceeding 6 units per acre) and higher density housing.
2. Castleblayney is identified as a Tier 2 town and described as a medium sized town in the draft plan which is in need of urban strengthening, having an extensive range of services.
3. The lands at Killycard have planning permission for 88 no. houses, 3 no. apartments and a crèche. The Draft Plan proposes to de-zone all but 0.44 acres (0.18ha). It is proposed that the entirety of this land be zoned for residential land use.
4. Planning permission was granted under Ref. 08/226 for 88 no. houses, 3 no. apartments and a crèche.

5. The current County Development Plan and Core Strategy state that there is a general trend in County Monaghan whereby there is a desire to live on the edge of settlements and rural areas rather than within town boundaries. Housing on the subject lands would assist in redressing this pattern of development, and consideration should be paid to retaining the current zoning objective on the lands.
6. The site is ideally located for proper plan led residential development given its location close to the town centre and the land use zoning of the current County Development Plan ought to remain in place.
7. The majority of zoned residential lands to the south of Castleblayney have been developed with the majority of plot G on Map CYDP1 forming the existing development of Ard Na Lurgan.
8. The lands are best placed to cater for residential development as they already have planning permission, and have the capability to cater for 25% of the recommended housing yield under the Core Strategy, while the current infrastructural services have the capacity to serve same.
9. The 2010-2022 Regional Planning Guidelines for the Border Region state that some of the demand for housing could be accommodated within any outstanding planning permissions that have been granted and not yet built. The Guidelines also state that planning permissions which are already granted must be considered first in identifying housing land requirements. The existing zoning of the lands along with planning permission on site all comply with figures set out in the Core Strategy.
10. There are other lands more removed from the town centre proposed to be zoned for residential development in comparison to the lands at Killycard. The Draft Plan ignores extant permissions but it is important that housing proposals with planning permission and a realistic chance of being delivered are considered, and request that the subject lands be zoned for residential use.
11. The site ought to remain zoned for residential land use as it has the benefit of planning permission, adequate physical infrastructure to serve same, access to the main transport routes and given its position in close proximity to the town centre.
12. It is requested that in adopting the new development plan, the Council should adhere to the provisions of the Regional Planning Guidelines relating to the use of lands with the benefit of planning permission.
13. The lands are best placed to deliver family type housing given their location and the planning permission attached to them.
14. The carrying out of permitted residential development on these lands will be consistent with adjoining residential development, will represent the most efficient and sustainable utilisation of the land, and will comply with the sequential approach to development.

15. The entirety of the subject lands, consisting of 12.5 acres (5 hectares) should be zoned for residential land use.

Response of the Manager

1. Noted. The planning permission associated with the lands relates to ref. 08/226. These permissions expire on 27/05/2013.
2. Noted.
3. Noted.
4. Noted.
5. There are a number of similar sized plots of land within the proposed settlement envelope that are sequentially closer to the core of the settlement and that would be suitable for housing. These are indicated as sites outlined in blue on Map DMCDP9.
6. The Planning and Development (Amendment) Act 2010 required the inclusion of a Core Strategy within development plans, which dictates that lands should be zoned for residential development based on demand and sequential location. The Core Strategy incorporated within the draft County Development Plan has determined the quantum and location of residential lands required during the period of the development based on projected population growth and the sequential approach to land use zoning as stipulated in the Department of Environment, Community and Local Government Guidance Note on Core Strategies, the Development Plan Guidelines and the Sustainable Residential Development in Urban Areas Guidelines published by the Department, and Chapter Five of the National Spatial Strategy.
7. This statement is disputed. There are a significant number of plots of land proposed to be zoned for either Proposed Residential land or Strategic Residential Reserve land in the southern and western portions of Castleblayney which are undeveloped. Plot G adjoins Ard Na Lorgan and does not form part of the development. In addition, the majority of this plot is undeveloped.
8. The Planning and Development Act 2000 states in Section 10(8) that *there shall be no presumption in law that any land zoned in a particular development plan (including a development plan that has been varied) shall remain so in any subsequent development plan*. In addition, the Planning and Development (Amendment) Act 2010 required the inclusion of a Core Strategy within development plans, which dictates that lands should be zoned for residential development based on demand and sequential location. The Core Strategy incorporated within the draft County Development Plan has determined the quantum and location of residential lands required during the period of the development plan, based on projected population growth and the sequential approach to land use zoning as stipulated in the Department of Environment, Community and Local

Government Guidance Note on Core Strategies, the Development Plan Guidelines and the Sustainable Residential Development in Urban Areas Guidelines published by the Department, and Chapter Five of the National Spatial Strategy

9. Given the requirement of the Planning and Development (Amendment) Act 2010 and the Development Plan Guidelines to ensure development takes in a sequential manner from the core of the settlement outwards, and the fact that there is a significant number of plots of land closer to the core of the settlement that are suitable for housing, and capable of providing more than the required number of houses during the lifetime of the development plan, it is recommended that the subject lands are not zoned for either Strategic Residential Reserve or Proposed Residential use.
10. As point 5 above.
11. The Planning and Development (Amendment) Act 2010, the Development Plan Guidelines for Planning Authorities published by the Department of Environment Heritage and Local Government (DEHLG), and the Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities published by DEHLG require a sequential approach to the zoning of land. It is considered that there are a significant number of plots of land closer to the core of the settlement that are suitable for housing, and are capable of providing more than the required number of houses during the lifetime of the development plan than the subject lands.
12. As point 9 above.
13. As point 5 above.
14. It is considered that the provision of zoned residential land at this location on the periphery of Castleblayney, and in excess of the plots of land identified as suitable for residential zoning due to their location, would be contrary to the provisions of the Planning and Development (Amendment) Act 2010, the Development Plan Guidelines for Planning Authorities published by the Department of Environment Heritage and Local Government (DEHLG), and the Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities published by DEHLG.
15. Section 4.19 of the DEHLG Development Plan Guidelines clearly states that a logical sequential approach should be taken to the zoning of land, where zoning should extend outwards from the centre of an urban area, where emphasis should be placed on infill opportunities and better use of under utilised lands, and where areas to be zoned should be contiguous to existing zoned development land. The Guidelines further state that only in exceptional circumstances should these principles be contravened and any exceptions must be clearly justified by local circumstances and such justification must be set out in the written statement of the development plan. The inclusion of the subject lands within the settlement envelope for residential use would not be in keeping with the requirement

for sequential development of land from the centre outwards, or the principle of consolidating development to maintain a compact urban form, and would be contrary to the promotion of a pattern of development that encourages alternative modes of transport such as walking and cycling. **For these reasons and those set out in points 5, 6, 8, 9, 10 and 14 above, it is recommended that the subject lands are excluded from the settlement envelope of Castleblayney and are not zoned as Proposed Residential or Strategic Residential Reserve.**

5.10 Submission Ref: DMCDP10
Person/Body: Mary McNally
Location: Annyalla
Core Issue: Protection of Landscape

Points Raised

1. Mrs McNally lives close to Tasan Lough and Cashel Bog which are a sanctuary for wildlife and have remained unhindered by human development for centuries.
2. Cashel Bog has been untouched since the 1960s, is regenerating and should be declared a national heritage area.
3. Planning for preservation of areas of natural beauty will avoid the mistakes of the past.
4. Tourism is likely to be important in Monaghan in the future and the county's untouched rural landscape is an attraction asset.
5. Many tourist assets in industrialised countries have been depleted and visitors are attracted by the unspoilt drumlin landscape of Monaghan.
6. The landscape should be protected for future generations.

Response of the Manager

1. Noted.
2. Noted. The draft development plan contains objectives and policies to protect both designated and undesignated wildlife habitats.
3. Noted.
4. Noted.
5. Noted.
6. Noted and agreed. Chapters Four and Fifteen of the draft development plan contain a number of objectives and policies to protect the landscape from intrusive development and to protect those landscapes of primary and secondary amenity, and scenic routes.

5.11 Submission Ref: DMCDP11
Person/Body: Gerard McNally
Location: Annyalla
Core Issue: Protection of Landscape

Points Raised

1. Wishes to keep the tops of hills free from development by companies who wish to make a profit and have no interest in protecting the environment.
2. Phone masts, wind farms and pylons are a blight on the landscape and they should be prevented from siting on tops of small hills in the same way that houses are prevented from doing so.
3. The greed of companies has left ghost estates and clogged up floodplains.
4. Planning policy must prevent unsightly developments on our small hills.

Response of the Manager

1. Noted.
2. Noted.
3. Noted.
4. Noted and agreed. Chapters Four and Fifteen of the draft development plan contain a number of objectives and policies to protect the landscape from intrusive development and to protect those landscapes of primary and secondary amenity, and scenic routes.

5.12 Submission Ref: DMCDP12
Person/Body: Martin Traynor
Location: Clontibret
Core Issue: Protection of Landscape

Points Raised

1. The Monaghan Walk Way is a key attraction in the area, used by tourists and locals, and there is not enough emphasis placed on this resource.
2. School children should be taught the benefits of using the Monaghan Walk Way.
3. Literature should be kept in local hotels and signage should be displayed on the new bypass.
4. The area along Monaghan Way should be protected from any intrusive developments.

Response of the Manager

1. Noted.
2. Noted.
3. Noted.
4. Noted and agreed. Chapters Four and Fifteen of the draft development plan contain a number of objectives and policies to protect the landscape from intrusive development and to protect those landscapes of primary and secondary amenity, and scenic routes.

5.13 Submission Ref: DMCDP13
Person/Body: Noel McGarrell
Location: Annyalla
Core Issue: Protection of Landscape

Points Raised

1. Developers should give serious consideration to developments which blight our landscape.
2. Planners are very perscriptive when it comes to the siting and design of rural houses.
3. Pressure is being placed by companies to permit development via An Bord Pleanala.
4. Local planners are best placed to insert clauses in the development plan to protect rural communities from obtrusive development.
5. Structures on tops of hills cannot be hidden and visually intrusive development should not be tolerated.

Response of the Manager

1. Noted.
2. Noted.
3. Noted.
4. Noted.
5. Noted and agreed. Chapters Four and Fifteen of the draft development plan contain a number of objectives and policies to protect the landscape from intrusive development and to protect those landscapes of primary and secondary amenity, and scenic routes.

5.14 Submission Ref: DMCDP14
Person/Body: Crann
Location: Bawn
Core Issue: Protection of Trees

Points Raised

The development plan should only contain proposals for Bawn as a village if the ecological and arboreal integrity of Lough Bawn and its associated woodlands are protected.

Response of the Manager

Although Bawn is not designated as a village in the development plan, it is likely to be considered as falling within the definition of a Tier 6 settlement. It is not considered that there will be a detrimental loss of ecology or woodland surrounding Lough Bawn given the objectives and policies contained within Chapter Four providing protection to biodiversity, habitats, landscapes, and designated sites.

5.15	Submission Ref:	DMCDP15
	Person/Body:	National Roads Authority
	Location:	N/A
	Core Issue:	National Road Network

Points Raised

1. The Authority attaches particular importance to the network of national roads both for inter urban and inter regional connections and also for connecting remote communities.
2. The Authority supports policies and objectives that promote safety and efficiency of national roads given their central role in catering for business travel and movement of goods.
3. The Council will be aware of the priority to ensure adequate maintenance of the national road network to protect previous investment.
4. In addition to the Monaghan-Dundalk Link and the Monaghan-Derry link, the Armagh-Monaghan-Clones road is also identified as a strategic route.
5. The Department of Environment, Community and Local Government (DECLG) 2012 publication "Spatial Planning and National Roads Guidelines for Planning Authorities" advise that the plan may provide for a limited level of direct access to facilitate orderly urban development on the approaches to /exit from urban area that are subject to a speed limit of 60kph. Any such proposal must be subject to a Road Safety Audit and a proliferation of such accesses must be avoided.
6. Objective NRO7 in respect of prohibiting the creation of accesses onto any portion of realigned national route does not give full effect to the policy outlined in the Spatial Planning and National Roads Guidelines for Planning Authorities and Objective NRO7 should be amended to allow the intensification/creation of accesses onto national roads where the speed limit is 60kph or less.
7. Objective RPO9 does not make any reference to the issue of intensification of existing accesses and should be amended to allow the creation of accesses onto national roads where the speed limit is less than 60kph.
8. The following policy should be considered in respect of Objectives NRO7 and RPO9 *"Prohibit the creation of any new access to the national road network or the intensification of existing accesses to national roads in areas outside where a reduced speed limit applies in the interest of road safety and in accordance with the provisions of the DECLG Spatial Planning and National Roads Guidelines for Planning Authorities (2012)"*
9. The Authority is concerned regarding the exceptions set out in Section 15.21 of the draft plan relating to accesses onto national roads. Section 2.5 of the DECLG publication "Spatial Planning and National Roads Guidelines for Planning Authorities" advises that

the policy of the planning authority will be to avoid the creation of any additional access or the generation of additional traffic from existing accesses onto national roads where the speed limit is greater than 60kph. This applies to all types of development including rural housing regardless of the applicant's housing circumstances. Section 2.6 of the guidelines indicates that planning authorities may identify developments of National and Regional Strategic Importance, or Lightly Trafficked Sections of National Secondary Routes in consultation with the NRA where access onto a national road may be allowed. However, the NRA cannot support the exceptions listed in Section 15.21 of the draft plan and requests that it be reviewed.

10. The NRA is available to discuss any particular circumstances relevant to Monaghan which would necessitate access or intensification of an existing access onto a national road.
11. The Authority notes objective NRO6 in respect of service areas along the national roads and would refer to the Spatial Planning and National Roads Guidelines which state that there are sufficient road side facilities in existence on the national road network. The draft plan should reflect the provisions of these guidelines.
12. The authority considers that the carrying capacity, safety and efficiency of the existing national road network must be safeguarded pending the delivery of planned network improvements to the N2 and N54/N2 routes.
13. The NRA welcomes objectives NRO2 and NRO5, and notes the proposed improvements to the N53 and N54 set out in Table 6.3, even though they are not NRA funded schemes.
14. The Council should be aware that the implementation of all national road schemes is subject to budgetary constraints and prioritisation.
15. The Authority requests that reference be made in Sections 3.5 and 15.4 of the draft plan to the prohibition of new accesses or intensification of accesses serving all types of development onto national roads where speed limits are in excess of 60 kph.
16. Direct access should not be permitted onto a national road for new development outside the speed limit zones for urban areas. This policy is applicable in all cases where an access is proposed onto the national road regardless of the housing circumstances of the applicant.
17. In respect of Objective ERO12, the Authority requests to be consulted with proposals to ensure the safe and efficient operation of national roads and compliance with the Spatial Planning and National Roads Guidelines.
18. The authority notes Objectives INO2 and the applicable Industry, Enterprise and Employment land use zonings.
19. Although Objectives TRO2 and TRO3 promote consolidation of development and integration of land use to reduce reliance on private vehicle transport, the NRA requests

- that the Spatial Planning and National Roads Guidelines be referenced in these policies to prevent access onto or intensification of access onto national roads in the countryside.
20. The NRA acknowledges the importance of the extractive industry, agriculture, horticulture and forestry but requests that the Spatial Planning and National Roads Guidelines be referenced in the policies in Sections 5.9, 15.12, 15.13, 15.14, 15.17, and 5.18 to prevent access onto or intensification of access onto national roads in the countryside.
 21. The Authority welcomes the inclusion of Objective ASP3 relating to signage on national roads, and highlights the Authority's Policy on the Provision of Tourist and Leisure Signage on National Roads in respect of Policies ASP14 and ASP20. Section 3.8 of the Spatial Planning and National Roads Planning Guidelines indicates a requirement to control the proliferation of non road traffic signage on and adjacent to national roads and reference to the NRA policy and the guidelines in these policies is requested.
 22. The Authority notes the reference to the requirement for a Traffic and Transport Assessment (TTA) and mention of the NRA TTA Guidelines. Although the draft plan makes reference to certain thresholds being exceeded, TTAs may be required in sub threshold cases as detailed in Section 2.2 of the NRA TTA Guidelines. The NRA requests that the thresholds set out in the NRA Guidelines be specifically referred to.
 23. Although Section 15.25 and Appendix 10 make reference to NRA Design Manual for Roads and Bridges (DMRB) HD 19/01 and HA 42/01 in respect of Road Safety Audits (RSA) have been superseded by HD 19/09 Road Safety Audit.
 24. Although the draft plan only refers to RSAs being required on national primary roads, the NRA Design Manual for Roads and Bridges (DMRB) applies to all national roads.
 25. The NRA notes the new road proposals in Monaghan Town as indicated on Map MDP1, but would request that any route improvements undertaken would be consistent with and not undermine or impact negatively on proposed, identified strategic national road schemes.
 26. The NRA requests that the Council review the proposed zoning along the N12 and N54 where the 60kph and 100kph speed limits apply in respect of access requirements and the provisions of the Spatial Planning and National Roads Planning Guidelines.
 27. The Authority notes that all land use designations in Carrickmacross are within the N2 Bypass and that Policy NRO7 prohibits access onto the Bypass. The Authority recommends that development proposals in proximity to the N2 junctions are appropriately assessed to ascertain the traffic generation implications on the safe and efficient operation of the N2 and its junctions. The cumulative effect of development should be considered and the requirement for a TTA should be raised.
 28. The Authority notes that all land use designations in Castleblayney are within the N2 Bypass and that Policy NRO7 prohibits access onto the Bypass. However it is noted that

residential sites have been zoned at locations along the N53 where 60 kph and 100kph speed limits apply and a commercial site is also identified at a location where the 100kph speed limit applies on the N53. The Authority requests that the Council reviews the proposed zonings with regard to the provisions of the Spatial Planning and National Roads Guidelines.

29. The NRA is concerned that Section 11.8 of the draft plan states that direct access to the Castleblayney Bypass is possible for the Bree Industrial Estate. The Authority does not support the use of this access and requests that this reference is removed from the plan.
30. The Authority recommends that development proposals in proximity to the N2 junctions are appropriately assessed to ascertain the traffic generation implications on the safe and efficient operation of the N2 and its junctions. The cumulative effect of development should be considered and the requirement for a TTA should be raised.
31. The Authority notes that most of the extensive Industry, Enterprise and Employment zoned lands along the N54 is located where the 50kph speed limit applies and would request that a co-ordinated access strategy compliant with the Spatial Planning and National Roads Guidelines is devised for the area to ensure all developments access the N54 within this speed limit.
32. The Authority recommends that development proposals in proximity to the N54 are appropriately assessed to ascertain the traffic generation implications on the safe and efficient operation of the N54. The cumulative effect of development should be considered and the requirement for a TTA should be raised.
33. The NRA notes that the settlement limit for Smithborough extends to the east of the village along the N54 at a location where the 100kph speed limit applies. The Authority requests that the Council reviews the proposed settlement limit or considers the access requirements for it with regard to the provisions of the Spatial Planning and National Roads Guidelines.
34. The NRA notes that the settlement limit for Emyvale extends to the north of the village along the N54 at a location where the 60kph speed limit applies. The Authority requests that the Council reviews the proposed settlement limit or considers the access requirements for it with regard to the provisions of the Spatial Planning and National Roads Guidelines.

Response of the Manager

1. Noted.
2. Noted.
3. Noted and agreed.

4. Section 6.2.8 of the draft plan will be revised to include the Strategic Links in the Border Region as well as the Strategic Radial Corridors in the region.
5. Noted and agreed.
6. It is recommended that Objective NRO7 be revised to read ***“Prohibit the intensification of use or creation of any new access onto the national ~~route~~ road network outside where a reduced speed limit applies, particularly onto any portion of realigned national road where the original national road has been reclassified or downgraded, and to strictly limit the number of accesses or the intensification of use of existing accesses onto national roads where speed limits of 60kph or less apply.”***
7. It is recommended that Objective RPO9 in Chapter Eight be revised to read ***“Control and restrict any new direct access points or intensification of use of existing accesses onto the national ~~Route~~ road network within the general speed limit areas in accordance with the policies contained within Chapter 15, Development Management Guidelines, Monaghan County Development Plan 2013-2019.”***
8. It is recommended that this wording be incorporated into Objectives NRO7 and RPO9 as set out in points 6 and 7 above.
9. It is recommended that the exceptions listed in the draft development plan under policies NRP1, NRP3 and NRP4 are removed and replace with the exceptions listed in the Spatial Planning and National Roads Guidelines namely, developments of a National or Regional Strategic Importance or lightly trafficked sections of the National Secondary roads. Policies NRP1, NRP3 and NRP4 should be replaced with two policies NRP1 and NRP3.

Policy NRP1 should state ***“Where a development of national or regional strategic importance is proposed which by its nature is most appropriately located outside urban areas, or where the location for the proposed development has specific characteristics that make it particularly suitable for the development proposed. In assessing the proposed development regard will be had to the provisions of the Department of Environment, Community and Local Government Guidelines for Planning Authorities “Spatial Planning and National Roads (2012)”***

Policy NRP3 should state” ***Where a development which has no suitable alternative non-national public road access, is proposing to access onto a lightly-trafficked section of national secondary road* which serves a structurally weak area.***

****Traffic volumes are low and are forecast to remain below 3,000 AADT (as verified by the NRA) for the next 20 years”***

The remaining Policies NRP6 and NRP7 being renumbered NRP4 and NRP5 respectively.

10. Noted.
11. It is recommended that Objective NRO6 is amended to read ***“~~Provide or Facilitate the provision of a limited number of service areas to provide for the needs of the private and commercial road user at appropriate locations along the N2 in accordance with the provisions of the DECLG Guidelines for Planning Authorities “Spatial Planning and National Roads”. and subject to normal planning considerations and the undertakings of the National Roads Authority Policy Statement on the provision of Service and Rest Areas~~”***
12. Noted and agreed.
13. Noted.
14. Noted.
15. Given that there are specific sections, objectives and policies relating to the control of accesses onto national roads, it is considered that it is not necessary to specifically mention objectives and policies in respect of control of accesses onto national roads in Sections 3.5 and 15.4. **A statement in the preface and Section 1.8.4 stating that “*The objectives and policies set out in this document must be read together and not in isolation when considering development proposals within the functional areas that make up County Monaghan Local Authorities*” should be included.**
16. As point 9 above.
17. Noted.
18. Noted.
19. Given that there are specific sections, objectives and policies relating to the control of accesses onto national roads, it is considered that it is not necessary to specifically mention objectives and policies in respect of control of accesses onto national roads in Objectives TRO2 and TRO3. **A statement in the preface and Section 1.8.4 stating that “*The objectives and policies set out in this document must be read together and not in isolation when considering development proposals within the functional areas that make up County Monaghan Local Authorities*” should be included.**
20. Given that there are specific sections, objectives and policies relating to the control of accesses onto national roads, it is considered that it is not necessary to specifically mention objectives and policies in respect of control of accesses onto national roads in Sections 5.9, 15.12, 15.13, 15.14, 15.17, and 5.18. **A statement in the preface and Section 1.8.4 stating that “*The objectives and policies set out in this document must be read together and not in isolation when considering development*”**

proposals within the functional areas that make up County Monaghan Local Authorities” should be included.

21. It is recommended that Policy ASP14 be revised to read “The Council considers that finger post signs may be acceptable as an alternative to advertising signs where such advertising signs may detract from amenity or create a traffic hazard. *Such signs shall be in accordance with the provisions of the National Roads Authority document “ Provision of Tourist and Leisure Signage on National Roads”*
22. It is recommended that the thresholds set out in the NRA Guidelines are specifically referred to and that the third paragraph of Section 15.24 be revised to include “TTAs may be required in sub threshold cases as detailed in Section 2.2 of the NRA TTA Guidelines”.
23. It is recommended that the reference to NRA document DMRB HD 19/01 and HA 42/01 in respect of Road Safety Audits (RSA) in Section 15.25 and Appendix 10 be replaced by reference to NRA document HD 19/09 Road Safety Audit.
24. It is recommended that the second paragraph of Section 15.25 be amended to state “Road Safety Audits must be carried out in accordance with the NRA Design Manual for Roads and Bridges in relation to all planning applications involving a new entrance / intensification of an existing access onto a National *Primary* Road or a change to the existing layout of National *Primary* Road.”
25. Noted and agreed.
26. It is considered that the zoned Industry, Enterprise and Employment lands along the N54 where the general speed limit applies can obtain access via a local road. It is considered that the lands zoned Strategic Residential Reserve should be permitted to access onto the N54 at a point where the 60kph speed limit applies subject to compliance with all other objectives and policies in the development plan and satisfactory Traffic and Transport Assessments and Road Safety Audits. The majority of lands zoned Industry, Enterprise and Employment lands along the N12 can obtain access via the existing accesses serving the existing industrial premises, via the Tullyherim Road (subject to capacity and the provision of satisfactory access arrangements) and via the proposed service road for these lands which runs from the N2 to the N12.
27. Noted and agreed.
28. The zoned residential sites along the N53 are with the exception of two sites, existing residential sites. One proposed residential site (Plot L) has been zoned for residential use on the basis that it is an infill site which would consolidate the settlement and the number of residential units on the site would be restricted by the requirement for development to reflect the density, size, scale, nature of adjoining development. This site is located in the transitional speed zone. The other proposed residential site (Plot M) has been zoned for

residential use on the basis that it contains agricultural buildings which are located amongst residential uses, and it would be more appropriate if it was in residential use. The development of this plot is obviously subject to the objectives and policies set out in the development plan in respect of access onto national roads. The site zoned as existing commercial already contains a business premises.

29. The NRA had previously written to the County Manager on 6th April 2004 stating that it had no objections to the creation of this access subject to Monaghan County Council bearing the cost, a standard of access in accordance with the DMRB, and the access not opening until the Bypass is operational. It is considered that the direct access onto the N2 is of strategic importance to the County given the concentration of major employers in the Bree Industrial Estate and given that there is no alternative to the current unsatisfactory access arrangements which passes through a large area of housing.
30. Noted and agreed.
31. **It is recommended that the fifth paragraph of Section 12.8 of the Clones Development Plan is amended to state “Approximately 35 hectares of land have been zoned for industry on the attached map, CDP 1. These areas include existing industrial sites within the town, with the remaining area to accommodate all proposed industry in the town during the plan period 2013-2019. The majority of this land is adjacent to the N54. *Access to the zoned Industry, Enterprise and Employment lands along the N54 where the general speed limit applies should be in the first instance via the proposed road linking the N54 to the Roslea Road. Only where there is no other reasonable alternative, would direct access onto the N54 be permitted where the general speed limit applies, and it would be subject to the provision of satisfactory access arrangements. Any application for development on these lands proposing direct access onto the national road shall be accompanied by a master plan for the entire Industry, Enterprise and Employment zoning at this location.* All new industrial development within Clones shall be required to comply with the objectives and policies contained within Chapters 4, 5, 6, 8 and 15 of the Monaghan County Development Plan 2013–2019. Specific policies with regard to industrial development in Clones are as follows:-“**
32. Noted and agreed.
33. It is possible to provide access to those lands within the settlement envelop to the east of Smithborough via the adjoining local roads.
34. The lands to the north of Emyvale within the settlement envelop of the village are already in industrial use.

5.16	Submission Ref:	DMCDP16
	Person/Body:	Department of Education & Skills
	Location:	Monaghan Town and Castleblayney
	Core Issue:	Provision of Lands for Education Purposes

Points Raised

1. In light of population projections and subsequent increase in primary level school goers, the Department feels that it is prudent to reserve a site in Monaghan Town for an 8 classroom primary school. The area of a site to serve this purpose would be 1.4 hectares (2.8 acres).
2. The Department wishes to note that Gaelscoil Lorgain, Castleblayney is currently in temporary accommodation, and that a permanent site will be required for the long-term development of the school. A site of 1.4 hectares (2.8 acres) will be required.
3. The Department expects that existing primary schools will be capable of catering for the increase in pupil numbers. However, if this is not possible, it may be necessary for some schools to build extensions subject to site suitability and agreement of the various stakeholders.

Response of the Manager

1. It is considered that the identification of a particular site for a primary school as requested would be restrictive and thus would be inappropriate. However, the amended Development/Zoning Matrix in the Appendix sets out that a school would be acceptable in principle on Community Services/Facilities and would be open for consideration on Town Centre, Existing Residential, Proposed Residential, Strategic Residential Reserve, Existing Commercial, and Local Area Action Plan zonings. Therefore given the range of land use zonings that a school could be possibly developed upon, it is considered that there is sufficient scope to permit the identification of a school site when the need arises. In the case of a school being developed upon Proposed Residential, an equivalent quantum of Strategic Residential Reserve would be converted to Proposed Residential by way of variation to ensure that the supply of housing land is not diminished.
2. As point 1 above.
3. Noted. Paragraph 8.3.7 of Chapter 8 of the Draft Monaghan County Development Plan 2013-2019 outlines that land zoned for 'Community Services/Facilities' caters for both new and existing community, civic and educational uses or the extension of existing facilities.

5.17 Submission Ref: DMCDP17
Person/Body: Malcom Greenan
Location: Bawn
Core Issue: Social Housing in Bawn and Bawn as a Tier 6 Settlement

Points Raised

1. The existing social housing development at Bawn has not fulfilled any of the points put forward by Bawn Housing and Community Association in 2005 in support of the development. Mr. Greenan states that this supports his argument as to why there should be no further development in Bawn.
2. Rural developments such as the one in Bawn do not make planning sense and have adverse effects on the people allocated the social housing and the community as a whole.
3. There are no amenities in the Bawn area, e.g. schools, community centre, shops etc.
4. There is no public transport in the Bawn area.
5. Persons living in social housing are isolated given the distance from doctors, family, friends etc.
6. Residents of social housing do not contribute to the community as they do not participate in local events.
7. People who qualify for social housing are not in full time employment and therefore there is not a need to live in a particular area.
8. Such developments are not suitable for the rural setting and Bawn given that it is a scenic area.
9. Social housing development should be located within close proximity to urban areas where there is easy access to all amenities and required facilities.
10. The Council should not be proposing to build new houses when there are un-occupied houses throughout the Co. Monaghan and the country.

Response of the Manager

1. Noted.
2. Noted.
3. Noted.
4. Noted.
5. Noted
6. Noted
7. Noted
8. It is expected that the majority of development taking place in Tier 6 settlements will be single dwellings. Section 3.4.5 states that development in Tier 6 settlements will be

restricted to single dwellings. Where housing developments are proposed in Tier 6 settlements, the onus will be upon the developer to justify the demand for the housing proposed, the development shall be centred on the focal point of the settlement, and shall be subject to the satisfactory provision of infrastructure and services. All proposals for residential development within Tier 6 settlements will be subject to Policy CSP2 which requires, amongst other criteria, that it reflects the nature, scale and form of existing development within the settlement.

9. The provision of an acceptable standard of housing for all is a core aspiration of public policy. The Department of Environment, Community and Local Government's Housing Policy Statement, 2011, indicates that the overarching aim of national housing policy is now to enable all households to access good quality housing which is appropriate to household circumstances in their community of choice. Therefore where a demand for housing arises there is an onus for the local authority to seek to satisfy that demand.
10. Monaghan County Council recognises that there are a number of vacant and unfinished residential developments in the county. Notwithstanding this, there is uncertainty as to whether or not these developments will be completed and/or when they will be available for occupation.

5.18 Submission Ref: DMCDP18
Person/Body: Nuala Greenan
Location: Bawn
Core Issue: Social Housing in Bawn and Bawn as a Tier 6 Settlement

Points Raised

1. The existing social housing development at Bawn has not fulfilled any of the points put forward by Bawn Housing and Community Association in 2005 in support of the development. Mrs. Greenan states that this supports her argument as to why there should be no further development in Bawn.
2. Rural developments such as the one in Bawn do not make planning sense and have adverse effects on the people allocated the social housing and the community as a whole.
3. There are no amenities in the Bawn area, e.g. schools, community centre, shops etc.
4. There is no public transport in the Bawn area.
5. Persons living in social housing are isolated given the distance from doctors, family, friends etc.
6. Residents of social housing do not contribute to the community as they do not participate in local events.
7. People who qualify for social housing are not in full time employment and therefore there is not a need to live in a particular area.
8. Such developments are not suitable for the rural setting and Bawn given that it is a scenic area.
9. Social housing development should be located within close proximity to urban areas where there is easy access to all amenities and required facilities.
10. The Council should not be proposing to build new houses when there are un-occupied houses throughout the Co. Monaghan and the country.

Response of the Manager

Refer to response given in respect of Submission DMCDP17.

5.19	Submission Ref:	DMCDP19
	Person/Body:	Inland Fisheries Ireland (Eastern River Basin District)
	Location:	N/A
	Core Issue:	Protection of Aquatic Habitats

Points Raised

1. Submission sets out responsibilities of Inland Fisheries Ireland (IFI) its mandate to protect the fisheries of the State.
2. Section 3.5 should include reference to the development meeting the remaining relevant policies in the development plan.
3. IFI welcomes the objectives for Biodiversity and Natural Heritage, however a policy to resist any development that may have a negative impact upon Biodiversity and Natural Heritage, should be included.
4. IFI welcomes the policies for the protection of water.
5. Objective AGO4 should be amended to include surface waters.
6. The development plan should address the need to meet the Water Framework Directive objectives in respect of practices such as water abstraction and effluent discharge.
7. IFI welcomes the objectives for Tourism particularly TMO8, TMO11 and TMO17.
8. IFI suggests that the construction of transport infrastructure should be carried out so as not to pose a threat to fisheries through pollution or interference. Consultation with IFI should be commence early in project planning and reference should be made to the IFI guidance "Requirements for the Protection of Fishery Habitat During Construction and Development Works at River Sites" in Section 6.2 of the plan.
9. IFI has concerns regards the promotion of Integrated Constructed Wetlands as this method of effluent disposal is relatively new and its usage should be limited until proven environmentally sound.
10. IFI wishes to be consulted in respect of any plans or projects relating to flooding.
11. Section 6.5 should include reference to the development meeting the remaining relevant policies in the development plan.
12. IFI recommends that Section 9.9.1 of the draft Monaghan Town Plan includes reference to fish stocks, given that Peter's Lake and the River Blackwater contain good stocks.
13. Angling tourism should be included in Section 9.11.
14. Objective CKO2 is noted and IFI recommends that Section 10.4.1 of the draft Carrickmacross Town Plan includes reference to fish stocks, given that Lisnanisk/Brothers Lake, Lough Na Glack and the Proules River contain good stocks.
15. Angling tourism should be included in Section 10.11.

16. IFI recommends that Section 11.4.1 of the draft Castleblayney Town Plan includes reference to fish stocks, given that Lough Muckno contains good stocks.
17. Objective CBO4 is noted and suggest that it also includes Lough Muckno.
18. It is recommended that surface and ground water flows in respect of practices such as water abstraction and effluent discharge are considered in Section 6.9 of the Environmental Report.
19. IFI would urge the Council to include effective policies within the development plan to ensure protection and conservation of fishery habitats in the County.

Response of the Manager

1. Noted.
2. **It is recommended that a statement in the preface and Section 1.8.4 stating that “*The objectives and policies set out in this document must be read together and not in isolation when considering development proposals within the functional areas that make up County Monaghan Local Authorities*” should be included within the development plan.**
3. **It is recommended that an additional objective be included with Objectives BDO1 to BDO7 in Chapter Four to read as follows “*The Council will resist any development that may have a negative impact upon Biodiversity and Natural Heritage*”.**
4. Noted.
5. **It is recommended that Objective AGO4 be amended to read “Protect soil, *surface water*, groundwater, wildlife habitats, conservation areas, rural amenities and scenic views from adverse environmental impacts as a result of all agricultural practices.”**
6. It is considered that the objectives and policies in Section 4.9 of the draft plan deals adequately with these issues to meet the objectives of the Water Framework Directive.
7. Noted.
8. Section 4.9 of the draft development plan contains a policy to prevent any instream works unless in accordance with IFI guidelines. There is also a requirement to consult IFI when works are proposed close to waterways. **It is recommended that policy WPP 6 be amended to state “Prevent further degradation of habitat by the promotion of riparian corridors and the prevention of any in stream works or culverting of waterways unless in accordance with Inland Fisheries Ireland (IFI) *guidance document ‘Requirements for the Protection of Fishery Habitat During Construction and Development Works at River Sites’*. The IFI should be consulted prior to the submission of any plans involving works close to waterways.**

9. Noted.
10. Noted.
11. **It is recommended that a statement in the preface and Section 1.8.4 stating that *“The objectives and policies set out in this document must be read together and not in isolation when considering development proposals within the functional areas that make up County Monaghan Local Authorities”* should be included within the development plan.**
12. It is considered that reference to fish stocks is outside the remit of the development plan.
13. Reference to angling is made in tourism Policy TMO8.
14. It is considered that reference to fish stocks is outside the remit of the development plan.
15. Reference to angling is made in tourism Policy TMO8.
16. It is considered that reference to fish stocks is outside the remit of the development plan.
17. It is considered that Objective CBO3 sufficiently addresses this issue.
18. **It is recommended that the Environmental Report considers the impact upon surface and ground water flows in respect of practices such as water abstraction and effluent discharge.**
19. Noted and agreed.

5.20	Submission Ref:	DMCDP20
	Person/Body:	Roisin McGeough
	Location:	Bawn
	Core Issue:	Bawn as a Tier 6 Settlement

Points Raised

1. Ms. McGeough is objecting to Bawn being listed as a Tier 6 Settlement as it will encourage new housing including social housing.
2. The Bawn Housing and Community Association do not represent the majority of the residents living in Bawn. The Association did not consult with the wider community regarding a planning application for 16 council houses. After opposition from the wider Bawn community, a second planning application for 8 houses was submitted and approved.
3. Bawn has no shop, school, preschool or transport to towns or medical facilities.
4. It would make sense to build council houses closer to urban areas. Monaghan County Council should use a common sense approach and include a policy to prevent any more social housing in isolated rural areas such as Bawn.

Response of the Manager

1. It is expected that the majority of development taking place in Tier 6 settlements will be single dwellings. Section 3.4.5 states that development in Tier 6 settlements will be restricted to single dwellings. Where housing developments are proposed in Tier 6 settlements, the onus will be upon the developer to justify the demand for the housing proposed, the development shall be centred on the focal point of the settlement, and shall be subject to the satisfactory provision of infrastructure and services. All proposals for residential development within Tier 6 settlements will be subject to Policy CSP2 which requires, amongst other criteria, that it reflects the nature, scale and form of existing development within the settlement. **To provide clarity it is recommended that final paragraph of Section 3.4.5 be amended to state “To ensure new residential development is commensurate with anticipated housing demand in Tier 5 and Tier 6 settlements, only small scale housing developments will be permitted in those settlements now designated as Tier 5, and residential development in Tier 6 settlements will *generally* be restricted to single dwellings only.”**
2. Noted.
3. Noted.
4. The provision of an acceptable standard of housing for all is a core aspiration of public policy. The Department of Environment, Community and Local Government’s Housing

Policy Statement, 2011, indicates that the overarching aim of national housing policy is now to enable all households to access good quality housing which is appropriate to household circumstances in their community of choice. Therefore where a demand for housing arises there is an onus for the local authority to seek to satisfy that demand. In addition, the consolidation of existing settlements is fundamental in achieving sustainable development, assists in encouraging the retention of local services and in attracting new additional local services, and offers an alternative to rural housing, particularly in areas which have sensitive ground and surface water, where a proliferation of on site effluent treatment plants can be problematic in terms of water quality.

5.21 Submission Ref: DMCDP21
Person/Body: John McGeough
Location: Bawn
Core Issue: Bawn as a Tier 6 Settlement

Points Raised

1. Mr. McGeough is objecting to Bawn being listed as a Tier 6 Settlement as it will encourage new housing including social housing.
2. The Bawn Housing and Community Association do not represent the majority of the residents living in Bawn. The Association did not consult with the wider community regarding a planning application for 16 council houses. After opposition from the wider Bawn community, a second planning application for 8 houses was submitted and approved.
3. Bawn has no shop, school, preschool or transport to towns or medical facilities.
4. It would make sense to build council houses closer to urban areas. Monaghan County Council should use a common sense approach and include a policy to prevent any more social housing in isolated rural areas such as Bawn.

Response of the Manager

Refer to response given in respect of Submission DMCDP20.

5.22 Submission Ref: DMCDP22
Person/Body: Rosemary McGeough
Location: Bawn
Core Issue: Bawn as a Tier 6 Settlement

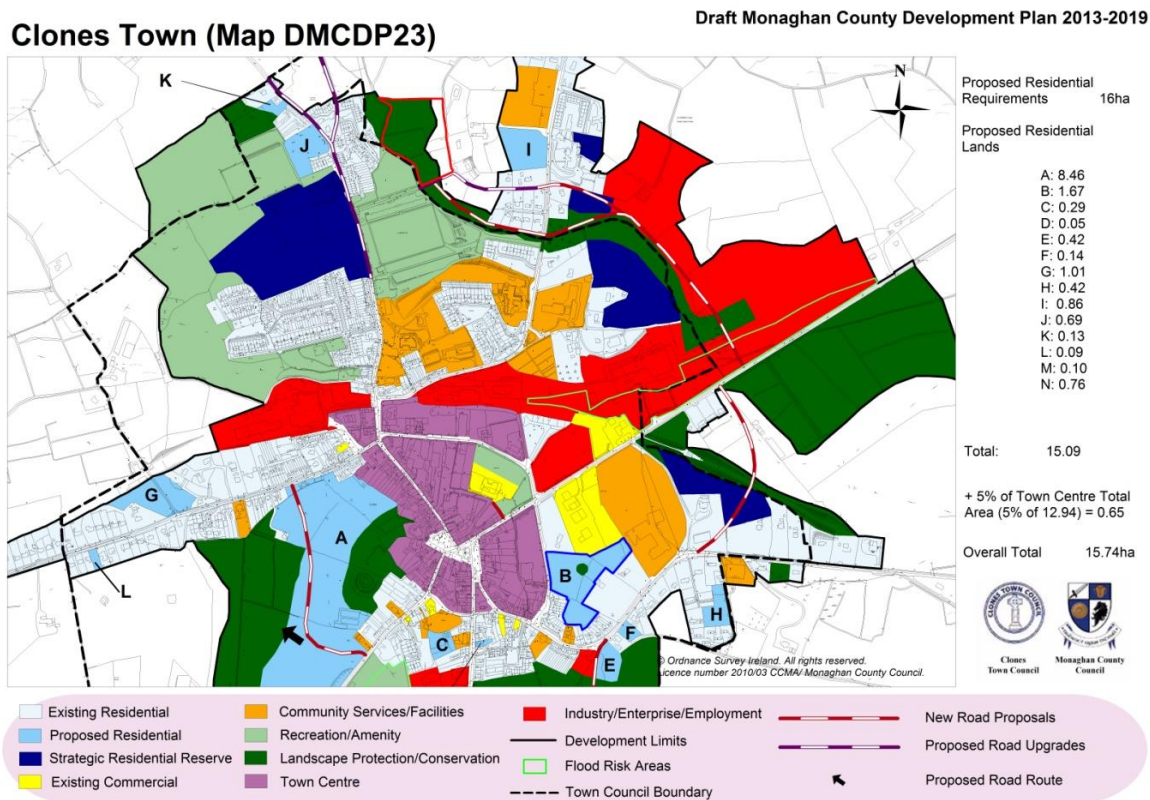
Points Raised

1. Ms. McGeough is objecting to Bawn being listed as a Tier 6 Settlement as it will encourage new housing including social housing.
2. The Bawn Housing and Community Association do not represent the majority of the residents living in Bawn. The Association did not consult with the wider community regarding a planning application for 16 council houses. After opposition from the wider Bawn community, a second planning application for 8 houses was submitted and approved.
3. Bawn has no shop, school, preschool or transport to towns or medical facilities.
4. It would make sense to build council houses closer to urban areas. Monaghan County Council should use a common sense approach and include a policy to prevent any more social housing in isolated rural areas such as Bawn.

Response of the Manager

Refer to response given in respect of Submission DMCDP20.

5.23 Submission Ref: DMCDP23
 Person/Body: John Clerkin
 Location: Clonkeencole, Clones – refer to Map DCMDP23
 Core Issue: Zoning of Lands for Housing



Points Raised

1. The subject lands were zoned for 'Higher Density Housing' in the current Plan, however in the proposed plan the subject land is designated for 'Landscape Protection and Flood Risk'. It is Mr. Clerkin's proposal that the lands or part thereof be considered for housing development.
2. This proposal is due to the subject lands' proximity to urban amenities, water, electricity, sewerage and being within walking distance to the town centre.
3. Mr. Clerkin believes that the land is of "very low flood risk" due to the natural fall of the water-flow in drains going in the direction of the Roslea Road and flowing to the Monaghan Road.
4. Mr. Clerkin feels that alternative sites designated as 'Proposed Residential' such as Plot B, may prove inaccessible or awkward to develop.

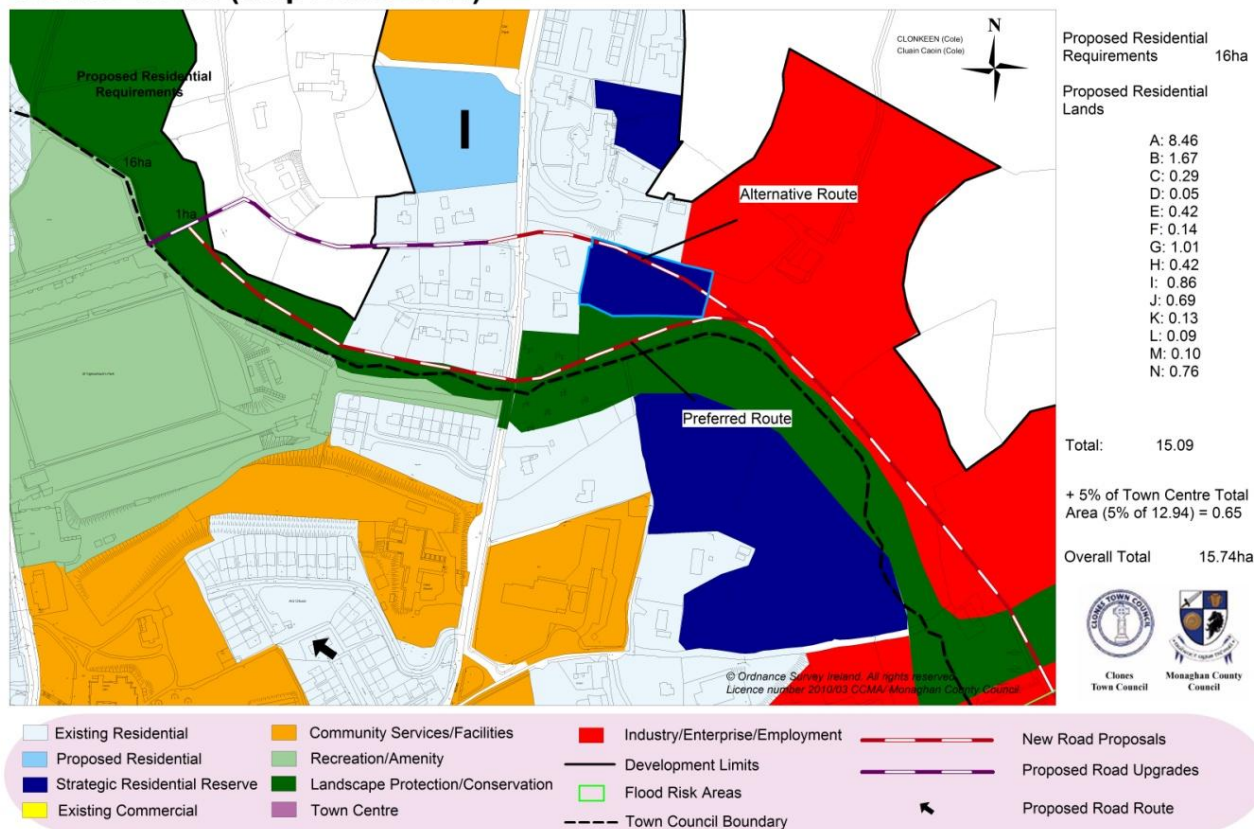
Response of the Manager

1. Noted. The subject lands are designated as having the potential to flood or to cause flooding elsewhere if developed, based on empirical evidence, projections and forecasts, information from the Office of Public Works and as a precautionary approach, it was decided to designate this land as 'Landscape Protection/Conservation'. Policies for Flooding contained within Chapter 6 of the Draft Monaghan County Development Plan 2013-2019 seek to 'prohibit development which would be directly exposed to flooding or which would exacerbate flooding in areas outside of the site of the proposed development itself'.
2. Noted.
3. Noted. As point 1 above.
4. Noted. The Draft Monaghan County Development Plan 2013-2019 seeks to consolidate the existing footprint of the built urban area, and sites have been chosen for residential use with the aim of consolidating the settlements by encouraging development on vacant plots within the urban footprint. Due to its proximity to the town centre and amenities, it is considered that Plot B (outlined in blue on Map DMCDP23), would represent a sustainable form of development. Although there are steep gradients up to Plot B from the public road, it is considered that an access can be achieved. **For this reason and the reasons set out in points 1, and 3 above the lands should be excluded from residential land use zoning and remain zoned as 'Landscape Protection/Conservation'.**

5.24 Submission Ref: DMCDP24
 Person/Body: Emer Bannigan
 Location: Clonkeencole, Clones – refer to Map DCMDP24
 Core Issue: Route of New Road Proposal

Clones Town (Map DMCDP24)

Draft Monaghan County Development Plan 2013-2019



Points Raised

1. Mrs. Bannigan proposes that the proposed road (identified on Map DMCDP24) be altered to run closer to the adjoining site, which is the elderly persons home.
2. Mrs. Bannigan would also like an access point to be considered to serve the lands, designated 'Strategic Residential Reserve'. (outlined in blue on Map DMCDP24)

Response of the Manager

Having reviewed this proposal, it is considered that due to topographical constraints it would not be possible to progress this road. Therefore it is recommended that this proposed road be excluded from the development plan.

5.25 Submission Ref: DMCDP25
Person/Body: Joseph Crawford
Location: Bawn
Core Issue: Social Housing/Street Lighting

Points Raised

1. Mr. Crawford enquires as to the possibility of ensuring development takes place in town centres, and particularly making use of unwanted or derelict sites for social housing.
2. The implementation of street lighting on the outskirts of towns creates visual and light pollution. Mr. Crawford recommends that black Victorian style lighting would be more suitable, particularly in an area like Bawn.

Response of the Manager

1. The provision of an acceptable standard of housing for all is a core aspiration of public policy. The Department of Environment, Community and Local Government's Housing Policy Statement, 2011, indicates that the overarching aim of national housing policy is now to enable all households to access good quality housing which is appropriate to household circumstances in their community of choice. Therefore, where a demand for housing arises there is an onus for the local authority to seek to satisfy that demand.
2. It is accepted that street lighting can cause some visual and light pollution. However, in the interests of both pedestrian and road safety it is necessary that it be implemented to an acceptable design standard where appropriate. **Although Policy ASP10 seeks to ensure lighting does not distract road users, it is recommended that this policy is amended to state "All external lighting shall be cowled and directed away from the public roadway. *External lighting must be designed and installed to ensure that light spillage beyond the area proposed to be illuminated is minimised.*"**

. 5.26 Submission Ref: DMCDP26
Person/Body: Patricia McGeough
Location: Bawn
Core Issue: Bawn as a Tier 6 Settlement

Points Raised

1. Ms. McGeough is objecting to Bawn being listed as a Tier 6 Settlement as it will encourage new housing including social housing.
2. The Bawn Housing and Community Association do not represent the majority of the residents living in Bawn. The Association did not consult with the wider community regarding a planning application for 16 council houses. After opposition from the wider Bawn community, a second planning application for 8 houses was submitted and approved.
3. Bawn has no shop, school, preschool or transport to towns or medical facilities.
4. It would make sense to build council houses closer to urban areas. Monaghan County Council should use a common sense approach and include a policy to prevent any more social housing in isolated rural areas such as Bawn.

Response of the Manager

Refer to response given in respect of Submission DMCDP20.

5.27 Submission Ref: DMCDP27
Person/Body: Seamus McGeough
Location: Bawn
Core Issue: Bawn as a Tier 6 Settlement

Points Raised

1. Mr. McGeough is objecting to Bawn being listed as a Tier 6 Settlement as it will encourage new housing including social housing.
2. The Bawn Housing and Community Association do not represent the majority of the residents living in Bawn. The Association did not consult with the wider community regarding a planning application for 16 council houses. After opposition from the wider Bawn community, a second planning application for 8 houses was submitted and approved.
3. Bawn has no shop, school, preschool or transport to towns or medical facilities.
4. It would make sense to build council houses closer to urban areas. Monaghan County Council should use a common sense approach and include a policy to prevent any more social housing in isolated rural areas such as Bawn.

Response of the Manager

Refer to response given in respect of Submission DMCDP20.

5.28 Submission Ref: DMCDP28
Person/Body: Jacinta Long
Location: Bawn
Core Issue: Bawn as a Tier 6 Settlement

Points Raised

1. The existing social housing development at Bawn has not fulfilled any of the points put forward by Bawn Housing and Community Association to support the development in 2005.
2. The Bawn Housing and Community Association did not carry out any pre-submission consultation with the wider community in 2005.
3. Social housing in such a remote part of the county creates difficulties for established residents and for those parachuted in by the Council or other providers of social housing.
4. There is a large burden put on socially disadvantaged families as they have no access to shops, buses, schools, local authorities and travel costs are higher.
5. Ms. Long indicates that it may be better to re-house persons into vacant houses within larger towns and cities where there would be chances of finding employment.

Response of the Manager

1. Noted.
2. Noted.
3. Noted.
4. Noted.
5. Monaghan County Council recognises that there are a number of vacant and unfinished residential developments in the county. Notwithstanding this, there is uncertainty as to whether or not these developments will be completed and/or when they will be available for occupation. In addition, the provision of an acceptable standard of housing for all is a core aspiration of public policy. The Department of Environment, Community and Local Government's Housing Policy Statement, 2011, indicates that the overarching aim of national housing policy is now to enable all households to access good quality housing which is appropriate to household circumstances in their community of choice. Therefore where a demand for housing arises there is an onus for the local authority to seek to satisfy that demand.

5.29 Submission Ref: DMCDP29
Person/Body: McArdle Family
Location: Bawn
Core Issue: Bawn as a Tier 6 Settlement

Points Raised

1. The McArdle Family suggest that additional council housing is proposed for the Bawn area.
2. There is a lack of amenities/facilities in the area. This puts additional pressure on people on tight budgets with regard to travel costs.
3. There are additional dangers in the countryside, for example cattle, bulls, tractors and machinery.
4. Council houses area better suited in towns.

Response of the Manager

1. Monaghan County Council has no proposals for additional council housing in Bawn.
2. Noted.
3. This issue falls outside the remit of development plan.
4. The provision of an acceptable standard of housing for all is a core aspiration of public policy. The Department of Environment, Community and Local Government's Housing Policy Statement, 2011, indicates that the overarching aim of national housing policy is now to enable all households to access good quality housing which is appropriate to household circumstances in their community of choice. Therefore where a demand for housing arises there is an onus for the local authority to seek to satisfy that demand.

5.30	Submission Ref:	DMCDP30
	Person/Body:	Gerard Nolan
	Location:	Bawn
	Core Issue:	Bawn as a Tier 6 Settlement

Points Raised

1. Mr. Nolan would like Bawn to be removed from the Tier 6 settlement hierarchy as a settlement suitable for further development.
2. Bawn Housing and Community Association made a mistake when they supported the social housing project in Bawn in 2005. The development has failed to create a focal point, sustain population growth in the area, strengthen the existing Bawn handball club, support local business nor has it increased community interaction and has detracted from the community.
3. The Bawn Housing and Community Association did not carry out any pre-submission consultation with the wider community of Bawn. They do not speak for the community of Bawn and the persons involved do not live in or near to the existing housing scheme.
4. Housing schemes should be concentrated near existing town centres where people have access to everyday services. Social housing in such a remote and isolated part of the county places a burden on socially disadvantaged families.
5. Bawn does not have shops, post offices, community centre, schools, leisure facilities, transport systems, health systems or any amenities in the area.
6. The Health Service Executive (HSE) stated the following in their submission to the County Council in 2011 "The HSE believes that development should be concentrated in the County's larger settlements in or near existing town centres at the expense of relatively inaccessible locations where access is poor or infrastructure is inadequate and unlikely to be delivered in the lifetime of the 'new' plan".

Response of the Manager

1. Noted.
2. Noted.
3. Noted.
4. It is expected that the majority of development taking place in Tier 6 settlements will be single dwellings. Section 3.4.5 states that development in Tier 6 settlements will be restricted to single dwellings. Where housing developments are proposed in Tier 6 settlements, the onus will be upon the developer to justify the demand for the housing proposed, the development shall be centred on the focal point of the settlement, and shall be subject to the satisfactory provision of infrastructure and services. All proposals for

residential development within Tier 6 settlements will be subject to Policy CSP2 which requires, amongst other criteria, that it reflects the nature, scale and form of existing development within the settlement. In addition, the provision of an acceptable standard of housing for all is a core aspiration of public policy. The Department of Environment, Community and Local Government's Housing Policy Statement, 2011, indicates that the overarching aim of national housing policy is now to enable all households to access good quality housing which is appropriate to household circumstances in their community of choice. Therefore where a demand for housing arises there is an onus for the local authority to seek to satisfy that demand. **To provide clarity it is recommended that final paragraph of Section 3.4.5 be amended to state "To ensure new residential development is commensurate with anticipated housing demand in Tier 5 and Tier 6 settlements, only small scale housing developments will be permitted in those settlements now designated as Tier 5, and residential development in Tier 6 settlements will *generally* be restricted to single dwellings only."**

5. Noted.
6. Noted. It is expected that the majority of development taking place in Tier 6 settlements will be single dwellings. Section 3.4.5 states that development in Tier 6 settlements will be restricted to single dwellings. Where housing developments are proposed in Tier 6 settlements, the onus will be upon the developer to justify the demand for the housing proposed, the development shall be centred on the focal point of the settlement, and shall be subject to the satisfactory provision of infrastructure and services. All proposals for residential development within Tier 6 settlements will be subject to Policy CSP2 which requires, amongst other criteria, that it reflects the nature, scale and form of existing development within the settlement.

5.31 Submission Ref: DMCDP31
Person/Body: Patricia Wrightson
Location: Bawn
Core Issue: Bawn as a Tier 6 Settlement

Points Raised

1. Ms. Wrightson requests that no further social housing should take place within Bawn.
2. Bawn should not be designated as a Tier 6 Settlement.
3. Bawn is not a suitable place for social housing. Social housing will not be beneficial to the existing community. There are additional cost factors if social housing were to be developed.
4. Bawn has no services, for example bus services, schools, doctor, medical centre, shops, post offices.
5. People who would settle if the plan were to succeed are financially disadvantaged and social services will have to provide for them at a cost.
6. There are no industries or jobs in the area.
7. People who are on benefits will require services including transport services. Ms. Wrightson queries as to whether the County Council will be supplying cars.
8. Social housing schemes should be located within towns where the necessary facilities exist.
9. Bawn is a farming community,
10. Bawn is a wildlife sanctuary and should not be spoilt with this kind of development.
11. There is an issue with poachers on Lough Bawn Estate and this development will create social problems.
12. This development will be a drain on the Taxpayer.

Response of the Manager

1. Noted. It is expected that the majority of development taking place in Tier 6 settlements will be single dwellings. Section 3.4.5 of the development plan states that development in Tier 6 settlements will be restricted to single dwellings. Where housing developments are proposed in Tier 6 settlements, the onus will be upon the developer to justify the demand for the housing proposed, the development shall be centred on the focal point of the settlement, and shall be subject to the satisfactory provision of infrastructure and services. All proposals for residential development within Tier 6 settlements will be subject to Policy CSP2 which requires, amongst other criteria, development which reflects the nature, scale and form of existing development within the settlement. **To provide clarity it is recommended that final paragraph of Section 3.4.5 be amended to state “To ensure**

new residential development is commensurate with anticipated housing demand in Tier 5 and Tier 6 settlements, only small scale housing developments will be permitted in those settlements now designated as Tier 5, and residential development in Tier 6 settlements will *generally* be restricted to single dwellings only.“

2. Bawn has historically been a rural focal point at a crossroads, having a number of community facilities such as a church, a parochial hall, a handball alley, a public house and a post office in its vicinity. Bawn as a rural focal point would be considered to constitute a Dispersed Rural Community or Tier 6 settlement as set out in Chapter Three of the Monaghan County Development Plan 2013-2019. Therefore Bawn is considered to be a settlement.
3. The provision of an acceptable standard of housing for all is a core aspiration of public policy. The Department of Environment, Community and Local Government's Housing Policy Statement, 2011, indicates that the overarching aim of national housing policy is now to enable all households to access good quality housing which is appropriate to household circumstances in their community of choice. Therefore where a demand for housing arises there is an onus for the local authority to seek to satisfy that demand.
4. Noted.
5. Noted.
6. Noted.
7. Noted.
8. The provision of an acceptable standard of housing for all is a core aspiration of public policy. The Department of Environment, Community and Local Government's Housing Policy Statement, 2011, indicates that the overarching aim of national housing policy is now to enable all households to access good quality housing which is appropriate to household circumstances in their community of choice. Therefore where a demand for housing arises there is an onus for the local authority to seek to satisfy that demand.
9. Noted.
10. Noted.
11. This issue falls outside the remit of development plan.
12. This issue falls outside the remit of development plan.

;5.32 Submission Ref: DMCDP32
Person/Body: Geoffrey Quinn
Location: Bawn
Core Issue: Bawn as a Tier 6 Settlement

Points Raised

1. Mr. Quinn requests that no further social housing should take place within Bawn.
2. Bawn should not be designated as a Tier 6 Settlement.
3. Bawn is not a suitable place for social housing. Social housing will not be beneficial to the existing community. There are additional cost factors if social housing were to be developed in Bawn.
4. Bawn has no services, for example bus services, schools, doctor, medical centre, shops, post offices.
5. People who would settle if the plan were to succeed are financially disadvantaged and social services will have to provide for them at a cost.
6. Bawn is a wildlife sanctuary and should not be spoilt with this kind of development.
7. Social housing schemes should be located within towns where the necessary facilities exist.
8. This is a money grabbing exercise by would be landowners for their own financial gain.
9. Bawn is a farming community and there is no work in the area.
10. This development will be a drain on the Taxpayer.

Response of the Manager

1. Monaghan County Council has no proposals to provide additional social housing in Bawn.
2. Bawn has historically been a rural focal point at a crossroads, having a number of community facilities such as a church, a parochial hall, a handball alley, a public house and a post office in its vicinity. Bawn as a rural focal point would be considered to constitute a Dispersed Rural Community or Tier 6 settlement as set out in Chapter Three of the Monaghan County Development Plan 2013-2019. Therefore Bawn is considered to be a settlement.
3. The provision of an acceptable standard of housing for all is a core aspiration of public policy. The Department of Environment, Community and Local Government's Housing Policy Statement, 2011, indicates that the overarching aim of national housing policy is now to enable all households to access good quality housing which is appropriate to household circumstances in their community of choice. Therefore where a demand for housing arises there is an onus for the local authority to seek to satisfy that demand.
4. Noted.

5. Noted.
6. Noted.
7. The provision of an acceptable standard of housing for all is a core aspiration of public policy. The Department of Environment, Community and Local Government's Housing Policy Statement, 2011, indicates that the overarching aim of national housing policy is now to enable all households to access good quality housing which is appropriate to household circumstances in their community of choice. Therefore where a demand for housing arises there is an onus for the local authority to seek to satisfy that demand.
8. Noted.
9. Noted.
10. This issue falls outside the remit of development plan.

5.33 Submission Ref: DMCDP33
Person/Body: Irish Historic Houses Association
Location: Bawn
Core Issue: Bawn as a Tier 6 settlement

Points Raised

1. Objecting to the proposal to include Bawn as a Tier 6 settlement.
2. In 2005 Monaghan County Council granted a Part 8 permission for an eight unit social housing development.
3. In the Monaghan County Development Plan 2007-2013 Bawn was designated as a Tier 5 village with some 40 acres of land zoned for development. No development took place and it was assumed that the proposals had been dropped due to the change in economic circumstances but this has not been the case.
4. There is currently no village at Bawn. The economy of the area is dependent on agricultural and it is unlikely that there could ever be a demand for additional housing at the level suggested or for the creation of what is effectively a new village in a remote rural location without amenities , employment opportunities and a lack of public transport.
5. The Tier 6 proposals would permit and encourage both individual housing units and commercial residential development over an extended and undefined area. The proposal completely disregards the historic, cultural and ecological significance of the area and the damaging effects of development in a sensitive environment.
6. The house of Lough Bawn is a protected structure. The estate includes a number of lakes and important woodlands and is adjacent to the Lisiniskey Bog. Indeed the whole Lough Bawn- Derrygoony area is described in detail in the Co. Monaghan Wetland Survey.
7. The proposal to allow development within sight of one of the lakes will compromise the integrity of it for all time. In addition it also has the potential to create lasting damage to the sensitive ecology of the unspoilt region including the likelihood of damage or pollution to Lisiniskey Marsh.
8. The proposal also raises public health issues given that the Black and Lough Bawn lakes, which are both proposed Natural Heritage Areas area also used for the abstraction of drinking water by a local water scheme and are fed by streams from the Lisiniskey Marsh and surrounding bogs,
9. The proposed areas area adjacent to a plan designated Area of Secondary Amenity Value (Derrygooney Park and Environs) and are within one plan designated view from Scenic routes (Lough Bawn) and are adjacent to another plan designed view from scenic routes (Shantonagh and Corlat) and are adjacent to the Lough Bawn Demesne.

10. The proposed development will take place within an area of Extreme Vulnerability or High Vulnerability (Map 4.3) within the Outer Catchment Area (Map 4.1) and are indicated as significant areas of natural vegetation on the plans Areas of Natural Vegetation (Map 4.5).
11. The lands are within the Kappagh Water riparian corridor, eighteen interconnected lakes that stretch for five miles between Shantonagh Lake and Derrygooney Lake before feeding into the Lough Erne system.
12. The draft development plan's criteria for Tier 6 settlements only apply to the extension and enlargement of an established historic village and are meaningless in the context of the current proposal which effectively recommends and promotes the creation of an entirely new village on a greenfield site.
13. The rationale and viability of the proposal is difficult to comprehend especially as the proposed settlement is within a Structurally Weak Rural Area where there is a presumption in favour of ensuring that all new development should be demand-led.
14. It is worrying that Tier 6 settlements do not include a development limit especially considering that the plan does not contain either a needs based assessment or a mechanism to contain the spread of new housing in an area of un-serviced farmland or indeed to prevent pollution and damage to the surrounding proposed Natural Heritage Area, wetlands and watercourses.
15. This proposal if permitted, will compromise one of Ireland's more fragile environments without any obvious economic advantages and without any clear indication that there is a demand for housing in the area.
16. Monaghan County Council should reject the proposal

Response of the Manager

1. Bawn has historically been a rural focal point at a crossroads, having a number of community facilities such as a church, a parochial hall, a handball alley, a public house and a post office in its vicinity. Bawn as a rural focal point would be considered to constitute a Dispersed Rural Community or Tier 6 settlement as set out in Chapter Three of the Monaghan County Development Plan 2013-2019.
2. Noted.
3. Section 3.4.2 of the draft development plan acknowledges that some settlements which were designated as Tier 5 in the previous county development plan experienced little or no development. As a consequence development envelopes have been removed and development which is of an appropriate size and nature in these settlements will be facilitated in order to consolidate and strengthen their role.

4. Section 3.4.4 of the draft development plan notes that the character of Tier 6 settlements, which are also referred to as dispersed rural communities, mirrors the rural countryside but have scattered individual houses with some clustering around one or more focal points. It is expected that the majority of development taking place in Tier 6 settlements will be single dwellings. Section 3.4.5 states that development in Tier 6 settlements will be restricted to single dwellings. Where housing developments are proposed in Tier 6 settlements, the onus will be upon the developer to justify the demand for the housing proposed, the development shall be centred on the focal point of the settlement, and shall be subject to the satisfactory provision of infrastructure and services. All proposals for residential development within Tier 6 settlements will be subject to Policy CSP2 which requires, amongst other criteria, that development reflects the nature, scale and form of existing development within the settlement. **To provide clarity it is recommended that final paragraph of Section 3.4.5 be amended to state “To ensure new residential development is commensurate with anticipated housing demand in Tier 5 and Tier 6 settlements, only small scale housing developments will be permitted in those settlements now designated as Tier 5, and residential development in Tier 6 settlements will *generally* be restricted to single dwellings only.”**
5. Section 3.4.5 states that development in Tier 6 settlements will be restricted to single dwellings. Where housing developments are proposed in Tier 6 settlements, the onus will be upon the developer to justify the demand for the housing proposed, the development shall be centred on the focal point of the settlement, and shall be subject to the satisfactory provision of infrastructure and services. All proposals for residential development within Tier 6 settlements will be subject to Policy CSP2 which requires, amongst other criteria, that it reflects the nature, scale and form of existing development within the settlement. **To provide clarity it is recommended that final paragraph of Section 3.4.5 be amended to state “To ensure new residential development is commensurate with anticipated housing demand in Tier 5 and Tier 6 settlements, only small scale housing developments will be permitted in those settlements now designated as Tier 5, and residential development in Tier 6 settlements will *generally* be restricted to single dwellings only.”**
6. Noted.
7. It is considered that the consideration of Bawn as a Tier 6 in the development plan will not result in the loss of ecology surrounding Lough Bawn, given the objectives and policies in respect of water quality and ecology protection in the remainder of the development plan.
8. The draft development plan contains objectives and policies which protect designated sites including proposed natural heritage areas and water quality.

9. The draft development plan contains objectives and policies which seek to protect Areas of Secondary Amenity Value and views from scenic routes.
10. The draft development plan contains objectives and policies which seek to protect water quality and landscape protection.
11. Noted.
12. Section 3.4.5 states that development in Tier 6 settlements will be restricted to single dwellings. Where housing developments are proposed in Tier 6 settlements, the onus will be upon the developer to justify the demand for the housing proposed, the development shall be centred on the focal point of the settlement, and shall be subject to the satisfactory provision of infrastructure and services. All proposals for residential development within Tier 6 settlements will be subject to Policy CSP2 which requires, amongst other criteria, that it reflects the nature, scale and form of existing development within the settlement. **To provide clarity it is recommended that final paragraph of Section 3.4.5 be amended to state “To ensure new residential development is commensurate with anticipated housing demand in Tier 5 and Tier 6 settlements, only small scale housing developments will be permitted in those settlements now designated as Tier 5, and residential development in Tier 6 settlements will *generally* be restricted to single dwellings only.”**
13. Structurally Weak Rural Areas have characteristics such as persistent and significant population decline, low population density and a weaker economic structure. Such areas are at risk of losing the level of population necessary to sustain essential services such as schools and local shops and sporting clubs which leads to difficulties in supporting a sustainable and vibrant rural community. In an attempt to address these problems and develop sustainable rural communities demand for permanent residential development in such areas will be accommodated. As indicated within Section 3.4.5, the majority of development within Tier 6 settlements will be restricted to single dwellings and furthermore all planning applications for residential development within Tier 6 settlements will be subject to policy CSP2. **To provide clarity it is recommended that final paragraph of Section 3.4.5 be amended to state “To ensure new residential development is commensurate with anticipated housing demand in Tier 5 and Tier 6 settlements, only small scale housing developments will be permitted in those settlements now designated as Tier 5, and residential development in Tier 6 settlements will *generally* be restricted to single dwellings only.”**
14. Section 3.4.2 of the draft development plan acknowledges that some settlements which were designated as Tier 5 in the previous county development plan experienced little or no development. As a consequence development envelopes have been removed and

development which is of an appropriate size and nature in these settlements will be encouraged in order to consolidate and strengthen their presence.

15. The draft county development plan contains a significant number of objectives and policies for the protection of water quality, biodiversity and landscape.

16. Noted.

5.34	Submission Ref:	DMCDP34
	Person/Body:	Jack Tenison
	Location:	Bawn
	Core Issue:	General Submission with regard to Draft Development Plan and Bawn as a Tier 6 settlement.

Points Raised

1. Overall the plan is a useful plan. Chapter 4 in particular is predictably thoughtful.
2. The context of the draft development plan 2013-2019 is the previous county development plan 2007-2013 which displayed an egregious lack of rigour in its planning principles and grossly over estimated the development potential for the county. The plan was called in by the Minister and it would be unfortunate if the Council consider that a change in government endorsed a return to former ways. The previous plan may have been legally invalid.
3. The draft development plan recognises the incompatibility of the aspiration to promote town centres and to diffuse development. Whilst the plan recognises this contradiction it seeks to re-establish it at the core of its policy. The Council cannot promote both.
4. It is common-sense that a diffuse strategy is more burdensome both to the users of such facilities and to the council which is obliged to maintain the common infrastructure. It is evident that the operational costs of living or working in a remote area can be higher than those in a hub and that the greater the scattered development the greater the requirement on the council to maintain roads, utilities and facilities to an equally high standard to reflect the level of use.
5. There is also a financial and logistical limit to the provision of social infrastructure such as surgeries, shops or community centres despite the Council accepting that it is difficult to maintain the economic and social justification for a full range of facilities within the town centres.
6. The council seem determined to undermine the towns ever more by still advocating a diffuse policy.
7. The basis of planning policy should be need, not demand. Unrealistic aspirations and demand-led development is not proper planning and can act to the detriment of the wider community.
8. If the council used planning policy to focus development in hubs and limit development in remote areas, the council might be able to allocate a hierarchy of infrastructure provision. In promoting a diffuse development strategy the council is increasing its own financial obligations whilst its capacity to meet the obligations is under threat.

9. In seeking to provide an equity of planning opportunity based on demand, the council may be failing in its obligation to allocate resources in a sustainable and deliverable manner and may find itself unable to meet its statutory obligations.
10. In proposing a draft development which is based on an inherent contradiction, which may be vulnerable to challenge at a national or European level, the Council may be proposing something which cannot be delivered.
11. Submission refers to mentions of obtaining critical mass in Section 2.1 of the draft development plan.
12. Submission quotes section 3.4.6 of the draft development plan “there must be cognisance of the need to consolidate urban settlements by keeping them as physically compact as possible and applying the sequential approach to land use zoning. Inappropriately located zoned lands give rise to urban sprawl and increasing services costs” Mr Tenison queries whether outside urban boundaries there is effectively no barrier to development.
13. Submission quotes paragraph 3 of section 3.4.6 of the draft development plan “to ensure that single dwellings in Tier 5 and 6 settlements are directed to appropriate locations, any application shall be determined under policies CSP1 and CSP2. Mr Tenison queries whether a planning application would be refused if it does not comply with policies CSP1 or CSP2.
14. Submission quotes paragraph 3 of section 3.4.8 “in the event that the amount of zoned residential land is insufficient” and claims that this is an opt-out clause which negates the essential purpose of the plan and for which there is neither definition nor justification.
15. Submission states that policies RHP1-13 regarding development located outside settlements indicates a presumption in favour of development.
16. Submission quotes paragraph 1 on page 51 of the draft development plan which refers to Rural Areas Under Strong Urban Influence and states “the increased pressure on the countryside and services etc”. Mr Tenison queries how such a statement refers only to those areas and further adds that as the plan indicates that there is no empirical distinction between rural areas under strong urban influence, stronger rural areas and structurally weak rural areas then “increased pressure on the countryside and services etc” may apply across the county. As a result the submission states that the council may be wrong in implementing differing planning policies for those areas and therefore the presumption in favour of development in RHP11 and RHP13 should not apply as it has no objective planning basis.
17. Statement refers to section 5.10.1 of the draft development and specifically the fundamental objectives which stipulate the promotion of town centres and public transport access to developments.

18. Objectives RTO2, 3, 5 and 7 are directly challenged by continuing with the presumption in favour of development across the entire county other than in Rural Areas Under Strong Urban Influence. The Council recognises that this policy has in the past contributed to the decline of the county towns but it intends to repeat that mistake.
19. Submission refers to paragraphs 3 and 4 of Section 6.2.9 regarding the effects travel and congestion have on business costs and quality of life. Mr Tenison indicates that a continued presumption in favour of scattered development is not an appropriate policy to address this, nor will it help the council achieve Objective RNO5 to “maintain all roads within the county to the appropriate standards”.
20. Submission indicates that objectives SSO1-13 can only be achieved if the council is committed to its Core Strategy. However Chapter 3 of the draft development plan, in particular paragraph 1 of Section 3.2 notes that growth had not occurred in the towns but rather the rural areas around the town.
21. Submission notes that the draft development plan recognises that the dispersed population impacts on the growth and undermines the viability of existing towns and villages (section 3.2.1), has resulted in a further weakening of urban structure and acts as a disincentive for investment in retail and service sectors of the towns (section 8.5). Mr Tenison states that although Monaghan County Council recognises that its planning policy is at fault, it proposes to continue with the same policy.
22. Submission quotes paragraph 1 of section 15.1 of the draft development plan.
23. Submission quotes policies CDP1-4 of the draft development plan.
24. Submission refers to section 16.1.5 “The rural housing policies outlined in the Core Strategy are intended to safeguard the key objectives to i) meet the requirements of the immediate local rural community who have a housing need and ii) direct urban generated rural housing development into the adjoining towns and villages – this directly contradicts CSP2 and RHP 11 and 13 which are demand-led and take no account of need.
25. Submission refers to section 3.2: population statistics.
26. Submission refers to paragraph 30 of Section 3.2.
27. Submission refers to paragraph 3 of Section 3.4.2.
28. Submission refers to Section 3.4.4 on page 44 regarding Tier 6 settlements “the onus will be on the developer to justify the demand for the housing proposed”. Mr Tenison states that the Council proposes that the development be demand led rather than need led and implies that even if there are empty properties and unfinished planning permissions in the area any development might be justified provided a developer wishes to build such housing,
29. Section 3.4.5 of the draft development plan states that extant permissions, unfinished housing developments and vacant properties have been discounted from the calculations

for residential demand/supply. Mr Tenison states that by doing so, Monaghan Council are acknowledging that there maybe be no need for the houses already built, let alone the uncompleted permissions already granted but nonetheless proposed to allow a further 1,915 units based on developer demand.

30. Submission refers to paragraph 3.4.5 and indicates that table 3.13 does not represent the maximum zoning requirement as a result of excluding vacant or unfinished units.
31. Submission queries the relationship between population projections (table 3.9) and target population (table 3.13) and in particular the fact that whilst the county population is predicted to fall the Councils aspiration is for it to increase.
32. Submission queries that the land allocation is almost twice what might be required even for the aspirational increase in population, and that addition further lands on demand are a possibility (section 3.4.8). If more land is provided than is required the council will fail in its core strategy objectives including those of sequence and in-fill (CSP2).
33. Policies CSP2, RHP11 and RHP13 are demand led policies, which are in favour of rural development. These policies take no account of need and are therefore in direct contradiction to the Rural Housing Policies outlined within the Core Strategy which refer to need-based assessment and an urban presumption.
34. The proposed new village at Bawn does not comply with any of the policies and statements regarding Tier 6 settlements which refer to and treat further development as if there was something on which to add to – ie. a settlement already existed. There is and historically has never been a settlement.
35. The Council appears eager to promote Bawn as a new settlement and has without public consultation, placed eight social houses in the area – this does not make a settlement.
36. There is no list or explanation of Tier 5 or Tier 6 settlements other than implied through various maps.
37. Bawn appears to be listed in the same context as Latton, Clontibret or Drum which are clearly well-established villages with a range of facilities and which are of a size and form that bares no relation to Bawn.
38. Settlements which are clearly villages for example Shantonagh, Bellatrain and Aghnamullen are not illustrated on maps, therefore implying that the Council does not consider them settlements.
39. Monaghan County Council does not clarify what a “settlement” is or which settlements are considered to be Tiers 5 and 6 and the reasons thereof.
40. Policy CSP2 states “planning applications will be granted where the proposed development meets all of the following principles” but provides no guidance if the principles are not applicable. The Council’s proposals for Bawn are therefore void for uncertainty.

41. There is no logic or justification within the plan for the creation of a new village at Bawn or its designation as a Tier 6 settlement. There is no economic justification since the creation of a new settlement will only add to the Council's infrastructure burden.
42. An explanation for the designation of Bawn as a Tier 6 settlement may be that the council wishes to extend its social housing scheme. If so Bawn appears a surprising location given its remote nature where there are no shops, public transport, services or jobs.
43. If the Council seeks to provide social housing for local people it would be more sensible to either pay rent for existing rental properties or buy empty properties – both choices are plentiful and cheaper and easier than building new units.
44. There are physical restraints to the area, it is adjacent and connected to a larger marsh, cut by two roads, located between two proposed Natural Heritage Area (pNHA) lakes, one of which is an abstraction source and cannot provide the housing numbers which would be sufficient to accommodate services or facilities. The location and topographical/geophysical constraints mean that a proper village at Bawn is unlikely and would be in breach of national and local guidelines.
45. The promotion of development at Bawn will lead to an increase in the dispersed and unserviced housing which the draft development plan claims is costly, inefficient and seeks to avoid.
46. There are several sections in the draft development plan which would conflict with a new settlement at Bawn including the sensitive location of the area being surrounding by four lakes, two of which are proposed natural heritage areas.
47. Section 4.6.5 of the draft development plan refers to Natural Heritage and how nature needs to be treated sensitively. Mr Tenison queries how a new village in Bawn would comply with this section of the draft plan.
48. Policy BDO4 seeks to promote the retention, management and development of wildlife features. Mr Tenison queries how a new village in Bawn would comply with this section of the draft plan.
49. Policy BDO5 seeks to prevent the spread of invasive species. Mr Tenison queries how a new village in Bawn would comply with this section of the draft plan.
50. Any further development at this location would create significant pollution hazards.
51. Mr Tenison queries how a new village in Bawn would comply with objectives WPO1-5 given that it is a highly sensitive area. In building the eight social houses, the Council has accepted the vulnerability of any development at Bawn to surface water run-off.
52. In proposing to make Bawn a Tier 6 settlement, the Council are implying an unrestricted number of new single or possible multiple dwelling. Mr Tension queries as to how the Council proposes to ensure that such ad-hoc development can guarantee not to affect the sensitive surface water feeder stream which runs through the area.

53. It is highly likely that any further development at Bawn will directly impact upon the water quality of Lough Bawn.
54. Mr Tension queries how the development of a new village at Bawn complies with section GIO1-3 and GIP1.
55. Mr Tension queries how the development of a new village at Bawn complies with section ABO1-5 and ABP1-2.
56. Mr Tension queries how the development of a new village at Bawn complies with Appendix 1 which lists Areas of Secondary Amenity Value.
57. Mr Tension queries how the development of a new village at Bawn complies with policy WLP1 which resists development that would destroy, fragment and degrade wetlands.
58. Mr Tension queries how the development of a new village at Bawn complies with policy WPP6 to prevent the degradation of habitat by the promotion of riparian corridors.
59. Mr Tension queries how the development of a new village at Bawn complies with the protection of Scenic Routes and Areas of Visual Amenity in the draft plan.
60. The Lough Bawn Demesne, which includes two pNHA lakes and numerous Protected Structures, has been designated under Section 482 of the Taxes Consolidation Act.
61. Mr Tension queries how the development of a new village at Bawn complies with the sections of the plan which relate to the protection of landscape.
62. Lisiniskey Marsh is noted in the Monaghan Fen Survey 2007 as of county ecological value. Mr Tension queries how the development of a new village at Bawn complies with policy WLP1 “development that would destroy, fragment and degrade wetlands will be resisted”
63. Bawn lies between Lisinisky Marsh and a water abstraction lake and is set within the boundaries of four pNHA. Mr Tension queries how the development of a new village at Bawn complies with policy WPP6 “prevent further degradation of habitat by the promotion of riparian corridors”.
64. Submission indicates that Map 4.7 indicates that Scenic Routes SV22 and SV23 appear to be located closer to Latton and Lough Egish as opposed to Bawn.
65. Mr Tension queries how the development of a new village at Bawn complies with policy AVP1 to protect the views from scenic routes as listed in appendix 2 and refers specifically to SV22 Shantonagh and Corlat and SV23 Lough Bawn.
66. Mr Tension queries how the development of a new village at Bawn complies with section 4.4, paragraph 5 which states “it is important to note that the European Landscape Convention applies to ordinary landscapes no less than to outstanding ones”
67. Mr Tension queries how the development of a new village at Bawn complies with paragraph 6 of Section 4.4, which states “one of the principal roles of the planning authority is to protect the most sensitive landscapes from intrusive and unsympathetic

development which would irreversibly damage County Monaghan's environment and heritage".

68. The proposed settlement area at Bawn is a green field site apart from eight council units, is located between four proposed Natural Heritage Area lakes, is adjacent to Lisiniskey Marsh and is upstream of a water course which leads directly to a water abstraction lake. Any development would breach Objective LPO2 and Policy LPP2.
69. Mr Tension queries how the development of a new village at Bawn complies with objective TRO2 "promote the integration of land use and transport by encouraging and consolidating development in the existing network of towns and villages".
70. The strategic objectives apply to all settlements but they do not contain reference to the promoting or proposing the creation of new settlements which is what the council proposed with the creation of a new village at Bawn.
71. Submission refers to objective SSO17 which "promotes sustainable compact development forms" and policy CSP2(ii) which states "the development contributes to the sequential development of land from the centre outward". There is no existing village at Bawn and therefore it is difficult to clarify which is meant by "compact" or "sequential" or "outwards" in the context of Bawn.
72. Policy CSP2(i) refers to the "historical development of the settlement" this is not applicable to Bawn as there is no history of a settlement.
73. Policy TVP2 states "the proposed use of any new development should be compatible with the site's location and adjoining uses". This is not applicable to Bawn where the Council is proposing a new village where none existed before.
74. Section 3.4.8, paragraph 7 states that "in the case of Tier 5 and 6 settlements, the absence of a development limit permits the sequential expansion of these villages provided it takes place in a sustainable manner" however policies TVP2 and CSP2 only apply to existing settlements where there is already a "location" and "use"
75. Section 15.1.1 states that "development will not normally be approved where important views would be unduly interrupted or seriously prejudiced or lost. Development on the top of drumlins or on high exposed lands will therefore be restricted to protect locally important views and landmarks". The Bawn area contains two of twenty four views from scenic routes in the county. Bawn cannot therefore be a suitable location for a new village.
76. Paragraph 15.4.3 states "the cumulative impact of a number of buildings on both the visual amenity of the countryside and the rural environment generally can be significant....The planning authority shall continue to resist intensive development in unserviced areas where it would cause a detrimental change to the character of a rural

landscape". The creation of a new village at Bawn does not comply with this section of the plan.

77. Development at Bawn is constrained by a number of policies in the plan and include the following:

- Section 8.5.3 – new housing schemes adjacent to existing and new roads.
- Policy RDP 16 – restrictions on residential units within 100 metres of an agricultural building.
- Policy WLP1 –development that would destroy, fragment and degrade wetlands will be resisted.
- Policy WPP7 - no development will be permitted within 200 metres of any lake which is a source of a water supply.
- Map 4.1 – Bawn is located on the edge of the Inner Catchment Area and within the Outer Catchment Area.
- Map 4.3 – Bawn is located within the Extreme Vulnerability or High Vulnerability.
- Map 4.5 – Bawn is designated as "principally agriculture with significant areas of natural vegetation".
- Map 4.7 – Bawn is located close to an Area of Secondary Amenity Value and two Views from Scenic Routes.
- New development at Bawn is contrary to environmental objective L1 of the SEA To protect and conserve the quality, character and distinctiveness of landscapes and avoid significant adverse impacts on the landscape and is in breach of the target which state4d "no development permitted which results in avoidable visual impacts on the landscape".

78. The entire Tier 6 settlement category is void for uncertainty since it is:

- Insufficiently distinct from uncategorised land
- Ambiguous on the restriction to "single dwellings only"
- Ambiguous on the restriction "expected to be limited and to be mainly in the form of single detached dwellings"
- Ambiguous on the restriction "expected that the majority of the development....will be single dwellings".
- Insufficient definition of "focal points" or "one or more focal points"
- Insufficient definition of "sequential expansion" and "a sustainable manner"

79. The assurance of the County Council that there will be no further social housing in the plan period may only apply until 2019.

80. Mr Tenison is unclear what planning basis, evidence of need or economic rational underpins the decision of Monaghan County Council to create a new settlement in Bawn.

81. There are no policies relating to light quality. Light pollution is an environmental and social concern and there are well established mechanisms for its mitigation. The inefficient or unnecessary provision of light should be an evident cost concern for the council.
82. Employment structure – as well as the usual requirements of property, infrastructure, education, finances etc the quality of the work-play environment is perhaps increasingly important. This is a matter on which the Council can play a role. It can recognise that County Monaghan is a relatively remote and underdeveloped area and that one of the reasons for being in County Monaghan may be the tranquillity and attraction of the countryside. A key ingredient of the planning process should be to recognise the strengths and weakness of the area.
83. Submission quotes section 5.8.3 “only 30% of the graduate population of Monaghan is employed”. Mr Tenison queries whether this means that 70% of graduates are unemployed or that 30% of graduates living in Monaghan area employed.
84. It is questionable to what extent it is value for public money, or fair to other employers and communities to make the promotion of Lough Egish one of the Council’s key eleven objectives.
85. Sustainable tourism is only one aspect of sustainability and is unlikely to be a key economic activity but it might encourage the Council both towards a sustainable mindset across the range of its activities and to appreciate the economic benefits of a long term strategy.
86. The Council may find that job retention is likely to be as important as job creation for the plan period. In that respect the quality of the wider environment may prove as critical an infrastructure as the more obvious issues such as a safe and maintained road network.
87. Smarter Travel aims to “focus population growth in areas of employment and to encourage people to live in close proximity to places of employment”. The council’s development of eight social housing at Bawn is therefore bizarre given its lack of public transport, social or retail facilities, infrastructure and employment.
88. Objectives WSO1-8 for Water Services are useful.
89. There is no reference in the development plan to water conservation. It is in the council’s economic self interest to conserve supplies of water.
90. The council rightly proposes to upgrade connections to the public sewer (WTO3) but fails to mention that large scale development should not be placed where there is no existing sewerage network.
91. The council is to be congratulated on the number and quality of its community opportunities. However Chapter Seven fails to mention that the provision of, maintenance of, and use of such facilities is inevitably limited.

92. Section 15.4 “the quality of development in the countryside cannot be compromised....It is essential that any new dwelling reflects the traditional form of development in the countryside and does not attempt to impose alien or urban standards in the rural environment”. Mr Tension indicates that these statements are reasonable but queries where they are being carried out in practice.

Response of the Manager

1. Noted.
2. Noted. It is accepted that the current development plan has a significant oversupply of zoned land.
3. County Monaghan’s population is dispersed throughout the rural areas with less than 30% of the population living in the urban areas. Section 3.2.1 of the draft development plan recognises that this pattern of dispersed population is very strongly established but impacts upon the growth and the viability of existing towns and villages. The draft development plan recognises that the issue of urban rural balance needs to be addressed. The Settlement/Core Strategy provides a hierarchy of settlements which caters for the balanced and sustainable growth of the county while providing a range of residential units. The Settlement/Core Strategy is based on the following:
 - The promotion and development of Monaghan as a Hub town and as the main residential, retail, service and employment centre in the county.
 - The development of second and third tier towns as residential, retail, service and employment centres
 - Controlled expansion of fourth tier settlements as residential and local retail centres.
 - Careful growth management in ‘rural areas under strong urban influence’
 - Sustainable development of Tier 5 and 6 settlements and the remaining rural areas.
4. Noted.
5. Noted.
6. The Settlement/Core Strategy provides a hierarchy of settlements which caters for the balanced and sustainable growth of the county.
7. Noted.
8. Noted.
9. Noted.
10. Noted.
11. Noted.
12. Residential development in Tiers 4, 5 and 6 will be subject to Policies CSP1 and CSP2. In addition, in accordance with the requirements of the Sustainable Rural Housing Guidelines for Planning Authorities, and to ensure that development in the countryside

outside the planned limits of the settlements takes place in a sustainable manner, which reflects the needs of the rural communities, the county has been divided into three development management zones based on different rural area types.

13. As stipulated within the draft development plan, planning applications for residential development in Tiers 4, 5 and 6 will be granted where the development meets all of the key guiding principles as listed. Where a planning application fails to, the application will be refused.
14. Section 3.4.8 clearly states that the Settlement/Core Strategy will require a “monitor and manage” approach to ensure sufficient supply of residential land to meet housing demand during the period of the development plan. In addition any zoning or additional residential land within an existing development envelope or any extension to an existing development envelope to facilitate additional residential land shall not result in the total amount of land zoned or deemed suitable for residential use exceeding the thresholds of proposed residential zoning as set out in table 3.13 of the draft development plan.
15. In accordance with the requirements of the Sustainable Rural Housing Guidelines for Planning Authorities, and to ensure that development in the countryside outside the planned limits of the settlements takes place in a sustainable manner, which reflects the needs of the rural communities, the county has been divided into three development management zones based on different rural area types.
16. In accordance with the requirements of the Sustainable Rural Housing Guidelines for Planning Authorities, and to ensure that development in the countryside outside the planned limits of the settlements takes place in a sustainable manner, which reflects the needs of the rural communities, the county has been divided into three development management zones based on different rural area types. Policies RHP11 and RHP13 refer to structurally weak rural areas. These areas have characteristics such as persistent and significant population decline, low population density as well as a weaker economic structure. In an attempt to address these problems and develop sustainable rural communities, the planning authority will accommodate demand for permanent residential development in structurally weak areas.
17. Noted.
18. The Settlement/Core Strategy provides a hierarchy of settlements which caters for the balanced and sustainable growth of the county while providing a range of residential houses. The Sustainable Rural Housing Guidelines published by the DEHLG advocate the encouragement of development in structurally weak areas.
19. Monaghan County Council acknowledges the impact congestion has on business costs and the quality of life of car drivers, pedestrians and residents. Consequently policies

have been devised which will address these negative impacts, improve the quality of access and use of the road network throughout the county and its towns.

20. Objectives SSO1-13 seek to ensure the balanced and sustainable development of the county.
21. The Settlement/Core Strategy provides a hierarchy of settlements which caters for the balanced and sustainable growth of the county while providing a range of residential houses. The Sustainable Rural Housing Guidelines published by the DEHLG advocate the encouragement of development in structurally weak areas.
22. Noted.
23. Noted.
24. In accordance with the requirements of the Sustainable Rural Housing Guidelines for Planning Authorities, and to ensure that development in the countryside outside the planned limits of the settlements takes place in a sustainable manner, which reflects the needs of the rural communities, the county has been divided into three development management zones based on different rural area types. Policies RHP11 and RHP13 refer to structurally weak rural areas. These areas have characteristics such as persistent and significant population decline, low population density as well as a weaker economic structure. In an attempt to address these problems and develop sustainable rural communities, the planning authority will accommodate demand for permanent residential development in structurally weak areas.
25. Noted.
26. Noted.
27. Noted.
28. Policy CSP2 states that planning applications for residential development will be granted where the proposed development meets the detailed principles. Criteria (i) of policy CSP2 states “the developer has provided evidence to the satisfaction of the planning authority that there is demand for the proposed residential development in the settlement taking account of the extent, nature and status of extant permissions for residential development and vacant residential properties in the settlement and the historical development of the settlement.
29. Monaghan County Council recognises that there are a number of vacant and unfinished residential developments in the county. Notwithstanding this, there is uncertainty as to whether or not these developments will be completed and/or when they will be available for occupation and therefore they have been discounted from the calculations for residential development demand/supply.
30. Table 3.13 indicates the amount of zoned residential land required to accommodate the projected population growths in Tiers 1-4 in the county by 2019 in accordance with the

DEHLG Development Plan Guidelines for Planning Authorities and the Border Regional Planning Guidelines 2010-2012. Monaghan County Council recognises that there are a number of vacant and unfinished residential developments in the county. Notwithstanding this, there is uncertainty as to whether or not these developments will be completed and/or when they will be available for occupation and therefore they have been discounted from the calculations for residential development demand/supply.

31. Table 3.9 sets out population predictions for the four largest towns in County Monaghan where no objectives or policies are employed to consolidate, re-enforce and grow the main settlements in the county. One of the objectives of the National Spatial Strategy and the Regional Planning Guidelines for the Border Region is to strengthen and grow settlements to ensure they have critical mass and can sustain and add to the services and facilities within them. In addition the Environmental Report produced to inform the development plan objectives and policies stated that dispersed one off rural housing has a number of undesirable environmental consequences. Therefore, it is an objective of the development plan to direct population growth to settlements.
32. In accordance with the Department of Environment, Heritage and Local Government Development Plan Guidelines for Planning Authorities and the Regional Planning Guidelines for the Border Region, the proposed zoning in table 3.13 provides for 50% additional zoning to ensure a properly functioning market for housing land.
33. In accordance with the requirements of the Sustainable Rural Housing Guidelines for Planning Authorities, and to ensure that development in the countryside outside the planned limits of the settlements takes place in a sustainable manner, which reflects the needs of the rural communities, the county has been divided into three development management zones based on different rural area types. Policies RHP11 and RHP13 refer to structurally weak rural areas. These areas have characteristics such as persistent and significant population decline, low population density as well as a weaker economic structure. In an attempt to address these problems and develop sustainable rural communities, the planning authority will accommodate demand for permanent residential development in structurally weak areas.
34. Section 3.4.4 of the draft development plan notes that the character of Tier 6 settlements mirrors the rural countryside but have scattered individual houses with some clustering around one or more focal points. Focal points may include existing development around a cross roads, a shop, church, post office etc. Presently Bawn has both existing housing and a Church which fall within the aforementioned definition of a focal point. Bawn has historically been a rural focal point at a crossroads, having a number of community facilities such as a church, a parochial hall, a handball alley, a public house and a post office in its vicinity. Bawn as a rural focal point would be considered to constitute a

Dispersed Rural Community or Tier 6 settlement as set out in Chapter Three of the Monaghan County Development Plan 2013-2019. Therefore Bawn is considered to be a settlement.

35. Section 3.4.4 of the draft development plan states with regard to Tier 6 settlements that “there may be scope for some additional dwellings to consolidate existing focal points and utilise existing services in the area subject to normal planning and environmental standards.
36. Section 3.4.4 of the draft development plan entitled “settlement hierarchy” and Table 3.11 of the draft development plan provides details of the settlement hierarchy. Tier 1, 2, 3, 4 and 5 settlements are listed and their characteristics detailed.
37. The statement is incorrect. Latton, Clontibret and Drum are clearly established villages and consequently are listed as Tier 5 settlements within the draft development plan. Bawn is listed as a Tier 6 settlement and thus is accepted as being of a different character.
38. Although Shantonagh, Bellatrain and Aghnamullen could be regarded as falling within the category of Tier 6 settlements, they are not specifically identified on maps within the draft development plan. **Therefore to ensure consistency, it is recommended that the settlement of Bawn be removed as a village from the associated maps.**
39. As point 36 above.
40. If the criteria of policy CSP2 are not fully met to the satisfaction of the planning authority, the planning application will be refused.
41. As point 34 above.
42. Monaghan County Council has no plans to increase social housing at Bawn.
43. Noted.
44. The draft development plan contains objectives and policies to protect designated sites, objectives and policies to protect the countryside and the landscape from intrusive development
45. Noted.
46. The draft development plan contains objectives and policies to protect designated sites and to ensure the protection of water quality.
47. The draft development plan contains objectives and policies for the protection of biodiversity and natural heritage.
48. The draft development plan contains objectives and policies to protect both designated and undesignated wildlife habitats.
49. Any residential development proposed within a Tier 6 settlement will be subject to the requirements of the remaining relevant policies contained within the draft development plan.
50. Noted.

51. Any residential development proposed within a Tier 6 settlement will be subject to the requirements of the remaining relevant policies contained within the draft development plan, a number of which relate to the protection of surface water quality.
52. Any residential development proposed within a Tier 6 settlement will be subject to the requirements of the remaining relevant policies contained within the draft development plan including objectives and policies for the protection of water.
53. As point 52 above.
54. Objectives GIO1-3 and Policy GIP1 relate to the provision of green infrastructure in general.
55. Objectives ABO1-5 and Policy ABP1-2 relate to architectural and built heritage in general.
56. The draft development plan contains objectives and policies to protect Areas of Secondary Amenity Value.
57. Any residential development proposed within a Tier 6 settlement will be subject to the requirements of all of the objectives and policies contained within the draft development plan.
58. As point 57 above.
59. As point 57 above.
60. Noted.
61. Any residential development proposed within a Tier 6 settlement will be subject to the requirements of the objectives and policies relating to the protection of landscapes contained within the draft development plan.
62. Any residential development proposed within a Tier 6 settlement will be subject to the requirements of the objectives and policies relating to the protection of wetlands contained within the draft development plan.
63. As point 52 above.
64. Scenic Routes SV22 and SV23 are correctly plotted on Map 4.7.
65. As point 56 above.
66. The draft development plan contains objectives and policies to protect the countryside and the landscape from intrusive development and designates specific landscapes for protection.
67. Any residential development proposed within a Tier 6 settlement will be subject to the requirements of the remaining relevant policies contained within the draft development plan. The draft development plan contains objectives and policies to protect the countryside and the landscape from intrusive development and designates specific landscapes for protection.
68. Any residential development proposed within a Tier 6 settlement will be subject to the requirements of the remaining relevant policies contained within the draft development

plan, a number of which relate to the protection of proposed Natural Heritage Areas, wetlands, water bodies and landscape.

69. Bawn has historically been a rural focal point at a crossroads, having a number of community facilities such as a church, a parochial hall, a handball alley, a public house and a post office in its vicinity. Bawn as a rural focal point would be considered to constitute a Dispersed Rural Community or Tier 6 settlement as set out in Chapter Three of the Monaghan County Development Plan 2013-2019. Therefore Bawn is considered to be a settlement.
70. Presently Bawn has both existing housing and a Church which fall within the aforementioned definition of a focal point. Bawn has historically been a rural focal point at a crossroads, having a number of community facilities such as a church, a parochial hall, a handball alley, a public house and a post office in its vicinity. Bawn as a rural focal point would be considered to constitute a Dispersed Rural Community or Tier 6 settlement as set out in Chapter Three of the Monaghan County Development Plan 2013-2019. Therefore Bawn is considered to be a settlement. Section 3.4.4 states that, with regard to Tier 6 settlements, "there may be scope for some additional dwellings to consolidate existing focal points and utilise existing services in the area subject to normal planning and environmental standards".
71. Bawn as a rural focal point would be considered to constitute a Dispersed Rural Community or Tier 6 settlement as set out in Chapter Three of the Monaghan County Development Plan 2013-2019. Therefore to seek to consolidate the settlement would be a sustainable objective. Development within the village would be required to be in keeping with the existing development to be in compliance with the remaining objectives and policies within the development plan.
72. Noted, however Policy CSP2(i) also refers to the fact that the development must provide evidence to the satisfaction of the planning authority that there is demand for the proposed residential development in the settlement taking account of the extent, nature and status of extant permissions for residential developments, unfinished residential development and vacant residential properties in the settlement.
73. As point 71 above.
74. As point 71 above.
75. As point 56 above.
76. As point 71 above.
77. Noted. Any residential development proposed within a Tier 6 settlement will be subject to the requirements of the remaining relevant policies contained within the draft development plan.

78. Section 3.4.4 of the development plan quite clearly sets out what defines a dispersed rural community or Tier 6 settlement. The scale of development that will be permitted will generally be restricted to single dwellings in a sequential manner that consolidates the settlement. It is not accepted that the draft development plan is ambiguous in this regard.
79. Noted.
80. Bawn has historically been a rural focal point at a crossroads, having a number of community facilities such as a church, a parochial hall, a handball alley, a public house and a post office in its vicinity. Bawn as a rural focal point would be considered to constitute a Dispersed Rural Community or Tier 6 settlement as set out in Chapter Three of the Monaghan County Development Plan 2013-2019. Therefore Bawn is considered to be a settlement. The Settlement/Core Strategy provides a hierarchy of settlements which caters for the balanced and sustainable growth of the county whilst providing a range of residential choices.
81. **Noted. It is acknowledged that light pollution can have a negative impact on the natural environment and on the residential amenities of adjoining areas. Although Policy ASP10 seeks to ensure lighting does not distract road users, it is recommended that this policy is amended to state “All external lighting shall be cowled and directed away from the public roadway. *External lighting must be designed and installed to ensure that light spillage beyond the area proposed to be illuminated is minimised.*”**
82. Noted.
83. It is understood that this figure represents the number of graduates that have remained in County Monaghan and are in employment.
84. Lough Egish has established itself a significant location in the county for the agglomeration of food processing facilities, providing a significant number of jobs. The consolidation of this agglomeration of facilities is considered logical and sustainable.
85. Noted.
86. Noted.
87. The provision of an acceptable standard of housing for all is a core aspiration of public policy. The Department of Environment, Community and Local Government’s Housing Policy Statement, 2011, indicates that the overarching aim of national housing policy is now to enable all households to access good quality housing which is appropriate to household circumstances in their community of choice. Therefore where a demand for housing arises there is an onus for the local authority to seek to satisfy that demand.
88. Noted.
89. **It is recommended that water conservation is referred to and that the following be inserted within Section 6.3.1 of the development plan,**

“Stage 3 of the National Water Conservation Programme as outlined in Department Circular L6/2007 involves the rehabilitation and replacement of defective supply networks. Network rehabilitation will commence in 2013 and build on the Water Conservation Team’s Stage 2 achievements. Monaghan County Council has appointed Consulting Engineers to manage Stage 3 and Works Package 1 will focus on mains replacement / rehabilitation in the following DMA’s (District Meter Areas):

Monaghan Town – MN Town Centre DMA

Monaghan Town – MN Hospital / Milltown Road DMA

Monaghan Town – MN Clones Road DMA

Monaghan Town - MN Derry Road DMA”

90. Policy WTP1 of the draft development plan states “development proposing to connect to the public wastewater treatment systems shall be limited or restricted in those areas where capacity is insufficient to accommodate the demands of the development and where funding is unavailable to increase the capacity of the relevant facility”.
91. Noted. The funding of facilities is outside the remit of the development plan.
92. Proposals for new development will not be permitted unless it complies with all the objectives and policies set out in the development plan.

5.35	Submission Ref:	DMCDP35
	Person/Body:	Jim Coyle
	Location:	Bawn
	Core Issue:	Bawn as a Tier 6 Settlement

Points Raised

1. Bawn is listed as a Tier 6 settlement which will result in the Council continuing to encourage new housing in Bawn.
2. Mr Coyle lists the following reasons as to why additional housing in Bawn should not be considered for additional housing:
 - There are no taxi facilities
 - There are no shops
 - There is no post office
 - There is no Garda station
 - Development will generate additional traffic on local roads.
 - There is no employment in the Bawn area.
 - There are no football pitches.
 - There are no footpaths.
 - There is no handball alley
 - There are no community centres
3. Additional housing will ruin the rural setting of Bawn.
4. Mr Coyle states that his local town is run down given the lack of people in it. Despite this, it has a lot to offer people including council houses that are empty. It also has a doctors, Garda station and post office in walking distance.

Response of the Manager

1. There are no current proposals to develop any additional local authority housing in Bawn.
2. Noted.
3. It is expected that the majority of development taking place in Tier 6 settlements will be single dwellings. Section 3.4.5 states that development in Tier 6 settlements will be restricted to single dwellings. Where housing developments are proposed in Tier 6 settlements, the onus will be upon the developer to justify the demand for the housing proposed, the development shall be centred on the focal point of the settlement, and shall be subject to the satisfactory provision of infrastructure and services. All proposals for residential development within Tier 6 settlements will be subject to Policy CSP2 which requires, amongst other criteria, that it reflects the nature, scale and form of existing development within the settlement. **To provide clarity it is recommended that final**

paragraph of Section 3.4.5 be amended to state “To ensure new residential development is commensurate with anticipated housing demand in Tier 5 and Tier 6 settlements, only small scale housing developments will be permitted in those settlements now designated as Tier 5, and residential development in Tier 6 settlements will *generally* be restricted to single dwellings only.”

4. Noted.

5.36	Submission Ref:	DMCD36
	Person/Body:	Bawn Rural Protection Society 2012
	Location:	Bawn
	Core Issue:	Bawn as a Tier 6 Settlement

Points Raised

1. Bawn Rural Protection Society 2012 requests Monaghan County Council prevent further social housing at Bawn.
2. Bawn should not be included as a Tier 6 Settlement.

Response of the Manager

1. Noted. It is expected that the majority of development taking place in Tier 6 settlements will be single dwellings. Section 3.4.5 states that development in Tier 6 settlements will be restricted to single dwellings. Where housing developments are proposed in Tier 6 settlements, the onus will be upon the developer to justify the demand for the housing proposed, the development shall be centred on the focal point of the settlement, and shall be subject to the satisfactory provision of infrastructure and services. All proposals for residential development within Tier 6 settlements will be subject to Policy CSP2 which requires, amongst other criteria, that it reflects the nature, scale and form of existing development within the settlement. In addition, the provision of an acceptable standard of housing for all is a core aspiration of public policy. The Department of Environment, Community and Local Government's Housing Policy Statement, 2011, indicates that the overarching aim of national housing policy is now to enable all households to access good quality housing which is appropriate to household circumstances in their community of choice. Therefore where a demand for housing arises there is an onus for the local authority to seek to satisfy that demand. **To provide clarity it is recommended that final paragraph of Section 3.4.5 be amended to state "To ensure new residential development is commensurate with anticipated housing demand in Tier 5 and Tier 6 settlements, only small scale housing developments will be permitted in those settlements now designated as Tier 5, and residential development in Tier 6 settlements will *generally* be restricted to single dwellings only."**
2. Bawn has historically been a rural focal point at a crossroads, having a number of community facilities such as a church, a parochial hall, a handball alley, a public house and a post office in its vicinity. Bawn as a rural focal point would be considered to constitute a Dispersed Rural Community or Tier 6 settlement as set out in Chapter Three of the Monaghan County Development Plan 2013-2019. Therefore Bawn is considered to be a settlement.

5.37 Submission Ref: DMCDP37
Person/Body: Ellen Coyle
Location: Bawn
Core Issue: Bawn as a Tier 6 Settlement

Points Raised

1. Ms. Coyle would like Bawn to be removed from the Tier 6 settlement hierarchy to prevent further development.
2. The Bawn Housing Association does not represent the Bawn community and did not consult with the people of the Bawn area with regard to the project which was granted in 2005.
3. Additional housing schemes in the area will detract from the rural setting of Bawn and promote pollution of the area which is characterised by lakes, wildlife, woodlands and heritage.
4. Bawn cannot support further development in the area by virtue of its lack of shops, post office, community centre, school, leisure facilities, transport system, health system.

Response of the Manager

1. Bawn has historically been a rural focal point at a crossroads, having a number of community facilities such as a church, a parochial hall, a handball alley, a public house and a post office in its vicinity. Bawn as a rural focal point would be considered to constitute a Dispersed Rural Community or Tier 6 settlement as set out in Chapter Three of the Monaghan County Development Plan 2013-2019.
2. Noted.
3. It is expected that the majority of development taking place in Tier 6 settlements will be single dwellings. Section 3.4.5 of the development plan states that development in Tier 6 settlements will be restricted to single dwellings. Where housing developments are proposed in Tier 6 settlements, the onus will be upon the developer to justify the demand for the housing proposed, the development shall be centred on the focal point of the settlement, and shall be subject to the satisfactory provision of infrastructure and services. All proposals for residential development within Tier 6 settlements will be subject to Policy CSP2 which requires, amongst other criteria, development which reflects the nature, scale and form of existing development within the settlement. In addition, the consolidation of existing settlements is fundamental in achieving sustainable development, assists in encouraging the retention of local services and in attracting new additional local services, and offers an alternative to rural housing, particularly in areas which have sensitive ground and surface water, where a proliferation of on site effluent

treatment plants can be problematic in terms of water quality. **To provide clarity it is recommended that final paragraph of Section 3.4.5 be amended to state “To ensure new residential development is commensurate with anticipated housing demand in Tier 5 and Tier 6 settlements, only small scale housing developments will be permitted in those settlements now designated as Tier 5, and residential development in Tier 6 settlements will *generally* be restricted to single dwellings only.”**

4. Noted.

5.38 Submission Ref: DMCDP38
Person/Body: Angela & Brian McEntee
Location: Bawn
Core Issue: Bawn as a Tier 6 Settlement

Points Raised

1. The McEntee family is horrified at the proposal to include Bawn as a Tier 6 settlement. Bawn area is an area of natural beauty with a small community of eight social houses which is considered sufficient, anymore would be an eyesore.
2. Developers have caused devastation to quaint villages throughout the county. Shercock and Rockcorry have numerous empty town houses and apartments.
3. There is not the population to sustain or request more houses. Bawn has been hit by immigration and a lack of employment.
4. Vacant housing should be occupied as renting accommodation is a cheaper option than constructing new dwellings.
5. Social housing does not work in isolated rural areas as the cost of providing services is expensive.
6. There is a lack of infrastructure to facilitate additional dwellings.

Response of the Manager

1. It is expected that the majority of development taking place in Tier 6 settlements will be single dwellings. Section 3.4.5 of the development plan states that development in Tier 6 settlements will be restricted to single dwellings. Where housing developments are proposed in Tier 6 settlements, the onus will be upon the developer to justify the demand for the housing proposed, the development shall be centred on the focal point of the settlement, and shall be subject to the satisfactory provision of infrastructure and services. All proposals for residential development within Tier 6 settlements will be subject to Policy CSP2 which requires, amongst other criteria, development which reflects the nature, scale and form of existing development within the settlement. **To provide clarity it is recommended that final paragraph of Section 3.4.5 be amended to state “To ensure new residential development is commensurate with anticipated housing demand in Tier 5 and Tier 6 settlements, only small scale housing developments will be permitted in those settlements now designated as Tier 5, and residential development in Tier 6 settlements will *generally* be restricted to single dwellings only.”**
2. Noted.
3. Noted.

4. Monaghan County Council recognises that there are a number of vacant and unfinished residential developments in the county. Notwithstanding this, there is uncertainty as to whether or not these developments will be completed and/or when they will be available for occupation.
5. Noted.
6. Noted.

5.39 Submission Ref: DMCDP39
Person/Body: Fionnuala Byrne
Location: Bawn
Core Issue: Bawn as a Tier 6 Settlement

Points Raised

1. Ms. Byrne would like Bawn to be removed from the tier six settlement hierarchy.
2. Housing schemes in the area will detract from the rural setting of Bawn and promote pollution of the area which consists of lakes, wildlife, woodlands and heritage.
3. Bawn cannot support further development in the area by virtue of its lack of shops, post office, community centre, school, leisure facilities, transport system, health system.

Response of the Manager

1. Bawn has historically been a rural focal point at a crossroads, having a number of community facilities such as a church, a parochial hall, a handball alley, a public house and a post office in its vicinity. Bawn as a rural focal point would be considered to constitute a Dispersed Rural Community or Tier 6 settlement as set out in Chapter Three of the Monaghan County Development Plan 2013-2019. Therefore Bawn is considered to be a settlement.
2. It is expected that the majority of development taking place in Tier 6 settlements will be single dwellings. Section 3.4.5 of the development plan states that development in Tier 6 settlements will be restricted to single dwellings. Where housing developments are proposed in Tier 6 settlements, the onus will be upon the developer to justify the demand for the housing proposed, the development shall be centred on the focal point of the settlement, and shall be subject to the satisfactory provision of infrastructure and services. All proposals for residential development within Tier 6 settlements will be subject to Policy CSP2 which requires, amongst other criteria, development which reflects the nature, scale and form of existing development within the settlement. In addition, the consolidation of existing settlements is fundamental in achieving sustainable development, assists in encouraging the retention of local services and in attracting new additional local services, and offers an alternative to rural housing, particularly in areas which have sensitive ground and surface water, where a proliferation of on site effluent treatment plants can be problematic in terms of water quality. **To provide clarity it is recommended that final paragraph of Section 3.4.5 be amended to state “To ensure new residential development is commensurate with anticipated housing demand in Tier 5 and Tier 6 settlements, only small scale housing developments will be permitted in those settlements now designated as Tier 5, and residential**

development in Tier 6 settlements will *generally* be restricted to single dwellings only.”

3. Noted.

5.40 Submission Ref: DMCDP40
Person/Body: Thomas William Jordan
Location: Bawn
Core Issue: Bawn as a Tier 6 Settlement

Points Raised

1. Mr Jordan is concerned at Monaghan County Council's proposal to extend the eight existing houses in Bawn by a further 40 units.
2. Such a proposal would border the Lough Bawn Estate and surrounding area and would pose an environmental disaster.
3. There are no facilities for children who would therefore undoubtedly stray into the wooded area and start forest fires.
4. Such a proposal would be a threat to Derrygoony Lake and River. Mr Jordan has enclosed a newspaper article which states that Derrygoony Lake was polluted.
5. Mr Jordan is not against additional housing if they were built in Latton village given its existing infrastructure which includes a school, shop, post office, community centre, football pitch and church.

Response of the Manager

1. Monaghan County Council has no plans to develop 40 residential units within Bawn. It is expected that the majority of development taking place in Tier 6 settlements will be single dwellings. Section 3.4.5 states that development in Tier 6 settlements will be restricted to single dwellings. Where housing developments are proposed in Tier 6 settlements, the onus will be upon the developer to justify the demand for the housing proposed, the development shall be centered on the focal point of the settlement, and shall be subject to the satisfactory provision of infrastructure and services. All proposals for residential development within Tier 6 settlements will be subject to Policy CSP2 which requires, amongst other criteria, that it reflects the nature, scale and form of existing development within the settlement. **To provide clarity it is recommended that final paragraph of Section 3.4.5 be amended to state "To ensure new residential development is commensurate with anticipated housing demand in Tier 5 and Tier 6 settlements, only small scale housing developments will be permitted in those settlements now designated as Tier 5, and residential development in Tier 6 settlements will generally be restricted to single dwellings only."**
2. Noted.
3. This issue is outside the remit of the county development plan.

4. Any proposals for new development will not be permitted unless it is in compliance with the objectives and policies within the development plan, a number of which relate to the protection of water quality.
5. Noted.

4.41 Submission Ref: DMCDP41
Person/Body: Sean Brennan
Location: Annyalla
Core Issue: Landscape Protection

Points Raised

1. Monaghan is a very attractive county moulded by glaciers during the Ice Age.
2. The numerous lakes and wetlands within the county have been an attractive proposition for angling tourism from neighbouring European countries.
3. Planning control has protected the landscape from structures being built on the top of hills which would negatively impact upon the horizon.
4. There is concern regarding the decisions from An Bord Pleanala and the impact that has upon planning control in Monaghan.
5. It is important that the planning authority uphold the wishes of the public and maintain the drumlins in their original state rather than succumbing to the objectives of vested interests who have nothing to offer this county.
6. The elected representatives have a role in adopting a development plan that is robust and will protect the drumlins and lakes from visual impact caused by the construction of structures on hill and wetlands.
7. The policies within the development plan should be strengthened to protect the drumlin landscape and series of small lakes which are important part of our heritage.

Response of the Manager

1. Noted.
2. Noted.
3. Noted.
4. Noted.
5. Noted.
6. The draft development plan contains a number of objectives and policies which seek to protect the landscape, visual amenity and wetlands from inappropriate development.
7. The draft development plan contains a number of objectives and policies which seek to protect the landscape, visual amenity and wetlands from inappropriate development.

5.42 Submission Ref: DMCDP42
Person/Body: P J Brennan
Location: Annyalla
Core Issue: Landscape Protection

Points Raised

1. Lives in a lovely area of County Monaghan near Lemgare Rocks where there are views of the drumlin hills of Monaghan and Armagh.
2. Wishes to have this area designated as a site of National importance in the County Development Plan.
3. The area is close to the Monaghan Way which is a trek for tourists and backpackers who want to enjoy rural Monaghan.
4. The high ground of Lemgare Rocks should be protected from unsightly development as it is visible for miles within the counties of Monaghan and Armagh.
5. The area has historical significance dating from the penal times.
6. In recent years pressure has been exerted by commercial entities on landowners to consent to the erection of communications masts and electricity pylons. These type of developments should not be allowed to happen and thus it is extremely important that the area is designated as a national heritage area.

Response of the Manager

1. Noted.
2. Lemgare Rocks has been proposed for designation as National Heritage Area on the basis of geological/geo-morphological reasons.
3. Noted.
4. The draft development plan contains a number of objectives and policies for the protection of the landscape from inappropriate development.
5. Noted.
6. The draft development plan contains a number of objectives and policies which seek to protect the landscape, visual amenity and wetlands from inappropriate development.

5.43	Submission Ref:	DMCDP43
	Person/Body:	Louth County Council
	Location:	N/A
	Core Issue:	General

Points Raised

1. Last sentence of Section 3.2.2 should be amended to state that regional policy has set Monaghan Town population target figure.
2. The potential population of Monaghan Town in Table 3.11 of between 7,000 and 10,000 is in excess of the target of 9,300 set out in the Regional Planning Guidelines (RPGs) for 2022 and is further contradicted by the population projection of 7,542 by 2021 set out in Table 3.9 of the draft plan.
3. It is unclear why the Strategic Environmental Assessment (SEA) has a role in determining the quantum and location of zoned residential land as stated in Section 3.4.3, given that the amount of land required for residential development is provided for in the RPGs. The SEA has no role in determining the quantum of zoned residential land.
4. There is no rationale given for the minimum allocation of 1 hectare of residential land in Tier 4 settlements in Section 3.4.5 and it is unclear if these lands are serviced or not.
5. The Core Strategy set out includes 50% headroom but does not take account of vacant and unfinished housing. It is important that any additional lands zoned are absolutely necessary and sustainable.
6. There is no indication given of oversupply of zoned residential land in the county.
7. The indication in Section 3.4.8 that a variation to zone additional residential lands if a shortage of residential lands in any settlement was identified could result in overzoning of residential lands in the County. In these instances a review of the entire Core Strategy should be carried out to ensure that over zoning of residential lands does not occur.
8. Section 3.7.1 and Map 3.7 do not make reference to the fact that Ulsterbus operates a large proportion of the public transport services in County Monaghan.
9. Although the draft plan refers to the National Cycle Policy Framework 009-2020, it does not provide any detail on proposals for the promotion of cycling in the county, particularly given the level of abandoned railway trackbeds and canal towpaths in the county.
10. Section 6.4 and 8.4.6 should be linked as both relate to flood risk.
11. There is no direct policy to deal with flood risk areas.
12. The ecological corridors listed in the draft plan do not take account of those offered by the extensive network of relatively intact former railway lines in County Monaghan. It is accepted that these may be identified in the Green Infrastructure Strategy outlined in Objective GIO1 in Chapter Four.

13. Although the Environmental Report states that one of the environmental pressures in the county includes a threat to water quality from public waste water treatment plants (WWTPs) in some of the towns operating at full capacity, there appears to be adequate capacity at existing WWTPs. However, the data used in relation to existing WWTPs should be based on the figures in the 2012 update report on data presented in the EPA Report "Focus on Urban Waste Water Discharges in Ireland"
14. A table of Tier 5 settlements should be included in Section 14.3 and Tier 6 settlements should be also identified in this section.
15. The settlements indicated on the Core Strategy Map 3.2 and other similar maps in the draft plan should be colour coded and the spatial extent of each settlement mapped to allow identification of which category they fall within.
16. The non technical summary of the Environmental Report does not include an analysis of the alternatives dealt with in the main document.
17. The Planning and Development (SEA) (Amendment) Regulations 2011 include an addition in Article 13A(a)(v) "any adjoining planning authority whose area is contiguous to the area of a planning authority which prepared a draft plan, proposed variation, or local area plan"
18. The National Biodiversity Plan has been updated.
19. The alternative scenario of 'growth with relaxed policies' is questionable as a realistic alternative given the provisions of Section 28 of the Planning and Development Acts 2000-2010 in respect of Ministerial Guidelines.
20. The Areas of Primary Amenity, Secondary Amenity and Visual Amenity mentioned in Section 6 should be mapped and or illustrated and connected to maps.
21. It would be of benefit that those objectives and policies identified has having the potential to conflict with the strategic environmental objectives were identified in Section 12 and 13 for mitigation.
22. The statement in Section 14 "there may be certain elements of them that could also lead to a potential for environmental conflict. Where this arises the policies and objectives should be mitigated to an acceptable level" further enhances the requirement for appropriate mitigation measures to be included.
23. Policies that state shall be considered under Policies AAP1 – AAP4 should be amended to Policies AAP1 – AAP5.

Response of the Manager

1. Noted. National to be replaced with regional.
2. There is no contradiction. The population targets set out in the Regional Planning Guidelines are not designed to be upper limits, but are targets to be achieved. The

population figure set out in Table 3.11 is a potential population range. To fulfil its status as a Hub Town in the National Spatial Strategy, it will be necessary to ensure the population of Monaghan grows to achieve critical mass. Given that the population size of Monaghan Town is quite low compared to other Hub Towns, it is essential that the population of the town is encouraged to grow. Being confined to an upper limit of 9,300 could prevent this critical mass being obtained. Table 3.9 sets out population predictions for the four largest towns in County Monaghan. This table indicates the change in population where no objectives or policies are employed to consolidate, re-enforce and grow the main settlements in the county. One of the objectives of the National Spatial Strategy and the Regional Planning Guidelines for the Border Region is to strengthen and growth settlements to ensure they have critical mass and can sustain and add to the services and facilities within them. This table illustrates the likely occurrence in the absence of these policies.

3. The SEA informs the development plan in respect of those locations that can support increases in population based on environmental and infrastructural capacity. Consequently the amount of land zoned for development in a settlement in an area of sensitive ground or surface waters is likely to be limited based on the information derived from the SEA.
4. This statement is incorrect. Section 3.4.5 states that that the minimum of 1 hectare has been set due to the low level of zoned residential land required and the concern that this would hinder the development of an appropriate range and quantum of house types. This would counteract the development of a single house with large curtilage consuming all or a significant portion of the residential land in these villages.
5. It is explained in Section 3.4.5 that there is uncertainty as to whether or not and when vacant and unfinished housing will be available for occupation given the current economic situation. It would be inappropriate to limit the quantum of zoned land to 100% of the requirement given this uncertainty and potential unknown difficulties in developing all of the residential lands required.
6. A significant oversupply of zoned residential land was provided for in the Monaghan County Development Plan 2007-2013. However, it is considered that quantifying this level of oversupply of zoned residential land should have no bearing on the residential zoning under the draft plan. The key determinant in zoning residential land in the draft plan was based on the principles set out in the Core Strategy in Chapter Three.
7. Paragraph five of Section 3.4.8 clearly states that where a need for additional zoned residential land is identified in a particular settlement, a review of the amount and uptake of all zoned residential lands will be carried out. To ensure that the threshold of proposed residential zoning set out in Table 3.13 is not exceeded, lands that are deemed not

suitable or capable of development for residential use shall no longer be acceptable for residential use.

8. Although Ulsterbus does provide some transport service in County Monaghan it is limited, and there is obligation for this company to provide service in County Monaghan.
9. This statement is incorrect. In addition to objectives promoting cycling as an alternative mode of transport in Chapter Six, Section 7.5 contains a significant number of objectives and policies to promote cycling including the development of a cycling strategy for the county, the identification of safe cycle routes in urban areas and between the main towns and villages, and appropriate directional signage, during the lifetime of the plan. It is reasonable to assume that old railway lines and parts of the Ulster Canal towpath will be included in these measures.
10. Section 6.4 sets out the general approach, objectives and policies in respect of development in areas with flood risk potential. Section 8.4.6 deals specifically with cases where development in urban areas may be acceptable where there is a risk of flooding. As this would only apply in exceptional circumstances in urban areas, it is appropriate that this section is contained within the chapter addressing strategic objectives for settlements.
11. **It is recommended that Policy FLP 3 be inserted in Section 6.4 stating *“Development in areas at risk of flooding or that have the potential to cause/exacerbate flooding elsewhere, will only be permitted where it has been demonstrated to the satisfaction of the planning authority that the development is in accordance with the principles set out in Section 8.4.6 of the Monaghan County Development Plan 2013-2019 and the provisions set out in the Department of Environment, Heritage and Local Government Guidelines The Planning System and Flood Risk Management (2009). In all cases the onus will be on the developer to provide justification for the development in accordance with the provisions of these guidelines”***
12. The Green Infrastructure Strategy outlined in Objective GIO1 in Chapter Four will take account of the ecological corridors offered by the extensive network of relatively intact former railway lines in County Monaghan.
13. The information presented in respect of the capacity of existing WWTPs was accurate in early 2012. However, these figures will be reviewed to ascertain if any updates are necessary.
14. **The Tier 5 settlements have been listed in Table 3.11 of the Core Strategy. However, for ease of reference, it is recommended that the Tier 5 settlements be listed in tabular form in Section 14.3.** Given the characteristics of Tier 6 settlements, which are essentially rural focal points, it would not be appropriate to establish a defined list.

15. In order to minimise confusion it is recommended that only those settlements which fall within Tiers 1 to 5 be identified on the Core Strategy Map 3.2 and other similar maps.
16. The non technical summary of the Environmental Report shall be revised to include an analysis of the alternatives dealt with in the main document.
17. Noted.
18. It is recommended that Table 2 shall be amended to include reference to the **National Biodiversity Plan 2010-2015.**
19. It is considered that this scenario is a realistic alternative.
20. The Areas of Primary Amenity, Secondary Amenity and Visual Amenity are illustrated in Map 4.7 of the draft development plan.
21. Those objectives and policies identified as having the potential to conflict with the strategic environmental objectives are identified in table 31 and each objective or policy is identified along with the mitigation measures Section 13.
22. Mitigation measures have been introduced into the draft plan as a result of the Strategic Environmental Assessment and it is considered that these measures have resulted in objectives and policies that once may have conflicted with the strategic environmental objectives are now benign or have significantly reduced potential.
23. It is recommended that this typing error be amended where it occurs.

5.44 Submission Ref: DMCDP44
Person/Body: Harry Weir
Location: Bawn
Core Issue: Bawn as a Tier 6 Settlement

Points Raised

1. Mr Weir is objecting to the proposal to create an entirely new tier 5 village on 40 acres at Bawn Cross.
2. There are 16 houses within Bawn at present and Mr Weir strongly objects to any further development or houses on this site.
3. The 16 social houses were constructed amidst protest from the local community and were a reduction from the 40 dwellings Monaghan County Council had proposed.
4. There are limited amenities in the area.
5. The existing houses were built above marsh land which could create a potential possibility of pollution.
6. The development is located within a green belt and there are no developments which are similar in size within 8km.
7. There has been little or no attempt to disguise the existing dwellings with trees.
8. The existing dwellings are located on the edge of a large private estate which could be potentially vandalised or dangerous to children.
9. Objects to the use of the local lake to take the overflow and processed water from its sewerage treatments. The existing development already puts huge pressure on the drinking water as well as the general environment.
10. Noise pollution from barking dogs carries across the lake.
11. Unsure as to why the houses within the existing estate have to be constructed so close together. History points to the fact that antisocial behaviour can be a result of such development.
12. There has been an upsurge in vandalism and theft in the area.
13. Confused in regards to any future builds given the financial situation at the moment and the number of housing estates which are unfinished and are vacant.
14. Confused as to why the County Council can afford to build houses when it cannot afford to repair local roads, support local health care or retirement homes.
15. Objects to Monaghan County Council holding permission to extend this site.
16. Objects to Monaghan County Council building any future council houses being built in Bawn or the local area.
17. Object to Monaghan County Council turning the townland of Bawn into a village.

Response of the Manager

1. This statement is incorrect. Bawn has historically been a rural focal point at a crossroads, having a number of community facilities such as a church, a parochial hall, a handball alley, a public house and a post office in its vicinity. Bawn as a rural focal point would be considered to constitute a Dispersed Rural Community or Tier 6 settlement as set out in Chapter Three of the Monaghan County Development Plan 2013-2019.
2. This statement is incorrect. Currently eight dwellings have been constructed by Monaghan County Council in Bawn.
3. Noted. However Monaghan County Council had no proposals to construct 40 dwellings in Bawn.
4. Noted.
5. There is no evidence of any pollution emanating from the existing housing.
6. Noted. However the development is not located within a green belt.
7. It was considered that the proposed development would not have any significant visual impact at this location.
8. This issue does not fall within the remit of the development plan.
9. The existing sewerage treatment facility has the capacity to effectively treat the current effluent loading.
10. This issue does not fall within the remit of the development plan.
11. This issue does not fall within the remit of the development plan.
12. This issue does not fall within the remit of the development plan.
13. Monaghan County Council recognises that there are a number of vacant and unfinished residential developments in the county. Notwithstanding this, there is uncertainty as to whether or not these developments will be completed and/or when they will be available for occupation.
14. Monaghan County Council does not currently have any proposals to build additional residential units in Bawn.
15. Monaghan County Council currently has no proposal to extend development on this site.
16. Monaghan County Council currently has no proposal to extend development on this site.
17. Bawn has historically been a rural focal point at a crossroads, having a number of community facilities such as a church, a parochial hall, a handball alley, a public house and a post office in its vicinity. Bawn as a rural focal point would be considered to constitute a Dispersed Rural Community or Tier 6 settlement as set out in Chapter Three of the Monaghan County Development Plan 2013-2019. Therefore Bawn is considered to be a settlement. It is expected that the majority of development taking place in Tier 6 settlements will be single dwellings. Section 3.4.5 of the development plan states that development in Tier 6 settlements will be restricted to single dwellings. Where housing

developments are proposed in Tier 6 settlements, the onus will be upon the developer to justify the demand for the housing proposed, the development shall be centred on the focal point of the settlement, and shall be subject to the satisfactory provision of infrastructure and services. All proposals for residential development within Tier 6 settlements will be subject to Policy CSP2 which requires, amongst other criteria, development which reflects the nature, scale and form of existing development within the settlement. **To provide clarity it is recommended that final paragraph of Section 3.4.5 be amended to state “To ensure new residential development is commensurate with anticipated housing demand in Tier 5 and Tier 6 settlements, only small scale housing developments will be permitted in those settlements now designated as Tier 5, and residential development in Tier 6 settlements will *generally* be restricted to single dwellings only.”**

5.45	Submission Ref:	DMCDP45
	Person/Body:	Mr. Robert O'Byrne
	Location:	Bawn
	Core Issue:	Bawn as a Tier 6 Settlement

Points Raised

1. Mr. O'Byrne is concerned that Bawn has been designated as a Tier 6 settlement without limitation to development.
2. The designation is unwise and given the nature of the Bawn habitat contrary to the guidelines proposed with regard to environment and heritage.
3. Bawn should be removed from the proposed Tier 6 settlement classification and the Bawn area should be guaranteed special protection from any hazardous future development.

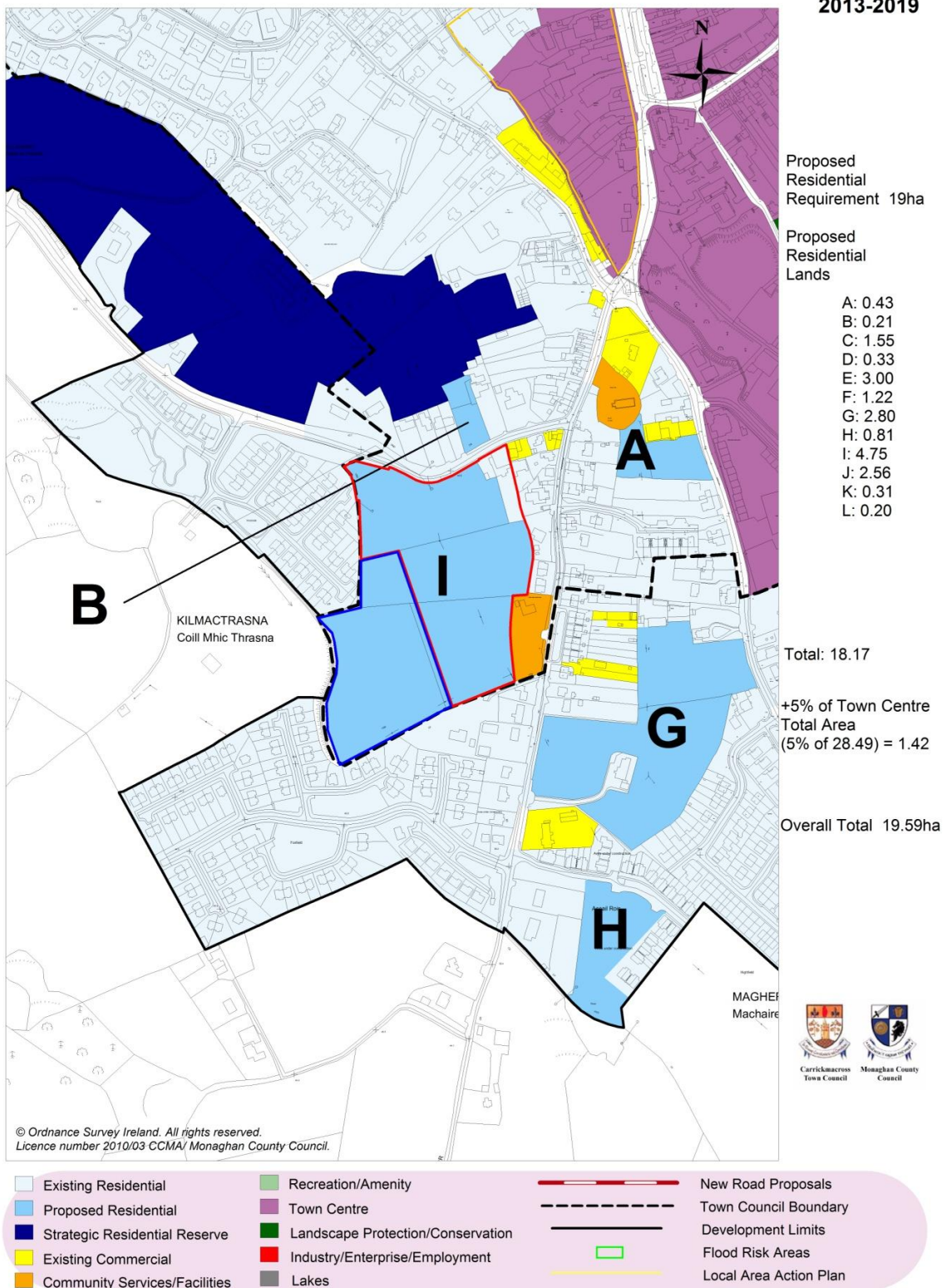
Response of the Manager

1. It is incorrect to suggest that residential development will take place within Tier 6 settlements without limitation. It is expected that the majority of development taking place in Tier 6 settlements will be single dwellings. Section 3.4.5 states that development in Tier 6 settlements will be restricted to single dwellings. Where housing developments are proposed in Tier 6 settlements, the onus will be upon the developer to justify the demand for the housing proposed, the development shall be centred on the focal point of the settlement, and shall be subject to the satisfactory provision of infrastructure and services. All proposals for residential development within Tier 6 settlements will be subject to Policy CSP2 which requires, amongst other criteria, that it reflects the nature, scale and form of existing development within the settlement.
2. The draft County development plan contains a significant number of objectives and policies for the protection of water quality, habitats, biodiversity and landscape.
3. Bawn has historically been a rural focal point at a crossroads, having a number of community facilities such as a church, a parochial hall, a handball alley, a public house and a post office in its vicinity. Bawn as a rural focal point would be considered to constitute a Dispersed Rural Community or Tier 6 settlement as set out in Chapter Three of the Monaghan County Development Plan 2013-2019. Therefore Bawn is considered to be a settlement. All proposals for residential development within Tier 6 settlements will be subject to Policy CSP2 which requires, amongst other criteria, that it reflects the nature, scale and form of existing development within the settlement.

5.46 Submission Ref: DMCDP46
 Person/Body: Irene Connolly
 Location: Carrickmacross – Refer to Maps DMCDP46a & DMCDP46b
 Core Issue: Zoning of Lands

Carrickmacross Town (Map DMCDP46a)

Draft Monaghan County
 Development Plan
 2013-2019



**Draft Monaghan County
Development Plan
2013-2019**



Points Raised

1. It is proposed that 2 hectares of the lands marked “I” be de-zoned (refer to portion of lands outlined in red on Map DMCDP46a) and the displaced proposed Residential zoning be allocated to lands on the Dundalk Road
2. Policy FL3 in the current development plan states that development should not exacerbate flooding outside the site and policy FL5 of the current development plan states that there should be an integrated approach to the management of flood risk.
3. The lands of the subject site slope down to a river which takes water from surrounding housing estates. The addition of hard surfaces will further increase the issue of flooding of this river.
4. The river is partially piped in the Foxfield estate and a blockage would cause the partial flooding of the subject lands.
5. The ground conditions along the bottom of the subject lands are not conducive to building. The road and rear gardens of adjacent properties have moved as a result of unstable ground.
6. The dispersion of residential development is concentrated in this area and the additional zoning of the subject lands would lead to an unbalanced distribution in this part of the town.
7. It is proposed that the lower part of the lands be de-zoned. (outlined in blue on Map DMCDP46a)
8. It is proposed that the lands on the Dundalk Road proposed as Strategic Residential Reserve be designated partly for Proposed Residential and partly for Industry, Enterprise and Employment. (outlined on Map DMCDP46b)

Response of the Manager

1. The lands labeled ‘I’ are located within the functional area of Carrickmacross Town Council and the lands located on the Dundalk are within Monaghan County Council functional area.
2. Noted.
3. The draft county development plan contains objectives and policies such as Policy FLP2 in respect of the use of Sustainable Urban Drainage Systems in new developments to limit storm run off from developments.
4. Noted. Evidence provided by the Office of Public Works would suggest that an issue with the flow of water in the area could cause flooding in a small area of the southern extremity of the subject site.
5. Noted.

6. Lands suitable for residential use, both Proposed Residential and Strategic Residential Reserve, have been designated at locations throughout the town. However, there is a higher concentration of lands zoned as Proposed Residential in this part of the town due to the number of undeveloped lands in this area, its proximity to the town centre, and the requirement of the Core Strategy for sequential development of the town.
7. With the exception of a small portion of the southern extremity of the site, it is considered appropriate that the subject lands are zoned as Proposed Residential given their location amongst existing residential developments, their proximity to the town centre, and the fact that they are part of a larger parcel of land that would deliver a significant number of dwellings.
8. The subject lands on the Dundalk Road are zoned in the draft development plan as Strategic Residential Reserve, are located amongst existing residential development removed from any other industrial development, and in a location that is surrounded by areas of amenity such as Lough Naglack and Lisanisk Lake. Given these factors and the steep topography of both sites, it is considered that the zoning of these lands for Industry, Enterprise and Employment use would not be appropriate. **Submission DMCDP74 has requested a portion of land in this area be zoned for recreation and amenity use for the benefit of the adjoining housing developments. If the elected members agree to accommodate this request on the lands labeled 'I', it is recommended that 0.93 hectare of the southwestern portion of these lands (Refer to Map DMCDP74 in Section 5.74 of this report) be zoned as Recreation and Amenity. It is also recommended that the 0.93 hectare sized plot of land referred to on the Dundalk Road, to the north west of the roundabout, be zoned as Proposed Residential thereby maintaining the same quantum of Proposed Residential zoning in the town.**

5.47	Submission Ref:	DMCDP47
	Person/Body:	Keep Ireland Open
	Location:	N/A
	Core Issue:	Access to the Countryside

Points Raised

1. Keep Ireland Open (KIO) is a voluntary national body with members in County Monaghan which lobbies for legal right to reasonable access to the countryside.
2. The submission relates to access to the countryside and directly related issues.
3. Consideration should be given to development plans in other counties, particularly within the Border Region, as well as adjoining counties.
4. It is assumed that the adopted development plan will include an index.
5. The development management guidelines and standards should be dealt with at the end of the each chapter, or at least cross referenced with other chapters.
6. Paragraphs and lists of points should be numbered.
7. Section 1.5.2 should include the statement “*This Plan has been drawn up to be consistent with the National Spatial Strategy as far as possible.*”
8. The draft plan does not combine Recreation and Tourism as required by the Development Management Guidelines issued by the Department of Environment, Heritage and Local Government.
9. The words “have regard to” in Section 1.8.3 should be replaced with “take account of”.
10. Other development plans should be specifically mentioned in Section 1.8.3.
11. The draft plan does not have appear to have taken sufficient account of some of the provisions of other development plans.
12. An additional objective/policy to review the Heritage Plan should be included in the draft plan.
13. An additional objective/policy relating to employment of the Heritage Officer should be included in the draft plan.
14. Section 4.3 should include an objective relating to encouraging, promoting, facilitating and protecting public rights of way to geological heritage sites.
15. The names of the principal rivers, lakes and mountains should be mentioned in Section 4.4.
16. Policies SAO1 and SAO2 should be included as general objectives for all areas of amenity.
17. An additional policy to protect skylines and ridgelines from development should be included in Section 4.5.3.

18. An additional sub section entitled Special Amenity Area Orders and an Objective to propose the designation of special amenity areas should be included in the draft plan, with a report prepared on areas worthy of designation to be carried out within one year of the adoption of the plan.
19. An additional sub section should be included in Section 4.6 relating to the provision, preservation, promotion, improvement, and facilitation of public access to inland waterways to create linear parks.
20. An objective should be included designating minimum widths of riparian corridors.
21. An objective to maintain, protect, properly manage and expand waterway corridors and keep adjoining land free from inappropriate development 10-15 metres from watercourse banks.
22. Development along watercourses should be set aside land for walking/cycling routes to form a network of routes linking other such areas.
23. A policy should be included to take into account proposals to increase and enhance public access within development proposals.
24. Existing or potential riverside walks/cycle routes should be mentioned in the draft plan.
25. The promotion, enhancement and usage of canal towpaths as walking and cycling routes, keeping them free from inappropriate development and the promotion of links with other routes should be included.
26. Lakeside and riverside amenity areas should be listed.
27. A sub section on access to amenities recognising the role of natural amenities as a major resource for visitors and locals should be included.
28. A sub section requiring a feasibility study on the inclusion of areas suitable to be designated National Parks to be carried out within one year should be included.
29. Section 4.9.8 should be renamed *Amenity Lakes and Rivers*
30. All of the principal archaeological sites in the county should be listed.
31. An additional sub section should be included to provide, promote, enhance and protect public access to archaeological sites and National Monuments with appropriate signage.
32. An additional sub section should be included relating to the unsightliness of fencing off of open land in upland areas and its impact upon access to these lands. An additional objective/policy should be included to not normally permit fencing in upland areas unless essential to the viability of the farm, it is of a type which is visually acceptable, it permits access to upland, and is for a maximum period of ten years.
33. An additional objective/policy should be included to encourage and facilitate access to all forestry and woodlands taking into account the Forest Service 2006 publication "Forest Recreation Guide for Owners and Managers".

34. An objective/policy should be included stating that forestry should not obstruct existing rights of way, walking routes and recreational and tourism facilities.
35. An objective/policy should be included stating that access routes to upland walks should be protected.
36. An objective/policy should be included stating that existing rights of way and established walking routes be identified before planting commences.
37. An objective/policy should be included stating that forestry will not be permitted on ridge lines and that felling of forestry has regard to scenic landscape, public rights of way, access routes and heritage features.
38. An objective/policy should be included stating that planting above 300 metres above sea level should be discouraged.
39. A list of recreational forests should be included.
40. The development plan should incorporate an indicative forestry strategy, prepared and implemented in co-operation with the Forest Service which provides for the maintenance of public rights of way and walking routes.
41. An objective/policy should be included discouraging new coniferous forestry in proposed and adopted National Heritage Areas, Special Areas of Conservation, Special Protection Areas, sensitive rural landscapes, visually vulnerable areas, and along scenic routes.
42. An objective/policy should be included to promote the NeighbourWood Scheme in County Monaghan.
43. There should be a combined Recreation and Tourism as required by the Development Management Guidelines issued by the Department of Environment, Heritage and Local Government.
44. The activities mentioned in the second paragraph of Section 5.11.2 should be sub divided into three categories of non noise generating, noise generating and cultural and other attractions. The noise generating activities should be omitted due to the safety problems and inconvenience caused by them.
45. Additional activities such as bird watching, painting, photography, field studies, back packing, orienteering, para/hang gliding, caving, hill walking, mountaineering, rock climbing, adventure sports, swimming in waterways, wild camping, boating, archaeological guided walks should be included in Section 5.11.2.
46. The names of mountains, main hills, river valleys, lakes, canals, archaeological sites, geology areas, woodlands open to the public, off road walking and cycling routes and National Monuments should be listed in the fourth paragraph of Section 5.11.2.
47. An objective supporting and promoting the objectives set out in the National Cycle Policy Framework 2009-2020.

48. Additional text should be inserted in Section 7.4.2 that states that landowners should be kept informed of the procedures involved in identifying public rights of way, that they could reasonably refuse access to other lands outside the public rights of way, that once walking routes are built upon they are lost, and that there is no guarantee that permission will be forthcoming on new or traditional walks which are permission footpaths.
49. A separate sub section should be included for public rights of way containing Objectives RAO10 and RAO11.
50. Objective RAO10 should be replaced by “Maintain, protect, preserve, conserve, promote, encourage, enhance, support, improve and extend for the common good, a network of public rights of way to traditional outdoor amenities including heritage sites and features of archaeological interest, National Monuments, mountains, hills, rivers, forests, lakes, geological and geomorphic systems, water corridors, and other natural amenities by legal action if necessary”.
51. Objective RAO11 should be replaced by “Preserve public rights of way which give access to seashore, mountain, lakeshore, river bank, or other place of natural beauty or recreational utility, which public rights of way shall be identified on at least one of the maps forming part of the development plan and by indicating their location on a list appended to the development plan.”
52. The Planning and Development Act 2010 does not allow the deferment of the identification and listing of public rights of way for the lifetime of the development plan or where resources are available.
53. An objective should be included to identify public rights of way on an annual basis and include them within the development by way of variation annually.
54. An objective to examine paths and access points to rivers, mountains, etc. to determine where existing rights of way and where new rights of way can be created to ensure access.
55. An objective should be included to prevent development being permitted which would adversely affect a public right of way unless the right of way is diverted by a minimal distance, the route continues to be segregated from vehicular traffic, and legal matters in respect of the substitution of the route have been undertaken.
56. An objective to provide adequate signposting of public rights of way should be included.
57. An objective to protect existing rights of way from unauthorized development and take enforcement action should be included.
58. A policy to look favourably upon planning applications which include proposals to improve the condition and appearance of existing rights of way.
59. A policy to ensure existing rights of way are identified before prior to any new planting, new infrastructure, or new developments should be included.

60. An objective to protect and promote greenways and consider designating them as public rights of way should be included.
61. The second paragraph of Section 7.5 should include the following statement “Walking and cycling represent an important way to discover and enjoy the pleasures of rural areas.”
62. The contents of the third paragraph of Section 7.5 should be incorporated into an expanded Objective CWO6.
63. Objective CWO3 should be replaced with “Develop an overall walking and cycling policy within two years of the adoption of the plan in partnership with state, private and voluntary sector, walking clubs and community groups.”
64. Objective CWO4 should be split into two objectives.
65. Objective CWO5 should be replaced by “Preserve, support and protect all walking routes by prohibiting the intrusion of development along public walking routes, particularly those in scenic areas and along inland waterways and take appropriate action to prevent attempts to close them off and take into account the impact of proposed development when considering applications for permission for developments in their vicinity.”
66. Objective CWO6 should be replaced by “Acknowledging that tourism is suffering from a lack of safe and traffic free cycle routes, promote the expansion of cycle facilities and liaise with Failte Ireland, the Sports Council, the National Transportation Authority and other bodies in the development of cycling touring routes particularly in areas of high amenity and implement the relevant policies of the Department of Transport’s National Cycle Policy Framework and support the provision of a National Cycle Network to improve these routes with better sign posting and road surfaces, cycling maps, promotion of looped routes to cater for visitors and local people.
67. An additional objective should be included to support and promote the Irish Trails Strategy in conjunction with the Irish Sports Council (National Waymarked Ways Committee) or other national programmes, and seek to protect long distance walking routes and local Waymarked Ways in partnership and local/regional tourism interests and the Dept of Transport & Tourism.
68. An additional objective should be included to support, promote, upgrade and encourage awareness campaigns promoting walking and cycling as simple, inexpensive ways to increase participation levels in physical activity across all ages and to facilitate healthy life styles and support, improve and expand Slí na Sláinte routes in consultation with community groups, the Irish Heart Foundation local/regional tourism interests and Dept of Transport & Tourism.
69. An additional objective should be included to provide, improve and extend the network of cycle lanes and pedestrian routes on existing roads and on all new regional, local distributor and local collector roads, and roads being up-graded to provide facilities,

particularly in tourist areas to maintain segregated, safe, convenient and pleasant routes for pedestrians and cyclists in accordance with the best international standards. Continually upgrade the condition of footpaths, by providing controlled and uncontrolled crossings where warranted at all major crossing points. Advise other road users on the need for safe behaviour near pedestrians and cyclists.

70. An additional objective should be included to signpost/waymark walking/cycle routes.
71. An additional objective should be included to create, promote, sustain, encourage, facilitate, enhance and support the creation of a network of cycling/walking routes(including looped walks and waymarked ways), off-road cycle trails and public/ rural footpaths, along cutaway bogs, established rights of way, green corridors and other off-road routes, and enhance and extend existing routes, in conjunction with the Irish Sports Council, Failte Ireland, the NTA and landowners (either formally, informally or by acquisition) to comply with the Government's Smarter Travel Policy.
72. An additional objective should be included to support cycling, walking groups and local communities in the development of routes including Sli na Slainte routes and improvement of access for mountaineering and hill walking for the benefit of locals and visitors.
73. An additional objective should be included to establish a register of all walking and cycling routes in partnership with state, private and voluntary sectors and add additional walking routes within the lifetime of the plan and investigate their legal status.
74. Consideration should be given to establishing walkways/cycleways on disused roads, railways, tow-paths of disused canals and bridle paths
75. The National Trails Network, Sli na Slainte should be listed in the Development Plan with accompanying maps.
76. Car parking should be provided for cyclists, hillwalkers and mountain climbers at appropriate points to access amenities.
77. The existing network of traditional paths used for leisure purposes (including pilgrim and mass tracks) should be mapped with the intention of determining the legal basis and status of their use.
78. An additional objective should be included to encourage and promote the provision of guided walks in partnership with state, private and voluntary sectors
79. Consideration should be given to the imposition of a development levy, in addition to other funding sources, for the development of walking and cycling trails, including inter-county cycle routes.
80. An additional objective should be included to prepare and implement on a progressive basis the development of bridle paths.

81. The introduction of a Walking Festival should be considered, to attract visitors and celebrate the diverse landscape and heritage.
82. An additional objective should be included to ensure that existing walking routes are maintained.
83. Walking and cycling trails, Ways & pilgrim paths should be named in the development plan.
84. An additional objective should be included to protect and promote Greenways and linear parks to facilitate the spread of rural landscape into urban areas.
85. An additional objective should be included to support the efforts of Comhairle na Tuaithe to improve access to the countryside through the National Countryside Recreation Strategy.
86. An additional objective should be included to develop a strategy to promote and facilitate greater use of travel such as walking and cycling, in the line the Dept of Transport's "Smarter Travel, Cycle and Walking Strategy".
87. An additional objective should be included to support, promote and encourage the development of walking routes and cycling routes, in conjunction with the Irish Sports Council and Failte Ireland.
88. An additional objective should be included to examine roads to establish their potential for segregated cycleways, particularly in tourist areas.
89. An additional objective should be included to assign an officer at appropriate senior level as a "Cycling Officer".
90. The Natural and Built Heritage section in Chapter Eight should be incorporated in the appropriate sub sections in Chapter Four as many of the provisions clearly relate to areas outside settlements.
91. The Recreation and Amenity section should be incorporated in Section 7.4 as many of the provisions clearly relate to areas outside settlements.
92. The Tourism section should be incorporated in Sec 5.11 as many of the provisions clearly relate to areas outside settlements.
93. Objective STO 4 should be replaced by "Promote and encourage, in partnership with Waterways Ireland, the re-opening of the Ulster Canal(including the towpath)."
94. Policy AFP 5 should be transferred to Section 5.11.2 or Section 5.5.4.
95. In the interest of consistency, the protection of public rights of way from inappropriate development provided for in the policies on Extractive Industry should be provided for in the renewable energy policies.
96. The development plan should include a policy on stating "Developments should not interfere with rights of way and access tracks."

97. In the interest of consistency, protection of public rights of way from inappropriate development provided for in the policies on Extractive Industry should be provided for in the policies on Hydro Energy.
98. An additional policy should be included requiring mast and base stations to avoid hill tops except in exceptional circumstances, locations in the direct line of listed views or prospects and major tourist routes.
99. Policy EIO7 should be replaced with “Ensure that extraction and associated processes do not impinge on existing rights of way or walking routes.
100. An additional policy should be included to facilitate development providing that the environment and the landscape are safeguarded to the greatest possible extent...and that development does not adversely affect tourism amenity.
101. An additional policy should be included requiring the over riding priority to be that the benefits of the development outweigh any adverse environmental consequences.
102. An additional policy should be included to identify existing rights of way and walking routes prior to any new golf course development and ensure that proposals for golf courses must not impinge on any right of way or walking route.
103. An additional policy should be included to ensure that the integrity of the Planning System is maintained and that it operates for the benefit of the whole community, that the environment is not jeopardised by inappropriate and environmentally damaging development and ensure that the policies and objectives of the Plan are implemented and adhered to.
104. An additional policy should be included to require the use of all powers conferred by law to ensure that development only takes place with the benefit of a valid planning permission and that all conditions attached thereto are complied with in the development.
105. The enforcement provisions contained in the Planning & Development Act 2000 incorporate the ‘polluter pays’ principle. If a person has carried out unauthorised development, they will have to pay the Planning Authority’s costs in investigating and for enforcing the breach.

Response of the Manager

1. Noted.
2. Noted.
3. Noted.
4. **It is recommended that the adopted development plan includes an index specifying elements of the development plan.**
5. The development management guidelines will be cross referenced with other chapters.
6. It is considered that the numbering format of the draft plan is adequate.

7. Section 1.5.2 will include the statement “*This Plan has been drawn up to be consistent with the National Spatial Strategy as far as possible.*”
8. It is considered that the inclusion of recreation within the Community Infrastructure chapter of the draft plan is not appropriate.
9. It is considered that the words “have regard to” are consistent with the Planning and Development Act.
10. It is not considered necessary to specifically mention other development plans.
11. The provisions of other development plans have been considered in the preparation of the draft development plan.
12. It is considered that the preparation of the Heritage Plan is outside the remit of the development plan.
13. The employment of the Heritage Plan is outside the remit of the development plan.
14. **It is recommended that Objective RAO9 be amended to read as “Promote and provide, where possible access to *geological heritage sites, archaeological heritage sites, forestry, woodlands, mountains, rivers, ~~and~~ lakes, canals, and other waterways* for recreational and amenity uses and facilitate where appropriate, the development of ancillary facilities which would not detract from the setting of the recreational or amenity value of *these areas.*”**
15. Section 4.4 is an introduction to the Landscape section of this chapter and therefore it is not appropriate to provide details of the names of the principle rivers, lakes and mountains in this section.
16. **It is recommended that Objectives SAO1 and SAO2 be stated as general objectives for all areas of amenity in Section 4.5 and be renumbered as AAO1 and AAO2.**
17. It is considered that Objective LPP3 and Policies RDP3 and RDP4 are sufficient to address this issue.
18. It is considered that the objectives and policies within the draft plan are sufficient to provide protection to areas of amenity. However, the provisions set out under Section 202 of the Planning and Development Act 2000 is available to the planning authority if necessary.
19. **It is considered that Objective RAO9 addresses this issue without a separate sub section in Section 4.6. However, it is recommended that this objective be amended to read as “Promote and provide, where possible access to *geological heritage sites, archaeological heritage sites, forestry, woodlands, mountains, rivers, ~~and~~ lakes, canals, and other waterways* for recreational and amenity uses and facilitate where appropriate, the development of ancillary facilities which would not detract from the setting of the recreational or amenity value of *these areas.*”**

20. It is considered that the designation of a minimum width of riparian corridor for all waterways would be a crude instrument to protect riparian corridors. Objective WPO4 enables the designation of riparian zone protection areas. The provisions of this objective would enable specific riparian zones/corridor widths.
21. It is considered that Objective WPO4 is sufficient to address this issue.
- 22. As point 14 above.**
23. It is considered that the inclusion of such a policy is not appropriate.
24. It is considered that the inclusion of such a policy is not necessary.
- 25. As point 14 above.**
26. It is considered that a list of all lakeside and riverside amenity areas would not be practicable.
27. It is considered that the inclusion of such a section is not appropriate.
28. It is considered that this is a matter for the Department of Arts, Heritage, and the Gaeltacht.
- 29. It is recommended that Section 4.9.8 should be renamed Amenity Lakes and Rivers”**
30. The Record of Monuments and Places is included within Appendix Six.
- 31. As point 14 above.**
32. The draft plan includes Policy PAP2 in Chapter Four which removes exempt development provisions in Areas of Primary Amenity Value in accordance with Article 9(1)(a)(vi) of the Planning and Development Regulations. It is not considered necessary to include a specific policy restricting the fencing of upland areas given the provisions of 9(1)(a)(x) of the Planning and Development Regulations.
- 33. As point 14 above.**
34. It is considered that this issue is addressed sufficiently by Objective RAO10.
35. As point 34 above.
36. As point 34 above.
- 37. It is recommended that Objective FYO3 be amended to state “Protect natural waters, wildlife habitats, conservation areas, heritage areas, *prominent landscape features*, archaeological sites and artefacts within forest sites and nature designations from pollution or injury.”**
38. It is considered that this blanket ban on planting is not appropriate and that Objective FYO3 as proposed to be amended in point 38 above is sufficient to address this issue.
39. It is considered that the inclusion of a list of recreational forests is not necessary.
- 40. It is recommended that Objective FYO5 be incorporated into the development plan stating “*Prepare in co-operation with the Forest Service of the Department of***

Agriculture, Food and the Marine, an Indicative Forestry Strategy for the County during the lifetime of the plan where resources permit.”

41. It is recommended that Objective FYO3 be amended to state ***“~~Protect–Resist~~ afforestation proposals that would adversely affect designated habitats, natural waterbodies, wildlife habitats, conservation areas, heritage areas, areas of amenity, archaeological sites, scenic routes and artefacts within forest sites and ~~nature designations from pollution or injury.~~”***
42. The NeighbourWood Scheme funds the development of attractive close-to-home woodland amenities (or ‘neighbourwoods’) for public use and enjoyment. **It is recommended that Objective RAO15 should be included in the development plan to state “Facilitate and promote the NeighbourWood Scheme in County Monaghan.”**
43. As point 8 above.
44. It is considered that the draft plan should remain unchanged in this regard.
45. The list of activities in Section 5.11.2 is not an exhaustive one.
46. The majority of these features are listed in the appendices, therefore it is not considered necessary to list them in Section 5.11.2.
47. **It is recommended that Objective TRO5 be amended to read “Promote and facilitate the use of cycling and walking as alternative sustainable modes of transport *in accordance with the provisions of the National Cycle Policy Framework 2009-2020.***
48. It is considered that there is no necessity for the inclusion of this text.
49. It is considered that the current arrangement of policies and sub sections is adequate.
50. It is considered that the wording of Objective RAO10 is sufficient to fulfil the requirements of the Planning and Development Act 2010.
51. It is considered that the wording of Objective RAO11 is sufficient to fulfil the requirements of the Planning and Development Act 2010.
52. The Planning and Development Act 2010 requires that the development plan include an objective for identification of public rights of way on maps and by list. There is no requirement to have this completed for the adoption of the development plan.
53. It is considered that the annual identification and inclusion of public rights of way would result in duplication of effort and that it would be more appropriate to establish a list and propose include it within the development by way of single variation.
54. It is considered that the wording of Objective RAO10 and RAO11 are sufficient to fulfil the requirements of the Planning and Development Act 2010.
55. As point 50 above.
56. It is considered that the wording of Objective RAO9 is sufficient to fulfil the requirements of the Planning and Development Act 2010.
57. As point 50 above.

58. It is considered that the inclusion of such a policy would be inappropriate.
59. As point 50 above.
60. As point 50 above.
- 61. It is recommended that the second paragraph of Section 7.5 includes the following statement “Walking and cycling represent an important way to discover and enjoy the pleasures of rural areas.”**
62. It is considered that the contents of this paragraph are more appropriately contained within the explanatory text.
63. It is considered that Objective CWO3 is sufficient to address the issue.
64. It is considered that Objective CWO4 should remain in its current format.
65. It is considered that Objective CWO5 is sufficient to address the issue.
66. It is considered that the walking and cycling strategy proposed in Objective CWO3 is sufficient to address this issue.
67. The promotion of the Irish Trails Strategy is outside the remit of the development plan.
68. It is considered that Objectives RAO10 and RAO11 sufficiently address this issue. Health promotion and awareness campaigns for walking and cycling are outside the remit of the development plan.
69. It is considered that Objectives CWO3, CWO4 and CWO5 are sufficient to address this issue. The behavior of road users is outside the remit of the development plan.
- 70. This issue is addressed by Objective CWO6. However, it is recommended that CWO6 be amended to state “Identify safe and convenient *walking and cycle* routes in urban areas and between the main towns and villages in the county, and provide signage and ancillary facilities at appropriate locations to promote their use, during the lifetime of the plan.”**
71. It is considered that Objective CWO4 sufficiently addresses this issue.
72. The provision of support for the development of routes is outside the remit of the development plan.
73. It is considered that Objective RAO11 sufficiently addresses this issue.
74. This issue will be addressed through Objectives CWO3, CWO4, and CWO6.
- 75. It is recommended that the National Trails Network be listed in the development plan.**
76. As point 71 above.
77. It is considered that Objective RAO11 sufficiently addresses this issue.
78. The promotion and provision of guided walks is outside the remit of the development plan.
79. The imposition of development levies and sourcing of funding is outside the remit of the development plan.
80. It is considered that Objective CWO4 sufficiently addresses this issue.

81. It is considered that Objective TMO14 sufficiently addresses this issue.
82. It is considered that Objective CWO5 sufficiently addresses this issue.
83. It is considered that Objective RAO11 sufficiently addresses this issue.
84. It is considered that Objectives GIO1 and GIO2, and Policy GIP1 sufficiently address this issue.
85. This matter is outside the remit of the development plan.
86. It is considered that Objectives CWO2, CWO3 and CWO4 sufficiently address this issue.
87. It is considered that Objectives CWO2, CWO3, CWO4 and CWO6 sufficiently address this issue.
88. It is considered that Objective CWO6 sufficiently addresses this issue.
89. The appointment of a cycling officer is outside the remit of the development plan.
90. It is considered that the Natural and Built Heritage section in Chapter Eight relates to settlements.
91. It is considered that the Recreation and Amenity section in Chapter Eight relates to settlements.
92. It is considered that the Tourism section in Chapter Eight relates to settlements.
93. It is considered that Policy STO4 is appropriate.
94. It is considered appropriate that Policy AFP5 be within Chapter 15.
95. It was considered necessary to mention the protection of public rights of way in Policy EIP7, given the extent of area encompassed by extractive industry sites. However, it is considered that Objective RAO10 provides sufficient protection to public rights of way in general.
96. It is considered that Objective RAO10 provides sufficient protection to public rights of way.
97. It was considered necessary to mention the protection of public rights of way in Policy EIP7, given the nature of works and extent of area encompassed by extractive industry sites. However, it is considered that Objective RAO10 provides sufficient protection to public rights of way in general.
98. It is considered that Policies LPP1, LPP2, LPP3, PAP1, PAP2, SAP1, SAP2, AVP1, AVP2, TEP8 and TEP9 sufficiently address this issue.
99. It is considered that Policy EIO7 is sufficient in this regard.
100. It is considered that Policies LPP1, LPP2, LPP3, PAP1, PAP2, SAP1, SAP2, AVP1 and AVP2 sufficiently address this issue.
101. It is considered that the draft plan contains sufficient objectives and policies to ensure that the environmental impacts of any development are given due regard, and that development will only proceed where mitigation is provided in respect of these impacts.
102. It is considered that Objective RAO10 provides sufficient protection to public rights of way.
103. It is considered that Objective RAO10 provides sufficient protection to public rights of way.

104. It is considered that the draft development plan contains sufficient objectives and policies to ensure that the environment is protected from inappropriate or environmentally damaging development. The integrity of the planning system, its operation for the benefit of the whole community and the implementation of the objectives and policies of the plan are matters for the development management process.
105. This is a matter for the development management process.

5.48	Submission Ref:	DMCDP48
	Person/Body:	Health Services Executive
	Location:	N/A
	Core Issue:	General

Points Raised

1. Submission sets out the function of the Health Services Executive (HSE)
2. The HSE property portfolio in Monaghan County Council functional area comprises of Clontibret Health Centre, Smithborough Health Centre, Scotstown Health Centre, Ballybay Health Centre and the former Ballybay Health Centre.
3. With the exception of Clontibret Health Centre, all premises are within settlement envelopes with the latter two being zoned Town Centre.
4. The objectives to develop the tier 1, 2 and 3 towns as service centres for their surrounding hinterlands and to sustain the vitality of the villages as service centres for rural communities are referred to.
5. The objective to provide an appropriate range of services and facilities for the elderly and improved medical facilities is referred to.
6. Objectives SSO8, SSO16 and SSO17 which seek to promote the towns as service centres, to ensure a range of services an appropriate to the settlements within the county, and to promote sustainable compact development forms, are referred to.
7. The HSE supports defined development limit for Smithborough and Scotstown.
8. The HSE supports the zoning of the two premises in Ballybay as Town Centre
9. The zoning objective A (Town Centre) in Section 8.3.1 should be consistent with its identification TC in the zoning matrix in Table 8.1.
10. The HSE supports the zoning of many of its premises as Community Services and Facilities, however, the development of residential institutions / nursing homes on Community Service and Facilities zoning should be amended from not normally permitted to acceptable in principle, and on Town Centre zoning should be amended from open for consideration to acceptable in principle.
11. There should only be one entry for nursing homes in the development zoning matrix.
12. There should be a section on health and medical facilities after the section on schools and education in Chapter Seven.
13. Objective SSO2 should be amended to include 'community, health and social infrastructure'.
14. The HSE supports Objective SSO6 but suggests that it should be amended to include 'medical.'
15. Objective SSO8 should be amended to include 'health and community'.

16. Objective SSO16 should be amended to include 'community, medical and health'.
17. Objective SSO18 should be amended to include a reference to the need for health, medical and care infrastructure to accommodate an aging population.
18. 'Health' and 'medical' should be included in the title of zoning objective G.
19. The contents and objectives within Section 7.10 are noted.
20. The HSE supports Objective UDO6 relating to reuse of derelict property/land, but suggests that reuse of these properties should not be restricted to residential purposes.
21. Objective TCO2 should be amended to include 'community and health'
22. The HSE supports Objective BBO2 relating to the protection of streetscape and heritage.
23. The HSE supports Objective BBO6 relating to the regeneration of the town centre, but requests that it be amended to include 'health and community'
24. There should be a section on community services and facilities in the Ballybay Town plan.

Response of the Manager

1. Noted.
2. Noted.
3. Noted.
4. Noted.
5. Noted.
6. Noted.
7. Noted.
8. Noted.
9. Noted.
- 10. It is recommended that the zoning matrix be reviewed to correct any anomalies.**
- 11. As point 10 above.**
12. As the local authority has no role in providing health or medical facilities, it is considered not necessary to incorporate a section in the development plan on health and medical facilities.
13. It is considered that Objective SSO2 is sufficient in this regard.
- 14. It is recommended that Objective SSO6 should be amended to include 'medical.'**
15. It is considered that Objective SSO8 is sufficient in this regard.
16. It is considered that Objective SSO16 is sufficient in this regard.
17. It is considered that Objective SSO18 is sufficient in this regard.
18. It is considered that title of zoning objective G is sufficient in this regard.
19. Noted.
20. It is considered that Objective SSO25 addresses this issue sufficiently.
21. It is considered that Objective TCO2 addresses this issue sufficiently.

22. Noted.
23. It is considered that Objective BBO6 addresses this issue sufficiently.
24. As the local authority has no role in providing health or medical facilities, it is considered not necessary to incorporate a section in the development plan on health and medical facilities.

5.49 Submission Ref: DMCDP49
Person/Body: Dublin Airport Authority
Location: N/A
Core Issue: General

Points Raised

The Dublin Airport Authority has no objections.

Response of the Manager

Noted.

5.50	Submission Ref:	DMCDP50
	Person/Body:	Eamonn Callaghan
	Location:	Ballinode
	Core Issue:	Sustainable Energy, Transportation, Litter Control and Protected Structures

Points Raised

1. Assist the local community to promote and develop the village as a sustainable energy community by integrating sustainable energy technologies in the commercial and residential sectors of the village.
2. Weight limits should be applied to the use of HGVs of local roads in the interest of road safety and protecting the investment in these roads.
3. Landowners whose property adjoins a public road should be obliged to remove all roadside litter deposited there, including debris from hedge cutting operations.
4. Introduce traffic calming measures in Ballinode in the interests of road safety.
5. Proceed with appropriate traffic calming measures at three roads junction at the Scotstown end of the village.
6. Consider the application of protected structure status on the former RIC Barracks and the former Creamery building in the village. These designations would advance the village as a heritage focal point and build on the achievements of the Vincent McAree museum.

Response of the Manager

1. Noted. The draft development plan contains objectives and policies to encourage energy efficiency and a reduction in energy usage.
2. This issue falls outside the remit of the Development Plan, and is therefore not applicable to the Draft Monaghan County Development Plan 2013-2019.
3. This issue falls outside the remit of the Development Plan, and is therefore not applicable to the Draft Monaghan County Development Plan 2013-2019.
4. This issue falls outside the remit of the Development Plan, and is therefore not applicable to the Draft Monaghan County Development Plan 2013-2019.
5. This issue falls outside the remit of the Planning Authority, and is therefore not applicable to the Draft Monaghan County Development Plan 2013-2019.
6. There is currently ongoing a review of the record of Protected Structures in the County. It is recommended that consideration of both buildings being designated as protected structures be included in this review. Any proposals to designate these buildings as protected structures would be presented to the elected members in conjunction with any other proposals to amend the Record of Protected Structures.

5.51	Submission Ref:	DMCD51
	Person/Body:	History Festival of Ireland
	Location:	Bawn
	Core Issue:	Knappagh water System and Bawn as a Tier 6 Settlement

Points Raised

1. A part of the Knappagh water system, the proposed Natural Heritage Area of Lough Bawn is a fragile and ancient biodiversity wetland resource which is rich in fen and sedge. Further developments which might adversely affect this resource should be resisted.
2. Any such development, be they housing, drainage or peat extraction, must show complete needs based justification and carry explicit mitigation measures.
3. Lough Bawn should be removed from the Tier 6 settlement hierarchy.

Response of the Manager

1. The draft development plan contains objectives and policies to protect designated sites, biodiversity and habitats in general, and for the protection of water resources and wetlands. It is not considered that the designation of Bawn as a Tier 6 settlement in the development plan will result in the loss of ecology surrounding Lough Bawn.
2. The draft development plan contains objectives and policies to protect designated sites, biodiversity and habitats in general, and for the protection of water resources and wetlands. It is not considered that the designation of Bawn as a Tier 6 settlement in the development plan will result in the loss of ecology surrounding Lough Bawn.
3. Bawn has historically been a rural focal point at a crossroads, having a number of community facilities such as a church, a parochial hall, a handball alley, a public house and a post office in its vicinity. Bawn as a rural focal point would be considered to constitute a Dispersed Rural Community or Tier 6 settlement as set out in Chapter Three of the Monaghan County Development Plan 2013-2019. Therefore Bawn is considered to be a settlement.

5.52 Submission Ref: DMCDP52
Person/Body: Liam Murtagh
Location: N/A
Core Issue: Renewable Energy from Bio-Digesters

Points Raised

1. In the recommendations on agriculture, there is no mention of carbon reduction and energy generation via the development of farm based bio-digesters using farm waste.
2. Encouragement should be given to 'explore/promote or work with other agencies' on this issue which has huge potential to contribute to national targets on CO2 and renewable energy.
3. The area of bio-digestion needs to be developed.

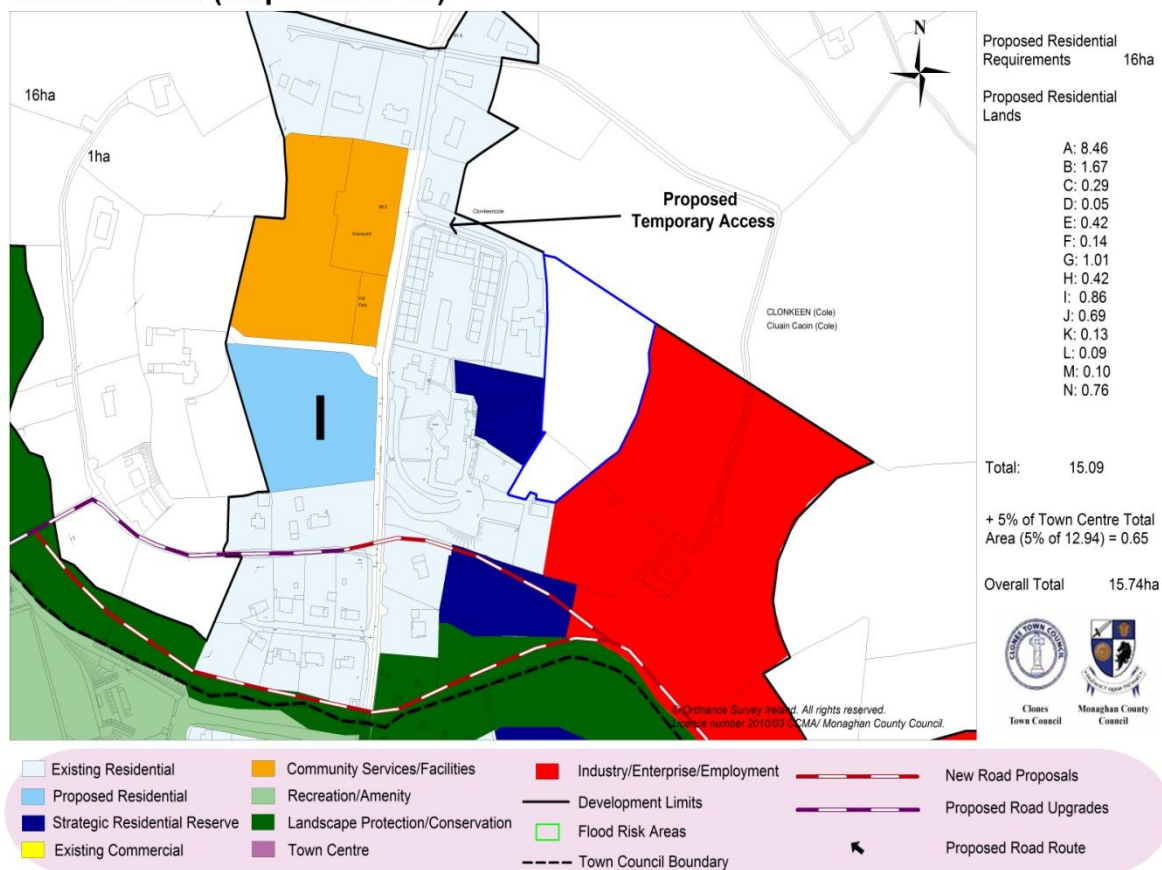
Response of the Manager

1. The draft county development plan contains objectives in Chapter Five in respect of reducing green house gas emissions, and encouraging the generation of renewable energy, including biomass. The draft plan also contains a policy within the Renewable Energy section of Chapter 15 of the Draft Monaghan County Development Plan facilitate the sustainable development of renewable energy generation technology.
2. Noted. Policies contained within the Renewable Energy section of Chapter 15 of the Draft Monaghan County Development Plan facilitate the sustainable development of renewable energy generation technology.
3. Noted.

5.53 Submission Ref: DMCDP53
 Person/Body: Enda Connolly
 Location: Gortnawinney, Clones – Refer to Map DMCDP53
 Core Issue: Zoning of Lands for Industry/Enterprise/Employment

Clones Town (Map DMCDP53)

Draft Monaghan County Development Plan 2013-2019



Points Raised

1. Consider including a further one acre (approx) of land to be designated for Industry/Enterprise/Employment, as outlined in blue on Map DMCDP53
2. The subject land is a narrow strip and the Draft Plan zoning could potentially isolate it from other agricultural land and therefore reduce its value in the future.
3. Should there be interest from a developer/enterprise to develop these lands prior to the construction of the Monaghan Road to Roslea Road link road, temporary access could be provided via existing housing access adjacent to the new grave yard.
4. The gradient of the subject land should not be a reason for the exclusion of the lands as the gradients are gradual.

5. Attention should be drawn to planning permission ref. 08/309 which shows a committed interest in the land. Previous experience would suggest that any interested party would want the subject land included.

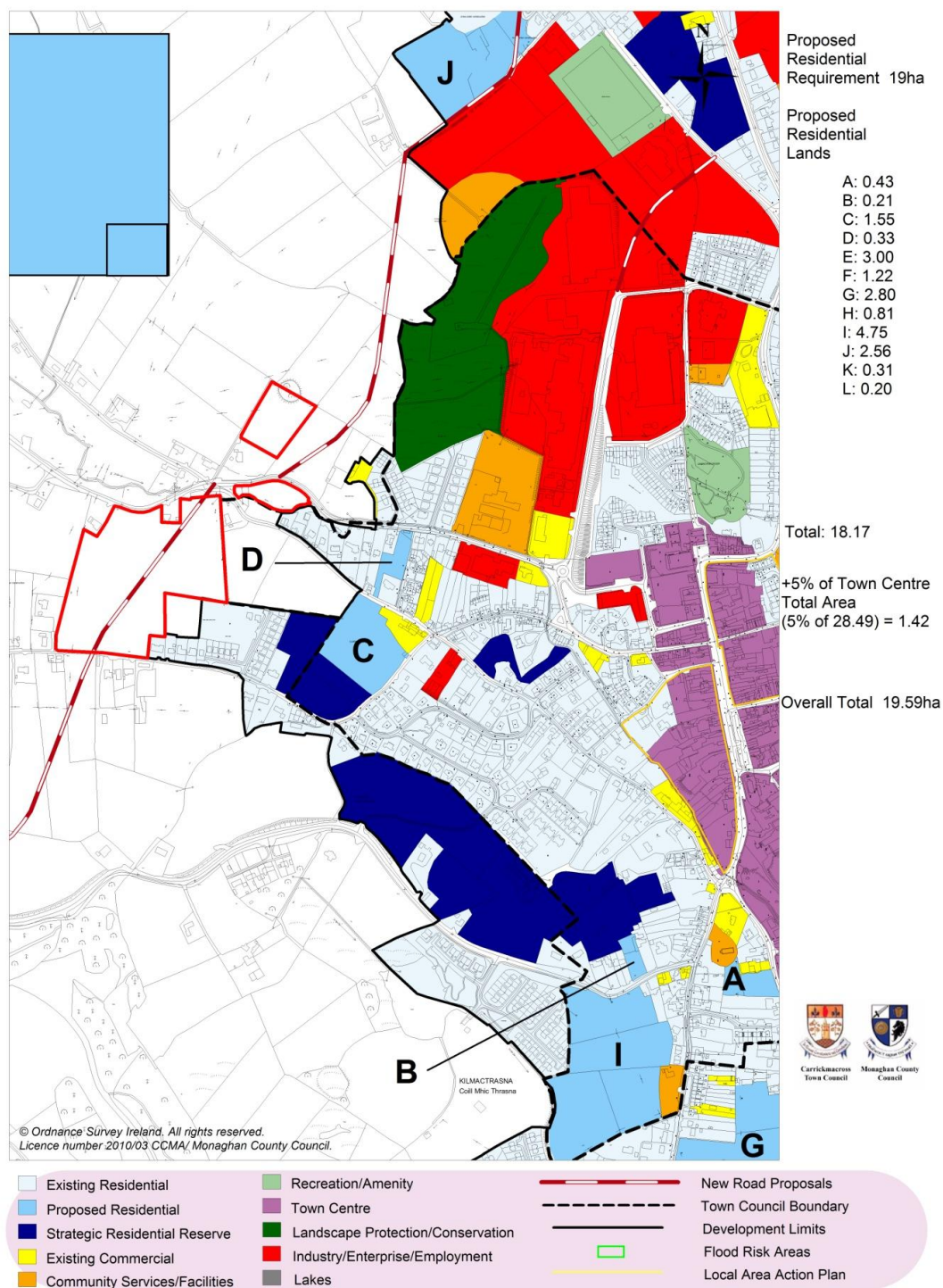
Response of the Manager

1. Approximately 35 hectares of land has been zoned for Industry, Enterprise and Employment in the Draft Town Plan for Clones and this is considered sufficient to accommodate the anticipated level of industrial and enterprise development in the town during the life of the plan. The lands already zoned in the draft plan as Industry, Enterprise and Employment will provide sufficient capacity for the development of the town's industrial base during the plan period. In addition the subject lands provide a buffer zone between lands which are zoned as Industry, Employment and Enterprise in the draft development plan and the existing residential development to the west of the subject lands.
2. It is not considered reasonable to state that the subject lands will be landlocked, particularly as they are linked to other agricultural lands by a significant length of their northern boundary.
3. It is considered that the use of an existing access serving residential development would not be appropriate as an access to serve industrial development, particular given the standard of its width, gradient and intersection with the Roslea Road.
4. Industrial development generally involves buildings with large footprints and large ancillary yards. Sites with steeper gradients are avoided as they would necessitate significant excavation to create a working level for these buildings and yards.
5. Section 10(8) of the Planning and Development Acts 2000-2010 specifically states "*There shall be no presumption in law that any land zoned in a particular development plan (including a development plan that has been varied) shall remain so in any subsequent development plan*" Application 08/309 for housing, which was ultimately refused, was made over five years ago in different economic circumstances. **For the reasons stated in points 1, 2, 3 and 4 above, it is recommended that the subject lands be excluded from the settlement envelope of Clones and are not zoned for Industry, Enterprise and Employment.**

5.54 Submission Ref: DMCDP54
 Person/Body: Michael, Micheal and Emer McKittrick
 Location: Carrickmacross – Refer to Map DMCDP54
 Core Issue: Inclusion of lands for Residential Development and Removal of Proposed Link Road

Carrickmacross Town (Map MDCDP54)

Draft Monaghan County
 Development Plan 2013-2019



Points Raised

1. Submission relates to approximately 6.5 hectares of lands to the west of Carrickmacross.
2. Access to the subject lands can be obtained from both the Shercock Road and Lurgans Road.
3. As part of the Cavan-Dundalk Strategic Route Improvement Strategy a cycle track is proposed adjacent to the lands.
4. These measures/facilities will ensure that the subject lands comply with the objectives of “Smarter Travel”, which includes the desire to “reduce distance travelled by private car and encourage smarter travel, including focusing population growth in areas of employment and to encourage people to live in close proximity to places of employment”. The submission lands are in compliance with the aforementioned objectives.
5. Carrickmacross functions as one of the County’s principle residential, service, employment and retail areas in the North East and in Monaghan in particular. This is acknowledged in Section 10.1.3 of the draft development plan.
6. The Planning and Development (Amendment) Act 2010 introduced the requirement for a Core Strategy and indicates that development plans must include the following objectives:
 - The zoning of land in accordance with the proper planning and sustainable development of the area.
 - The provision or facilitation of infrastructure, including transport, energy and communication facilities, water supplies, waste recovery and disposal facilities.The lands in question comply with these requirements.
7. Submission quotes from Chapter 8 of the development plan and specifically Section 8.3.3, 8.3.4 and Section 8.5 and states that these sections of the plan support the zoning of the lands in question.
8. Submission notes that there are a number of objectives contained within Chapter 8 which support the inclusion of the subject sites for zoning including objectives UDO2 and UDO3.
9. Submission notes that the population of Carrickmacross and its environs has and is continuing to increase.
10. Submission quotes Section 10.7.1 of the draft development plan “There is a general trend in County Monaghan where there is a desire to live on the edge of settlements and in rural area”. Submission notes that development on the lands in question would be consistent with the aforementioned statement.
11. The lands in question are approximately 800m from the town centre of Carrickmacross. In comparison, lands are proposed to be zoned under the draft development plan which are up to 1,575m from the town centre.

12. Submission includes a map which illustrates distances of lands from the town centre. The submission lands are significantly closer to the centre of Carrickmacross than many other lands that are zoned or designated as Strategic Reserve in the draft development plan.
13. Submission notes that a number of sites which have been included within the development limit of Carrickmacross are less suitable for development than the subject lands for the following reasons:
 - Poor quality minimal width local roads.
 - Lands that have no current access.
 - Lack of safe access, in particular from the Magheraboy Road.
 - A lack of safe pedestrian and cyclist connectivity to some of the lands, which is not in compliance with the draft development plan as well as national policies (Smarter Travel, National Cycle Policy Framework).
 - Some lands will require pumping to connect to the town foul sewerage system.
 - Some lands do not have suitable outfall location for surface water system.
 - Some of the lands are unsuitable for development due to their topography.
14. There are issues with other lands on the eastern side of Carrickmacross and along the N2. On many similar national roads throughout Ireland there is usually a setback of 50-100m within which development should not occur largely due to the noise and pollution effects in such close proximity to the road.
15. The National Roads Authority is opposed to entries onto the National network.
16. Lands zoned on the eastern side of Carrickmacross are unsuitable due to the topography, foul will have to be pumped, there are steep gradients therefore extensive earthworks will be required for development increasing the impact of these development on the environment.
17. The subject lands are significantly more suitable for residential development.
18. The draft plan proposes a road through a portion of the lands in question. Submission notes that the designation of this road is aspirational, premature and unnecessarily sterilizes the submission lands. Consequently this road proposal objective should not be included within the draft development plan.
19. The zoning of the subject lands for residential development is in accordance with regional and national policies.
20. Submission lands are located approximately 800m from the town centre which is significantly closer than other lands that are proposed to be zoned under the draft development plan.
21. The lands have all the required services feeding the lands in question (surface, foul, water, ESB, Eircom).
22. The lands are easily accessible for pedestrians, cyclists and car users.

23. The lands are suitable for the development of serviced sites for which demand still exists within the county and beyond.
24. The lands in question are more suitable for development than many of the lands that have been zoned within the draft development plan.
25. The zoning of the subject lands is in line with good planning and sustainable development.
26. There are no environmental issues associated with the lands in question.
27. The lands are in an ideal location for development and are consistent with the requirements of the development plan.
28. The lands are easily accessible to the commercial/employment zones, schools and industrial areas within Carrickmacross.
29. The road proposals are premature until the submission lands through which they pass are zoned.
30. Residential development of these lands offers a logical and natural expansion of the town as opposed to other lands that are zoned under the draft plan.
31. Submission states that the lands or as a minimum a portion of the lands should be zoned under the Monaghan County Development Plan 2013-2019.

Response of the Manager

1. Noted.
2. Noted.
3. Noted.
4. Noted.
5. Noted.
6. The Planning and Development Act 2010 required the inclusion of a Core Strategy within development plans, which dictates that lands should be zoned for residential development based on demand and sequential location. The Settlement/Core Strategy incorporated within the draft County Development Plan has determined the quantum and location of residential lands required during the period of the development based on projected population growth and the sequential approach to land use zoning as stipulated in the Department of Environment, Community and Local Government Guidance Note on Core Strategies, the Development Plan Guidelines and the Sustainable Residential Development in Urban Areas Guidelines published by the Department, and Chapter Five of the National Spatial Strategy. It is considered that the provision of zoned residential land at this location on the periphery of Carrickmacross, and in excess of the plots of land identified as suitable for residential zoning due to their location, would be contrary to the provisions of the Planning and Development (Amendment) Act 2010, the Development

Plan Guidelines for Planning Authorities published by the Department of Environment Heritage and Local Government (DEHLG), and the Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities published by DEHLG. The lands are removed from the footprint of the settlement and would represent an encroachment into the open countryside which would be against the sustainable principle of maintaining compact urban forms.

7. This statement is disputed. One of the key elements of sustainable development and the Core Strategy is compact urban form. The extension of Carrickmacross to include the subject lands would not be in keeping with this principle as there is a significant quantum of lands that are suitable for development, within the existing footprint of the town, closer to the centre of the town. It is considered that this form of development constitutes urban sprawl as it seeks to extend the footprint of the settlement rather than consolidate it. Therefore the zoning of these lands is not compatible with the principle of maintaining compact urban forms. In addition, there is a significant number of plots of land proposed to be zoned for either Proposed Residential or Strategic Residential Reserve designated within the existing footprint of Carrickmacross which are undeveloped.
8. This statement is disputed. Table 3.13 of the draft development plan indicates the amount of zoned residential land required to accommodate the projected population growth of Carrickmacross. The undeveloped plots of land proposed to be proposed zoned either Proposed Residential or Strategic Residential Reserve within Carrickmacross in the draft plan reflect the appropriate quantum of zoned residential lands in a sequential manner.
9. Noted.
10. The reference to Section 10.7.1 is noted. However it is considered that the zoning of the subject lands would be inappropriate as it would give rise to urban sprawl and would fail to consolidate the urban settlement by ensuring development takes place within the footprint of the town, and thus keeping it as physically compact as possible.
11. The Draft Monaghan County Development Plan 2013-2019 seeks to consolidate the existing footprint of the built urban area, and lands have been zoned for residential use with the aim of consolidating the settlement, and encouraging development of vacant plots within the urban footprint.
12. As point 11.
13. The Development Plan Guidelines published by the Department of Environment, Heritage and Local Government and the Border Regional Planning Guidelines permit the zoning of up to 150 percent of the identified required residential lands for the period of the development plan. This ensures that there will be sufficient supply of residential lands that do not have barriers to development. Having established the appropriate quantum of zoned residential land, the local authority has ensured that those lands identified for

residential development are able to avail of existing infrastructure or that proposed for which funding has been committed to.

14. It is considered that Objective UDO8 sufficiently addresses this issue.
15. Noted.
16. Although the lands on the eastern side of Carrickmacross may have some topographical issues, they are not insurmountable. The development of these lands would represent the consolidation of the settlement between existing development and the By pass.
17. As point 6 above.
18. Potential link roads as indicated within the draft development plans are indicative and represent the centre line of a 100 metre wide preliminary corridor. A final route design has yet to be established for the proposed link road and it will be subject to detailed design and relevant consent procedures. **Therefore it is recommended that this proposed link road remains in the development plan.**
19. As point 6 above.
20. As point 7 above.
21. Noted.
22. Noted.
23. Noted.
24. As point 7 above.
25. As point 6 above.
26. Noted.
27. As point 6 above.
28. Noted.
29. As point 18 above.
30. As point 6 above.
31. Section 4.19 of the DEHLG Development Plan Guidelines clearly states that a logical sequential approach should be taken to the zoning of land, where zoning should extend outwards from the centre of an urban area, where emphasis should be placed on infill opportunities and better use of under utilised lands, and where areas to be zoned should be contiguous to existing zoned development land. The Guidelines further state that only in exceptional circumstances should these principles be contravened and any exceptions must be clearly justified by local circumstances and such justification must be set out in the written statement of the development plan. **For these reasons and the reasons set out in points 6, 7, 8, and 10 above, it is recommended that the subject lands are not zoned as Proposed Residential or Strategic Residential Reserve.**

5.55 Submission Ref: DMCDP55
Person/Body: CS Pringle
Location: N/A
Core Issue: Fenestration

Points Raised

1. Request for relaxation on policy in respect of picture windows on the front elevations of new dwellings to allow passive solar gain.
2. Not all houses have an orientation that permits the placing of large windows on the rear to obtain solar gain.
3. This relaxation should be included in the Rural Design Guide for County Monaghan which in turn should be incorporated into the County Development Plan 2013-2019.

Response of the Manager

1. **It is considered that the existing policy RDP10 does not prevent the use of fenestration that can achieve passive solar gain and therefore it is recommended that there is no change to the existing policy.**
2. Larger windows can be employed on the front of dwellings to obtain solar gain provided that the fenestration has vertical emphasis.
3. Objective RDO2 states that a Design Guide for Rural Housing in County Monaghan will be prepared and implemented.

5.56	Submission Ref:	DMCDP56
	Person/Body:	Irish Central Border Area Network
	Location:	N/A
	Core Issue:	General

Points Raised

1. ICBAN welcomes the new Draft Monaghan County Development Plan as a comprehensive and spatially-based plan which can contribute towards the integrated and sustainable development of the county and the wider region.
2. The meaningful consideration of development plans in adjoining areas, including Northern Ireland will help prevent the continuation of the previous problem of 'back-to-back' planning along the border.
3. It will be critical for the future prosperity and social development of some of County Monaghan's more disadvantaged areas, in the west and north of the County, that the potential of 'shared services' and cross-border links is exploited. The Plan needs to reflect this.
4. The alignment of the Plan's Core Strategy with the BRA Planning Guidelines helps to ensure that the county's development is properly placed within its wider regional context. In particular,
5. The concept of 'critical mass' to support the drive for growth of the main towns, especially Monaghan town makes sense, particularly as it can be seen that Monaghan is indeed one of the smallest district towns within the Central Border Region
6. The 2013–2019 Plan needs to be based upon the 2011 Census rather than the 2006 figures.
7. Four of the five towns in the County have grown considerably between 2002 and 2011, with the exception of Clones which has contracted by 10%.
8. It would be more appropriate to consider the longer-term trends e.g. 2002-2011 as a better indication than just the 2006-2011 downward trend.
9. ICBAN has been lobbying for the upgrading of the A5 – N2 transport corridor as a major piece of essential infrastructure for the Region and is currently finalising the publication of an important Advocacy Document / Business Case for this road. It is important that the Monaghan County Development Plan continues to promote the full completion of the originally planned route, including that section from the border to Emyvale and onward to Dublin.
10. The Plan should also actively support the development of the critical A4 – N16 east-west route which would link north Monaghan to Sligo and Belfast / Larne gateways (also included in the above-mentioned ICBAN report).

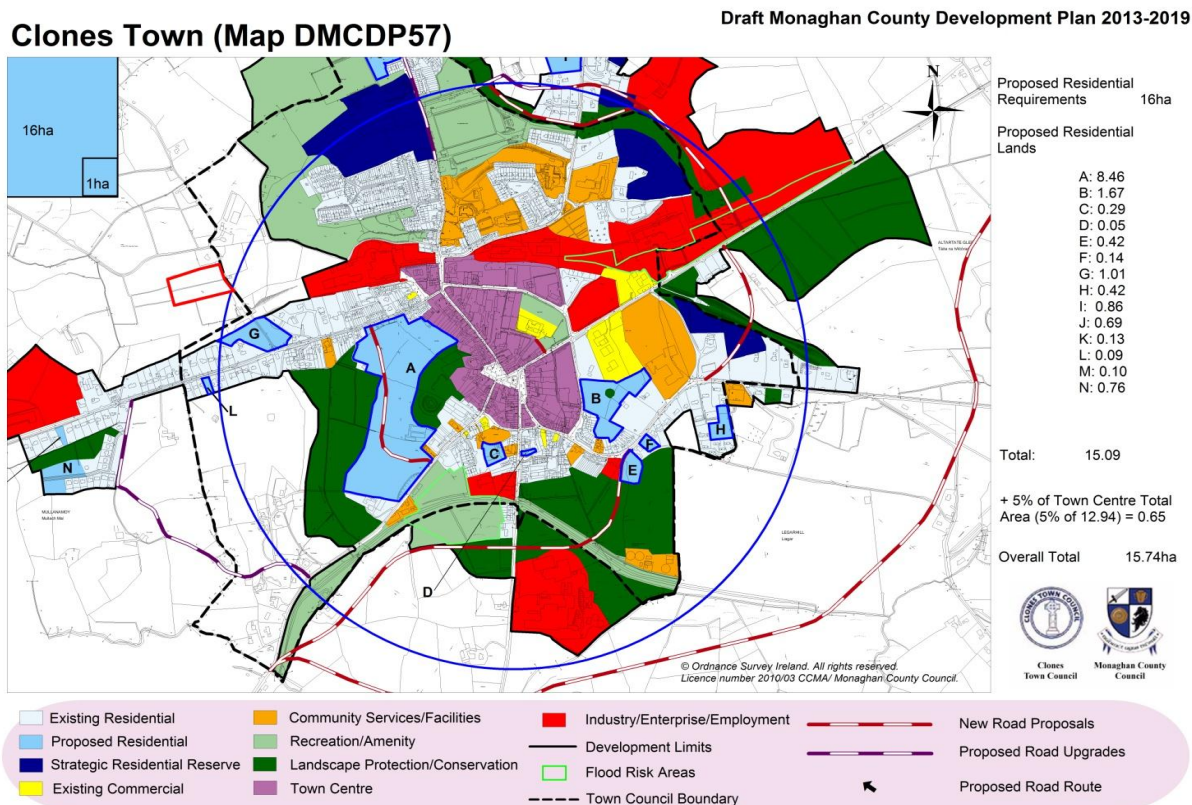
11. The recent Telecommunications Report led by ICBAN should be taken into account in the Plan. This Report can be used by Monaghan Council in lobbying to achieve the enhanced telecommunications infrastructure that County Monaghan needs.
12. It is important to recognise the importance of collaboration with other counties / districts, for example: in tourism, (Ulster Canal marketing) retail (cross-border shopping) and industry (quarry equipment engineering or food processing). The Plan should seek to anticipate such collaboration and to facilitate any resulting land-use requirements.
13. Welcomes the Plan's 'spatial' planning approach, as it addresses the key issues of economic development, infrastructure, housing, environmental and social infrastructure in an integrated manner.
14. As stated in the draft plan, INTERREG funded programmes must inform the Plan.
15. ICBAN's Spatial Planning Initiative should help towards the Council's implementation and monitoring of the Plan and, in the longer-term, towards its review.
16. It will be important that Monaghan County Council continues to input to the emerging Vision Plan for the Central Border Region to ensure that the development plan's policy and objectives are compatible with and compliment those in the Vision Plan.

Response of the Manager

1. Noted.
2. Noted and agreed.
3. Noted.
4. Noted and agreed.
5. Noted.
6. The final population figures for the Tier 1, 2, 3 and 4 settlements set out in the Census 2011 data have been reviewed, and it is considered that the target population growth for these settlements over the period 2011-2019 as set out in Table 3.13 of the Core Strategy is generally in keeping with the growth pattern of these settlements over the period 2006-2011. Where there is some discrepancy, it is considered that the target population growth still represents the likely growth scenarios for the settlement as it is based on growth patterns over a 15 year period and not the five year period of the last census. The target population growth will be subject to review under the statutory two year review of the development plan in 2015.
7. Noted.
8. As point 6 above.
9. The draft plan includes objectives which support the development of the A5-N2 transport corridor and the proposed realignment between Clontibret and the Border.

10. **It is recommended that the proposal for the realignment of the N2/A5 road which forms part of the Northern Cross in the Regional Planning Guidelines be referred to in Section 6.2.10 of the draft plan.**
11. Noted.
12. Noted and agreed. It is recommended that the development plan facilitates land uses resulting from collaboration with other counties/districts.
13. Noted.
14. **It is recommended that the Interreg Programme should be mentioned in Section 5.4.2 of the draft plan. The following should be inserted as Section 5.4.3 “*Interreg is an initiative that aims to stimulate cooperation between regions in the European Union. It began in 1989, and is financed under the European Regional Development Fund (ERDF). The current programme is Interreg IV, covering the period 2007–2013. The Programme’s two key priorities are co-operation for a more prosperous cross-border region, and co-operation for a sustainable cross-border region. Monaghan Local Authorities have obtained funding for projects such as Castleblayney And South Armagh (CASA) and Clones Erne East Blackwater (CEEB). The CASA project seeks to promote awareness of the CASA region, provide enterprise units in Ballybay, and develop facilities at Lough Muckno and Slieve Gullion. The CEEB project seeks to provide infrastructural development works in rural villages and towns along the Ulster Canal Corridor between Clones and Lough Erne, to provide circular walking/cycling routes and eco-trails on Slieve Beagh and East Fermanagh, to provide basic angling infrastructure in the Erne East area, to develop a training and mentoring programme for twenty businesses, and to develop a cross border integrated marketing programme.*”**
15. Noted.
16. Noted.

5.57 Submission Ref: DMCDP57
 Person/Body: James Corr
 Location: Carn, Clones – Refer to Map DMCDP57
 Core Issue: Zoning of Lands for Housing



Points Raised

Mr. Corr wishes to state his intention to develop the subject site. (refer to Map DMCDP57 above)

Response of the Manager

A planning application ref. 05/847 for 17 no. two storey dwellings on the subject lands was refused under appeal. The subject lands are zoned Low Density Housing in the current development plan. Section 10(8) of the Planning and Development Acts 2000-2010 specifically states “*There shall be no presumption in law that any land zoned in a particular development plan (including a development plan that has been varied) shall remain so in any subsequent development plan*”.

The Planning and Development Act 2010 required the inclusion of a Core Strategy within development plans, which dictates that lands should be zoned for residential development based on demand and sequential location. The Core Strategy, incorporated within the draft County Development Plan has determined the quantum and location of residential lands

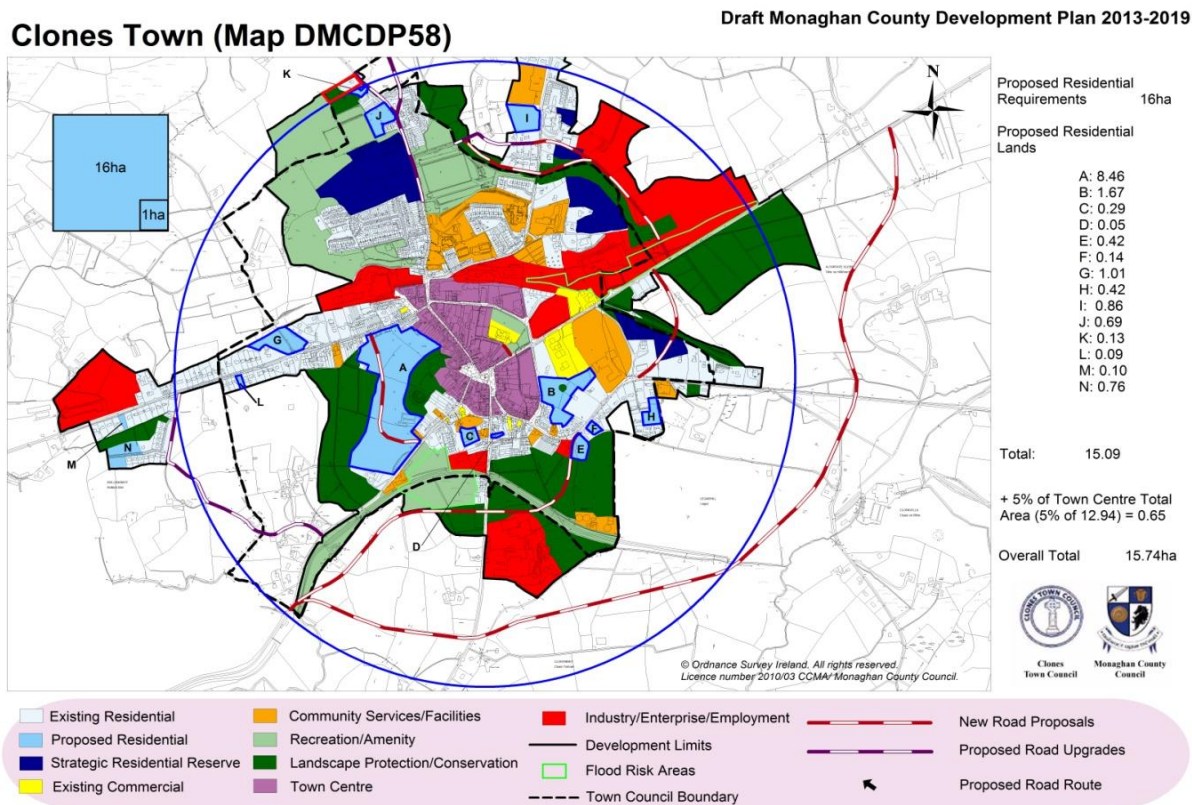
required during the period of the development based on projected population growth and the sequential approach to land use zoning as stipulated in the Department of Environment, Community and Local Government Guidance Note on Core Strategies, the Development Plan Guidelines and the Sustainable Residential Development in Urban Areas Guidelines published by the Department, and Chapter Five of the National Spatial Strategy.

Section 4.19 of the DEHLG Development Plan Guidelines clearly states that a logical sequential approach should be taken to the zoning of land, where zoning should extend outwards from the centre of an urban area, where emphasis should be placed on infill opportunities and better use of under utilised lands, and where areas to be zoned should be contiguous to existing zoned development land. The Guidelines further state that only in exceptional circumstances should these principles be contravened, and any exceptions must be clearly justified by local circumstances and such justification must be set out in the written statement of the development plan.

It is considered that the allocation of over 15 hectares within the footprint of town for Proposed Residential is more than sufficient to accommodate the population growth in Clones over the plan period. In addition, there is approximately the same quantum of land zoned Strategic Residential Reserve within the footprint of town. Therefore the subject lands which are outside the footprint of the town are not required for residential development and should remain excluded from the development envelope of Clones.

In addition, given the limited width of Carn Lane, it is not capable in its current state to accommodate any additional traffic generated by development on these lands. The lands have also been identified as being at risk of flooding or have the potential to cause flooding elsewhere if developed. **Therefore for the reasons set out above, it is recommended that the lands remain outside the settlement envelope of Clones.**

5.58 Submission Ref: DMCDP58
 Person/Body: James Corr
 Location: Liseggerton, Clones – Refer to Map DMCDP58
 Core Issue: Zoning of Lands for Housing



Points Raised

Mr. Corr wishes to state his intention to develop the subject site. (see Map DMCDP58)

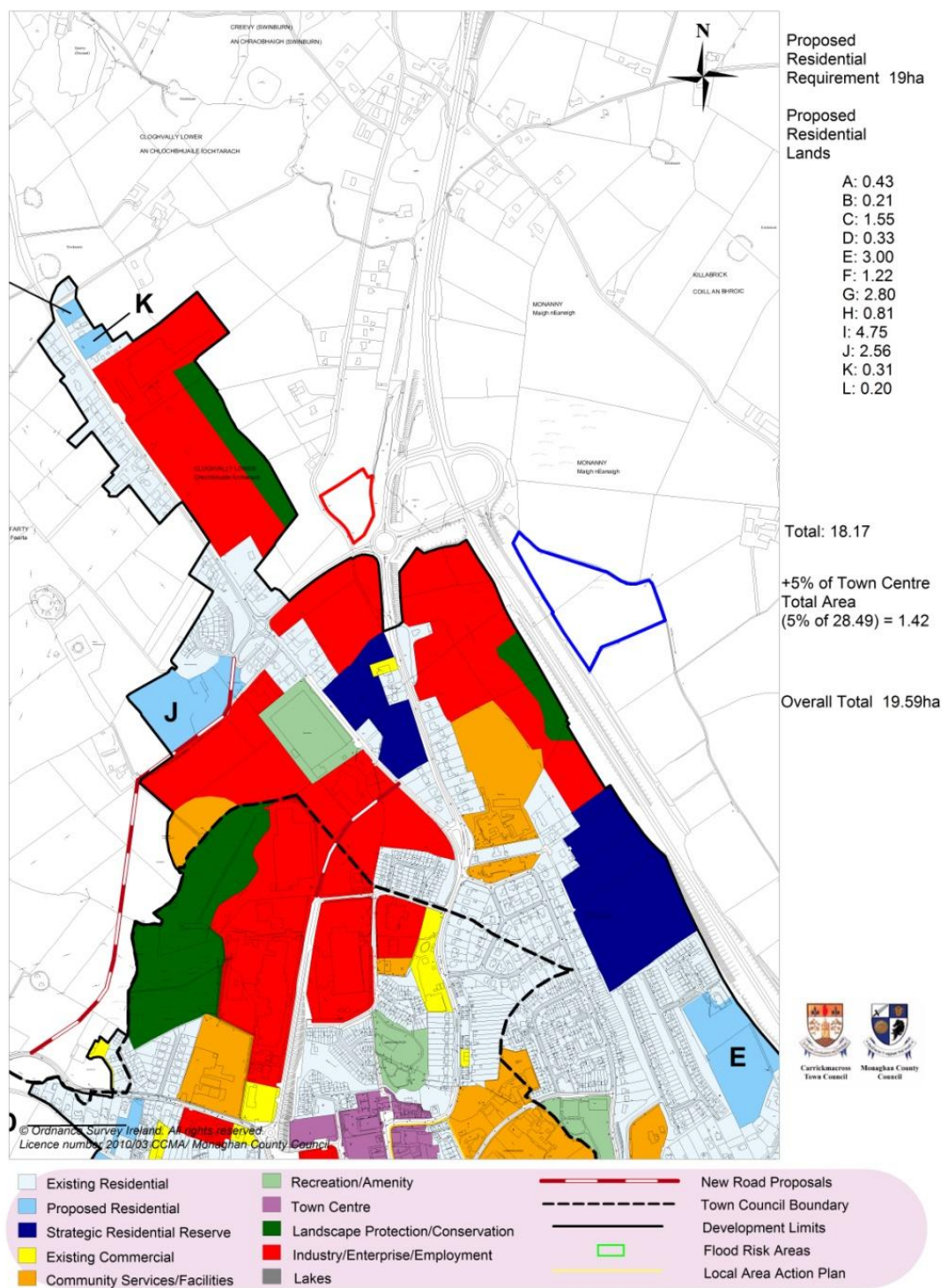
Response of the Manager

The subject lands are zoned Higher Density Housing in the current development plan. In the draft development plan the plot is partly zoned Existing Residential (as there is currently a dwelling in place on it), and partly zoned Landscape Protection/Conservation due to the risk of flooding being identified on the rear portion of the plot. The Existing Residential zoning would permit the redevelopment of the front portion of the plot subject to the proposed development being in keeping with the established built character and it not adversely impacting upon the amenity of existing residential properties.

5.59 Submission Ref: DMCDP59
 Person/Body: Mrs Patricia McNally
 Location: Carrickmacross - Refer to Map DMCDP59
 Core Issue: Rezoning of lands as Proposed Residential and Industry and Employment.

Carrickmacross Town (Map DMCDP59)

Draft Monaghan County
 Development Plan 2013-2019



Points Raised

1. Site outlined in red on map above is zoned for low density housing in the Monaghan County Development Plan 2007-2013. Site outlined in blue is zoned for Industry and Employment in the current county development plan.
2. These sites have not been zoned in the draft county development plan.
3. The lands are strategically placed in relation to the Carrickmacross by-pass which is linked with the M1, and are prominent in terms of location for housing and passing trade for industry and employment.
4. Given the link with the M1 motorway, journey times to Dublin have been reduced. Carrickmacross is therefore more appealing to commuters and commercial industry as it is well placed. This will result in an increase in population and growth in Carrickmacross where there is currently strong commercial/industrial activity.
5. In addition property values are more competitive when compared with those of Dublin and other larger cities and towns. These points will help maintain the local economy in and around Carrickmacross.
6. Access to site A (as indicated in red on the above map) is readily available.
7. Services for site A are located on the link road between the N2 and the Carrickmacross/Ballybay Road.
8. Installation of services at site A would allow for the connection of other properties on the old Castleblayney Road to connect to mains sewerage with the provision of a pumping station within the site.
9. Plans to construct a petrol station with a shop across the road from site A would provide shopping amenities for the site.
10. Site A is within walking distance to the town centre.
11. Low density detached housing would be attractive on site A.
12. Site B (as indicated in blue on the above map) is ideally located along the N2 with a provisional road access off the N2 link road.
13. Site B has had the initial roadway infrastructure put in place for access from the N2.
14. The elevated setting next to the N2 makes site B an ideal site for Industry, Enterprise and Employment.
15. Connection of site B to mains services would be possible through the existing ducting currently in place around the N2.
16. Given the raised construction of the N2 it would be possible to install and place services to site B beneath the existing roadway without interruption to the National Primary Route.
17. The area of site B would easily cater for the accommodation of any on-site services where required.
18. There has been no foreign direct investment from the IDA in this region in recent times.

19. Both sites are easily accessible given the current road layouts and should retain their current zonings.
20. An increase in sites for Industry, Enterprise and Employment in a prime location has benefits for the town of Carrickmacross.
21. Site B is currently zoned as Industry and Employment and there is no reason why it cannot remain zoned in the draft development plan.
22. Windfall taxation will come into force following the removal of the plots from the development limit of Carrickmacross and will therefore remove incentive to sell and develop these strategically located properties.
23. There are no known issues of flooding on either sites.
24. The existing zonings should be maintained.

Response of the Manager

1. Noted.
2. Noted.
3. Noted.
4. Noted.
5. Noted.
6. Noted.
7. Noted.
8. Noted, however it is considered that the extension of development along the Castleblayney Road would represent an encroachment into the open countryside which would be contrary the sustainable principle of maintaining compact urban forms.
9. Noted.
10. There are a number of plots of undeveloped lands within the existing footprint of the settlement which are closer to the town centre than the subject lands.
11. The Planning and Development Act 2010 required the inclusion of a Core Strategy within development plans, which dictates that lands should be zoned for residential development based on demand and sequential location. The Core Strategy incorporated within the draft County Development Plan has determined the quantum and location of residential lands required during the period of the development based on projected population growth and the sequential approach to land use zoning as stipulated in the Department of Environment, Community and Local Government Guidance Note on Core Strategies, the Development Plan Guidelines and the Sustainable Residential Development in Urban Areas Guidelines published by the Department, and Chapter Five of the National Spatial Strategy. It is considered that the provision of zoned residential land at this location on the periphery of Carrickmacross, and in excess of the plots of land identified as suitable for

residential zoning due to their location, would be contrary to the provisions of the Planning and Development (Amendment) Act 2010, the Development Plan Guidelines for Planning Authorities published by the Department of Environment Heritage and Local Government (DEHLG), and the Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities published by DEHLG. The lands are removed from the footprint of the settlement and would represent an encroachment into the open countryside which would be against the sustainable principle of maintaining compact urban forms. **For these reasons it recommended that these lands are excluded from the settlement envelope and are not zoned for either Proposed Residential or Strategic Residential Reserve use.**

12. Site B can only be accessed via the on/off slip road serving the N2 By pass, which is considered to be part of the National road network. The Spatial Planning and National Roads Guidelines published by the Department of Environment, Community and Local Government in 2012 state that access onto national roads is only acceptable when it is demonstrated that the development is of National or Regional Strategic importance.
13. As point 12 above.
14. The lands are removed from the footprint of the settlement and would represent an encroachment into the open countryside which would be against the sustainable principle of maintaining compact urban forms.
15. Noted.
16. Noted.
17. Noted.
18. Noted.
19. Although site A is accessible via the Old Castleblayney Road, site B can only be accessed via the on/off slip road serving the N2 By pass, which is considered to be part of the National road network. The Spatial Planning and National Roads Guidelines published by the Department of Environment, Community and Local Government in 2012 state that access onto national roads is only acceptable when it is demonstrated that the development is of National or Regional Strategic importance.
20. Approximately 55 hectares of land has been zoned for Industry, Enterprise and Employment in Carrickmacross and this is considered sufficient to accommodate the anticipated level of industrial and enterprise development in the town during the life of the plan.
21. Site B is located in a position that is removed from the remainder of the town, and it is considered that the inclusion of the subject lands within the settlement envelope of Carrickmacross would not be in keeping with the sustainable principle of maintaining compact urban forms. It is considered that this form of development constitutes urban

sprawl as it seeks to extend the footprint of the settlement rather than consolidate it and the zoning of these lands for development would not be compatible with the sustainable principle of maintaining compact urban forms.

Preliminary information obtained from historic flood maps, information from the Office of Public Works, contour mapping and LIDAR information, site inspections, and assessment by County Council engineers indicates that the lands on site B are at risk of flooding or their development could cause flooding elsewhere. The principles set out in the Department of Environment, Heritage and Local Government Guidelines “The Planning System and Flood Risk Management (2009)” require the adoption of a precautionary approach being applied to such lands which either are currently at risk of flooding, could be at risk of flooding in the future, or could cause flooding elsewhere if developed.

In addition, approximately 55 hectares of land has been zoned for Industry, Enterprise and Employment in the Draft Town Plan for Carrickmacross and this is considered sufficient to accommodate the anticipated level of industrial and enterprise development in the town during the life of the plan. The lands already zoned in the draft plan as Industry, Enterprise and Employment will provide sufficient capacity for the development of the town’s industrial base during the plan period. **For these reasons it recommended that these lands are excluded from the settlement envelope and are not zoned for Industry, Enterprise and Employment use.**

22. Noted, however, this is a matter outside the control of the development plan.

23. A Strategic Flood Risk Assessment is currently being prepared for County Monaghan. Preliminary information obtained from historic flood maps, information from the Office of Public Works, contour mapping and LIDAR information, site inspections, and assessment by County Council engineers indicates that the lands on site B are at risk of flooding or their development could cause flooding elsewhere. The principles set out in the Department of Environment, Heritage and Local Government Guidelines “The Planning System and Flood Risk Management (2009)” require the adoption of a precautionary approach being applied to such lands which either are currently at risk of flooding, could be at risk of flooding in the future, or could cause flooding elsewhere if developed.

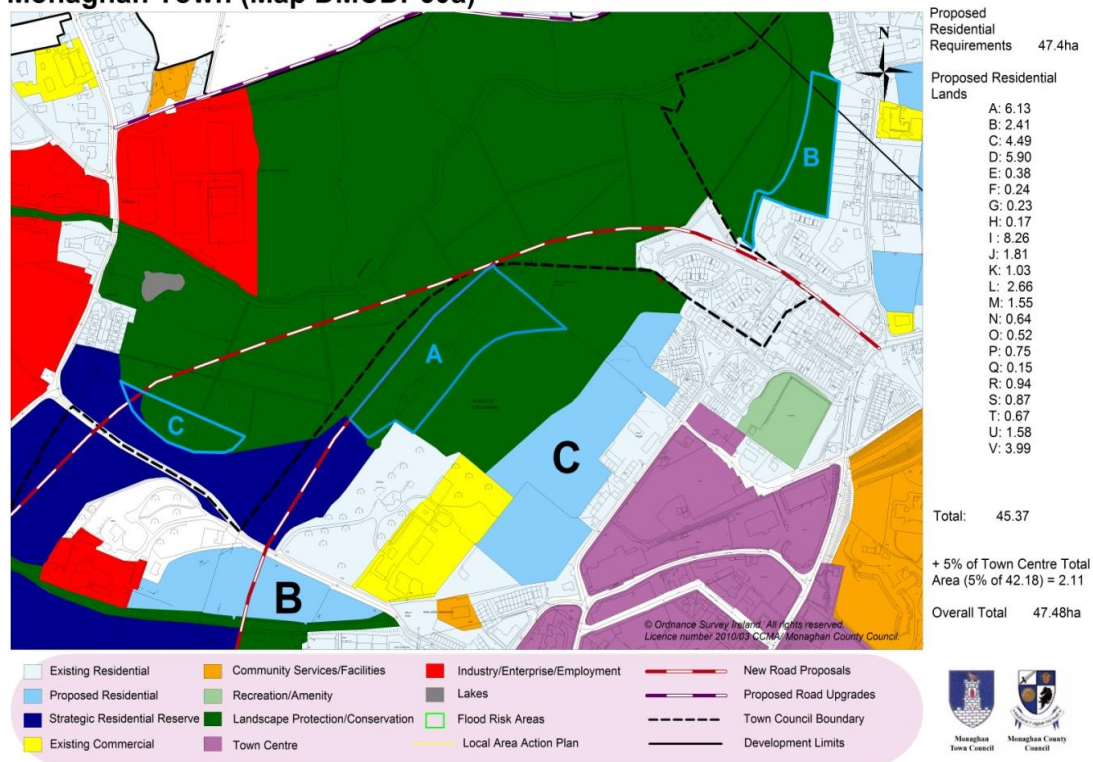
24. Section 4.19 of the DEHLG Development Plan Guidelines clearly states that a logical sequential approach should be taken to the zoning of land, where zoning should extend outwards from the centre of an urban area, where emphasis should be placed on infill opportunities and better use of under utilised lands, and where areas to be zoned should be contiguous to existing zoned development land. The Guidelines further state that only in exceptional circumstances should these principles be contravened and any exceptions must be clearly justified by local circumstances and such justification must be set out in the written statement of the development plan. **For these reasons and those stated in**

points 10. 11. 12, 21 and 23 above, it is recommended that the subject lands are excluded from the settlement envelope of Carrickmacross.

5.60 Submission Ref: DMCDP60
 Person/Body: Nick Patton
 Location: Monaghan Town Refer to Map DMCDP60
 Core Issue: Zoning of Lands as Landscape Protection/Conservation and Realignment of Proposed N2-N54 Link Road.

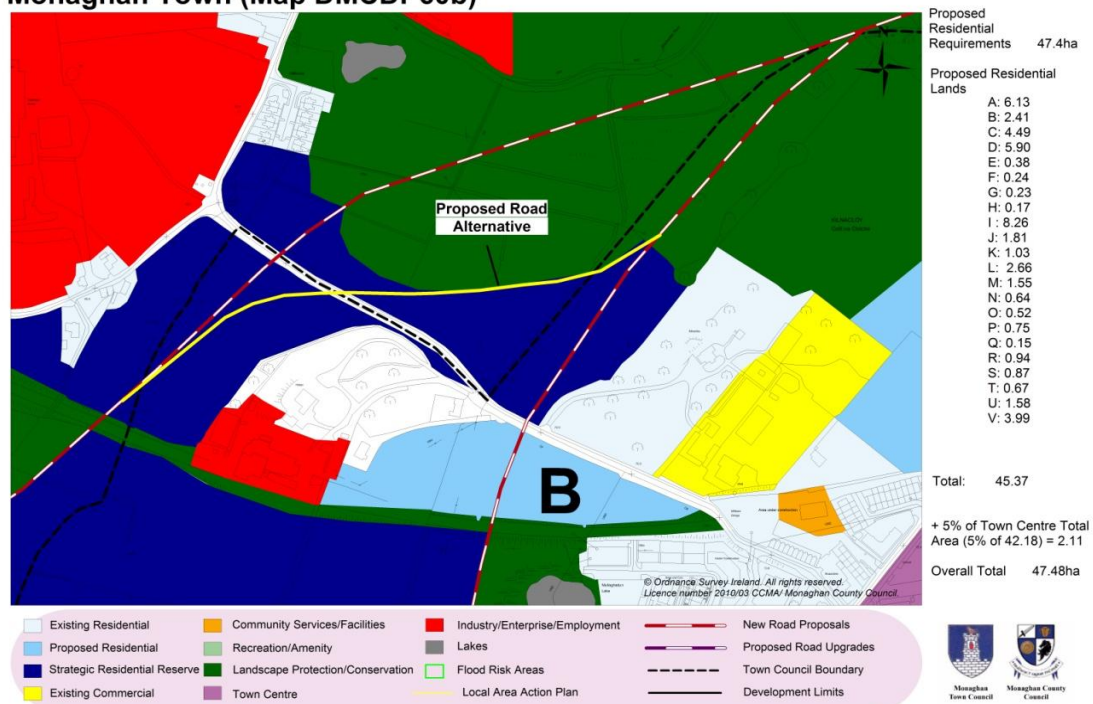
Monaghan Town (Map DMCDP60a)

Draft Monaghan County Development Plan 2013-2019



Monaghan Town (Map DMCDP60b)

Draft Monaghan County Development Plan 2013-2019



Points Raised

1. The draft development plan proposes many significant changes to many of the settlements in County Monaghan which include re-classification of the land and the redefining of the development boundaries of settlements.
2. Two parcels of land within the Town Council functional area (A and B) owned by Mr Patton are zoned as Higher Density Housing in the Monaghan County Development Plan 2007-2013.
3. Mr Patton acknowledges that the required residential lands for the period of the development may have been provided under Proposed Residential, however Mr Patton's lands should be considered as Strategic Residential Reserve.
4. These particular lands are at prime locations and will be largely severed by the proposed N2 to N54 link road which will effectively create a boundary between flood plains and potential development locations.
5. A considerable portion of Mr Patton's lands are in flood plain and his development potential is significantly curtailed.
6. Mr Patton's lands are in close proximity to the River Blackwater and its potential flood plain. The river forms part of the Neagh Bann catchment area which is currently being assessed by the Office of Public Works (OPW) under the national Catchment Flood Risk Assessment and Management Studies (CFRAMs)
7. Maps based on available flood risk data have prepared by Monaghan County Council indicating areas prone to flooding, potential flood plains and lands that would benefit from being drained. They maps have informed the draft development as which lands should be avoided for development.
8. The majority of information contained within the Monaghan County Council maps is from the Office of Public Works which is acknowledged to be at very preliminary stages.
9. The maps produced from the Preliminary Flood Risk Assessment (PFRA) are only at draft stage and the accuracy of the predictions are subject to verification and thus some areas which are shown to be at risk of flooding may not prove not to be at risk.
10. The south eastern boundary of the lands labeled A is elevated between the 70 metre and 80 metre contour line and the proposed link road will be at the 60 metre contour and will form the northwestern boundary of the lands. Therefore these lands are not at risk of flooding.
11. The lands labeled A will have their own internal road network and can be served by a single point of entry onto the proposed N2 to N54 Link Road
12. The development can be contained to not exceeding the highest ground profile to the south east of these lands.

13. The development of the lands labeled A will not create a loss of flood plain storage and thus should be zoned as Strategic Residential Reserve.
14. It is acknowledged that some of the lands labeled B are at risk of flooding and so it is suggested that the part of these lands suitable for development should be reduced accordingly. The lands should be zoned as Strategic Residential Reserve.
15. The ground levels of the lands labeled B rise in a south easterly direction with the eastern boundary of the site at the 70 metre contour line.
16. That part of the lands above the 60 metre contour is not at risk of flooding from the River Blackwater and so if developed will not result in loss of flood plain storage.
17. The lands labeled B should be zoned Strategic Residential Reserve.
18. Mr Patton believes that Monaghan Town should have more areas for recreation and amenity such as walking/bike trails along the river front or a large modern playground facility that is safe, secure and within walking distance yet removed from the town. He is willing to discuss with the local authority regarding the possible development of some of his lands for the people of Monaghan to use for their enjoyment subject to agreement.
19. The design of the proposed link roads should be revisited in light of potential flooding issues arising from the PFRA. A more optimum solution would be to realign the proposed road (as indicated in Map DMCDP60c) to follow the existing contour of the lands to avoid the lower lands that are subject to flooding.
20. The current proposed road alignment will require careful consideration of how the road will affect the existing flood plain, and exacerbation of flooding elsewhere.
21. The proposed realignment of the road will reduce the overall capital cost, removes it from the flood plain and will facilitate access to lands that are capable of being developed.
22. A roundabout could be developed at the new point of intersection of the two road route options.

Response of the Manager

1. Noted.
2. Noted.
3. Noted.
4. Noted.
5. Noted.
6. Noted.
7. Noted and agreed.
8. The suitability of lands for development having regard to flood risk, has been determined not only using preliminary information from the Office of Public Works, but also from

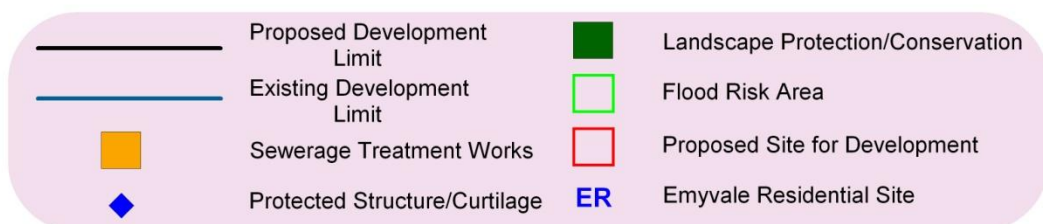
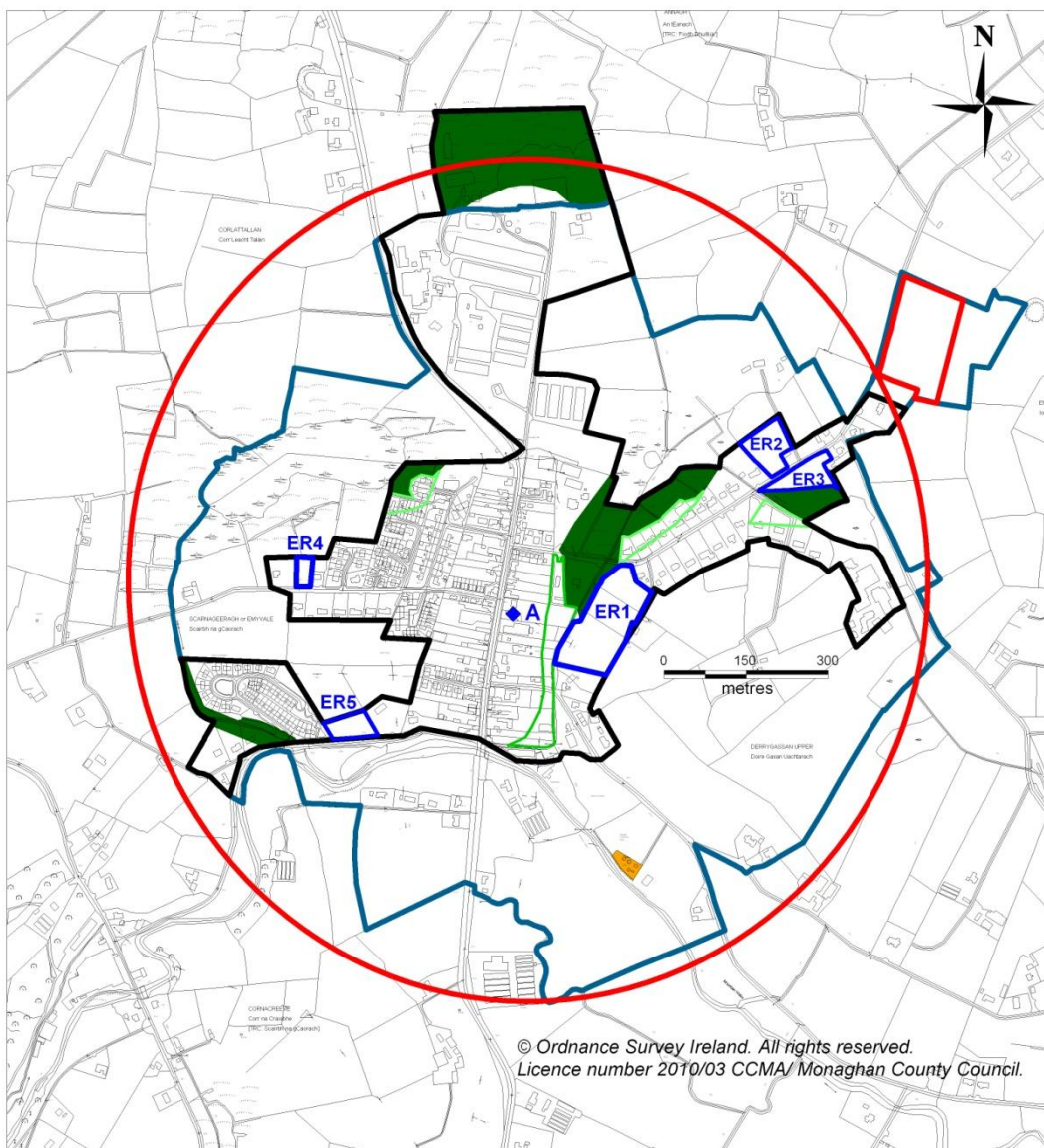
historic flood maps, contour mapping and LIDAR information, site inspections, and assessment by County Council engineers.

9. Although a Strategic Flood Risk Assessment for County Monaghan is currently on going, the suitability of lands for development having regard to flood risk, has been determined not only using preliminary information from the Office of Public Works, but also from historic flood maps, contour mapping and LIDAR information, site inspections, and assessment by County Council engineers. In addition the principles set out in the Department of Environment, Heritage and Local Government Guidelines “The Planning System and Flood Risk Management (2009)” have also been applied. This has resulted in the adoption of a precautionary approach being applied to lands which either are currently at risk of flooding, could be at risk of flooding in the future, or could cause flooding elsewhere if developed. These lands have been excluded from development or restricted to development of a type that has a low vulnerability to flooding or is water compatible. The completed Strategic Flood Risk Assessment for the County will be factored into the statutory two year review of the development plan in 2015 and any necessary changes to the development plan will be progressed by way of variation.
10. The lands labeled A have been designated Landscape Protection/Conservation due their prominent nature in the landscape, the extent of mature tree coverage on them, and the visual amenity provided by the absence of development on them, particularly having regard to their proximity to the River Blackwater Area of Secondary Amenity. **It is recommended for these reasons that the lands labeled A should remain zoned Landscape Protection/Conservation.**
11. It has not been decided whether access for development will permitted onto this link road as yet.
12. Noted, however, it is considered more appropriate that these lands are kept free from development for the reasons outlined in point 10 above.
13. As point 10 above.
14. Although the lands labeled B are at a lesser risk of flooding, the only method of access to these lands is over lands that have historically flooded. Therefore it would be inappropriate to allow residential development to take place on lands that could be made inaccessible by flood waters. In addition, these lands have significant topographical difficulties and as they are close to the River Blackwater, it was deemed appropriate that they should be kept free from development in this Area of Secondary Amenity.
15. Noted.
16. As point 14 above.
17. **It is recommended for the reasons outlined in point 14 above, that the lands labeled B should remain zoned Landscape Protection/Conservation.**

18. The zoning of lands as Landscape Protection/Conservation would not be wholly incompatible with the development of recreational and amenity development. Any proposals for the development of a public park, walk ways or bike trails would not be prejudiced by this land use zoning.
19. A final route design has yet to be established for the proposed link road, and it is clearly set out in Section 9.8.1 that the road proposal lines are indicative and represents the centre line of a 100 metre wide preliminary corridor.
20. Noted and agreed.
21. As a final route design has yet to be established, it is not possible to determine which road alignment would be the lowest overall capital cost. In addition, the cost of the provision of infrastructure would not be the sole determinant in selecting a route design option.
- 22. A final route design has yet to be established for the proposed link road and as the indicative route represents the centre line of a 100 metre wide preliminary corridor, it is recommended that the indicative route remains as indicated.**

5.61 Submission Ref: DMCDP61
 Person/Body: Sean Connolly
 Location: Emyvale - Refer to Map DMCDP61
 Core Issue: Inclusion of Lands within the Settlement Envelop

Emyvale (Map DMCDP61) Draft Monaghan County Development Plan 2013-2019



Development Constraints - EMYVALE

(A) Magee Meats (Protected Structure)

Points Raised

1. Planning permission for twelve houses on the subject lands was granted on 25th July 2008 under ref. 08/255.
2. There is serious congestion on the Main Street of Emyvale and this development on the outskirts of the village would not add to this congestion.
3. The development would allow rural dwellers to live in a small development in the rural area close to the village.
4. The proposed settlement limit is approximately 20 yards from the development and the sewerage system, street lighting and footpath are already adjacent.
5. The adjoining field is in forestry and will act as a buffer.
6. There is no risk of flooding.
7. Mr Connolly has invested heavily in the development of these lands.
8. The proposed development is viable when the directional growth of the village is taken into account.
9. The subject lands are approximately 750 metres from the Main Street.
10. The lands comprise of 4.3 acres and the twelve detached dwellings have been designed to be in keeping with the appearance of the existing dwellings along this approach to the village.
11. The roadside portion of the lands were zoned for residential use and the rear portion of the lands were zoned as Local Landscape Policy Area under the current development plan and should remain as this in the 2013-2019 development plan.
12. A significant amount of lands to the southern side of the village are no longer proposed to be included within the settlement envelop and it is assumed that this is due to the fact that they access onto the N2 National Road, are more suited to agricultural use, and because they are in close proximity to the Mountain Water River and the Landscape Protection/Conservation Areas.
13. A significant amount of lands to the western side of the village are no longer proposed to be included within the settlement envelop and it is assumed that this is due to the elevated nature of the lands, their close proximity to the Back Lough and the Mountain Water River, and potential flood risk.
14. Residential use on lands to the north of the village is prevented by the activities of Silver Hill Duckling food processing unit.
15. The lands to the southeastern side of the village are designated as Local Landscape Protection Area due to their amenity value.
16. The Mullan Road area has been attractive to residential development by locals in the past.

17. The detached dwellings on larger sites along this road interspersed with agricultural lands, has created an excellent environment to live in, and the addition of the Landscape Protection/Conservation to the rear of these houses on lands prone to flooding will enhance the area.
18. The village is expanding to the north east due to the constraints to expansion in other parts of the village and is the only sustainable place for residential development.
19. Development plans have often been prepared without due regard to the intentions or not of landowners to develop, with land zoned where owners do not want to develop it, and land not zoned where the owners want to develop it.
20. If owners do not want to develop large portions of zoned land in the centre of the village, then development of the village would not take place, and the zoning in the development plan would effectively result in stagnation of the village.
21. Controlled ribbon development in well designed clusters on the edge of the village connected to services and amenities is preferable to one off housing in rural areas.
22. There is a housing need in Emyvale with up to 50 persons on the housing list at present, but most of the housing stock is occupied.
23. Chapter 14 of the draft development plan states that Emyvale is the largest Tier 4 village in the county with a higher demand for new housing than all of the other villages.
24. Table 3.12 in the Core Strategy states that the Emyvale housing land requirement is 25.7 hectares and to achieve this, the settlement envelope should be extended along the Mullan Road where there are lands ready for development.
25. The development of the subject lands is not contrary to the requirements of Policies AAP1 to AAP5 or CSP1 and CSP2 as they are well screened from any AA sites.
26. The Sustainable Rural Housing Guidelines for Planning Authorities state that ribbon development can be overcome by accommodating necessary development in rural areas in clustered format well set back from the public road. The development proposed has been designed to meet this criteria.
27. The guidelines state that assessment of what constitutes ribbon development depends on the type of rural area and circumstances of the applicant, whether the development is infill development, and the degree to which ribbon development would be extended or result in coalescence of development.
28. The subject lands although not in the rural area are on the edge of the village and the owner will be financially destroyed if they are not zoned for residential use.
29. The Planning and Development (Amendment) Act 2010 permits the extension of duration of planning permissions to support economic renewal and sustainable development, targeted investment on infrastructure by the State, and to modernize land zoning.

30. Mr Connolly's project is an example of where economic and commercial circumstances beyond his control mitigated against the progression of the development and Government guidance must be taken into account in establishing the settlement envelope of the village.
31. Although the development is not considered infill development it could be the catalyst for infill development on lands between it and the existing development closer to the village.
32. Development on the subject lands would coalesce with existing development to form a continuous residential core.
33. It is the policy of the Government to curtail one off housing close to towns, with one of the reasons being to encourage the building/purchase of houses in core settlements where services are available. The subject lands are located on the edge of the village with all services available or capable of being provided by Mr Connolly.
34. It is considered that the development of the subject lands is the best way for residential development to occur in the village and is in keeping with Chapters 3 and 14 of the draft plan.
35. The zoning of the lands would allow for the controlled development of the village and establish an end to the village which does not exist at present.

Response of the Manager

1. Noted.
2. This statement is contested as the proposed development will generate additional traffic movements at the Mullan Road junction with the Main Street.
3. This statement is contradictory as the lands would be within the village if included within the settlement envelope and not in the rural area.
4. Noted.
5. Noted.
6. Noted.
7. Noted.
8. One of the key elements of sustainable development and the Core Strategy is compact urban form. The extension of the village to include the subject lands would not be in keeping with this principle as there is a significant quantum of lands that are suitable for residential development closer to the centre of the village as indicated ER1-ER5 in Map DMCDP61.
9. Noted.
10. Noted.
11. Noted.

12. These lands are not proposed to be zoned as they lie outside the built footprint of the village and are not required to fulfil the development requirements of the village.
13. As point 12 above.
14. Agreed.
15. As point 12 above.
16. Noted.
17. Noted.
18. Noted, however, there are a number of opportunities to consolidate development of the village on infill sites that are sufficient to cater for the projected population growth of the settlement.
19. It is not the purpose of the development plan to zone land for development on the grounds that the owner intends to develop it. The purpose of the development plan is to ensure the orderly development of land in a sustainable manner which ensures compact urban forms, encourages cycling and walking, makes use of existing infrastructure and minimises urban sprawl and loss of agricultural land.
20. The Department of Environment, Heritage and Local Government Development Plan Guidelines for Planning Authorities and the Regional Planning Guidelines for the Border Region 2010-2022 permit zoning of 150% of the residential land required for a settlement during the plan period to take account of some lands not being released for development. The draft plan has made provision for the zoning of 150% of the residential land required for the settlement during the plan period.
21. Section 4.19 of the DEHLG Development Plan Guidelines clearly states that a logical sequential approach should be taken to the zoning of land, where zoning should extend outwards from the centre of an urban area, where emphasis should be placed on infill opportunities and better use of under utilised lands, and where areas to be zoned should be contiguous to existing zoned development land. The Guidelines further state that only in exceptional circumstances should these principles be contravened and any exceptions must be clearly justified by local circumstances and such justification must be set out in the written statement of the development plan. It is considered that this form of development constitutes urban sprawl and is not compatible with the sustainable principle of maintaining compact urban forms. Residential development on lands within the urban footprint is a more appropriate and sustainable alternative. **For these reasons and the reasons set out in points 8, 12, 18, 19 and 20 above, it is recommended that the subject lands remain outside the settlement envelope and are not zoned for Proposed Residential or Strategic Residential Reserve use.**
22. The Core Strategy is concerned with ensuring there is sufficient zoned residential land to accommodate growth of the population in settlements over the plan period. It is

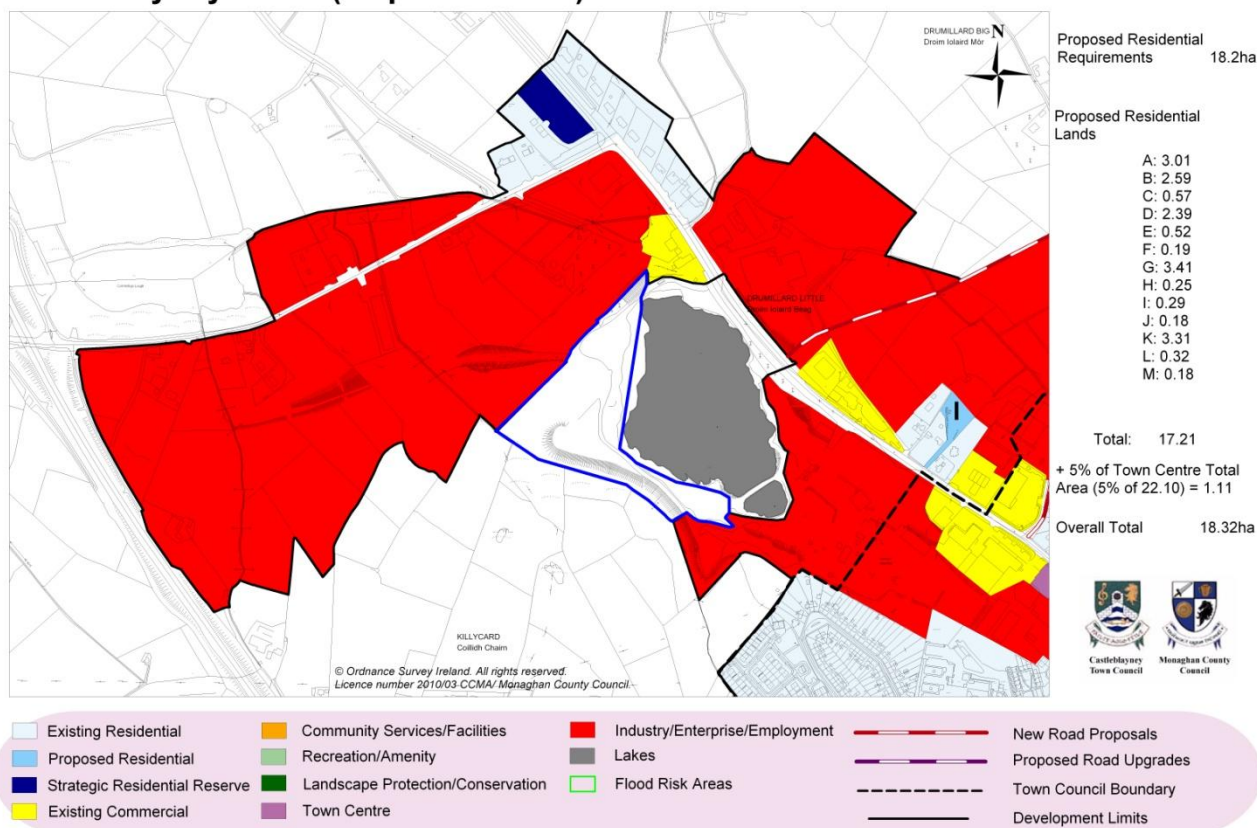
considered that the quantum of undeveloped lands within settlement envelope of the village is sufficient to accommodate the anticipated growth of the village over the plan period.

23. This statement is not contained within Chapter 14 of the draft plan.
24. This figure represents the total quantum of lands needed to accommodate existing and proposed residential development in the village in 2019. Only 1.7 hectares are required to fulfil the projected population growth of the village over the period of the plan.
25. It is contended that the development of the subject lands would be contrary to the provisions of Policy CSP2.
26. The proposed development is roadside development which would exacerbate urban sprawl and ribbon development along Mullan Road.
27. The Sustainable Rural Housing Guidelines relates to rural generated one off housing in the rural area. The proposed development is not considered to be of this type.
28. The financial circumstances of Mr Connolly are not a consideration for the development plan.
29. Noted.
30. The Planning Authority must take account of all Government policy and guidelines in zoning of land for development. It is considered that the zoning of the subject lands would be contrary to the provisions of the Development Plan Guidelines and also the Core Strategy which is a mandatory requirement.
31. As point 21 above.
32. As point 21 above.
33. As point 21 above.
34. As point 21 above.
35. As point 21 above.

5.62 Submission Ref: DMCDP62
 Person/Body: Roadstone Wood Limited
 Location: Castleblayney – Refer to Map DMCDP62
 Core Issue: Inclusion of Lands within the Settlement Envelope

Castleblayney Town (Map DMCDP62)

Draft Monaghan County Development
Plan 2013-2019





Points Raised

1. There are a number of areas that were previously zoned in the current development plan but have been zoned in the draft plan in a way that would result in lands in strategic locations being left undeveloped.
2. Infill opportunities which are currently undeveloped should not be left void and should be zoned similar to the adjoining zonings.
3. The subject lands are zoned Higher Density Housing in the current development plan. Some of the lands owned by Roadstone Wood Limited are proposed to be zoned Industry, Enterprise and Employment in the draft plan, but some are not included within any zoning.
4. Roadstone Wood Limited are satisfied with the Industry, Enterprise and Employment zoning on some of the lands, but are disappointed that the lands surrounding the quarry void are not zoned, particularly as they have been used as part of the quarry for more than fifty years. The lands should not be considered a greenfield site.

5. The removal of zoning on the lands surrounding the void is seen as a lost opportunity and the unzoned lands should be zoned Industry, Enterprise and Employment.
6. Excluding the unzoned lands will sever the link between the lands to the north and the lands to the south of the quarry void, which are both zoned Industry, Enterprise and Employment.
7. The zoned lands are linked by an access road and other infrastructure and the separation of these lands by the unzoned lands will make them difficult to develop as a unified entity.
8. The lands to the north of the quarry void will be land locked as the access to these lands is over the unzoned lands and will affect their future viability.
9. Castleblayney will benefit from an increase in lands zoned Industry, Enterprise and Employment at this prime location.
10. The unzoned lands offers the only wide enough strip of land to connect the lands to the north and south of the quarry void, and if these lands remain unzoned vehicles such as forklifts would have to use the public road to travel between the two zoned parcels of land.
11. There are no known issues of flooding on the unzoned lands.

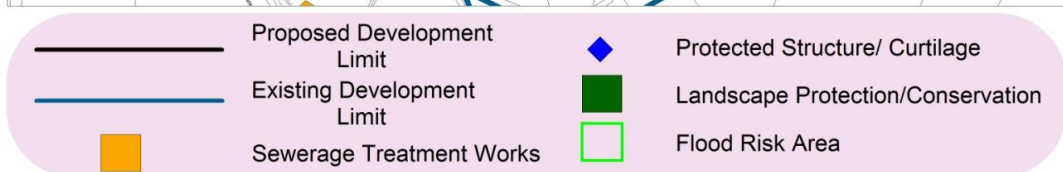
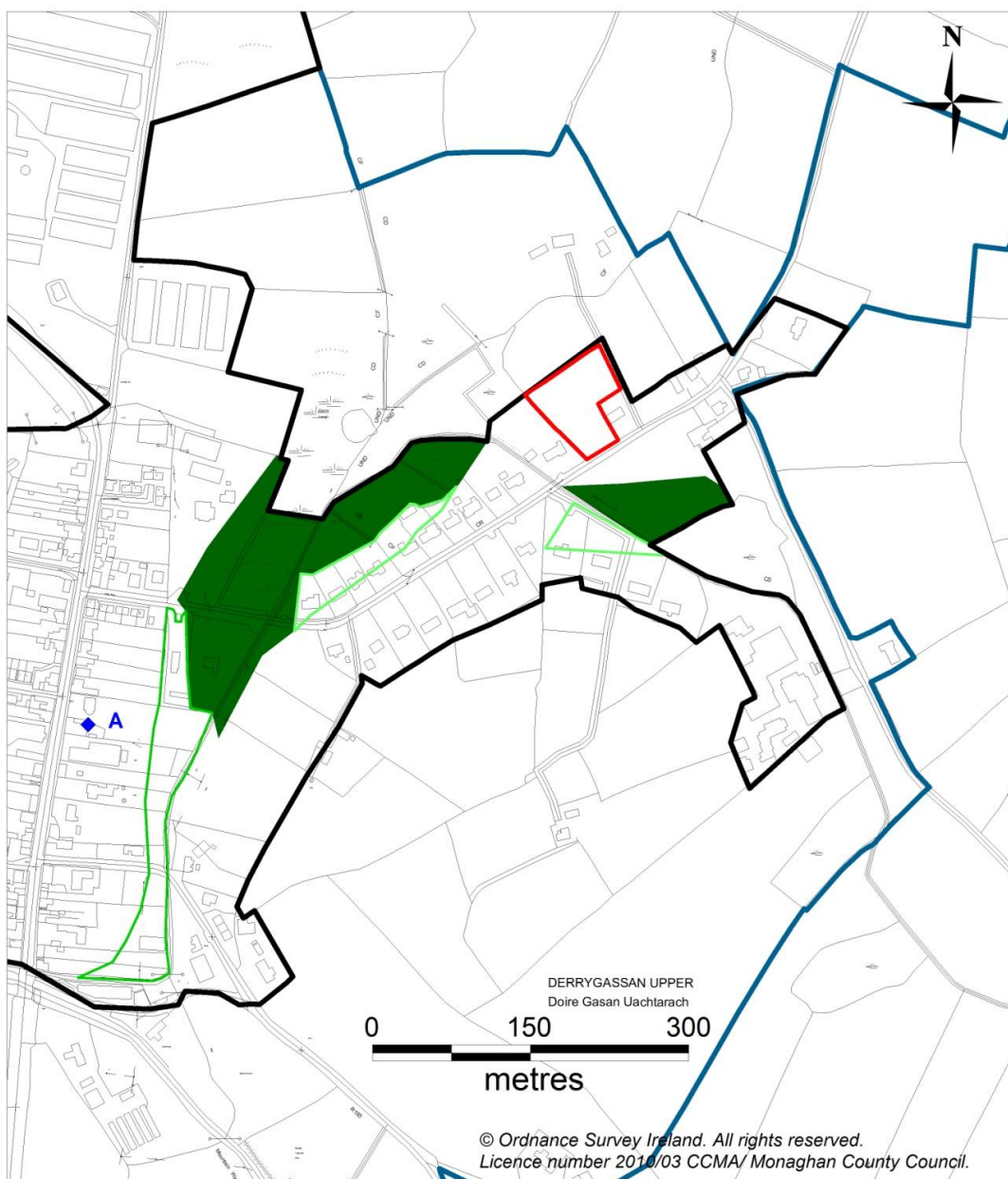
Response of the Manager

1. Noted.
2. Noted.
3. Noted.
4. The lands are not considered to be a greenfield site and it is accepted that they have been in use as part of the quarry operations at this location.
5. Due to the nature of the lands which are limited in width and adjacent to the quarry face, it is considered that they would not be conducive to use for Industry, Enterprise and Employment.
6. The exclusion of the lands from Industry, Enterprise and Employment zoning would not preclude the use of the access link.
7. As point 5 above.
8. As point 6 above.
9. **It is considered that there is a sufficient quantum of zoned Industry, Enterprise and Employment lands in the town. In addition, due to the nature of the lands which are limited in width and adjacent to the quarry face, it is considered that they would not be conducive to use for Industry, Enterprise and Employment. Therefore it is recommended that these lands are excluded from the settlement envelope and are not zoned as Industry, Enterprise and Employment.**
10. As point 6 above.
11. Noted.

5.63 Submission Ref: DMCDP63
 Person/Body: Patrick McKenna
 Location: Emy, Emyvale – see Map DMCDP63
 Core Issue: Zoning of Lands for Housing

Emyvale (Map DMCDP63)

Draft Monaghan County
 Development Plan 2013-2019



Development Constraints - EMYVALE

(A) Magee Meats (Protected Structure)

Points Raised

1. Outline planning permission for 15 no. of detached dwellings was granted under ref. 05/73 with permission consequent granted under 07/726, but no development has taken place.
2. The draft plan proposes to zone only half of these lands, however, Mr. McKenna is not interested in developing multiple units and wishes to develop a couple of units within the next five years.
3. The public sewerage, water, lighting and footpath are already in place to the front of the lands and the site constitutes an infill opportunity between existing residential development.
4. Mr. McKenna requests that the subject lands (outlined in red on Map MD CDP63) remain zoned as per the draft plan.

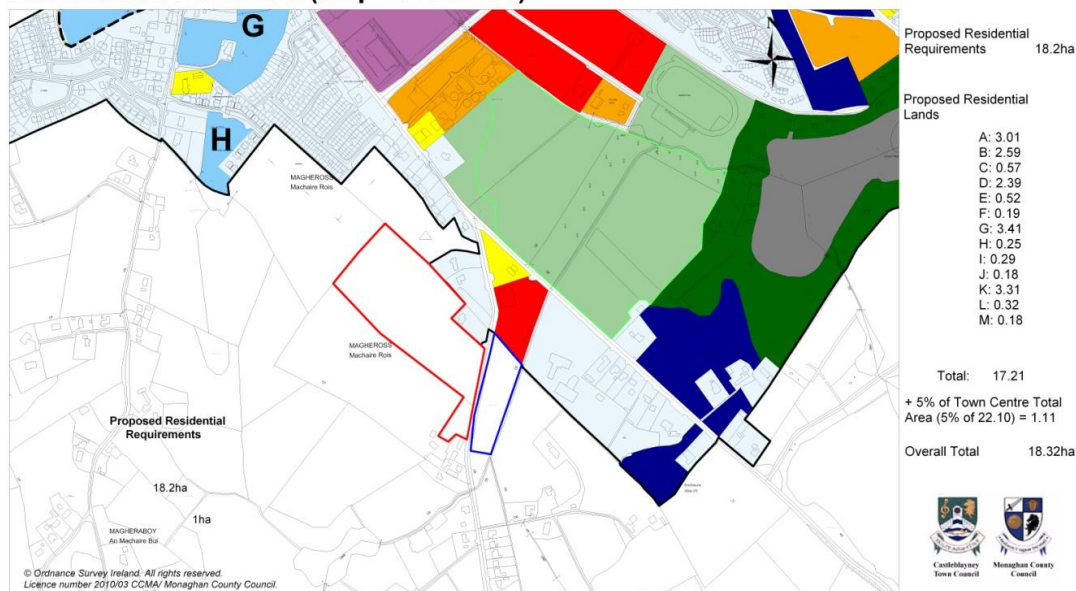
Response of the Manager

1. Noted.
2. Noted.
3. Noted.
4. **It is recommended that the subject lands (outlined in red on Map MD CDP63) remain included within the settlement limit of Emyvale.**

5.64 Submission Ref: DMCDP64
 Person/Body: Glassford Developments (B & C Contractors Ltd)
 Location: Carrickmacross - Refer to Map DMCDP64
 Core Issue: Rezoning of lands to Proposed Residential Lands and Strategic Residential Reserve.

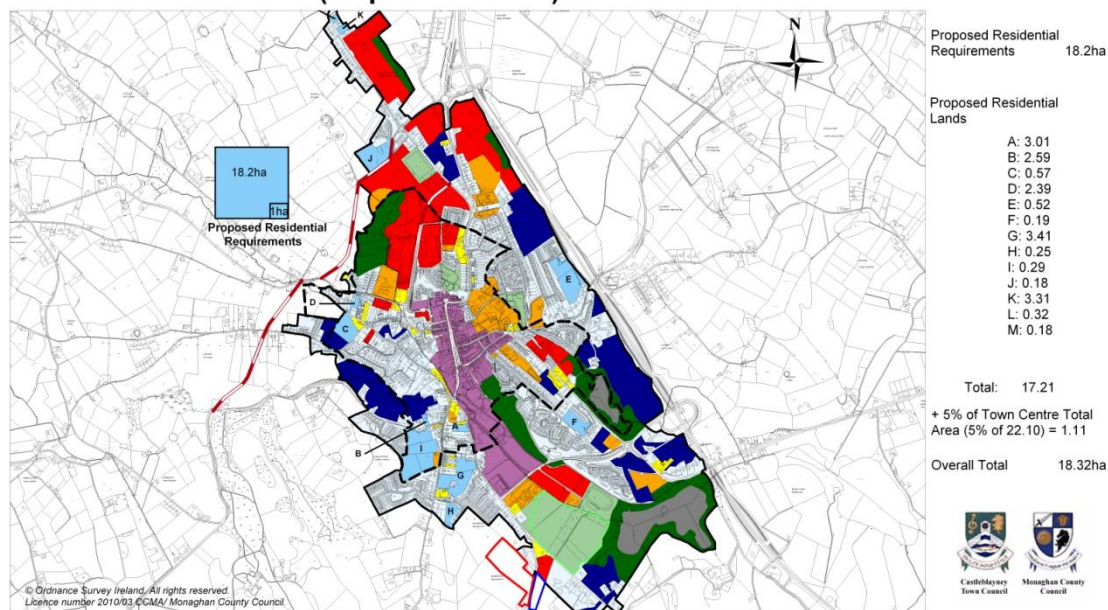
Carrickmacross Town (Map MDCDP64)

Draft Monaghan County Development Plan 2013-2019



Carrickmacross Town (Map MDCDP64b)

Draft Monaghan County Development Plan 2013-2019



Points Raised

1. A portion of the site outlined in red has the benefit of planning permission under reference 11/166 and should be included as “Proposed Residential Lands”.
2. The remaining parcel of land as outlined in red above should be rezoned to “Strategic Residential Reserve”.
3. The site outlined in blue should be rezoned as “Strategic Residential Reserve” in recognition of the proximity of the lands to the established and defined town centre and the existing built-up area.
4. Both sites should be included within the development limits of Carrickmacross for release within the lifetime of the 2013-2019 Development Plan in recognition of the sequentially favourable location and characteristics
5. A portion of the site outlined in red is subject to an extant planning permission for a residential development. It is illogical of the council to de-zone lands less than 6 months after issuing a grant of planning permission.
6. The lands are located circa 200m from the defined and established Town Centre boundary, they abut the existing built-up area and would form a natural extension to existing development.
7. The lands are fully serviceable, with a section of new foul sewer line running along the eastern edge of the Drumconrath Road. This sewer line was installed as part of the upgrade works to the Carrickmacross sewerage system.
8. There are no environmental constraints affecting either the submission lands themselves or surrounding lands.
9. The approach of the draft plan to dezone large blocks of serviced, sequentially favourable and committed lands is completely unjustifiable and contrary to current national planning guidance as expressed through the Department of the Environment Development Plan Guidelines for Planning Authorities (2007) and the Sustainable Residential Housing Guidelines (2008).
10. Planning permission exists on the site for 26 dwellings.
11. The lands are zoned, readily serviceable and located 200m from the established and defined town centre.
12. This part of the Town Centre contains the Carrickmacross Civic Offices and Library and a Lidl supermarket. Planning permission existing for a large shopping centre in the vicinity of the sites and a further application for a large foodstore is being considered by An Bord Pleanála.
13. The eastern boundary of the submission lands abuts the established residential development located on the western edge of Drumconrath Road.

14. The decision to dezone these lands is entirely at odds with the recommendations of the Development Plan Guidelines for Planning Authorities (2007) which promote a sequential approach to the zoning of land for residential purposes, The zoning of residential lands should extend outwards from the centre of an urban area, with undeveloped lands closest to the core and public transport routes being given preference, encouraging infill opportunities.
15. The Guidelines also stipulate that areas to be zoned should be contiguous to existing zoned development lands.
16. The lands display all the characteristics of a sequentially preferable site. The recent decision to grant planning permission confirms this is the case.
17. The zoning strategy proposed in the draft plan identifies two phases of development – “Proposed Residential Lands” and “Strategic Residential Reserve”. It is completely illogical for the subject lands to be excluded from the proposed land-use zoning phasing strategy having regard to their sequentially preferable location and characteristics.
18. The omission of the submission lands is even more illogical when compared to the location and characteristics of other “zoned” lands for example parcels J, K and L of the draft development plan which are all located in excess of 1km from the town centre, remote from services and amenities.
19. An area of lands to the south east of the subject site has been zoned “Strategic Residential Reserve” and adjoins a “Landscape Protection/Conservation” designation. These lands are located 0.5km from the town centre. In contrast the subject sites are located within 200 metres of the town centre and do not adjoin any environmentally sensitive lands.
20. A large tract of “Strategic Residential Reserve” lands are zoned in the eastern part of the town. These also adjoin a “Landscape Protection/Conservation” area and are located over 0.6km from the town centre.
21. The subject lands represent a more “sequentially” and environmentally preferable site than many of the proposed zoned lands. It is submitted therefore that the draft plan has ignored the potential and suitability of the subject lands.
22. The land use zoning strategy will stifle economic activity and have disastrous implications for job creation and employment opportunities in the Carrickmacross and Environs area.
23. The Core Strategy concept emerged over the past 36 months and since then there has been an unprecedented and dramatic downturn in economic circumstances. As formulated the concept is no longer “fit-for purpose” and the highly controlled and prescriptive approach is completely unjustified in present economic circumstances. A higher degree of flexibility is now required so that development is not stifled.

24. The intention of the Council to monitor and manage the supply of residential land to meet housing land as set out in Section 3.4.8 is welcomed. It appears that whilst considerable research was undertaken as part of the background work on the Carrickmacross Core Strategy, the strategy does not seem to include recognised international best practice methodologies and for this reason it is fundamentally flawed.
25. Housing Land Audit – the prescriptive approach adopted in the draft plan is unreasonable and unjustified. Maintaining an adequate supply of housing land in the current economic climate requires a flexible and realistic approach. The Core Strategy concept was developed over the last number of years and economic circumstances have deteriorated drastically since then.
26. A ‘Plan, Monitor, Review’ approach as used in the UK and Northern Ireland whereby an annual Housing Land Audit is carried out to identify and monitor supply of housing over the plan period should be adopted. An annual audit reflects the changing nature of housing markets and market conditions and ensures that forecasts for estimated housing completions over the plan period remain robust and realistic.
27. Annual Housing Land Audits are the established means for monitoring housing land in Scotland and the UK. Local Authorities in Scotland and the UK are encouraged to consult widely with the housing and building industry and infrastructure providers in the collation of the annual audit to enhance the accuracy of the data and thus its usefulness. They are encouraged to have contributions from local house builders and landowners regarding their sites included in the audit particularly in relation to whether or not the site is effective and the likely annual completion on that site. (Strategic Housing Land Availability Assessments – Practice Guidance (2007)).
28. It should be recognised that some of the potential for housing development in Carrickmacross might not be realised due to various constraints including the unwillingness of landowners to release their land for development. This crucial factor has not been included in the analysis of availability in the draft plan.
29. There has been no engagement with agents, developers or landowners.
30. In order that a land availability study does not result in stopping development, it must be based on annual monitoring and review.
31. Concept of ‘Effective Housing Land’ – The ‘Plan, Monitor, Review’ approach is based on the concept of ‘Effective Housing Land’ defined as “The part of the established housing land supply which is free or expected to be free of development constraints in the period under consideration, and will therefore be available for the construction of housing”. The concept of ‘effective housing land’ centres on the question of whether a site can be developed i.e. whether “residential units can be completed and available for occupation² in any particular year.

32. In the Scottish system for example in order for a site to be considered 'effective' it must be free from seven specific constraints:-
- Ownership
 - Physical
 - Contamination
 - Deficit funding
 - Marketability
 - Infrastructure
 - Land use
33. To determine the "effective housing supply" it is submitted that a detailed housing audit should have been undertaken that distinguishes effective i.e. unconstrained sites, from those that are affected by constraints. Effective supply cannot be established without detailed engagement with landowners and other relevant stakeholders,
34. The draft plan has not undertaken a full audit of all available housing sites taking into consideration the possible constraints to development in terms of planning policy, physical constraints and market constraints.
35. In the changed economic climate maintaining an effective supply of housing land that is unconstrained requires a flexible and realistic approach. The deliverability of sites needs to be considered.
36. The submission lands are accessible to amenities and services, fully services, partially committed and available for development.
37. Housing Tenure and Unit Type – background research at local level to determine house types and tenures area an important part of determining effective supply. This requires consultation with landowners, developers, market experts and other relevant stakeholders.
38. There does not appear to have been any direct engagement with stakeholders in the development industry in the preparation of the draft development plan. There need to be a higher level of engagement with landowners and developers before the adoption of the plan.
39. Failure to apply a structured methodology in the assessment of housing land requirements as set out above has resulted in overly restrictive land-use zoning provision in the Draft Plan. This has the potential to create monopoly situation removing choice and competitiveness with negative implications in terms of price, choice and location.
40. Prior to submission of planning reference 11/66, Glassford Developments Ltd engaged in extensive consultation both with the planning authority and local stakeholders to establish both market needs and requirements before finalising the design. The efforts of the applicant has resulted in a high quality and highly sustainable residential development

that adheres to current and emerging best practice guidance on energy efficiency and sustainable building.

41. The zoning provision of the draft plan will affect the ability to amend the existing planning permission based on the proposed de-zoning of the “committed” portion of the lands. Lands with planning permission have been effectively released for the purposes of housing supply and there is no control over the ability of these lands to release units throughout the plan period.
42. It is submitted that the draft plan should not affect any amendments to the planning permission granted to allow for flexibility and changing market conditions. Many permissions will be altered as landowners and developers seek to produce dwellings suited to present day markets.
43. It is illogical of the Council to de-zone lands less than 6 months after issuing a grant of planning permission.
44. The lands are located 200 metres from the defined and established town centre boundary and the existing built-up area and would form a natural extension to existing development.
45. The subject lands are geographically closer to the town centre.
46. The lands are fully serviceable.
47. There are no environmental constraints in contrast to other proposed “zoned” lands.
48. The lands display all the characteristics of a sequentially preferable site in accordance with Ministerial guidance.
49. The approach in the draft plan to de-zone parcels of serviced, sequentially favourable and committed lands is unjustified and contrary to national planning guidance and will hamper an effective supply of housing land in the medium to long term.

Response of the Manager

1. The Planning and Development Act 2010 required the inclusion of a Core Strategy within development plans, which dictates that lands should be zoned for residential development based on demand and sequential location. The Core Strategy incorporated within the draft County Development Plan has determined the quantum and location of residential lands required during the period of the development based on projected population growth and the sequential approach to land use zoning as stipulated in the Department of Environment, Community and Local Government Guidance Note on Core Strategies, the Development Plan Guidelines and the Sustainable Residential Development in Urban Areas Guidelines published by the Department, and Chapter Five of the National Spatial Strategy. It is considered that the provision of zoned residential land at this location on the periphery of Carrickmacross, and in excess of the plots of land identified as suitable for residential zoning due to their location, would be contrary to the provisions of the Planning

and Development (Amendment) Act 2010, the Development Plan Guidelines for Planning Authorities published by the Department of Environment Heritage and Local Government (DEHLG), and the Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities published by DEHLG. The lands are removed from the footprint of the settlement and would represent an encroachment into the open countryside which would be against the sustainable principle of maintaining compact urban forms. In addition, there are a significant number of plots of land proposed to be zoned for either Proposed Residential or Strategic Residential Reserve designated within the existing footprint of Carrickmacross which are undeveloped.

2. As point 1 above.
3. As point 1 above.
4. As point 1 above.
5. Planning permission was granted on the lands on the basis of the zonings in the Monaghan County Development Plan 2007-2013 and prior to the adoption of the variation to incorporate a Core Strategy. The lands are removed from the existing built footprint of the settlement and would represent an encroachment into the open countryside which would be against the sustainable principle of maintaining compact urban forms. It is considered that the provision of zoned residential land at this location on the periphery of Carrickmacross, and in excess of the quantum of land identified as suitable for residential zoning due to their location, would be contrary to the provisions of the Planning and Development (Amendment) Act 2010, the Development Plan Guidelines for Planning Authorities published by the Department of Environment Heritage and Local Government (DEHLG), and the Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities published by DEHLG.
6. One of the key elements of sustainable development and of the Core Strategy is compact urban form. The extension of the settlement envelope to include the subject lands would not be in keeping with this principle as there is a significant quantum of lands that are suitable for residential development, within the existing footprint of the town, closer to the centre of the town. It is considered that this form of development constitutes urban sprawl as it seeks to extend the footprint of the settlement rather than consolidate it. The zoning of these lands is not compatible with the sustainable principle of maintaining compact urban forms. In addition, there are a significant number of plots of land proposed to be zoned for either Proposed Residential or Strategic Residential Reserve designated within the existing footprint of Carrickmacross which are undeveloped.
7. Noted.
8. Noted.

9. The Planning and Development (Amendment) Act 2010 reinforces the principles of proper planning and sustainable development with the requirement to incorporate a Core Strategy into development plans. This Core Strategy ensures that residential land is commensurate with population growth and that the zoning of lands for residential development takes place in a sequential manner. There are a significant number of plots of land proposed to be zoned for either Proposed Residential or Strategic Residential Reserve designated within the existing footprint of Carrickmacross which are undeveloped and closer to the centre of the settlement.
10. Noted.
11. Noted.
12. Noted.
13. Noted.
14. As point 1 above.
15. As point 1 above.
16. As point 5 above.
17. As point 1 above.
18. The Draft Monaghan County Development Plan 2013-2019 seeks to consolidate the existing footprint of the built urban area, and lands have been zoned for residential use with the aim of consolidating the settlement, and encouraging the development of vacant infill plots within the urban footprint. Plot J constitutes part of an already commenced housing development, and plots K and L are infill opportunities, the development of which will consolidate the settlement.
19. As point 1 above.
20. The lands zoned as Strategic Residential Reserve on the eastern part of the settlement are located between the By pass and the built up area of the town. Given that these lands are considered 'landlocked' between development and the N2, they represent an infill opportunity and thus it is appropriate that these lands would be zoned suitable for residential use at some time beyond the lifetime of the plan. The zoning of these lands would not be considered as urban sprawl, given that the N2 By pass could be considered as the delineation between the settlement and the countryside at this part of Carrickmacross.
21. As point 9 above.
22. Section 10(1B) of the Planning and Development Act 2010 requires all planning authorities to include a Core Strategy within its development plan. The Core Strategy incorporated within the draft County Development Plan has determined the quantum and location of residential lands required during the period of the development based on projected population growth and the sequential approach to land use zoning as stipulated

in the Department of Environment, Community and Local Government Guidance Note on Core Strategies, the Development Plan Guidelines and the Sustainable Residential Development in Urban Areas Guidelines published by the Department, and Chapter Five of the National Spatial Strategy. The Development Plan Guidelines published by the Department of Environment, Heritage and Local Government and the Border Regional Planning Guidelines permit the zoning of up to 150 percent of the identified required residential lands for the period of the development plan. This ensures that there will be sufficient supply of residential lands that do not have barriers to development.

23. Noted, however there has been no change in legislation or Departmental Guidelines to direct the planning authority to any alternative approach.
24. It is considered that the provisions within Section 3.4.8 of the draft development plan establishes a Monitoring and Implementation programme that is most appropriate for County Monaghan, particularly as 150 percent of the quantum of residential land required for projected population growth in settlements over the period of the development plan has been zoned to take account of any difficulties there may be in developing some of these lands.
25. A Housing Land Availability Study is undertaken by the Planning Authority on an annual basis and the uptake/development of residential land during the lifetime of the development plan will be monitored as part of this process. In the event that the quantum of Proposed Residential land falls to a level that could stifle growth and development of the settlement, a variation can be made to the development plan to include additional Proposed Residential land if necessary.
26. As point 25 above.
27. Noted.
28. The Development Plan Guidelines published by the Department of Environment, Heritage and Local Government and the Border Regional Planning Guidelines permit the zoning of up to 150 percent of the identified residential lands requirement for the period of the development plan. This ensures that there will be sufficient supply of residential lands that do not have barriers to development. Having established the appropriate quantum of zoned residential land, the local authority considers that those lands identified for residential development are able to avail of existing infrastructure or that proposed for which funding has been committed to.
29. Section 11(2)(bc) of the Planning and Development Act 2010 precludes the Planning Authority from considering proposals for zoning of particular lands prior to the publication of the draft plan.
30. As point 25 above.
31. Noted.

32. Noted.
33. As point 25 above.
34. As point 28 above.
35. As point 28 above.
36. Noted.
37. Noted.
38. As point 29 above.
39. The Planning and Development Act 2010 required the inclusion of a Core Strategy within development plans, which dictates that lands should be zoned for residential development based on demand and sequential location. The Core Strategy incorporated within the draft County Development Plan has determined the quantum and location of residential lands required during the period of the development based on projected population growth and the sequential approach to land use zoning as stipulated in the Department of Environment, Community and Local Government Guidance Note on Core Strategies, the Development Plan Guidelines and the Sustainable Residential Development in Urban Areas Guidelines published by the Department, and Chapter Five of the National Spatial Strategy. 150 percent of the quantum of residential land required for projected population growth in settlements over the period of the development plan has been zoned to take account of any difficulties there may be in developing some of these lands. A number of parcels of land have been identified suitable for residential at various locations through Carrickmacross.
40. Noted.
41. As point 5 above.
42. Given that there is an extant permission on the site, it is considered that an application for change of house type would not be adversely affected by the zonings of the development plan, provide that there is no increase in the number of dwellings.
43. As point 5 above.
44. Section 4.19 of the DEHLG Development Plan Guidelines clearly states that a logical sequential approach should be taken to the zoning of land, where zoning should extend outwards from the centre of an urban area, where emphasis should be placed on infill opportunities and better use of under utilised lands, and where areas to be zoned should be contiguous to existing zoned development land. The Guidelines further state that only in exceptional circumstances should these principles be contravened and any exceptions must be clearly justified by local circumstances and such justification must be set out in the written statement of the development plan. It is considered that the provision of zoned residential land at this location on the periphery of Carrickmacross, and in excess of the plots of land identified as suitable for residential zoning due to their location, would be

contrary to the provisions of the Planning and Development (Amendment) Act 2010, the Development Plan Guidelines for Planning Authorities published by the Department of Environment Heritage and Local Government (DEHLG), and the Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities published by DEHLG. The lands are removed from the footprint of the settlement and would represent an encroachment into the open countryside which would be against the sustainable principle of maintaining compact urban forms. **For these reasons and the reasons outlined in points 1, 9, 18, 20, 28, 42, it is recommended that the subject lands be excluded from the settlement envelope of Carrickmacross and are not zoned either Proposed Residential or Strategic Residential Reserve.**

- 45. As point 44 above.
- 46. Noted.
- 47. Noted.
- 48. As point 44 above.
- 49. As point 6 above.

5.65 Submission Ref: DMCDP65
Person/Body: Gordon McKenna
Location: N/A
Core Issue: Ribbon Development

Points Raised

1. Mr. McKenna has lived at his address for almost thirty years, helps run the family farm and has a agricultural contracting business.
2. Mr. McKenna purchased land across the road from the farm to increase the viability of the farm business and to obtain a site for a dwelling for his family.
3. Mr. McKenna applied for two dwellings on the lands in 1999 to enable him to finance the construction of his dwelling by selling the second site, but both were refused.
4. In 2009 and in 2011 applications were made for one dwelling on the lands, but was also refused on the grounds of ribbon development and other sites existed on the family landholding.
5. Mr. McKenna is renting a house at present and wants to build a home for his family on the lands.
6. If the policy on ribbon development was relaxed, all other planning difficulties could be overcome.
7. The wording “where no other suitable site is available on the entire landholding (family homestead)” and “In assessing a planning application, the Planning Authority will consider all lands within the ownership of the applicant and/or their immediate family. A dwelling will only be granted where there are no alternatives available.” from Policy RDP18.
8. Mr. McKenna is a landowner of more than four hectares who has lived in the area for more than five years, and it is not reasonable to expect a landowner to go back to the family homestead when they already own land, and when alternative sites may be committed to other family members.
9. Mr. McKenna has a housing need, meet a number of the policies on page 41 of the current development plan, and the site is not speculative.
10. A landowner with a minimum landholding of four hectares should be permitted to build a home on their land subject to an occupancy condition and compliance with all other policies within the development plan.

Response of the Manager

1. Noted.
2. Noted.
3. Noted.

4. Noted.
5. Noted.
6. Noted.
7. **It is recommended that Policy RDP18 be amended to state “A relaxation of ribbon development policy on regional and local roads will be considered where planning permission is sought on the grounds of meeting the housing needs of a landowner,¹⁵ or a member of his/her immediate family¹⁶ where no other suitable site is available on the entire landholding ~~(family homestead)~~,¹⁷ The Planning Authority will apply an occupancy condition for a period of 7 years in such cases.**

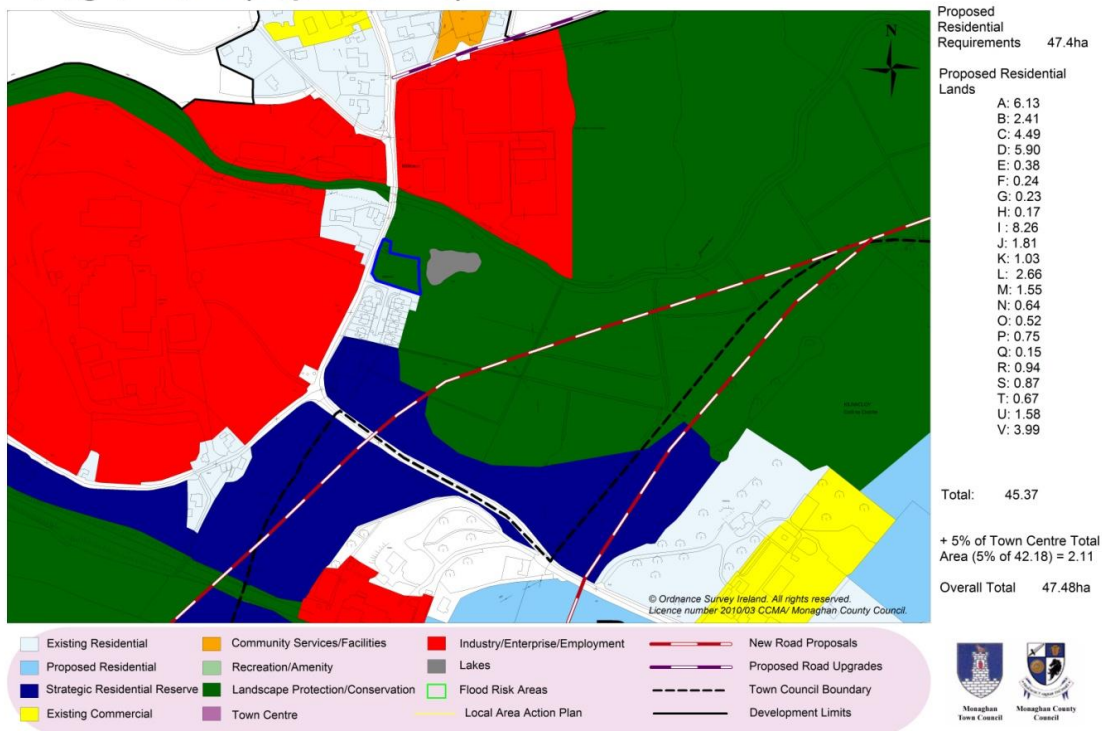
It is also recommended to amend foot note 17 to state “No other suitable site is available on the landholding – In assessing a planning application, the Planning Authority will consider all lands within the ownership of the applicant ~~and/or their immediate family~~. A dwelling will only be granted where there are no alternatives available.”

8. Noted.
9. Noted.
10. Noted.

5.66 Submission Ref: DMCDP66
 Person/Body: Kavanagh Fennell Receivers
 Location: Milltown, Monaghan - Refer to Map DMCDP66
 Core Issue: Exclusion of lands from Landscape Protection/Conservation

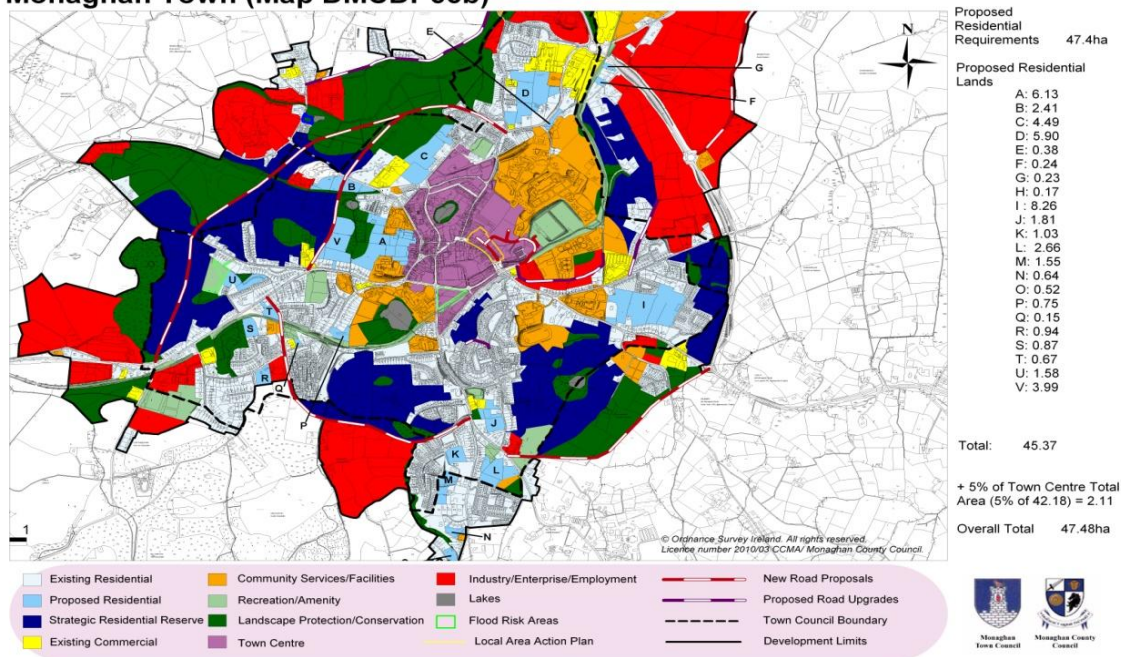
Monaghan Town (Map DMCDP66)

Draft Monaghan County Development Plan 2013-2019



Monaghan Town (Map DMCDP66b)

Draft Monaghan County Development Plan 2013-2019



Points Raised

1. Purpose of the submission is to ensure that the plot of land (outlined in blue above) is not included in any map zoning areas susceptible to flooding within the draft development plan.
2. The lands are located to the south of the River Blackwater, and a lagoon situated to the east of the property, which is adjacent to the rear boundary of the site. The site abuts the public road and there is an existing dwelling house on the site.
3. FJ Coyle and Associates have recently completed the As-Constructed survey of Millbrook housing estate. Levels taken along the front of the lands in question range from 59.74m adjacent to the entrance to Millbrook to 58.65m at the existing dwelling house. The road then continues to fall towards the river.
4. The lands themselves slope down from the public road (59.63m) to the back of the site (54.00m approx.). The water level of the lagoon would be a further meter lower than the surrounding lands, at a level of 53.00m approx.
5. It is proposed that the first 35m of the site from the eastern boundary would be suitable for the development of either a one off house, or a block of 2 semi-detached houses due to the elevated nature of that section of site. The floor levels of any development would be similar to that of the front row of the existing Millbrook estate, if not slightly higher. Any development would be subject to the appropriate statutory approvals.
6. The elevated nature of the site does not warrant its inclusion in an area that is zoned to be at risk of flooding. The site in question is adjacent to low lying lands, but there are no recorded flood events listed on the Office of Public Works website for these lands.
7. There is a large low lying area to the east of these lands (elevation approx 54.00 AOD) which provides significant capacity to accommodate a serious flood event.
8. Any proposed development on this site would be at an elevation of 58.00m or thereabouts, which would follow the natural contours of the site and be sufficiently higher than any potential flood waters.
9. Submission wishes the County Council to exclude these lands from any map zoning areas susceptible to flooding.

Response of the Manager

1. Noted.
2. Noted.
3. Noted.
4. Noted.
5. Given the requirement of the Planning and Development (Amendment) Act 2010 and the Development Plan Guidelines to ensure development takes in a sequential manner

from the core of the settlement out wards, and the fact that there a significant number of plots of land closer to the core of the settlement that are suitable for housing, and capable of providing more than the required number of houses during the lifetime of the development plan, it is recommended that the subject lands are not zoned for either Strategic Residential Reserve or Proposed Residential use. In addition, as the lands are adjacent to the River Blackwater which is a Secondary Amenity Area, they should remain as Landscape Protection/Conservation.

6. A Strategic Flood Risk Assessment is currently being prepared for County Monaghan. Preliminary information obtained from historic flood maps, information from the Office of Public Works, contour mapping and LIDAR information, site inspections, and assessment by County Council engineers indicates that the lands are at risk of flooding or their development could cause flooding elsewhere. The principles set out in the Department of Environment, Heritage and Local Government Guidelines “The Planning System and Flood Risk Management (2009)” require the adoption of a precautionary approach being applied to such lands which either are currently at risk of flooding, could be at risk of flooding in the future, or could cause flooding elsewhere if developed.
7. The completed Strategic Flood Risk Assessment will be factored into the statutory two year review of the development plan in 2015 and any necessary changes to the development plan will be progressed by way of variation.
8. As point 6 above.
9. As point 6 above.
- 10. For the reasons set out in points 5, 6 and 7 above, it is recommended that the subject lands remain zoned as Landscape Protection/Conservation.**

5.67	Submission Ref:	DMCDP67
	Person/Body:	Irish Farmers' Association (IFA)
	Location:	N/A
	Core Issue:	Legal Agreements for Visibility Splays

Points Raised

1. Welcomes the opportunity to comment on the draft plan and comments are confined to Section 15.23 of the draft plan.
2. Under the Roads Act 1993 owners and occupiers of land along public roads are obliged to ensure roadside hedgerows and trees do not present a hazard or obstruction to road users, and local authorities can pursue compliance of this legal requirement.
3. Section 15.23 states "*Planning applications involving third party land must be accompanied by a written legal agreement between all parties.*" In addition to this the planning authority is seeking to require a burden be placed on the title of the affected third party lands which exceeds the requirements of the development plan and is extremely difficult and problematic to achieve.
4. This requirement is preventing the construction of dwellings and the IFA requests that this requirement be withdrawn.
5. Full consideration should be given to the existing obligations on landowners under the Roads Act 1993.

Response of the Manager

1. Noted.
2. Noted.
3. Noted.
4. **It is essential in the interests of road safety that visibility splays are provided and maintained, and also that are constructing new developments have sufficient entitlement to provide and maintain these visibility splays over third party lands in perpetuity. Legal agreements that are accompanied by easements attached to the affected third party title are considered to be the only effective method of providing certainty in this regard. This position is informed by a legal opinion provided to the Council by its solicitors.**
5. As point 4 above

5.68 Submission Ref: DMCDP68
Person/Body: Mr. Patrick Kerrigan
Location: Bawn
Core Issue: Bawn as a Tier 6 Settlement

Points Raised

1. Mr. Kerrigan is dismayed at the inclusion of Bawn as a Tier 6 settlement.
2. There are numerous unfinished housing developments across the county, many of which are located in convenient urban areas with easy access to multiple amenities and Monaghan County Council are proposing to add to this unwanted housing surplus by developing further dwellings in a rural area where the only amenities are a church and a handball alley.
3. Local people will not be attracted to any new developments.
4. Social housing developments are not the key to ensuring a vibrant community.
5. Mr. Kerrigan queries as to why Monaghan County Council are not filling the already vacant social housing in Shercock before starting further developments.
6. Petitions which have been submitted against such schemes have been signed by the majority of people who live and work in the area. The only people who are in favour of such schemes are a group known as The Bawn Housing and Community Association.
7. Mr. Kerrigan indicates that the existing social housing in Bawn have weathered badly and queries whether Monaghan County Council will maintain them to a good standard or leave it to become a dilapidated estate.

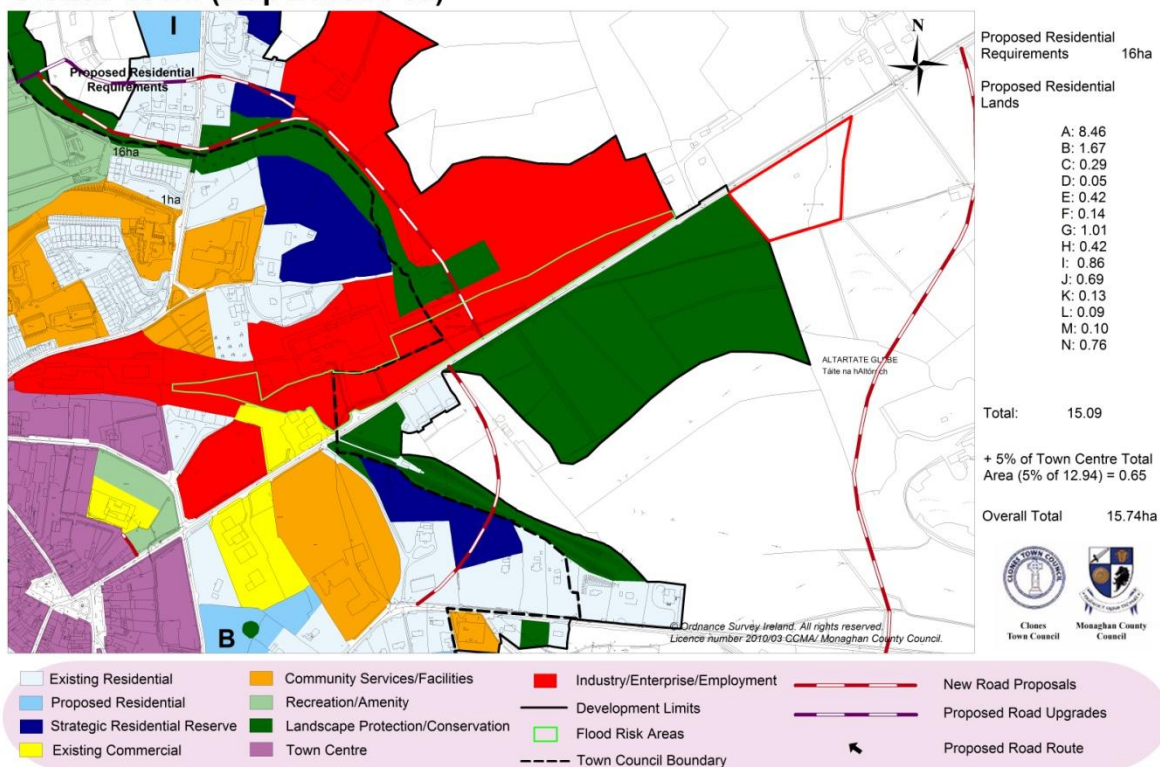
Response of the Manager

1. Noted.
2. Monaghan County Council recognises that there are a number of vacant and unfinished residential developments in the county. Notwithstanding this, there is uncertainty as to whether or not these developments will be completed and/or when they will be available for occupation.
3. Noted.
4. Noted.
5. The vacant social housing located within Shercock fall within the jurisdiction of Cavan County Council.
6. Noted.
7. This issue falls outside the remit of the development plan.

5.69 Submission Ref: DMCDP69
 Person/Body: Enda Graham
 Location: Clones - Refer to Map DMCDP69
 Core Issue: Zoning of Lands for Industry, Enterprise and Employment

Clones Town (Map DMCDP69)

Draft Monaghan County Development Plan 2013-2019



Points Raised

1. It is requested that the subject lands (outlined in red on Map DMCDP69) be zoned for Industry/Enterprise/Employment.
2. The lands are within the 100kph speed limit and would lend themselves for the easy transportation of goods.

Response of the Manager

1. Approximately 35 hectares of land has been zoned for Industry, Enterprise and Employment in the Draft Town Plan for Clones and this is considered sufficient to accommodate the anticipated level of industrial and enterprise development in the town during the life of the plan. Section 4.19 of the DEHLG Development Plan Guidelines clearly states that a logical sequential approach should be taken to the zoning of land, where zoning should extend outwards from the centre of an urban area, where emphasis should be placed on infill opportunities and better use of under utilised lands, and where

areas to be zoned should be contiguous to existing zoned development land. The Guidelines further state that only in exceptional circumstances should these principles be contravened and any exceptions must be clearly justified by local circumstances and such justification must be set out in the written statement of the development plan.

In addition, preliminary information obtained from historic flood maps, information from the Office of Public Works, contour mapping and LIDAR information, site inspections, and assessment by County Council engineers indicates that the lands are at risk of flooding or their development could cause flooding elsewhere. The principles set out in the Department of Environment, Heritage and Local Government Guidelines "The Planning System and Flood Risk Management (2009)" require the adoption of a precautionary approach being applied to such lands which either are currently at risk of flooding or could be at risk of flooding in the future, or could cause flooding elsewhere if developed.

2. Section 2.5 of the DECLG publication "Spatial Planning and National Roads Guidelines for Planning Authorities" advises that the policy of the planning authority will be to avoid the creation of any additional access or the generation of additional traffic from existing accesses onto national roads where the speed limit is greater than 60kph. **Therefore for this reason and the reasons set out in point 1 above, it is recommended that the lands do not be zoned Industry, Enterprise and Employment.**

5.70	Submission Ref:	DMCDP70
	Person/Body:	An Taisce
	Location:	N/A
	Core Issue:	General

Points Raised

1. Given the optimistic nature of the Regional Planning Guidelines population targets the use of 50% headroom for zoning allocations is inappropriate. In advance of the DoEHLG reviewing these population targets, a more targeted approach would be more appropriate with a specific recognition that zoned land will only be released in accordance with the sequential approach and where infrastructure and services are fully available.
2. There remains a huge legacy of inappropriate zoning which needs to be removed from the draft development plan. In these circumstances a much more radical and focused approach is required.
3. A total of 4,764 (56%) of population growth is allocated to un-zoned unserviced rural areas. This allocation will be detrimental to the achievement of all of the other policy objectives of the draft development plan e.g. Smarter Travel, compact settlement, etc, as due 'one-off' housing development is likely to be the prominent form of new housing demand for the foreseeable future to financial constraints.
4. The planning authority must ensure that proactive measures are included in the draft development plan to promote nucleation and protect rural areas from a proliferation of car-dependent dispersed urban generated settlement.
5. Ireland's rural areas will be a critical resource within the new energy constrained era and the prudent protection and sustainable exploitation of natural resources for agriculture, forestry and renewable energy will be key.
6. The recommendations of the EPA document "Sustainable Rural Development-Managing Housing in the Countryside", 2010 should be incorporated into the draft development plan.
7. Submission refers to the recent Forfas Statement on Energy which states "Ireland has opted for a policy of land-use planning which has resulted in the sprawl of low-density housing developments. This approach, while socially popular, is not sustainable from an energy, environmental, climate change or quality of life perspective".
8. The only sustainable form of rural housing development is the village/small town cluster which allows for the efficient delivery of services and infrastructure, enhances social capital, provides a compact walkable communities and the protection of the natural environment.

9. With 410,000 one off houses in Ireland and with a highly inequitable method of allocation together with major competing legal water quality obligations, serious consideration must be given to a moratorium on a net increase in urban-generated one off housing units.
10. Limerick County Council has issued a policy statement on promoting nucleated settlements and serviced sites in villages. The planning authority should adopt a similar approach in finalising the draft development plan by promoting the revitalisation of rural villages. This will require the proactive use of integrated fiscal, CPO and planning powers.
11. An Taisce questions the zoning of a significant area of land at Bawn.
12. Bawn is a greenfield, unserviced rural area with only a church and a pub adjacent to Lough Bawn Demesne.
13. The draft plan must be issued to the Regional Authority for vetting and we would welcome views of the regional authority as to whether this proposed zoning accords with national and regional policy.
14. There is limited specific recognition in the draft development plan of energy price inflation particularly oil price inflating.
15. Recent projections by the IMF and IEA suggest a near doubling of oil prices over the next decade.
16. The planning authority will be aware that the Planning and Development (Amendment) Act 2010 makes specific reference to reducing energy demand in response to the likelihood of increases in energy and other costs due to long-term decline in non-renewable resources.
17. The draft development plan should make an explicit reference to likely future trends in oil price inflation with reference to contemporary authoritative research reports, such as the IEA and IMF.
18. This is an issue which is directly germane to spatial planning as local-land use plans can play a key role in fostering greater local resilience in the face of rising global energy prices. This will include positive community led 'bottom up' approaches such as, for example, the Kinsale Energy Descent Plan which aims to promote a relocalisation and revitalisation of the local economy.
19. There should be a greater weight placed in the draft development plan on adaption to the effects of climate change.
20. Submission supports the recognition in the draft plan of the role that a holistic Green Infrastructure approach can play in delivering on an adaption strategy providing an ecosystem based strategy for flood management, biodiversity enhancement, recreation, forestry and Green House Gas mitigation. However greater emphasis should be placed on the vitally important issue of Climate Change adaption.

21. The planning authority should review the Department of Environment, Community and Local Government's Draft Local Area Plan Guidelines for Planning Authorities, which includes many prescient policy measures including the 'Sustainability Tool Kit'. The 'Sustainability Tool kit approach should be a mandatory requirement in the assessment of all planning applications for development.
22. The implementation measures included within the draft plan are weak. It is of paramount importance that the planning authority moves beyond policy objectives and towards robust targets, actions and measures to achieve the tangible implementation and a transition to a low-carbon, low-energy and sustainable society.
23. There are two ways in which the effective implementation of the sustainable objective targets can be achieved, Targets and Monitoring, and the Sustainability Matrix.
24. Section 15 of the Planning and Development Act 2000 imposes a duty on the planning authority to secure the objectives of a development plan and requires that not more than two years after the making of a development plan the Manager must provide a report on the progress achieved.
25. Section 6 of the Development Plan Guidelines for Planning Authorities 2007 set out guidance as to how the implementation of the policies and objectives of a development plan can be achieved. The Guidelines state that policies and objectives must be capable of implementation and that it must be possible to monitor and evaluate the effectiveness or otherwise of achieving stated aims.
26. Monitoring involves the collation and analysis of performance data which must be linked to an evaluation process so that effectiveness can be measured against stated criteria.
27. It is not possible to monitor the effectiveness of the policies and objectives of the development plan without the inclusion of quantifiable targets. Many best-practice statutory land use plans include implementation measures. A sample schedule of Targets, Indicators and Monitoring Measures is included within Appendix 1 of the submission. It is recommended that a similar schedule be included within the development plan. Monitoring measures are required by the SEA Directive and in many cases these are directly transferable to the draft plan.
28. The draft development plan must include a detailed implementation and monitoring schedule which outlines the manner in which the draft development plan envisages the future development of the area with particular focus on the phased and sequential development of the locality.
29. A designated implementation officer must be appointed to oversee the implementation of the draft development plan and ensure joined up thinking between development management, forward planning, environment service, infrastructure etc.

30. A sustainability matrix should be included within the draft development plan which sets out the range of sustainability criteria which should be intrinsic to all planning applications for development. This would act as both a guide to prospective applicants and planning authority staff in distilling the core sustainability community and social infrastructure requirements of the development plan into a schedule of convenient assessment criteria.
31. The planning authority should include a requirement for all development proposals to be required to submit a Sustainability Statement with all planning applications. Submission refers to a matrix included within the Clonburris Strategic Development Zone strategy prepared by South Dublin County Council.
32. The usefulness of this approach has been recognised in the recently published LAP Guidelines for Planning Authorities.
33. Spatial planning is amongst the most important function of the planning authority and its elected members. Reference is made to the Judgement of the High Court in respect of Farrell and Forde v Limerick County Council (2008 No. 1398 J.R.).
34. Submission requests that the Manager and Elected Members have full regard to their legal obligations in the consideration of the draft development plan.
35. A key priority of the draft development plan must be transition to a low-carbon society and economy and to mitigate the significant risks associated with rising energy costs and climate change adaptation.
36. The international and national economic recession has provided a narrow window of opportunity to take action to concentrate investment and focus policy on the transition to a post-oil low-carbon locally resilient society.
37. The statutory planning system, through the regulation of physical development and land use has the most critical role to play in facilitating this transition.
38. The success or otherwise of the forthcoming development plan can only be judged against verifiable and implementable criteria which are subject to ongoing monitoring.

Response of the Manager

1. The proposed zoning provides for 50% additional zoning to ensure a properly functioning market for housing land. This has been undertaken in accordance with policy CSP6 of the Border Regional Planning Guidelines which state that in assessing and deciding on land use zoning objectives for all settlements the excess in zoned land should normally lie between 50% and 100% of the land requirement based solely on population targets. Portions of land suitable for residential development have been identified in each of the five towns as a result of their sequential location, adjoining land use, accessibility and/or existing infrastructure. It is an objective of the planning authority to ensure that all new residential areas are adequately serviced by local facilities and services.

2. The principles of Proper Planning and Sustainable Development are cornerstones of the Planning and Development Act 2000. The Planning and Development (Amendment) Act 2010 further reinforces this approach with the requirement to incorporate a Core Strategy within every development plan which ensures that zoned residential land is commensurate with population growth. The Settlement/Core Strategy contained within Chapter Three of the draft Development Plan is based on population targets set out in the Regional Planning Guidelines with a view to expanding Monaghan Town as a 'Hub' and ensuring there is sufficient lands to accommodate population growth in the remainder of the county. It is considered that the Settlement/Core Strategy provides a more focused approach to the zoning of land which ensures the quantum of residential lands is commensurate with population growth. The Settlement/Core Strategy is based on the following principal requirements:
 - The promotion and development of Monaghan as a Hub Town and as the main residential, retail, service and employment centre in the county.
 - The development of second and third tier towns as residential, retail, service and employment centres.
 - Controlled expansion of fourth tier settlements as residential and local retail centres
 - Careful growth management in 'rural areas under strong urban influence'
 - Sustainable development of Tier 5 and 6 settlements and the remaining rural areas.
3. County Monaghan has a traditional pattern of dispersed settlement in rural areas together with network of towns and villages distributed throughout the county.
4. In accordance with the Department of Environment, Heritage and Local Government's Sustainable Rural Housing Guidelines for Planning Authorities and to ensure that development in the countryside outside the planned limits of the settlements takes place in a sustainable manner which reflects the needs of the rural communities, County Monaghan has been divided into three development management zones. Those areas where the greatest pressure from urban generated rural housing have been identified, and policies restricting development to rural generated housing in these areas have been put in place. A significant number of settlements from large towns to small rural focal points are evenly distributed across the county to offer alternatives to one off rural housing. In addition TRO4 states that it is an objective of the local authorities to promote high quality, flexible and responsive local transport services in urban and rural communities".
5. Noted. The draft development plan contains objectives and policies which recognise the importance of agriculture, forestry and renewable energy.

6. The recommendations of the EPA document “Sustainable Rural Development - Managing Housing in the Countryside”, 2010 have been taken into account when preparing the draft development plan.
7. Noted.
8. The Settlement/Core Strategy in Chapter Three of the draft plan provides a hierarchy of settlements, which caters for balanced and sustainable growth of the County. The settlement hierarchy proposed is based on the function of each settlement, together with the existing and anticipated levels of development and service provision. A significant number of settlements from large towns to small rural focal points are evenly distributed across the county to offer alternatives to one off rural housing.
9. In accordance with the Department of Environment, Heritage and Local Government’s Sustainable Rural Housing Guidelines for Planning Authorities and to ensure that development in the countryside outside the planned limits of the settlements takes place in a sustainable manner which reflects the needs of the rural communities, County Monaghan has been divided into three development management zones. Those areas where the greatest pressure from urban generated rural housing have been identified, and policies restricting development to rural generated housing in these areas have been put in place.
10. In accordance with the Department of Environment, Heritage and Local Government’s Sustainable Rural Housing Guidelines for Planning Authorities and to ensure that development in the countryside outside the planned limits of the settlements takes place in a sustainable manner which reflects the needs of the rural communities, County Monaghan has been divided into three development management zones. Those areas where the greatest pressure from urban generated rural housing have been identified, and policies restricting development to rural generated housing in these areas have been put in place. A significant number of settlements from large towns to small rural focal points are evenly distributed across the county to offer alternatives to one off rural housing.
11. This statement is incorrect. Bawn has been designated as a Tier 6 settlement. Section 3.4.2 indicates that these are smaller cluster settlements, many of which are located around local community facilities and act as important focal points for the wider rural community. There are no development envelopes around these settlements and therefore no significant areas of land around Bawn have been zoned as suggested.
12. Noted.
13. The Border Regional Planning Authority has made comment on the draft development plan stating that it has no objections to the thrust of the Settlement/Core Strategy in Chapter Three.

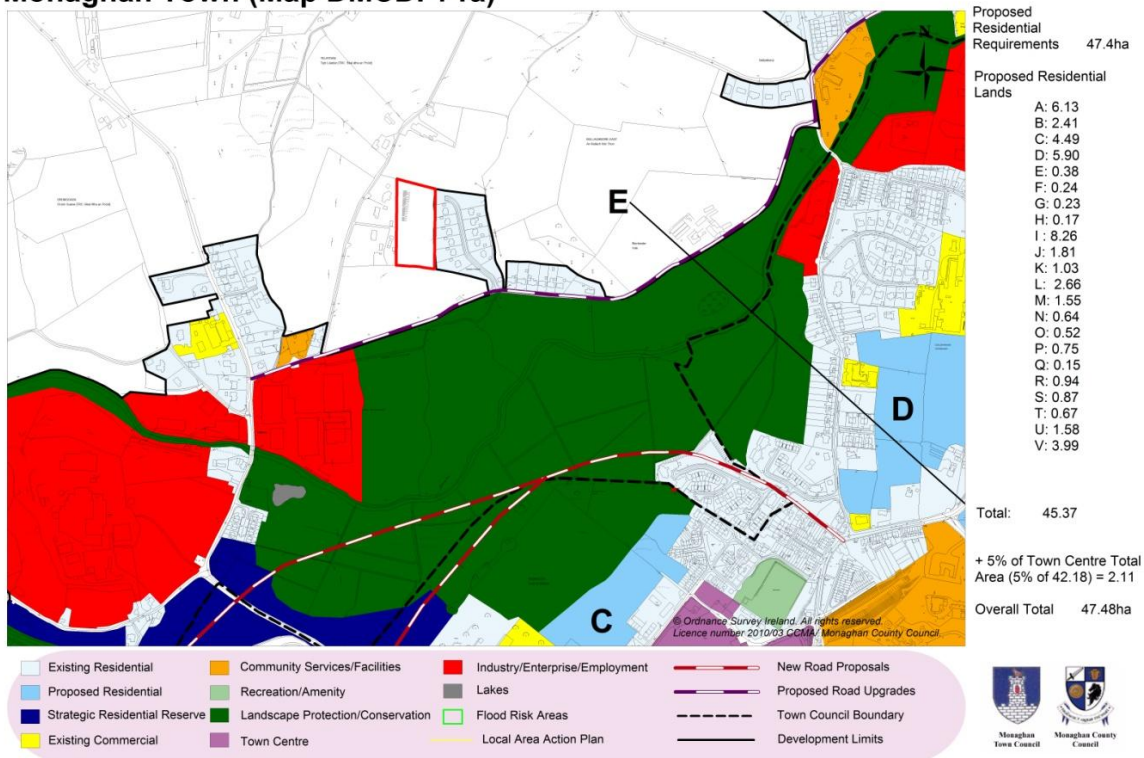
14. The issue of oil price inflation falls outside the remit of the development plan. However, the draft plan includes objectives and policies to facilitate sources of renewable energy.
15. Noted.
16. The draft development plan recognises the importance of renewable energy and the efficient use of energy and includes objectives for energy efficiency and renewable energy accordingly.
17. As point 16 above.
18. Noted.
19. It is considered that there is sufficient reference in the draft plan to climate change, its consequences, such as increased incidences of flooding, and methods to limit it such as the generation of renewable energy.
20. As point 19 above.
21. The Sustainability Tool Kit approach is not a mandatory requirement.
22. Many of the policy objectives contained within the draft development plan include targets, actions and measures which will achieve implementation.
23. Noted.
24. Noted.
25. The policies and objectives contained within the draft development plan are capable of implementation and it is possible to monitor and evaluate the effectiveness of achieving their stated aims.
26. As point 25 above.
27. Noted. However Section 6.3 of the Development Plan Guidelines for Planning Authorities note that inevitably development plans will contain policies and objectives which do not readily lend themselves to quantification. The effectiveness of all policies and objectives contained within the development plan will be subject to monitoring with the initial focus placed on the policies and objectives which are central to the aims of the development plan.
28. The Settlement/Core Strategy in Chapter Three of the draft plan sets out the future development of the county area with particular focus on the phased and sequential development.
29. The issue of a designated implementation officer falls outside the remit of the development plan.
30. A sustainability matrix/tool kit is not a mandatory requirement.
31. A sustainability statement is not a mandatory requirement.
32. Noted.
33. Noted.
34. Agreed.

35. Noted. The draft development plan makes specific reference to climate change, recognises the importance of renewable energy and the efficient use of energy, and includes objectives for energy and renewable energy accordingly.
36. Noted.
37. Noted.
38. Noted.

5.71 Submission Ref: DMCDP71
 Person/Body: Francis McGuigan
 Location: Milltown, Monaghan - Refer to Map DMCDP71
 Core Issue: Zoning of lands for Housing

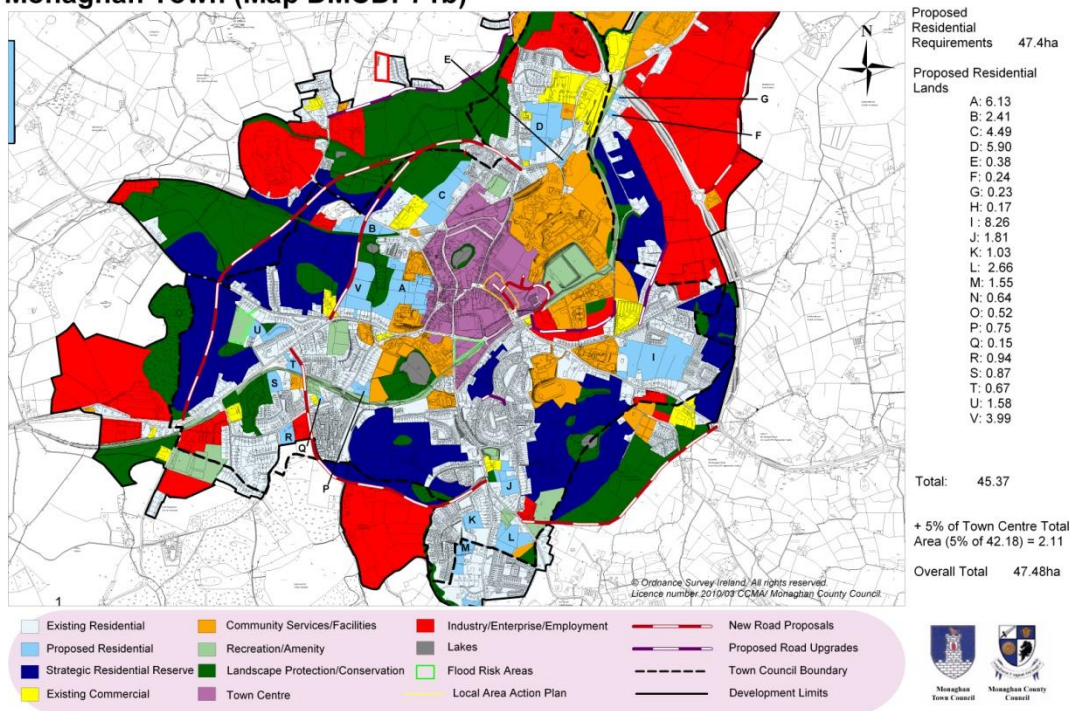
Monaghan Town (Map DMCDP71a)

Draft Monaghan County Development Plan 2013-2019



Monaghan Town (Map DMCDP71b)

Draft Monaghan County Development Plan 2013-2019



Points Raised

1. Planning permission for a housing development on these lands was granted under 99/234 prior to Mr. McGuigan purchasing the site.
2. In December 2004 a planning application for eighteen residential dwellings was granted under file reference P/04/1524.
3. In the Monaghan County Development Plan 2007-2013 the site was zoned for low density housing.
4. In June 2010, an extension of duration for planning permission P/04/1524 was granted.
5. Eleven dwellings have been completed, sold and occupied.
6. Roads, footpaths and public lighting are completed and the development is fully serviced with electricity, water, surface water attenuation and connection to public sewerage via a pumping station. The development is fully landscaped and finished to a high standard.
7. All associated financial contributions and bonds have been honoured which includes the remaining seven dwellings which have not been constructed.
8. The topography levels have been reduced as per planning permission P/04/1524. This excavation involved large volumes of earth removal averaging 7m in depth. Due to this excavation, this portion of development is only accessible via the new roadway which services the existing eleven dwellings. The surface water and foul drainage systems are already in place to serve the seven remaining dwellings to be constructed.
9. The pumping station within the development has a total capacity to serve 75 no. dwellings. Therefore adequate capacity is available, should any dwellings in the Milltown area, which has a high density of septic tanks, wish to link into public sewerage via the pumping station. This would address issues under the Water Services Act 2012.
10. Adjacent to the development on the western boundary, there exists three individual dwellings and one proposed and granted dwelling.
11. The lands where the said seven dwellings would be built is between this western boundary and the existing eleven completed dwellings in the development therefore deeming the proposed development as an “infill site” in accordance with the proposed draft development plan. Submission quotes 8.3.3 Zoning Objective C - Proposed Residential Lands.
12. The said lands have been approved for multiple housing for over a decade now and more recently recognised by the local authority as residentially zoned lands.
13. The site was developed on a phased demand basis and this is the reason that all eighteen dwellings did not commence construction at the same time. This approach avoided the now all too common unfinished ghost estates. This development is currently incomplete and it is the wish of Mr. McGuigan to fully finish the development.

14. This development is the only development around Monaghan which offers low density, detached dwellings on generous quarter acre plots giving a sense of country living on the periphery of the town.
15. F. McGuigan Ltd are a long established building company who have delivered several building projects to very high standards and to the satisfaction of the local authority and continue to remain in business despite the downturn. The construction of the remaining seven units would ensure continued operation of the business and would guarantee employment into the foreseeable future.

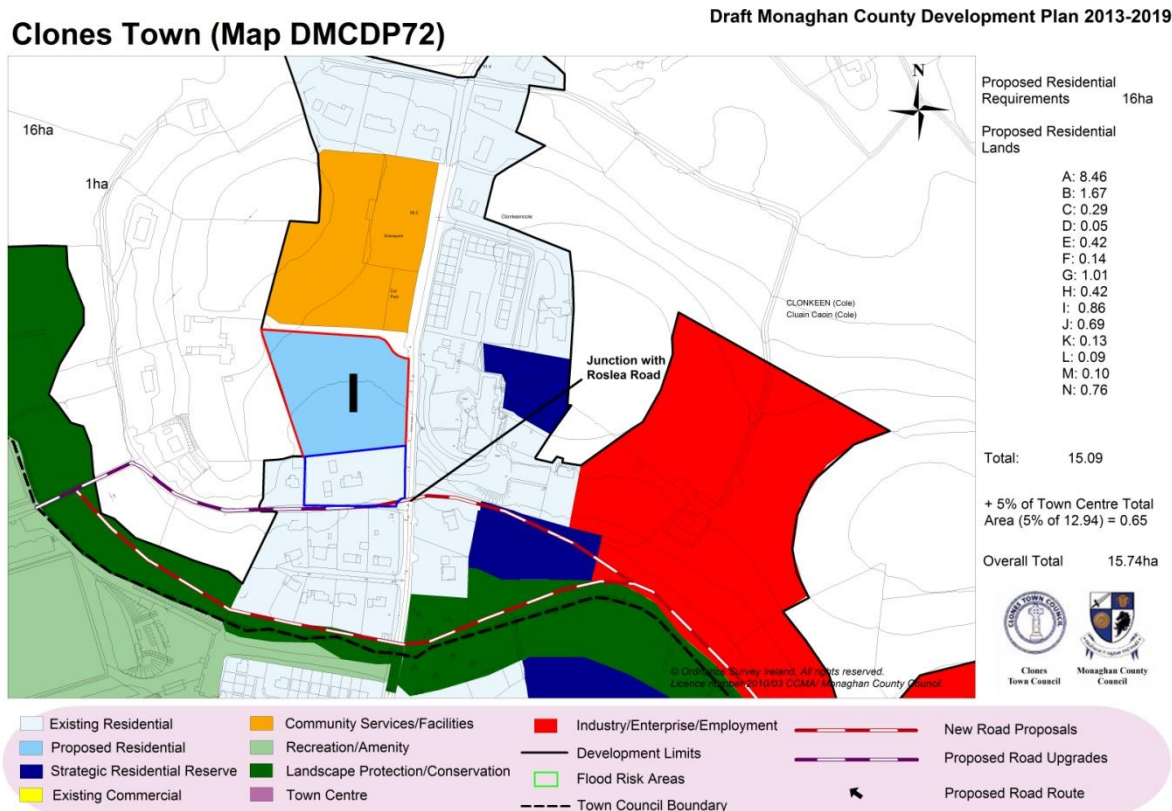
Response of the Manager

1. Noted.
2. Noted.
3. Noted.
4. Noted. An extension of duration of planning permission P/04/1524 was granted up to the 30th June 2012.
5. Noted.
6. Noted.
7. Noted.
8. Noted.
9. The over provision of sewerage pumping capacity is not the determining factor in the zoning of land for development. The Planning and Development (Amendment) Act 2010 and the Department of Environment, Heritage and Local Government's Development Plan Guidelines requires development to take place in a sequential manner from the core of the settlement out wards and that settlements maintain compact forms.
10. Noted.
11. An infill opportunity constitutes the development of a small gap within a substantially built up frontage, or where the development of a gap within existing development would represent the consolidation of a settlement. The subject lands are not considered to constitute an infill opportunity.
12. Noted.
13. Noted.
14. Noted.
15. Section 4.19 of the DEHLG Development Plan Guidelines clearly states that a logical sequential approach should be taken to the zoning of land, where zoning should extend outwards from the centre of an urban area, where emphasis should be placed on infill opportunities and better use of under utilised lands, and where areas to be zoned should be contiguous to existing zoned development land. The Guidelines further state that only

in exceptional circumstances should these principles be contravened and any exceptions must be clearly justified by local circumstances and such justification must be set out in the written statement of the development plan.

Given the requirement of the Planning and Development (Amendment) Act 2010 and the Development Plan Guidelines to ensure development takes in a sequential manner from the core of the settlement out wards, and the fact that there a significant number of plots of land closer to the core of the settlement that are suitable for housing, and capable of providing more than the number of houses required for the projected population increase during the lifetime of the development plan, it is considered that the development of the subject lands would constitute urban sprawl. The lands are removed from the footprint of the settlement and would represent an encroachment into the open countryside which would be against the sustainable principle of maintaining compact urban forms. **Therefore for these reasons, it is recommended that the subject lands are not zoned for either Strategic Residential Reserve or Proposed Residential use.**

5.72	Submission Ref:	DMCDP72
	Person/Body:	Arthur McMahon
	Location:	Clones - Refer to Map DMCDP72
	Core Issue:	Zoning of Lands for Housing/Proposed Road Route



Points Raised

1. The zoning of plot "I" as proposed residential land for up to 14 houses is a very different situation, as it was believed this would be a cemetery in the future. (outlined in red on Map DMCDP72)
2. Any applications for residential development will be challenged by Mr. McMahon to ensure his privacy and investment is protected. (Mr. McMahon's property is outlined in blue on Map DMCDP72)
3. With regard to the Monaghan Road to Roslea Road link road, an alternative route has been considered as a result of flood risk concerns. However, according to the Office Public Works (OPW) this land is not at risk of flooding, and the lands would only benefit from drainage. The Flood National Risk Review carried out by the OPW considers the risk of flooding in this area as either 'very low risk or no risk, and not considered for further attention.'
4. Any flooding in this area is probably back flooding from the N54 and any flooding in this area would mean flooding of a few metres at the Monaghan Road traffic lights given the

change in topography. As a result, the necessity to consider an alternative route based on flood risk is flawed.

5. The alternative route would introduce a four point crossroads with the Roslea Road, with two existing private accesses already onto it. This would create a hazardous situation for users of the private accesses and the public road.

Response of the Manager

1. The Planning and Development Act 2010 required the inclusion of a Core Strategy within development plans, which dictates that lands should be zoned for residential development based on demand and sequential location. The Core Strategy incorporated within the draft County Development Plan has determined the quantum and location of residential lands required during the period of the development based on projected population growth and the sequential approach to land use zoning as stipulated in the Department of Environment, Community and Local Government Guidance Note on Core Strategies, the Development Plan Guidelines and the Sustainable Residential Development in Urban Areas Guidelines published by the Department, and Chapter Five of the National Spatial Strategy. The lands marked 'I' were zoned for Proposed Residential on the basis that they are within the foot print of the urban area, are contiguous to other development and are considered to be an infill opportunity, are served by existing infrastructure, and have good accessibility. It is considered that these lands comply with the policy tests for the zoning of land set out in Department of Environment, Heritage and Local Government Development Plan Guidelines. **Therefore it is recommended that the lands labeled 'I' remain zoned as Proposed Residential.**
2. This is a matter for the development management process.
3. Having reviewed this proposal, it is considered that due to topographical constraints it would not be possible to progress this road. **Therefore it is recommended that this proposed alternative road be excluded from the development plan.**
4. As point 3 above.
5. As point 3 above.

5.73	Submission Ref:	DMCDP73
	Person/Body:	Golder Associates
	Location:	N/A
	Core Issue:	Mineral and aggregates extraction policies and objectives.

Points Raised

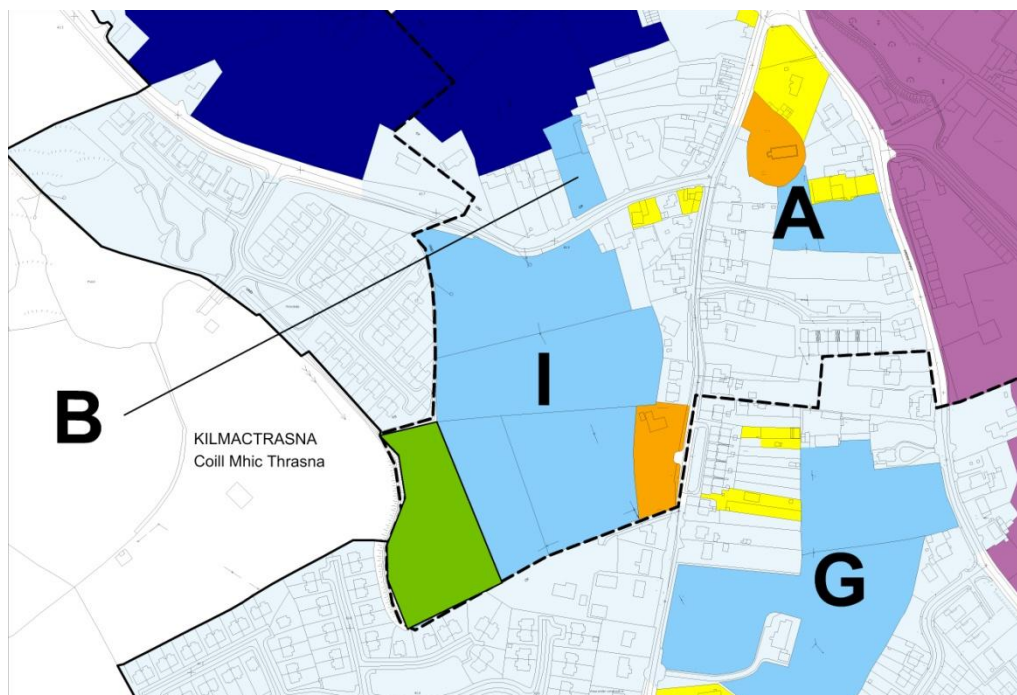
1. Golder Associates are pleased to see that policy has been updated within the draft development plan to specifically recognise the presence and value of the mineral resources existing within County Monaghan and extending into neighbouring counties.
2. This submission acknowledges and supports the policy objectives contained within the draft development plan and request that this policy remains as it is stated without amendment, as the explicit reference to minerals as well as aggregate resources in Section 5.9 and objectives EIO1 through to EIO3 is vital for the future sustainable development of mineral resource activity in the county.

Response of the Manager

1. Noted
2. Monaghan Local Authorities recognises the importance of quarrying and other extractive industries to the economic well being of the county. **Therefore it is recommended that Objectives EIO1-EIO3 will remain within the development plan.**

5.74 Submission Ref: DMCDP74
Person/Body: Woodvale Residents Association
Location: Carrickmacross
Core Issue: Provision of Recreation/Amenity Area and Protection of Mullanary Lake and Watercourse

Carrickmacross (Map DMCDP74)



Points Raised

1. Given the amount of new housing in Woodvale/Foxfield, the residents would like to see some provision of recreation/amenity areas in the new Development Plan to service this area of the town.
2. We would hope that consideration would be given to protecting and enhancing Mullanary Lake and Watercourse.

Response of the Manager

1. Public open space has already been provided within Woodvale and Foxfield housing developments. **However, submission DMCDP46 has requested the southwestern portion of the Proposed Residential land labelled 'I' be removed from the proposed zoning (Indicated in green on Map DMCDP74 above). If the elected members agree to remove 0.93 hectare of these lands from the Proposed Residential land, it is recommended that this portion of the lands be zoned as Recreation and Amenity.**
2. There are a number of Objectives and Policies contained within Chapter Four of the draft development plan which seek to protect rivers, lakes and watercourses.

5.75 Ref: Submission DMCDP75
Person/Body: Tesco Limited
Location: Carrickmacross
Core Issue: Town Centre Zoning

Points Raised

1. Submission welcomes the draft plan and some of the key policy provisions.
2. Support is expressed for the vision of Carrickmacross as a strong retail and service centre for South Monaghan, and plan led town centre expansion on the Convent Lands to the South of the town.
3. The Council is asked to consider a clearer policy support for retail development in the Convent Lands given its town centre location.
4. The Council is asked to consider an awareness of the drawbacks of relying on the quantitative figures in the 2003 Retail Development Strategy for County Monaghan in determining retail need.
5. The Council is asked to consider a renewed focus on the quantitative requirement for retail space within Carrickmacross.
6. Submission provides background to Tesco as one of the largest private employers in the State and as a purchaser of local produce.
7. There is a clear and recognised need for an additional supermarket in Carrickmacross backed up by strong qualitative indicators.
8. A large extant permission for retail development which is unlikely to proceed has hampered the development of a foodstore at this location.
9. A new shopping facility of appropriate scale would provide extra competition and choice, reduce expenditure leakage and support the function of Carrickmacross as a retail and service centre.
10. The Convent Lands area offers the single largest opportunity to provide a meaningful and plan led addition to the town centre.
11. The Convent Lands Masterplan and the Monaghan County Development Plan 2007-2013 have promoted town centre development in this area, and the draft plan continues this in Section 10.1.3.
12. The development of the Convent Lands best supports the sustainable development of Carrickmacross as it will support it as a key retail and service centre for South Monaghan, will ensure best use of serviced land, will help meet the needs of population growth of the town, will capitalise on links with the traditional town centre, will help to extend the town centre in a sustainable and planned way, and will provide additional services and retail investment

13. A statement setting out the development strategy for the Convent Lands area should be included in the plan.
14. Section 10.1.3 of the draft plan should set out a clear policy in respect of the preferred development strategy for Carrickmacross, clarifying that the Convent Lands is the ideal location to address shortfall in retail space in the town and is the preferred location for an expanded range of commercial and retail services.
15. The following statement should be included *“The Convent Lands offer a continuing opportunity for the sustainable expansion of retail development and general town centre services. The Council will continue to promote the area and encourage new development. In accordance with the Retail Planning Guidelines 2012, the Convent Lands are considered a preferred location for new retail development. Applicants should not be required to demonstrate a need for development in this area unless the proposal is of a scale and diversity that it would impact on the balance of retail in the Town Centre.”*
16. The qualitative and quantitative indicators for retail development will be examined in the forthcoming review of the Retail Development Strategy for County Monaghan. However, the requirement of the draft plan to have regard to the 2003 Retail Development Strategy for County Monaghan binds developers to an outdated, inaccurate and wholly inappropriate retail strategy over ten years old.
17. Although the general retail policy and strategy may be sound the figures and calculations are obsolete.
18. Major changes in disposable income, consumer expenditure, population growth, the town catchment area, the retail profile of competing towns, inflows and outflows of expenditure, and the national, regional and local economy have affected the 2003 figures.
19. These changes need to be taken into account in the draft plan in the absence of a revised retail development strategy.
20. The 2012 Retail Planning Guidelines state that the quantitative estimates of future retail floorspace demand should be balanced against the need for vibrancy, choice, vitality and other qualitative issues.
21. The draft development plan should be amended to ensure that an important retail development would not get refused planning permission on the basis of inaccurate and outdated calculations in the 2003 retail strategy.
22. The following statement should be included in the draft development plan *“A Retail Development Strategy for County Monaghan for the period 2012-2019 is currently being drafted In accordance with the Retail Planning Guidelines 2012, the town centre as defined on Map Ref CKDP1 will be the preferred location for new retail development. The Council recognises that there is a deficiency in terms of quality and choice of retail in Carrickmacross and will seek to promote and encourage new retail development in this*

area of the town centre. Retail development with a substantial and diverse comparison offer should be expected to carry out a retail impact assessment. Outside of the town centre, retail development above 500sqm will be expected to carry out a retail impact and sequential assessment”.

23. Objective RTO1 should be amended to remove the reference to extractive industry
24. An additional Objective RTO11 should be included within the development plan stating”
Due consideration will be given to qualitative indicators, such as up-to-date health check assessments in the establishment of retail capacity.”
25. Submission welcomes the car parking standard of one space for every 15 square metres of gross retail floorspace as recognizing the need for sufficient car parking where there is a large rural catchment.
26. Policy PKP8 should be amended to read “*Appropriate planting and landscaping of all car parks shall be required and may take the form of either hard and soft features and planters, depending on the specifics of the case and as appropriate to ensure safe and efficient operation of the car park.”*
27. The recommended changes will provide certainty to developers wishing to invest in Carrickmacross and ensure that the town does not lose valuable retail investment to competing centres.

Response of the Manager

1. Noted.
2. Noted.
3. A significant portion of the Convent Lands are zoned as Town Centre which has the zoning objective of encouraging uses such as retailing, commercial, residential, cultural, and social use. In addition Objective CKO7 supports the development of an expanded town centre on the Convent Lands.
4. Noted.
5. Noted.
6. Noted.
7. This is a matter to be demonstrated as part of an application for retail development.
8. This is a matter which is not a consideration for the development plan.
9. As point 7 above.
10. Objective CKO7 of the draft plan acknowledges this.
11. Noted.
12. Noted.

13. It is considered that the zoning of the Convent Lands as Town Centre, the content of Section 10.1.3, the inclusion of Objective CKO7 and the content of Section 10.10 is sufficient expression of the intentions for the development of the Convent Lands.
14. As point 3 above.
15. It is considered that the first part of this suggested statement is a replication of the contents of Section 10.1.3 and of Objective CKO7. In respect of the final sentence of this suggested statement, it is considered that is a matter to be demonstrated as part of an application for retail development in accordance with the Retail Development Strategy for County Monaghan and the Retail Planning Guidelines.
16. Given the changes in the nature of retail such as the shift to online purchases and reduced expenditure, there is no guarantee that the demand for new retail in Carrickmacross has increased since 2003.
17. As 16 above.
18. As 16 above.
19. The Retail Development Strategy is the most appropriate policy document for a detailed retail strategy for Carrickmacross.
20. Noted.
21. As 16 above.
22. Although the first part of this statement is in keeping with the sequential approach to retailing, the remainder of this statement would pre-empt the completed review of the Retail Development Strategy for County Monaghan.
- 23. It is recommended that Objective RTO1 within Chapter 5 be amended to substitute 'extractive industry' with 'retail development'.**
24. It is considered that the inclusion of this suggested objective would pre-empt the completed review of the Retail Development Strategy for County Monaghan.
25. Noted.
26. It is considered that the suggested amendment of Policy PKP8 is not appropriate and that there are various methods of providing soft landscaping suitable to the ground conditions.
27. It is considered that the Retail Development Strategy for County Monaghan 2012-2019 is the most appropriate policy document to manage retail development in Carrickmacross.

5.76	Submission Ref:	DMCDP76
	Person/Body:	Irish Peatland Conservation Council
	Location:	N/A
	Core Issue:	Protection of Peatlands and Bawn as Tier 6 Settlement

Points Raised

1. Submission is based on the publication of Ireland's Peatland Conservation Action Plan 2020 (copy attached to submission)
2. Attention is drawn to Chapter 3 which details the biodiversity of peatlands. The five following chapters detail the drivers of biodiversity loss and threats to peatlands across the county.
3. Monaghan is estimated to have approximately 43% of its peatland area remaining, The majority of which is fen habitat.
4. Many of the sites are relatively small in areas thus highlighting the need for proper conservation measures to be put in place to protect this endangered habitat.
5. There is both a European and International obligation to protect this rare and threatened habitat for future generations under the EU Habitats Directive and under the Ramsar Convention. Many of these sites are not designated as they were unknown during the time of widespread designation and as a result require significantly more consideration within the new development plan.
6. IPCC's Peatland Sites Database identifies 36 peatland sites of conservation concern in County Monaghan. These are included as an Appendix to the submission.
7. Submission recommends re-surveying of all pNHAs as a priority action within the County Development Plan.
8. In the case of peatlands almost all habitat types are classified as being in 'poor' or 'bad' condition. This highlights the need for detailed management plans to be put in place to properly conserve Irelands Biodiversity.
9. No peatland site in County Monaghan has a management plan in place. The production of management plans for sites of conservation concern needs to be one of the major actions put forward in the development plan.
10. Many sites require restoration techniques to be put in place and this needs to be done in conjunction with local communities and landowners if it is to be successful.
11. It is essential that a scheme for monitoring or management actions and restoration activities are put in place with regular reviews to assess and change management criteria where required. This is applicable to all habitat types throughout the county.

12. Peatland sites face a variety of threats which have potential to destroy or degrade the habitat. These are dealt with individually within the Peatland Conservation Action Plan 2020.
13. A list of sites in Co Monaghan has been included as an Appendix to the submission and details the damage which has already occurred and the threats the sites face in the future. These issues must be addressed.
14. Submission stresses the need for widespread consultation and cooperation with landowners and other governing bodies which will be essential in achieving the goals of the county development plan. This is particularly the case in Monaghan as it supports a number of cross border sites.
15. The position created in 2011 of a cross border Biodiversity Officer is welcomed.
16. It appears that the area directly adjacent to Lough Bawn demesne has been targeted for the creation of a village on a previously green-field site.
17. The 2007-2013 development plan designated Bawn as a Tier 5 settlement, zoning 40 acres for development whereas the draft development plan designates Bawn as a Tier 6 settlement for which development limits are not clear.
18. This designation is surprising given the remoteness of the area and the fact that this has not been subject to public consultation.
19. IPCC has serious concerns over the environmental impact that this designation could have on the area.
20. The site is surrounded by areas that should be afforded protection by National legislation. The site intersects and is adjacent to four interconnected lakes which combined make up two proposed Natural Heritage Areas (pNHAs). It is also adjacent to Linisky Bog which is notable due to the presence of EUH-listed whorl snail and was noted of being of Ecological Value in the County Council produced Monaghan Fen Survey.
21. A progressive development plan should lead a sustainable way forward for Ireland's rare habitats and in this regard protection rather than degradation of this highly regarded biodiverse area is urged.
22. IPCC welcome the creation of the Monaghan County Development Plan which is a crucial step in successfully protecting the counties areas of biodiversity importance.
23. It should be ensured that the document is thorough in detailing the specifics in site and species protection.
24. Monaghan is one of the leading counties in protecting its natural habitats and it is hoped that the county development plan will assure that this continues.

Response of the Manager

1. Noted.
2. Noted.
3. Noted.
4. Noted.
5. It is considered that objectives BDO1-BDO7 and policies DSP1-DSP2 sufficiently addresses these issues.
6. Noted.
7. The legal basis for the designation of Natural Heritage Areas is provided for within The Wildlife (Amendment) Act, 2000. Such designations fall outside the remit of the draft development plan. It is considered that the draft development plan affords a level of protection for biodiversity and natural heritage within the county through objectives BDO1-7.
8. Noted.
9. This issue falls outside the remit of the development plan.
10. Noted.
11. Noted.
12. Noted.
13. Noted.
14. Noted.
15. Noted.
16. Bawn has historically been a rural focal point at a crossroads, having a number of community facilities such as a church, a parochial hall, a handball alley, a public house and a post office in its vicinity. Bawn as a rural focal point would be considered to constitute a Dispersed Rural Community or Tier 6 settlement as set out in Chapter Three of the Monaghan County Development Plan 2013-2019.
17. Section 3.4.5 states that development in Tier 6 settlements will be restricted to single dwellings. Where housing developments are proposed in Tier 6 settlements, the onus will be upon the developer to justify the demand for the housing proposed, the development shall be centered on the focal point of the settlement, and shall be subject to the satisfactory provision of infrastructure and services. All proposals for residential development within Tier 6 settlements will be subject to Policy CSP2 which requires, amongst other criteria, that it reflects the nature, scale and form of existing development within the settlement. **To provide clarity it is recommended that final paragraph of Section 3.4.5 be amended to state “To ensure new residential development is commensurate with anticipated housing demand in Tier 5 and Tier 6 settlements, only small scale housing developments will be permitted in those settlements now**

designated as Tier 5, and residential development in Tier 6 settlements will generally be restricted to single dwellings only”.

18. Bawn has historically been a rural focal point at a crossroads, having a number of community facilities such as a church, a parochial hall, a handball alley, a public house and a post office in its vicinity. Bawn as a rural focal point would be considered to constitute a Dispersed Rural Community or Tier 6 settlement as set out in Chapter Three of the Monaghan County Development Plan 2013-2019. Therefore Bawn is considered to be a settlement.

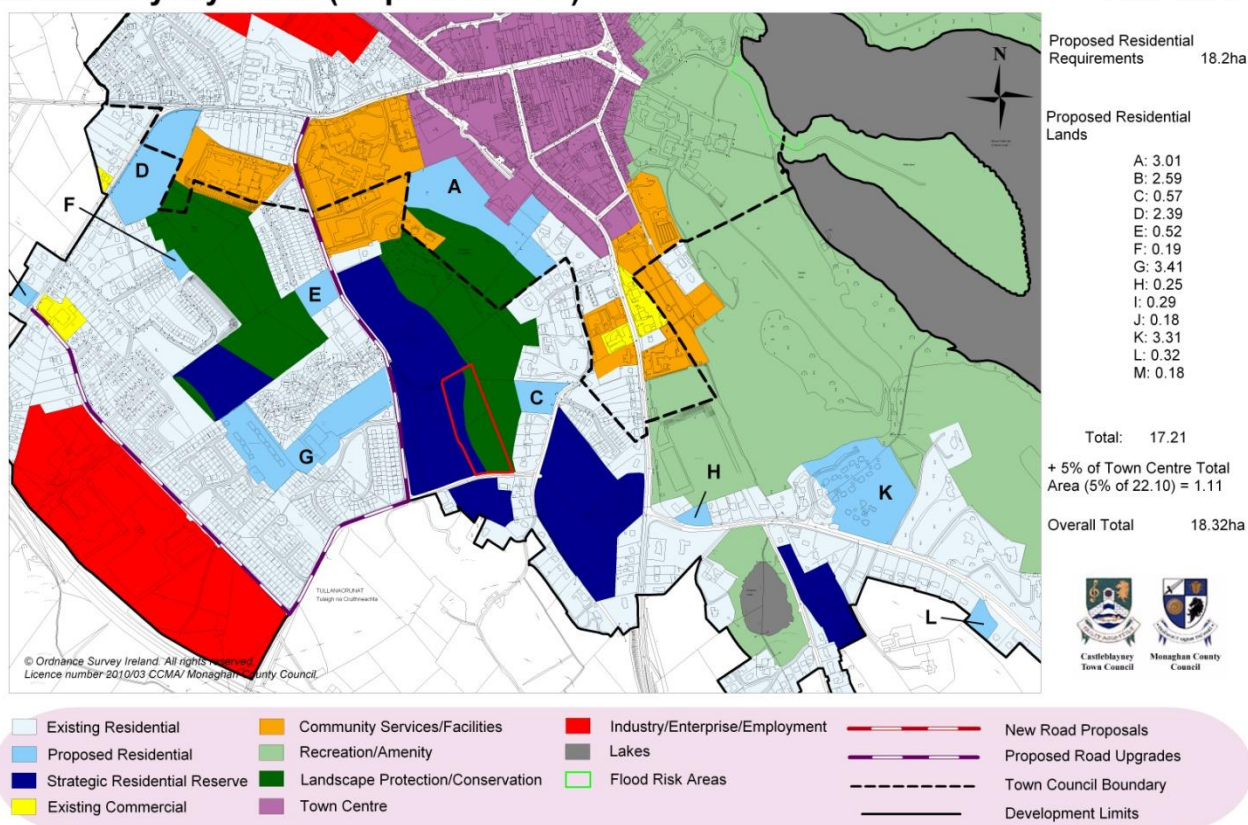
In response to the inference that there was no public consultation, the Draft Monaghan County Development Plan 2013-19 detailing this was on public display for a period of ten weeks between 31st May 2012 and 10th August 2012. The draft plan was displayed in the County Council Offices, the Town Council Offices and Branch Libraries. The draft plan was also placed in the Mobile Library and was available to down load from the County Council website. A Facebook Page was also created. In addition to the statutory requirement to publish a notice of the publication of the Draft development Plan in the local press, a news article explaining the development plan and its implications was also carried in the Northern Standard newspaper on 31st May 2012. A series of public meetings were held in evenings during the end of June in Monaghan, Carrickmacross, Castleblayney, Clones and Ballybay to give the public an opportunity to discuss the draft plan with officials from the planning section.

19. Any development taking place will have to be compliant with all of the relevant objectives and policies within the development plan which include a number of objectives and policies to protect water quality and wetlands.
20. It is noted that Lough Bawn House Loughs are designated as proposed Natural Heritage Areas. The draft development plan contains policies for the protection of such sites.
21. Noted.
22. Noted.
23. It is not considered that there will be a loss of ecology or woodland surrounding Lough Bawn given the objectives and policies contained within Chapter Four providing protection to biodiversity, habitats, landscapes, and designated sites.
24. Noted.

5.77 Submission Ref: DMCDP77
 Person/Body: P. Murphy
 Location: Castleblayney - Refer to Map DMCDP77
 Core Issue: Rezoning of lands from Landscape Protection/Conservation to Strategic Residential Reserve.

Castleblayney Town (Map DMCDP77)

Draft Monaghan County Development Plan 2013-2019



Points Raised

1. Submission refers to two fields measuring 1.82 hectares in Tulnacrunnat, Castleblayney.
2. The subject lands are zoned as low density housing in the current Monaghan County Development Plan. It is clear that the amount of land zoned in the current County Development Plan for residential use in Castleblayney was entirely disproportionate to current and projected demographics of the town.
3. The Core Strategy/Settlement indicates that a significant revision in respect of land-use designation was required for the town and its hinterlands.
4. With a housing land requirement of 84 hectares the settlement was clearly oversupplied with almost 300 hectares zoned for residential development.
5. Options have subsequently been outlined by the Department of the Environment and Local Government for planners to deal with oversupply, which includes the prioritising and

phasing of development land, the designation of alternative zoning objectives to lands, and/or the discontinuation with the zoning designation of the land in subsequent planning documents.

6. The draft plan and accompanying maps suggest that all three options as quoted in point 5 have been utilised.
7. Mr. Murphy is objecting to the portion of his lands which have been zoned as Landscape Protection/Conservation.
8. Mr. Murphy is unclear as to how the designation was arrived upon and queries what the term “Landscape Protection/Conservation” actually means in respect of the subject site.
9. The subject lands are located on the lower reaches of the focal point of Conabury Hill but they are not at the same elevation and neither do they reach the elevation of the adjacent housing estates of Rosevale and Blaeberry Walk situated along the Bree Road nor of other existing and proposed developments in the town.
10. The focal amenity of Conabury Hill is situated on the opposite elevation facing the N2 road and the town and it is important to note that development and proposed development areas are located on this more visually prominent aspect of the hill.
11. The portion of lands zoned for “Strategic Residential Reserve” located approximately half way along the Bree Road and to the rear of the hill is more disruptive to views of the beech trees which mark the apex than the subject sites.
12. It remains unclear as to why the subject lands are zoned Landscape Protection/Conservation. In the Landscape Character Assessment of County Monaghan the lands are not designated under the headings of Special Protection Area, Special Area of Conservation, Natural Heritage Area, proposed Natural Heritage Area or otherwise. Neither are the lands located in an Area of Primary or Secondary Amenity, along a Scenic Route nor have they an ecological designation.
13. The subject lands are not located in a Natura 2000 site nor are they in a RAMSAR site. The SEA Environmental Report reiterates the list of areas assigned to these categories and indicates diagrammatically that the lands are not located in an area of importance such as an aquatic habitat, nor are they of geological, material or scientific significance.
14. The Landscape Character Assessment and the appended SEA both reference the document Landscape and Landscape Assessment (2000). This document outlines the procedures of Landscape Assessment and classification and the guidelines under which sensitive development can be carried out.
15. Landscapes are classified according to three criteria – character, value and sensitivity.
16. Character is classified with reference to scientific measures of landcover and landform, whereas value and sensitivity are more subjective assessments of the importance of a particular landscape.

17. Values are equated with environmental and cultural benefits and are based on landscape attributes of ecological, aesthetic, historical, socio-cultural and religious significance.
18. Sensitivity refers to the capability of a landscape to accommodate change or intervention without suffering unacceptable effects to its character and value and this is assessed with regard to the following criteria:
 - Quality
 - Integrity
 - Distinctiveness
 - Popularity
 - Rarity
 - Cultural Meaning
 - Sense of Public Ownership
 - Social Importance
19. It is not clear as to how any of the above criteria apply in the case of the lands in question which justifies the designation as a landscape of particular significant locally or otherwise.
20. If these lands retain this designation no development can occur which is unfortunate as it was hoped that one of Mr. Murphy's children could build on the lands if they wished.
21. Development on the subject lands would be in accordance with the issues of sustainability as contained within the core strategy, a strategy which is in accordance with the NSS, NDP, DEHLG and RPGs which encourage sequential development of land and efficient use of existing infrastructure within established settlements.
22. The Border Regional Planning Guidelines state the following:
 - Zoning should extend outwards from the centre of an urban area with undeveloped lands closest to the core, and public transport routes being given preference
 - A strong emphasis should be placed on encouraging infill opportunities and better use of under utilised lands and
 - Areas should to be zoned should be contiguous to existing zoned development lands.
23. Policies for new development in towns and villages are contained within Chapter 15 and Strategic Objectives for settlements are contained within Chapter 8 of the draft development plan.
24. It is evident from older OS maps that the lands in question were located in what was once a distinctly rural and agricultural area and functioned sufficiently, in conjunction with other parcels of land in second Bree as a working livestock farm. The rapid suburban development of the town had rendered such an operation impossible. The site is therefore landlocked and with no possibility of extending the holding. Agricultural access and usage is patently untenable from an economic point of view.

25. Mr. Murphy is objecting to the designation of the subject lands as Landscape Protection/Conservation because the lands are not situated in an area of special conservation significant as per the guidelines issued by the Department and regional and national statutory bodies.
26. The subject lands are situated in a suburban area that is geographically one of the closest land parcels to the town, and therefore is of substantial development potential.
27. The lands were historically utilised as an agricultural resource which has been extinguished by the encroachment of residential development on all sides.
28. The subject lands should be rezoned from Landscape Protection/Conservation to “Strategic Residential Reserve”.

Response of the Manager

1. Noted.
2. Noted.
3. Note and agreed.
4. This statement is incorrect. The proposed residential requirement for Castleblayney as indicated within table 3.13 of the Core Strategy is 18.2 hectares and not 84 hectares as stated.
5. Noted.
6. The Planning and Development Act 2010 required the inclusion of a Core Strategy within development plans, which dictates that lands should be zoned for residential development based on demand and sequential location. The Core Strategy incorporated within the draft County Development Plan has determined the quantum and location of residential lands required during the period of the development based on projected population growth and the sequential approach to land use zoning as stipulated in the Department of Environment, Community and Local Government Guidance Note on Core Strategies, the Development Plan Guidelines and the Sustainable Residential Development in Urban Areas Guidelines published by the Department, and Chapter Five of the National Spatial Strategy.
7. Noted.
8. Part of the subject lands are located on an undeveloped part of Connabury Hill a prominent feature in the town’s landscape. The lands have been identified Landscape Protection/Conservation to ensure that developments do not detrimentally impact on the amenity of the landscape or on the natural setting of the town. This is the determining factor in designating the highest portion of the lands as Landscape Protection/Conservation. Section 8.3.9 of the draft development plan provides details with regard to Zoning Objective I - Landscape Protection/Conservation.

9. Rosevale Estate is at a lower contour level than the subject lands. Although Thorndale Estate has been developed up to original contour levels of 155 metres, the development has resulted in significant excavations and is not visually pleasing as a result. Similarly, development has been permitted on higher contour levels on the eastern slope of Connabury over previous decades which are visually prominent and detract from the visual feature that is Connabury Hill. Connabury Hill is a significant and striking feature in the landscape of Castleblayney and it is considered important to preserve this feature from the encroachment of development that would comprise its visual integrity. Therefore it would not be appropriate to permit development in a similar way to that existing on the subject lands.
10. Development has been permitted on higher contour levels on the eastern slope of Connabury over previous decades which are visually prominent and detract from the visual feature that is Connabury Hill. Connabury is a significant and striking feature in the landscape of Castleblayney and it is considered important to preserve this feature from the encroachment of development that would comprise its visual integrity. Therefore it would not be appropriate to permit development in a similar way to that existing on the subject lands.
11. The lands half way along the Bree Road are zoned Strategic Residential Reserve up to a contour level of 135 metres. This level is approximately ten metres below the lowest trees on Connabury Hill. Therefore it is considered that any development of an appropriate height on these lands would not interfere with the views of these trees.
12. The subject lands have been designated as Landscape Protection/Conservation because they are located on a prominent undeveloped part of Connabury Hill which is considered to be elevated lands, and have been designated as Landscape Protection/Conservation to ensure that developments do not detrimentally impact on the amenity of the landscape or on the natural setting of the town. **For this reason, it is recommended that the subject lands retain their zoning as Landscape Protection/Conservation.**
13. Noted.
14. Noted.
15. Noted.
16. Noted.
17. Noted.
18. Noted.
19. As point 8 above.
20. Mr Murphy has a significant amount of other lands both adjoining and cross the road from this portion of the holding which are zoned Strategic Residential Reserve, the zoning objective of which permits the development of single houses for family members.

21. It is accepted that the lands are located in a sequentially favourable location, represent infill opportunity, and their development would assist in maintaining a compact urban form. However, this must be balanced against the fact that Connabury Hill is a significant and striking feature in the landscape of Castleblayney worthy of protection from the encroachment of development that would comprise its visual integrity. Therefore it would not be appropriate to permit development on the higher more visual parts of this hill.
22. As point 21 above.
23. Noted.
24. This statement is disputed. It is considered that the subject lands are not landlocked. Access to the lands is still achievable.
25. As point 12 above.
26. As point 21 above.
27. Noted.
- 28. For the reason set out in point 12 above, it is recommended that the subject lands remain zoned as Landscape Protection. Conservation.**

5.78	Submission Ref:	DMCDP78
	Person/Body:	Monaghan Community Forum
	Location:	N/A
	Core Issue:	Various

Points Raised

1. Monaghan Community Forum was set up under the Local Government Act 2001 to provide a mechanism whereby communities could feed into local decision-making in a structured, comprehensive way.
2. Monaghan Community Forum decided that the County Development Plan was a very important document and that the Forum ought to prioritise engaging in the process of forming the new Plan. It was agreed to make a submission.
3. The priorities set out in the NDP around the development of third level education in the county, the N2 corridor and the re-opening of the Ulster Canal should continue to be prioritised, despite the recent downturn in the economy.
4. We feel that there will be less pressure on Carrickmacross and Castleblayney as dormitory towns serving the greater Dublin area as house prices in the city decrease. Therefore, emphasis should be placed on retention of the 'market town' characteristics of these towns and the need for land banking for additional housing stock curtailed.
5. The traditional settlement pattern in the county is dispersed in rural areas. These areas nevertheless have a very strong sense of community and this should be recognised and valued by the Council.
6. While we understand the need to control urban sprawl around the towns, we ask that the Council continues to view one-off rural housing as appropriate in the more rural areas, as new families will always be needed into an area if the current population levels are to be maintained.
7. The current levels of infrastructure in rural areas have evolved to cope with the current population.
8. Any significant change in population levels will impact on local facilities and services and therefore local service providers ought to be consulted with before planning permission is granted for any development which proposes to significantly alter the number or profile of the local population.
9. We agree in principle that the amount of land zoned for development throughout the county is excessive, and should be reduced.
10. In deciding which areas should remain zoned, we ask that the Council takes into account the proximity of the areas to transportation infrastructure and community facilities, in order

to ensure that the residents of the new developments find it easy to become part of local community life.

11. We are happy with the tiered settlement approach to development, which seems both appropriate and easy to follow, lending to transparency in its application with regard to future planning decisions.
12. We note that the development pressure is around the periphery of towns, rather than in the towns themselves. The Council should apply the Derelict Sites legislation stringently, while at the same time offer incentives to developments in the town centres.
13. We are particularly happy to note that the draft development plan incentivises the renovating and conservation of vernacular houses.
14. We feel that as they are removed from the National Transport Corridors which include the N2 and the new Dundalk-Carrickmacross-Sligo route, Clones and Ballybay are at risk of further decline. We ask that the Council considers putting in place financial incentives to encourage development in and around these two towns.
15. We suggest that given the high level of development around the periphery of the towns during the boom years, the Council should review the town boundaries to ensure outlying housing estates which consider themselves to be in the town are in fact included.
16. The National Tidy Towns competition judges the entire town, regardless of boundaries, and it is affecting the scores for some towns, most notably Carrickmacross.
17. The provision of cycling and walking infrastructure should be promoted.
18. The development of the disused railway and canal lines through the county as 'Greenways' should also be provided for.
19. The Council should seek to address the unique challenge posed by the nature of the county's dispersed population when promoting the use of public transport. The 'Wheels to Work' model operated by over fifty local authorities in the UK may offer a solution.
20. We request that the Council designates Patrick Kavanagh Country as a 'Landscape Conservation Area'. The unique connection between the physical landscape and Kavanagh's work provides an unparalleled insight into the mind of an artist, and is an irreplaceable resource.
21. We note that the Council intends to develop a Green Infrastructure Strategy during the lifetime of the Plan. We ask that the Community Sector be involved in the development of the Strategy, as many of our groups have a stake in improving the biodiversity and green amenity of their areas.
22. The possibility of converting unfinished building sites into public parks should also be actively pursued. For example, the 'Latlorcan Glen' development gives a terrible welcome to Monaghan Town from the N2 and the bypass.

23. We suggest that the Council proactively engages with the community sector to identify buildings at risk, take them into community or Council ownership, and seek to conserve them and bring them back into community use.
24. The training provided to community groups in conservation practices has been most useful and ought to be continued. We feel there may be scope to develop a network of heritage buildings throughout the county which could be marketed as a 'dispersed hotel', managed by local community groups and linked to the local community centres in order to ensure the visitor of a 'total immersion experience' in local life. Such a development would support the development of a sustainable tourism product in the county.
25. We would like the Council to add 'develop Patrick Kavanagh Country' as an objective.
26. Access to fast, reliable, affordable broadband remains a challenge in rural areas. We acknowledge the Council's activity to address this and encourage you to continue to prioritise this issue.
27. Please note that the network mentioned, 'Monaghan Against Disadvantage' is no longer operating.
28. We welcome the inclusion of allotments development in the Plan.
29. Please incorporate the development of 'Community Arts' in the Plan. Whilst there is certainly a place for the professional product, we believe that building an audience for that product starts with getting people to engage with the arts on a personal level. There is a huge difference between putting an 'artist in residence' into a community, and facilitating a community group to produce their own art. There is a huge personal development benefit to the latter approach, which will underpin so many of the other aspects of development for which the Council strives.
30. The Council's objectives in this regard match those of the Community sector.
31. We would particularly encourage the provision of a youth hostel type centre in the County as when youth groups visit, there is nowhere for them to be hosted if they do not want to go to an activity centre. This means many youth groups opt for accommodation in neighbouring counties rather than in Monaghan.
32. We note that a Walking & Cycling Strategy for the county is to be drafted. Please include Monaghan Community Forum in the consultation stage.
33. Recent progress by the Council in developing a Greenway along the old Ulster Canal tow path through Monaghan should be updated in the Plan.
34. The objective to create a Greenway from Clones to Glaslough should be included.
35. We are pleased to note the reference to our 'Monaghan Model' consultation guide in this section.

Response of the Manager

1. Noted.
2. Noted.
3. Noted.
4. Noted.
5. Agreed.
6. “Housing in Rural Areas” is dealt with in Section 3.5 of the draft development plan. In accordance with the Sustainable Rural Housing Guidelines for Planning Authorities, and to ensure that development in the countryside outside the planned limits of the settlements takes place in a sustainable manner, which reflects the needs of the rural communities, the county has been divided into three development management zones based on different rural area types. Housing is encouraged in those areas which are designated as structurally weak.
7. Noted.
8. This is a matter for development management.
9. One of the key elements of sustainable development and the Core Strategy is compact urban form. In addition, the purpose of the development plan is to ensure the orderly development of land in a sustainable manner which ensures compact urban forms, encourages cycling and walking, makes use of existing infrastructure and minimises urban sprawl and loss of agricultural land.
10. As point 9 above.
11. Noted.
12. It is considered that Objective TCO5 in Chapter Eight sufficiently addresses this issue.
13. Noted.
14. This matter is outside the remit of the Development Plan.
15. The process of review of town council boundaries is outside the remit of the development plan.
16. Noted.
17. It is considered that Objectives CWO2, CWO3, CWO4 and CWO5 and Policies CWP1, CWP2 and CWP3 in Chapter Seven are sufficient to address this issue.
18. Section 7.5 contains a significant number of objectives and policies to promote cycling including the development of a cycling strategy for the county, the identification of safe cycle routes in urban areas and between the main towns and villages, and appropriate directional signage, during the lifetime of the plan. Section 4.10 contains objectives and policies on Green Infrastructure, which includes the mention of the use of disused railway lines and the Ulster Canal towpath.

19. It is considered that Objectives TRO3, TRO4, and PTO2 in Chapter Six are sufficient to address this issue.
20. Patrick Kavanagh Country is not clearly defined in geographical terms and it would be difficult to designate it as a 'Landscape Conservation Area'. In addition, the designation of this area as a Landscape Conservation Area could restrict development in an area that is intensively farmed.
21. Noted.
22. This issue falls outside the remit of the development plan.
23. The National Inventory of Archaeological Heritage (NIAH) shall be completed at the end of 2012. It is anticipated that additional structures may be added to the Record of Protected Structures during the lifetime of the development plan which will reflect the survey work undertaken by the NIAH. In addition it is considered that objectives PSO1 and PSO2 are sufficient to address this issue.
24. This issue falls outside the remit of the development plan.
25. Objectives TMO1-18 in Chapter Five seek to support and encourage tourism opportunities.
26. This issue falls outside the remit of the development plan.
- 27. It is recommended that reference to 'Monaghan Against Disadvantage' is removed from Section 7.1 of the development plan.**
28. Noted.
29. It is considered that Objective CIO2 is sufficient to address this issue.
30. Noted.
31. The provision of a youth hostel is outside the remit of the development plan.
32. Noted.
33. Reference shall be made to the development of a Greenway along the old Ulster Canal tow path through Monaghan in the Green Infrastructure Strategy.
34. The proposal to create a greenway between Clones and Glaslough will be incorporated into the Green Infrastructure Strategy.
35. Noted.

5.79	Submission Ref:	DMCD79
	Person/Body:	Cootehill Area Development Limited
	Location:	Cootehill
	Core Issue:	General

Points Raised

1. The amenity area at Halton's is not marked on Map 4.1. Tannagh Outdoor Education Centre use this area as well as Cavan/Monaghan Safe Swim instructions every year.
2. This project should be listed under the Objectives for Tourism listed on pages 120-121.
3. Submission wishes to see the R188 listed as a Strategic Non National Road as opposed to a Regional Road. The Cootehill to Ballybay Road which is a quieter road is listed as a Strategic Non National Road within the draft development plan.
4. The Cavan to Dundalk Strategic Route improvement scheme is at preliminary design stage and includes the Carrickmacross to Shercock Road. This should be proposed in policy given that the Carrick-Dundalk section has been recently upgraded as per the National Spatial Strategy and Border Regional Guidelines.
5. Page 108 refers to Bord Gais Servicing Industry. Agreements have been signed and confirmed by Abbotts and Bord Gais that Natural Gas will be extended into Cootehill and Abbotts by 23rd August 2013.
6. More reference should be made to built heritage in Dartry and Bellamount and in particular the work which has been completed at the Dartry Temple. The monument is listed as a protected structure.
7. It should be an objective/policy to map all of the protected structures in the county.

Response of the Manager

1. Map 4.1 contained within the draft development plan details Sensitive Surface Waters within the county. The area at Halton's is not considered as a sensitive surface water.
2. Objectives TMO1-18 seek to support and encourage tourism opportunities. The objectives are general in nature and it is not considered necessary to include references to specific events.
3. A proliferation of Strategic Non National Road would dilute the effectiveness of funding for these roads. The designation of the R188 Monaghan–Swan's Cross–Cootehill Route or the R162/R190 Monaghan–Ballybay–Cootehill Route as the Strategic Non National Route requires a study of matters such as long term traffic movements data and the type of traffic using these routes. **Therefore in the absence of this data, it is recommended that the option of both are indicated in the table in Section 6.2.11 as follows:-**

Road	Route
R188 / R162-R190	Monaghan-Cootehill / Monaghan-Ballybay-Cootehill
R178	Dundalk-Carrickmacross-Shercock
R181	Keady-Castleblayney-Lough Egish-Shercock
R183	Castleblayney-Ballybay-Clones

4. The Dundalk to Shercock Road (R178) has been listed in Section 6.2.11 as a Strategic Non National Route. The scheduling of improvements to this road is matter outside the remit of the development plan.
5. Noted.
6. Section 4.11 of the draft development plan contains objectives and policies for the conservation and protection of all heritage features in County Monaghan.
7. Section 4.11.1 of the draft development plans refers to the record of protected structures and contains objectives and policies for the protection of protected structures. A full list of protected structures and monuments in the county are laid out in Appendices 5, 6MN1, CK1, CY1 and C1 of the draft development plan.

5.80 Submission Ref: DMCDP80
Person/Body: Seamus Mulligan
Location: Inniskeen
Core Issue: General

Points Raised

1. Broadly welcomes the draft plan as proposed.
2. Mr. Mulligan recommends that a policy be adopted whereby multi-unit residential development in Inniskeen should reinforce the identity of the village centre and core.
3. Development should not be considered which is located on the fringes or edge of the village which leads to sprawl into the surrounding countryside.
4. Planning permission for development should not be granted for any development which cannot be considered a natural extension of the village.
5. Any lands developed should be contiguous to the village core whereby the village can develop in an organised pattern without housing estates being fastened onto the village fringes.

Response of the Manager

1. Noted.
2. Inniskeen is designated a Tier 4 settlement. Planning applications for residential development in Tier 4 settlements will be granted where the development meets criteria (i)-(viii) of Policy CSP2. Policy CPS2 (iii) requires that “the development reflects the nature, scale and form of existing residential development in the settlement”.
3. Section 14.2 of the draft development plan states “development limits have been defined around Tier 4 villages to allow for appropriately scaled growth, to protect their character and to prevent ribbon development and urban sprawl in the surrounding countryside”. In addition settlement envelopes are based on the existing built footprint of the villages, with the aim of consolidating existing development.
4. As point 3 above.
5. Inniskeen is designated a Tier 4 settlement. Planning applications for residential development in Tier 4 settlements will be granted where the development meets criteria (i)-(viii) of Policy CSP2. Policy CPS2 (ii) states that “the development contributes to the sequential development of land from the centre of the settlement outwards and/or represents an infilling of the existing settlement footprint”.

5.81	Submission Ref:	DMCD81
	Person/Body:	Lough Bawn Trustees
	Location:	Bawn
	Core Issue:	Designation of Bawn as Tier 6 Settlement, Protection of Water Quality and Designation of new Scenic Routes and Area of Primary Amenity

Points Raised

Points Raised

1. Bawn is typically populated with one off rural houses; some are stand alone while others are in small clusters.
2. The dominant feature of the area is the grounds, forests and lakes of Lough Bawn Domain.
3. There are two proposed Natural Heritage Areas (pNHAs), Black Lough and Derrygooney Lough, and Black Lough and Lough Bawn, both of national importance, while Lisinisky Marsh is of county ecological importance.
4. Within the vicinity of Lough Bawn House is a vacated public house a handball alley, a Catholic Church and a recently contrasted council estate.
5. The eight units are serviced by two access lanes which lead to undeveloped lands, and a sewage pumping station. It is evident that given the standard of the access design and the capacity of the wastewater treatment plant the estate has been laid out to accommodate future development.
6. Lough Bawn House is a protected structure.
7. There are a number of national monuments within the grounds of the demesne and Bawn area.
8. According to the proposed plan the area is also part-subject to a number of wider environmental designations including:
 - Area of Secondary Amenity Value – Billy Fox Memorial Park and Environs
 - Two views from Scenic Routes SV22 and SV23
 - Sensitive surface water –Lough Bawn System
 - Included in an area of Extreme or High Groundwater Vulnerability.
 - No development within 200 metres of sensitive drinking water source
 - Two pNHAs.
9. The proposed planning policy associated with the development of Bawn is contained within Chapter 3: Settlement/Core Strategy.
10. The current strategy defines Bawn as a Tier 5 Settlement and provides a plan outlining the extent of the zoned development land within which commercial and residential

development is considered appropriate. Outside the boundary the area is limited largely to one-off rural housing controlled under policy RH9.

11. The draft development plan proposes to move Bawn from a Tier 6 settlement to a Tier 5 settlement and the development limits have been removed, however commercial scale development is encouraged in Bawn.
12. The draft development plan is contradictory. Page 47 states “therefore any future development taking place in these settlements is expected to be limited and to be mainly in the form of single detached dwellings replicating development taking place in the open countryside” but then follows by saying “residential development in Tier 6 settlements will be restricted to single dwellings only”.
13. According to Section 3.4.6 single dwellings in Tier 6 settlements are directed to appropriate locations and controlled under CSP1 and CSP2. The use of certain words and phrases such as ‘developer’, ‘residential development’, ‘infilling of existing settlement footprint’, ‘efficient use of existing infrastructure’ are more common when discussing multiple unit commercial development rather than one off rural housing.
14. Usually a person seeking permission for a one off house would be described as an ‘applicant’ not as a ‘developer’ who invests in the construction of property for sale. ‘Applicants’ for one-off houses will mainly seek a home for themselves and/or family.
15. The use of ‘residential development’ suggests multiple units rather than a single house. The emphasis is that, subject to sequential approach, multiple-unit residential development will be encouraged in Bawn.
16. There is certainly capacity in the existing council housing development for additional sewage treatment representing “efficient use of existing infrastructure” another term common to larger commercial development.
17. It is noted that the test to measure appropriate levels of development in Bawn is ‘demand led’. Given a population for allocation for Tier 5 and 6 settlements is 4,764, it will be relatively simple to prove ‘demand’ for housing.
18. While there may be local disagreements on appropriate numbers between developer and planning authority, suitable proof of demand will be readily forthcoming from interested stakeholders such as agents and those with a desire to live in rural areas.
19. Page 48 states “any applications for residential development not considered to be located within any of the settlements will be assessed under those policies applicable to rural housing policies (RH1-RH13)”. Thus there will be a point at which the settlement ends and the rural area begins but this is not defined. Traditionally this would be considered unsatisfactory as it breaches a duty of Monaghan County Council to provide certainty and clarity when drafting policy.

20. Assuming this dividing line can be found, policies RP12-RP13 will apply to one-off rural housing in Bawn which does not require proof of 'need' or the completion of Form RH1.
21. The overall effect of the proposed policy remains largely the same save for the blurred line between the so-called settlement on the one hand and the rural area on the other.
22. The Settlement/Core Strategy notes that "one of the key purposes of a development plan is to make provisions for sustainable population growth". One of the main factors of sustainable population growth is locating population in appropriate locations.
23. Bias towards dispersed rural settlements creates many problems including:
 - Increased cost of living
 - Inefficient allocation of funding for new infrastructure
 - Weakening town centres
 - Dilution of community cohesion
 - Compounding a culture of rural housing demand as opposed to need.
 - Increased car trips and trip length for access to jobs and services
 - Depreciating standard of living and human health.
24. Page 30 of the plan notes "The issue of urban balance needs to be addressed carefully in this development plan" however it recommends a paradoxical dual aim of sustaining vital rural areas and a strong urban structure.
25. Table 3.2 of the draft plan highlights that a relatively small percentage of the population is located in urban areas but the analysis is somewhat sparse.
26. Table 3.1 of the submission indicates relative growth/decline in urban DEDs. Growth has been outward-shifting into rural areas, most notably from Monaghan, Carrickmacross and Castleblayney where the rate of population increase has outstripped the Urban DEDs by multiples. Of greater concern is the loss of population from central urban areas to the outskirts of towns and the wider rural landscape.
27. Figure 3.2 of the submission illustrates the relative decrease since 2002 in the proportion of population residing in the urban DEDs versus the total county population. Since 2002 there have been two Development Plans and neither has been influential in preventing population spillage into rural areas.
28. To address this problem, the Draft Plan points to the need to ensure that promoting the critical mass of the region's key settlements is prioritised and states that towns with a population of 1500-5000 need to be strengthened and that smaller settlements and the wider rural area faces challenges that require their promotion as a functional entity.
29. The draft plan seeks to ensure that the "traditional pattern of dispersed settlement in rural areas together with a network of towns and villages is developed and strengthened". Particular emphasis is placed on the growth of Monaghan, Carrickmacross,

Castleblayney, Ballybay and Clones as they make up the first three tiers of the county settlement strategy.

30. The plan states that development limits have been removed from Tiers 5 and Tier 6 settlements because there has been limited development growth, yet at the same time development is to be encouraged at an appropriate scale and nature in these communities.
31. The proposed Strategy will not have the impacts it hopes to achieve: greater focus on urban growth in main settlements. Settlement strategies are politically charged and this strategy represents 'planning by vote' rather than by 'evidence'.
32. The evidence in this case points to the retention of the status quo. The proposed allocation of population will serve only to perpetuate and sustain the current proportions of the urban/rural divide.
33. The text of the draft plan encourages a shift to greater concentration of population in the larger settlements but the figures demonstrate that, in practice, rural areas will be allowed to grow at the same rate as before.
34. Based on the council's allocations the surge towards a dispersed rural population since 2002 will be maintained. The rural population living outside the main urban settlements in Tiers 1-3 has consistently remained around the 60.5% mark, which does not account for the 25-27% of people who live in the rural DEDs neighbouring the main urban areas. In other words dwellers will be the same in six years as it is now – this does not reflect a strategy seeking to concentrate population and make efficient use of existing and proposed infrastructure.
35. It is difficult to understand how the council hopes to achieve critical mass in towns such as Monaghan when the analysis of its population allocations suggests the opposite. With such a relaxed one off rural housing policy the drift towards rural housing will continue at pace.
36. The main concern is whether or not the council expects limited growth in locations such as Bawn, 56% of the projected population growth to 2019 has been allocated to the so-called Tiers 5 and 6 settlements, which have no development limits. That is a very large unsustainable burden for sensitive rural areas such as Bawn to share.
37. Bawn is one of the most ecologically sensitive areas in the county and has limited capacity to assimilate additional commercial and residential development.
38. While the policy throughout the draft plan seeks to focus development in urban areas, the Core Strategy's allocation of population contradicts this.
39. Bawn is a 'community' not a 'settlement'.
40. Bawn does not have the trappings of a settlement for example it has no shop or school unlike Latton.

41. To sustain a small shop in Bawn would require a population of at least 500 people located close to the shop to allow easy access, usually by foot to ensure frequent footfall. This can't be achieved in Bawn, the former public house has been closed for a number of years and although the handball alley is active, such facilities are common in rural areas of Ireland.
42. The areas planning history profile also illustrates the true nature of Bawn – the overwhelming majority of applications in the area has been for rural/urban generated one off housing save for the handball alley and the Part 8 housing.
43. Twenty one applications for one off housing have been made in the area since 2000 and only five of which were inside the designated Tier 5 settlement contained within the current development plan. Of these three were refused and after re-submission were granted. Only one was refused on the basis of potential environmental impact from proposed wastewater treatment systems.
44. A number of observations can be made regarding this assessment:
 - Rural/urban generated housing is generally permitted in the area despite the sensitivity of the surrounding landscape and ecological value
 - Private one off housing inside the designated Tier 5 settlement has been limited
 - The intent of the development limit as a means of encouraging residential development in a sequential manner has not materialised.
45. In 2005 the council granted planning permission for eight houses, serviced by two access points. Clearly this has been to facilitate further development lands to the west of the demesne.
46. Foul water is to be discharged by gravity to the pumping station to the south of the houses and then pumped up to Derrygooney Lough. Submission has estimated that this work would have cost €500,000. A normal treatment system would have been less expensive.
47. The council granted permission on the basis that “the proposed development is located in a structurally weak rural area that has suffered a declining population. The 8 dwellings would enhance the area in terms of social and economic development in an isolated location”.
48. In addition a submission was made in relation to the housing development by the Bawn Housing and Community Association who supported the development for a number of reasons including the following:
 - Creation of a focal point.
 - Sustain population growth and services such as pre-school/primary school/after school activity club.
 - Sustain the recently launched BaltiBus.
 - Strengthen the Bawn Handball Club.

- Strengthen and support Bawn Community Centre.
 - Support local business
 - Increase community interaction
 - Provide greater security, especially for the elderly.
49. The only achievement of the development when measured against the criteria above has been the creation of a “focal point”. The development would have contributed to population growth but the area has seen consistent growth since 2002.
50. The council houses do create a focal point although it is a concern of the Lough Bawn Trustees fear that the focal points in the Bawn area are scattered over a wide area hundreds of metres apart in some cases. In each case they either immediately abut or are within the most sensitive environments in Bawn.
51. Section 3.4.4 of the development plan defines focal points as including development around a crossroads, a shop, a church, post office, etc. This list is not exhaustive and it is left to the applicant to make the case.
52. It is clear that so-called focal points are to be used as markers for locating “commercial housing schemes” and, probably more deliberately, for additional social housing.
53. Rural generated one off housing has unlimited choice of location in the area as a whole, so these focal points are clearly not intended to draw rural generated one off housing into a central area. Their purpose is clearly to facilitate and attempt to focus commercial development into a central area.
54. The focal points are located in some of the most environmentally sensitive areas of Bawn, either close to wetlands or the lakes themselves. For example any development around the church or the council housing would have to pump treated effluent to Derrygooney Lough as an alternative to Black Lough or Lough Bawn.
55. The spatial distribution of the focal points indicates the substantial area over which commercial development could realistically take place. This is much greater than the area designated as the current Tier 5 settlement limit.
56. Bawn is located in Corracharra DED and is surrounded by Raferagh, Bellatrain, Creeve and Cormeen. With the exception of Creeve and Bellatrain these DEDs are included as part of the defined Structurally Weak Rural Areas (SWRAs).
57. The key measurements that define SWRAs as noted within Section 3.5.3 of the draft plan include:
- Persistent and significant population decline
 - Low population density
 - Weaker economic structure
58. It appears somewhat contrived that differential development pressure levels are applied in such an arbitrary fashion. Those areas that have proven decline in population might

continue to be included as SWRAs but so-called Stronger Rural Areas should be included as Rural Areas Under Strong Urban Influence.

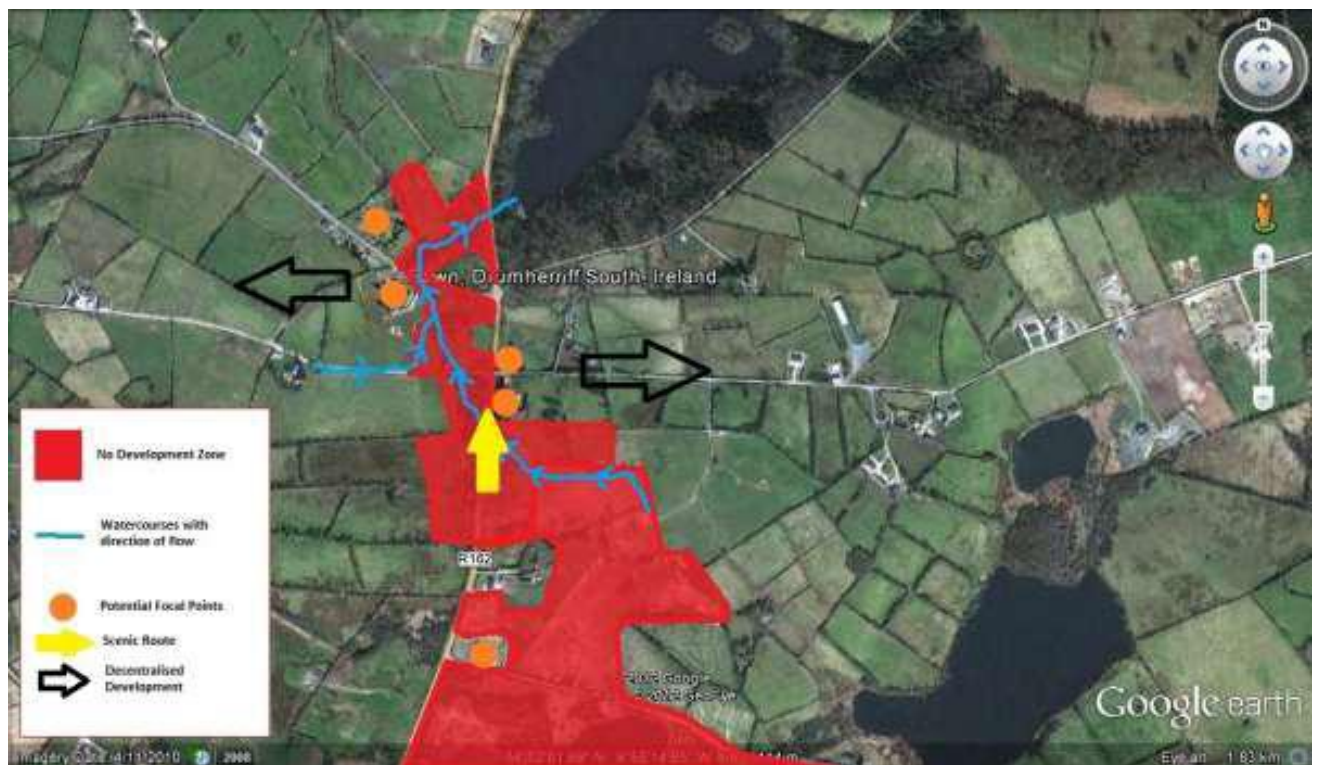
59. Most DEDs around and including Corracharra have experienced growth since 1991. Whilst these areas have a low population density that is reflective of the fact that they are rural areas, it does not follow that they have a “weaker economic structure”.
60. The defined development pressure areas appear to form the basis for the SWRA, with only a few exceptions.
61. The appropriate key measurement of persistent population decline does not apply to Corracharra and its neighbouring DEDs.
62. On the basis of the above, the entire basis of the Tier 6 designation must be called into question.
63. Allowing for the increase in development in the manner proposed or indeed designating Bawn as a settlement at all must have a purpose. In the draft plan that purpose is to strengthen rural communities, however that policy has not succeeded in the past and will not succeed in the future for the following reasons:
 - Most housing generated in the area has been rural or urban-generated one-off housing.
 - Housing has tended to locate outside the designated settlement.
 - Council housing has been shoe-horned into the area, bringing no discernible positive benefits.
 - Actively promoting the area for commercial residential development places the area’s ecological value at risk, and degrades the quality of the rural landscape and the setting of the area’s protected structures and national monuments.
64. Most worryingly the council has not explored the proposed omission of a defined limit of development or indeed clearly defined areas where development should be prohibited.
65. While Bawn cannot sustain commercial residential development, there should be protective policies that give guidance on where one-off housing may be inappropriate or indeed should be prohibited.
66. Submission summarised the ecological value of sites, habitats, flora and fauna in the Bawn area. Relevant sites include Lisinisky Marsh, Lough Bawn House Loughs pNHA.
67. Wetlands are an important resource both nationally and in Monaghan, however they are under threat from a variety of pressures. Development and associated activities are a key threat.
68. The Bawn-Lisinisky wetland complex is of county to national ecological importance and therefore requires policies and objectives to protect its biodiversity and ecosystem function.

69. Council should re-visit its allocations at Table 3.12 and 3.13 to rebalance in favour of the larger urban settlements.
70. Remove Tier 6 from the settlement hierarchy at table 3.11
71. Tier 5 should be the smallest allowable settlement.
72. The references to Tier 6 and relevant accompanying text at page 44, table 3.12, pages 46, 47 and 49, including references in CSP1 and CSP2 should be removed.
73. The removal of Tier 6 settlements is required because as part of the 2011 variation to the current development plan, Tier 5 was the lowest tier in the settlement hierarchy, however in a matter of months Tier 6 settlements have been reintroduced with no justification.
74. In addition the entire concept of Tier 6 will lead to improper planning with development potential stretching beyond the boundaries of the current Tier 5 development limit.
75. After reconfiguring the Tier 5 and 6 settlements, as proposed above, Bawn should be removed from the settlement hierarchy along with other similar rural areas. These areas are not suitable for commercial residential development which is presently allowed within Tier 6 settlements. The areas are rural, have no services and are not suitable for commercial development.
76. Further attempts to integrate additional commercial housing into the area will add greater pressure on the capacity of the area to absorb development.
77. The costs of servicing such development are extremely high, as proven by the foul water treatment and pumping system installed in the Part 8 development in Bawn.
78. Remove Section 3.5.1 Stronger Rural Areas.
79. Only DEDs where population decline has been persistent should be included in within the Structurally Weak Rural Area.
80. All remaining DEDs should be included in the 'Area Under Strong Urban Influence'.
81. Map 3.2 should be amended accordingly.
82. The justification for the above is because there is no clear differentiation between 'Stronger Rural Areas' and 'Areas under Strong Urban Influence'. Without clear demarcation, the preference should be to strengthen development management controls to allow families and employees with genuine rural need to locate in these areas.
83. Only with a more stringent system of control can the aims of the Core Strategy be realised.
84. Submission quotes policy WPP6 and recommends that the watercourses (streams and drainage ditches) which link Lisinsky Marsh and Loughbawn House Loughs pNHAs should be promoted as a riparian corridor.
85. Submission quotes policy WPP11 and states that Bawn designated settlement unit contains wetlands and watercourses which are integral to the functioning of Lisinsky Marsh and Loughbawn House Loughs pNHA. Development in this area would therefore

potentially have an unacceptable impact on the water environment. The Lisinisky Bawn wetland complex should this be excluded from the Bawn designated settlement unit.

86. Submission quotes policy WPP12 and recommends that the watercourses (streams and drainage ditches) which link Lisinisky Marsh and Lough Bawn House Loughs pNHAs should be promoted as a riparian corridor.
87. Submission recommends that the following objective be included as BDO8 “designate Lisinisky Marsh as a Site of County Biodiversity Importance”.
88. Submission recommends that the following objective be included as BDO9 “As Lisinisky Marsh supports the 4.23 hectares of the Annex 1 habitat ‘Transition Fen’ and a good population of the nationally rare wetland snail *Vertigo Lilljeborgi*, further ecological assessment of the site should be undertaken to determine whether it qualifies for protection as a Natural Heritage Area (pNHA).
89. Submission recommends that the following objective be included as BDO10 “Undertake hydrological study to determine the hydrological linkages between Lisinisky Marsh and Loughbawn House Loughs pNHAs and land within the Bawn Designated Settlement Unit. There are clear hydrological links through watercourses and drainage of wetlands, but there may also be groundwater flows. This data will enable sustainable land-use planning in this area, in keeping with the ecological objectives in the Draft Monaghan Development Plan”.
90. Establish a riparian/ecological corridor between the nationally important Loughbawn House Loughs pNHA and Lisinisky Marsh ‘Bawn-Lisinisky wetland complex’. This wetland complex should be protected from development as it is incompatible with its function as an important ecological corridor.
91. A plan should be included in the development plan highlighting a development exclusion zone, reflecting Figure 5.1 of submission (refer to map below). This exclusion zones includes a) watercourses (drainage ditches and streams); b) wetland areas such as wet grassland that are likely to drain into the watercourses or Lisinisky Marsh ; and c) a buffer zone around watercourses and Lisinisky Marsh. This is a minimum exclusion area.
92. A new wetlands objective should be included as WLO2 “Development will only be considered within the exclusion zone in exceptional circumstances”.
93. Submission recommends that the Council revisits its assessment of the amenity value of the area and Scenic Views through Bawn in the context of the demesnes designation under S482 of the Taxes Consolidation Acts.
94. Suitable protection should be afforded to the rural setting of the demesne, its lakes and woods. To this end submission recommends that the area is upgraded to “Primary Amenity Area”.

95. The views of the demesne approaching and through Bawn should be protected. In addition a further protected view is recommended (refer to map below).



96. The value of Lough Bawn demesne has not been recognised at a local level within the area. The demesne woods and lakes present an impressive landscape feature which is deserving of greater protection from inappropriate development.

Response of the Manager

1. Noted.
2. Noted.
3. Noted.
4. Noted.
5. Monaghan County Council has no proposals to provide additional social housing in Bawn.
6. Noted.
7. Noted.
8. Noted.
9. Noted.
10. Noted.
11. This statement is partially incorrect. Within the draft development plan, Bawn has been designated as a Tier 6 settlement and not a Tier 5 settlement. Section 3.4.2 of the draft development plan acknowledges that some settlements which were designated as Tier 5

in the previous county development plan experienced little or no development. As a consequence development envelopes have been removed and development which is of an appropriate size and nature in these settlements will be facilitated in order to consolidate and strengthen their role. Section 3.4.2 also clearly states that the draft development plan will continue to encourage development of an appropriate size and nature in these settlements in order to consolidate and strengthen their presence. In addition policy CPS2(iii) requires that “the development reflects the nature, scale and form of existing residential development in the settlement”.

12. Noted and agreed. Section 3.4.5 states that development in Tier 6 settlements will be restricted to single dwellings. Where housing developments are proposed in Tier 6 settlements, the onus will be upon the developer to justify the demand for the housing proposed, the development shall be centered on the focal point of the settlement, and shall be subject to the satisfactory provision of infrastructure and services. All proposals for residential development within Tier 6 settlements will be subject to Policy CSP2 which requires, amongst other criteria, that development reflects the nature, scale and form of existing development within the settlement. **To provide clarity it is recommended that final paragraph of Section 3.4.5 be amended to state “To ensure new residential development is commensurate with anticipated housing demand in Tier 5 and Tier 6 settlements, only small scale housing developments will be permitted in those settlements now designated as Tier 5, and residential development in Tier 6 settlements will *generally* be restricted to single dwellings only.”**
13. Policies CSP1 and CSP2 refer to “residential development”. This phrase refers to all forms of residential development including single housing and multiple residential units.
14. Noted.
15. The phrase “residential development” refers to all forms of development which are residential in nature including single houses and housing developments.
16. Noted and agreed. The existing sewerage treatment facility has the capacity to absorb additional development.
17. The figure of 4764 relates to the rural area as well as Tier 5 and Tier 6 settlements. In addition, it should be noted that residential development within all Tier 6 settlements must comply with Policy CSP2 criterion (i),(ii),(iii),(iv),(v) and (viii).
18. Noted.
19. Development taking place around the Tier 5 and Tier 6 settlements is expected to be limited and mainly one off housing. Where this development is proposed on a site that represents an infill / consolidation opportunity between existing development forming part of the settlement, it will be determined under the policies applicable to Tier 5 and Tier 6

settlements. Given the rural nature of these settlements it is considered inappropriate for there to be a clear demarcation between them and the surrounding rural area.

20. Those housing proposals that are not considered to represent an infill / consolidation opportunity between existing development forming part of the settlement, will be assessed under the rural housing policies.
21. The current policy structure for the Tier 5 and Tier 6 settlements is much more restrictive as the settlement envelopes have been removed and only infill / consolidation opportunities will be considered as acceptable in these settlements.
22. Noted. Section 3.1 of the draft development plan acknowledges that sufficient housing, facilities, services and infrastructure in appropriate locations are necessary to accommodating population growth.
23. Noted.
24. County Monaghan's population is dispersed throughout the rural areas with less than 30% of the population living in the urban areas. Section 3.2.1 of the draft development plan recognises that this pattern of dispersed population is very strongly established but impacts upon the growth and undermines the viability of existing towns and villages. The draft development plan recognises that the issue of urban rural balance needs to be addressed. The Settlement/Core Strategy provides a hierarchy of settlements which caters for the balanced and sustainable growth of the county while providing a range of residential units. The Settlement/Core Strategy is based on the following:
 - The promotion and development of Monaghan as a Hub town and as the main residential, retail, service and employment centre in the county.
 - The development of second and third tier towns as residential, retail, service and employment centres
 - Controlled expansion of fourth tier settlements as residential and local retail centres.
 - Careful growth management in 'rural areas under strong urban influence'
 - Sustainable development of Tier 5 and 6 settlements and the remaining rural areas.
25. Table 3.2 illustrates the aggregate comparison of town and rural areas. Paragraph 3.2.1 acknowledges that County Monaghan's population is dispersed throughout the rural areas with less than 30% of the population living in the urban areas and notes that this pattern of dispersed population is very strongly established and impacts upon the growth and undermines the viability of existing towns and villages in the county.
26. Map 3.1 of the draft development plan clearly indicates that there has been significant development pressure in the rural areas surrounding the towns and some development pressure along the N2.
27. Prior to the introduction of the Sustainable Rural Housing Guidelines for Planning Authorities in 2005 very significant levels of rural housing development had taken place

on the edges of towns and along primary transport corridors, resulting in the over development of these areas. The Guidelines emphasise the need to manage this pressure from overspill development originating in urban areas. Consequently in accordance with the requirements of the Sustainable Rural Housing Guidelines for Planning Authorities, and to ensure that development in the countryside outside the planned limits of the settlements takes place in a sustainable manner, the county has been divided into three development management zones based on different rural area types. Those areas where the greatest pressure from urban generated rural housing have been identified, and policies restricting development to rural generated housing in these areas have been put in place. A significant number of settlements from large towns to small rural focal points are evenly distributed across the county to offer alternatives to one off rural housing.

28. The purpose of the Settlement/Core Strategy is to articulate a medium to longer term quantitatively based strategy to the spatial development of County Monaghan and demonstrate that the development plans and their objectives are consistent with the national and regional development objectives set out in the National Spatial Strategy and the Regional Planning Guidelines. The Settlement/Core Strategy provides a hierarchy of settlements, which caters for balanced and sustainable growth of the County while providing a range of residential choices. A significant number of settlements from large towns to small rural focal points are evenly distributed across the county to offer alternatives to one off rural housing. The Settlement/Core Strategy is based on the following principal requirements:
 - I. The promotion and development of Monaghan as a Hub town, and as the main residential, retail, service and employment centre in the county.
 - II. The development of second and third tier towns as residential, retail, service and employment centres.
 - III. Controlled expansion of fourth tier settlements as residential and local retail centres.
 - IV. Careful growth management in 'rural areas under strong urban influence'
 - V. Sustainable development of Tier 5 and 6 settlements and the remaining rural areas.
29. Noted and agreed. Monaghan Town, Carrickmacross, Castleblayney, Ballybay and Clones are the principal settlements within the county that serve as the primary residential, employment, service and retail centres.
30. Noted and agreed.
31. The Settlement/Core Strategy is a spatial expression of population, distribution, settlement size, settlement role and settlement hierarchy which is responding to an established pattern of population distribution. The Strategy will provide a framework for the location of development and population over the 6-year life span of the development

plan and identifies potential development patterns for the different areas of the county. Existing local, regional and national policy documents have influenced the Settlement/Core Strategy. The principles of proper planning and sustainable development along with a 'plan-led' approach, are cornerstones of the Planning and Development Act 2000. The Planning and Development (Amendment) Act 2010 further reinforces this approach and the Settlement/Core Strategy is based on population targets set out in the Regional Planning Guidelines with a view to expanding Monaghan Town as a hub.

32. The Settlement/Core Strategy provides a hierarchy of settlements, which caters for the balanced and sustainable growth of the County while providing a range of residential choices. A significant number of settlements from large towns to small rural focal points are evenly distributed across the county to offer alternatives to one off rural housing.
33. County Monaghan's population is dispersed throughout the rural areas with less than 30% of the population living in the urban areas. Section 3.2.1 of the draft development plan recognises that this pattern of dispersed population is very strongly established but impacts upon the growth and undermines the viability of existing towns and villages. The draft development plan recognises that the issue of urban rural balance needs to be addressed. The majority of rural population growth has historically taken place on the edge of towns as a result of urban generated rural housing. It is anticipated that the designation of Rural Areas Under Strong Urban Influence and policies to limit the amount of housing permitted in these areas will proven the outward movement of population from the towns and encourage the development of housing in these urban areas.
34. As point 33 above.
35. The Settlement/Core Strategy provides a hierarchy of settlements, which caters for the balanced and sustainable growth of the County while providing a range of residential choices. Monaghan Town as a Tier 1 settlement will be promoted as the primary growth centre for industrial development, as a primary retail and service centre, and a strong and attractive residential centre. Monaghan will aspire to be a third-level education provider and to develop critical mass in support of its 'Hub' role as set out in the NSS. The draft development plan recognises that the issue of urban rural balance needs to be addressed. The majority of rural population growth has historically taken place on the edge of towns as a result of urban generated rural housing. It is anticipated that the designation of Rural Areas Under Strong Urban Influence and policies to limit the amount of housing permitted in these areas will proven the outward movement of population from the towns and encourage the development of housing in these urban areas.
36. County Monaghan has a traditional pattern of dispersed settlement in rural areas together with a network of towns and villages distributed throughout the county. The settlement strategy for the county will develop and strengthen the pattern of settlement in line with

the strategies and targets laid out in the NSS and the RPGs. To ensure that residential development in Tier 5 and Tier 6 settlements are directed to appropriate locations, applications for development in these settlements shall be determined under policies CSP1 and CSP2 with the exception of criteria (vi) and (vii). It is incorrect to assume that 56% of all population growth will be accommodated in the Tier 5 and Tier 6 settlements, as this allocation also includes the rural area.

37. It is considered that the consideration of Bawn as a Tier 6 in the development plan will not result in the loss of ecology surrounding Lough Bawn, given the objectives and policies in respect of ecology protection in the remainder of the development plan.
38. The Settlement/Core Strategy provides a hierarchy of settlements, which caters for the balanced and sustainable growth of the County while providing a range of residential choices.
39. Noted.
40. Noted. This issue has been acknowledged within the draft development plan. Latton has been designated as a Tier 5 settlement given the basic services it provides to its community. Bawn has been designated as a Tier 6 settlement.
41. Noted.
42. Noted. Section 3.4.4 acknowledges that the character of Tier 6 settlements mirror the rural countryside but have scattered individual houses with some clustering around one or more focal points. In addition, Section 3.4.4 notes that it is expected that the majority of development taking place in these settlements will be single dwellings.
43. Noted.
44. Any application for residential development which has been recently granted would have been subject to the policies contained within the Monaghan County Development Plan 2007-2013 which included policies for the protection of the landscape and water quality. The draft development plan acknowledges in Section 3.4.2 that the once designated Tier 5 villages experienced little or no development and therefore it was considered unnecessary to retain a settlement envelope around them.
45. Monaghan County Council has no plans to increase social housing in Bawn.
46. Noted.
47. Noted.
48. Noted.
49. The creation of a 'focal point' as highlighted within the submission reflects the function of Tier 6 settlements as indicated in paragraph 3.4.4 which states "The character of these settlements (Tier 6) mirror the rural countryside but have scattered individual houses with some clustering around one or more focal points".

50. Noted. Bawn has historically been a rural focal point at a crossroads, having a number of community facilities such as a church, a parochial hall, a handball alley, a public house and a post office in its vicinity. In 2004 local authority houses were constructed within it which further re-enforced its identity as a rural focal point. The dispersed nature of the entities at Bawn is no different than other rural focal points of this status in the remainder of the county or indeed the state. Although concerns have been raised about the protection of sensitive environments, the draft development plan contains objectives and policies in respect of ecology and habitat protection.
51. The level and range of facilities within rural focal points can vary in different locations and so it would be inappropriate to establish a threshold of facilities or services.
52. Monaghan County Council has no plans to increase social housing in Bawn. Section 3.4.4 of the draft development plan states “it is expected that the majority of development taking place in these (Tier 6) settlements will be single dwellings. In respect of housing development, the onus will be upon the developer to justify the demand for the housing proposed, and the development shall be centred on the focal point of the settlement”. In addition planning applications for residential development will be determined under policies CSP1 and CSP2 with the exception of criteria (vi) and (vii).
53. Section 3.4.4 of the draft development plan states “it is expected that the majority of development taking place in these (Tier 6) settlements will be single dwellings.” In the Rural Areas Under Strong Urban Influence, Tier 5 and Tier 6 settlements will be important in providing alternatives to one off urban generated rural housing. In the areas beyond the Rural Areas Under Strong Urban Influence, Tier 5 and Tier 6 settlements will present opportunities for locals to live in close proximity to facilities and services in these settlements.
54. The draft development plan contained objectives and policies in respect of water quality and ecology protection in the remainder of the development plan.
55. Section 14.3 in Chapter 14 clearly states “Any future development of these villages shall have regard to the established character and scale of development. Applications for development in these settlements shall be required to demonstrate that they have had regard to a sequential form of development, with preference being given to lands adjacent to the centre of the settlement over lands on the periphery.” Therefore the area over which commercial development could realistically take place is more restricted than suggested in the submission.
56. Noted.
57. Noted.
58. In designating the three categories of rural areas in the county, it was established that urban generated rural housing occurred most often within a certain radius of the main

towns. Therefore those areas experiencing pressure for this type of development were designated as Rural Areas Under Strong Urban Influence. Those areas at a greater distance for the main towns and thus less attractive for urban generated rural housing, and had stable levels of population growth and density, and with average levels of rural housing applications and rural housing densities were designated as Stronger Rural Areas. The Structurally Weak Rural Areas are those areas that have experienced population stagnation or decline, have lower population densities, have lower rural housing densities, and have lower levels of rural housing applications.

59. Noted.

60. As point 58 above.

61. Population decline is only one of a number of indicators used to designate those areas that are Structurally Weak Rural Areas. Other indicators included lower population densities, lower rural housing densities and less rural housing applications.

62. Tier 6 settlements will present opportunities for locals to live in close proximity to facilities and services in these settlements and ultimately support the retention of these facilities and services.

63. Section 3.4.4 of the draft development plan states “it is expected that the majority of development taking place in these (Tier 6) settlements will be single dwellings. In respect of housing development, the onus will be upon the developer to justify the demand for the housing proposed, and the development shall be centered on the focal point of the settlement”. The draft development plan differs from the current development plan in that the settlement envelope for Tier 6 settlements, which often included a large area zoned for the development, has been removed and development is encouraged to locate on a site that represents an infill / consolidation opportunity between existing development forming part of the settlement. The success of this new approach can only be measured following a reasonable period of implementation. It is hoped that Tier 6 settlements will present opportunities for locals to live in close proximity to facilities and services in these settlements and ultimately support the retention of these facilities and services.

64. As point 63 above.

65. Planning applications for residential development within Tier 6 settlements will be determined under policies CSP1 and CSP2 with the exception of criteria (vi) and (vii).

66. Noted.

67. The importance of wetlands is acknowledged in Section 4.8.5 of the draft development plan and with the inclusion of objective WLO1 and policy WLP2 in Chapter Four.

68. The draft development plan contains a number of objectives and policies in respect of water quality and ecology protection.

69. The Settlement/Core Strategy is a spatial expression of population, distribution, settlement size, settlement role and settlement hierarchy in the county. The Strategy will provide a framework for the location of development and population over the six year life span of the development plan and identifies potential development patterns for the different areas of the county. Existing local, regional and national policy documents have influenced the Settlement/Core Strategy. These include the provisions of the Sustainable Rural Housing Guidelines which acknowledges the dispersed pattern of development in Ireland.
70. Having regard to the provisions of the Sustainable Rural Housing Guidelines which acknowledges the dispersed pattern of development in Ireland, and also the need to ensure that development in the rural areas takes place in a sustainable manner, it is considered important that small rural focal points and villages with a certain level of facilities and services are emphasised as an alternative to one off housing in the open countryside. **Therefore for this reason it is recommended that the category of Tier 6 Settlements be retained in the development plan.**
71. As point 70 above.
72. As point 70 above.
73. Tier 6 settlements were introduced to draw a distinction between small villages (Tier 5) and rural focal points or dispersed rural communities (Tier 6). This distinction ensures that only development that is appropriate to these differing settlements takes place.
74. Section 14.3 in Chapter 14 clearly states “Any future development of these villages shall have regard to the established character and scale of development. Applications for development in these settlements shall be required to demonstrate that they have had regard to a sequential form of development, with preference being given to lands adjacent to the centre of the settlement over lands on the periphery.” In addition residential development within Tier 6 settlements must comply with Policy CSP2 save for criteria (vi) and (vii).
75. As point 70 above.
76. All residential development proposed within Tier 6 settlements will be of an appropriate size and nature to consolidate and strengthen their presence. In addition policy CSP2(iii) states that residential development within Tier 6 settlements will reflect the nature, scale and form of existing residential development in the settlement.
77. Policy CSP2(iv) states that residential development within Tier 6 settlements will represent sustainable and efficient use of existing infrastructure and services or of proposed infrastructure and services for which funding is in place. In addition CSP2(v) states that the necessary infrastructure and services for the development must be in place or can be provided at the expense of the developer.

78. Section 3.5.1 refers to Rural Areas Under Strong Urban Influence and not Stronger Rural Areas as indicated within the submission. Rural Areas Under Strong Urban Influence will remain in accordance with the requirements of the Sustainable Rural Housing Guidelines for Planning Authorities. These areas have been designated to ensure that development in the countryside takes place in a sustainable manner, which reflects the needs of the rural communities. In respect of Stronger Rural Areas, it is considered necessary to define the Structurally Weak Rural Areas of the county in accordance with the provisions of the Sustainable Rural Housing Guidelines for Planning Authorities. Stronger Rural Areas are those areas that are either not under development pressure or suffering decline. **Therefore it is recommended that Stronger Rural Areas are retained in the development plan.**
79. As point 61 above.
80. As point 58 above.
81. **It is recommended that Map 3.2 be retained as indicated in the draft development plan.**
82. Sections 3.5.1 and 3.5.2 clearly illustrate the differentiation between Rural Areas Under Strong Urban Influence and Stronger Rural Areas. In designating the three categories of rural areas in the county, it was established that urban generated rural housing occurred most often within a certain radius of the main towns. Therefore those areas experiencing pressure for this type of development were designated as Rural Areas Under Strong Urban Influence. Those areas at a greater distance from the main towns and thus less attractive for urban generated rural housing, and had stable levels of population growth and density, and with average levels of rural housing applications and rural housing densities were designated as Stronger Rural Areas.
83. It is considered that the objectives and policies within the Settlement/Core Strategy contained within the draft development plan are sufficient to meet the requirements of the Department of Environment, Community and Local Government Guidance Note on Core Strategies, the Development Plan Guidelines published by the Department, and Chapter Five of the National Spatial Strategy.
84. Policy WPP6 is general in nature and affords the promotion of riparian corridors and the prevention of any in stream working or culverting of waterways. **Therefore it is recommended that Policy WPP6 remains as it is within the draft development plan.**
85. As Bawn is a Tier 6 Settlement, there is no settlement envelope around it.
86. It is considered that Policies WPP6 and WPP12 are sufficient to address this issue.
87. It is considered that Objective BDO2 is sufficient to address this issue.
88. The legal basis for the designation of Natural Heritage Areas is provided for within The Wildlife (Amendment) Act, 2000. Such designations fall outside the remit of the draft

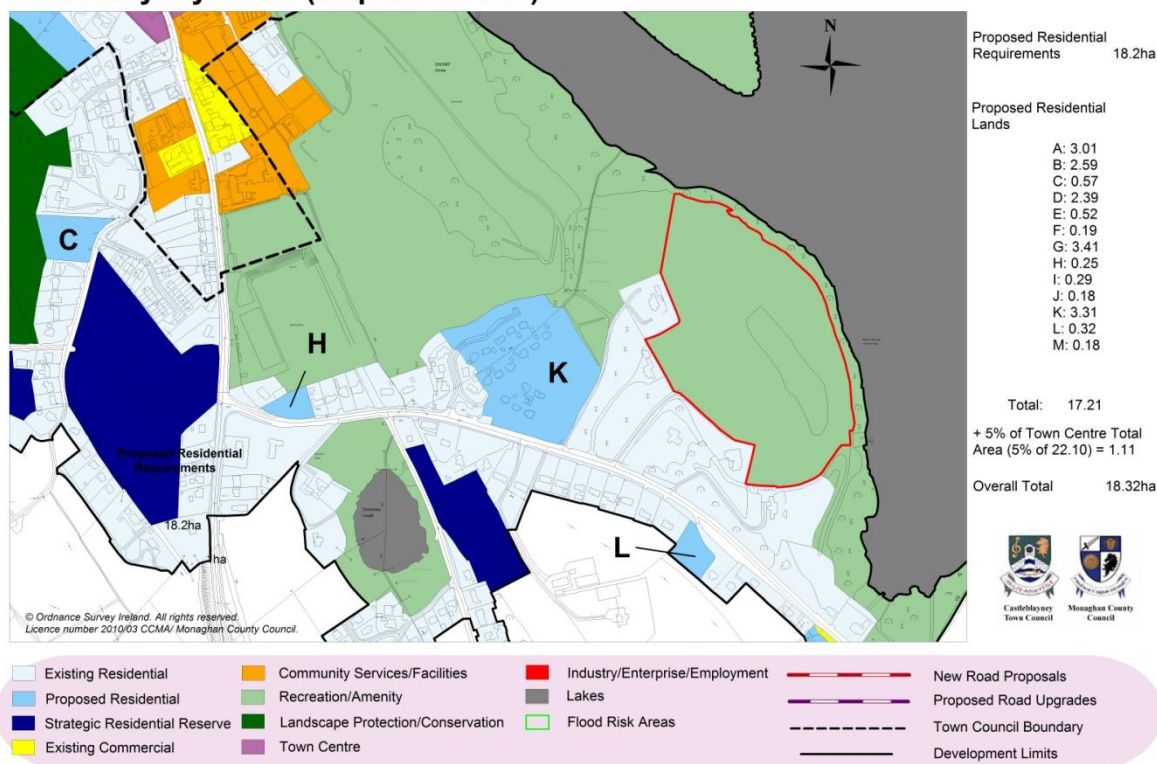
development plan. It is considered that the draft development plan affords a level of protection for biodiversity and natural heritage within the county through objectives BDO1-7. Therefore it is not considered necessary to include a specific objective with regard to Lisinsky Marsh.

89. Objectives WPO1-5 and policies WPP1-12 contained within the draft development plan provide a level of protection for water throughout the county. It is not considered necessary to include a specific objective with regard to Lisinsky Marsh and Loughbawn House Lough. The draft development plan also provides for the protection of designated sites, including NHAs and pNHAs through policy DSP2.
90. It is considered that Policies WPP6 and WPP12 are sufficient to address this issue.
91. The exclusion zone as proposed within the submission is not considered necessary. The draft development plan contains sufficient objectives and policies to afford for the protection of wetlands, ecology and water quality.
92. The exclusion zone as proposed within the submission is not considered necessary and therefore the inclusion of an additional objective WLO2 as proposed is not required.
93. It is considered that Policies AVP1 and AVP2 are sufficient to address this issue.
94. Areas of Primary Amenity Value have been designated in the draft development plan where it is considered that areas area of unique outstanding landscape quality. These areas were reassessed as part of the preparation of the draft development plan. There are no proposals to include the Bawn area with the Areas of Primary Amenity Value.
95. Views from scenic routes were reassessed as part of the preparation of the draft development plan. There are no proposals to add to the scenic routes already detailed in the draft development plan.
96. The draft development plan contains numerous objectives and policies which will afford a level of protection to the landscape, to natural heritage, habitats, trees and hedgerows, and water quality.

5.82 Submission Ref: DMCDP82
 Person/Body: Ms. Evelyn McElroy
 Location: Castleblayney - Refer to Map DMCDP82
 Core Issue: Rezoning of lands from Recreation and Amenity to Proposed Residential

Castleblayney Town (Map MDCDP82)

Draft Monaghan County Development
Plan 2013-2019



Points Raised

1. The McElroy family do not agree with the zonings proposed for their lands (The White Hill) in the draft development plan.
2. Ms. Mc Elroy wishes that the site is considered for a mixture of residential and recreational use.

Response of the Manager

1. The lands are currently zoned in the Monaghan County Development Plan 2007-2013 as Recreation and Amenity. Given that the lands bound Lough Muckno, which is an Area of Primary Amenity, and are a prominent feature along the lough shore, it is considered appropriate that these lands remain proposed as Recreation and Amenity within the draft development plan.

2. The Planning and Development (Amendment) Act 2010 required the inclusion of a Core Strategy within development plans, which dictates that lands should be zoned for residential development based on demand and sequential location. The Core Strategy incorporated within the draft County Development Plan has determined the quantum and location of residential lands required during the period of the development based on projected population growth and the sequential approach to land use zoning as stipulated in the Department of Environment, Community and Local Government Guidance Note on Core Strategies, the Development Plan Guidelines and the Sustainable Residential Development in Urban Areas Guidelines published by the Department, and Chapter Five of the National Spatial Strategy. There are a significant number of plots of land proposed to be zoned for either Proposed Residential or Strategic Residential Reserve in the southern and western portions of Castleblayney which are undeveloped. It is considered that there are a significant number of plots of land closer to the core of the settlement that are suitable for housing, and are capable of providing more than the required number of houses during the lifetime of the development plan than the subject lands. Given the requirement of the Planning and Development (Amendment) Act 2010 and the Development Plan Guidelines to ensure development takes in a sequential manner from the core of the settlement out wards, the need to maintain compact urban settlement forms, and the fact that there a significant number of plots of land closer to the core of the settlement that are suitable for housing and capable of providing more than the required number of houses during the lifetime of the development plan, it is recommended that the subject lands are not zoned for either Strategic Residential Reserve or Proposed Residential use. **For these reasons and the reason outlined in point 1 above, it is recommended that the lands remain proposed as Recreation and Amenity within the draft development plan.**

5.83 Submission Ref: DMCDP83
Person/Body: John McGahon
Location: Inniskeen
Core Issue: Residential Development in Inniskeen

Points Raised

1. Broadly welcomes the draft plan as proposed.
2. Mr. Mulligan recommends that a policy be adopted whereby multi-unit residential development in Inniskeen should reinforce the identity of the village centre and core.
3. Development should not be considered which is located on the fringes or edge of the village which leads to sprawl into the surrounding countryside.
4. Planning permission for development should not be granted for any development which cannot be considered a natural extension of the village.
5. Any lands developed should be contiguous to the village core whereby the village can develop in an organised pattern without housing estates being fastened onto the village fringes.

Response of the Manager

1. Noted.
2. Inniskeen is designated a Tier 4 settlement. Planning applications for residential development in Tier 4 settlements will be granted where the development meets criteria (i)-(viii) of Policy CSP2. Policy CPS2 (iii) states that “the development reflects the nature, scale and form of existing residential development in the settlement”.
3. Section 14.2 of the draft development plan states “development limits have been defined around Tier 4 villages to allow for appropriately scaled growth, to protect their character and to prevent ribbon development and urban sprawl in the surrounding countryside”. In addition settlement envelopes are based on the existing built footprint of the villages, with the aim of consolidating existing development.
4. As point 3 above.
5. Inniskeen is designated a Tier 4 settlement. Planning applications for residential development in Tier 4 settlements will be granted where the development meets criteria (i)-(viii) of Policy CSP2. Policy CPS2 (ii) states that “the development contributes to the sequential development of land from the centre of the settlement outwards and/or represents an infilling of the existing settlement footprint”.

5.84	Submission Ref:	DMCDP84
	Person/Body:	Environmental Protection Agency
	Location:	N/A
	Core Issue:	General submission regarding the Draft Development Plan

Points Raised

1. Consideration should be given to reviewing the adopted Sludge Management Plan (2002) as referred to in Section 6.3.3 of the draft development plan. This is to ensure that environmental legislation which has come into force since its adoption is reflected in the Plan.
2. Where a review of the Sludge Management Plan is proposed, the requirements of the SEA and Habitats Directive should in particular be taken into account.
3. Consideration should be given to amending objective FLO3 to ensure that a preliminary flood risk assessment is carried out within the lifetime of the plan to control the zoning and development of lands at a strategic level.
4. A policy requiring that a justification test be carried out in accordance with The Planning System and Flood Risk Management – Guidelines for Planning Authorities is carried out.
5. In particular Chapter 4 Flooding and Spatial Planning of the Flood Risk Management Guidelines should be fully integrated as appropriate into the Plan.
6. Zoned lands which are identified as being at significant risk of flooding (flood zones A and B) should consider alternative development/zoning options or de-zoning.
7. The Strategic Flood Risk Assessment (SFRA) should be undertaken for the County Development Plan and Town Development Plans prior to adoption and the findings of the SFRA should be reflected in the SEA and final plan.
8. Consideration should be given to including a specific policy to provide for/promote appropriate flood risk assessments to be undertaken where development(s) and zoning are being proposed in the plan area where there is a risk of flooding.
9. Clarification should be given to whether any potential significant transboundary effects have been identified and how the plan proposes to address/mitigate and manage these – this should include any potential effects on water quality, biodiversity, landscape, waste management etc.
10. Commitment should be given to including a commitment to establishing a wind/renewable energy strategy (WES/RES) for the county, to ensure that a coordinated and consistent approach is taken in the siting, design, construction and maintenance of wind energy/renewable energy.
11. The WES/RES should incorporate the Landscape Character Assessment and Biodiversity Action Plan and County Plan to ensure likely significant effects including cumulative

effects are taken into account from multiple wind energy developments and assess the capacity for absorbing particular developments into the plan. Consideration should also be given to assessing any potential transboundary effects.

12. Consideration should be given to the application of the “Precautionary Principle” in relation to policies EIP4 and EIP5 for any such proposed developments. The requirements of the Habitats Directive in particular should be fully adhered to in this regard.
13. The potential for transboundary significant effects should also be considered with regard to extractive industry.
14. Any extractive industry proposals should reflect national policy and incorporate international best practice.
15. Submission refers to the EU’s ‘Common Implementation Strategy for the Water Frameworks Directive (2000/60/EC) - Guidance Document No 20’ and in particular ‘Section 3.5 Key Issues for Article 4.7’.
16. Provisions should be included within the plan to ensure that any proposed land use zoning or development associated with the plan is not in breach of the requirements of the Water Framework Directive.
17. Policy EIP5 promotes proposals for hydraulic fracturing. Consideration should be given to establishing a non renewable energy action plan to assess the potential for likely significant effects, including cumulative and in-combination and transboundary effects and which takes account of the requirements of the Habitats, SEA, EIA and Flood Directives respectively.
18. Hydraulic fracturing as part of any commercial scale extraction of natural gas onshore is an activity licensable under the EPA Acts 1992-2011. The EPA may not issue a licence for such an activity unless they are satisfied that it will not cause significant environmental pollution. However, the exploration stage of any such onshore gas project does not require any such licence.
19. The EPA in conjunction with the DCENR and other regulators including those from Northern Ireland are currently in the initial stages of conducting research into the impact of hydrologic fracturing on the environment.
20. Policies AAP1-AAP4 contained within chapters of the draft development plan are noted. Consideration should be given to ensuring that the requirements of the SEA, EIA and Flood Directives are also implemented as relevant and appropriate.
21. Consideration should also be given to incorporating the objectives for the protection of natural heritage as relevant and appropriate. In addition the likelihood for in-combination effects should also be taken into account.

22. With regard to policies DSP1 and DSP2, consideration should also be given to the capacity for particular areas to absorb developments while ensuring the integrity of particular sites is not affected.
23. Consideration should be given to amending Map 4.6 or including a new map to highlight areas within the County with less than good water status. This is to ensure that the improvement and protection of surface and ground water quality is incorporated to a high degree in the Plan.
24. With regard to the Tier 4 Settlement Maps, where the risk of flooding has been or will be identified upon completion of the Flood Risk Assessment, it should be ensured that in the zoning and development of lands, that development is appropriate to the risk of flooding identified.
25. With regard to the Tier 4 Settlements consideration should be given to re-zoning/de-zoning areas at risk of flooding to more appropriate land uses.
26. The European Communities (Birds and Natural Habitats) Regulations 2011, (S.I. No. 477 of 2011) should be included within subsection 1.4.6 of the draft plan.
27. Consideration should be given to including a summary of the role of the Regional Planning Authorities and requirements of Local Authorities to ensure consistence with the Regional Planning Guidelines.
28. Section 1.8.2 Guidelines and Circulars issued by the Minister should include a reference to the SEA Circular PSSP6/2011.
29. With regard to the strategic aims of the five Monaghan Local Authorities, consideration should be given to amending the first bullet point on page 26 as follows “*Sustainably* develop the potential of each part of the County in economic, social and environmental terms”.
30. Consideration should be given to highlighting how much re-zoning, de-zoning and phasing of lands are proposed for each development plan for the specified settlements described.
31. It should also be clarified whether consideration has been given to re-zoning or de-zoning lands at risk of flooding or those adjacent to Natura 2000 sites to ensure significant effects are avoided.
32. It should be ensured that the nature and extent of zoned lands within the county plan and the associated town plans reflect the medium to long term sustainable development of the county. Where excessive lands area zoned priority should be given to ensuring suitable dezoning, rezoning to support the principle of sustainable development.
33. With regard to policy CSP2, the requirements of the Flood Risk Management Guidelines should also be fully implemented as appropriate.

34. Section 3.5 Housing in Rural Areas should also make reference for the need for adequate and appropriate critical service infrastructure provision.
35. The Code of Practice: Wastewater Treatment and Disposal Systems serving Single Houses (EPA 2009) should be referred to in Section 3.5.
36. Objective HPO1 is acknowledged.
37. The intention to audit geological heritage sites is noted.
38. There would be merits in clarifying whether proposals for designating certain geological sites upon completion of this audit are to be considered.
39. It is noted that the plan also provides for the protection of sensitive landscapes and significant landscape character areas.
40. Consideration should be given to further strengthening Policy WLP1 as follows “Development that would destroy, fragment and degrade wetlands ~~will be resisted~~ will not be permitted”. The potential for transboundary, cumulative and in-combination effects in particular should be taken into account and appropriately assessed prior to permission for development being granted.
41. Consideration should be given to strengthening Policy AAP2 as follows “The Planning Authority ~~shall have regard to~~ *shall fully implement where relevant*, the DEHLG guidance Appropriate Assessment of Plans and Projects in Ireland (2009) and any subsequent versions, when assessing plans and projects likely to have significant effects on a Natura 2000 site.”
42. In section 4.9.2 Surface Water Quality, consideration should be given to including maps showing the surface and groundwater quality presented in the Northwest and Neagh Bann River Basin Management Plans.
43. In section 4.9.4, reference should be made to the Programmes of Measures for the North Western and Neagh Bann River Basin District Management Plans.
44. Section 4.9.6 Developments in un-sewered areas should refer to the requirements of the Code of Practice: Wastewater Treatment and Disposal Systems Serving Houses, and ensure that unless appropriate infrastructure is established, development should not be permitted.
45. Reference is made to the EU’s Common Implementation Strategy for the Water Framework Directive (2000/60/EC) – Guidance Document No. 20, particularly Section 3.5. Provisions should be included in the plan to ensure that any proposed land use zoning or development associated with the plan is not in breach of the requirements of the Water Framework Directive.
46. Policy WPP10 should be amended as follows “Development within the vicinity of groundwater or surface water dependent Natura 2000 sites will not be permitted where there is potential for a likely significant impact upon the groundwater or surface water

supply to the Natura 2000 site. Where appropriate, the application will be ~~requested~~ required to demonstrate with hydrogeological evidence that the proposed development will not adversely affect the quality or quantity of groundwater or surface water supply to the Natura 2000 site”.

47. Consideration should be given to amending objective CCO1 as follows “To ~~have regard to~~ implement where relevant and appropriate, the National Climate Change Strategy 2007-2012 and any subsequent strategies”.
48. The intention in TRO11 to prepare a Land Use Transportation Plan for the county is noted. The requirements of the SEA, Habitats and Floods Directives should be taken into account in this regard.
49. It is noted that a number of drinking water supplies are on the EPA’s Remedial Action List – Carrickmacross, Clones, Lough Egish. In addition six wastewater treatment plants are currently listed as “failing to meet the overall requirements of the Urban Waste Water Regulations 2001”. It should be ensured that appropriate mitigation and management measures are established to provided and maintain an adequate and appropriate critical service infrastructure in implementing the Plan.
50. Consideration should be given to amending the second bullet on page 179 as follows “Development of adequate and appropriate infrastructure to support the existing towns and accommodate future growth within the towns, in a sustainable manner”.
51. It is noted in Section 8.3.10 Zoning Objective J – LAAP, that there are significant areas of lands within or close to the centre of the towns which offer significant development potential but are likely to remain undeveloped. There would be merit in re-zoning these to strategic land reserve and investigating the establishment of theses LAAPs during more favourable economic conditions.
52. LAAPs should take into account the requirements of the SEA, Habitats and Floods Directive.
53. Consideration should be given to amending objective IEO4 as follows “encourage and promote the *sustainable* development of industry within the towns over the plan period”.
54. In section 8.11, a stronger commitment to protecting designated sites, habitats and species should be given in objective SNO5.
55. The intention to encourage and accommodate the reopening of the Ulster Canal in objective STO4 is acknowledged. The requirements of the EIA, Habitats, Water Framework and SEA Directives should be integrated as appropriate.
56. Consideration should be given in each specific Town Development Plan for the inclusion of a specific policy which seeks to ensure that the development of each town will not conflict with the policies of the plan and which promotes sustainable development and is consistent with the Regional Planning Guidelines and Core Strategy implementation.

57. A description of the amount of zoning, de-zoning, rezoning and phasing of lands should be provided within Chapters 9 to Chapter 13.
58. Areas which are at risk of flooding should be identified within Chapters 9-13 and taken into account.
59. In developing particular village settlements, the potential for likely significant effects including cumulative and in-combination effects should be taken into account.
60. The nature and scale of proposed development within individual villages should reflect the ability of existing infrastructure to accommodate these proposals.
61. Chapter 14 should avoid ribbon development scenarios and also reflect a core strategy approach where possible.
62. The requirements of the Habitats, SEA and Floods Directives should be taken into account for these settlements also.
63. Consideration should be given to including or referring to Policy ETP2 – requirements of the EPA Code of Practice Wastewater Treatment and Disposal Systems Serving Single Houses into Chapter 6 Infrastructure and Services.
64. Consideration should be given to amending INP7 as follows “industrial development shall not ~~generally~~ be permitted in Primary or Secondary Amenity, Special Protection Areas, Special Areas of Conservation, in natural heritage areas....”
65. Consideration should be given to amending objectives TOO4 as follows “Support sustainable agri-tourism...”
66. Consideration should be given to amending objectives TOO6 as follows “facilitate sustainable infrastructure for marine related activities such as boating, angling and canal cruising at appropriate locations....”
67. Considerations should be given to providing a plan lead approach to the inclusion of green infrastructure taking into account publications on green infrastructure at the following websites:-:
 - www.irishlandscapeinstitute.com
 - www.uep.ie
 - www.eea.europe.eu
 - www.comharsdc.ie
68. The plan should refer to the requirement under The Waste Water Discharge (Authorisation) Regulations for all wastewater discharges, including storm water discharges which come within the scope of these Regulations to be licensed. The EPA is currently in the process of licensing discharges from wastewater treatment facilities.
69. The Plan should highlight that under the EIA and Planning Development Regulations certain projects that may arise during the implementation of the plan may require an Environmental Impact Assessment.

70. There are also requirements with regard to EIA for sub-threshold development and the following publications should be referred to:-
- Guidance on Information to be contained in Environmental Impact Statements (EPA, 2002)
 - Advice Notes on Current Practice in the preparation of Environmental Impact Statements (EPA, 2003)
71. Reference is made to the Environmental Impact Assessment (EIA) Guidance for consent authorities regarding sub threshold development (DEHLG, 2003).
72. Projects will also be required to be screened with respect to the requirement for Habitats Directive Assessment/Appropriate Assessment as required by Article 6 of the Habitats Directive.
73. Refer to the document entitled “Appropriate Assessment of plans and projects in Ireland”. (DOEHLG, 2009)
74. Consideration should be given to the inclusion of a specific policy/objective in the plan to ensure full compliance with the requirements of Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment. The SEA Directive and the associated Planning and the associated Planning and Development (Strategic Environmental Assessment) Regulations, 2004.
75. The new SEA Regulations which should be referenced and integrated into the Plan and SEA process.
76. Refer to DoECLG Circular PSSP 6/2011 in relation to ‘Further Transposition of the EU Directive 2001/42 on Strategic Environmental Assessment’ which should be referred to and integrated into the plan.
77. Monaghan Local Authorities need to be cognisant of their responsibilities with respect to the SEA Directive and related SEA Regulations through the plan.
78. The plan should promote the development and implementation of procedures to ensure compliance with the requirement of the SEA Directive and related SEA Regulations for all Land Use plans within the Plan area.
79. The inclusion of Table 32 Incorporation of Environmental Issues into the Draft Development Plan is acknowledged.
80. Map 4 Sensitive Surface Waters is noted. However no spatial data is provided on the water quality status under the EPA and WFD classifications. Consideration should be given to highlighting on a map, areas of particularly poor water quality. This should be inserted within the Non Technical Summary.
81. Consideration should be given to including a map highlighting the areas at risk of significant flood risk or recurring flooding within the county. This should be inserted within the Non Technical Summary.

82. Consideration should be given to amending the first bullet point of Section 3.2 Monaghan County Development Plan Vision Statement as follows “Develop *in a sustainable manner*, the potential of each part of the County in economic, social and environmental terms”.
83. Section 3.3.4 Border Regional Planning Guidelines 2010-2022 should also consider inclusion of a reference to the role of the Regional Planning Authority and also key aspects of Core Strategy implementation to be carried out in the plan.
84. There would be merits in Section 4 Appropriate Assessment to make reference to any zoning/re-zoning carried out and any buffer zone provision following on from the Stage 2 conclusion.
85. Chapter 6 Current State of the Environment is noted.
86. Consideration should be given to including water quality status maps for the plan from the Neagh Bann and North West River Basin Management Plans to provide a spatial context to water quality within the County.
87. Consideration should be given to including a map showing the EPA classification of water quality within the plan area. It is noted that the Blackwater River, Dundonagh Stream and Clontibret Stream were identified as being of Poor Status Q3 of 2010. The WFD Classification also highlights surface waters including the River Blackwater and River Erne as being of Poor Status in 2011.
88. There would be merits in including a cumulative sensitivity/vulnerability map for the plan area, outlining areas of overlapping sensitivity which may have greater potential for significant cumulative effects to be afforded significant protection in implementing the plan.
89. Significant environmental pressures as presented in Section 7 are noted. Consideration should be given to including Table 27 within the Non Technical Summary.
90. Consideration should be given to reviewing Section 8 Flood Risk Assessment to providing a map highlighting the recurring flood risk areas within the County identified by the OPW.
91. Chapter 4 of the Flooding and Spatial Planning of The Planning System and Flood Risk Management Guidelines for Planning Authorities should be fully integrated within the plan.
92. Consideration should be given to including a table showing how the assessment of the alternative development scenarios against the environmental issues listed in Schedule 2B(f) of S.I. No. 436 of 2004 to ensure a consistent approach was taken in determining a preferred development scenario. This should be reflected in the selection of the preferred development scenario.
93. Clarify how the full range of environmental effects of the implementation of the plan as set out in the SEA Directive and Regulations i.e. “secondary, cumulative, synergistic, short, medium and long-term, permanent and temporary, positive and negative effects” have been assessed and documented.

94. The potential for cumulative effects in combination with other relevant Plans/Programmes and Projects is highlighted.
95. Clarification should be given as to whether any potential significant transboundary effects have been identified and how the plan proposes to address/mitigate and manage these – this should include any potential effects on water quality, biodiversity, landscape etc.
96. There would be merit in providing a summary table outlining how each significant effect is linked directly to relevant mitigation measures, monitoring measures and where appropriate a specific policy or objective in the plan.
97. Mitigation measures should be included for all likely significant effects. The assessment of aims, policies and objectives as provided in Table 31 is noted. Where conflicts have been identified with Environmental Protection Objectives, it should be ensured that adequate and appropriate mitigation measures are provided to address these.
98. Consideration should be given to the following:
 - The inclusion of monitoring frequencies
 - Monitoring of both positive and negative effects where they occur
 - Inclusion of the on-going review of environmental targets and indicators in the monitoring programme. Responsibility for this role should be clearly identified.
99. The monitoring programme should be flexible to take account of specific environmental issues as they arise and should be able to capture the possibility of cumulative effects.
100. While the monitoring programme sets out the various sources of data, the actual departments responsible for collecting, collating and analyzing the data should be identified as soon as possible after the plan has been adopted.
101. The monitoring programme should include information on how the monitoring proposed will allow unforeseen adverse effects to be identified and responded to as appropriate. Issues such as responsibility and appropriate remedial action should be addressed.

Response of the Manager

1. Noted.
2. Noted and agreed.
3. A Strategic Flood Risk Assessment is currently being carried for County Monaghan. In the interim, the suitability of lands for development having regard to flood risk, has been determined using preliminary information obtained from historic flood maps, information from the Office of Public Works, contour mapping and LIDAR information, site inspections, and assessment by County Council engineers. In addition the principles set out in the Department of Environment, Heritage and Local Government Guidelines “The Planning System and Flood Risk Management (2009)” have also been applied. This has resulted in the adoption of a precautionary approach being applied to lands which either

are currently at risk of flooding or could be at risk of flooding in the future, where they have been excluded from development or restricted to development of a type that has a low vulnerability to flooding or is water compatible. The completed Strategic Flood Risk Assessment for the County will be factored into the statutory two year review of the development plan in 2015 and any necessary changes to the development plan will be progressed by way of variation.

4. Objective FLO2 in Chapter Six of the draft development plan states it is an objective to “implement the DEHLG “The Planning System and Flood Risk Management Guidelines” and apply the sequential approach and justification test detailed in the document when considering development proposals”.
5. Objective FLO2 in Chapter Six of the draft development plan states it is an objective to “implement the DEHLG “The Planning System and Flood Risk Management Guidelines” and apply the sequential approach and justification test detailed in the document when considering development proposals”.
6. The suitability of lands for development having regard to flood risk, has been determined using preliminary information obtained from historic flood maps, information from the Office of Public Works, contour mapping and LIDAR information, site inspections, and assessment by County Council engineers. In addition the principles set out in the Department of Environment, Heritage and Local Government Guidelines “The Planning System and Flood Risk Management (2009)” have also been applied. This has resulted in the adoption of a precautionary approach being applied to lands which either are currently at risk of flooding or could be at risk of flooding in the future, where they have been excluded from development or restricted to development of a type that has a low vulnerability to flooding or is water compatible. The completed Strategic Flood Risk Assessment for the County will be factored into the statutory two year review of the development plan in 2015 and any necessary changes to the development plan will be progressed by way of variation.
7. As point 3 above.
8. **It is recommended that Policy FLP 3 be inserted in Section 6.4 stating “*Development in areas at risk of flooding or that have the potential to cause/exacerbate flooding elsewhere, will only be permitted where it has been demonstrated to the satisfaction of the planning authority that the development is in accordance with the principles set out in Section 8.4.6 of the Monaghan County Development Plan 2013-2019 and the provisions set out in the Department of Environment, Heritage and Local Government Guidelines The Planning System and Flood Risk Management (2009). In all cases the onus will be on the developer to***

provide justification for the development in accordance with the provisions of these guidelines”

9. It has been determined that the objectives, policies and land use zonings contained within the draft Monaghan County Development Plan 2013-2019 do not have the potential for significant transboundary effects.
10. Objective ERO4 in Chapter Five of the draft development plan states “promote a ‘plan-led’ approach by identifying areas where there is significant wind energy potential, having regard to the Landscape Character Assessment for County Monaghan, through a landscape sensitivity analysis during the life of this plan”.
11. Noted and agreed.
12. It is considered that Policy EIP4 is adequate to address this issue. **However, it is recommended that Policy EIP5 should be amended to state “Proposals involving hydraulic fracturing shall ~~only~~ not be permitted ~~where~~ unless it has been demonstrated to the satisfaction of the planning authority that it will not have an adverse impact upon the environment.**
13. Noted.
14. It is considered that Policies EIP2 and EIP3 sufficiently address this issue.
15. Noted.
16. Objective WPO5 of the draft development plan states “Achieve ‘good status’ in waterbodies and prevent deterioration of existing water quality status in all waterbodies in accordance with the Water Framework Directive”.
17. It is not considered that there is a requirement for a non renewable energy action plan specific for County Monaghan and that an action plan at regional level is considered the more appropriate.
18. Noted.
19. Noted.
20. The requirements of the Strategic Environmental Assessment Directive have already been incorporated into the development plan making process and an Environmental Report was published simultaneously with the draft development plan. The principles of the Floods Directive have also been incorporated within the draft development plan. The requirement to carry out an Environmental Impact Assessment in respect of certain developments has been referenced in the draft development plan in a number of instances.
21. The objectives and policies for the protection of natural heritage are contained within Chapter Four of the draft development plan are considered sufficient to address this issue.
22. **It is recommended that policies DSP1 and DSP2 are amended as follows:**

- **DSP1 “Strictly protect areas designated or proposed to be designated or proposed to be designated as Natura 2000 sites (listed in Appendix 4). Development within or adjacent to these areas will only be permitted where it has been clearly demonstrated to the satisfaction of the planning authority that such development will have no significant adverse effects on the conservation objectives *or integrity* of these sites in accordance with the Habitats Directive”.**
 - **DSP2 “Protect the NHA and pNHAs, listed in Appendix 4 by resisting development which would detrimentally impact on the conservation status *or integrity* of these sites. Development in these areas will only be permitted where it has been clearly demonstrated to the satisfaction of the planning authority that any such development will have no significant adverse effects *on the integrity of these sites*”.**
23. Maps indicating the status of surface waters (lakes and rivers) in the county are detailed in the River Basin Management Plans.
 24. The suitability of lands in Tier 4 settlements for development having regard to flood risk, has been determined using preliminary information obtained from historic flood maps, information from the Office of Public Works, contour mapping and LIDAR information, site inspections, and assessment by County Council engineers. This has resulted in the adoption of a precautionary approach being applied to lands which either are currently at risk of flooding or could be at risk of flooding in the future, where they have been excluded from development or have been zoned Landscape Protection/Conservation.
 25. As point 24 above.
 26. **It is recommended that Section 1.4.6 of the draft plan be amended to mention The European Communities (Birds and Natural Habitats) Regulations 2011, (S.I. No. 477 of 2011) in the first paragraph.**
 27. Section 1.5 of the development plan refers to the Regional Planning Guidelines and indicates that Section 27 of the Planning and Development Act 2000 (as amended), requires that local authority development plans must be consistent with the regional planning guidelines in force for its area.
 28. **It is recommended that SEA Circular PSSP6/2011 be included in Section 1.8.2 - Guidelines and Circulars issued by the Minister.**
 29. **Noted. It is recommended that the first bullet point on page 26 is amended to state “*sustainably* develop the potential of each part of the County in economic, social and environmental terms”.**
 30. The amount of current residential zoned land is set out in the Core Strategy adopted as variation No.19 of the Monaghan County Development 2007-2013, and for this reason it is not considered appropriate to set out this information in the draft plan.

31. The suitability of lands for development having regard to flood risk, has been determined using preliminary information obtained from historic flood maps, information from the Office of Public Works, contour mapping and LIDAR information, site inspections, and assessment by County Council engineers. In addition the principles set out in the Department of Environment, Heritage and Local Government Guidelines “The Planning System and Flood Risk Management (2009)” have also been applied. This has resulted in the adoption of a precautionary approach being applied to lands which either are currently at risk of flooding or could be at risk of flooding in the future, where they have been excluded from development or restricted to development of a type that has a low vulnerability to flooding or is water compatible. County Monaghan has two Natura 2000 sites, however only Kilroosky Lough Cluster SAC is located within close proximity to zoned land (Clones Town). Although Ramages Lough which is part of Kilroosky Lough Cluster SAC is included within the settlement envelope of Clones Town in the current development plan, the draft development no longer includes it within the settlement envelope. In addition, Policy WPP10 has been inserted within the draft development plan to ensure that development will not be permitted where there is a potential for a likely significant impact upon the groundwater or surface water supply to the Natura 2000 site. In The policy states that the applicant will be requested to demonstrate with hydrological evidence that the proposed development will not affect the Natura 2000 site. Slieve Beagh SPA is not located within proximity to any lands which are zoned for development.
32. The purpose of the Settlement/Core Strategy is to articulate a medium to longer term quantitatively based strategy to the spatial development of the County. The Settlement/Core Strategy has been developed in line with the Planning and Development (Amendment) Act 2010 which ensures that zoned residential land is commensurate with population growth. Section 3.4.8 of the draft development plan acknowledges that the workings of the Settlement/Core Strategy will require a ‘monitor and manage’ approach to ensure sufficient supply of residential land to meet housing demand during the period of the development plan. In addition the review of the County Development Plan in 2015 will specifically reassess the status and amount of zoned residential land having regard to housing demand.
33. Criteria (viii) of policy CSP2 states that “development meets the requirements of the remaining relevant policies within the development plan”. In this regard, policies FLP1-3 with regard to flooding will apply. **However, for clarity, it is recommended that a statement in the preface and Section 1.8.4 stating that “*The objectives and policies set out in this document must be read together and not in isolation when considering development proposals within the functional areas that make up*”**

County Monaghan Local Authorities” should be included within the development plan.

34. Section 3.5 of the Core Strategy indicates those rural areas that are experiencing development pressure in the form of rural housing, and facilitates categorisation of those areas where the capacity for rural housing is limited and those areas that have capacity for rural housing. Infrastructure provision is addressed in Chapter Six of the draft plan. **However, for clarity, it is recommended that a statement in the preface and Section 1.8.4 stating that “*The objectives and policies set out in this document must be read together and not in isolation when considering development proposals within the functional areas that make up County Monaghan Local Authorities*” should be included within the development plan.**
35. Section 3.5 of the Core Strategy indicates those rural areas that are experiencing development pressure in the form of rural housing, and facilitates categorisation of those areas where the capacity for rural housing is limited and those areas that have capacity for rural housing. Policy ETP2 sufficiently addresses this issue. **However, for clarity, it is recommended that a statement in the preface and Section 1.8.4 stating that “*The objectives and policies set out in this document must be read together and not in isolation when considering development proposals within the functional areas that make up County Monaghan Local Authorities*” should be included within the development plan.**
36. Noted.
37. Noted.
38. **It is recommended that Objective GH01 is amended to state “To undertake an audit of geological heritage sites within County Monaghan during the lifetime of the plan where resources permit, and accordingly where appropriate recommend to the Department of Arts, Heritage and the Gaeltacht geological heritage sites for designation”.**
39. Noted.
40. It is considered that Policy WLP1 offers a sufficient level of protection for wetlands. The potential for transboundary, cumulative and in-combination effects in particular shall be taken into account and appropriately assessed when assessing applications for development.
41. **It is recommended that Policy AAP2 be amended to state “The Planning Authority ~~shall have regard to~~ shall fully implement where relevant, the DEHLG guidance Appropriate Assessment of Plans and Projects in Ireland (2009) and any subsequent versions, when assessing plans and projects likely to have significant effects on a Natura 2000 site.”**

42. As point 23 above.

43. It is recommended that the programme of measures set out in the North Western and the Neagh Bann River Basin Management Plans be included in Section 4.9.4 of the draft plan. The relevant measures are as follows:-

- Control of urban waste water discharges
- Control of unsewered waste water discharges
- Control of agricultural sources of pollution
- Water pricing policy
- Control of environmental impacts from forestry
- National Action Plan for sustainable use of pesticides
- Landfills and contaminated lands
- Aquaculture
- Invasive alien species
- Peat extraction

44. It is not considered necessary to make reference to Code of Practice: Wastewater Treatment and Disposal Systems Serving Houses in Section 4.9.6 given that it is detailed in Policy ETP2 in Chapter 15, and all developments must be assessed against all relevant objectives and policies contained within the County Development Plan. **However, for clarity, it is recommended that a statement in the preface and Section 1.8.4 stating that “*The objectives and policies set out in this document must be read together and not in isolation when considering development proposals within the functional areas that make up County Monaghan Local Authorities*” should be included within the development plan.**

45. There are a number of objectives and policies within the draft plan which seek to protect the integrity of water bodies such as Objective WPO4 which seeks to protect water bodies and maintain them in a state suitable for habitats, and Objective WPO5 which aims to “achieve ‘good status’ in waterbodies and prevent deterioration of existing water quality status in all waterbodies in accordance with the Water Framework Directive”.

46. It is recommended that Policy WPP10 be amended to state “Development within the vicinity of ground water or surface water dependent Natura 2000 sites (ie. Kilroosky Lough Cluster SAC) will not be permitted where there is potential for a likely significant impact upon the groundwater or surface water supply to the Natura 2000 site. Where appropriate, the application will be ~~requested~~ required to demonstrate with hydrogeological evidence, that the proposed development will not adversely affect the quality or quantity of groundwater or surface water supply to the Natura 2000 site”.

47. It is recommended that Objective CCO1 be amended to state “~~To have regard to~~ ***implement where relevant and appropriate, the National Climate Change Strategy 2007-2012 and any subsequent strategies***”.
48. Noted.
49. Table 6.7 in Chapter Six sets out the design capacity and current loading on the public waste water treatment works in the county and any proposals for improvements to them. In addition, Policy WTP1 explicitly states that development proposing to connect to the public waste water treatment system will be restricted where there is insufficient capacity.
50. It is recommended to address future sustainable development in towns, that the second bullet on page 179 be amended to state “***Development of adequate and appropriate infrastructure to support the existing towns and accommodate future growth within the towns, in a sustainable manner***”.
51. As the lands which are the subject of Local Area Action Plans are located in the town centre, their designation as Strategic Residential Reserve would prevent their development until after the majority of the lands Proposed Residential have been developed. This would not be appropriate in these town centre locations.
52. Noted.
53. It is recommended that Objective IEO4 in Chapter Five be amended to state “***encourage and promote the sustainable development of industry within the towns over the plan period***”.
54. Section 8.11.1 of the draft development plan states that policies for the protection of heritage in the towns are provided in Chapter 4 Environment and Heritage, in addition to objectives SNO1-SNO5,
55. Noted.
56. The town development plans form part of the County Development Plan and the objectives and policies in Chapters 1-8, 15 and 16 are applicable. However, for clarity, it is recommended that a statement in the preface and Section 1.8.4 stating that “***The objectives and policies set out in this document must be read together and not in isolation when considering development proposals within the functional areas that make up County Monaghan Local Authorities***” should be included within the development plan.
57. The amount of current residential zoned land is set out in the Core Strategy adopted as variation No.19 of the Monaghan County Development 2007-2013, and for this reason it is not considered appropriate to set out this information in the draft plan. The Settlement/Core Strategy in Chapter Three indicates the amount of land proposed to be zoned for residential use in the Tier 1, 2, 3 and 4 settlements. The maps associated with Chapters 9-13 indicate the proposed housing requirement allocated for each town and

further states the size and total of proposed residential lands for each town. These maps also set out the remaining land use zonings in these settlements.

58. The majority of the areas at risk of flooding are zoned within the settlements as Landscape Protection/Conservation. The remaining areas, which are generally in strategic locations, and are zoned for other land uses, are clearly indicated as being at risk of flooding. Section 8.4.6 of the draft development plan provides information regarding development in areas with potential flood risk. In addition, Chapter Six contains objectives and policies in respect of flooding.
59. Noted.
60. Table 6.7 in Chapter Six sets out the design capacity and current loading on the public waste water treatment works in the county and any proposals for improvements to them. In addition, Policy WTP1 explicitly states that development proposing to connect to the public waste water treatment system will be restricted where there is insufficient capacity. With regard to Tier 4 villages, Section 14.2 states “Within the development limits of these villages, the planning authority will normally grant planning permission for appropriate development proposals that are in keeping with the size and character of the settlement, can be accessed and serviced satisfactorily and are appropriate in terms of use”. In addition with regard to Tier 5 villages, Section 14.3 of the draft development plan states “Any future development of these villages shall have regard to the established character and scale of development”.
61. Policy CSP2 states that development in Tier 4, Tier 5 and Tier 6 settlements should contribute to the sequential development of land from the centre of the settlement outwards and/or represent infilling of the existing settlement footprint.
62. Noted.
63. It is not considered necessary to make reference to Policy ETP2 in Chapter Six given that developments must be assessed against all relevant objectives and policies contained within the County Development Plan. **However, for clarity, it is recommended that a statement in the preface and Section 1.8.4 stating that “*The objectives and policies set out in this document must be read together and not in isolation when considering development proposals within the functional areas that make up County Monaghan Local Authorities*” should be included within the development plan.**
64. It is considered that Policy INP7 offers sufficient protection to Areas of Primary or Secondary Amenity, Special Protection Areas, Special Areas of Conservation, in natural heritage areas, in Architectural Conservation Areas, or on or near Protected Structures or Monuments from inappropriate industrial development.

65. It is recommended that Objective TOO4 in Chapter 5 be amended to state “Support *sustainable* agri-tourism in the form of on-farm visitor accommodation and supplementary activities such as health farms, heritage and nature trails, off road routes for walking and cycling, pony trekking and boating; ensuring that all built elements are appropriately designed and satisfactorily assimilated into the landscape.”
66. It is recommended that Objective TOO6 in Chapter 5 be amended to state “Facilitate *sustainable* infrastructure for marine related activities such as boating, angling, and canal cruising *at appropriate locations*. Such developments must be consistent with the natural and recreational value of the water body and any heritage designation.”
67. Noted. Monaghan Local Authorities recognise the importance of Green Infrastructure and have inserted Objectives GIO1-3 and Policy GIP1 accordingly. Section 4.10 of the draft development plan details proposals for green infrastructure strategy.
68. It is recommended that the requirement under The Waste Water Discharge (Authorisation) Regulations for all wastewater discharges, including storm water discharges which come within the scope of these Regulations to be licensed be inserted into Section 4.9.5 of the development plan.
69. The prescribed classes of development which require an Environmental Impact Assessment are set out in Schedule 5 of the Planning and Development Regulations, 2001. It is a legal requirement to undertake an Environmental Impact Assessment for certain developments. The requirement to carry out an Environmental Impact Assessment in respect of certain developments has been referenced in the draft development plan in a number of instances.
70. Schedule 7 of the Planning and Development Regulations, 2001 includes the criteria for determining whether a development would or would not be likely to have significant effects on the environment. The requirement to carry out an Environmental Impact Assessment in respect of certain developments has been referenced in the draft development plan in a number of instances.
71. Noted.
72. Section 4.8.8 of the draft development plan and in particular objective AAO1 and policies AAP1-AAP5 specifically address this issue.
73. Noted.
74. The requirements of the Strategic Environmental Assessment Directive have already been incorporated into the development plan making process and an Environmental Report was published simultaneously with the draft development plan.
75. As point 74 above.

76. As point 74 above.
77. Noted and agreed.
78. There is a legal obligation upon the local authority to ensure that the requirements of SEA Directive and related SEA Regulations are applied in respect of all Land Use plans within the Plan area.
79. Noted.
80. Maps indicating the status of surface waters (lakes and rivers) in the county are detailed in the River Basin Management Plans.
81. A Strategic Flood Risk Assessment is currently being carried for County Monaghan. In the interim, the suitability of lands for development having regard to flood risk, has been determined using preliminary information obtained from historic flood maps, information from the Office of Public Works, contour mapping and LIDAR information, site inspections, and assessment by County Council engineers. In addition the principles set out in the Department of Environment, Heritage and Local Government Guidelines "The Planning System and Flood Risk Management (2009)" have also been applied. This has resulted in the adoption of a precautionary approach being applied to lands which either are currently at risk of flooding or could be at risk of flooding in the future, where they have been excluded from development or restricted to development of a type that has a low vulnerability to flooding or is water compatible. The completed Strategic Flood Risk Assessment for the County will be factored into the statutory two year review of the development plan in 2015 and any necessary changes to the development plan will be progressed by way of variation.
- 82. It is recommended that the first bullet point on page 26 is amended to state "*sustainably develop the potential of each part of the County in economic, social and environmental terms*".**
83. Section 1.5 of the development plan refers to the Regional Planning Guidelines and indicates that Section 27 of the Planning and Development Act 2000 (as amended), requires that local authority development plans must be consistent with the regional planning guidelines in force for its area.
84. County Monaghan has two Natura 2000 sites, however only Kilroosky Lough Cluster SAC is located within close proximity to zoned land (Clones Town). Although Ramages Lough which is part of Kilroosky Lough Cluster SAC is included within the settlement envelop of Clones Town in the current development plan, the draft development no longer includes it within the settlement envelope. In addition, Policy WPP10 has been inserted within the draft development plan to ensure that development will not be permitted where there is a potential for a likely significant impact upon the groundwater or surface water supply to the Natura 2000 site. The policy states that the applicant will be requested to demonstrate

with hydrological evidence that the proposed development will not affect the Natura 2000 site. Slieve Beagh SPA is not located within proximity to any lands which are zoned for development. The issue raised is dealt with in the Natura Impact Report. Therefore it is not necessary to amend Section Four of the Environmental Report.

85. Noted.

86. As point 80 above.

87. As point 80 above.

88. It is considered that the creation of a map containing all the information set out in Maps 4.1, 4.2, 4.3, 4.4, 4.5 and 4.6 would be difficult to read given the number of layers of information that would be over laid on it.

89. Table 27 is already contained within the Non Technical Summary.

90. As point 81 above.

91. Noted and agreed.

92. It is recommended that a table showing how the assessment of the alternative development scenarios against the environmental issues listed in Schedule 2B(f) of S.I. No. 436 of 2004 has been inserted into the Environmental Report.

93. It is considered that the full range of environmental effects of the implementation of the plan were taken into consideration when compiling Table 31 of the Environmental Report.

94. The potential for cumulative effects in combination with other relevant Plans/Programmes and Projects has been taken into account in the Environmental Report.

95. It has been determined that the objectives, policies and land use zonings contained within the draft Monaghan County Development Plan 2013-2019 do not have the potential for significant transboundary effects.

96. Table 32 outlines how the Strategic Environmental Assessment (SEA) process has shaped the drafting of the draft development plans. The table outlines how the environmental issues that arose throughout the SEA process were incorporated into the draft plans as objectives and policies.

97. As point 96 above.

98. It is recommended that a table outlining monitoring frequencies of the effects of the implementation of the development over its lifetime and those responsible for this monitoring be included in Section 10 of the Environmental Report.

99. Noted.

100. Noted.

101. Noted.

5.85 Submission Ref: DMCDP85
Person/Body: Irish Wind Energy Association
Location: N/A
Core Issue: Wind Energy

Points Raised

1. Renewable energy development is a vital part of Ireland's strategy to tackle two major challenges - ensuring a secure supply of energy and combating climate change.
2. Wind energy produces indigenous renewable electricity while reducing greenhouse gas emissions by displacing traditional fossil fuels.
3. Ireland has become heavily dependent on the importation of fossil fuels in order to meet its energy needs – fossil fuels account for more than 90% of electricity generation in Ireland.
4. This high dependency on foreign energy imports is unsustainable and Ireland is currently extremely vulnerable both in terms of meeting future electricity needs and ensuring price stability.
5. The Department of Communications, Energy and Natural Resources' (DCENR) energy policy has been moving towards greater levels of self-sufficiency with renewable energy being a key part of the Government's Energy Policy Framework 2007-2020.
6. Ireland's target under the EU Directive 2009/28/EC on the Promotion of Renewable Energy Sources is for renewable resources to account for 16% of total energy consumption by 2020. Failure to meet these targets could result in EU sanctions.
7. In line with these commitments, DCENR announced a revised target for electricity from renewable energy sources of 40% by 2020. It is widely acknowledged that wind energy will contribute to the vast bulk of this target.
8. The expansion of the Irish wind energy industry will be an extremely positive economic development for Ireland and will result in greater grid security and stability, job creation and lower energy prices.
9. The wind energy sector generates more jobs per MW of power installed, per unit of energy produced and per euro of investment, than the fossil fuel energy sector.
10. Ensuring the security of energy supply is also a key part of the Government's Framework for Sustainable Economic Revival.
11. Having regard to the current economic downturn, the framework acknowledges the need to put the energy/climate change agenda at the heart of Ireland's economic renewal.
12. Every new wind farm development provides a substantial contribution to the local and national economy through job creation, Local Authority rates, land rents and increased

- demand for local support services in construction, operation and maintenance, legal and accounting and project management.
13. More wind on the system will also result in lower and more stable energy prices for consumers whilst helping IWEA achieve energy and emissions targets.
 14. As the vast majority of new renewable capacity will be provided by on-shore wind, the 40% target is a significant challenge for the Irish wind energy as a whole.
 15. In June 2012, Ireland's total capacity on the island was 2053.16MW generated from 175 wind farms in 26 counties. Another 3,250 MW of additional wind capacity, will need to be installed on-shore in Ireland within the next 8 years to meet the RES-E target in ROI and the target set out in the Strategic Energy Framework for NI. County Monaghan currently has a single operational windfarm of 7.5MW located at Mullananalt.
 16. In addition to Mullananalt, planning permissions also exist in respect of proposed projects at Coolberrin Hill (5 turbines), Tullynageer (5 turbines) and Carrickatee (7 turbines). Notwithstanding these permissions it is considered that additional potential exists within the county for new windfarm development.
 17. IWEA wishes to emphasise that the optimum siting of wind farm developments is in an area where there is a sufficient wind resource. Notwithstanding the fact that in inland counties which are not exposed to a vigorous coastal wind regime, the best wind resources exists in the elevated areas.
 18. With the continuing increase in hub heights and rotor diameter being offered by turbine manufacturers, the resource in less windy inland sites can also be exploited.
 19. Identification of suitable areas by Monaghan County Council will ensure that wind energy will be developed on the optimum sites and will deliver tangible benefits in terms of local authority rates, service jobs in legal, engineering and construction, construction supplies, landowner annual rental income and increased security of electricity supply.
 20. The energy in the wind is a cubic factor of its speed. In inland counties, which are not exposed to a vigorous coastal wind regime, the best wind resource exists in the elevated areas.
 21. Given that sustainable development is now one of the most universally endorsed aspirations of our time and that it is generally recognised that sustainability is a central concept which must underpin economic, social and environmental development wind farms should be built where the resource can be harnessed economically and therefore forward planners need to seriously consider the optimum sites in the county, in terms of resource for wind energy development.

22. The current policies on renewable energy and resources in the Monaghan County Development Plan 2007-2013 are generally supportive of wind energy development but it is considered that more could be done in order to realise the full potential within the county.
23. Policy REN 3 contained within the current county development plan is significant in that it seeks to *“promote a ‘plan led’ approach to identify areas where there is significant wind energy potential”*. IWEA is of the view that having a framework in place which guides development to occur in certain locations is the most appropriate policy for wind farm development.
24. Given that it is an objective within the current plan to produce such a strategy, it is considered that this should now form part of the draft development plan.
25. Map 4.7 Development Constraints illustrates some of the primary development constraints that should form the basis of any wind energy strategy. The advantages of such an approach are that it provides a greater degree of certainty to both developers and the council in terms of identifying the most suitable areas in which to develop.
26. Section 15.6 of the draft plan is entitled Electricity and Gas Infrastructure. IWEA wish to highlight the importance of the development of grid infrastructure and recommends that the development plan should facilitate the provision of energy networks.
27. Policy EGP3 states “The undergrounding of electricity transmission lines shall be considered in the first, as part of a detailed consideration and evaluation of all options available in delivering and providing this type of infrastructure”.
28. The DCENR has recently published “Government Policy Statement on the Strategic Importance of Transmission and Other Energy Infrastructure” which calls for investment programmes to be delivered in the most cost efficient and timely way possible on the basis of the best available knowledge and informed engagement on the impacts and the costs of different engineering solutions. The industry would like each application be assessed on its own merits to ensure that there is no prescribed direction to place the lines required to connect farms to the electricity network underground.
29. The existing approach to landscape protection and wind energy development involved consultation between developments, the electricity system operators and the planning authority. This system provides for an assessment of issues and appropriate mitigation measures to be included in any development proposals and allows each application to be considered on its own merits.
30. It is currently not the policy of the system operators to offer underground cable options instead of overhead power lines. There are many technical and operational difficulties that apply to underground cables which do not apply to over ground cables such as:

- Overhead power lines can provide a more secure electricity supply than underground cables. Overhead lines are easier and faster to maintain and repair while underground cable faults can take weeks to repair, may be difficult to locate and therefore maintenance and repair is thus a much slower process.
- Trenching associated with underground cables has its own environmental and technical concerns and also from a technical point of view certain land types are not suitable /desirable for undergrounding cables.
- Underground high voltage cables are considerably more expensive to install than overhead lines. In some cases this extra cost may render a wind energy project economically non-viable.

31. If Ireland is to meet its national targets and its international obligations, it is essential that all regions develop a well designed wind development strategy with defined zoning as part of county development plans.
32. The broad support for wind energy projects by Monaghan County Council is to be welcomed, it is essential that a planned and sustainable approach to the development of renewables continues to be adopted, to ensure a future balance of economic development and employment creation with continued protection of the environment.
33. The existence of a significant wind resource in Ireland which can be harnessed is well documented and ambitious plans for its development are prescribed by Government policy.
34. These plans can be realised in Monaghan by identifying those lands with significant wind energy potential.

Response of the Manager

1. Noted.
2. Noted.
3. Noted.
4. Noted.
5. Noted.
6. Noted.
7. Noted.
8. Noted.
9. Noted.
10. Noted.
11. Noted.
12. Noted.
13. Noted.

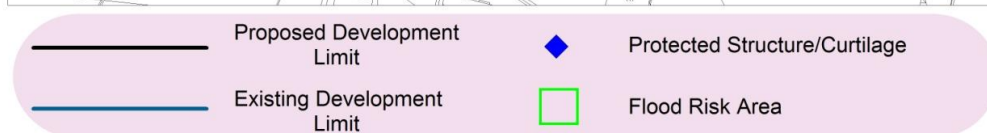
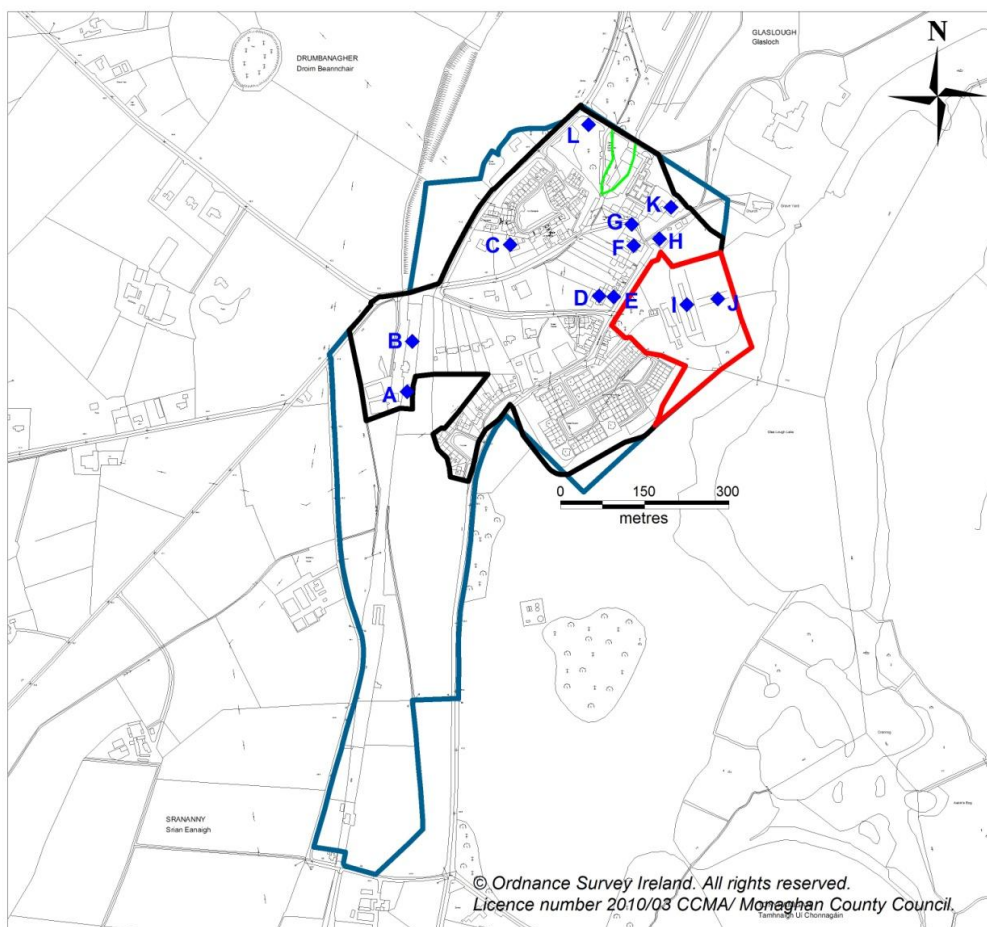
14. Noted.
15. Noted.
16. Noted and agreed. Section 5.7.5 of the draft development plan acknowledges that County Monaghan has significant potential for the development of wind energy.
17. Noted.
18. Noted.
19. Noted.
20. Noted.
21. Noted and agreed. It is considered that Objective ERO4 sufficiently addresses this issue.
22. Noted.
23. Refer to point 21 above.
24. Refer to point 21 above.
25. Noted.
26. Noted and agreed. It is considered that Policy EGP2 sufficiently addresses this issue.
27. Noted.
28. Noted.
29. Noted.
30. Noted.
31. Noted.
32. Noted.
33. Noted.
34. Refer to point 21 above.

5.86 Submission Ref: DMCDP86
 Person/Body: Castle Leslie
 Location: Glaslough – Refer to Map DMCDP86
 Core Issue: Zoning of Additional Lands within Settlement Envelope and Protection of Heritage

Glaslough (Map DMCDP86)

Glaslough

Draft Monaghan County Development Plan 2013-2019



Development Constraints - GLASLOUGH

- (A) The Station, former railway station entrance and avenue (Protected Structure)
- (B) The Station, former railway station house (Protected Structure)
- (C) The Firs (Protected Structure)
- (D) The Coach House (Protected Structure)
- (E) Wrights Shop (Protected Structure)
- (F) Pillar House Hotel (Protected Structure)
- (G) Trinity House (Protected Structure)
- (H) Main Street Lodge, Castle Leslie (Protected Structure)
- (I) Garden Gate, Castle Leslie (Protected Structure)
- (J) Castle Leslie Walled Garden (Protected Structure)
- (K) Greystone House, Castle Leslie (Protected Structure)
- (L) West Lodge, Castle Leslie (Protected Structure)

Points Raised

1. Requests the inclusion of the lands outlined in red on above map within the settlement envelope of Glaslough.
2. The proposed settlement envelope severs the connection between the Walled Garden and the remainder of the complex of buildings.
3. An on-going challenge for Castle Leslie is to safeguard the heritage and prevent further loss and deterioration of building stock within the estate.
4. Finding economically viable uses for old buildings has been key to funding the restoration and maintenance of the Estate's portfolio of buildings, structures and landscape.
5. The restoration of the Walled Garden and immediate setting is the next priority, there needs to be opportunity to undertake the work and ancillary development without the constraints that might be imposed by its exclusion from the development envelope.
6. Requests that the current settlement envelope remains as is into the development plan for the period 2013-2019.
7. Wishes to draw attention to the publication "The Big Picture" which sets out the agenda for the conservation and sustainable development of the destination.
8. There is a clear need to ensure that the heritage aspects of Glaslough, in particular, street frontages, are adequately protected from inappropriate intervention such as demolition and alteration of features such as fenestration.
9. Other features such as the Horse Pond should be afforded appropriate protection.

Response of the Manager

1. It is considered that there is sufficient land within the settlement envelope of Glaslough to accommodate development over the period of the development plan.
2. It is considered that the settlement envelope will not have any physical impact upon the linkage between the Walled Garden and the remainder of the complex of buildings.
3. Noted.
4. Noted.
5. It is considered that the exclusion of the Walled Garden from the settlement envelope will not constrain the restoration of the Walled Garden or any ancillary development.
6. It is considered that there is sufficient land within the settlement envelope of Glaslough.
Therefore for this reason and the reasons set out in points 1 and 2 above, it is recommended that the subject lands be excluded from the settlement envelope of Glaslough.
7. Noted.

8. Chapter Four of the draft plan contains a number of objectives and policies in respect of the conservation of protected structures. Objective CAO2 also proposes to designate an Architectural Conservation Area in the Village during the lifetime of the development plan.
9. There is currently ongoing a review of the record of Protected Structures in the County. It is recommended that consideration of both buildings being designated as protected structures be included in this review. Any proposals to designate these buildings as protected structures would be presented to the elected members in conjunction with any other proposals to amend the Record of Protected Structures.

5.87	Submission Ref:	DMCDP88
	Person/Body:	Eirgrid
	Location:	N/A
	Core Issue:	Electricity Transmission Infrastructure

Points Raised

1. The national electricity transmission grid plays a vital role in the supply of electricity, providing the means to transport power across a meshed network, from generator locations to demand centres.
2. The Irish network is currently primarily connected to the transmission system of Northern Ireland by means of a one 275kV double circuit interconnection between Louth and Tandragee substations. There are also two 110kV connections to the Northern Ireland network, from Letterkenny in Co. Donegal and Corraclassy in Co. Cavan.
3. The Northern Ireland transmission system is currently connected to Scotland and Great Britain via a 500 MW High Voltage Direct Current link, the Moyle interconnector.
4. The Irish network will also be connected to the UK national grid by means of a 500MW high voltage direct current land and submarine cable, the East West Interconnector, between the existing substation at Woodland Co. Meath and a substation at Deeside, Wales. The East-West Interconnector is currently at the commissioning stage of its development and is planned to be fully operational in 2012.
5. The 400kV network provides a high capacity link between Moneypoint generation station on the west coast and the Greater Dublin Area of the east. The 220kV network forms a number of single circuit loops around the country. The 110kV network, which is the most extensive element of the overall transmission system, extends across the country.
6. The transmission system is almost entirely constructed as overhead line, except in very limited circumstances, such as congested or built-up areas, where underground cables are used. This is consistent with European and international practice of transmission grid infrastructure development.
7. Grid25 is a strategy indicating how EirGrid intends to implement the 207 Government White Paper on Energy – ‘Delivering a Sustainable Energy Future for Ireland’.
8. Grid25 sets out a Government approved high level strategy for the development of the necessary transmission infrastructure to support Ireland’s national renewable electricity target and in the long term a more sustainable electricity supply.
9. The Grid25 Implementation Programme 2011-2016 is a practical overview of how the early stages of the Grid25 Strategy intends to be implemented. This Implementation Programme highlights the strategic objectives of Grid25 for the long term development of a safe, secure, reliable, economic and efficient transmission system within each region.

10. There are a number of issues that need to be addressed for the strategic development of the electricity transmission infrastructure in the Border Region of the Republic of Ireland. These issues arise due to:
- The significant extent of new generation, in particular generation from renewable sources that is expected to materialise throughout both the Border Region itself and the West Region.
 - The requirement to optimally integrate renewable generation in the Border Region and Northern Ireland.
 - Security of supply in the region, and the county as a whole.
11. A substantial number of new electricity generators are intending to locate in the Border Region, particularly in Counties Donegal and Sligo and in Northern Ireland, each of which will require connection to the electricity transmission grid. These mainly comprise renewable generation sources such as wind farms.
12. The electricity transmission infrastructure in the wider region will require to be significantly strengthened to facilitate such connection, which will result in the requirement both to upgrade existing infrastructure and to construct new high voltage electricity transmission infrastructure.
13. This will have the benefit of strengthening the overall meshed grid, thus providing a more secure and reliable system for inward investment, as well as facilitating the transmission of energy generated to load centres throughout the region and the county.
14. EirGrid is currently working with the electricity network operator and owner in Northern Ireland to identify the optimal solution for the network on the island of Ireland to cater for renewable generation in the North-West of the island. It is the case that electricity generated in the North-West of the island will primarily need to be transmitted to demand centres for consumption therein, such as areas of higher population and employment. Ultimately, it is anticipated that the island of Ireland could become a net exporter of electricity, via subsea interconnectors.
15. The substantial number of new generation connections being sought in the West Region may also have an impact on the Border Region, as new inter-regional transmission reinforcement will be required to ensure that this generation is adequately connected to the National network.
16. The planned second major interconnector, known as the North-South 400kV Interconnection Development, between the Republic and Northern Ireland is required to improve competition by reducing transmission constraints that are currently restricting the efficient performance of the all-island Single Electricity Market, to support the development of generation from renewable energy sources and to improve security of supply on the island.

17. Minister Rabbitte stated at the recent launch of the Government Policy Statement on the Strategic Importance of Transmission and Other Energy Infrastructure that the “North South Interconnector Project should return to planning as soon as possible”.
18. Longer-term forecasted growth in demand for electricity in the Border Region, as outlined in Grid25, will place pressure on the transmission network, requiring its upgrading to ensure continued security of supply to local homes and businesses in the Region.
19. Strengthening of circuits between the North-West and North-East regions will be required in the longer-term to facilitate power flows including:
- Further integration of the Donegal and Northern Ireland networks;
 - Upgraded networks supplying Dundalk
 - Upgrading of the existing transmission network.
20. The 220kV network was first introduced in the early 1960s in Ireland, and the 400kV network was built in the mid-1980s. Since this time, this bulk power network has changed little while demand over the same period has grown by over 150% thereby leaving little capacity for further growth on the existing network. Anticipated increasing power flows on the network means that, between now and 2025, the capacity of the bulk transmission system will need to be significantly increased. The associated 110 kV network, which primarily brings power from the bulk networks to population centres, also needs to be substantially upgraded.
21. Grid25 seeks to achieve a balance between costs and the impact of new transmission infrastructure, through maximising the capability of the existing grid and, where new high capacity infrastructure is required, building it mainly at the 400 kV voltage. The following estimates have been made regarding the provision of infrastructure required to strengthen the National transmission network, in accordance with Grid25:
- Approximately 830 km of new circuits will be required between now and 2025 to meet the needs of consumers and generators. This represents an increase of about 20% on the total length of the existing network. Of this, 680 km will need to be at 220 kV or higher; the other 50 km will be at 110 kV. In addition to these circuits, others will be needed to connect many of the new generators to the Grid;
 - 2,530 km of the existing transmission network will need to be upgraded between now and 2025 to provide greater capacity. This comprises 850 km, of the existing 220 kV network, and 1,725 km of the 110 kV network.
22. EirGrid’s Transmission Forecast Statement 2012 – 2018 includes a comprehensive set of maps, diagrams and data describing the technical and topological characteristics of the existing high voltage power system and describes how the power system will be developed over the seven year period covered by the statement. The Transmission

Forecast Statement is available at the EirGrid website (www.eirgrid.com/aboutus/publications/transmissionforecaststatement2012-2018)

23. The transmission network in County Monaghan currently consists of circuits at 110 kV and a 275 kV circuit. There are currently no circuits at 220 kV or 400 kV.
24. The 110 kV infrastructure in County Monaghan is comprised of the following lines:
- Lisdrum-Shankill 110 kV (39.3 km, approximately 27 km of which is in County Monaghan;
 - Lisdrum-Louth 110 kV (40.4 km, approximately 40 km of which is in County Monaghan;
 - Louth-Ratrussan-Shankill 110 kV (52 km, approximately 25 km of which is in County Monaghan);
 - Louth – Meath Hill 110 kV (15.1 km, approximately 6.4 km of which is in County Monaghan; and
 - Approximately 8 km of 275 kV double circuit overhead line is located in County Monaghan. This forms part of the existing North South Interconnector from Louth Substation, near the village of Louth in County Louth, to Tandragee Substation in County Armagh.
25. An additional high-capacity electricity interconnector is required between the electricity networks of Ireland and Northern Ireland in order to comply with governing European Commission Directives and National energy policy statements, the most recent of which is the *'Government Policy Statement on the Strategic Importance of Transmission and Other Energy Infrastructure'* of July 2012.
26. Such an additional interconnector will provide multiple national benefits. It will facilitate greater cross-border sharing of electricity reserves; improve the efficiency of the all-island electricity market - providing competitive electricity prices for consumers in Ireland; allow more renewable energy to be connected to the network thus reducing Ireland's production of greenhouse gases and its reliance on imported fossil fuels; and will enhance the security of the electricity supply throughout Ireland.
27. The proposed Interconnector will also deliver a benefit that is specific to the residents of the north east area including those in County Monaghan.
28. It has been predicted that between 2015 and 2020 the reliability of the electricity supply in the north east area will fall below the acceptable standard. If nothing is done to correct this the quality of the local electricity supply will slowly deteriorate. This will have a negative impact on economic activity in the area and on the standard of living, and quality of life, of local inhabitants.
29. The implementation of the overall North South 400kV Interconnection Development will keep the north east area in compliance with the quality of supply standards for many years to come.

30. The North South electricity transmission interconnector will ultimately comprise as follows:
- Construction of a 140km 400kV overhead line from the existing Woodland Substation in Batterstown, Co. Meath to a new substation in Turleenan, Co. Tyrone. Approximately 37km of this proposed 400kV overhead line is located in Co. Monaghan
 - The construction of a new substation near the intersection of the proposed north-South Interconnector and the existing Flagford-Louth 220kV overhead line that will connect these two lines together. The proposed substation will be required to further reinforce the electricity supply to the north east area and the timing of its construction will be determined by a number of factors including the growth in electricity consumption in the region. Although the point of intersection of the proposed new Interconnector and the existing 220kV overhead line will be in County Cavan it is sufficiently close to the boundary with County Meath to raise the possibility that the substation might be located in County Meath.
31. As the North South Interconnector Project re-evaluation process is still ongoing the above description remains indicative. EirGrid however expects to complete the project re-evaluation process in the coming months and will then announce its preferred project solution.
32. There is an ongoing programme of line refurbishment concentrating on the older lines. The transmission lines which have been identified for refurbishment in County Monaghan are as follows:
- Lisdrum-Ratrussan-Shankill 110kV
 - Lisdrum-Louth 110kV
33. In addition, a need for a new 100kV substation has been identified between Louth and Ratrussan 100kV stations. The location of this substation has not been identified at this stage.
34. No other projects are currently planned by EirGrid in County Monaghan, however, it should be noted that other new projects could arise over the coming years to facilitate normal electricity demand growth, connection of new electricity generation projects as licensed by the Commission for Energy Regulation or any major industry locating in the county.
35. All future transmission development projects in the county will be developed in consultation with the County Council, in accordance with EirGrid's Project Development and Consultation Roadmap.
36. EirGrid considers that it is imperative that the draft development plan should support the provision for new High Voltage electrical infrastructure, including high voltage transform stations and new overhead transmission power lines.

37. Such infrastructure will be required for reinforcement of the transmission network, related to growing electricity demand from existing customers as well as connection of new generation and large demand customers. Some requirements are likely to arise at short notice in line with the time-scale for development of the industry or the power station.
38. Such consultation is reflected in the recently published 'Government Policy Statement on Strategic Importance of Transmission and Other Energy Infrastructure'.
39. In line with the requirement to have regard to other Government policy, Local Authorities and An Bord Pleanála are required to have regard to this policy statement as of the date of publication (18th July 2012). The conclusion states *"The Government reaffirms, in conclusion, the imperative need for development and renewal of our energy networks, in order to meet both economic and social policy goals. The planning process provides the necessary framework for ensuring that all necessary standards are met and that comprehensive statutory and non-statutory consultation is built into the process. We acknowledge the need for social acceptance and the appropriateness of exploring ways of building community gain considerations into project planning and budgeting. Delivering long lasting benefits to communities is an important way of achieving public acceptability for infrastructure. The State network companies are mandated to plan their developments in a safe efficient and economic manner. They are also required to address and mitigate human, environmental and landscape impacts, in delivering the best possible engineering solutions. The major investment underway in the high voltage electricity transmission system under EirGrid's Grid25 Programme is the most important such investment in Ireland's transmission system for several generations. While the Government does not seek to direct infrastructure developers to particular sites or routes or technologies, the Government endorses, supports and promotes the strategic programmes of the energy infrastructure providers particularly EirGrid's Grid25 investment programme across the regions and reaffirms that it is Government policy and in the national interest, not least in the current economic circumstances, that these investment programmes are delivered in the most cost efficient and timely way possible, on the basis of the best available knowledge and informed engagement on the impacts and the costs of different engineering solutions"*.
40. The Regional Planning Guidelines for the Border Region 2010-2022 incorporates a 'Policy Framework for Electricity Provision' (Policy INFP 23) which states that Development Plans should facilitate the provision of energy networks in principle.
41. EirGrid welcomes the inclusion of this policy at Section 15.16 Electricity and Gas infrastructure in the draft development plan.
42. EirGrid notes Policy LPP3 in Chapter Four and Policies EGP3 and AMP1 in Chapter 15 of the draft development plan.

43. EirGrid draws attention to the recently published ‘Government Policy Statement on Strategic Importance of Transmission and Other Energy Infrastructure’ where it states: EirGrid is required “to address and mitigate, as necessary, human, environmental and landscape impact in delivering the best possible engineering solutions for Ireland’s small and still isolated electricity system. The Government also notes that EirGrid and ESB Networks are mandated to plan these developments in a safe efficient and economic manner in accordance with their licences from the Commission for Energy Regulation” and “the Government endorses, supports and promotes the strategic programmes of the energy infrastructure providers, particularly EirGrid’s Grid25 investment programme across the regions, and reaffirms that it is Government Policy and in the national interest, not least in the current economic circumstances, that these investment programmes are delivered in the most cost efficient and timely way possible, on the basis of the best available knowledge and informed engagement on the impacts and the costs of different engineering solutions”.
44. It is within this framework that EirGrid must carry out its consideration of the available technical alternatives.
45. This will thereby be the context within which Draft Policy EGP3 will be considered in the development of transmission projects. EirGrid always considers local, environmental, technical and other constraints, and endeavours to avoid, limit or mitigate any impact on identified constraints. The final project proposal involves a careful balance between the identified need for the project and technical, environmental, economic and social issues. It should be noted that this process applies to all new projects commencing after the date of publication, however in the case of projects commenced prior to publication, the process will be followed in so far as it is practicable.
46. In this context EirGrid is concerned that the inclusion of Policy LPP 3 and AMP 1 are unduly disruptive, and could impact on its ability to fulfil its statutory obligations as set out in S.I. No. 445/2000 — European Communities (Internal Market in Electricity) Regulations, 2000, to operate, ensure the maintenance of, and develop a safe, secure, reliable, economic and efficient electricity transmission system in Ireland, while having due regard for the environment. It could also impact upon EirGrid’s compliance with the provisions of the Government Policy Statement. As such EirGrid seeks the removal of these draft policies from the development plan or otherwise make amendments so as to ensure that there is no conflict with EirGrid’s statutory obligations to develop the transmission infrastructure network.

Response of the Manager

1. Noted.
2. Noted.
3. Noted.
4. Noted.
5. Noted.
6. Noted.
7. Noted.
8. Noted.
9. Noted.
10. Noted.
11. Noted.
12. Noted.
13. Noted.
14. Noted.
15. Noted.
16. Noted.
17. Noted.
18. Noted.
19. Noted.
20. Noted.
21. Noted.
22. Noted.
23. Noted.
24. Noted.
25. Noted.
26. Noted.
27. Noted.
28. Noted.
29. Noted.
30. Noted.
31. Noted.
32. Noted.
33. Noted.
34. Noted.
35. Noted.
36. Noted.

37. Noted.

38. Noted.

39. Noted.

40. Noted.

41. Noted.

42. Noted.

43. Noted.

44. Noted.

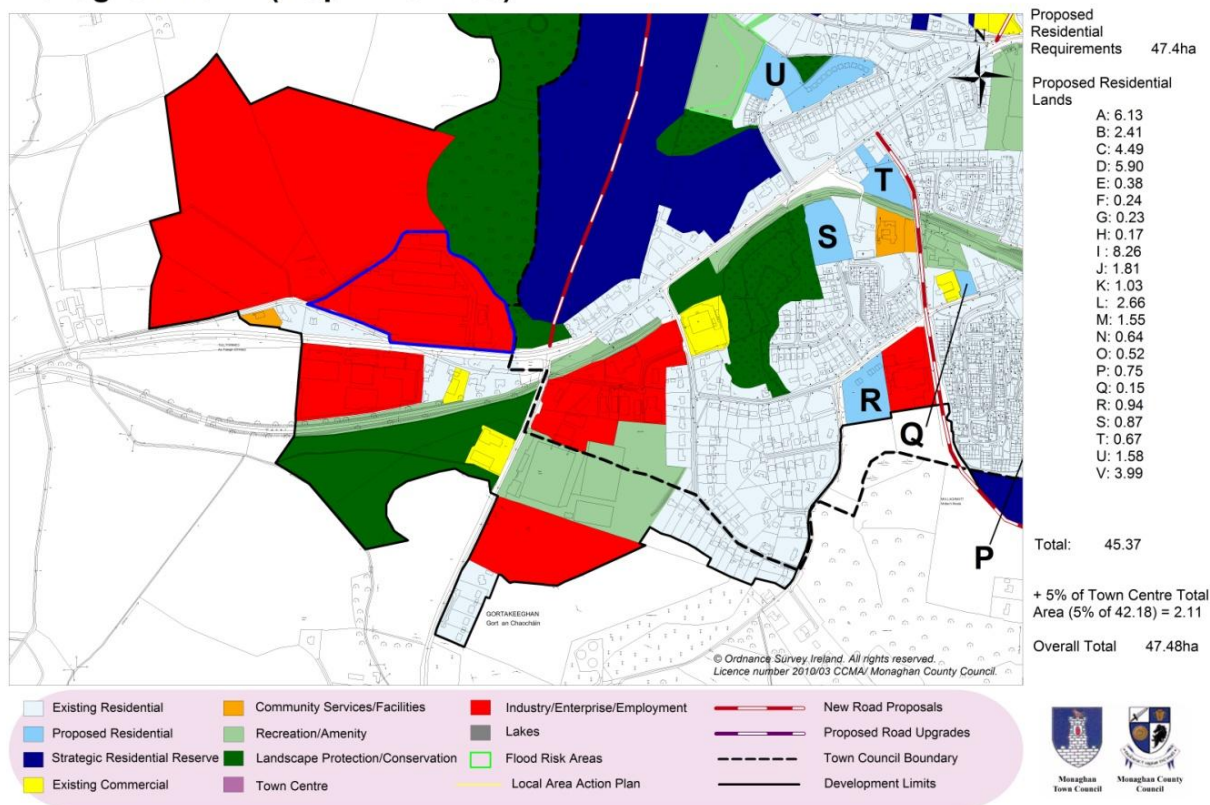
45. Noted.

46. It is a principal role of the Planning Authority to protect the most sensitive landscapes from intrusive and unsympathetic development which would irreversibly damage the environment and heritage of the County. In addition the protection of residential amenity is an important function of the planning system. **Therefore for this reason it is recommended that Policies LPP3 and AMP1 remain in the development plan.**

5.88 Submission Ref: DMCDP89
 Person/Body: Barry Aughey
 Location: Monaghan – Refer to Map DMCDP89
 Core Issue: Re-zoning of lands from Industry, Enterprise and Employment to Existing Commercial

Monaghan Town (Map DMCDP89)

Draft Monaghan County Development Plan 2013-2019



Points Raised

1. Monaghan Retail and Business Park is now developed and operating as a commercial centre.
2. The Park has been constructed in accordance with the parent permission and the lands are currently zoned as “Commercial”.
3. The rezoning of the lands from “Commercial” to “Industry, Enterprise and Employment” will have detrimental impacts not only for the Park, which acts as a retail hub, but for the entire County. It is not clear how Monaghan Town or County would benefit from the proposed rezoning.
4. Submission requests that the continuance of the objective allowing up to 30% of the gross floorspace of the park to accommodate convenience and comparison uses to ensure the park can continue to develop successfully in the future. The existing objective should be

amended as follows “Ancillary non bulky comparison and convenience retailing uses will be permitted on zoned existing commercial lands at Cornecassa, Monaghan identified as ‘Existing Commercial’ on Monaghan Town Zoning Map (Map MDP1) with the provision that not more than 30% of the gross floor area of Monaghan Retail and Business Park may be permitted for the sale of ~~small~~ comparison and convenience goods.’

5. Correction is required to the zoning matrix.
6. Submission questions why a corrected zoning matrix was not put on public display given the restrictions on parties to comment only on differences between a draft development plan and an amended draft plan.
7. Clarification of the Town Council Boundary is required.
8. Submission queries the justification of rezoning sites such as the garden centre and builder’s providers at Coolshannagh Roundabout as “existing commercial” whilst the Business Park at Cornacassa has been rezoned “Industry, Enterprise and Employment”.
9. Where the Local Authority is not amenable to the rezoning of the Retail and Business Park in its entirety for “Existing Commercial” a secondary option would be to split the zoning on the lands between Object E “Industry, Enterprise, and Employment” for the business park element and Objective F “Existing Commercial” for the Retail Park element.

Response of the Manager

1. Monaghan Retail and Business Park comprises retail warehousing and light industry. The proposed zoning of the lands as “Industry, Enterprise, and Employment” reflects these existing mixed uses and will facilitate their expansion.
2. Noted.
3. It is not considered that the Monaghan Retail and Business Park acts as a retail hub. Monaghan Retail and Business Park comprises retail warehousing and light industry. The proposed zoning of the lands as “Industry, Enterprise, and Employment” reflects these mixed existing uses and will facilitate the expansion of existing industrial and employment enterprises. Specific objectives have been introduced under this zoning objective to accommodate existing uses on this site.
4. The Department of Environment Community Local Government “Retail Planning Guidelines for Planning Authorities” (April 2012) state *“To minimise potential adverse impacts on central areas, it is important that the range of goods sold in both existing and any future retail parks is tightly controlled and limited to truly bulky household goods or goods which are not portable by customers travelling by foot, cycle, or bus. While it is acknowledged that there are ancillary items associated with an otherwise bulky good, e.g. computer software, printing paper, it is recommended that the retail floorspace devoted to such ancillary products should not exceed 20% of the total net retail floorspace of the*

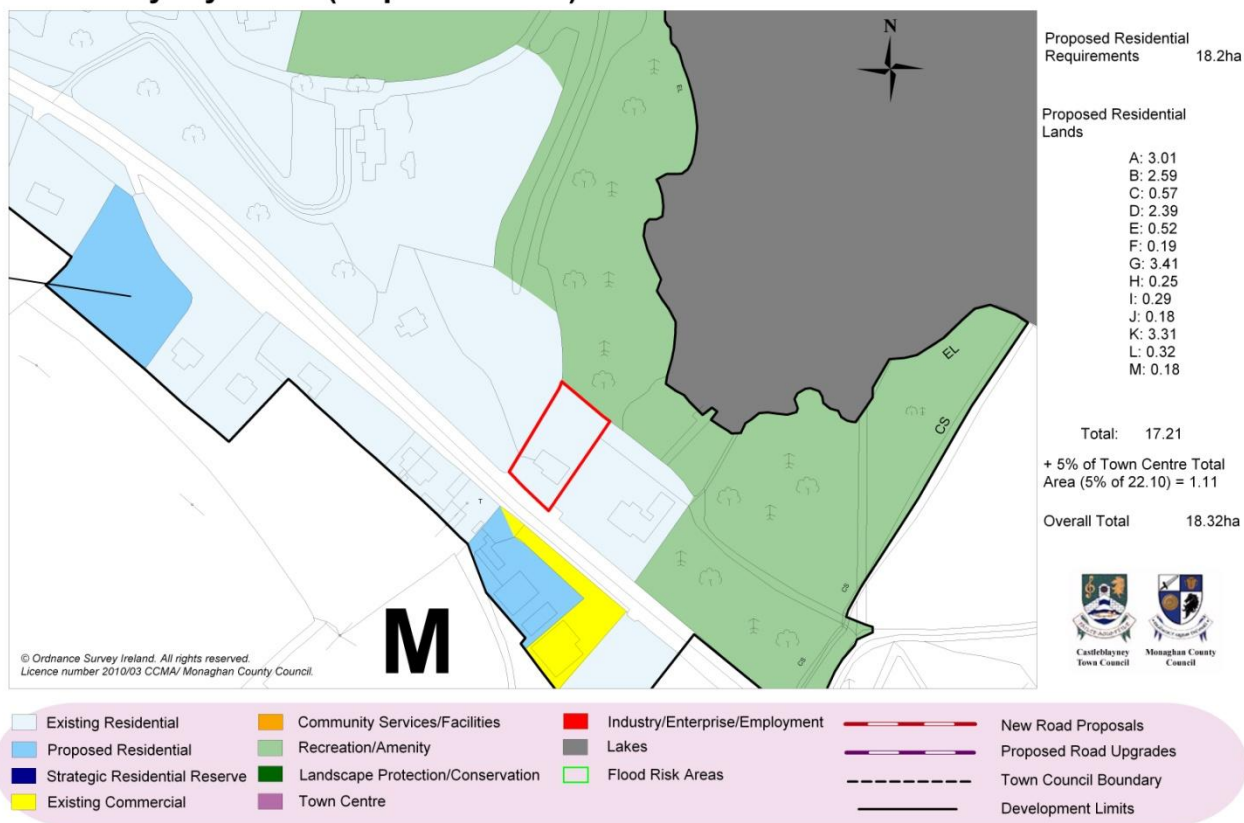
relevant retail unit and such space to be clearly delineated on the planning application drawings to facilitate future monitoring and enforcement". The development plan must be consistent with the guidelines issued by the Minister. **Therefore it is recommended that the continuance of the objective allowing up to 30% of the gross floorspace of the park to accommodate convenience and comparison uses is not included within the draft development plan.**

- 5. It is recommended that the zoning matrix be reviewed to correct any anomalies (Refer to Appendix One).**
6. The amended zoning matrix will be published as a material alteration to the draft development plan and submissions invited on the amendment.
- 7. It is recommended that maps within the draft development plan are reviewed to correct any anomalies.**
8. As point 1 above.
9. As point 1 above.

5.89 Submission Ref: DMCDP90
 Person/Body: Clare and Francis McElroy
 Location: Castleblayney – Refer to Map DMCDP90
 Core Issue: Use of Existing Residential Lands for Trophy Showroom

Castleblayney Town (Map DMCDP90)

Draft Monaghan County Development
 Plan 2013-2019



Points Raised

1. Live in Gate Lodge at Annahale.
2. Wishes to display trophies and different awards in a showroom/engraving room in back garden.

Response of the Manager

1. Noted.
2. It is considered that retail development would not be appropriate in an existing residential area.

5.90 Submission Ref: DMCDP91
Person/Body: Meath County Council
Location: N/A
Core Issue: N/A

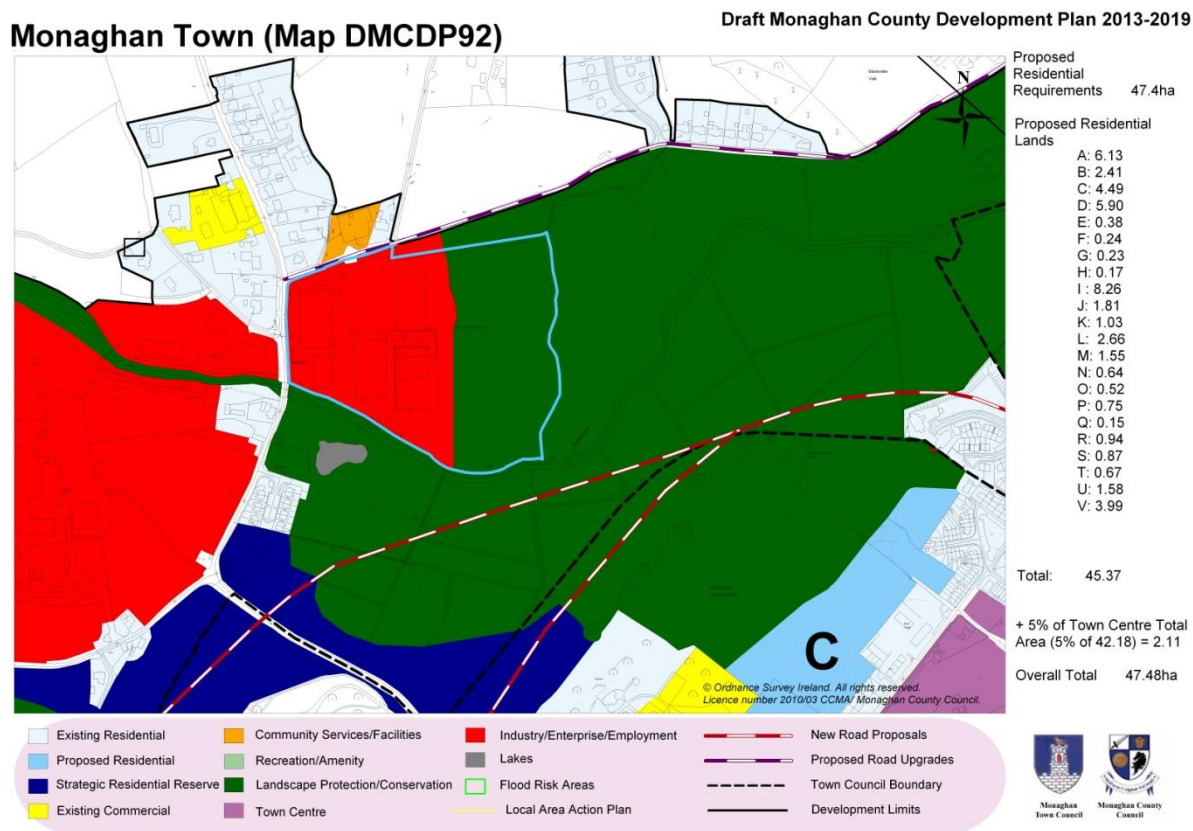
Points Raised

Meath County Council has no comment to make at present on the Draft Monaghan County Development Plan 2013-2019.

Response of the Manager

Noted.

5.91 Submission Ref: DMCDP92
 Person/Body: Robert Patton
 Location: Milltown, Monaghan – Refer to Map DMCDP92
 Core Issue: Re-zoning of lands from Landscape Protection/Conservation to Industry Enterprise and Employment.



Points Raised

1. Mr. Patton's lands were previously zoned for Industry and Employment and under this zoning he developed the lands into what is considered a prime development location and could be considered 'shovel ready'.
2. Development to date has encouraged a number of high profile businesses to the area such as An Post, Shannon Side Northern Sound, JBS Safety and many others.
3. The lands have been designated as Landscape Protection/Conservation in the draft development plan.
4. In the development of the lands, Mr. Patton has put in place infrastructure to accommodate the development of the remaining lands.
5. Mr. Patton was informed that the reason for re-zoning the lands in the area was a result of concerns regarding flooding.

6. The lands are in close proximity to the River Blackwater and the river forms part of the Neagh Bann catchment area, which is currently being assessed by the OPW and part of the CFRAMS program.
7. Maps prepared by Monaghan County Council indicate areas where historical flooding has occurred, where projected flooding extends to due to fluvial flooding and lands that would benefit from being drained.
8. Submission notes that these maps have informed the draft development plan. The majority of the information contained within the maps is from the OPW namely from www.floodmaps.ie and www.cfram.com . The OPW acknowledges that these sources are at preliminary stages.
9. The site has been owned by the Patton family for generations and they can state with some authority a level above which the river has never reached.
10. The OPW mapping for the area suggests that the lands would benefit from drainage while the report sections which highlights areas of known flooding and includes reports and photographs do not record any flooding for this particular area.
11. The OWP have prepared draft maps of indicative flooding extents and outcomes from their Preliminary Flood Risk Assessment. The preliminary maps show areas where flooding could extend to during a variety of flooding scenarios. Given that these maps are only at draft stage the accuracy of predictions are subject to verification and so some areas which have been shown at risk may well prove to have no risk of flooding.
12. Submission includes an extract from the PFRA for the Milltown area and indicates that the majority of flooding occurs to the East and South of the lands in question. Submission further states that there is no indication from the map that fluvial flooding will occur at the lands in question.
13. Submission provides a definition of flood risk and provides a diagram illustrating the sequential approach to dealing with flood risk on the subject lands.
14. The subject lands are above the maximum flood level of the river and no works are proposed which would reduce the flood storage along the narrow part of the site along the river.
15. The topography of the site has been studied in depth, a contour map is included within the submission, and it has been concluded that the majority of the lands can never flood as a result of flooding of the River Blackwater. Therefore the re-zoning of the lands should be reversed.
16. Submission provides a proposed zoning map for Milltown which indicates an area of land which should be retained for Industry and Employment. The lands have been selected as a result of a contour survey.

17. Submission notes that lands to the south of the site, closer to the river, are at a lower level and therefore are potentially at risk of flooding and are therefore not included within the revised zoning proposal.
18. Submission also proposes a second zoning option which involves building on land which is prone to flooding but compensating for this loss using other lands which would be lowered in level.
19. A map is included within the submission which highlights an area of the land which would be filled to make up ground levels whilst lands to the south would be reduced in level to allow it to flood.
20. The subject lands are attached to the existing Milltown Business Park and in this context investment has already been made to facilitate the future of development of this area through the following:
 21. Storm and foul network pipes, water pipes and access roads.
 22. Broadband communications are already in place.
 23. Investment in foundations for secondary access to the undeveloped part of the site has already taken place
 24. ESB overhead poles across the land were replaced with underground cables along the perimeter of the land.
 25. Spoil from the existing site works is stored on the land for use in building up the lower part of the site for future car park use.
 26. Initial ground work was commenced on lands adjacent to An Post for the construction of the next unit when conditions are favourable.
 27. In terms of availability of potential areas to be developed in Monaghan Town for Industry/Enterprise/Employment the land at Milltown is considered to be one of the most attractive and development friendly.
 28. A large percentage of the other designated areas for Industry, Enterprise and Employment have drawbacks. The zoned area to the west of the town, on the Clones Road requires the proposed road link given the congestion problems it faces at peak times in the morning.
 29. The zoned area to the south of the town centre requires the link road to be constructed, although this is currently only at planning stage.
 30. A considerable proportion of the land to the east of the town centre requires major infrastructure investment in terms of new link roads.
 31. The existing access route whilst requiring a much needed upgrade, provides the site with good access to the National Primary Road and avoids the need for HGV traffic to go through the town.

32. It should also be noted that commercial developments which a number of different users requires to be managed for the benefit of all tenants therein. This means that tenants pay into a common fund to manage the annual maintenance of the development. The more tenants that occupy the development the cheaper and more competitive they are in relation to other business parks across the county – this arrangement provides additional incentive to potential future investors.
33. In conclusion it is apparent that there are no flooding issues surrounding the land proposed. The topography of the site is such that the river has no impact on the land.
34. Some of the land previously zoned for industry and employment should not be zoned for landscape/protection/conservation as they do not form part of the River Blackwater's floodplain.
35. The lands in question has infrastructure which allows for immediate development and investment and has the potential to accommodate large premises which can be designed for industry specific needs. The lands are located close to the N2 without the requirement for navigation through Monaghan Town and significant investment has already been spent to facilitate future development.
36. Lands owned by Mr. Patton as highlighted in yellow should be retained as industry/enterprise/employment.

Response of the Manager

1. Noted.
2. Noted.
3. Noted.
4. Noted.
5. Noted. Areas which have been zoned as Landscape Protection/Conservation have been done so because they are important landscape features, elevated lands or are lands at risk of flooding within the settlements that have been identified so as to ensure that developments do not detrimentally impact on the amenity of the landscape, on the natural setting of the town, or on the natural attenuation offered by flood plains.
6. Noted.
7. Noted.
8. Noted.
9. Noted.
10. Although a Strategic Flood Risk Assessment for County Monaghan is currently on going, the suitability of lands for development having regard to flood risk, has been determined using preliminary information obtained from historic flood maps, information from the Office of Public Works, contour mapping and LIDAR information, site inspections, and

assessment by County Council engineers. In addition the principles set out in the Department of Environment, Heritage and Local Government Guidelines “The Planning System and Flood Risk Management (2009)” have also been applied. This has resulted in the adoption of a precautionary approach being applied to lands which either are currently at risk of flooding or could be at risk of flooding in the future, where they have been excluded from development or restricted to development of a type that has a low vulnerability to flooding or is water compatible. The completed Strategic Flood Risk Assessment for the County will be factored into the statutory two year review of the development plan in 2015 and any necessary changes to the development plan will be progressed by way of variation.

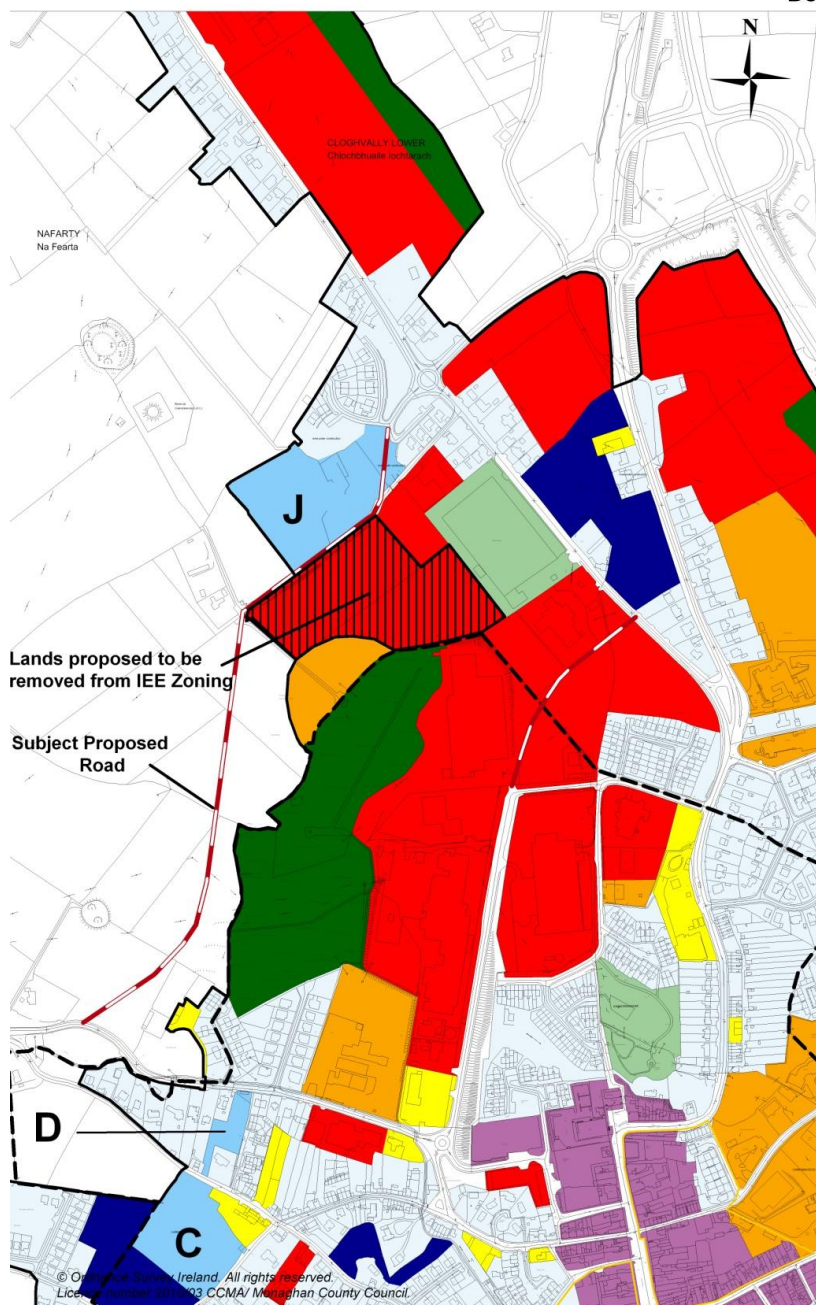
11. As point 10 above.
12. As point 10 above.
13. Noted.
14. The Strategic Flood Risk Assessment for the County and the Catchment Flood Risk Assessment Management Plan due for completion in two years time will allow an accurate determination of the flood level having regard to climate change and other factors.
15. The suitability of lands for development having regard to flood risk, has been determined using preliminary information obtained from historic flood maps, information from the Office of Public Works, contour mapping and LIDAR information, site inspections, and assessment by County Council engineers. In addition the principles set out in the Department of Environment, Heritage and Local Government Guidelines “The Planning System and Flood Risk Management (2009)” have also been applied. This has resulted in the adoption of a precautionary approach being applied to lands which either are currently at risk of flooding or could be at risk of flooding in the future, where they have been excluded from development or restricted to development of a type that has a low vulnerability to flooding or is water compatible. The completed Strategic Flood Risk Assessment for the County will be factored into the statutory two year review of the development plan in 2015 and any necessary changes to the development plan will be progressed by way of variation.
16. **It is recommended that the lands in question remain zoned as Landscape Protection/Conservation to ensure that development does not detrimentally impact on the natural attenuation offered by flood plains until such time as it has been proven that the lands are not subject to flooding.**
17. Noted.
18. As point 16 above.
19. As point 16 above.

20. Noted.
21. Noted.
22. A number of landbanks have been identified within the draft development plan to accommodate future industry, enterprise and employment needs. They have been strategically located so as to benefit from improving transport linkages and services to consolidate existing industrial development areas and within the context of achieving balanced spatial development within/throughout the towns.
23. See point 22.
24. See point 22.
25. Noted.
26. This is not a consideration relevant to the draft development plan.
27. The suitability of lands for development having regard to flood risk, has been determined using preliminary information obtained from historic flood maps, information from the Office of Public Works, contour mapping and LIDAR information, site inspections, and assessment by County Council engineers. In addition the principles set out in the Department of Environment, Heritage and Local Government Guidelines "The Planning System and Flood Risk Management (2009)" have also been applied. This has resulted in the adoption of a precautionary approach being applied to lands which either are currently at risk of flooding or could be at risk of flooding in the future, where they have been excluded from development or restricted to development of a type that has a low vulnerability to flooding or is water compatible. The completed Strategic Flood Risk Assessment for the County will be factored into the statutory two year review of the development plan in 2015 and any necessary changes to the development plan will be progressed by way of variation.
28. As point 16 above.
29. Noted.
30. **For the reasons outlined in points 10 and 16 above, it is recommended that the subject lands remain zoned as Landscape Protection/Conservation.**

5.92 Submission Ref: DMCDP93
 Person/Body: Con and Kathleen Goulding
 Location: Carrickmacross – Refer to Map DMCDP93
 Core Issue: Proposed Link Road and Zoning of Lands for Industry, Enterprise and Employment and for Community Services/Facilities

Carrickmacross Town (Map DMCDP93)

Draft Monaghan County
 Development Plan 2013-2019



Proposed
 Residential
 Requirement 19ha

Proposed
 Residential
 Lands

A: 0.43
 B: 0.21
 C: 1.55
 D: 0.33
 E: 3.00
 F: 1.22
 G: 2.80
 H: 0.81
 I: 4.75
 J: 2.56
 K: 0.31
 L: 0.20

Total: 18.17

+5% of Town Centre
 Total Area
 (5% of 28.49) = 1.42

Overall Total 19.59ha



Points Raised

1. Section 10.9.1 of the draft development plan lists the following proposed roads:
 - Link Rd from Kingscourt Road (179) to Shercock Road (R178)
 - Link Rd from Shercock Road (R178) to Ballybay Road (R180)/Castleblayney Road.
2. The proposed link road would divide Mr and Mrs Goulding's land in two and would have a negative impact on their home, land and livelihood.
3. Mr and Mrs Goulding acknowledge that it is an objective to take traffic and heavy goods vehicles away from the town centre, although they query whether the proposed road is the best option.
4. The proposed link road would have a negative impact on the existing Corr na Tobar housing estate and other proposed residential areas, bringing east/west traffic and heavy goods traffic through residential areas.
5. The proposed link road would pass the nearby Landscape Protection/Conservation area and would have the potential to negatively impact on the wildlife and landscape.
6. Mr and Mrs Goulding are concerned that lands within their ownership (adjoining the pumping station) have been rezoned to community services and that the adjoining lands have been zoned Industry, Enterprise and Employment, which will in effect land-lock their lands.
7. In addition the only access to the adjoining lands newly zoned as Industry/Enterprise/Employment would be via an existing residential area. Mr and Mrs Goulding have concerns with the extension of the industrial zoning next to Residential, Recreation/Amenity and Landscape Protection areas.
8. Mr and Mrs Goulding wish that Monaghan County Council will locate mobile phone masts, ESB sub-stations and windmills away from populated areas.

Response of the Manager

1. Potential link roads as indicated within the draft development plans are indicative and represent the centre line of a 100 metre wide preliminary corridor. A final route design has yet to be established for the proposed link road and it will be subject to detailed design and relevant consent procedures.
2. Noted.
3. It is considered necessary to provide a road which links the Shercock Road to the N2 By pass to relieve congestion in the town centre. Given that significant investment has already taken place in providing a link road from the N2 By pass to the Ballybay Road and a roundabout has been constructed at the intersection of the link road and the Ballybay Road, it is considered appropriate that the proposed link road from the Shercock Road

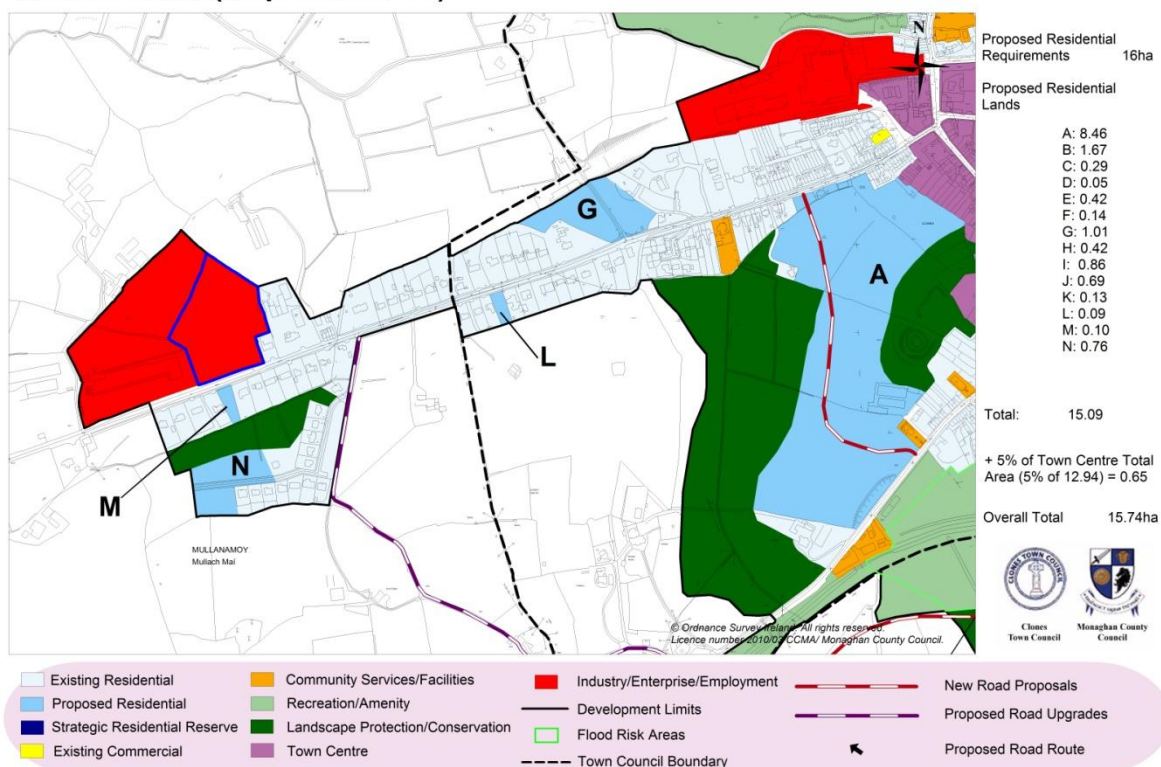
should link with this existing infrastructure. **Therefore for this reason it is recommended that this indicative route be retained in the development plan.**

4. As point 1 above.
5. As point 1 above.
6. As it is not clear which lands are in the ownership of Mr and Mrs Goulding it is difficult assess the implication of the zoning of lands for Community Services/Facilities.
7. Although the development of the lands zoned Industry, Enterprise and Employment would require a suitable buffer being provided between the residential lands and the new development in accordance with Policy INP9 in Chapter 15 of the draft plan, it is considered that there is sufficient industrial land included within the settlement envelope of Carrickmacross without the inclusion of the two fields indicated hatched on Map DMCDP93. It is proposed to retain the small field to the rear of Dooley Agricultural premises to facilitate any expansion of this business. **Therefore for this reason it is recommended that the two fields indicated hatched on Map DMCDP93 be removed from the development envelope of Carrickmacross.**
8. The draft development plan contains objectives and policies such as TEO3, REP2, and TEP4 which in conjunction with Planning Guidelines issued by the Department of Environment Community and Local Government and best practice technology and guidance seek to minimise the impacts upon residential amenity.

5.93 Submission Ref: DMCDP94
 Person/Body: Mr and Mrs McCarville
 Location: Clones – Refer to Map DMCDP94
 Core Issue: Rezoning of lands from Industry/Enterprise/Employment to Proposed Residential

Clones Town (Map DMCDP94)

Draft Monaghan County Development Plan 2013-2019



Points Raised

1. Mr and Mrs Carville are objecting to the re-zoning of their lands from low density housing in the current Monaghan County Development Plan 2007-2013 to Industry/Employment/Enterprise in the draft development plan.
2. The subject lands measure 1.81 hectares in size and has clear identifiable boundaries consisting of hedging interspersed with trees.
3. The lands are bordered by development on three sides, and it can therefore be described as an infill site along the Newtownbutler Road.
4. The Core/Settlement Strategy estimates that approximately 192 housing units will be required in Clones over the period 2011-2019. Based on an average density of 18 units per hectare the draft plan has estimated that 10.7 hectares should be zoned to facilitate the housing need. The 10.7 hectares was then adjusted by 50% to 16 hectares to introduce 'headroom' in the zoning of land for housing.

5. 'Headroom' is intended to make allowance for the vagaries of the market place and the difficulty in releasing sites for development. It is sometimes referred to as over-zoning.
6. Based on the density of neighbouring housing, it is estimated that the subject land should accommodate roughly 9 detached homes. This represents a density of 6 units per hectare, a third of the average density figure of 18 units that has been used in the draft development plan. The retention of this land would represent only a 4.7% addition to the total number of projected new dwellings estimated for Clones.
7. Submission notes that the density ratio utilised in the draft development plan of 18 units per hectare will not apply to all sites and therefore low density sites, such as the subject lands, can be factored into the housing land assessment without having a detrimental impact on the draft plan's Core Strategy calculations.
8. The 'headroom' adjustment referred to will not equip the core strategy with sufficient flexibility.
9. More than half of the lands zoned as proposed housing are contingent upon the creation of new roads or the improvement of others. There are reasonable grounds to maintain that the modest inclusion of the subject lands will allow for a degree of added flexibility in the application of the core strategy.
10. The need for flexibility is starkly illustrated by the largest residential zoning in the draft plan (Site A in the draft development plan). These lands account for 8.46 hectares (55%) of the overall zoned residential lands in Clones. However for housing to take place here it would require significant investment to fund the creation of a new link road connecting the Newtownbutler Road with the N54 Cavan Road. It is highly questionable whether such investment would be forthcoming during the lifetime of the plan.
11. Even allowing the fact that the draft plan has judiciously uplifted the amount of residential land by 50% to give 'headroom' it is clear from the example above that certain sites are confronted with implementation and servicing issues which will delay their development within a reasonable timeframe.
12. The costs of implementing some of the more challenging sites during the lifetime of the draft plan could undermine the ability of Clones to meet its development objectives under the National Spatial Strategy.
13. In keeping with the draft plans aim to consolidate the development within the town it is important to note that the subject land has infill credentials. The lands are located within the 60kmph speed limit and are situated between existing housing and a distribution depot on the Newtownbutler Road. Therefore development at this location would not contribute to urban sprawl.
14. The sustainability merits of the site relate to the ease by which this roadside site can make efficient use of the existing road infrastructure and services. The straight road will

allow for safe and convenient access and services can be conveniently connected to without the need for significant investment.

15. This part of the town is a much sought after residential area in Clones. Retention of sites such as this for low density, quality housing can improve choice for house buyers and can help to counteract demand for one-off housing in rural areas which the draft plan acknowledged has “accelerated the decline in the town’s population”.
16. Most of the land zoned for industry, employment and enterprise is located on the eastern side of the town off the N54 because it is a relatively flat area and allows for convenient access to Monaghan Town and the N2.
17. It appears from page 280 of the draft development plan that the provision of industrial land in Clones will continue to be linked to the main road network.
18. The subject lands are not located off the main N54 or near any of the proposed bypasses shown in the draft plan.
19. In addition it could be argued that small unit industrial needs of Clones have already been catered for by the development of Clones Business Technology Park.
20. The proposed industrial use would harm the character and amenities of the surrounding area. This is a concern given that the zoning category does not specify what type of industrial activity is suitable at this location. No distinction is made between light industrial use and heavy industrial use.
21. In principle high intensity, offensive forms of industrial development could take place at this location which would be out of keeping with the residential character of the area.
22. 36 hectares of land in Clones has been zoned for industry, employment and enterprise in the draft plan. The subject lands account for only 5% of this provision.
23. The industrial land to the rear of Target Express has also been zoned in the draft development plan which will facilitate the extension of Target Express if required. However it should be noted that the business has been operating at this location for 25 years and has not expressed an interest in expanding.
24. No industrial operator has ever inquired about purchasing the subject lands.
25. The topography of the subject lands being elevated towards the rear of the site, is unsuitable for modern industrial use. An amount of cutting and filling would be required to make the site fit for industrial purpose.
26. A build up of industry at this location would represent an inappropriate introduction to the town.
27. The retention of this residential zoned land will not undermine the core strategy of the draft plan. It would represent a 4.7% increase on the projected housing numbers for Clones.

28. The need to retain additional land for residential use is supported by the questionable ability of other sites to be delivered during the lifetime of the development plan bearing in mind the infrastructural costs that would be required to release them for development.
29. The subject lands represent an infill site, located within the 60kmph speed limit and therefore would not constitute urban sprawl
30. The popularity of this area for housing coupled with the topography of the site makes it unsuitable for industry.
31. The subject lands would only account for a 5% reduction in the total amount of proposed industrial land in Clones.
32. The retention of the subject lands for housing will still leave an appreciable amount of zoned industrial land available for the expansion of Target Express.
33. The lands should be retained as proposed residential.

Response of the Manager

1. Noted.
2. Noted.
3. Noted.
4. Noted.
5. Noted.
6. The proposed zonings in Table 3.13 provides for 50% additional zoning and represent a maximum residential land zoning for the requirement for the period 2011-2019.
7. As point 6 above.
8. Given the limited population growth in Clones and the significant amount of lands zoned Proposed Residential, it is considered that the 50% additional zoning will ensure a properly functioning market. In addition, both the Regional Planning Guidelines for the Border Region and the Department of Environment, Heritage and Local Government Development Plan Guidelines restrict the amount of over zoning in development plans.
9. As point 8 above.
10. The potential link roads as indicated within the draft development plans are indicative and will be subject to detailed design and relevant consent procedures. However, as any residential development would require the construction of an access road to serve the dwellings within it, these roads could be incrementally delivered as part of the development proposal. In addition this parcel of land has frontage to both the Newtownbutler Road and the Cavan Road and so is no more difficult to access than any other parcel of land zoned Proposed Residential.
11. As point 8 above.

12. Given the limited population growth in Clones and the significant amount of lands zoned Proposed Residential, it is considered that the 50% additional zoning will ensure a properly functioning market.
13. Noted.
14. Noted.
15. There is a significant number of plots of land proposed for Proposed Residential designated within the existing footprint of Clones, particularly along the Newtownbutler Road, which are undeveloped and which would afford for low density, quality housing.
16. It is considered important that existing Industry, Enterprise and Employment have opportunities to expand without creating urban sprawl. It is also considered important that there is a balance of zoned Industry, Enterprise and Employment at various locations in the town. The subject lands allow for the fulfillment of both of these aims.
17. Noted.
18. Noted, however, the Newtownbutler Road is an important route to Northern Ireland and the surrounding hinterland west of Clones.
19. Noted. Section 12.8 of the draft development plan acknowledges the Clones Business Technology Park, however it is important to have a varied range of zoned Industry, Enterprise and Employment lands.
20. The proposed zoning affords for the expansion of Industry, Enterprise and Employment. Zoning Objective E and Table 8.1 in Chapter Eight of the draft development plan detail a range of uses and indicate their broad acceptability in the this land use category. In addition, the subject lands abut an existing industrial development and the zoning of these lands as Industry, Enterprise and Employment is considered logical and sustainable. A suitable buffer will be required between the residential lands and the new development in accordance with Policy INP9 in Chapter 15 of the draft plan.
21. As point 20 above.
22. Noted. These lands are considered important in offering locational choice to proposed industrial development in the town during the lifetime of the plan.
23. Noted. However, it is considered appropriate to facilitate the consolidation of Industry, Enterprise and Employment uses.
24. Noted.
25. These issues can be addressed through the development management process.
26. The subject lands adjoin an already established Industry, Enterprise and Employment development. It is considered appropriate to facilitate the consolidation of Industry, Enterprise and Employment uses.
27. As point 6 above.
28. As point 8 above.

29. Noted.
30. As point 20 above.
31. As point 22 above.
32. Noted.
33. **For the reasons set out in points 15, 16, 18, 19, 20, 22, and 26 above, it is recommended that the subject lands remain zoned for Industry, Enterprise and Employment and are not zoned as Proposed Residential or Strategic Residential Reserve. If the elected members consider that it would be more appropriate for the lands to be zoned for residential use, it is recommended that the lands be designated Strategic Residential Reserve given their remove from the centre of Clones, and the need for a sequential approach to development of residential land as stipulated in the Department of Environment, Community and Local Government Guidance Note on Core Strategies, the Development Plan Guidelines and the Sustainable Residential Development in Urban Areas Guidelines published by the Department.**

5.94 Submission Ref: DMCDP95
Person/Body: Cllr Joe. Brennan
Location: Castleblayney
Core Issue: Various

Points Raised

1. Council should ensure that cycle paths are installed as part of the new fishing access roads at Black Island and While Island.
2. The parking of all vehicles on the 1st link Road at Lakeview Business Park should be prohibited at all times if and when the Business Park opened.
3. Monaghan County Council should proceed with the setting up of a warden system for Muckno Park in co-operation with Muckno Community Partnership. This would also comprise an overall management plan for the park.
4. Monaghan County Council and Castleblayney Town Council should prioritise the problem of Council owned derelict buildings, i.e. Castleblayney Courthouse and Hope Castle.
5. Out of town retail development should be prohibited.
6. Castleblayney should provide opportunities to develop a primary care facility in Castleblayney Town.

Response of the Manager

1. This issue is a matter for the fishing access development project. However, Objectives CWO4 and CWO6 in Chapter Seven of the draft plan seeks to promote and identify suitable cycle routes.
2. This issue falls outside the remit of the development plan.
3. This issue falls outside the remit of the development plan.
4. It is considered that objective TCO5 is sufficient to address this issue. The issues regarding Castleblayney Courthouse and Hope Castle relate to Castleblayney Town Development Plan.
5. It is considered that objective SRO3 is sufficient to address this issue. In addition this matter will be addressed in the revised Retail Development Strategy for County Monaghan 2013-2019.
6. This issue relates to Castleblayney Town Development Plan.

5.95 Submission Ref: DMCDP96
Person/Body: C S Pringle (National Roads)
Location: N/A
Core Issue: Access onto National Roads

Points Raised

1. C S Pringle has encountered cases of marriage breakdown where an additional dwelling is required. In one case this dwelling was accessing onto a national road.
2. The draft development plan does not cater for such compelling circumstances.
3. Requests that Policy RHP6 in Chapter 3 to be amended to allow for people that have experienced marriage breakdowns to be able to get planning permission on their lands, in rural areas under strong urban influence, to facilitate a displaced partner.
4. Requests that Policy NRP3 in Chapter 15 to be amended to allow people that have experienced marriage breakdowns to be able to get planning permission on their lands, where there is only access onto the national road, to facilitate a displaced partner.
5. Requests that Policy RDP18 in Chapter 15 to be amended to allow for people that have experienced marriage breakdowns to be able to get planning permission on their lands, where there is an issue of ribbon development, to facilitate a displaced partner.
6. The word *National* should be inserted before the word *regional* in this policy and the footnote should be amended to allow for marriage breakdown and proof of same. Such a facility is in place for landowners and returning immigrants but not for marriage breakdowns.
7. The DEHLG Sustainable Rural Housing Guidelines for Planning Authorities states that returning emigrants who want to return to their home place should have their housing requirements facilitated.
8. Request for Policy RDP9 in Chapter 3 to be inserted as a policy in Chapter 15 to allow a returning emigrant to build a house on their lands where the access is onto a national road and there is no alternative access.

Response of the Manager

1. Noted.
2. Noted.
3. It is considered that there are sufficient exceptions to permit a dwelling in rural areas under strong urban influence.
4. The DECLG Guidelines for Planning Authorities 'Spatial Planning and National Roads' states that the only exceptional circumstances where a new access or intensification of an access is for developments of a national or regional strategic importance, or onto sections

of lightly trafficked (less than 3,000 AADT) national secondary roads serving structurally weak areas. Therefore exceptions to allow someone experiencing a marriage breakdown to construct a dwelling with access onto national roads would be contrary to the provisions of these guidelines.

5. The DECLG Guidelines for Planning Authorities 'Spatial Planning and National Roads' states that the only exceptional circumstances where a new access or intensification of an access is for developments of a national or regional strategic importance, or onto sections of lightly trafficked (less than 3,000 AADT) national secondary roads serving structurally weak areas. Therefore to permit exceptions to Policy RDP18 involving ribbon development along national roads would be contrary to the provisions of these guidelines.
6. Noted.
7. The DECLG Guidelines for Planning Authorities 'Spatial Planning and National Roads' states that the only exceptional circumstances where a new access or intensification of an access is for developments of a national or regional strategic importance, or onto sections of lightly trafficked (less than 3,000 AADT) national secondary roads serving structurally weak areas. Therefore to permit exceptions to allow a returning emigrant to construct a dwelling with access onto national roads would be contrary to the provisions of these guidelines. **For this reason it is recommended that no additional exceptions to the prohibition of new accesses or the intensification of an access onto the National Road network are specified in the development plan.**
8. As point 7 above.

5.96	Submission Ref:	DMCD97
	Person/Body:	Department of Arts, Heritage and the Gaeltacht
	Location:	N/A
	Core Issue:	General

Points Raised

1. Ireland's archaeological heritage is a unique and special resource.
2. It is possible to avoid conflict between the old and the new by being aware of both the ancient and the modern at the pre-planning stage of development.
3. It is therefore vital and practical that the protection of the archaeological and historical heritage is incorporated into the development plan.
4. Unique sites, monuments or artifacts, or ones belonging to categories which only occur rarely, may be very important but archaeological significance or interest is not necessarily dependent on uniqueness or rarity.
5. Only a proportion of the material remains of past societies have survived and this is another reason why all the available evidence is of archaeological significance
6. The Record of Monuments and Places (RMP) of County Monaghan identify archaeological sites throughout the county. These Recorded Monuments are protected under the National Monuments (Amendment) Act 1994.
7. The maps showing the archaeological sites throughout County Monaghan are subject to updating. Thus the most recent edition should be consulted (see www.archaeology.ie).
8. The RMP is not an exhaustive list of all archaeology in existence; for example, hitherto unrecorded archaeological sites may survive as sub-surface remains.
9. The RMP is not an exhaustive listing of the archaeology of any particular county. Having regard to the impact of development upon both the known and unknown archaeological heritage of Co. Monaghan, the Department wishes to recommend a number of policies and objectives which should be considered for inclusion within the development plan.
10. The following general policy should be inserted *"The Council will protect archaeological heritage from damage, including any hitherto unrecorded sites"*.
11. It should be an objective of the planning authority to *"secure the preservation in-situ of, or preservation by record of the archaeological monuments included in the Record of Monuments and Places as established under section 12 of the National Monuments (Amendment) Act, 1994"*.
12. It should be an objective of the planning authority to *"secure the preservation in-situ of, or preservation by record of any sites and features of historical and archaeological interest"*.
13. It should be an objective of the planning authority to *"secure the preservation in-situ of, or preservation by record of any subsurface archaeological features that may be discovered"*

during the course of infrastructural/development works in the operational area of the Local Area Plan”.

14. Where a proposed development (excluding individual residential home units) includes a monument or site included in the Record of Monument and Places within the landholding, the Department recommends that *“The developer shall commission an archaeological assessment to establish the extent of archaeological material associated with the monument or site. This assessment shall also define the buffer area or area contiguous with the monument which will preserve the setting and visual amenity of the site”.*
15. Where a proposed development (excluding individual residential home units) includes a monument or site included in the Record of Monument and Places within the landholding, the Department recommends that *“The area of the monument and buffer should not be included as part of the open space requirement demanded of a specific development but should be additional to the required open space”.*
16. Where a proposed development (excluding individual residential home units) includes a monument or site included in the Record of Monument and Places within the landholding, the Department recommends the following policy be included *“Should a monument or place included in the Record of Monument and Places lie within the open space requirement for a development, a conservation plan for that monument should be requested as part of the landscape plan for that proposed open space”.*
17. Where a proposed development (excluding individual residential home units) includes a monument or site included in the Record of Monument and Places within the landholding, the Department recommends that *“Should a monument or site included in the Record of Monument and Places be incorporated into a development the monument and attendant buffer area should be ceded to Local Authority Ownership once the development and associated landscaping works are complete so that the future protection of the monument can be assured”.*
18. There are a number of Recorded Monuments within the operational area of the Monaghan County Development Plan. The location of these archaeological features should be clearly indicated in the Local Area Plan.
19. When making provision for the zoning of lands, due regard should be given to the specific objectives relating to Recorded Monuments and any other archaeological features as outlined above.
20. The Council should be aware of the stated policy of the Department with regard to the preservation in-situ of archaeological remains *“There should always be a presumption in favour of avoiding development impacts on the archaeological heritage. Preservation in-situ must always be the first option to be considered rather than preservation by record in order to allow development to proceed, and preservation in-situ must also be presumed to*

be the preferred option". (Framework and Principles for the Protection of the Archaeological Heritage, Duchas The Heritage Service, 1999).

21. It is a policy of the Department of Arts, Heritage and the Gaeltacht that proposed developments that may (due to their location, size or nature) have implications for the archaeological heritage should be subject to archaeological assessment. Such developments include *"Those developments located at or close to an archaeological monument or site, those that are extensive in terms of area (1/2 hectare or more) or length (1 kilometer or more) and developments that require an Environmental Impact Statement"*.
22. Archaeological heritage includes National Monuments in the care of the State, archaeological and architectural monuments and sites in the Record of Monuments and Places and the Register of Historic Monuments, zones of archaeological potential in Historic Towns, the underwater archaeological heritage, including Historic Wrecks, unknown and unrecorded archaeological sites (including subsurface elements with no visible surface remains) potential sites located in the vicinity of large complexes of site or monuments, present or former wetlands, unenclosed land, rivers or lakes or the inter tidal zone.
23. Table 23 of the SEA contains inaccuracies regarding National Monuments in State Care or Subject to Preservation Orders. Submission includes details of same.

Response of the Manager

1. Noted.
2. Noted.
3. Noted.
4. Noted.
5. Noted.
6. Noted.
7. It is recommended that reference to www.archaeology.ie, which provides up to date information regarding archaeological sites throughout County Monaghan, be included within Section 4.12.
8. Noted.
9. Noted.
10. It is considered that objective AHO 1 in Chapter Four is sufficient to address this issue. This objective affords for any additions by the National Monuments Service.
11. As point 10 above.
12. It is considered that objective AHO 2 in Chapter Four is sufficient to address this issue.

13. It is recommended that policy AHP 7 in Chapter Four be amended as follows
“Consider architectural value when considering proposals for public service schemes, electricity, sewage, telecommunications, water supply and proposed road schemes where these impinge on or are in close proximity to Recorded Monuments and Places and/or Areas of Urban Archaeology. *Where any subsurface archaeological features are discovered during the course of infrastructural/development works, these features should be preserved in-situ or preserved by record*”.
14. It is recommended that policy AHP5 in Chapter Four be amended as follows “When considering development in the vicinity of all archaeological monuments, the Planning Authority will require the preparation and submission of an archaeological assessment, detailing the potential impact of any development on both upstanding and buried structures and deposits. The report shall also include a visual assessment to ensure adequate consideration of any potential visual impact *and should define the buffer area or area contiguous with the monument which will preserve the setting and visual amenity of the site*”.
15. It is recommended that policy AHP3 in Chapter Four be amended as follows “When considering development in the vicinity of archaeological monuments, the planning authority will aim to achieve a satisfactory buffer area between the development and the monument in order to ensure the preservation and enhancement of the amenity associated with the monument. This should be achieved in consultation with the Department of Arts, Heritage and Gaeltacht. *The areas of the monument and buffer areas should not be included within the required open space area of any development but should be in addition to such requirements*”.
16. It is recommended that policy AHP3 be amended as follows “When considering development in the vicinity of archaeological monuments, the planning authority will aim to achieve a satisfactory buffer area between the development and the monument in order to ensure the preservation and enhancement of the amenity associated with the monument. This should be achieved in consultation with the Department of Arts, Heritage and Gaeltacht. *The areas of the monument and buffer should not be included within the required open space area of any development but should be in addition to such requirements. Where a monument or place included in the Record of Monument and Places lies within the open space requirement for a development, a conservation plan for that monument should be requested as part of the landscape plan for that proposed open space*”.
17. This is a matter for the Taking in Charge procedure.
18. The Record of Monuments and Places is included within Appendix Six.

19. Noted.
20. Noted.
21. It is considered that policy AHP5 is sufficient to address this issue.
22. Noted.
23. Noted. It is recommended that Table 23 in the Environmental Report is amended accordingly.

6.0 Appendix One

Changes to the Development/Zoning Matrix are indicated in red.

Table 8.1 Development/Zoning Matrix

A range of land uses are listed in Matrix Table below, indicating their broad acceptability in the different land use zones. A specific Development/Zoning Matrix for each of the proposed Local Area Action Plan areas will be produced within each Local Area Action Plan.

Land Use Zoning Objectives

TC	Town Centre	✓	Acceptable in Principle
ER	Existing Residential Lands	O	Open for consideration
PR	Proposed Residential Lands	✗	Not normally permitted
SR	Strategic Residential Reserve		
IE	Industry, Enterprise and Employment		
EC	Existing Commercial		
CS	Community/ Services/Facilities		
RA	Recreation and Amenity		
LP	Landscape Protection/Conservation		

Development Type	Land Use Zoning								
	TC	ER	PR	SR	IE	EC	CS	RA	LP
Abattoir	✗	✗	✗	✗	O	✗	✗	✗	✗
Advertising/Advertising structures	O	✗	✗	✗	O	O	✗	✗	✗
Agricultural Buildings	✗	✗	✗	✗	✗	✗	✗	✗	✗
Allotments	O	✓	✓	O	O	O	O	O	O
Amusement Arcade/Gaming Club	✓	✗	✗	✗	✗	✗	✗	✗	✗
Bank/Financial Services	✓	✗	✗	✗	✗	✗	✗	✗	✗
Bed & Breakfast/Guest House	✓	✓	✓	O	✗	✗	✗	✗	✗
Betting Office	✓	✗	✗	✗	✗	✗	✗	✗	✗
Boarding Kennels	✗	✗	✗	✗	O	O	✗	✗	✗
Business/Technology Park	O	✗	✗	✗	✓	O	✗	✗	✗
Builders Providers/Hardware Merchant	O	✗	✗	✗	✓	O	✗	✗	✗
Call Centre	✓	✗	✗	✗	✓	O	✗	✗	✗
Camping/Caravan Park	✗	✗	✗	✗	✗	O	✗	O	✗
Car Park/Park and Ride Facilities	O	✗	✗	✗	O	O	✗	✗	✗
Car Wash	O	✗	✗	✗	✓	O	✗	✗	✗
Cash & Carry/Wholesale Unit	O	✗	✗	✗	✓	✓	✗	✗	✗
Cemetery	✗	✗	✗	✗	✗	O	O	✗	✗
Church/Place of Worship	✓	O	O	O	✗	O	O	✗	✗
Cinema/Theatre/Bingo Hall	✓	✗	✗	✗	✗	✗	O	✗	✗
Community Facility	✓	O	O	O	✗	O	✓	✗	✗
Conference Facility	✓	✗	✗	✗	✗	O	O	✗	✗

Development Type	Land Use Zoning								
	TC	ER	PR	SR	IE	EC	CS	RA	LP
Creche/Day Nursery	✓	0	0	0	0	0	0	x	x
Cultural/Library/Museum/Gallery	✓	0	0	0	x	0	0	x	x
Disco/Nightclub/Dance Hall	✓	x	x	x	x	0	x	x	x
Doctor/Dentist/Health Practitioner	✓	0	0	0	x	0	✓	x	x
Drive Through	0	x	x	x	0	0	x	x	x
Education/Training	✓	x	x	x	0	✓	✓	x	x
Enterprise Centre	✓	x	x	x	✓	0	x	x	x
Factory Outlet/Retail Warehouse Club	✓	x	x	x	0	0	x	x	x
Farm Shop	✓	x	x	x	0	0	x	x	x
Fire / Ambulance Stations	x	x	x	x	✓	✓	x	x	x
Fuel Filling Station	0	x	x	x	0	0	x	x	x
Fuel Depot / Distributor	x	x	x	x	✓	0	x	x	x
Funeral Home / Mortuary	0	x	x	x	0	0	x	x	x
Garden Centre	✓	x	x	x	0	0	x	x	x
Golf Course	x	x	x	x	x	x	x	0	0
Health Centre	✓	0	0	0	x	0	0	x	x
Heavy Vehicle Park	x	x	x	x	✓	0	x	x	x
Hostel	0	0	0	0	x	x	x	x	x
Hot Food Take Away	✓	0	0	0	0	0	x	x	x
Hotel / Motel	✓	x	x	x	x	0	x	x	x
Industry (light)	x	x	x	x	✓	0	x	x	x
Industry (heavy)	x	x	x	x	✓	x	x	x	x
Offices (non ancillary)	✓	x	x	x	0	0	x	x	x
Park / Play Ground	✓	✓	✓	0	x	x	0	✓	✓
Pitch and Putt / Driving Range	x	x	x	x	0	x	0	✓	x
Playing fields	0	0	0	0	0	x	0	✓	0
Public House	✓	x	x	x	x	0	x	x	x
Public Transport Depot	0	x	x	x	✓	✓	x	x	x
Quarrying / Extractive Industry	x	x	x	x	x	x	x	x	x
Recreational Buildings	✓	0	0	0	0	0	0	x	0
Recreational Facility / Sports Club	✓	0	0	0	0	0	0	✓	0
Recycling Facility / Waste Transfer Site	✓	x	x	x	✓	0	x	x	x
Residential	✓	✓	✓	0	x	x	x	x	x
Residential Institution / Nursing Home	✓	0	0	0	0	0	x	x	x
Restaurant / Café	✓	0	0	0	0	0	0	x	x
Retail (Convenience)	✓	0	0	0	x	0	x	x	x
Retail (Comparison)	✓	x	x	x	x	0	x	x	x
Retail Warehouse	✓	x	x	x	✓	0	x	x	x
Residential/Retirement/Nursing Home	0	0	0	0	x	0	0	x	x
Science / Technology Enterprise	✓	x	x	x	✓	0	x	x	x
School	0	0	0	0	0	0	0	x	x
Taxi Office	0	x	x	x	0	0	0	x	x
Telecommunications	✓	0	0	0	0	0	0	0	x
Traveller Accommodation/Halting site	0	✓	✓	0	0	0	0	x	x
Transport/Haulage/Distribution Depot	x	x	x	x	✓	0	x	x	x
Tourist Facilities	✓	x	x	x	0	0	0	0	x
Veterinary Surgeon	0	x	x	x	✓	0	x	x	x
Vehicle Servicing & Repairs	x	x	x	x	✓	0	x	x	x
Vehicle Sales / Equipment Hire Centre	0	x	x	x	✓	0	x	x	x
Vehicle Breakers Yard	x	x	x	x	✓	x	x	x	x
Veterinary Surgery	0	x	x	x	0	0	x	x	x
Warehousing	0	x	x	x	✓	0	x	x	x
Wind Turbine	x	0	0	0	✓	✓	0	0	x
Workshop	x	x	x	x	✓	0	x	x	x