

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

Clones Town Manager's Report
on Submissions Received

26th November 2012



**Clones Town
Council**

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1.0 Introduction

The Draft Monaghan County Development Plan (Incorporating the draft Development Plans for the Towns of Monaghan, Carrickmacross, Castleblayney, Clones and Ballybay) 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 in the County Council Offices, the Town Council Offices and Branch Libraries between 31st May 2012 and 10th August 2012. 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 public meeting was held on the evening of 26th June 2012 in Clones to give the public an opportunity to discuss the draft plan with officials from the planning section. The main issue discussed at the public meeting was the Rural Area Under Strong Urban Influence surrounding Clones.

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 relating to the functional area of Clones Town Council:-

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1. Minister for Environment, Community and Local Government	4
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4.0 Summary of Submission from the Minister for the Environment, Community and Local Government and Response of the Manager

4.1 Submission Ref:	DCTDP9
Person/Body:	Minister for the Environment Community and Local Government
Location:	N/A
Core Issue:	Various

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. It is recommended that 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 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 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*”.
15. It is recommended that reference to the Departments ‘Planning System and Flood Risk Management’ Guidelines (2009) will be made in Section 8.4.6.
16. 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.
17. It is recommended that mention of the DECLG Guidelines “Spatial Planning and National Roads” (2012) be inserted into Section 15.21.
18. 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:	DCTDP1
	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. This matter 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.
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.
16. As point 4 above.
17. This issue is outside the remit of the Development Plan.
18. It is considered that Objective PSO2 sufficiently addresses this issue.

5.2	Submission Ref:	DCTDP2
	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. This is a matter for Monaghan County Council rather Monaghan Town Council.

15. Noted and agreed.
16. This is a matter for Monaghan County Council rather Monaghan Town Council.
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.
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.”

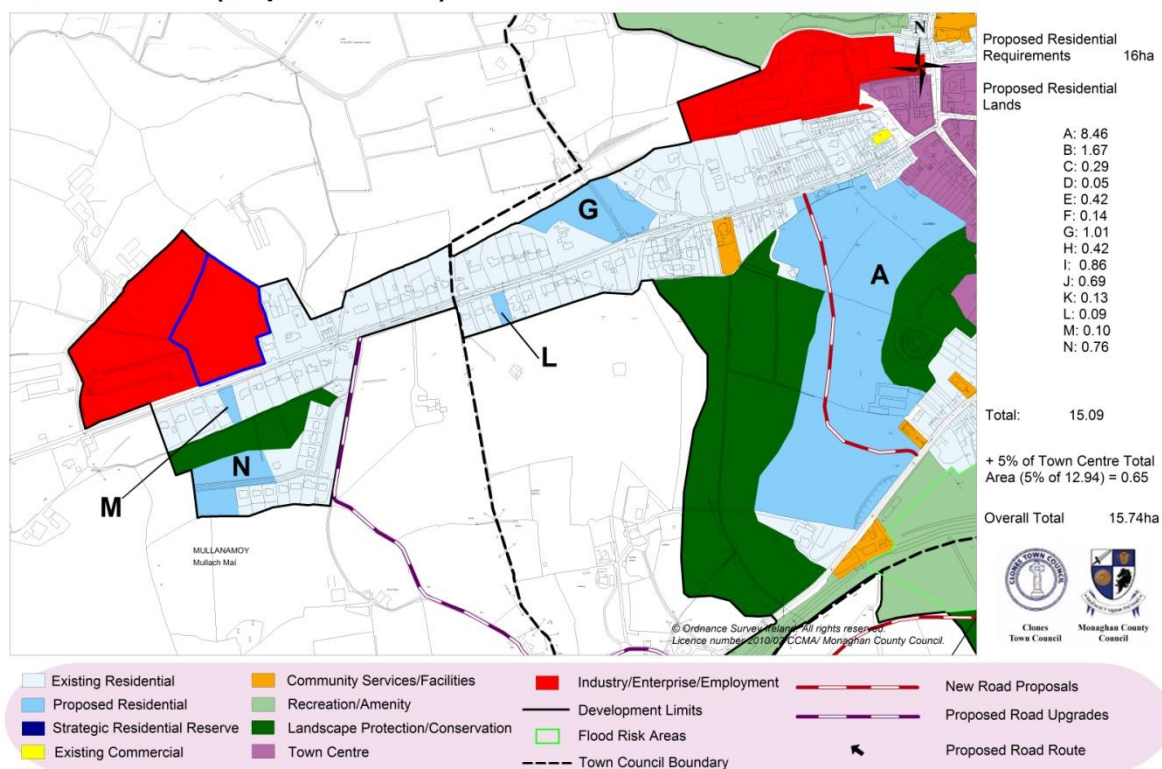
26. A revised Retail Development Strategy for County Monaghan is due to be published in early 2013.
27. This is outside the remit of county development plan.
28. It is recommended that the following statement be inserted at the end of Section 6.1 of the draft development plan ***“Key to the effective 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. This is a matter for Monaghan County Council rather Monaghan Town Council.
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 be 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.

5.3 Submission Ref: DCTDP3
 Person/Body: Mr and Mrs McCarville
 Location: Clones – Refer to Map DMCDP94
 Core Issue: Rezoning of lands from Industry, Enterprise and 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 about 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. The subject lands are within the functional area of Monaghan County Council and thus outside the remit of Clones Town Council.

5.4	Submission Ref:	DCTDP4
	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 goes, 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. This is a matter for Monaghan County Council and Monaghan Town Council rather than Clones Town Council.
2. This is a matter for Monaghan County Council and Castleblayney Town Council rather than Clones Town Council.
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.

5.5	Submission Ref:	DCTDP5
	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. It is recommended that Section 6.2.8 of the draft plan 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**

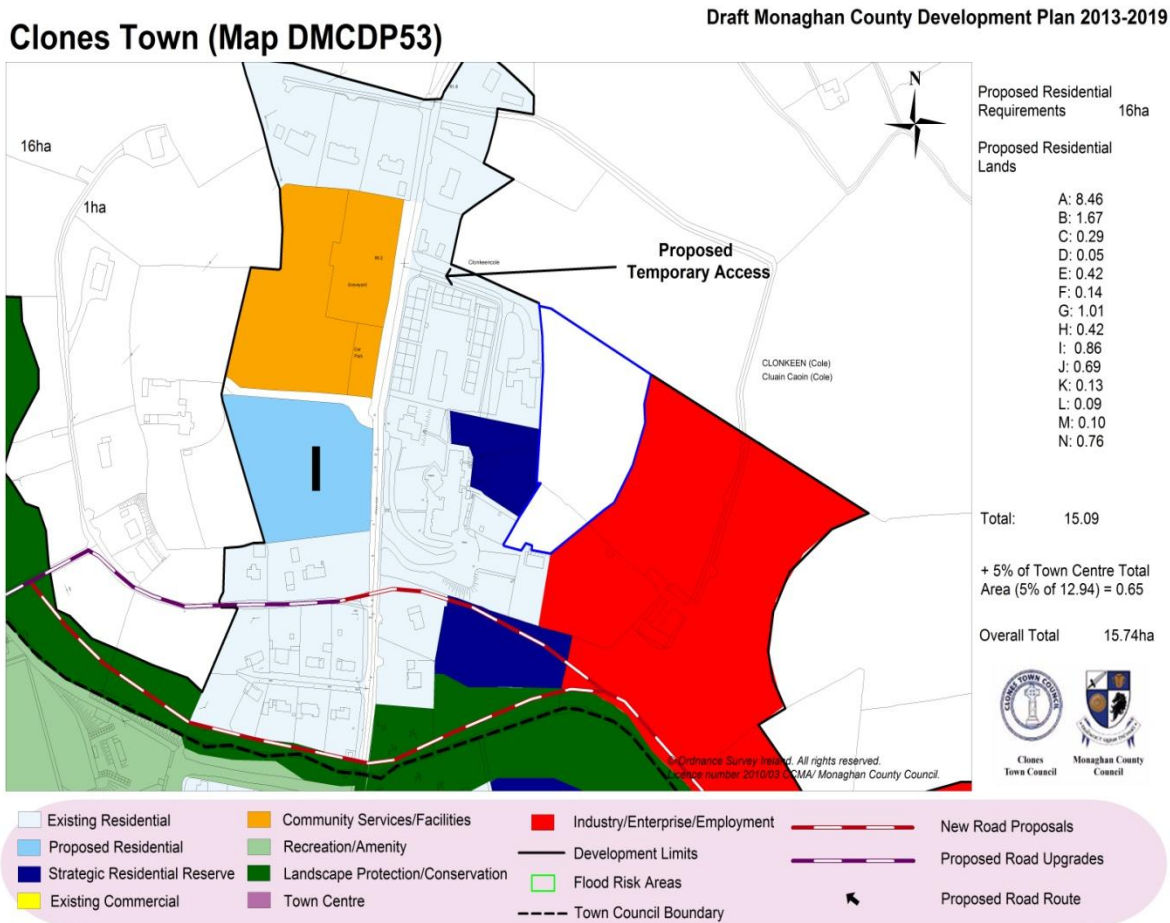
proposals within the functional areas that make up County Monaghan Local Authorities” should be included.

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. This is a matter for Monaghan County Council rather than Clones Town Council.
26. This is a matter for Monaghan County Council rather than Clones Town Council.
27. This is a matter for Monaghan County Council rather than Clones Town Council.
28. This is a matter for Monaghan County Council rather than Clones Town Council.
29. This is a matter for Monaghan County Council rather than Clones Town Council.
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. This is a matter for Monaghan County Council rather Monaghan Town Council.
34. This is a matter for Monaghan County Council rather Monaghan Town Council.

5.6 Submission Ref: DCTDP6
 Person/Body: Enda Connolly
 Location: Gortnawinney, Clones – see Map DMCDP53
 Core Issue: Zoning of Lands for Industry, Enterprise and Employment



Points Raised

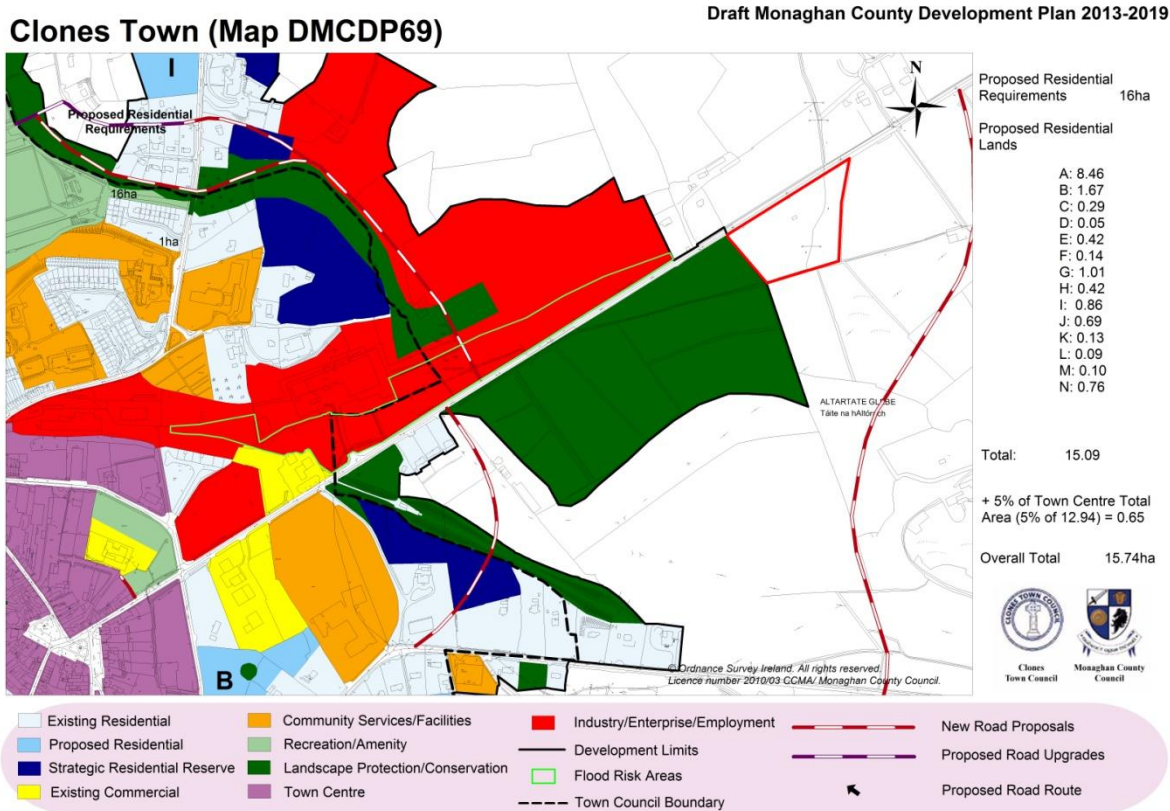
1. Consider including a further one acre (approx) of land to be designated for Industry/Enterprise/Employment, as outlined in blue on Map DMCDP53
2. The subject land is a narrow strip and the Draft Plan zoning could potentially isolate it from other agricultural land and therefore reduce its value in 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. The subject lands are within the functional area of Monaghan County Council and therefore fall outside the remit of Clones Town Council. However, 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.

5.7 Submission Ref: DCTDP7
 Person/Body: Enda Graham
 Location: Clones
 Core Issue: Zoning of Lands for Industry, Enterprise and Employment



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. The subject lands are within the functional area of Monaghan County Council and therefore fall outside the remit of Clones Town Council. However, 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.

5.8 Submission Ref:	DCTDP8
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 de-zoning, re-zoning 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.europa.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 (Incorporating the Development Plans for the Towns of Monaghan, Carrickmacross, Castleblayney, Clones and Ballybay) 2013-2019 do not have the potential for significant transboundary effects.
10. This is a matter for Monaghan County Council rather than Clones Town Council.
11. This is a matter for Monaghan County Council rather than Clones Town Council.
12. This is a matter for Monaghan County Council rather than Clones Town Council.
13. This is a matter for Monaghan County Council rather than Clones Town Council.
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 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. This is a matter for Monaghan County Council rather than Clones Town Council.
 25. This is a matter for Monaghan County Council rather than Clones Town Council.
 - 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 (Incorporating the Development Plans for the Towns of Monaghan, Carrickmacross, Castleblayney, Clones and Ballybay) 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 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. 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. This is a matter for Monaghan County Council rather than Clones Town Council.
60. This is a matter for Monaghan County Council rather than Clones Town Council.
61. This is a matter for Monaghan County Council rather than Clones Town Council.
62. This is a matter for Monaghan County Council rather than Clones Town Council.

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 in Chapter Four 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 (Incorporating the Development Plans for

the Towns of Monaghan, Carrickmacross, Castleblayney, Clones and Ballybay) 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.

5.9 Submission Ref: DCTDP10
Person /Body: Health Service Executive (HSE)
Location: Clones
Core Issue: General

Points Raised

1. Submission sets out the function of the Health Services Executive (HSE)
2. The HSE property portfolio in Clones comprises of Clones Health Centre and Clones Day Care Centre.
3. The draft plan identifies Clones as a disadvantaged border settlement where the regeneration strategy for the town has generated or supported development in recent years. HSE supports the regeneration strategy.
4. It is identified that a number of state-supported community bodies have been active in the town over the past decade in addressing the social and economic needs of the townspeople.
5. HSE supports Objective CLO8 in the Draft Town Plan which allows for the provision and expansion of a central multi purpose health centre in the town.
6. HSE also supports Objective CLO13 which seeks to encourage the cooperation of bodies responsible for the installation of infrastructural services as necessary for the implementation of the plan, and to see that those services shall be located where they will have least impact on the environment.
7. The HSE supports the zoning of Clones Health Centre and Clones Day Care Centre as Community Services/Facilities.
8. The HSE supports the zoning of some 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.
9. There should only be one entry for nursing homes in the development zoning matrix.
10. There should be a sub section after sub section 11.9.5 entitled 'Community and Social Infrastructure' with which health should be a major component.

Response of the Manager

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

5. Noted.
6. Noted.
7. Noted.
- 8. It is recommended that the zoning matrix be reviewed to correct any anomalies.**
- 9. As point 8 above.**
10. 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.

5.10	Submission Ref:	DCTDP11
	Person/Body:	Cootehill Area Development Limited
	Location:	Cootehill
	Core Issue:	General

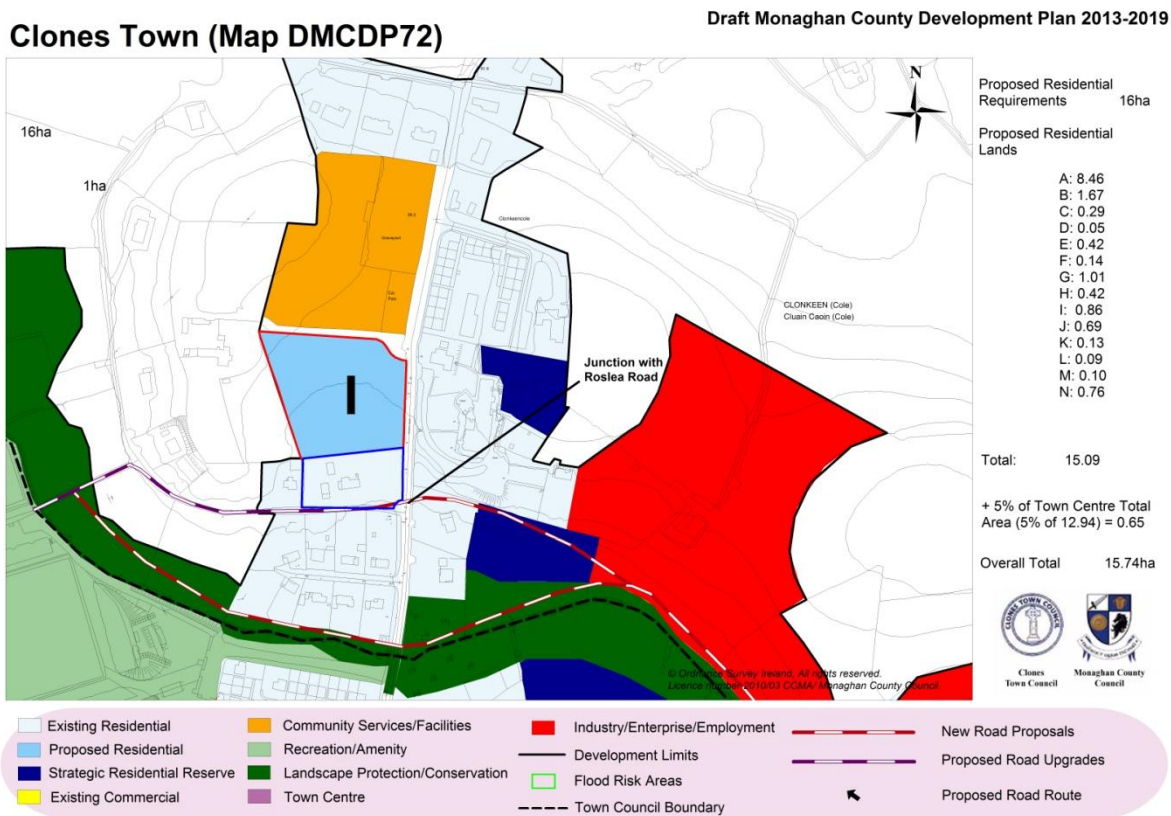
Points Raised

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 Abbots and Bord Gais that Natural Gas will be extended into Cootehill and Abbots by 23/08/2013.
6. More reference should be made to built heritage in Dartry and Ballamount 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. This is a matter outside the remit of the Clones Town Development Plan.
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. This is a matter outside the remit of the Clones Town Development Plan.
4. This is a matter outside the remit of the Clones Town Development Plan.
5. This is a matter outside the remit of the Clones Town Development Plan.
6. This is a matter outside the remit of the Clones Town Development Plan.
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.

5.11 Submission Ref: DCTDP12
 Person/Body: Arthur McMahon
 Location: Clonkeen Cole, Clones – see 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. Plot I is located in the functional area of Monaghan County Council and is therefore outside the remit of Clones Town Council. However, 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.
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. **As the road is within the functional area of Monaghan County Council, it has been recommended to that council that this proposed alternative road be excluded from the development plan.**
4. As point 3 above.
5. As point 3 above.

5.12 Submission Ref: DCTDP13
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.

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	0	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	✗	✗	✗	✗	0	✗	✗	✗	✗
Advertising/Advertising structures	0	✗	✗	✗	0	0	✗	✗	✗
Agricultural Buildings	✗	✗	✗	✗	✗	✗	✗	✗	✗
Allotments	0	✓	✓	0	0	0	0	0	0
Amusement Arcade/Gaming Club	✓	✗	✗	✗	✗	✗	✗	✗	✗
Bank/Financial Services	✓	✗	✗	✗	✗	✗	✗	✗	✗
Bed & Breakfast/Guest House	✓	✓	✓	0	✗	✗	✗	✗	✗
Betting Office	✓	✗	✗	✗	✗	✗	✗	✗	✗
Boarding Kennels	✗	✗	✗	✗	0	0	✗	✗	✗
Business/Technology Park	0	✗	✗	✗	✓	0	✗	✗	✗
Builders Providers/Hardware Merchant	0	✗	✗	✗	✓	0	✗	✗	✗
Call Centre	✓	✗	✗	✗	✓	0	✗	✗	✗
Camping/Caravan Park	✗	✗	✗	✗	✗	0	✗	0	✗
Car Park/Park and Ride Facilities	0	✗	✗	✗	0	0	✗	✗	✗
Car Wash	0	✗	✗	✗	✓	0	✗	✗	✗
Cash & Carry/Wholesale Unit	0	✗	✗	✗	✓	✓	✗	✗	✗
Cemetery	✗	✗	✗	✗	✗	0	0	✗	✗
Church/Place of Worship	✓	0	0	0	✗	0	0	✗	✗
Cinema/Theatre/Bingo Hall	✓	✗	✗	✗	✗	✗	0	✗	✗
Community Facility	✓	0	0	0	✗	0	✓	✗	✗
Conference Facility	✓	✗	✗	✗	✗	0	0	✗	✗

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	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