

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

Monaghan Town Manager's Report
on Submissions Received

19th November 2012



Monaghan 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 organised for the evening of 21st June 2012 in Monaghan to give the public an opportunity to discuss the draft plan with officials from the planning section.

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 Monaghan Town Council:-

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1. Border Regional Authority	8
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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:	DMTDP7
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:	DMTDP1
	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 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.

5.2	Submission Ref:	DMTDP2
	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. It is considered that the identification of a particular site for a primary school as requested would be restrictive and thus would be inappropriate. However, the amended Development/Zoning Matrix in the Appendix sets out that a school would be acceptable in principle on Community Services/Facilities and would be open for consideration on Town Centre, Existing Residential, Proposed Residential, Strategic Residential Reserve, Existing Commercial, and Local Area Action Plan zonings. Therefore given the range of land use zonings that a school could be possibly developed upon, it is considered that there is sufficient scope to permit the identification of a school site when the need arises. In the case of a school being developed upon Proposed Residential, an equivalent quantum of Strategic Residential Reserve would be converted to Proposed Residential by way of variation to ensure that the supply of housing land is not diminished.
2. This is a matter for Monaghan County Council and Castleblayney Town Council rather than Monaghan 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.

5.3	Submission Ref:	DMTDP3
	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. This is a matter for Monaghan County Council rather Monaghan Town Council.
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. This is a matter for Monaghan County Council rather Monaghan Town Council.
16. This is a matter for Monaghan County Council rather Monaghan Town Council.
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. This is a matter for Monaghan County Council rather Monaghan Town Council.
21. **It is recommended that Policy ASP14 be revised to read “The Council considers that finger post signs may be acceptable as an alternative to advertising signs where such advertising signs may detract from amenity or create a traffic hazard. Such signs shall be in accordance with the provisions of the National Roads Authority document “ Provision of Tourist and Leisure Signage on National Roads”**
22. **It is recommended that the thresholds set out in the NRA Guidelines are specifically referred to and that the third paragraph of Section 15.24 be revised to include “TTAs may be required in sub threshold cases as detailed in Section 2.2 of the NRA TTA Guidelines”.**
23. **It is recommended that the reference to NRA document DMRB HD 19/01 and HA 42/01 in respect of Road Safety Audits (RSA) in Section 15.25 and Appendix 10 be replaced by reference to NRA document HD 19/09 Road Safety Audit.**
24. **It is recommended that the second paragraph of Section 15.25 be amended to state “Road Safety Audits must be carried out in accordance with the NRA Design Manual for Roads and Bridges in relation to all planning applications involving a new entrance / intensification of an existing access onto a National *Primary* Road or a change to the existing layout of National *Primary* Road.”**
25. Noted and agreed.
26. This is a matter for Monaghan County Council rather Monaghan Town Council.
27. Noted and agreed.
28. This is a matter for Monaghan County Council rather Monaghan Town Council.
29. This is a matter for Monaghan County Council rather Monaghan Town Council.
30. Noted and agreed.
31. This is a matter for Monaghan County Council rather Monaghan Town Council.
32. This is a matter for Monaghan County Council rather Monaghan Town Council.
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.

5.4 Submission Ref: DMTDP4
Person/Body: Dublin Airport Authority
Location: N/A
Core Issue: General

Points Raised

The Dublin Airport Authority has no objections.

Response of the Manager

Noted.

5.5	Submission Ref:	DMTDP5
	Person/Body:	Inland Fisheries Ireland (Eastern River Basin District)
	Location:	N/A
	Core Issue:	Protection of Aquatic Habitats

Points Raised

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

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

Response of the Manager

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

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

5.6 Submission Ref: DMTDP6
Person/Body: Coolshannagh Walk Residents Association
Location: Coolshannagh
Core Issue: Provision of Play Area



Points Raised

Requests the identification of a portion of land in the development plan close to the estate for a play area as children have no safe area to play at the moment, and identifies a potential location or play area on lands zoned as Landscape Protection/Conservation in the draft plan.

Response of the Manager

It is recommended that the zoning remain as proposed as the zoning matrix (refer to Appendix One) does not preclude the development of a park or playground.

5.7	Submission Ref:	DMTDP8
	Person/Body:	Environmental Protection Agency
	Location:	N/A
	Core Issue:	Various

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 Monaghan Town Council.
11. This is a matter for Monaghan County Council rather than Monaghan Town Council.
12. This is a matter for Monaghan County Council rather than Monaghan Town Council.
13. This is a matter for Monaghan County Council rather than Monaghan 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 Monaghan Town Council.
 25. This is a matter for Monaghan County Council rather than Monaghan 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 Monaghan Town Council.
60. This is a matter for Monaghan County Council rather than Monaghan Town Council.
61. This is a matter for Monaghan County Council rather than Monaghan Town Council.
62. This is a matter for Monaghan County Council rather than Monaghan 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 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 envelope of Clones Town in the current development plan, the draft development no longer includes it within the settlement envelope. In addition, Policy WPP10 has been inserted within the draft development plan to ensure that development will not be permitted where there is a potential for a likely significant impact upon the groundwater or surface water supply to the Natura 2000 site. 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.

5.8	Submission Ref:	DMTDP9
	Person/Body:	Health Service Executive (HSE)
	Location:	N/A
	Core Issue:	General

Points Raised

1. Submission sets out the function of the Health Services Executive (HSE)
2. The HSE property portfolio in Monaghan Town comprises of Monaghan General Hospital, St Davnet's Campus, the Surgeon's Residence at High Street, and the National Learning Network Building (NTDI) at the Diamond Centre.
3. The services offered at Monaghan General Hospital are step down facilities, rehabilitation, day surgery, diagnostics and minor injuries. It is noted that Monaghan Hospital is zoned 'Community Services/Facilities' and that development types including doctor, dentist, health practitioner and health centre are now acceptable in principle on this land use zoning. The HSE supports this zoning.
4. The services offered at St Davnet's are care of the elderly, mental health services, primary care, and ambulance services. The St Davnet's Campus is zoned 'Community Services/Facilities'. The HSE seeks the retention of this land use zoning, however it considers that some of the lands within this campus to be surplus to requirement. Although there are no policies or objectives relating specifically to this site, it is noted that a Local Area Action Plan includes lands owned by the HSE at the rear of the northern side of Dublin Street, and there is a road proposal identified in Section 9.8.1 for the development of a link road from Roosky Vale to the rear of the northern side of Dublin Street. The HSE supports the zoning of the lands to the rear of Dublin Street as 'Town Centre' and the development of this access. However, the draft plan should include a provision to provide this access as soon as possible to unlock the development potential of this area.
5. The Surgeon's Residence is used for medical related offices and support services. The Surgeon's Residence is zoned 'Community Services/Facilities' and the building does not appear to be listed for statutory protection.
6. The National Learning Network Building (NTDI) is zoned 'Town Centre'.
7. The draft plan identifies Monaghan Town as a service centre with key facilities identified in Section 9.1.1 including the County Hospital and St Davnet's General Hospital and it is recognised that the town is a 'Hub' located strategically in the Border Area at the confluence of major strategic transport routes.

8. The Principle aim of the draft development plan is to develop critical mass in the town to ensure the retention of existing services, and reverse dispersal of population dependent on road transport.
9. Objective SSO2 should be amended to include 'community, health and social infrastructure'.
10. Objective SSO8 should be amended to include 'health and community'.
11. Objective SSO16 should be amended to include 'community, medical and health'.
12. Objective SSO18 should be amended to include a reference to the need for health, medical and care infrastructure to accommodate an aging population.
13. 'Health' and 'medical' should be included in the title of zoning objective G.
14. The HSE supports the zoning of many of its premises as Community Services and Facilities, however, the development of residential institutions / nursing homes on Community Service and Facilities zoning should be amended from not normally permitted to acceptable in principle, and on Town Centre zoning should be amended from open for consideration to acceptable in principle.
15. There should only be one entry for nursing homes in the development zoning matrix.
16. There should be a reference in Section 8.3.10 to major landowners within and adjoining these Local Area Action Plans (LAAPs) to allay fears about the formulation of these plans without consultation.
17. There should be a section on health and medical facilities in Chapter Seven.

Response of the Manager

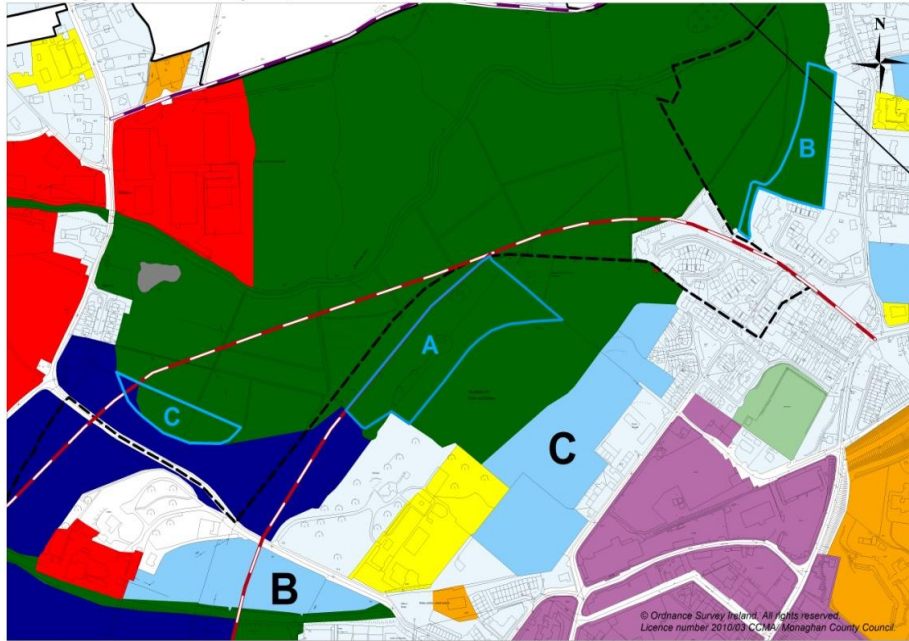
1. Noted.
2. Noted.
3. Noted.
4. Noted. Given the current restriction on financial resources it is not possible to given a time period for the construction of this access road.
5. Noted.
6. Noted.
7. Noted.
8. Noted.
9. It is considered that Objective SSO2 is sufficient in this regard.
10. It is considered that Objective SSO8 is sufficient in this regard.
11. It is considered that Objective SSO16 is sufficient in this regard.
12. It is considered that Objective SSO18 is sufficient in this regard.
13. It is considered that title of zoning objective G is sufficient in this regard.
14. It is recommended that the zoning matrix be reviewed to correct any anomalies.

15. As point 8 above.
16. The Local Area Action Plan has already been adopted as a variation to the Monaghan County Development Plan (Incorporating the Development Plan for Monaghan Town) 2007-2013. An extensive consultation process was undertaken with those affected land owners known to the planning authority.
17. 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.

5.9 Submission Ref: DMTDP10
 Person/Body: Nick Patton
 Location: Monaghan Town Refer to Map DMCDP60
 Core Issue: Zoning of Lands as Landscape Protection/Conservation and Realignment of Proposed N2-N54 Link Road.

Monaghan Town (Map DMCDP60a)

Draft Monaghan County Development Plan 2013-2019



Proposed Residential Requirements 47.4ha

Proposed Residential Lands

A:	6.13
B:	2.41
C:	4.49
D:	5.90
E:	0.38
F:	0.24
G:	0.23
H:	0.17
I:	8.26
J:	1.81
K:	1.03
L:	2.66
M:	1.55
N:	0.64
O:	0.52
P:	0.75
Q:	0.15
R:	0.94
S:	0.87
T:	0.67
U:	1.58
V:	3.99

Total: 45.37

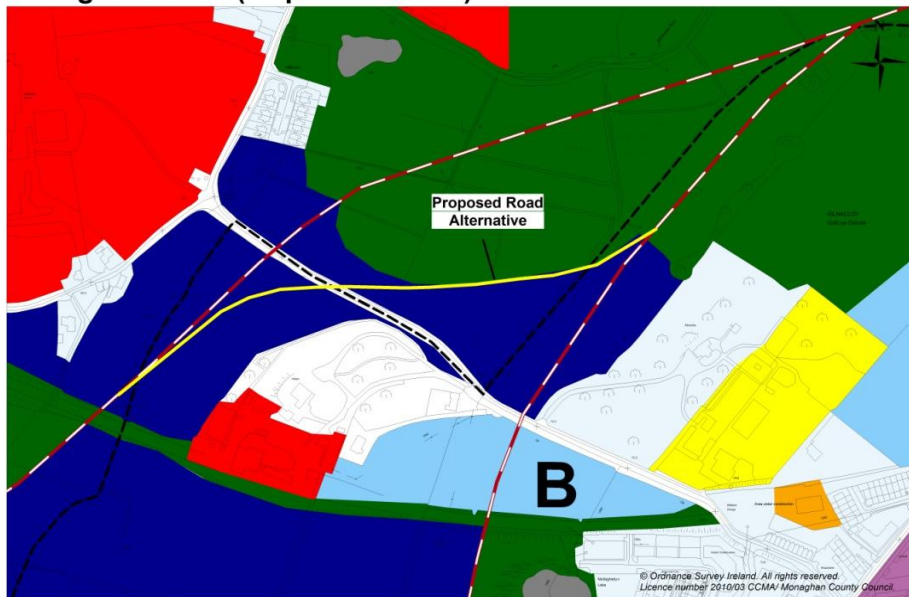
+ 5% of Town Centre Total Area (5% of 42.18) = 2.11

Overall Total 47.48ha



Monaghan Town (Map DMCDP60b)

Draft Monaghan County Development Plan 2013-2019



Proposed Residential Requirements 47.4ha

Proposed Residential Lands

A:	6.13
B:	2.41
C:	4.49
D:	5.90
E:	0.38
F:	0.24
G:	0.23
H:	0.17
I:	8.26
J:	1.81
K:	1.03
L:	2.66
M:	1.55
N:	0.64
O:	0.52
P:	0.75
Q:	0.15
R:	0.94
S:	0.87
T:	0.67
U:	1.58
V:	3.99

Total: 45.37

+ 5% of Town Centre Total Area (5% of 42.18) = 2.11

Overall Total 47.48ha



Points Raised

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

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

Response of the Manager

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

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

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

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

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