

Treanor, Bronagh

From: ForwardPlanning [ForwardPlanning@housing.gov.ie]
Sent: 17 May 2018 12:15
To: !devplan
Subject: DHPLG Submission on Draft Monaghan CDP 2019-2025
Attachments: DHPLG Submission to LA 17 May 2018 - Draft Monaghan CDP.pdf; ATT00001.txt; ATT00002.htm

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A Chara

Please find attached submission from the Department of Housing, Planning & Local Government on the Draft Monaghan County Development Plan 2019-2025.

I would be very grateful for confirmation of receipt of the attached submission.

Kind regards

Ciara Gilgunn

Ciara Gilgunn
Forward Planning Section

Planning & Housing Market Policy and Land Management Division | Department of Housing, Planning and Local Government | Custom House | Dublin 1 | +353 (0) 1 8882000



Seirbhís ar scoth an domhain a chur ar fáil don Stát agus do mhuintir na hÉireann.



**An Roinn Tithíochta,
Pleanála agus Rialtais Áitiúil**
Department of Housing,
Planning and Local Government

**Rebuilding
Ireland**

Action Plan for Housing and Homelessness

SCANNED



17 May, 2018

Monaghan County Council,
Forward Planning Team,
Planning Section,
County Offices,
The Glen,
Monaghan.

Re: Draft Monaghan County Development Plan 2019-2025

A Chara,

I am directed by the Minister for Housing and Urban Development to refer to your recent letter in relation to the above and set out hereunder observations on behalf of the Minister.

The Department of Housing, Planning and Local Government has reviewed the Draft Monaghan County Development Plan 2019 – 2025 (herein referred to as the Draft Plan) and considers that it provides a strategic framework for the proper planning and sustainable development of the area and gives spatial expression to the economic, social, cultural and environmental aims of the county.

Your authority is also requested to address the following matters to ensure that the draft plan fully complies with the legislative and policy framework for planning, the **main topics** being as follows;

Ensuring an appropriate density and form of urban development

While acknowledging the fact that Monaghan is a largely rural county, the proposed provisions of the plan with respect to securing an appropriate density of development and as expressed within the core strategy and Section 3.2.2 of the Draft Plan, do not fully comply with the requirements of relevant guidelines issued by the Minister under Section 28 of the Planning and Development Act 2000 (as amended).



For example, the draft plan proposes densities for the majority of proposed residential units at 20 units per hectare within Monaghan Town, Carrickmacross and Castleblayney and 15 units per hectare within Clones, Ballybay and the villages.

Such densities are very low and inconsistent with compact urban development. Moreover, the Department's statutory S.28 Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, 2009, encourage densities of 30 – 40 units per hectare within existing settlement centres and 20 – 35 outside centres.

While it is accepted that higher densities may not be appropriate in all locations due to the rural character and fabric of the county, the Department strongly recommends increased densities, where appropriate, especially within the urban envelope of Monaghan Town, Carrickmacross and Castleblayney.

In this regard, your authority is respectfully requested to re-examine and revisit this aspect of the draft plan in order to ensure its policies are in line with the guidelines above.

Industry / Enterprise / Employment Zonings

The Department strongly supports the aims of the draft in further strengthening and developing the economic and employment base of County Monaghan, noting that it identifies c.539 hectares of Industry/Enterprise/Employment zoned lands for Monaghan, Carrickmacross, Castleblayney, Clones and Ballybay with the breakdown of same as follows.

Monaghan Town:	224ha
Carrickmacross:	115ha
Castleblayney:	127ha
Clones:	43ha
Ballybay:	30ha

The proposed zoning objectives for employment related uses are significant additions to the towns in question particularly Monaghan Town, Carrickmacross and Castleblayney.



The proposed zonings appear substantially larger than what has been provided historically within each of the five towns listed above, and which have been partially developed to date thereby potentially giving rise to the scope for ad-hoc and piecemeal development to the detriment of both co-ordination in infrastructure provision and effective place-making.

In this regard, your authority is requested to (a) set out a more effective rationale for such objectives, by reference to effective demand for such development lands and (b) set out a phasing and infrastructure delivery plan for such objectives, taking account of the sequential approach to development required by the Development Plans Guidelines (2007).

There are also *minor observations* mainly relating to updating the draft plan with recently published national planning policy and guidelines as follows:

National Planning Framework

Section 1.12 of the draft plan briefly mentions the National Planning Framework (NPF). The NPF was published in February 2018 under Project Ireland 2040 and contains 10 National Strategic Outcomes and numerous National Policy Objectives. Therefore, it would be appropriate to reference the NPF in greater detail than what is currently provided for in the draft thereby ensuring that the Monaghan County Development Plan is consistent with the National Policy Objectives (NPOs) as contained in the NPF.

It would be particularly useful to reiterate certain NPOs as they relate to particular sections and subjects throughout the plan. In particular, the Department recommends removing the reference to 'hub town' and the National Spatial Strategy within Section 2.3.2 and replace with referencing the NPF. Section 2.4.2 Housing Land Requirement could also be retitled as Housing Need Demand Assessment to be consistent with NPO 37 of the NPF.

Regional Spatial and Economic Strategies (RSESs)

Section 4.3 of the draft plan relates to the Regional Planning Guidelines (RPGs), which are due to be replaced imminently by the Northern and Western Region RSES. Therefore, it would be appropriate, at this stage, to reference the RSES rather than the RPGs.



River Basin Management Plan

The River Basin Management Plan (RBMP) was launched in April 2018. The Plan outlines the measures the State and other sectors will take to improve water quality in Ireland's groundwater, rivers, lakes, estuarine and coastal waters over the next four years. The Government aims to protect and improve water quality in 726 of Ireland's 4,829 water bodies over the next four years. The Plan is in fulfillment of requirements under the Water Framework Directive (WFD). The draft plan needs to be updated to reflect the status and in accordance with the RBMP within Section 8.2 & 8.5 and where necessary within the Draft and Environmental appendices.

OPW Flood Mapping and Flood Risk Management Plans

In April 2018, the Flood Risk Management Plans and associated flood maps produced by the Office of Public Works (OPW) through the CFRAM Programme and parallel projects were approved by the Minister for Public Expenditure and Reform and are now finalised. Your authority should update the draft plan and appendices accordingly, particularly Section 8.33 and the Strategic Flood Risk Assessment. The Department specifically recommends the inclusion of a policy to ensure that zoning for vulnerable uses will avoid Flood Zones A or B.

The Sustainable Urban Housing: Design Standards for New Apartments, 2018 should be referenced particularly within section 5.7 of the draft plan.

The officials of the Department are available to discuss the matters raised above and in the first instance you are advised to contact Ms. Laura Courtney, Planning Adviser on 01-8882203.

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Niall Cussen
Chief Planner,
Forward Planning Section