



FJ Coyle & Associates

Civil & Environmental Consultants

Offices:
3 High Street,
Monaghan
Co. Monaghan

Unit One,
Limegrove,
Ballinlough
Co. Roscommon

Tel: 047-72175
Fax: 047-77944
E-mail: info@fjcoyle.ie
www.fjcoyle.ie

Monaghan County Council
Glen Road
Monaghan
County Monaghan

Our Ref: 15138B18PCJMG001



24th May 2018

Client(s): Barry Aughey

Dear Sir/Madam,

Please find enclosed 4no submissions on the Draft Monaghan CoCo 2019-2025 Development Plan.

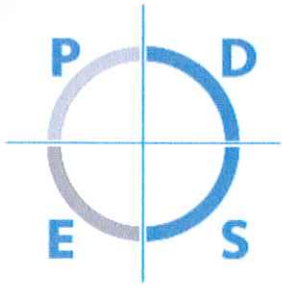
I would note that our Client was not made aware of any changes to the zoning of lands in their ownership and a result of the preparation of the draft Development Plan. Can all correspondence relating to this submission be forwarded to the above address.

Trusting the above is to your satisfaction should you have any further queries please do not hesitate to contact the undersigned.

Yours sincerely,

Peter Coyle, CEng, BEng MIEI,
Chartered Engineer

For and on behalf of FJ Coyle & Associates



CHARTERED PLANNING CONSULTANTS

**PLANNING SUBMISSION RE
DRAFT MONAGHAN COUNTY
DEVELOPMENT PLAN 2019-2025**

In respect of
**LANDS AT CARN,
CLONES**

Prepared by
PDES PLANNING CONSULTANTS

On behalf of
DANHALL LTD

MAY 2018

1.0 Introduction

We have been instructed to make this submission on behalf of our client, Danhall Ltd, in respect of lands at Carn, Clones Town.

This submission is made in response to the public notice dated 15th March 2018, inviting submissions up until 25th May 2018 in relation to the draft Monaghan County Development Plan 2019-2025.

In summary, this submission requests the following:

-That the Planning Authority amend the settlement envelope for Clones town and include the subject lands of 1.05 ha to be zoned as 'proposed residential' within the settlement envelope.



Figure 1: Subject lands for reference purposes (source: Arcgis map viewer)

2.0 Current planning context

The subject lands are noted zoned as being outside the settlement envelope for Clones town under the 2013-2019 Plan and located inside the former Clones town council boundary.

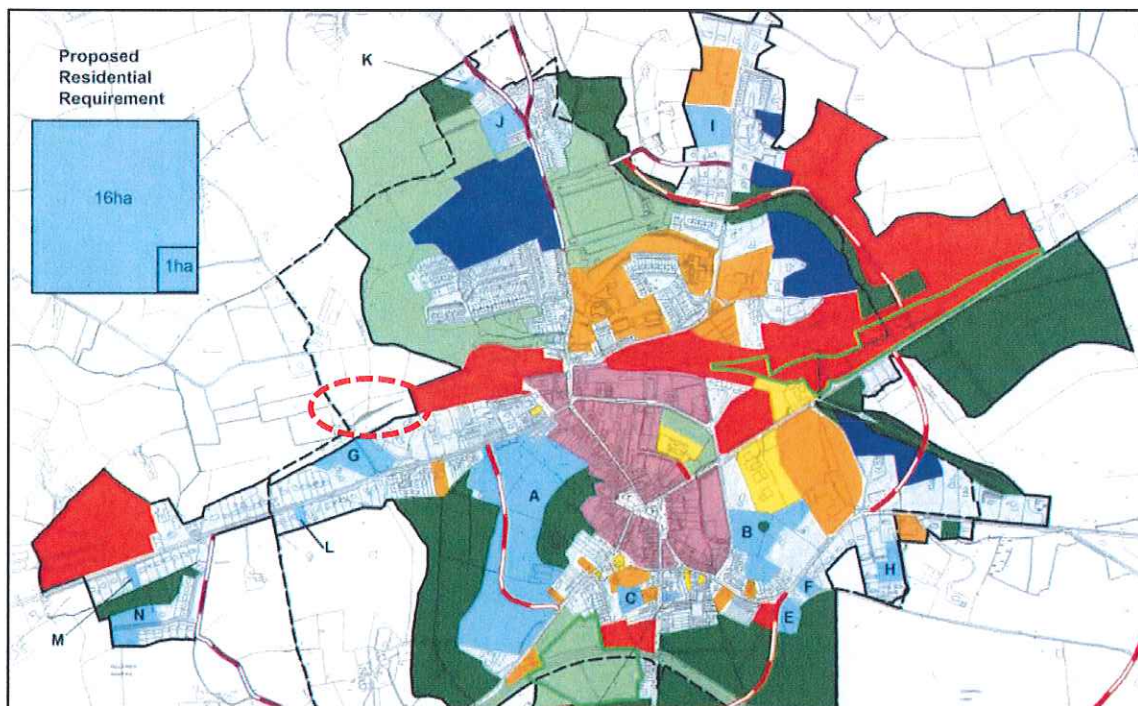


Figure 2 Zoning map as per Monaghan County Development Plan 2013-2019 showing the submission lands. (source: Monaghan County Development Plan)

On referencing the draft Clones town plan 2019-2025 as proposed we note 20% of the existing housing stock is detailed as vacant and there is an ongoing trend of population decrease. Dereliction is also recognised as an issue within the town and the plan correctly identifies under section 13.6 that *“if the current trend of a declining urban population continues there is a significant danger that existing and traditional services will withdraw from the town”*.

In this context, we note figure 2.1 of the draft plan correctly identifies the high levels of rural housing in the hinterland surrounding Clones town; this unsustainable approach of excessive persons living in rural areas requires to be addressed and is planning matter recognised by the Regional Planning Guidelines.

Specifically the RPG's state *“Dispersed settlement patterns and low population density pose significant challenges from an infrastructure and service delivery perspective. However, population growth has mainly taken place on the periphery of towns and villages, often at the expense of the urban core. This pattern of development and sprawl creates significant challenges for the delivery of services within local authorities”*.

In this context we note the strategic core strategy policies put forward in the draft plan (CSP1-CSP8) recognise this need to strengthen the towns/settlements and we consider these strategic objectives to be appropriate.

In response we submit the role of the draft 2019-2025 Monaghan County Development Plan and the core strategy set out therein should be to address this unsustainable urban vs rural population divide and instead provide for sustainable use of lands in urban locations, particularly on lands which are serviceable.

3.0 Site location and context

In terms of context we submit the subject lands are conveniently located adjacent to the existing public roads, offering direct access to the regional road network which has adequate capacity for any traffic generated from residential use. It is a strategically well-located site.

The subject lands are also within walking distance of Clones town centre and nearby schools.

The zoning of the lands for 'proposed residential' will be consistent with the urban form as established and not represent urban sprawl, given existing developments are located at further distance(s) to the west along Newtownbutler Road from the town centre boundaries and the nearby amenities aforementioned. Given the existing building on-site it is to be regarded as both 'brownfield' and an 'infill' parcel of lands.

We submit the subject lands are therefore to be regarded as 'serviceable lands' as defined in appendix 1 of the National Planning Framework and should be given priority in terms of zoning through the development plan process.

4.0 Other matters

4.1 Zoning overview

We note under the 2013-2019 County Development Plan the following zonings in Clones provide for:

- **16 ha for proposed residential**
- **35 ha for industry, enterprise & employment.**

However on review of the draft 2019-2025 County Development Plan as published the comparative zonings provide for:

- **13ha in total for proposed residential (which also incorporates phasing provisions under residential 'B'; as per table 2.5 of the draft plan)**
- **43 ha for industry, enterprise & employment.**

In response, we submit:

- The increase in zoning for industry, enterprise & employment from 35ha under the 2013-2019 County Development Plan to 43 ha as now proposed under the draft

2019-2025 County Development Plan represents a 22.85% increase in lands for industry, enterprise & employment;

- This 22.85% increase in lands for industry, enterprise & employment is welcomed and will facilitate a sustainable use of urban lands. However, to facilitate any increase in employment uses or zonings within Clones, it is also proper planning to facilitate provision of adequate lands for future residential purposes. In this regard we submit the incorporation of residential sequential zonings as proposed is too restrictive going forward.

4.2 National Planning Framework

The National Planning Framework sets out strategic objectives which Planning Authorities are to have regard to. Specifically we highlight:

Objective 3a *"To deliver at least 40% of all homes Nationally within the built-up footprint of existing urban settlements"*.

Objective 5 *"To develop cities and towns of sufficient scale and quality to compete internationally and be drivers of national and regional growth, investment and prosperity"*.

Objective 7 *"Reversing the stagnation or decline of many smaller urban centres, by identifying and establishing new roles and functions and enhancement of local infrastructure and amenities"*; and

"Encouraging population growth in strong employment and service centres of all sizes, supported by employment growth".

"In more self-contained settlements of all sizes, supporting a continuation of balanced population and employment growth".

Also of relevance is under appendix 3 of the NPF which sets out a tiered approach to zoning of lands. In summary:

- (I) Serviced lands should be identified;
- (II) Serviceable lands should be identified.

We submit the NPF sets out a clear policy direction for strengthening of existing urban areas and a move away from rural based one-off housing. Use of infill/brownfield sites is advocated and the tiered approach to zoning of lands set out.

Planning Authorities through the plan process should identify 'serviced lands' and consider same as a priority through the development plan process.

We submit this is considered to be sustainable in planning and land-use terms and sets a clear policy context which core strategies should be based on by all Planning Authorities.

4.3 Core strategy

We note the draft County Development Plan 2019-2025 incorporates the core strategy pursuant to the requirements of section 10 of the Planning and Development Acts. The strategic objectives are noted which in the broadest sense are to provide for new development in a sustainable manner.

In light of the NPF as published, we submit the rationale and zoning provisions set out in the core strategy should be revised, particularly given the policy context provided by the NPF which seeks to strengthen urban areas and existing lands.

We also note the requirement of the core strategy to be consistent with the Regional Planning Guidelines (RPG's), and the population growth forecasts set out therein for the county. In this context we consider the draft County Development Plan 2019-2025 should:

- place greater emphasis on zoning lands in existing urban areas;
- place greater restrictions on single rural housing.

This approach will allow for the population growth forecasts for the County as set out in the RPG's to be adhered to; and also ensure that the NPF objectives are met; ie objectives 3, 5 & 7 of the NPF as previously identified to be met.

Further, we also submit the assumed population growth of 1.04% is considered to be too conservative and is based on 'distorted' local population growth rates which occurred during the 2008-2015 economic recession (and previous periods of high unemployment), when net migration was ongoing.

In this context we highlight the document as published "*Prospects for Irish Regions and Counties*" as published January 2018 (by the ESRI in conjunction with the NPF publication) which provides detailed up-to-date analysis of population growth rates. Specifically we highlight the following tables as extracts:

	1991-1996	1996-2002	2002-2006	2006-2011	2011-2016	1991-2016
Border	0.2	1.0	2.1	2.0	0.3	1.2
Midland	0.3	1.6	2.9	2.4	0.7	1.8
West	0.5	1.3	2.2	1.5	0.4	1.3
Dublin	0.6	1.0	1.4	1.4	1.1	1.2
Mid-East	1.4	3.1	3.0	2.3	1.1	2.9
Mid-West	0.4	1.2	1.6	1.0	0.3	1.0
South-East	0.4	1.4	2.2	1.6	0.5	1.3
South-West	0.5	1.0	1.8	1.4	0.8	1.2
State	0.6	1.3	2.1	1.6	0.7	1.4

Source: Author's calculations using CSO Census of Population data.

Table 2 Average annual population growth by region and period (Source: *Prospects for Irish Regions and Counties* table 3.2)

	1991-1996	1996-2002	2002-2006	2006-2011	2011-2016	1991-2016
Carlow	0.3	1.8	2.4	1.7	0.8	1.6
Dublin	0.6	1.0	1.4	1.4	1.1	1.2
Kildare	2.0	3.6	3.4	2.6	1.1	3.2
Kilkenny	0.5	1.1	2.2	1.8	0.8	1.4
Laois	0.2	1.8	3.5	4.0	1.0	2.5
Longford	-0.1	0.5	2.7	2.7	0.9	1.4
Louth	0.3	1.7	2.3	2.1	0.9	1.7
Meath	0.8	3.7	5.4	2.6	1.2	3.4
Offaly	0.2	1.3	2.8	1.6	0.3	1.3
Westmeath	0.5	2.2	2.6	1.7	0.5	1.7
Wexford	0.5	2.0	3.2	2.1	0.6	1.9
Wicklow	1.1	1.9	2.5	1.7	0.8	1.9
Clare	0.7	1.6	1.9	1.1	0.2	1.2
Cork	0.5	1.1	1.9	1.6	0.9	1.3
Kerry	0.7	0.8	1.4	0.8	0.3	0.8
Limerick	0.4	1.0	1.2	0.8	0.4	0.8
Tipperary N.R.	0.1	0.9	2.1	1.3	0.3	0.9
Tipperary S.R.	0.2	0.8	1.3	1.3	0.1	0.8
Waterford	0.7	1.2	1.6	1.1	0.5	1.1
Galway	0.9	1.8	2.7	1.6	0.6	1.7
Leitrim	-0.2	0.5	3.1	2.0	0.1	1.1
Mayo	0.1	0.9	1.4	1.1	0.0	0.7
Roscommon	0.8	0.6	2.3	1.8	0.1	1.0
Sligo	0.4	0.7	1.2	1.5	0.0	0.8
Cavan	0.1	1.1	3.3	2.9	0.8	1.8
Donegal	0.3	1.0	1.8	1.9	-0.3	1.0
Monaghan	0.0	0.4	1.6	1.6	0.3	0.8
State	0.6	1.3	2.1	1.6	0.7	1.4

Table 3 Average annual population growth by region and period (Source: *Prospects for Irish Regions and Counties* table 3.2)

As can be seen from the above tables, the average annual growth rate for the border region was 2.0% pre-recession, and in Monaghan the growth rate was 1.6%. Notably this research is up-to-date and more relevant than 'projections' as set out in the RPG's dated 2010, as it takes into account census data of 2011 & 2016.

Also of note is the growth rate at state level during the recession 2011-2016 which is detailed at 0.7%. In the broadest sense this is largely attributable to net migration and the recession.

In this context and the vastly improved economic scenario we consider the assumed growth rate of 1.04% as set out in the draft plan is therefore too restrictive, with the consequence that inadequate lands have been proposed for housing in the broadest sense.

We submit a revised assumed population growth projection for the county should therefore be revised upwards to at least 1.6%, given the vastly improved economic conditions which result in improved employment prospects and the associated improvement in bank lending for provision of housing units. We highlight this suggested growth rate is based on reference to what has been the historical growth rates for the county as shown in table 3 above.

In accordance with objectives 3, 5 & 7 of the NPF, we also consider this % increase should be prioritised in terms of allocating lands for housing within existing urban areas; ie. at least 40% to be provided for in existing urban areas as per the NPF objectives.

At a County level the core strategy and rural housing policy should therefore be configured to encourage at least 40% of future population growth and housing requirements into urban areas.

4.4 Core strategy implications for Clones town

On referencing the core strategy as set out in the draft plan, we note population growth projections are provided for the town's population are stated to grow to a target population of 2017 by 2025. (ie 337 persons over a six year period). In the broadest sense we consider this results in a lack of lands being zoned as available for either proposed residential as set out in the core strategy both due to:

- the conservative 1.04% assumed growth rate suggested provides for an additional 337 persons over a six year period; and also
- the revised policy direction with the NPF sets out under objective 3a "*To deliver at least 40% of all homes Nationally within the built-up footprint of existing urban settlements*" which has not been factored into the Core Strategy to date.

In response we suggest the following be addressed at plan preparation stage:

- Of note is figure 3.2 in the Regional Planning Guidelines which sets out the population targets for the County until 2022. Specifically it sets out that by 2022 the target population for the County is **71,400**.
- We highlight this to demonstrate both the target population by 2022 as per the RPG's and also for the Planning Authority to note that the draft plan is required to allocate lands beyond 2022; ie until 2025. We submit that applying an assumed growth rate of 1.04% therefore has implications that the core strategy would not be consistent with the RPG's and population targets set out therein.
- We highlight the specific policies as set out in the RPG's to be complied with; namely CSP4-CSP10. The target population as set forward in the core strategy and HLR's are therefore considered to fall short of what is envisaged by the RPG's.

In response to the NPF and the target population set out in the RPG's we submit:

- At a county level under the core strategy, the population allocation/HLR's should be consistent with objective 3a of the NPF in the first instance; ie at least 40% of population growth/HLR calculations to be allocated primarily to existing urban settlements.
- HLR's in existing urban areas should be prioritised in land-use terms and policy change incorporated into the development plan for all rural housing applications so that 'actual need' is incorporated into rural housing policy; this is consistent with the Section 28 Guidelines 'Sustainable Rural Housing: Guidelines for Planning Authorities'.
- The growth rate for the county should be increased to a minimum of 1.6% per annum; **this equates to a total of 70,813 persons at County Level by 2025.**

- This represents an increase at county level of 3561 above the figures at county level as suggested in table 2.0 of the core strategy. (ie 70,813 rather than the stated 67,252 population target).

		Assuming a 1.04% per annum growth	Assuming a 1.6% per annum growth	RPG Target Population
Current Position	2016 Population	61,386 persons	61,386 persons	66,124
Plan Period Projected Growth 2019-2025	Total Population of County by 2025	67252 persons	70,813 persons (by 2025)	71,400 (by 2022)

Table 3 Population growth based on a 1.6% per annum (compound)

Applying our suggested population increase rate of 1.6% has implications for the Housing Land Requirement for all settlements in the county. Specifically in terms of Clones town we submit:

- The population target of 70,813 results in a forecast population increase within Clones town to increase above calculations as forecast by an additional minimum of 106 persons (ie. 2124 total persons rather than 2018 as forecast). This is based on an allocation of 3% of target population for the county. (as per table 2.1 of the core strategy)
- A population target increase of 444 persons for Clones town results in a requirement for at least 162 housing units; (ie. based on an assumed household size of 2.75 persons as stated by the CSO in 2017)

In total, we submit a 162 housing unit requirement for Clones town equates to **9.78 ha of zoned lands for 'proposed residential'** in Clones. (based on an average density throughout residential lands of 16.5 units per ha).

In this regard, we note the draft plan encompasses 'proposed residential' zoning on 8no. parcels of lands which total 7.95ha.

We highlight the following analysis of 'proposed residential' zonings for ease of reference:

Location	Area (ha)
Parcel 3	0.68
Parcel 4	1.56
Parcel 5	0.14
Parcel 6	3.64
Parcel 8	1.64
Parcel 9	0.08
Parcel 12	0.1
Parcel 13	0.11
Total	7.95

Table 4: Land parcels identified as proposed residential under the draft Clones town development plan 2019-2025 (parcels identified are referenced to the land parcels as scheduled on the proposed zoning map as below)

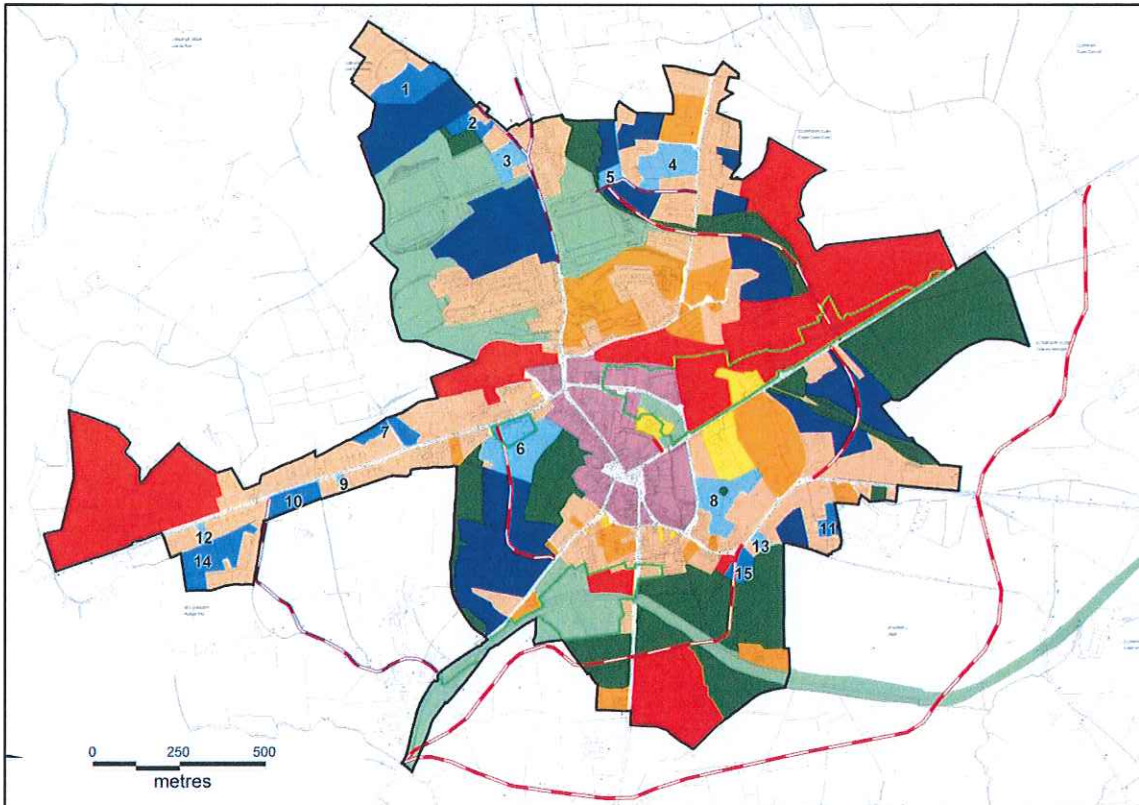


Figure 3 Settlement envelope and zonings proposed for Clones town under the draft development plan 2019-2025 (source: draft Monaghan County Development Plan 2019-2025)

In this context we submit the lands set out in the draft plan for proposed residential do not provide adequate lands for future population growth or housing unit requirements within Clones town as 'first phase'. **As a minimum an additional 1.83ha of lands should be included as 'proposed residential'.**

We also submit our suggested HLR of 9.78ha for 'proposed residential' fails to take account of:

- any 'headroom provision' as required under CSP5 of the RPG's;
- any 'low density' or 'serviced site' zonings which may be below a density of 16.5 units per ha.

Notwithstanding the provision of proposed phased zonings which incorporate 'proposed residential B' or 'strategic residential reserve' we submit in the first instance the draft plan should take account of our suggested future population growth figures and zone adequate lands in the first instance as 'proposed residential'.

4.5 Housing lands allocation and location

In terms of actual lands identified under the draft Clones town plan 2019-2015, we note the HLA allocation (7.95ha) for proposed residential within Clones is not taking account of the logical sequential approach required under CSP3 & CSP9 of the RPG's. Specifically we note parcels of lands have been zoned as 'proposed residential' which are located a further distance from the town centre than our client's lands.

For ease of reference we set out below



Figure 3 Context location plan denoting 1.2km radius from Clones Town Centre and subject lands which are located within the 1.2km radius from Clones town centre (source: arcgis map viewer)

On referencing the proposed settlement envelope and proposed housing zonings we note the following parcels of 'proposed residential' are located at a further distance from the town centre than our client's lands:

- parcel 3 at Lissegerton;
- parcels 4 & 5 at Clonkeen;
- parcels 9 & 12 on the Newtownbutler Road;

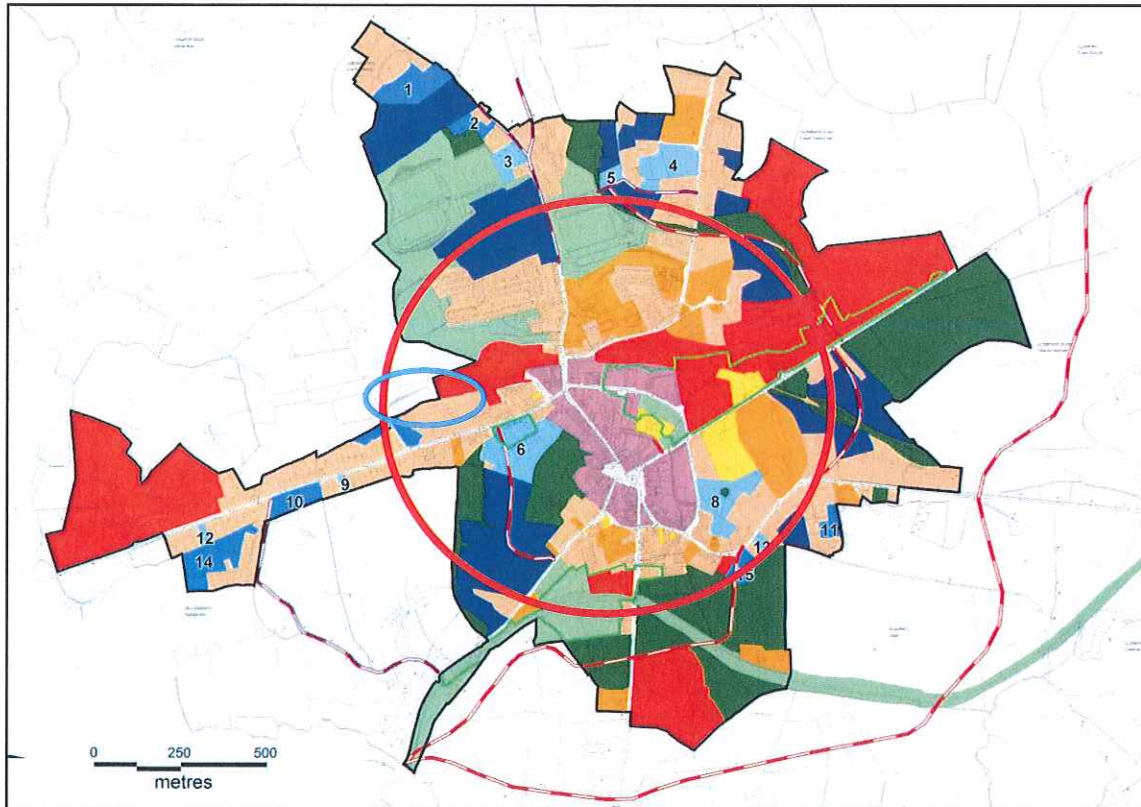


Figure 4 Settlement envelope and proposed zonings as detailed in the draft Clones town Development Plan 2019-2025. Context location plan included denoting a 1.2km radius from Clones town centre and subject lands which are located within the 1.2km radius from Clones town centre (source: draft Monaghan County Development Plan 2019-2025)

For due consideration we specifically highlight the following for reference:

- The subject lands are considerably closer to Clones town centre than alternative parcels of lands which are included within the proposed settlement envelope; the subject lands should therefore be included within the settlement envelope as proposed for Clones town.
- Parcels of lands are located further along Newtownbutler Road which are proposed residential; exclusion of our client's lands from being within the settlement envelope does not represent a sequential or an appropriate zoning designation.
- Parcels of lands are located outside the 'theoretical' 1.2km radius from Clones town centre and which have been included both within the settlement envelope and

denoted as 'proposed residential' lands; we submit this is not an appropriate sequential approach to zoning of lands as proposed.

- The subject lands are positioned immediately adjacent to 2no. parcels of lands which are proposed for zoning as 'residential B'. The same means of access onto the Newtownbutler road can be utilised to access our client's lands; the subject lands should therefore be regarded as 'serviceable'.

We submit our client's lands represent a logical sequential expansion of Clones town; inclusion of the subject lands both within the settlement envelope and zoned as 'proposed residential' will be consistent with the zoning approach required under CSP3 & CSP9 of the RPG's.

5.0 Summary & conclusions

This submission relates to the parcel of lands as identified at Carn, Clones town. In summary, this submission requests the following:

- (i) At a county level under the core strategy, the population allocation/HLR's should be consistent objective 3a of the NPF in the first instance; ie at least 40% of population growth/HLR's to be allocated to existing urban settlements. Given the pressure for single rural houses in the hinterland surrounding Clones the allocation of adequate lands for urban-based housing units should be a priority of the Clones town development plan and related zoning provisions.
- (ii) The growth rate for the county should be increased to a minimum of 1.6%; this results in a forecast target population to increase above calculations as forecast.
- (iii) Applying a growth rate of 1.6%, the forecast population increases within Clones town above calculations as forecast by an additional minimum of 106 persons (ie. 444 persons for the town rather than 338 persons as forecast).
- (iv) We submit a 162 housing unit requirement for Clones town equates to 9.78 ha of zoned lands for 'proposed residential' in Clones town. (based on an average density throughout residential lands of 16.5 units per ha). This is a minimum and fails to take account of any 'headroom', low density or serviced sites which should also be considered at plan preparation stage as first phase residential.
- (v) We submit the Housing Land Allocation of 7.95ha for 'proposed residential' is therefore too restrictive and fails to correlate with the 22.85% increase in lands zoned for Industry, enterprise & employment as provided for in Clones.
- (vi) Further, the incorporation of 'strategic residential reserve' should be omitted from the core strategy approach. A market for 'serviced sites' exists locally, and should be considered as an alternative to 'strategic residential reserve'. This will facilitate an alternative to rural housing and be more sustainable. It is also consistent with the objective set out under 2.1 of the draft plan wherein it states as an objective to "*Provide for low density development on residential units on*

suitable sites within the designated settlements in order to provide an alternative house type choice to rural one-off housing”.

In summary we request that the Planning Authority amend the settlement envelope for Clones town and include the subject lands of 1.05 ha to be zoned as ‘proposed residential’ within the settlement envelope.

We submit the zoning of our client’s lands as ‘proposed residential’ is consistent with objectives 3, 5, 7 and section 4.5 of the NPF and consistent with the sequential zoning approach required by the RPG’s.

We trust the Planning Authority will have regard to the contents of this submission in it’s preparation of the Monaghan County Development Plan 2019-2025.

Yours sincerely,



Ronan Woods
Director/MIPI