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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.

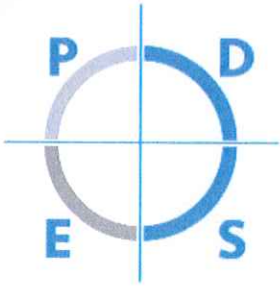
I would note that our Client was not made aware of any changes to the zoning of lands in their ownership and a result of the preparation of the draft Development Plan. Can all correspondence relating to this submission be forwarded to the above address.

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 CORNACASSA,
MONAGHAN**

Prepared by
PDES PLANNING CONSULTANTS

On behalf of
QUEST II FUND 900104

MAY 2018

1.0 Introduction

We have been instructed to make this submission on behalf of our client, Quest II Fund 900104, in respect of lands at Cornacassa, Monaghan 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 Monaghan County Council amend the proposed zoning of the subject lands of 3.4. ha from 'Strategic Residential Reserve to 'Proposed Residential'.

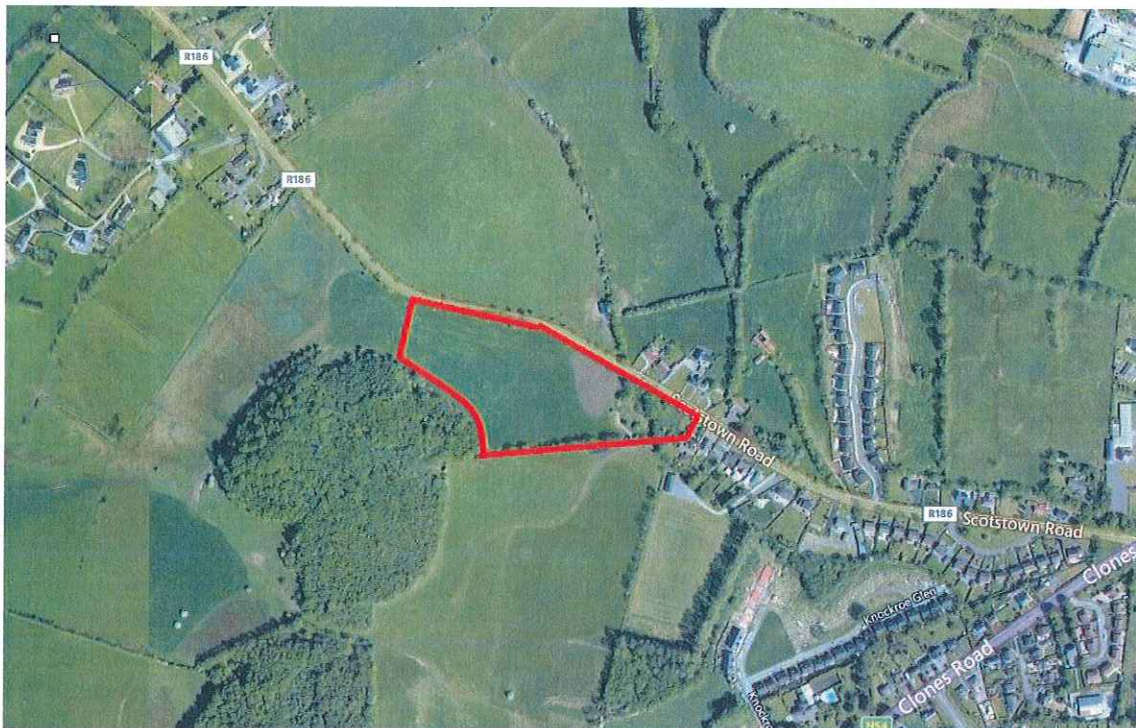


Figure 1: Subject lands for reference purposes

We highlight this submission to be read in conjunction with our separate submission regarding the folio of lands comprising 0.88ha at Cortolvin Td, adjacent to Tom Young's Wood, Clones Road.

2.0 Current planning context

The subject lands are noted zoned as 'strategic residential reserve' under the 2013-2019 Plan.

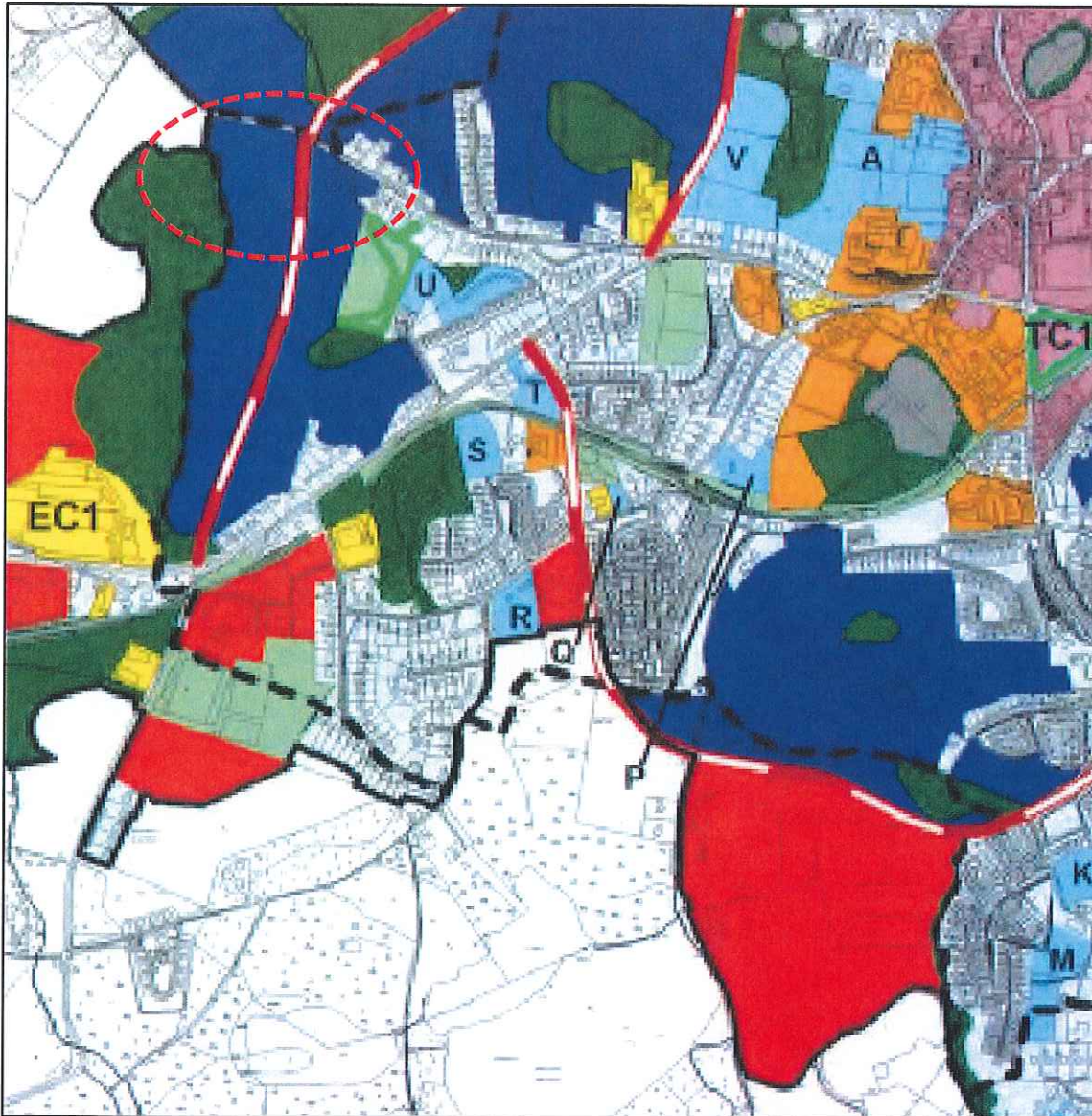


Figure 2 Zoning map as per Monaghan County Development Plan 2013-2019 showing the submission lands. The current zoning as relates to the lands is 'strategic residential reserve' (source: Monaghan County Development Plan 2013-2019)

We consider in the broadest this zoning as currently applies recognises the 'serviced status' of the existing lands with public footpath adjacent, existing foul sewer and ESB connections available.

On referencing the core strategy incorporated into the 2013-2019 County Development Plan, we note:

- 47.4 ha of lands were zoned as proposed residential in Monaghan Town.
- Population projections for Monaghan were forecast to fall by 6.5% between 1996 & 2021 (based on assumptions set out under table 3.9 of the 2013-2019 County Development Plan)

In planning terms, we consider the previous estimate in terms of 'population decrease' was based on a period of economic recession and associated net migration due to high levels of unemployment historically.

In this context, given the 'depressed population growth rates' we consider the 2013-2019 County Development Plan adopted the correct approach in ensuring adequate lands were zoned. The zoning as currently relates under the 2013-2019 Development Plan for the submission lands as 'strategic residential reserve' is therefore considered appropriate, as a minimum in terms of overall hectares for residential purposes as required for during a period of recession and depressed house-building volumes.

Also, given the low levels of housing constructed in urban areas throughout the county in the last ten years, it is noted that currently 37% of the county's population are based in designated urban settlements, which remains below the state average.

This unsustainable approach of excessive persons living in rural areas is recognised under the Regional Planning Guidelines wherein it states "*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*".

Whilst market fundamentals and the economic collapse over the last few years rendered housing development construction to be unviable, this is a scenario that now requires attention; both in land-use planning terms and in terms of actual units as now required and should be provided for through the development plan process in urban areas.

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 such as our clients which are already serviced.

3.0 Planning status

For reference by the Planning Authority, it is highlighted that permission has previously been granted for residential development on the subject lands, albeit since expired.

Specifically planning application references:

0851 & 0830003: Permission granted for 30no. detached dwellings (which overlapped between the Monaghan Town Council boundary)

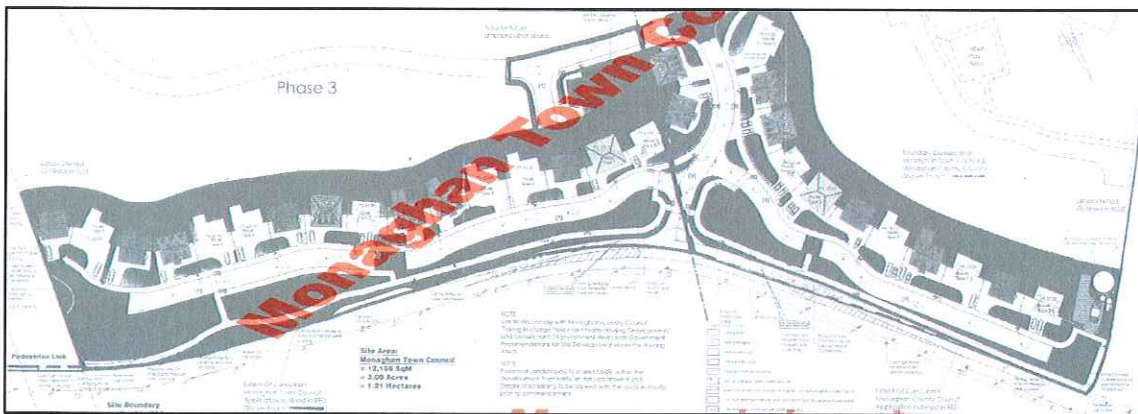


Figure 3 Extract from site layout associated with permissions 0851 & 0830003

4.0 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 Monaghan town centre, nearby schools and Monaghan leisure centre.

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 north-west along Scotstown road from the town centre boundaries and the nearby amenities aforementioned. It is to be regarded as an 'infill' parcel of lands.

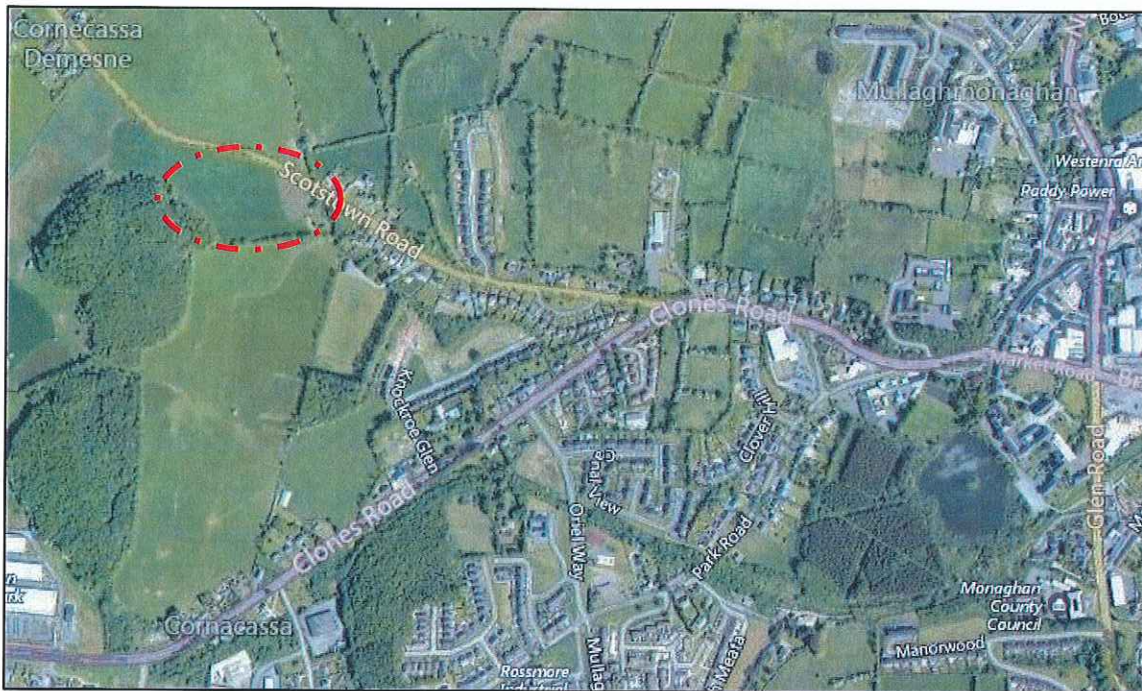


Figure 4 Location map showing the submission lands in the context of Monaghan Town (source: arcgis viewer)

We submit the subject lands are therefore to be regarded as 'serviced 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.

5.0 Other matters

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

- **47.4 ha for proposed residential**
- **150 ha for industry, enterprise & employment.**

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

- **44ha in total for proposed residential (which also incorporates phasing provisions under 'A', 'B' and 'Strategic Residential Reserve'; as per table 2.5 of the draft plan)**
- **224 ha for industry, enterprise & employment.**

In response, we submit:

- The increase in zoning for industry, enterprise & employment from 150ha under the 2013-2019 County Development Plan to 224 ha as now proposed under the draft 2019-2025 County Development Plan represents a 49.33% increase in lands for industry, enterprise & employment;
- This 49.33% 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 Monaghan, 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.

5.1 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".

Of note to our submission is section 4.5 of the NPF which states **“The NPF targets a significant proportion of future urban development on infill/brownfield development sites within the built footprint of existing urban areas. This is applicable to all scales of settlement, from the largest city to the smallest village”**.

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) Servicable 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.

5.2 Core Strategy

5.21 Overview

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 Border 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	3.8	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	0.0	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.

5.22 Core Strategy implications for Monaghan 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 9415 by 2025. (ie 1737 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 or 'residential B' as set out in the core strategy both due to:

- the conservative 1.04% assumed growth rate suggested provides for 1737 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 Monaghan town we submit:

- The population target of 70,813 results in a forecast population increase within Monaghan town to increase above calculations as forecast by an additional minimum of 498 persons (ie. 2235 persons increase in total rather than 1737 as forecast). This is based on an allocation of 14% of county population. (as per table 2.1 of the core strategy)
- A population target increase of 2235 persons for Monaghan town results in a requirement for at least 813 housing units; (ie. based on an assumed household size of 2.75 persons as stated by the CSO in 2017)

- This represents an additional 498 person increase which has not been factored into the core strategy HLR for Monaghan town.

In total, we submit a 813 housing unit requirement for Monaghan town equates to 49.27 ha of zoned lands for 'proposed residential' in Monaghan. (based on an average density throughout residential lands of 16.5 units per ha).

This results in a housing land requirement within Monaghan Town of at least 49.27 ha, rather than 44ha as proposed in the draft plan.

We also submit the HLR requirement of 49.27 fails to take account of any 'low density' or 'serviced site' zonings which may be below a density of 16.5 units per ha.

5.23 Housing Land Availability

Further, in terms of actual lands identified under the draft County Plan 2019-2015, we note the HLA allocation (44ha) for Monaghan is not reflective of what lands are actually available.

For due consideration we specifically highlight the following for reference:

- Site 15 as owned by our client is being requested to be zoned as 'Landscape Protection/Conservation'; (we refer to our submission under separate cover). Comprising 0.88ha, we consider 'Site 15' at Cortolvin has capacity to accommodate 14 dwellings. Alternative lands should be identified at plan preparation stage to 'compensate' for the revised zoning as sought by our client re 'site 15'.
- In this regard we note discussions have been held recently with Housing Section, Director of Services and Mr B Aughey regarding the submission lands at Cornacassa. Specific discussions are highlighted as there is a recognised need for serviced sites at suburban locations.
- In this context we submit that the submission lands discussed herein (3.44ha) can be utilised to facilitate an alternative location for 'proposed residential' lands instead of the land-holding at Cortolvin. (ie a zoning HLA re-allocation from Cortolvin to Cornacassa lands)

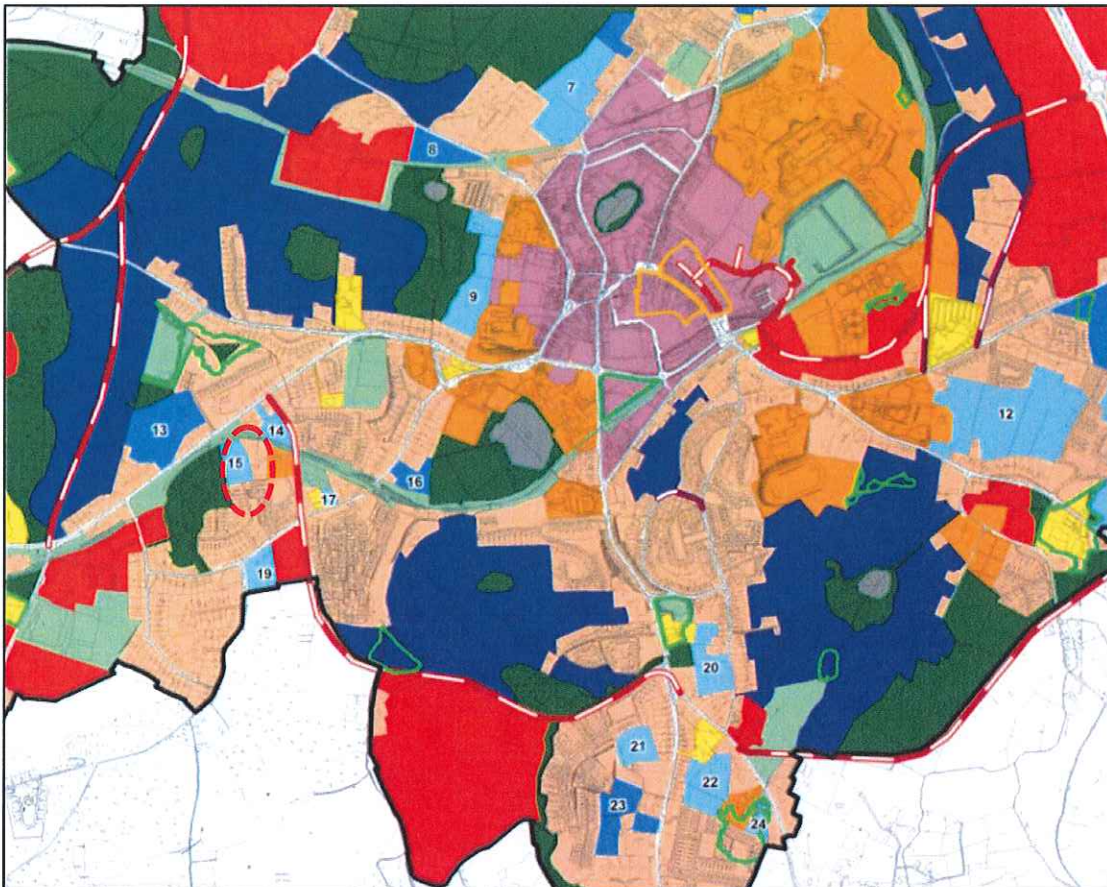


Figure 5 Zoning map as per draft Monaghan County Development Plan 2019-2025 showing site '15' as belonging to our client (source: draft Monaghan County Development Plan 2019-2025)

6.0 Summary & conclusions

This submission relates to the parcel of lands as identified at Cornacassa, Monaghan 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 to be allocated to existing urban settlements.
- (ii) 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'.
- (iii) The growth rate for the county should be increased to a minimum of 1.6%; this results in a forecast population increase within Monaghan to increase above calculations as forecast.
- (iv) Applying a growth rate of 1.6%, the population target of 70,813 results in a forecast population increase within Monaghan town to increase above calculations as forecast by an additional minimum of 498 persons (ie. 2235 persons for the town rather than 1737 persons as forecast).
- (v) We submit a 813 housing unit requirement for Monaghan town equates to 49.27 ha of zoned lands for 'proposed residential' in Monaghan. (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 low density 'key site requirements' which may be specified regarding 'serviced sites'.
- (vi) We submit the Housing Land Requirement of 44ha is too restrictive and fails to correlate with the 49.33% increase in lands zoned for Industry, enterprise & employment as provided for in Monaghan.
- (vii) 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 re-zone the subject lands of 3.4 ha from 'strategic residential reserve' to 'proposed residential'. If considered appropriate a key site requirement could be specified that the development is either low density or 'serviced sites'.

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 National Planning Framework.

In conclusion, there should be a provision of 'head-room' to allow for market choice; ie particularly given the fact that 'land hoarding' takes place in such urban locations.

Given the acute housing shortage that is now apparent both within the county and further afield, zoned lands should be the priority for housing allocations going forward; this is an urgent requirement.

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