

Treanor, Bronagh

From: Garrett Mackin [gmackin@wardconsult.com]
Sent: 25 May 2018 14:41
To: ldevplan
Cc: Stephen Ward; Bronagh Clarke
Subject: RE: Submission - Draft Monaghan County Development Plan 2019-2025 - Mr. M. Conroy
Attachments: Submission - Draft MCDP 2019-2025 - Mr. M. Conroy (Final Issue).pdf

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Dear Sir/Madam,

Please find attached, a submission in relation to the Draft Monaghan Development Plan 2019-2025 on behalf of Mr. Martin Conroy, Unit 3, Duleek Industrial Estate, Duleek, County Meath.

I would be grateful if you could confirm receipt of this email.

Regards,

Garrett Mackin

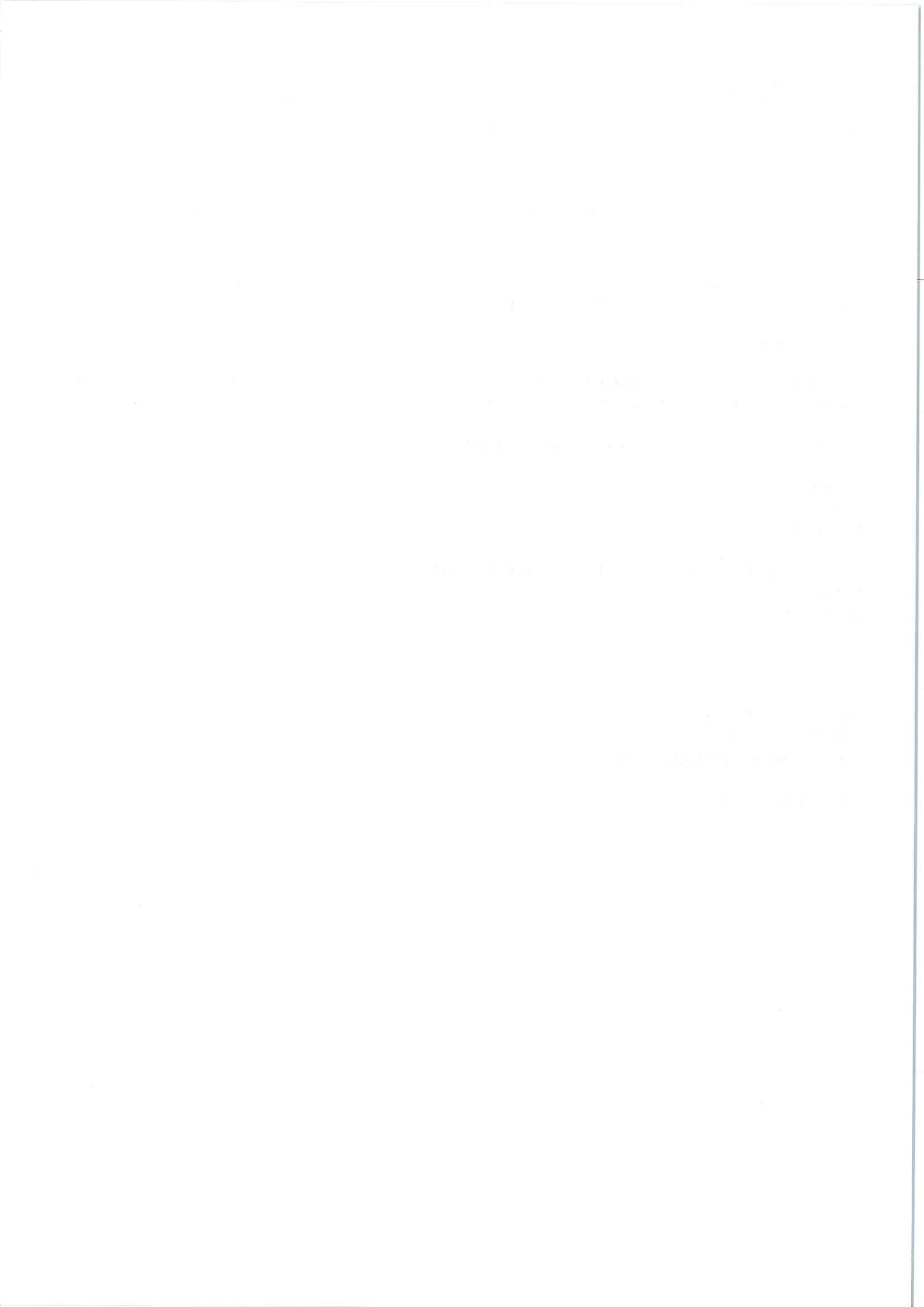
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Forward Planning Unit,
Planning Department,
Monaghan County Council,
The Glen,
Co. Monaghan

25th May 2018

Dear Sir or Madam,

RE: SUBMISSION ON BEHALF OF MR. MARTIN CONROY, UNIT 3, DULEEK INDUSTRIAL ESTATE, DULEEK, CO. MEATH TO THE DRAFT COUNTY MONAGHAN DEVELOPMENT PLAN 2019-2025 – LANDS AT MARKET HOUSE LANE, EMYVALE, CO. MONAGHAN

1.0 INTRODUCTION

Stephen Ward Town Planning and Development Consultants Limited, Jocelyn House, Jocelyn Street, Dundalk, Co. Louth have been engaged by Mr. Martin Conroy, Unit 3, Duleek Industrial Estate, Duleek, Co. Meath to make this submission on the Draft Monaghan County Development Plan 2019-2025.

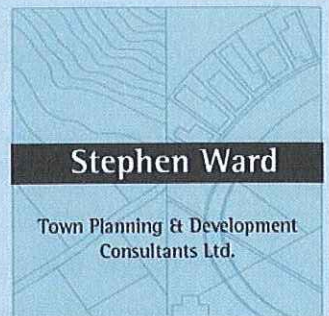
Please address all correspondence to Stephen Ward Town Planning and Development Consultants Limited, Jocelyn House, Jocelyn Street, Dundalk, Co. Louth.

2.0 PURPOSE OF SUBMISSION

The submission relates to lands located to the north of Market House Lane in Emyvale, Co. Monaghan. The lands are edged red on the map overleaf (Map 1).

This submission seeks the following:

- a) To include the submission lands within the Emyvale village development boundary.
- b) To designate the submission lands as an appropriate location for low-density residential use.
- c) To designate the submission lands as an appropriate location for a nursing home.
- d) Request changes/additions to Draft Monaghan County Development Plan 2019-2025 in respect of settlements appropriate for the location of nursing homes.



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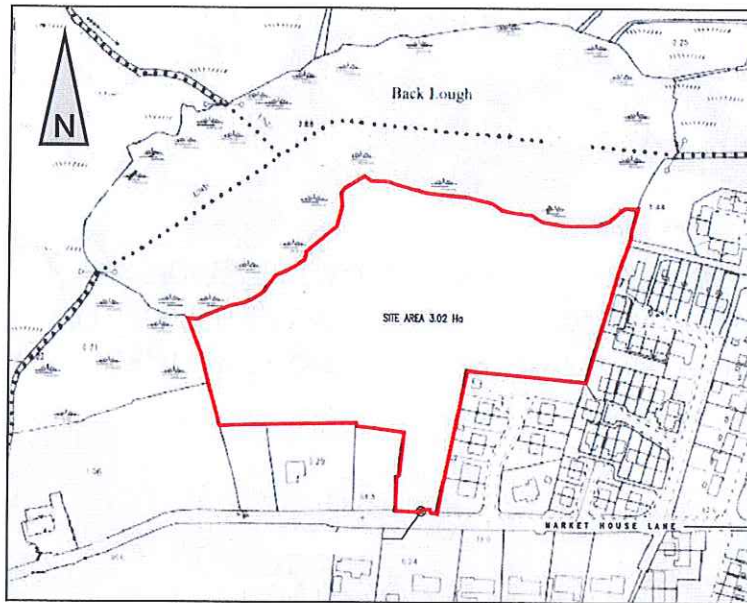


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3.0 SITE LOCATION AND DESCRIPTION

The submission site outlined on Map 1 is located to the north of Market House Lane and is contiguous to the existing built footprint of the village. The lands extend to an area of approximately 3.02 ha (7.46 acres). The surrounding area consists of low-density residential development to the south, suburban housing estates to the east and greenfield lands to the west. The site is bounded along its northern boundary by 'Back Lough'.

Map 1 – Site Location Map with Approximate Boundaries Outlined in Red



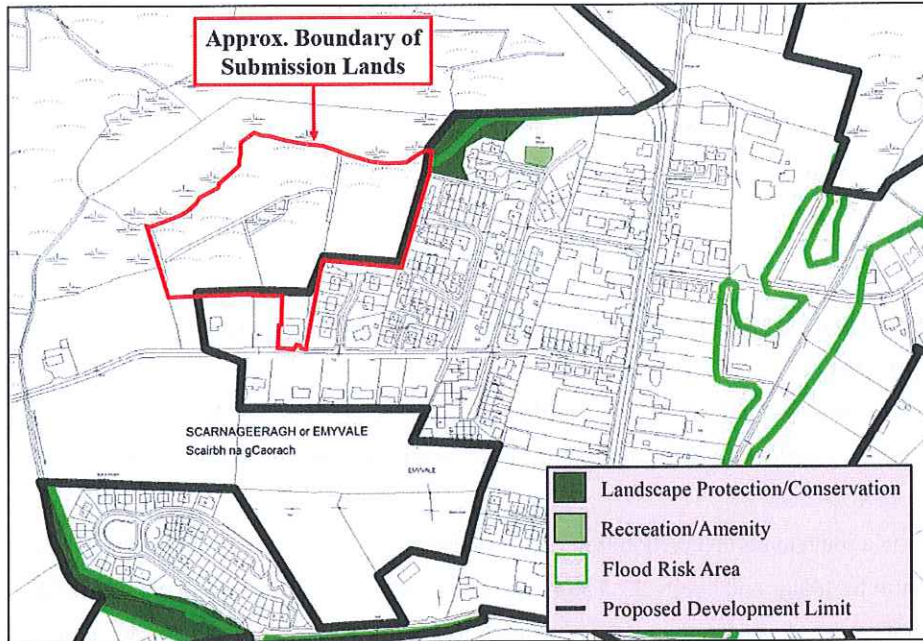
4.0 DRAFT MONAGHAN COUNTY DEVELOPMENT PLAN 2019-2025

Table 2.2 of the Draft Monaghan County Development Plan 2019-2025 identifies Emyvale as a 'Tier 4' village settlement. Under Objective SH04, the primary aim for Tier 4 village settlements is -

"To promote and facilitate development that is commensurate with the nature and extent of the existing villages and support their role as local service centres. Including the village network as part of the settlement hierarchy is an acknowledgement of their importance to the rural areas of County Monaghan in sustaining the vitality of rural communities. Each village has the necessary infrastructure capacity available to ensure they can continue their function as local growth settlements and serve the needs of their hinterlands. These villages provide services to rural communities, including housing, neighbourhood level retail and social facilities which are critical to the on-going viability of these rural communities." (Section 2.3.9, pg. 29 – Draft Monaghan County Development Plan 2019-2025).

Map 2 overleaf outlines the proposed development boundary for Emyvale Village with the submission site edged red. There is no defined zoning provision for Emyvale Village

Map 2 – Emyvale Development Boundary Map – Draft Monaghan County Development Plan 2019-2025



5.0 JUSTIFICATION FOR SUBMISSION

(a) To Include the Submission Lands Within the Emyvale Village Development Boundary

5.1 Planning History has Established the Suitability of the Site for Residential and Nursing Home Uses

The planning history attached to the site confirms its suitability for the development of residential and nursing home uses. Table 1 below identifies previous permissions for such uses granted by Monaghan County Council and An Bord Pleanala respectively.

Table 1 – Site Planning History

07/947	Permission for 63 no. residential units	Granted by MCC (Date: 07/03/2008).
09/627 (ABP Ref. No. PL.18.237936)	Permission for the construction of a 75 bedroomed single storey Nursing Home and 26 no. residential units	Granted by MCC (13/10/2010) & Modified by ABP (Date: 25/03/2011).

Both the Planning Authority and An Bord Pleanala found in favour of the proposed nursing home development granted under P.A. Ref. No. 09/627 (ABP Ref. No. PL.18.237936) with the Report of the Planning Officer stating,

“There is no defined zoning provision for the application site however, having regard to the surrounding uses, the overall settlement aims of the development plan the principle of the proposed development is welcomed in this area.”

Planning permission 09/627 only expired in 2016. A ‘time extension’ application was not sought due to circumstances outside the control of the land owner at that time. It is submitted there have been no material

changes in the policy base affecting the lands since the grant of planning permission by An Bord Pleanála in 2011. As such it is submitted there is strong justification for including the site within the development boundary of the settlement.

Taking into account the site's planning history and having regard to its location contiguous to the existing built-up area, it is submitted its inclusion within the settlement boundary for Emyvale would reinforce and consolidate the settlement and make effective use of serviceable and well connected lands.

5.2 Submission Lands are Unsuitable for Productive Agricultural Use and have the Potential to become Urban Fringe Lands

The location of the submission lands to the rear of existing development and with an access difficult for use by agricultural machinery makes the site difficult and uneconomic to use for agricultural purposes.

The site slopes in a south to north direction from the roadway at Market House Lane towards Back Lough making it difficult to farm for tillage and livestock. The submission lands are not large enough to form a viable farm unit. Given the location of the lands relative to the settlement boundaries it is submitted they may, if not allocated for development, become urban fringe lands with all the difficulties associated with such lands. The lands are largely to the rear of an existing housing development and passive supervision is not possible.

The submission lands represent a sensible 'rounding-off' of Emyvale Village. The site is bound to the south and east by existing residential development. Back Lough acts as a natural barrier for the expansion of Emyvale, as it constrains any development taking place in the rural countryside. The rear of the existing houses face Back Lough and would not impact on the viewfield of the existing houses in the vicinity of the site. Allowing the development of the submission lands will allow the village to expand in accordance with the recommendations of the Project Ireland 2040 National Planning Framework (NPF). The NPF states;

"The target is for at least 40% of all new housing to be delivered within the existing built-up areas of cities, towns and villages on infill and/or brownfield sites. The rest of our homes will continue to be delivered at the edge of settlements and in rural areas." (Section 1.2. – pg. 11 - Project Ireland 2040 National Planning Framework)

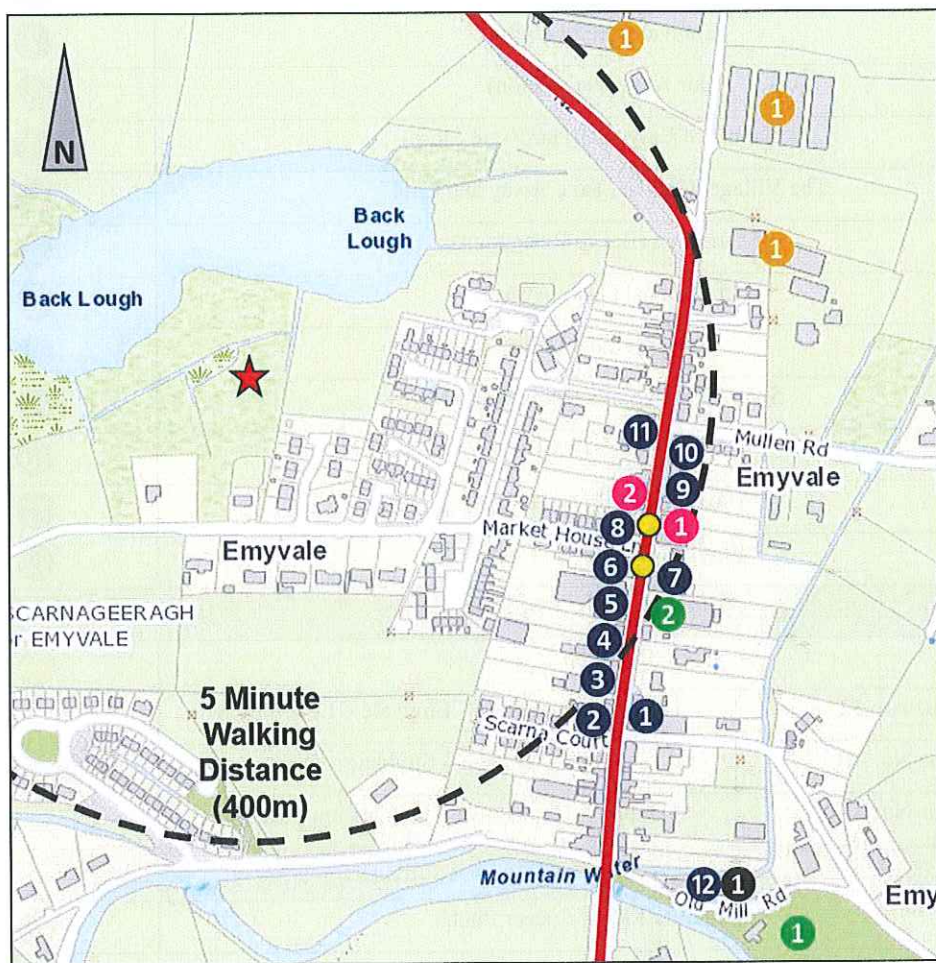
The site serves no purpose and cannot be used for future productive agricultural use. The inclusion of the submission lands within the village development boundary would achieve a more sustainable form of development, in keeping with the provisions of the National Planning Framework where the objective is to concentrate development within existing built-up areas and at the edge of existing villages.

5.3 Social Infrastructure Audit & Compliance with Sustainable Residential Guidelines in Urban Areas (2010)

In keeping with the Section 4 of the Sustainable Residential Development in Urban Areas Guidelines, the submission lands would facilitate a sustainable and sequential extension to the village by virtue of their proximity and accessibility to a wide range of social/community infrastructure and services. As illustrated on Map 3 below the submission lands are within 400 m the equivalent of 5 minutes walking distance from the majority of these facilities.






















5.3.1 Social Infrastructure Audit Result – Emyvale

Map 3 – Social Infrastructure Map of Emyvale



(Refer to Map Index Table overleaf identifies the nature of these facilities and services.)

Table 2 – Social Infrastructure Audit – Map Index

Map Index	
Submission Lands	
400m (5 Minutes Walking Zone)	■■■■■■■■■■
Health Services	
McSorley's Pharmacy	
Emyvale Health Centre	
Shops & Services	
Centra Supermarket / Great Gas Petrol Station	
Emyvale Credit Union	
Hair Alert (Hair Salon)	
Holland's of Emyvale (Hardware Store)	
The Village Kitchen (Take Away and Café)	
Scarna Inn (Bar & Restaurant)	
Taj Mahal (Take Away)	
Emyvale Post Office	
Spar – McMahon's (Supermarket)	
An Teach (B&B)	
Maxol (Oil & Petrol Depot)	
Emyvale Enterprise Centre	
Bus Routes	
Bus Stop	
Bus No: 32	Dublin – Monaghan – Emyvale – Letterkenny
Bus No: X3	Dublin – Omagh – Strabane – Derry
Bus No: X4	Dublin – Cookstown – Dungannon – Derry
	
Sports & Leisure Facilities	
Community Field / Soccer Pitch	
Emyvale Leisure Centre	
Major Employment Centre	
Silverhill Foods	
Childcare Facilities	
Riverbank Community Childcare Services Ltd. (Within Enterprise Buildings)	

Sustainable Transport – Emyvale is strategically located on the N2 National Road which is the primary road connection between Dublin and Derry. This route allows access to a high-quality road network and high-frequency bus services. The No. 32, X3 and X4 bus provides Emyvale with direct connections to Monaghan Town including Derry and Dublin. The next phase of the N2 upgrade from Corracrin to Emyvale is due to commence shortly and will add to the quality of the road network and efficiency of the bus services in Emyvale. *The main bus stop for Emyvale is located less than c. 400 metres from the submission site.*

The location of the site within close proximity to high-quality road and transport connections adds to the suitability of the submission site's for development. Furthermore, it's location within walking distance of villages services will facilitate sustainable modes of transport with existing pedestrian connections already available from Market House Lane to the Main Street.

Proximity to Existing Social and Community Infrastructure - The Social Infrastructure Audit clearly illustrates that Emyvale village contains a wide range of shops and services capable of serving and supporting residential and nursing home type uses. These shops and services include:

Doctors Surgery/Medical Centre, Pharmacy, Two Grocery Stores one of which is a petrol service station, Hardware Shop, Hair Dressers, Leisure Centre, Café, Two Take-Aways, Credit Union and playing field. In addition to the Social Infrastructure Audit Map above, there are also a number of pubs located on the Main Street. These are not illustrated in Map 3 above.

Proximity to Employment - Not only are the submission lands located close to shops and other social and community infrastructure but they are also located to within walking distance of the Silverhill Plant, a significant employer in the area. The Silverhill plant currently employs c. 200 jobs¹ and is located just c. 400 m from the submission lands.

In addition to the Silverhill plant, there are other major employers close by. These include, Connolly Furniture, Universal Graphics, Gola Furniture and Cornacrieve Mushrooms, Mc Aree Engineering in Carrickroe and Castle Leslie in Glaslough.

5.4 Submission Lands are Least Environmentally Constrained Site

Not only is the site contiguous to the built-up area of the village, it is also the 'least environmentally constrained' site within the village environs capable of accommodating development. This is the case for the following summarised reasons –

¹ Silverhill Farms – Website – Our Story (<http://www.silverhillfarm.ie/our-story>) (Accessed – 18/05/2018)

Natura 2000 Designations - *The submission lands are not located within, or in proximity to any Natura 2000 sites.*

The Draft Monaghan Development Plan 2019-2015 identifies Emy Lough some 1.3 km to the east of the village as a Proposed National Heritage Area (pNHA). It is submitted the location of Emy lough acts as a development constraint to an eastern extension of the settlement.

Map 4 – Shows Location of Submission Lands Remote from Emy Lough



Protected Structures/Recorded Monuments - *There are no Protected Structures within or in proximity to the submission lands.* The nearest Protected Structure and archaeological sites are located approximately c. 350 metres and c. 400 metres south-east of the submission lands, respectively, with intervening lands comprising the built-up area.

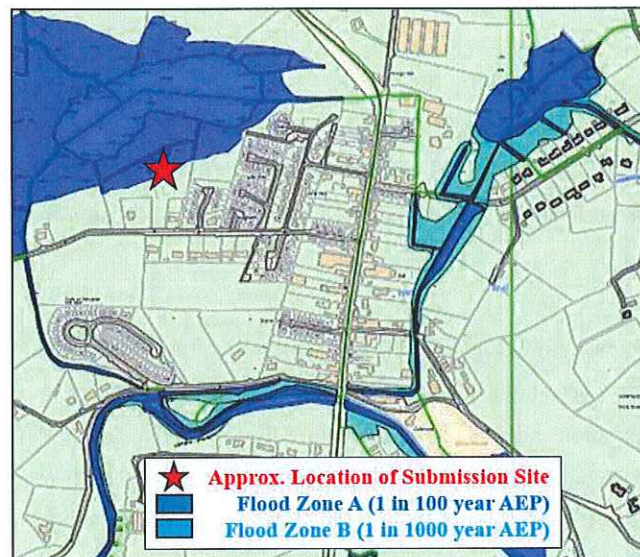
Map 5 overleaf illustrates the location of the nearest Protected Structure and Recorded Monument to the submission lands.

Map 5– Map of NMS/NIAH Sites in the Vicinity of the Submission Lands



Flood Risk -The Strategic Flood Risk Assessment prepared for the Draft Monaghan County Development Plan 2019-2025 (Appendix 3) identifies the northern section of the lands being susceptible to flooding.

Map 6 – Emyvale Flood Map (Map No. 6 - Strategic Flood Risk Assessment – Draft Monaghan County Development Plan 2019-2025 (Appendix 3))



The southern section of the submission lands occupy an elevated position and are located outside of the flood zone. Any development will be restricted to the south of this flood line and appropriate mitigation measures can be put in place. The extent of development on the lands can be determined at development management stage.

The inclusion of the submission lands within the village development boundary only establishes that the site is within the settlement but the type and extent of development on the lands will still be subject to other plan policies and development management requirements at development management stage.

Site is Not Location within a Sensitive Ground Water Area - By reference to Map 8.2 of the Draft Monaghan County Development Plan 2019-2025, *the submission site is not situated in a sensitive ground waters area.*

No Protected Views/Scenic Routes Affecting the Site - According to Map 6.1 of the Draft Monaghan Development Plan 2019-2025, *the submission site is not located in an area that is subject to the protection of scenic views and routes.*

6.0 – (b) To Designate The Submission Land as an Appropriate Location for Low-Density Residential Use

In addition to the foregoing reasons for including the site within the settlement boundary for Emyvale, reasons for designating the submission lands as an appropriate location for low-density residential use are set out in the following section.

6.1 Development of the Submission Site for Low Density Residential Development would Ensure the Development of Emyvale takes in sequential and coordinated manner.

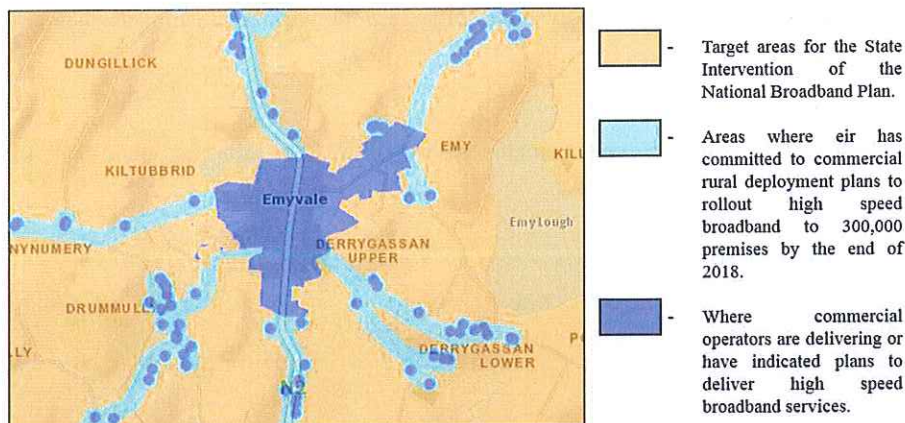
Having regard to the site’s location adjacent to the existing built-up area, within walking distance of shops and services it is submitted that its development for low density residential development would represent a natural extension to settlement.

Sustainable Transport - The site is within walking distance of the Main Street and to a major employment facility. It is also accessible to a number of high-frequency bus routes and other employment areas. The development of the submission lands for residential would reduce dependence on the private car and promote sustainable modes of transport.

Broadband Provision – Increasingly the availability of high quality broadband is a determining factor in where people choose to live. Areas where high quality broadband is available increases opportunities for enterprise, employment, education, innovation and skills development for those who live and work in the area. The National Planning Framework (NPF) in conjunction with the National Broadband Plan (NBP) aims to facilitate the delivery of increased broadband services across rural Ireland. *Emyvale is one of the designated rural areas under the NBP.* The NPF states the following;

National Policy Objective 24 – “Support and facilitate delivery of the National Broadband Plan as a means of developing further opportunities for enterprise, employment, education, innovation and skills development for those who live and work in rural areas.”

Map 7 – Department of Communications, Climate Action & Environment – High-Speed Broadband Map



Map 7 above illustrates that access to high speed broadband services can be achieved to the submission site as Emyvale avails of existing high speed broadband services (shown in blue).

Population Projections for Emyvale – Table 2.3 of the Draft Monaghan County Development Plan 2019-2025 sets out the population projections for Emyvale over the lifetime of the Draft Plan i.e. up to 2025. The projected population increase allocated for Emyvale c. 119 persons. The projected increase in population for Emyvale is the highest amongst the Tier 4 settlements. Designating the submission site for low-density residential development will ensure population expansion occurs in line with the projections of the Draft Monaghan County Development Plan 2019-2025.

Development of the Site for Low Density Development would Offer an Alternative to One Off Housing - It is also submitted that allowing the site to be designated for low-density residential use will discourage urban demand for housing in the rural countryside offering an alternative to one-off housing in the countryside. In this regard the low density development of the lands would be consistent with Section 6.3 (d) of the Sustainable Residential Density Guidelines.

New Housing For Larger Firms / Multi-Nationals – The development of the submission lands for low-density residential uses would assist in meeting housing demand generated by large firms with an international reach in Co. Monaghan. Such firms include Silver Hill Farms (within walking distance of the site), Combilift, Entekra and McAree Engineering Ltd. (all within 10 minute drive).

With regard to employment and investment, a key aim of the Draft Development Plan is –

“To ensure a high quality environment and standard of design is provided and maintained in relation to new and existing industrial development, in order to attract inward investment thus increasing employment opportunities, while at the same time enhancing the attractiveness of the area for the labour force to locate and remain within the County”. (Section 4.5 – Industry – pg. 66 - Draft Monaghan County Development Plan 2019-2025)

The availability of suitable housing to accommodate employees is a crucial consideration for multi-nationals. There needs to be an effort to understand the dynamics of large employers / multinationals, their employees and the accompanying lifestyle they expect.

Table 3 below illustrates the new employment announced in 2018 by large Firms and multi-nationals located in North County Monaghan.

Table 3 – New Job Announcements for North County Monaghan in 2018

Employer	New Jobs / Total Jobs	Location
Combilift ²	220 new jobs (550 jobs in total)	Monaghan Town
Entekra ³	100 new jobs	Monaghan Town
McAree Engineering Ltd ⁴	30 new jobs	Ballinode, Co. Monaghan
Gyproc ⁵	14 new jobs (44 new jobs during the development period)	Knocknacran, Co. Monaghan

Large firms employ many executives to oversee the running of businesses, and these executives are used to a high standard of housing and lifestyle. *As the above policy promotes the attracting of inward investment, then it should also be important to provide the type of housing required for those investors and their employees that come to reside near their workplace.*

An appropriate balance needs to be struck between meeting the housing requirements and expectations of the large firm / multinational executives, in the interest of sustaining local economies and communities and respecting local built form and character. If the type of housing does not meet expectations within the local area, they will then look elsewhere. The nearest and most attractive option could likely be the Greater Dublin Area, where the availability of the type of homes required is higher. This leads to extended commute times and economic leakage from the County of Monaghan.

An ERSI report by Edgar L.W. Morgenroth ⁶, highlighted that commuting in Ireland, is influenced by two main variables. These two factors are the labour market and the housing market. People are willing to commute longer distances for their preferential home. The ideal situation is to improve the housing market in the nearby locale of the corporation. If there is a demand for larger detached homes then they should be provided to prevent leakage of expenditure from the county. The proposal to have residential zoned land in Emyvale capable of providing high-end housing reduces the need for executives to look elsewhere such as the Greater Dublin Area. It is also beneficial to the community of Emyvale as commuting causes the community to lose out *“since less leisure time means that people are less likely to get involved in community activities and are less likely to interact with their neighbours”*. (Mongenroth, ESRI)

² Irish Independent - Combilift to create 200 jobs at its new €50m global HQ in Ireland – Dated: 26/04/18 – Accessed: 21/05/18
- (<https://www.independent.ie/business/jobs/combilift-to-create-200-jobs-at-its-new-50m-global-hq-in-ireland-36846333.html>)

³ The Irish Times - Monaghan-based Entekra to create 100 jobs following €46m investment – Dated: 08/05/18 – Accessed: 21/05/18
- (<https://www.irishtimes.com/business/construction/monaghan-based-entekra-to-create-100-jobs-following-46m-investment-1.3487081>)

⁴ AgriLand - Silo swell: Monaghan firm announces job creation with €5 million expansion – Dated: 12/04/18 – Accessed: 21/05/18
- (<https://www.agriland.ie/farming-news/silo-swell-monaghan-firm-announces-job-creation-with-e5-million-expansion/>)

⁵ Meath Chronicle - Gyproc invests €8 million in Monaghan quarry – Dated: 12/02/18 – Accessed: 21/05/18
- (<http://www.meathchronicle.ie/news/roundup/articles/2018/02/12/4152079-gyproc-invests-8-million-in-monaghan-quarry/>)

⁶ <http://www.esri.ie/pdf/COMMUTING.PDF>

Providing homes that are considered to be of a more upscale commodity in Emyvale will allow for less commuting times, better quality of life, immersion into the community, and an overall sense of betterment for the village. It means that those who invest in these homes are investing in the village of Emyvale and are more likely to be involved in the local community.

New Low-Density Residential Development Would Support Provision of Services Within Emyvale - It is submitted that designating the submission site for low-density residential housing will support the provision existing services within Emyvale and the surrounding areas. The Social Infrastructure Audit in Section 5.3 above concluded the range of services in Emyvale is of an excellent standard. These services are within walking distance of the submission site. Local level health services are available on the Main Street with a medical centre and doctor’s surgery being provided in order to meet the required needs of the local residents.

There are a number of primary schools in the vicinity of Emyvale village. Map 8 and Table 4 below illustrate the approximate location of the schools and the numbers of pupils for the 2017/2018 calendar year.

Map 8 – Map of Schools in the Vicinity of Emyvale Village

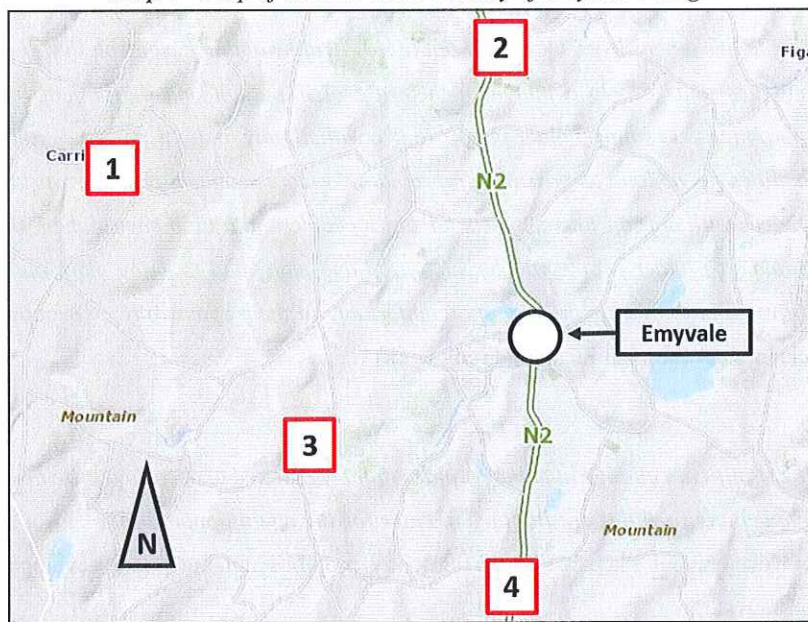


Table 4 – Find a School – Department of Education & Skills (2017/2018 – Provisional Primary School Results)

Map No.	School Name	Total Pupils		
1	Deravoy National School	31 (Girls)	35 (Boys)	66 (Total)
2	Knockconnon National School	48 (Girls)	53 (Boys)	101 (Total)
3	Edenmore National School	82 (Girls)	74 (Boys)	156 (Total)
4	Corr A Chrainn National School	104 (Girls)	128 (Boys)	232 (Total)

It submitted that the additional school going population generated by the development of low-density dwellings on the site would be capable of being absorbed by existing primary schools.

7.0 - (c) To Designate the Submission Land as an Appropriate Location for a Nursing Home

Life expectancy has risen over the past decades and is expected to rise sharply in the coming years. In addition, ESRI projections estimate that by 2040, 23 per cent of the population will be aged 65 years and over in 2041, compared with just 13.6 per cent in 2016⁷. The changing demographics brings with it considerations in terms of service planning that will be required and this is reflected in a wide range of current Government guidance, including the recently published National Planning Framework.

The National Planning Framework (NPF) states that over the next 20 years, Ireland will experience a dramatic increase in the population of people aged 65 and over.

“ESRI projections indicate that the numbers of people aged over 65 will more than double to 1.3 million people by 2040, making up approximately 23% of the population. This compares to 13.5% in 2016. In addition, it is expected that the population aged over 85 will quadruple. As people get older they are likely to have increasingly complex healthcare needs, with a requirement for services and facilities to support the provision of suitable and necessary care.

As more people live longer lives, they will want to stay healthy and independent, live in their own homes and communities and keep to a minimum their use of in-patient and out-patient hospital services. Government policy is to support older people to live with dignity and independence in their own homes and communities for as long as possible. In providing a more seamless and appropriate continuum of housing choices with appropriate supports for older people and a built environment that is attractive, accessible and safe, older people will be supported and motivated to enjoy more active, healthy and connected lives and to age confidently and comfortably in their community.” (Section 6.4 – pg. 86 – Project Ireland 2040 National Planning Framework)

Having regard to the significant change in demographics that is predicted to occur over the next decades, there is a need to ensure adequate facilities are in place to cater for the ageing population. As it stands, the Draft Monaghan County Development Plan 2019-2025 currently prohibits nursing home developments in Tier 4 settlements such as Emyvale.

Following on from the provisions of the National Planning Framework, Age Action Ireland provides guidance on the preferred location of housing for elderly persons;

“Ensure that service providers in the city or county cluster their most important services in accessible locations which are convenient for older people to get to.” (Improved Planning and Service Provision -

⁷ Section 6.4 – Age Friendly Communities – Older People (pg. 86) – Project Ireland 2040 – Building Ireland’s Future – National Planning Framework

A Guide to Sharing Ambitions and Opportunities What Age Friendly Cities & Counties can Achieve – Age Friendly Cities and Counties Programme – Age Friendly Ireland)

“Bring about better access to buildings housing health services, such as GPs’ surgeries and primary care clinics, and to those which provide essential services, such as post offices.” (Accessibility and Mobility - A Guide to Sharing Ambitions and Opportunities What Age Friendly Cities & Counties can Achieve – Age Friendly Cities and Counties Programme – Age Friendly Ireland)

Emyvale stands out above all other Tier 4 settlements as being appropriate for a nursing home. As illustrated in Section 5.3 above, the Social Infrastructure Audit identifies the provision of services and facilities in the Emyvale vicinity as being of an excellent standard, including medical services that would complement and support the function of a nursing home. In addition to the availability of these services, Monaghan General Hospital is located c.10 km to the south of the village, with the two settlements connected via the N2 National Route.

Planning precedent has also established that a nursing home would be suitable and appropriate for the site.

We cite Truagh Special Needs at Knockconan, Emyvale as an example of a successful rural health-care related development and it demonstrates the importance of having such facilities within the communities where they are needed.

There is a long standing history of significant rural settlement and industry in this area of north Monaghan which includes Emyvale, Carrickroe and Glaslough. There is a thriving community sector in the area. However, it is missing a nursing home to allow elderly persons reside within the community where they grew up and where their family now reside and to enable them to remain part of the community. Without a nursing home here, elderly persons would be forced to look at homes significant distances away, leading to increased isolation amongst the elderly population.

The availability of nursing home bed spaces at national level is being linked to the ongoing crisis in the health system, particularly hospital overcrowding and bed capacity. According to the Fianna Fáil TD for Cavan-Monaghan Niamh Smyth, she states the following;

*“There is no sense of joined up thinking in this Government; no acceptance that primary and community care services could ease the pressure on acute hospitals. Right across this country, there hundreds of older people in hospital beds, who would be better served in a step down facility. Many of them would prefer to be in a residential setting, but the beds are not available.”*⁸

*“We need to use all of the available options open to us – and that includes private nursing homes.”*⁸

There is an identified need for an increase in long-term and intermediate care places in nursing homes of between 40% and 54%, up from 29,000 in 2015 (Projections of Demand for Healthcare in Ireland, 2015-2030, ESRI).

⁸ Niamh Smith (Fianna Fáil TD) (Niamhsmyth.ie) - Urgent action needed on nursing home beds – Date: 10/02/17 – Accessed: 21/05/18 (<http://niamhsmyth.ie/2017/02/10/urgent-action-needed-nursing-home-beds-smyth/>)

There may not be sufficient bed capacity in alternative nursing homes in County Monaghan. It is submitted that a nursing home in Emyvale is a critical and much needed facility that would help alleviate a growing crisis in the health system.

The delivery of a nursing home in Emyvale would provide an important and much needed piece of social infrastructure consistent with National Planning Framework objectives. There is currently no nursing home facility in the North Monaghan and Emyvale area and the development of such a facility would allow elderly persons to reside within the community where they grew up and to enable them to remain part of the community.

The nursing home will provide additional long-term and intermediate care spaces, an area where demand is expected to increase significantly by 2030.

A nursing home for Emyvale will also ease capacity constraints at other nursing homes in County Monaghan.

8.0 - (d) Request Changes/Additions to Draft Monaghan County Development Plan 2019-2025

As stated in Section 7.0 above, there is a need for nursing homes in Tier 4 settlements. The provisions of the Draft Monaghan County Development Plan 2019-2025 restrict nursing home developments despite Emyvale having an excellent provision of complementary medical services and facilities. It is for this reason that our client seeks to amend the Draft Development Plan in order to facilitate nursing home developments for Tier 4 settlements.

The requested changes/additions to Draft Monaghan County Development Plan 2019-2025 wording are shown in Red text below;

Section 3.2.5 Older People

The aging of the population poses significant challenges for society in general particularly for the development of responsive health and social policies. As a key social policy area, housing is a function that must adapt in order to meet the needs of a growing number of older people. The Council will work with relevant agencies and the private sector to facilitate suitable proposals for the accommodation of older people.

The demand for nursing homes and comparable services is anticipated to grow and it is considered that such services should be located **within or immediately adjacent to** Tier 1, 2 and 3 settlements where public utilities are available and where opportunities for greater social inclusion and integration into the community are available.

Certain Tier 4 settlements may also have potential to accommodate such services within or immediately adjacent to the designated settlement. There will be a presumption against such services being permitted in the open countryside unless in exceptional circumstances whereby the re-use of an existing building is being considered with potential for strong accessibility to shops, places of worship, medical services and social inclusion exists.

Policy HSP12: To support independent living for older people and the provision of specific, purpose built accommodation and to require that nursing homes/analogous services are located within the Tier 1, 2 and 3 settlements, **and tier 4 settlements where appropriate supporting infrastructure exists**, except in exceptional circumstances where the suitable reuse of existing buildings can be considered.

Section 15.13.6 Nursing Homes/Residential & Retirement Homes

The demand for nursing homes and analogous services has grown as life expectancy has increased. In assessing planning applications for nursing homes or similar services the planning authority will refer to the following for guidance:

- The zoning objective for the area and/or the site's size, location and compatibility with other uses in the area.
- Access is provided for in a safe and adequate manner for pedestrians and vehicles including adequate parking provision in accordance with the standards set out in Chapter 15 of the Monaghan County Development Plan 2019-2025.
- The design and layout should respect the characteristics of the site and fit in comfortably within the landscape and with adjoining properties.
- Sufficient amenity space and landscaped areas should be provided to meet the needs of the residents and provide an attractive setting.

In the interests of sustainability, there will be a presumption against permitting nursing home/residential retirement homes in the rural area but also for reasons relating to poor accessibility, social exclusion and visual intrusion. The Planning Authority considers that these services should be located within **or immediately adjacent** the designated settlements and villages where public utilities are available and opportunities for greater social integration and inclusion to the community exist.

Policy RDP21: To generally require nursing homes/analogous services to be located within or immediately adjacent to the designated Tier 1-3 settlements of County Monaghan, **and within or immediately adjacent Tier 4 settlements where appropriate supporting infrastructure exists.**

The recommended changes/amendments to the Draft Development Plan aim to reverse the restrictions for nursing home developments in Tier 4 settlements, specifically Emyvale where there is an excellent provision of medical services and where transport links and services and infrastructure are all readily available. The recommended changes/amendments to the Draft Plan are consistent with the objectives of the National Planning Framework (NPF).

9.0 CONCLUSION

The submission requesting the inclusion of the identified lands within the village development boundary, designating the site for a low-density residential and nursing home development and recommending changes/amendments to the Draft Monaghan County Development Plan 2019-2025 is summarised in the following section.

(a) - To Include The Submission Land Within The Emyvale Village Development Boundary:

- It has been established by planning precedent that the submission lands are an appropriate location for residential development and a nursing home.
- The lands have no meaningful purpose or function and cannot be used for future agricultural use. Left outside of the settlement boundary they are in danger of becoming urban fringe lands.
- The submission lands are not affected by any landscape, ecological, architectural or archaeological designations and as such represent the least environmentally constrained site abutting the existing built-up area that is capable of accommodating the additional growth projected for Emyvale over the lifetime of the Plan.
- Whilst the northern section of the submission site is located within land that is susceptible to flooding. Development will be restricted to the south of this flood line. The inclusion of the submission lands within the village development boundary only establishes that the site is within the settlement but the type and extent of development on the lands will still be subject to other plan policies and development management requirements at development management stage.
- There is an excellent provision of services and facilities available within Emyvale. Including the submission lands within the village development boundary and developing them for low-density residential and nursing home uses will ensure the viability of these services and facilities continues into the future.

(b) To Designate The Submission Lands As An Appropriate Location For Low-Density Residential Use.

- The site is bound to the south and east by existing residential development. The rear of the existing houses face Back Lough and would not impact on the viewfield of the existing houses in the vicinity of the site. No current or future use for agricultural purposes.
- Designating the submission site for low-density residential development will facilitate the sequential development of the village. Connections to site services and infrastructural connections, such as broadband are all easily achieved.

- The submission lands have the potential to accommodate new housing for new employees locating to the area, particularly for the new employment opportunities announced for North County Monaghan in 2018. Providing homes that are considered to be of a more upscale commodity in Emyvale will allow for less commuting times, better quality of life, immersion into the community, and an overall sense of betterment for the village.

(c) - To Designate The Submission Land As An Appropriate Location For A Nursing Home.

- The designation of the submission lands for a nursing home would be consistent with the objectives of the National Planning Framework and Age Action Ireland programme. There is currently no nursing home facility in the Emyvale and North Monaghan area. The development of such a facility will allow elderly persons stay living within their communities. It will also provide additional long-term and intermediate care spaces where demand is expected to increase significantly by 2030. A nursing home in Emyvale will also ease capacity constraints at other nursing homes in County Monaghan.

(d) - Request Changes/Additions To The Draft Monaghan County Development Plan 2019-2025.

- The recommended changes/amendments to the Draft Development Plan aim to reverse the restrictions for nursing home developments in Tier 4 settlements, where there is an excellent provision of medical services, transport links and infrastructure within Tier 4 settlements, it will encourage nursing home developments to take place where there is a need to serve the local village and rural hinterland. The recommended changes/amendments to the Draft Plan will adhere to the provisions National Planning Framework (NPF) and the Age Action Ireland programme where the primary aim is to encourage 'Age Friendly Communities' where older people are to be accommodated within existing communities where access to services is easily available.

Yours faithfully,



Stephen Ward

ORIGINAL ARTICLES

1. The Effect of the "Milkmaid" on the Health of the Child
 [Author names and affiliation]

2. The Effect of the "Milkmaid" on the Health of the Child
 [Author names and affiliation]

3. The Effect of the "Milkmaid" on the Health of the Child
 [Author names and affiliation]

4. The Effect of the "Milkmaid" on the Health of the Child
 [Author names and affiliation]

5. The Effect of the "Milkmaid" on the Health of the Child
 [Author names and affiliation]

6. The Effect of the "Milkmaid" on the Health of the Child
 [Author names and affiliation]

7. The Effect of the "Milkmaid" on the Health of the Child
 [Author names and affiliation]

8. The Effect of the "Milkmaid" on the Health of the Child
 [Author names and affiliation]

9. The Effect of the "Milkmaid" on the Health of the Child
 [Author names and affiliation]

10. The Effect of the "Milkmaid" on the Health of the Child
 [Author names and affiliation]

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