



DRAFT MONAGHAN COUNTY DEVELOPMENT PLAN 2019-2025

Chief Executive's Report on Submissions and Observations



Report Contents	Page No.
Section 1	
1.1 Introduction and overview	2
1.2 Strategic Environmental Assessment	3
1.3 Appropriate Assessment	3
1.4 Content and format of report	3
Section 2	
2.0 Legislative background	5
2.1 Stage 3 - Proposed Amendments	6
Section 3	
List of bodies/persons who made submissions	7
Section 4	
- Summary of submissions, Chief Executive’s Opinion & Recommendations in relation to Objectives and Policies	11
- Summary of submissions, Chief Executive’s Opinion & Recommendations in relation to Settlements.	
Monaghan	82
Carrickmacross	109
Castleblayney	126
Clones	146
Ballybay	149
Tier 4 & 5 Settlements	
Emyvale	154
Inniskeen	159
Smithborough	161
Tydavnet	162
- Supplementary Recommendations	163

**Please note the accompanying Map Booklet should be consulted in conjunction with this document.*

Section 1

1.1 Introduction and Overview

Notice of the preparation of the Draft Monaghan County Development Plan 2019-2025 and Environmental Reports (Strategic Environmental Assessment, Appropriate Assessment and Strategic Flood Risk Assessment) was given on the 15th of March 2018 in accordance with the requirements of Section 12 of the Planning and Development Act 2000 (as amended) in the Northern Standard newspaper. Press releases were also published in The Anglo Celt and the Dundalk Democrat along with an advertisement slot on Northern Sound radio.

The Draft Plan and Environmental Reports were available to view online at www.monaghan.ie and at the following locations from the 15th of March 2018 to the 25th of May 2018;

- The Planning Office, Monaghan County Council, The Glen, Monaghan.
- Monaghan Municipal District Offices, The Glen, Monaghan
- Castleblayney/Carrickmacross Municipal District Offices, Riverside Road, Carrickmacross
- Ballybay/Clones Municipal District Office, Monaghan Road, Clones
- Monaghan Library North Road, Monaghan
- Carrickmacross Library, Riverside Road, Carrickmacross
- Castleblayney Library, Iontas Centre, Castleblayney
- Clones Library, 98 Avenue, Clones
- Ballybay Library, Main Street, Ballybay

Public Workshops on the Draft Plan were held in each of the towns as follows:

Tuesday 10 th of April	Market House , Monaghan	6-8pm
Thursday 12 th of April	Civic Offices, Carrickmacross	6-8pm
Tuesday 17 th of April	Gate Lodge , Castleblayney	6-8pm
Wednesday 18 th of April	Ballybay Wetland Centre	6-8pm
Monday 23 rd of April	Clones Library	6-8pm

In addition to this the Forward Planning Team addressed the PPN (Public Participation Network) at a meeting in St Joseph's Parochial Hall on the 19th of April and the Local Community Development Committee (LCDC) on 8th May 2018.

Submissions or observations with regard to the Draft Plan and Environmental Reports were invited from the 15th of March to the 25th of May 2018 inclusive. A total of 94 submissions or observations were received during this period.

The Chief Executives Report on the submissions and observations received during this public consultation period is hereby submitted to the members of the Planning Authority for consideration.

1.2 Strategic Environmental Assessment (SEA)

An SEA is carried out to comply with the provisions of the Planning and Development (Strategic Environmental Assessment) Regulations 2004. The purpose of the SEA report is to provide a clear understanding of the likely environmental implications of decisions regarding the adoption and implementation of the Draft Plan following a detailed analysis. The Chief Executive's recommendations as set out in this report have been assessed to determine whether they would have any significant effects on the environment. Subject to the implementation of mitigation measures which have been integrated into the Draft Plan, it is considered that the material amendments proposed following consideration in the Chief Executives report would not have any significant adverse impacts on the environment. Proposed Material Amendments will be screened for the need to undertake a SEA. The results of this screening exercise along with (if deemed necessary) a full SEA will supplement any proposed material alteration that is placed on public display following consideration of the Draft Plan and this Chief Executive's Report.

1.3 Appropriate Assessment

As required by the provisions of the EU Habitats Directive (92/43/EEC) and Section 177 of the Planning and Development Act 2000 (as amended), alterations proposed on foot of this Chief Executives report will be appropriately screened to determine whether they would have a significant effect on one or more Natura 2000 sites. It was concluded that the amendments proposed on foot of these recommendations, along and in combination with other plans and projects, would not have any significant effect on any Natura 2000 site.

1.4 Content and Format of Report

This report has been prepared in accordance with the requirements of Section 12 of the Planning and Development Act 2000 (as amended). Section 1 of the report is the Introduction, Section 2 outlines the legislative background and Section 3 lists the persons/bodies who made submissions during the public consultation period. Section 4 sets out a summary of the various issues raised in submissions

and observations received. This section also sets out the Chief Executives' response and recommendations in relation to these specific issues, including recommendations for amendments to the Draft Plan in certain instances. Section 5 outlines various miscellaneous amendments to text and policies of the Draft Plan which are being recommended following internal consultation of the Draft Plan. This report is also accompanied by a Map Book which provides the context for submissions received specific to the land use zoning requests.

Where it is proposed to modify the text of the Draft CDP this is indicated as follows:

- Text proposed to be added is shown in red ink
- ~~—Text proposed to be deleted is show in red strikethrough~~

Where it is proposed to change the zoning of a site, reference is made to the relevant page number in the 'Map Book' under the Chief Executives Recommendation.

The report forms part of the statutory requirements/procedures for the preparation of the Monaghan Country Development Plan 2019-2025.

Section 2

2.0 Legislative Background

The Planning and Development Act requires that the Chief Executives report shall:

- List the person or bodies who made submissions or observations.
- Summarise the issues raised by the Minister for Housing, Planning, Community and Local Government, the Northern and Western Regional Assembly and outline recommendations of the Chief Executive in relation to the way those issues and recommendations should be addressed in the Development Plan.
- Summarise the issues raised by other bodies and people.
- Give the response of the Chief Executive to the issues raised, taking account of;
 - Any directions issued by the members of Monaghan County Council under Section 11 (4),
 - The proper planning and sustainable development of the area,
 - The statutory obligations of any local authority in area,
 - Any relevant policies or objectives of the Government or of any Minister of the Government.

The Chief Executives Report on the Draft Plan Consultation is submitted to the Elected Members of the Planning Authority for consideration. In accordance with Section 12 (5 (b) of the Planning and Development Act 2000 (as amended), the members must conclude their review of the Chief Executive's report and the Draft Development Plan within 12 weeks of receiving the Report.

At this stage, the Members are required to consider all the following:

- The Draft County Development Plan;
- The Environmental Report (SEA);
- The Appropriate Assessment Screening Report;
- The Chief Executive's recommendations contained in this Report.

The Planning and Development Act 2000 (as amended) indicates the following:

“Where, following the consideration of the draft development plan and the manager's report, it appears to the members that the draft should be accepted or amended ... they may, by resolution, accept or amend the draft and make the development plan accordingly” (S. 12 (6))

“In making the development plan ... the members shall be restricted to considering the proper planning and sustainable development of the area to which the development plan relates, the statutory obligations of any local authority in the area and any relevant policies or objectives for the time being of the Government or any minister of the Government.” (S. 12 (11))

Further to consideration of the Chief Executives Report and the Draft Development Plan, the Planning Authority can either make the plan or materially alter the plan. If the Planning Authority is directed to make the Plan, it comes into effect four weeks from the date the resolution is made. An additional period of public consultation is necessary if it is resolved to alter the Draft Plan and where the amendments proposed are deemed to be material. The Planning Authority must subsequently determine whether a Strategic Environmental Assessment or an Appropriate Assessment, or both are required to be carried out in respect of these amendments.

2.1 Proposed Amendments – Stage 3 of the Development Plan Review

In the event that a proposed amendment(s) would, if made, be deemed to be a material alteration of the Draft Plan, it is a requirement under Section 12(7) of the Planning and Development Act 2000 (as amended) for the Planning Authority to publish a notice of the Proposed Amendment(s) within a period of 3 weeks from the passing of the resolution. The amendment(s) must be available for public inspection and written submissions or observations can be made from the public for a minimum period of 4 weeks. A further Chief Executive's Report must be prepared within 8 weeks of the published notice of the proposed amendment(s).

Not later than 6 weeks after the submission of Chief Executives report on the Material Amendments, the Elected Members must make a resolution to make the County Development Plan without amendments.

If it is determined that a Strategic Environmental Assessment and/or or an Appropriate Assessment is required to be carried out in respect of one of more of the proposed material alterations, it is a requirement (within 2 weeks of the determination) of the Planning Authority to publish notice of the proposed material alteration and the determination to carry out the assessment(s).

Section 3

3.0 List of bodies/persons who made submissions

Submission Ref	Name	Page No
13	Dept. of Housing, Planning and Local Government	11
19	Northern and Western Regional Assembly	19
5	Meath County Council	25
7	Fermanagh & Omagh District Council	26
8	Local Link Cavan Monaghan	27
9	John O'Rourke	29
12	Irish Heart Foundation	31
15	Environmental Protection Agency	33
16	Mid Ulster District Council	37
17	Transport Infrastructure Ireland	38
18	Sinead Loughran	45
24	Noel McGahon	46
28	Irish Water	49
29	C Grimley	51
33	Louth County Council	52
38	Irish Concrete Federation	53
50	Inland Fisheries Ireland	55
51	Transition Monaghan	56
52	Keep Ireland Open	58
68	Margo Smyth	60
75	Department of Education & Skills	61
79	Cllr PJ O'Hanlon	62
81	Faillte Ireland	63
83	Gaeltacht Energy Services	65
85	Waterways Ireland	67
87	Farney Community Development Group CLG	70
88	Joe McMeel	71

89	Armagh Banbridge and Craigavon Borough Council	73
90	Lough Bawn Trustees, c/o Tony Bamford Planning (TBP)	74
93	CS Pringle Consultants	76
94	National Transport Authority	80
	Monaghan Settlement Plan	82
4	Residents of Killyconnigan	82
25	Gerard Clerkin	83
30	Vincent Mallon	84
32	Patrick Ruxton	85
39	Moffett Investment Holdings, c/o McGuigan Architects	86
40	Eamon Coyle, c/o McGuigan Architects	87
41	David Patton, c/o McGuigan Architects	88
42	Francis McGuigan, c/o McGuigan Architects	89
43	Francis McGuigan, c/o McGuigan Architects	90
46	IJM Timber Engineering Ltd., c/o McGuigan Architects	91
47	Residents of Killyconnigan, c/o Brian Finnegan	92
54	Sean McKenna	93
55	Francis McGuigan, c/o McGuigan Architects	94
56	Killian Coyle, c/o Hughes Planning & Development Consultants	95
57	Tommy Martin, c/o McGuigan Architects	96
63	Cumann Luthchleas Gael Mhuineachain, c/o Kenneth D. Lonergan & Associates Ltd.	97
69	Leslie Crawford and Mrs Kanokphorn Crawford	98
71	Quest II Fund 900104, c/o FJ Coyle & Associates	99
72	Barry Aughey, c/o FJ Coyle & Associates	101
73	Mon Commercial Holdings, c/o FJ Coyle & Associates	102
82	The Maxol Group, c/o Tom Phillips & Associates	103
86	Marian Logue	104
91	The Real Meals Company Ltd and Arthur Mallon Foods	105
92	Arthur Mallon Foods	105

Carrickmacross Settlement Plan		109
3	Patrician High School	109
31	P. Rogers & Sons Ltd, c/o Finegan & Jackson	110
34	John Paul Kiernan, c/o Finegan & Jackson	111
59	Gerry Eakin, c/o Kenneth D. Lonergan & Associates Ltd.	112
60	Michael Connolly, c/o Kenneth D. Lonergan & Associates Ltd.	113
61	Vanessa McMahon, Clive McMahon, Yolanda McMahon, Karl McMahon, c/o Kenneth D. Lonergan & Associates Ltd.	114
62	Paddy and Eileen Lonergan, c/o Kenneth D. Lonergan & Associates Ltd.	116
64	Jim McBride and Colm McBride, c/o Kenneth D. Lonergan & Associates Ltd.	117
65	Jim McBride and Colm McBride, c/o Kenneth D. Lonergan & Associates Ltd.	118
66	Peter McMahon T/A McMahon and Eakin Ltd., c/o Kenneth D. Lonergan & Associates Ltd.	119
67	Brian Ward and Breda Moroney Ward, c/o Kenneth D. Lonergan & Associates Ltd.	120
74	Michael & Emer McKittrick, c/o EHP Services	121
76	Dermot Conlon, c/o Finnegan & Jackson	123
Castleblayney Settlement Plan		126
2	Patrick McBride, Peter Coleman & Macartan Lambe	126
10	Fiona & Brian McGuinness	127
14	Janette Coogan	128
22	JC Developments Ltd, c/o PDES Consultants	130
26	Paul MacCormack, c/o CS Pringle	132
35	Berwat Construction Ltd, c/o Fenton & Associates	133
36	Berwat Construction Ltd, c/o Fenton & Associates	134
44	Francis McGuigan, c/o McGuigan Architects	135
45	Joe Brennan & Pierse Hughes, c/o McGuigan Architects	136
48	Jason Hughes, c/o CS Pringle	138
49	Harry Hughes, c/o CS Pringle	139
58	Francis Carragher, c/o CS Pringle	140

75	Department of Education	141
84	Castleblayney Hurling Club, c/o CS Pringle	142
	Clones Settlement Plan	146
1	Peader Mackle, c/o Noel Murphy	146
70	Danhall Ltd., c/o FJ Coyle & Associates	147
	Ballybay Settlement Plan	149
6	Carolin & Harry Dooney	149
11	David & Mairead Caraher	150
53	Cathal Friel, c/o Kieran O'Reilly Design & Building Consultancy	151
77	Propatunity Ltd. c/o The Planning Partnership	152
	Tier 4 & 5 Settlements	154
	Emyvale	154
20	Mairead Loughran	155
27	Steve Lavery, c/o Finegan & Jackson	156
37	Pat McKenna, c/o Patrick Ruxton	157
78	Martin Conroy, c/o Stephen Ward Town Planning & Development Consultants Ltd.	158
	Inniskeen	159
21	PJ & EJ Doherty Ltd, c/o PDES Consultants	159
	Smithborough	161
80	H. Boylan & Sons Ltd, c/o CS Pringle	161
	Tydavnet	162
23	Bride Square Properties Ltd, c/o PDES Consultants	162

Section 4

4.0 Summary of Submissions & Issues Raised & Chief Executives Opinion & Recommendations

Submission No	Name/Organisation
13	Department of Housing Planning and Local Government

Summary of Submission & Issues Raised

The Draft Plan provides a strategic framework for the proper planning and sustainable development of the area and provides spatial expression to the economic, social, cultural and environmental aims of the county.

Submission requests that a number of matters be addressed to ensure that the draft plan complies with the legislative and policy framework for planning.

Appropriate Density/Urban Form

- The proposed densities set out for the five towns are very low and inconsistent with compact urban development. The Departments statutory guidelines encourage densities of 30-40 units per hectare within existing settlement centres and 20-35 outside centres.
- Strongly recommends increased densities especially within the urban envelopes of Monaghan town, Carrickmacross and Castleblayney and this aspect of the Draft Plan should be revisited to ensure policies are in line with the guidelines.

Industry, Enterprise and Employment Zonings

- Supports the aims of the Draft in further strengthening and developing the economic and employment base of County Monaghan.
- Proposed zoning objectives for employment related uses are significant additions to the towns particularly Monaghan, Carrickmacross and Castleblayney which give rise to the scope for ad-hoc and piecemeal development to the detriment of co-ordination in infrastructure provision and effective place-making.
- Request that a more effective rationale for such objectives by reference to effective demand for such development lands and a phasing and infrastructure delivery plan for such objectives taking account of the sequential approach to development is set out.

Additional Minor Observations

- The National Planning Framework is now published and should be referenced in greater detail and in particular to reiterate certain National Policy Objectives as they relate to sections and subjects throughout the Plan.

- References to the Regional Planning Guidelines should be revised to reference the Northern and Western Region RSES.
- The River Basin Management Plan was launched in April 2018 the Draft Plan should be updated to reflect the status of the RBMP.
- The Strategic Flood Risk Assessment and the Draft plan should be updated to reflect the production of the Flood Risk Management Plans approved by the Minister in April 2018.
- The Sustainable Urban Housing Design Standards for New Apartments 2018 should be referenced in Section 5.7 of the Draft plan.

Chief Executive's Response

Appropriate Density/Urban Form

The Core Strategy of the Monaghan County Development Plan 2019 aims to ensure sustainable development of the county by setting out to increase the population of the County that lives within existing settlements from 37% to 41% over the Plan period, in accordance with National Policy Objective 3c of the NPF.

Demographic analysis within these settlements over the 2013 plan period indicates that whilst the population increased in Monaghan and Carrickmacross towns, the population of Castleblayney, Clones and Ballybay decreased. The rural area of the County had a population growth of 591 persons whilst the combined population growth in the settlements was only 300 persons. Furthermore only 43 new houses were developed within the urban settlement boundaries of all the towns since 2013. This evidence highlights an unsustainable pattern of growth for County Monaghan whilst also indicating that the designated settlements currently do not offer a sufficient variety of choice in the housing market when compared with the one-off house type.

High densities on greenfield sites in County Monaghan have not assisted in stimulating this market choice and pattern of development over the 2013 plan period. Furthermore, the largest greenfield site zoned for residential development within County Monaghan is 8.2hectares which is not substantial in size when compared with zoned residential lands in the larger towns of Ireland. A density of 35units per hectare would yield 280 units which is a scale of development that towns in County Monaghan have not experienced in over fifteen years and trends indicate they are unlikely to be reached over this plan period either. Ultimately the aim of the Development Plan and the Core Strategy is to focus residential development within the settlements as opposed to the rural area in accordance with the targets set out in the National Planning Framework.

All towns within County Monaghan have a population of less than 10,000, with a minimum 60 min journey time from the major cities. 'The Guidelines for Planning Authorities on Sustainable Residential

Development in Urban Areas' therefore consider the towns of County Monaghan as 'Small Towns' and the advice set out in the Guidelines to have a plan led approach for the development of towns and villages of County Monaghan has been taken. Through the sequential zoning of lands and incentives within Chapter 15 (Policy UDP2, 3, 4) the promotion of the development of brownfield and/or vacant sites within these towns is encouraged to contribute to the principle of compact towns in line with Section 6.3 (b) of the Guidelines and National Policy Objective 6 of the NPF. Furthermore Section 2.4.1 and Table 2.4 of the Core Strategy recognises that a proportion of future urban development will occur on infill/brownfield/regeneration lands by providing that 20% of the population growth within each settlement will be provided for through development on these sites.

The densities set out in the Core Strategy are lower than those recommended in the guidelines but there is no policy within the Monaghan County Development Plan prohibiting higher densities in locations where site conditions enable higher densities to be achieved, indeed Section 15.7.6 and Policy RDP2 requires compliance with the guidelines in this regard. Notwithstanding this, it is acknowledged that this policy could be strengthened particularly for sites within the larger settlements.

The Core Strategy Housing Land Requirement calculations have regard to the fact that not all sites within the settlements of County Monaghan will yield the preferred high density due to issues like topography. The practical application of multiplying a site area by a density assumption to produce an estimate of site capacity is more complicated due to the drumlin landscape which typifies a number of sites in Monaghan and Carrickmacross particularly. For example, within Monaghan town 60% of the sites zoned as 'proposed residential' have challenging gradients, will therefore require extensive site works to be construction ready, this has implications for the quality of development that will ensue. Therefore, the specified density is considered an average density achievable within the settlements across the wide range of lands being zoned. It is not in any form prescribing that a density of 20 units per hectare is what each site should be achieving.

Whilst the density provision set out in the guidelines is noted, it is considered that this standard should not be used as a prescriptive standard across all towns nationally. The Guidelines acknowledge that *" local authorities have a vital role to play in encouraging development through the provision of services....and in utilising their extensive local knowledge in identifying new development opportunities"* to encourage sustainable forms of development. The Core Strategy has used this local knowledge and taken a more holistic view of patterns of residential development within the County. It ultimately aims to deliver more sustainable development patterns within the urban areas to alleviate continued and increasing pressure for housing within the rural areas of the County over the

plan period. This is in keeping with the principles set out under 6.3 (d) of the Sustainable Residential Developments in Urban Areas (2009).

In order to assist market conditions, stimulate population growth within the designated settlements, provide a variation in house type choice, it is submitted that the density provision set out in the Core Strategy will assist in stimulating the growth of County Monaghan's urban centre's over the plan period and therefore should be retained.

Industry, Enterprise and Employment Zonings

The support of the Department with respect to the further strengthening and developing of economic and employment base in County Monaghan is welcome.

The increase in lands zoned for employment uses, particularly in the larger towns close to the N2 national routes, will provide opportunities for job growth and economic development. It is considered that Monaghan can offer a strategically located cost-effective base from which to do business with its advantageous location, one hour from both Dublin and Belfast, and an existing successful business community that spans Agri food to retail and e-commerce. Furthermore, with six out of ten employers indigenous to the County it is submitted that, combined with lower costs of business set ups, County Monaghan is an attractive proposition for new business investments. In addition, the proximity to the border during the ongoing Brexit circumstances needs to be acknowledged and its potential recognised.

A high priority is the creation of higher skilled jobs that might stem the flow of young educated people out of the County and increased co-operation with the Education and Training Boards and indigenous companies to ensure that apprenticeships are available to students of County Monaghan.

The NPF recognises that Monaghan is included in the north-eastern functional area that includes County Louth where a key influence is the Dublin – Belfast cross border network. The increase in lands zoned for employment uses within the settlement plans for the main towns demonstrates the priority that the local authority is placing on stimulating economic activity and sustainable jobs within the County.

Additional Observations

It is acknowledged that the Draft Plan was prepared before the NPF was published and hence references to the national policies and objectives set out in the NPF need to be included in the Monaghan County Development Plan.

Advised revisions to other text sections to include reference to the RSES, RBMPs, adopted FRMPS and the New Apartment Guidelines is noted.

Chief Executive's Recommendation

1. To revised Policy RDP3;

To generally require ~~developers to provide for a higher density of units as well as~~ a mixture of housing types within multi-unit residential schemes, including single storey units to create sustainable balanced communities.

2. To insert text in Section 1.12 in relation to the NPF;

The National Planning Framework, which is the overarching planning policy for the state, was published in February 2018 under Project 2040 and contains ten National Strategic Outcomes and numerous National Policy Objectives. This planning framework sets out where development and investment should be guided to shape the national, regional and local spatial development in economic, environmental and social terms to 2040. In summary it provides for;

- ▶ 50% of overall national population and employment growth to be directed to the five cities of Dublin, Cork, Limerick, Galway and Waterford
- ▶ Large and smaller towns, villages and rural areas to accommodate the other 50% of population.
- ▶ Improved national infrastructure grid in terms of mobility, communications, energy systems and essential public and community services and facilities.
- ▶ A more effective balance of growth between Ireland's three regions (Northern & Western, Eastern & Midland, Southern Region).
- ▶ Northern and Western and Southern Regions combined to grow at broadly comparable rates to the Eastern and Midland Region.
- ▶ Major new policy emphasis on renewing and developing existing built-up areas rather than continual expansion and sprawl into the countryside.
- ▶ Target of at least 40% of new housing nationally to be delivered within the existing built-up areas
- ▶ Significant proportion of national population and economic growth targeted at building up the fabric of smaller towns, villages and rural areas

3. To include in Table 1.0 and 1.1;

NPF 2040 – The National Planning Framework (NPF) is a national high-level strategic plan for shaping the future growth and development of the country up to 2040. It is a region focused strategy for managing growth and is linked to the National Development Plan which is a ten-year investment plan. It is a framework which will guide public and private investment, create and promote opportunities whilst protecting and enhancing the environment. Monaghan is

located within the Northern and Western Regional Assembly Area. The NPF also recognises that Monaghan is also part of a North East functional area where a key driver is the Dublin-Belfast cross border economic corridor.

National Development Plan 2018-2027

This plan sets out the significant level of investment which will underpin the NPF and drive its implementation over the next ten years. This will guide national, regional and local planning and investment decisions to ensure appropriate regional development that will cater for increased population and ongoing employment maintenance.

Regional Policies & Strategies

Regional Spatial & Economic Strategy (RSES) – Sets out the key strategic assets, opportunities and challenges for the Northern & Western Regional Assembly as well as setting out the policy responses to ensure that people's needs for housing, jobs, ease of travel and overall well-being are met up to 2030 and beyond.

4. Revise Section 2.3.2 to omit references to 'hub town', replace with reference to the National Planning Framework and include as appropriate the National Policy Objectives.
5. Revise title of Section 2.4.2 ~~Housing Land Requirement (HLR) 2019-2039~~ as 'Housing Need Demand Assessment 2019-2025'.
6. Revise Section 4.3 to replace reference to the RPGs with reference to the Northern and Western Region RSES.
7. Revise Section 8.2 as follows;

~~The River Basin Management Plan 2018-2021 (RBMP) is being developed for Ireland. Previously Monaghan was located within two catchment regions, North Western International River Basin and Neagh-Bann. The Plans for these catchment regions expired in 2015 and their objectives were not achieved. The process for preparing the next RBMP is well underway and it will be published in early 2018. The River Basin Management Plan 2018-2021 was published in April 2018 and outlines the measures required to improve water quality in Ireland's groundwater, rivers, lakes, estuarine and coastal waters over the next four years. It aims to protect and improve water quality in 726 of Ireland's 4,829 water bodies as required under the Water Framework Directive (WFD). The RBMP covers the entire geographical area of the Republic of Ireland. The plan will encompass a new approach to catchment management and includes selected waterbodies for action. It also includes a more detailed specific explanation for water quality related issues and has identified those water bodies~~

~~which are at risk of meeting their Water Framework Directives (WFD) objectives. A programme of measure and objectives for County Monaghan has been identified as part of the plan.~~

8. ~~Revise Section 8.5 as follows;~~

~~The River Basin Management Plan 2018-2021 (RBMP) is being developed for Ireland. Previously Monaghan was located within two catchment regions, North Western International River Basin and Neagh Bann. The Plans for these catchment regions expired in 2015 and their objectives were not achieved. The process for preparing the next RBMP is well underway and it will be published in early 2018. The RBMP covers the entire geographical area of the Republic of Ireland. The plan will encompass a new approach to catchment management and include selected waterbodies for action. It also includes a more detailed specific explanation for water quality related issues and has identified those water bodies which are at risk of meeting their Water Framework Directives (WFD) objectives. A programme of measure and objectives for County Monaghan will be identified as part of the plan.~~

~~The River Basin Management Plan 2018-2021 was published in April 2018 and outlines the measures required to improve water quality in Ireland's groundwater, rivers, lakes, estuarine and coastal waters over the next four years. It aims to protect and improve water quality in 726 of Ireland's 4,829 water bodies as required under the Water Framework Directive (WFD). The plan encompasses a new approach to catchment management and includes selected waterbodies for action. In Monaghan the selected areas for action are: Maghera, Killroosky Lough cluster, Avaghon, Glyde/Proules and Mountain Water. These areas will be subject to more detailed scientific assessment and investigative works over the duration of the RBMP.~~

9. ~~Insert in Section 8.33 as follows;~~

~~Nationally the CFRAM programme studied 80% of the primary cause of flooding in communities that house almost two thirds of the national population. This was the largest study of flood risk ever undertaken and followed best practice.~~

~~In April 2018 the Flood Risk Management Plans and associated flood maps produced by the Office of Public Works (OPW) through the CFRAM programme and parallel projects were finalised by the Minister. The Flood Risk Management Plans (FRMPs) set out flood relief schemes that have already been constructed and provide the outline for 118 new proposed schemes. Flood Risk Management Plans (FRMPs) have been produced for Monaghan town, Ballybay and Inniskeen and set out recommendations for works that will alleviate the flood risk in these settlements.~~

10. Revise Section 15.7.5

The Sustainable Urban Housing; Design Standards for New Apartments (~~2015~~ 2018)

11. Update the SEA Environmental Report to reflect the adoption of the River Basin Management Plan.

Submission No	Name/Organisation
19	Northern & Western Regional Assembly

Summary of Submission & Issues Raised

- The National Planning Framework envisages a population growth of 180,000 for the region which will be apportioned across the region and the 9 local authorities therein. It is likely that Monaghan town will be identified as a regionally important town which is suitable for targeted growth in the Regional Spatial & Economic Strategy (RSES)
- The projected growth to 2025 is considered to be reasoned within the context of the RPGs but it will be necessary upon adoption of the RSES to review same and vary the Development Plan as required.

Core Strategy & Housing

- The NPF requires that a Housing Needs Demand Assessment (HNDA) is undertaken however further guidance and clarification on the detail of this model is still to be outlined and it is likely that its introduction will require a review of all core strategies outlined in County Development Plans.
- Agree with the settlement hierarchy set out in the Core Strategy, and the low output of housing in the towns and villages since 2013 is noted. The target set out in the NPF is to deliver 30% of all new homes within existing settlements and the Monaghan County Plan should reflect this.
- Section 2.4.2 provides for lower density housing in urban centres and is relevant to NPO 18b in NPF, view this lower density provision as not being appropriate in all towns and villages below Tier 2 in the settlement hierarchy and should not apply this blanket approach to Monaghan town, Castleblayney or Carrickmacross.

Infrastructure

- The submission recommends that the strategic value of the route of the N2-A5 upgrade and the East West Link (Dundalk/Cavan/Sligo) should be reflected and highlighted in the Draft Plan.
- The submission recommends the inclusion of a specific objective that facilitates any infrastructure necessary as a result of Brexit.
- Monaghan town has a ratio of jobs to resident workers > 1.0 and may have greater potential to grow. RSES is likely to identify Monaghan Town as a centre for accelerated growth, which will expedite population and employment growth between now and 2026.

- Greater clarity needed in respect of Section 4, Policy INP1 of Plan which states a preference for locating large scale industry in the towns, with consideration given elsewhere in exceptional circumstances. The range of exceptional circumstances should be clarified in order to bring certainty to prospective developers.

Economic Development

- The NPF has profiled the four main centres of employment in Monaghan and the RSES is likely to identify Monaghan town as a centre for accelerated growth which is likely to expedite population and employment growth up to 2026.
- Greater clarity should be provided in respect of Section 4, Policy INDP1 which caters for exceptional circumstances where prospective development may be accommodated. The setting out of a precise range of circumstances may benefit the policy and serve to bring certainty to this limited provision.

Environment, Renewable Energy and Climate Change.

- Plan does not adequately detail policies and objectives as required in Chapter 3 of the Wind Energy Guidelines and the Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy & Climate Change and Wind Energy Development Guidelines 2006 and Circular PL5/2017.
- Plan should provide additional direction on Monaghan County Council's policy on Solar Energy and potential medium to large scale projects in this sector.

Chief Executive's Response

Core Strategy & Housing

It is accepted that as new strategies and guidelines are adopted at National and Regional level with respect to the HNDA and the RSES a variation of the Monaghan County Development Plan 2019-2025 may be necessary.

The Core Strategy sets out to provide 75% of the new units provided over the Plan period within the urban settlements and as such accords with National Policy Objective 3c.

The provision of the lower density housing within all settlements in the hierarchy is an attempt to stimulate self-building within the towns as opposed to this house type only being available within the rural area. Analysis has established that only 43 new houses were developed within the urban settlement boundaries of all the towns since 2013. This evidence highlights an unsustainable pattern of growth for County Monaghan whilst also indicating that the designated settlements currently do not offer a sufficient variety of choice in the housing market when compared with the one-off house type. It is therefore considered paramount that the larger settlements, where demand for housing is

currently growing, provides for this low-density housing choice to ensure that these settlements can reach the target populations over the plan period.

It is not intended to consider the low-density housing as a 'blanket approach' within the settlements. A new land use zoning category of 'Proposed Residential B' has been introduced for the five largest settlements in order to indicate those lands which are deemed suitable for low density residential development.

Infrastructure

It is welcomed that the East West Link Road is recognised by the Regional Assembly as an infrastructure priority for the Central Border Region and it is acknowledged that its value and linkages should be reflected and highlighted in the Monaghan County Development Plan.

Consideration will be given to the inclusion of a specific objective to facilitate any necessary infrastructure required to manage the outcome of Brexit.

The NWRA acknowledgment and support for the restoration of the Ulster Canal and the Ulster Canal Greenway is welcomed.

The publication of the National Greenway Strategy provides further opportunities for linkages with adjoining counties as part of an overall regional network is also welcome.

Economic Development

The inclusion of Monaghan town as a centre for accelerated growth within the RSES is welcome.

It is considered that Policy INDP1 provides such clarity by linking such a proposal to being 'tied to a fixed resource and/or require extensive sites or specific settings', thereby requiring a demonstration within the proposal as to why the proposal cannot be located within a designated settlement.

Environment, Renewable Energy and Climate Change.

A review of Chapter 5 in relation to the documents listed will ensure that the Plan adequately details the policies and objectives as required.

Chief Executive's Recommendation

1. To insert a new policy after Section 7.1

Policy TI 01 To facilitate any necessary infrastructure required and necessary to manage the consequences of the UK leaving the EU to ensure strong links along the border are maintained.

2. To amend Section 7.2 as follows:

Regional Planning Context

There are a number of routes within or in close proximity to County Monaghan that provide strategic linkages between the larger urban settlements within and outside the county and carry significant volumes of traffic. The improvement and further development of these links is an

important means of providing access from the region to airports and sea ports in the east, particularly those links which have a cross-border dimension.

~~Monaghan is part of the North Western Regional Authority which includes the Counties of Cavan, Monaghan, Leitrim, Monaghan and Sligo. The current guidelines in force are the Border Regional Planning Guidelines 2010-2022, this is a long term strategic planning document which aims to direct future growth of the border region.~~

There are ~~four~~ five key road transport linkages in the region;

- ~~Northern Radial Route~~ Dublin – Belfast Corridor (M1/A1)
- North Western Route (N2/A5)
- Central Radial Route (N3/M3/A509)
- ~~Western Radial Route (M3/M4)~~
- East West Link Road (Dundalk/Sligo route)

3. To revise Section 8.12 as follows;

~~Current National Policy in relation to energy is set out in the following publications; Energy Policy Framework 2007-2020, That National Energy Efficiency Action Plan 2015, the Strategy for Renewable Energy 2012-2020 and the most recent Energy White Paper – Irelands Transition to a Low Carbon Energy Future 2015-2030.~~

Regard shall be had to the following national plans, policies and strategies when considering proposals for renewable energy, and in particular, wind energy developments:

- The National Renewable Energy Action Plan 2010 (Irish Government submission to the European Commission);
- The Government's Strategy for Renewable Energy 2012 – 2020 (DCENR);
- The Government's White Paper on Energy Policy - Ireland's Transition to a Low Carbon Energy Future 2015-2030 (DCENR);
- The Government's National Mitigation Plan, July 2017 (DCCA).

4. To insert into Section 8.12;

Projects involving indigenous sources of energy such as solar, landfill gas, biomass, energy crops, forestry waste, biogas from sewage sludge and farm slurry will be assessed with the prime policy of the Planning Authority to permit developments that are environmentally sustainable and in accordance with the proper planning and sustainable development of the area. The provision of natural gas as an energy resource will be pursued for the major settlements of the County with the appropriate authority.

5. To revise Section 8.14;

~~When determining applications for wind farm development the planning authority will have regard to the provisions of the Wind Energy – Guidelines for Planning Authorities, DoEHLG 2006 and any relevant updates. The guidelines are currently under review and it is expected that the revised guidelines will make additional provisions to deal with noise, shadow flicker and amenity concerns arising from wind farms.~~

The Planning Authority will adopt a favourable approach to wind energy developments provided they are sited so as not to cause a serious negative impact on the special character and appearance of the landscape, designated conservation areas, protected structures or sites of archaeological importance. The challenge is to achieve a balance between responding to government policy on renewable energy and enabling wind energy resources of the County to be harnessed in an environmentally sustainable manner. The Wind Energy Strategy, Planning Guidelines', DECLG, 2006, and any subsequent guidelines, are the primary guidance document to be used in the preparation and assessment of wind energy proposals. Regard will be had to the 'European Best Practice Guidelines for Wind Farm Development' (European Wind Energy Association).

The Irish Wind Energy Association (IWEA) indicates that the wind capacity for County Monaghan of 24.6MW is provided by two wind farms at Mullanalt and Tossy/Lough Mourne. The wind energy potential available in the County is indicated in Sustainable Energy Irelands Wind Atlas for Ireland available at <http://maps.seai.ie/wind>.

The assessment of wind energy development proposals will include consideration of the following as appropriate;

- Sensitivity of the landscape and adjoining landscapes to wind energy projects.
- Scale, size and layout of the project, any cumulative effects due to other projects and the degree to which impacts are highly visible over extensive areas.
- Visual impact on protected views and prospects, designated scenic landscapes as well as local visual impacts.
- Impact on nature conservation, ecology, soil, hydrology, groundwater, archaeology, historic structures, public rights of way and walking routes.
- Local environmental impacts including noise and shadow flicker.
- The visual and environmental impacts of associated development such as access roads, plant and grid connections.
- The implications of extensive cabling beneath the public road.

All proposals for wind energy developments shall include an assessment indicating the impact of the proposed development on protected bird and mammal species. An Environmental Impact Statement may also be required as part of any planning application for a large scale commercial wind turbine scheme.

Submission No	Name/Organisation
5	Meath County Council

Summary of Submission & Issues Raised

- Meath County Council are committed to supporting and facilitating Transport Infrastructure Ireland, Monaghan County Council, Louth County Council and Fingal County Council in the delivery of upgrades to the N2 which is considered an essential infrastructural development.
- Suggest that a specific policy be included to reflect the strategic national importance of this route.
- Meath County Council acknowledges and welcomes the inclusion of Policy CFP 12 which refers to a partnership approach in respect of the provision of greenways (Lakeland Greenway)

Chief Executive's Response

Submission welcomed and noted. It is recommended that a specific policy be included in the plan which supports and prioritises the enhancement of the N2 route.

Chief Executive's Recommendation

1. To include a new policy NRP7

To seek to progress and ensure the upgrade of the N2 in co-operation with Transport Infrastructure Ireland and the relevant adjoining local authorities.

Submission No	Name/Organisation
7	Fermanagh and Omagh District Council

Summary of Submission & Issues Raised

- Fermanagh and Omagh District Council acknowledges that the issues facing Monaghan are similar in nature to those facing Fermanagh and Omagh and that the policies proposed in the Draft Plan are an appropriate response to these challenges and issues.
- The submission acknowledges the potential benefits of cross border co-operation to further cohesive planning in the border area.
- The route of the Ulster Canal Greenway which falls within the jurisdiction of the Fermanagh and Omagh District Council will be safeguarded for future tourism/recreation use.
- The importance of the need to improve strategic transport routes such as the N2/A5 upgrade for the overall border area is strongly acknowledged.
- Submission recognises the importance of cross border co-operation in the conservation of this landscape habitat of Sliabh Beagh.
- No recommendation to provide additional policy changes/controls in the Sliabh Beagh area due to the substantive International and National designations in place, however it is acknowledged that beyond these designated sites there is likely to be continued interest from wind energy companies for wind energy development due to the wind resource available in this area.

Chief Executive's Response

Submission welcomed and noted.

Chief Executive's Recommendation

No amendment recommended.

Submission No	Name/Organisation
8	Local Link Cavan/Monaghan

Summary of Submission & Issues Raised

- Local Link was established in 2014 by the National Transport Authority and coordinates 70 public transport services across Cavan and Monaghan.
- Responsible for development of new passenger transport services and two new commuter services were developed and launched providing options up to 9 times per day for passengers to access employment, education, health or social needs in Monaghan town from Tydavnet, Scotstown, Ballinode and Ballybay.
- Also manage transport on behalf of other state bodies in the Cavan/Monaghan area and work closely with those agencies to develop integrated transport models and strive for efficiencies in the use of their transport resources.
- Submission suggests several policies and actions for Monaghan County Development Plan all of which support an integrated transport service linking the villages and main towns in Monaghan.

Chief Executive's Response

The roll out of the Local Link within Monaghan provides an important sustainable service to link up the surrounding rural areas with Monaghan town. The project has grown significantly this year and this expansion should be highlighted within Section 7.15 of the Plan. It is acknowledged that a policy which provides for co-operation and the NTA, regional agencies and transport providers may be useful.

Chief Executive's Recommendation

1. Insert in Section 7.15;

In 2017 two new commuter services 'M1 Tydavnet, Scotstown, Ballinode to Monaghan' and 'M2 Ballybay to Monaghan' were developed providing up to nine times per day timetabled options for passengers to access employment, education, health or social needs in Monaghan town.
2. Revise Policy PTP1; ~~To support the provision of new transport routes and infrastructure by public and private transport operators in County Monaghan~~ To support, where possible an integrated public transport service linking the villages and main towns in Monaghan that will

assist in promoting the sustainable development of the county and service the needs of communities and businesses.

3. Revise Policy PTP2; To support and co-operate where possible with the National Transport Authority and Cavan Monaghan Transport Co-ordination Unit to further the continued operation and expansion of the Local Link bus service ~~operated by Cavan Monaghan Transport Co-ordination Unit and any other relevant operators providing such a service in the County~~ and facilitate the planning, delivery and implementation of improvements to the transport network of the County.
4. To insert in Monaghan Settlement Plan after Section 10.8 the following policy (and revise policy numbers thereafter);

Policy MP08 To investigate the feasibility of creating a town centre 'hub' that caters for public bus and taxi connections"
5. To insert in Table 9.2 Strategic Objectives for all towns within County Monaghan;

SSO18 To develop subject to resources sustainable transport solutions within and around the major towns in the county that encourage a transition towards more sustainable modes of transport stops.

Submission No	Name/Organisation
9	John O' Rourke

Summary of Submission & Issues Raised

- The submission quotes the applicable ribbon development policies contained in the Monaghan County Development Plan 2013-2019 and requests an amendment to the existing footnote 21 '*Or in exceptional circumstances where an individual with a landholding of less than 4ha and a minimum of 0.2ha which he or she has owned for a minimum period of 5 years prior to the date of submission of a planning application*'.
- It is suggested that this amendment will not discriminate landowners owning less than 4ha /10 acres and should benefit all landowners, not just those with the most land

Chief Executive's Response

The Sustainable Rural Housing Guidelines 2005 expressly prohibits the creation of ribbon development in rural areas. An exception to this policy was introduced in the Monaghan County Development Plan 2007-2013 to allow a relaxation of this policy in instances where planning permission was being sought on the grounds of meeting the housing needs of a landowner (being defined as an individual with a landholding of at least 4ha owned for a minimum period of five years and where no other suitable site exists on the landholding). The requirement to own a minimum landholding of 4ha for five years to qualify for a relaxation of this policy was considered necessary to prevent speculative development which would dilute the purpose of the policy to cater for applicants with a genuine rural housing need. It is considered that a relaxation of the minimum landholding to 0.2ha would significantly weaken this policy and could exacerbate ribbon development in the rural area.

In considering the request to reduce the minimum landholding size to qualify for a relaxation of the ribbon development policy consideration has been given to a similar submission No 24 (page 46 of this report). This submission also seeks a relaxation on the minimum landholding size to 0.2ha but suggests that the lands must be owned for a minimum period of 20 years.

It is acknowledged that the request to consider the minimum landholding requirement of 0.2ha where the lands have been in owned for 20 years is reasonable and sufficient to prevent speculative development and to protect rural character. In order to minimise the potential impact of this further relaxation on rural character it is considered prudent that this exception should apply for one instance only.

Chief Executive's Recommendation

To amend policy RHP5 and the associated definitions as follows

Policy RHP5

To resist development that would create or extend ribbon development. A relaxation of ribbon policy on regional and local roads will be considered where planning permission is sought on the grounds of meeting the housing needs of a landowner or a member of his/her immediate family,** and where no other suitable site is available on the entire landholding.*** The planning authority will apply an occupancy condition for a period of seven years in such cases.*

** A landowner is defined as an individual with a minimum landholding in the local rural area of 4 hectares which he or she has owned for a minimum period of 5 years prior to the date of submission of the planning application **In circumstances where less than 4 hectares is owned a relaxation shall be permitted where the landowner or an immediate family member has owned the lands in excess of 20 years. This relaxation on the minimum landholding size shall apply for one instance only.***

*** Immediate family is considered to be a **grandparent**, sibling, son or daughter or adopted child of a landowner. Where the landowner(s) child(ren) have resided outside the state or Northern Ireland for a minimum continuous period of 10 years, or where the landowner has no children, a niece/nephew maybe considered a landowner's family member.*

**** In the event that no other suitable site is available on the landholding the planning authority will consider all lands within the ownership of the applicant. A dwelling will only be granted where there are no alternatives available.*

Submission No	Name/Organisation
12	Irish Heart Foundation

Summary of Submission & Issues Raised

- The submission requests the inclusion of a specific objective in the Development Plan to 'Promote a Healthy Environment' and that reference is made to four policies in section 1.12 which sets out the strategic policy objectives of the plan.
 - Cross Government Public Health Framework, Healthy Ireland - A Framework for improved Health and Wellbeing 2013-2025
 - Better Outcomes Brighter Futures: The national policy framework for children and young people 2014-2020
 - A Healthy Weight for Ireland: Obesity Policy and Action Plan 2016-2025, and the Local Government Policy Local Area Plans – Guidelines for Planning Authorities.
- The submission requests the introduction of no fry zones within 1km of any school and that Monaghan County Council place the promotion of healthy environments at the core of the development plan.
- The submission recommends that the strategic aim of the plan should be strengthened to reflect the health as well as the economy of the county to ensure that land use decisions and the planning process will be "health checked". This should include a commitment to invest money in infrastructure which promotes public health and reject proposals which will negatively impact on the health of the community.
- It is recommended that the development plan includes a commitment to addressing health inequalities across the county.
- Submission welcomes commitment to promote and facilitate development of waterways and healthy lifestyle in several policies of the Plan.

Chief Executive's Response

It is acknowledged that land use planning has a significant role in creating and supporting healthy communities and Strategic Objective 6 of the Plan seeks to '*improve the quality of life of all who live and work in County Monaghan*'. As acknowledged in the submission, there are numerous policies set out in the Plan which seek to promote healthy living for example, policies to provide cycle ways, walkways, tourism initiatives, protection and promotion of heritage and environmentally sensitive sites. Furthermore, the land use zoning matrix set out in Table 9.5 only permits hot food takeaways within the town centre sites whilst the majority of education facilities are located outside of the town

centre and it is therefore considered that the zoning matrix gives sufficient protection in respect of incompatible developments.

Chief Executive's Recommendation

No amendment recommended.

Submission No	Name/Organisation
15	Environmental Protection Agency (EPA)

Summary of Submission & Issues Raised

- The submission suggests that the proposed zoning set out in the Core Strategy be described in the context of consistency with key high-level plans such as the National Planning Framework 2040, Catchment Flood Risk Assessment and Management Strategy (CFRAMS) and the Regional Spatial and Economic Strategy (RSES).
- Infrastructural Projects referenced in the plan should be planned and implemented in accordance with the requirements of the Environmental Impact Assessment (EIA), Habitats, Floods and Water Framework Directive as well as linking the zoning to the ability to provide adequate and appropriate critical service infrastructure.
- The Plan and Strategic Environmental Assessment (SEA) Environmental Report (ER) should highlight the need to adequately mediate any contaminated soils /material /groundwater that may be identified in implementing Local Area Plans
- The plan should include appropriate climate change adaptation and mitigation measures which align with the objectives and commitments of the National Policy on Climate Action and Low Carbon Development
- The catchment management approach to protect and manage water quality as advocated in River Basin Management Plan should be integrated into the plan and implemented particularly with regard to intensive agricultural activities.
- The submission notes the inclusion of specific policy for Intensive Agriculture AGP2 and suggests that there is merit in referencing Policy AG01 elsewhere in the plan
- Submission suggests including a summary of how the aims and objectives of INTERREG V Programme are to be integrated into the Plan as per those referenced in Appendix 1 of the SEA and refers to projects to be considered in assessing transboundary aspects of the Plan.

Specific Comments on SEA Environmental Report

- To reflect its importance, it is suggested that the Non-Technical Summary of the SEA is included as part of the main SEA Environmental Report and that Table 10.1 Selected Indicators, Targets and Monitoring Sources should be included in the Non-Technical Summary.
- Suggest that a summary of the key environmental considerations identified in submissions received at scoping stage be included in Section 3.4.

- Suggests that the climate related Strategic Environmental Objective (C1) in Table 5.1 reflects the wider aspects of climate change mitigation and adaptation and that the SEA ER should incorporate a section outlining how climate change mitigation and adaptation measures have been taken into account in preparing the Plan.
- In respect of Table 9.1 Integration of Environmental Considerations it is suggested that the full range of likely significant effects (Schedule 2B (f) of S436/2004) have been considered.
- Section 4.11 Overlay of Environmentally Sensitivity Mapping and Figure 4.14 Overlay Mapping of Environmental Sensitivities is welcomed, and it would be useful to reference areas at risk of high levels of radon.
- The National Greenway Strategy currently being prepared by Department of Transport, Tourism and Sport should be considered.
- Any available mapping in respect of habitat/green infrastructure should be utilised in the context of protecting biodiversity and associated ecosystems. If this information is not currently available, a commitment to undertaking such a mapping exercise within the lifetime of the plan is recommended.
- In respect of Table 10.1 Selected Indicators, Targets and Monitoring Sources. The monitoring programme should be flexible to allow consideration of both positive and negative effects and to allow the possibility of cumulative effect and unforeseen adverse effects to be identified and resolved as required. It is recommended that the review programme should be linked with the monitoring/reporting of the plan to allow an assessment of the effectiveness of any mitigation measures.
- A SEA Statement should be prepared following adoption of the Plan and copy sent to any environmental authority consulted during the SEA process.

Chief Executive's Response

The Draft Plan was prepared before the NPF, CFRAMS and RSES were published and references to these documents will be updated and included. The comments/recommendations in relation to the SEA Environmental Report are noted and the suggested amendments will be included in the final SEA Environmental Report.

Provisions have been integrated into the Plan to comply with legislation relating to environmental protection and the Plan has been assessed by the SEA which has identified that the Plan would be likely to result in positive effects on the protection of various environmental components.

Section 8.28 contains requirements in relation to contamination and remediation which will have to be complied with at local area plan and/or project level as relevant.

The Plan contains provisions in relation to the National Mitigation Plan and the National Adaptation Framework however an update is recommended on one of these provisions. The EPA's 'Local Authority Adaption Strategy Development Guidelines' will be considered in the implementation of Policy CCP3.

The requirement to screen the likely significant effect of proposed amendments in accordance with Schedule 2A of the SEA Regulations is noted. In relation to Climate Change recommendations/comments made in this submission, Policy CCP2 has an objective to prepare a Climate Change adaptation strategy for County Monaghan. The catchment-based approach as recommended in the River Basin Management Plans is recognised and advocated in the Plan and reference to the published RBMPs will be included. The correct cross reference for this section is Policy AGP1 in Section 15.15 which must be complied with by individual projects as appropriate.

Specific to SEA Environmental Report

A reference to European Union INTERREG Programme will be included in Appendix 1 to the SEA ER. The Non-Technical Summary will be presented as part of the main SEA Environmental Report when documents are finalised at the end of the Plan preparation process. Table 10.1 will be included in the Non-Technical Summary.

It is proposed to include a summary of the key environmental considerations in Section 3.4 of the SEA Environmental Report "Scoping".

A section shall be included in the SEA Environmental Report outlining how climate change mitigation and adaption measures have been taken into account in the preparation of the Plan.

The columns on 'Significant Positive Effect likely to occur' and 'Residual Adverse Non-Significant Effects' from Table 8.3 in the SEA Environmental Report will be added to Table 9.1.

The Greenway Strategy is currently being prepared and can be added to the plans and programmes listed at Appendix 1 of the SEA Environmental Report.

Chief Executive's Recommendation

1. To insert the following text in Section 2.0 Core Strategy;

A Strategic Flood Risk Assessment (SFRA) has been undertaken alongside the preparation of the Plan and has helped to facilitate the appropriate zoning of areas that are at elevated risk of flooding. The findings of the SFRA and the OPW FRMPS have been integrated into the Plan and the SEA to help ensure the implementation of the Flood Risk Guidelines at all tiers of decision making and will help to facilitate improvement in the levels of sustainable drainage in the County.

2. To update Policy CP1 as follows;

To support and encourage the implementation of the National ~~Climate Change~~ Adaptation Framework 2018 and any updated versions during the lifetime of this Development Plan.

3.0 To amend the SEA Environmental Report as follows;

- a) To include reference to European Union INTERREG Programme in Appendix 1 to the SEA ER.
- b) To include Table 10.1 in the Non-Technical Summary.
- c) To include a summary of the key environmental considerations in Section 3.4 of the SEA Environmental Report "Scoping".
- d) To include a section in the SEA Environmental Report outlining how climate change mitigation and adaption measures have been considered in the preparation of the Plan.
- e) To add the columns on 'Significant Positive Effect likely to occur' and 'Residual Adverse Non-Significant Effects' from Table 8.3 in the SEA Environmental Report to Table 9.1 of the ER.
- f) To include 'The Greenway strategy' in the plans and programmes listed at Appendix 1 of the SEA Environmental Report.
- g) To revise text in Section 10 Monitoring as follows;

A Stand alone Monitoring Reports on the significant environmental effects of implementing the Plan will be prepared both at the interim review of the achievement of the Plan objectives and in advance of the beginning of the review of the Plan.

Submission No	Name/Organisation
16	Mid Ulster District Council

Summary of Submission & Issues Raised

- Submission considers that the economic strengths and regional identity of Mid Ulster and its neighbouring counties should be recognised, and enhanced road linkages and infrastructure are key to the success of this to allow mutual benefit between both jurisdictions.
- Upgrade of the N2/A5 is key along with the upgrade to the A29.
- Ongoing interaction between the councils, in the form, of the Cross-Border Forums, discusses a number of shared issues and a draft Statement of Common Ground has been drafted.

Chief Executive's Response

The ongoing cross border engagement is noted and welcomed.

Chief Executive's Recommendation

No amendment recommended

Submission No	Name/Organisation
17	Transport Infrastructure Ireland (TII)

Summary of Submission & Issues Raised

The general positive alignment of the Draft Plan with official policy is acknowledged and welcomed. Notwithstanding this, there are a number of specific interactions between land use policy and the strategic national road network in County Monaghan that the TII consider require review prior to the adoption of the Development Plan.

- TII would welcome the inclusion of a Core Strategy Objective to maintain the strategic capacity and safety of the national road network and to safeguard the investment in national roads.
- Notes that Policy NRP2 provides for developments of national and regional strategic importance in exceptional circumstances. It is requested that any proposals for 'exceptional circumstances' should be prepared in accordance with the provisions of Section 2.6 of the DoECLG Spatial Planning and National Roads Guidelines and TII is available to assist the Council in development of proposals for consideration as 'exceptional circumstances'.
- Requests a review of repetition included in NRP3 in relation to 'exceptional circumstances' which appears to conflict/contradict with Policy NRP4.
- Notes there are a number of legacy locations on the existing national road networks that are not identified for 'exceptional circumstances' in the Draft Plan and consideration could be given to projects and schemes of national and/or regional importance, however TII acknowledges it is a matter for the Council to develop cases for agreement.
- Policies INDP1, INDP6 and INDP8 seek to facilitate proposals in a rural environment. It is recommended that an appropriate cross reference with Policy NRP1 to safeguard the safety and operation of the national road network and to restrict access outside the urban speed limit zones for towns and villages would provide added transparency to the Draft Plan and ensure clarity for future applicants/developments, and in particular to forms of development that may be facilitated in the rural area and have the potential to directly impact on the strategic national road network. TII would welcome such a cross reference in relation to Section 4.6 and Policy AGRP2, Section 4.7 and Policy TMP12, Section 4.8 and Policy ERP12, Section 4.9 and associated policies, Section 4.10 and Section 15 Development Management Standards.
- Collaboration between the Council and TII on access strategies for lands in Monaghan town should continue and in circumstances where agreements are made, they should be included in the Development Plan.

- The Design Manual for Roads and Bridges (DMRB) has been superseded and references to this document should be updated.
- Request that any mapped schemes referred to in Section 7.8 are the most up to date and relevant scheme information available prior to Plan adoption.
- The implementation of all national road schemes is subject to budgetary constraints and TII priorities in relation to national roads also includes the maintenance of the existing national road network, including junctions and safeguarding the exchequer investment in national roads to date.
- A number of roads proposals identified in Table 7.5 relate to the five key towns and as included in the settlement plans interface with the strategic national road network and should be developed in consultation with and subject to the agreement of TII.
- Section 7.13 identifies the Corridor and Route Selection Process however all national road projects are required to be progressed in accordance with the statutory process and TII publications including the project management guidelines and project appraisal guidelines and this should be included in the interest of clarity.
- Request that the TII Traffic and Transport Assessment (TTA) Guidelines are further referenced in the Draft Plan including thresholds advised in the 2014 Guidelines, sub threshold TTA requirements, relating specifically to development proposals affecting national roads. Area Based Transport Assessment guidance notes have also been recently published and may be a useful resource.
- Draft Plan should include requirements of Road Safety Audit (RSA) and Road Safety Impact Assessment (RSIA) prior to adoption.
- Welcomes and acknowledges reference to the Spatial Planning Guidelines in Section 15.5 and requests that reference to the TII Policy on the Provision of Tourism and Leisure Signage on National Roads is also included.
- Request that Section 3.7 of the DoECLG Spatial Planning and National Road Guidelines regarding noise generating uses should be included in Section 8.39 of the Development Plan.
- Section 2.8 of the DoECLG Spatial Planning and National Road Guidelines with regard to provision of off-line motorway service areas at national road junctions should be reflected in the development plan prior to adoption.
- Requests that appropriate consultation with TII occurs on the preparation of any Local Area Plans and LUTS referenced.
- Monaghan Town Settlement Plan

- Request any road improvements as outlined in Section 10.8.1 would be complementary to safeguarding the strategic function of existing national roads and be consistent with identified strategic national road schemes.
- Considers the preparation of a LUTS is essential for the proposed industrial link road from N12 Armagh Rd to N2 Dublin Road and would welcome an update in this regard given that access proposals for these lands are in locations where 100kph speed limits apply, contrary to official policy.
- Lands zoned for employment uses at Tullygrimes along the N54 are also at a location where 100kph speed limit applies. Previous discussions for access to these lands from a point within the reduced speed limit 50-60kph need to be clarified in the development plan prior to adoption.

Carrickmacross Settlement Plan

- The zoning proposals for employment uses to the east of the N2 and adjoining the northern N2 junction do not include access proposals, are removed from the remainder of zoning in the town and do not appear to represent a logical sequential development of the town. This approach is considered inconsistent with safeguarding the strategic function of the national road network.
- TII is concerned that no evidence base has been undertaken to demonstrate that accessibility, access proposals and additional traffic loading generated by such a zoning objective can be satisfactorily accommodated at this location on the N2 while safeguarding the strategic function of the network.
- Strongly recommends a review of the subject zoning proposal as there appears more favourable lands available to assist in consolidating the zoning envelop of Carrickmacross.
- Other zoning proposals are primarily contained within the N2 bypass however, TII recommend that development proposals in proximity to the N2 junctions are appropriately assessed to ascertain the implications of traffic generation on the safe and efficient operation of the N2 and associated junctions.

Castleblayney Settlement Plan

- Recommends that development proposals in proximity to the N2 junctions are appropriately assessed to ascertain the implications of traffic generation on the N2 and are subject to Traffic and Transport Assessment as appropriate.
- Appears that limited zoning proposals extend outside of the 50-60kph speed limit along the N53 and it is recommended that access to the lands identified would be accommodated within the reduced urban speed limit area to ensure compliance with official policy. Clarification on this matter in the development plan prior to adoption would be welcome.
- TII have no record of consultation in relation to a Part VIII approved in 2014 for access to the N2 from the Killycard industrial Estate which at the time was blocked and out of use. Clarification sought on the use of the direct access to the N2 and the lands served in the interests of safeguarding the strategic function of the N2 and adherence to the provisions of official policy.

Clones Settlement Plan

- Requests that a co-ordinated access strategy in compliance with the Guidelines is devised for the zoned lands adjoining the N54 to the north east of the town.
- Any development proposals on these lands should be appropriately assessed to ascertain the implications of traffic generation on the safe and efficient operation of the N54. Proposals should consider the cumulative impact of development in the area when undertaking a TTA.

Tier 4 & 5 Settlements

- The proposed development limit for Smithborough extends east of the village along the N54 at a location where a 100kph speed limit applies. It is requested the Council review the proposed development limit or consider access requirements having regard to the Guidelines.
- Emyvale's development limit extends north along the N2 where a 60kph speed limit applies. In accordance with the Guidelines, the TII requests a review of the development boundary or the preparation of an access strategy to be included in the Plan.
- The implications for other dispersed settlements that are situated on the national road network at locations where 100kph speed limit applies, like Tyholland, should be considered in the interests of road safety and to ensure adherence with official policy.

Chief Executive's Response

The inclusion of a strategic objective with regard to the capacity and safety of the national road network is considered appropriate given that the N2 route is identified as part of the TEN-T Comprehensive Network and the important links within, to and from the County of the N12, N53 and N54.

To ensure compliance with the 2012 Guidelines in respect of Policy NRP2, reference to the guidelines should be made within the policy wording.

It is acknowledged that Policy NRP4 would cause confusion and conflict. To ensure adherence with the provisions of official policy and in the interests of clarity it is considered this policy should be deleted.

All policies of the plan are applicable to all development proposals being assessed and cross referencing is not considered necessary. Notwithstanding this, text should be included in Chapter 15 Development Management stating this to ensure that no ambiguity exists in this regard.

The ongoing engagement with the TII in relation to the Monaghan LUTS is acknowledged and appreciated. Any updated outcomes in relation to the forthcoming study will be revised as required in the Plan including the provision of additional linkages, access strategies and sustainable transport projects.

All references to the DMRB will be revised to refer to the relevant TII publications. Any maps referred to will be the most up to date at the time of publication of the Plan. Additional text shall also be included in Section 7.12 to provide clarity and avoid any risk to the projects set out in Table 7.5.

The requirements of the TII TTA and RSA are set out in Appendix 13 and 14 of the Plan, however it is acknowledged that reference to these documents and the information set out in the appendices should be made in Section 7.1. It is also considered that Appendix 14 should be expanded to include information relating to RSIA.

Reference to the TII publication on the provision of tourism and leisure signage on national roads shall be included. Reference to Section 2.8 and Section 3.7 of the Guidelines with respect to road side service facilities and noise mitigation measures should be included in the Plan.

It is acknowledged that any route improvements undertaken will be complementary to safeguarding the strategic function of existing national road and will not impact negatively on identified strategic national road schemes.

The additional lands zoned for industry/employment uses within the settlement plans are indicative of the priority the local authority is placing on stimulating economic activity and the creation of sustainable jobs within the County. It is also acknowledged that direct access onto the national route would only be considered whereby any such proposal would adhere to the Spatial Planning and

National Roads Guidelines, and where possible access to these lands should be accommodated within the reduced urban speed limit area.

Chief Executive's Recommendation

1. To include in Section 1.11;

~~Strategic Objective No 8; To maintain the strategic capacity and safety of the national roads network and to safeguard the investment in national roads.~~
2. To revise Policy NRP2 as follows:

~~Notwithstanding NRP1, To consider, in exceptional circumstances, permitting access onto national roads for developments of national and regional strategic importance may be considered~~ where the locations concerned have specific characteristics that make them particularly suitable for the developments proposed, subject to such developments being provided for through the Local Area Plan or Development Plan making process ~~in accordance with Section 2.6 of the DoECLG Spatial Planning and National Road Guidelines, including and in consultation with the TII and ongoing commitment to road safety for all road users.~~
3. To delete Policy NRP4 to ensure consistency and clarity and re-number policies accordingly.

~~To provide for limited development along stretches of national primary road in the 60kmph zone where a less restrictive approach to that outlined in the Spatial Planning and National Roads – DoHELG 2012 may be applicable. Such sites may be considered in exceptional circumstances for developments of a national or regional strategic importance with the potential to deliver significant economic and employment benefits and subject to meeting the criteria set out in Section 2.6 (1)(1-10) of the 2012 Guidelines.~~
4. To include in Chapter 15 Development Management Section 15.1;

All projects and proposals shall be considered against the relevant policies, objectives, standards, technical criteria and guidance contained elsewhere within this Plan as well as those set out by Chapter 15 of the Plan.
5. To revise and include as required any updated recommendations in the Monaghan LUTS.
6. Revise references to DMRB to ensure all relevant standards as set out by TII publications are referenced and all maps of road schemes in Section 7.8 to be as up to date as is possible at the time of publication of the Plan.
7. To include the following text in Section 7.12;

Any improvements relating to national roads identified at a local level will be done in consultation with and subject to the agreement of TII. The proposals identified in Table 7.5 should be developed having regard to the requirement to safeguard the strategic function of

the national road network. Section 7.13 outlines the 'Corridor and Route Selection Process' however all national road projects are required to be progressed in accordance with statutory processes and TII publications, including the Project Management Guidelines and Project Appraisal Guidelines.

8. To include the following text in Section 7.1, a new policy TPO8 and expand Appendix 14;
Planning for significant development proposals should be accompanied with a 'Traffic and Transport Assessment' (TTA) and a 'Road Safety Audit' (RSA) which are assessed in association with their cumulative impact with other relevant developments on the road network. The 'TII Traffic & Transport Assessment Guidelines 2014' and requirements as set out in Appendix 13 (a) must be complied with along with the guidance set out in the TII/NTA Area Based Transport Assessment Guidance notes (ABTA).
Policy TPO8; To require the submission of a Traffic and Transport Assessment (TTA), Road Safety Audit (RSA) and/or a Road Safety Impact Assessment (RSIA) as deemed necessary in accordance with Appendix 13 and 14 for significant development proposals.
9. To include a new policy NNRP7;
To resist the use of National, Regional and Local roads for advertising purposes and to implement the provisions of the TII policy document "Policy on the Provision of Tourism and Leisure Signage on National Roads" (2011).
10. To include the following text into Section 8.39;
Consideration also needs to be given to avoid adverse impacts when introducing noise sensitive uses in proximity to existing and future national roads. Where warranted proposals should include mitigation and should have regard to Section 3.7 of the DoECLG Spatial Planning and National Roads Guidelines.
11. To include the following text into Section 7.1;
The provision of off-line motorway service areas at national road junctions and road side service facilities on non-motorway national roads and junctions are of a scale where they usually incorporate extensive parking and facilities that include refueling, refreshments and toilet facilities for road users. In any assessment for such a facility regard should be had to Section 2.8 of the DoECLG Spatial Planning and National Road Guidelines and the TII Policy on Service Areas.

Submission No	Name/Organisation
18	Sinead Loughran

Summary of Submission & Issues Raised

- Considers Section 3.6.1 of the Draft Monaghan County Development Plan, which relates to the siting a design of rural housing, should be extended to cover wind farm development so that wind turbines cannot be elevated on a drumlin as it constitutes an even more prominent feature in the landscape than a rural house.

Chief Executive's Response

In all assessments of wind energy proposals, the Council will have consideration to the visual, environmental and amenity impacts to ensure that the drumlin landscape is not unduly impacted upon by any such proposal. All proposals for wind energy must have regard to the provisions of the Wind Energy – Guidelines for Planning Authorities, DoEHLG 2006 and any updated guidelines (including interim Guidelines, 2017). The guidelines contain specific guidance in relation to the siting and arrangement of wind turbine/farms development which all applications for wind energy must be assessed against. In this context it not considered appropriate to apply the same standards to one off rural housing as renewable energy projects, to do so would create a significant limitation or constraint which would impact on the delivery of national targets for renewable energy and climate change mitigation. However, an error in the cross referencing of Policy ENP1 should be amended.

Chief Executive's Recommendation

1. To amend Policy ENP1; To encourage and facilitate energy proposals at suitable locations where it is demonstrated to that the development will not have a detrimental impact on the visual and residential amenities of the surrounding area and assessed in line with the criteria set out in ~~Section 14~~ Section 15.20 of Chapter 15 of the Monaghan County Development Plan 2019-2025.

Submission No	Name/Organisation
24	Noel McGahon

Summary of Submission & Issues Raised

- Requests that the occupancy clause prescribed for in Policy RDP16 of the 2013 Plan (Residential Dwellings and Agricultural Buildings) is amended so that it applies for a minimum period of 10 years after the first occupation of the dwelling for reasons to enable the applicant to sell the property if they wish after this period which will see the development well established in the rural area.
- Section 15.2 'Ribbon Development and Infill' of the 2013-2019 CDP is referenced and a suggested addition to provide for exceptional circumstances where a landowner has less than 4 hectares, but has owned the landholding for 20 years and proof of residence for 20 years in the rural area is provided, which would benefit all landowners and not just those with the most land.
- Suggested text and policy is provided for accommodation for dependent relatives.

Chief Executive's Response

It is accepted that a permanent occupancy clause restricting sale of a dwelling within 100m of an agricultural building is unduly severe and this Section 15.17.2 of the Draft Plan should be revised to provide for a reduced occupancy period of 7 years in line with the occupancy period applicable to permissions in Areas under Strong Urban Influence.

The Sustainable Rural Housing Guidelines 2005 expressly prohibits the creation of ribbon development in rural areas. An exception to this policy was introduced in the Monaghan County Development Plan 2007-2013 to allow a relaxation of this policy in instances where planning permission was being sought on the grounds of meeting the housing needs of a landowner (being defined as an individual with a landholding of at least 4ha and where no other suitable site exists on the landholding).

The requirement to own a minimum landholding of 4ha for a minimum of five years to qualify for a relaxation of the ribbon development policy was considered necessary to prevent speculative development which would dilute the purpose of the exception to cater for applicants with a genuine rural housing need. It is considered that a relaxation of the minimum landholding to 0.2ha on its own would significantly weaken this policy and exacerbate ribbon development in the rural area, however this submission suggests that the lands must be owned for a minimum period of 20 years and that the applicant shall be required to provide proof of residence in the area for 20 years.

It is acknowledged that the request to consider the minimum landholding requirement of 0.2ha where the lands have been in owned for 20 years is reasonable and sufficient to prevent speculative development and to protect rural character. It is considered that the requirement to show proof of residence for 20 years could prove onerous and therefore should not be a specific requirement.

In order to minimise the potential impact of this relaxation on rural character it is considered prudent that this exception should apply for one instance only.

In considering the request to reduce the minimum landholding size to qualify for a relaxation of the ribbon development policy consideration has been given to a similar submission No 9 (page 29 of this report). Both submissions have been considered jointly and a response/recommendation composed on this basis.

Chief Executive's Recommendation

1) Amend last sentence of Section 15.7.2 to read as follows;

"Where written consent has been provided, ~~a condition restricting occupancy of the dwelling shall be included in any grant of permission~~, a condition restricting the first occupancy of the dwelling to the applicant or members of their immediate family or heirs for a 7-year period shall be included in any grant of permission"

2) To amend policy RHP5 and the associated definitions as follows

Policy RHP5

To resist development that would create or extend ribbon development. A relaxation of ribbon policy on regional and local roads will be considered where planning permission is sought on the grounds of meeting the housing needs of a landowner or a member of his/her immediate family,** and where no other suitable site is available on the entire landholding.*** The planning authority will an apply an occupancy condition for a period of seven years in such cases.*

** A landowner is defined as an individual with a minimum landholding in the local rural area of 4 hectares which he or she has owned for a minimum period of 5 years prior to the date of submission of the planning application ~~In circumstances where less than 4 hectares is owned a relaxation shall be permitted where the landowner or an immediate family member has owned the lands in excess of 20 years. This relaxation on the minimum landholding size shall apply for one instance only.~~*

*** Immediate family is considered to be a ~~grandparent~~, sibling, son or daughter or adopted child of a landowner. Where the landowner(s) child(ren) have resided outside the state or Northern Ireland for a*

minimum continuous period of 10 years, or where the landowner has no children, a niece/nephew maybe considered a landowner's family member.

**** In the event that no other suitable site is available on the landholding the planning authority will consider all lands within the ownership of the applicant. A dwelling will only be granted where there are no alternatives available.*

Submission No	Name/Organisation
28	Irish Water

Summary of Submission & Issues Raised

- It is considered that the water supply capacity in the settlements is adequate to meet the 2025 population targets outlined in the draft CDP. Smithborough is the only settlement where an upgrade may be required.
- A list of projects in County Monaghan that are included on Irish Waters 2017-2021 Capital Investment Plan is provided.
- Minor text amendments are suggested to Section 8.11 of the draft Plan and Section 4.8.1.1, Section 4.8.1.2, Table 4.2 of the SEA.
- Recommendations of policy and objectives for inclusion in the CDP in relation to protecting IW assets and environment for the benefit of current and future population served by public water services networks.

Chief Executive's Response

Specific detail in relation to the water and wastewater capacity for the settlements of County Monaghan is welcome and acknowledged, as is the inclusion of the projects listed in the Capital Investment Plan. The minor amendments as requested will be considered as will the policies recommended for inclusion.

At the next iteration of the SEA Environmental Report, the information on Table 4.2 of the SEA Environmental Report will be updated to take account of any subsequent publication of the referenced document.

Chief Executive's Recommendation

1. To revise Section 8.11 of the draft Plan;

~~Irish Water is responsible for the treatment and disposal of wastewater in towns and villages~~
~~Irish Water is responsible for the operation of all public wastewater services in towns and villages~~ *(except current Developer Provided Infrastructure (DPI)).
2. To revise Sections 4.8.1.1, Section 4.8.1.2 and Table 8.2 of the SEA as follows;

Strategic Environmental Assessment, Section 4.8.1.1, paragraph 2,
~~The function and role of Irish Water includes:~~

 - ~~Abstracting and treating water;~~

- ~~• Delivering water and waste water services to homes and businesses;~~
- ~~• Installing water meters and billing domestic and business customers~~

Irish Water is responsible for the operation of all public water and wastewater services including:

- Management of national water and wastewater assets;
- Maintenance of the water and wastewater system;
- Investment and planning;
- Managing capital Projects;
- Customer care and Billing.

Strategic Environmental Assessment, Section 4.8.1.2, paragraph 1;

These vary in size from Monaghan Town Waste Water Treatment Works (WWTW) which has a design capacity of ~~44,000~~ 37,400 population equivalent.

Submission No	Name/Organisation
29	C. Grimley

Summary of Submission & Issues Raised

- Request that the development of serviced sites in villages throughout County Monaghan is allowed if the demand arises for them.

Chief Executive's Response

The provision of serviced sites is permissible in all settlements within County Monaghan under Policy CSP8, Policy RSP1 and VIL1.

Chief Executive's Recommendation

No amendment recommended.

Submission No	Name/Organisation
33	Louth County Council

Summary of Submission & Issues Raised

- Welcomes the objective to improve linkages and communications in County Monaghan.
- Suggests revisions in text in relation to NPF, RPG, Smarter Travel and population figures in Section 3.1.3.
- Welcomes the opportunity to work in conjunction with Monaghan to develop the border kingdoms route as detailed in Policy CFP12
- Draft Plan references Louth being in the NWRA area (Section 7.2), Louth is in the Eastern & Midlands Regional Assembly area (EMRA).
- Welcomes the future upgrade of the N2/A5 route and the upgrade of the N2 north of Ardee to south of Castleblaney bypass.
- Requests the inclusion of objective in Section 7.18 to support the development of the Boyne Valley to Lakelands Greenway which can link in with the transport node in Dundalk.
- Anticipates that Monaghan County Council will take cognisance of visual, environmental and residential amenity issues which may affect County Louth in respect of future proposals for wind farm developments or individual turbine proposals.
- Supports the objective to provide a new link road from the Dundalk Road (N53) directly to the N2 at Castleblaney.

Chief Executive's Response

The comments made in the submission are noted and welcomed. It is considered that Policy CFP12 provides sufficient support to the development of the cross-border greenway route with Louth, Cavan and Meath. Revised text for Section 7.2 as recommended following consideration of Submission No19 will remove the incorrect reference to Louth being within the Northern and Western Region.

Chief Executive's Recommendation

No amendment recommended.

Submission No	Name/Organisation
38	Irish Concrete Federation (ICF)

Summary of Submission & Issues Raised

- Submission acknowledges the significant recognition afforded to the extractive industry in the Draft Plan and in the absence of national aggregate policy, the County Development Plan review process is the only mechanism for strategic policy and provision for the Industry which is vital to the construction industry.
- The importance of the extractive industry cannot be under-estimated, its needs must be provided for and it is crucial that market demand is met by the legitimate industry in a planned and controlled manner. The ICF welcomes the commitment to enforcement highlighted in the Draft Development Plan.
- ICF is supportive of the need for correct assessment of extractive development and would strongly welcome support for the GSI Aggregate Potential Mapping Proposal (2006) in the Monaghan County Development Plan.
- The submission requests that the key relevant documents for standards in relation to the Extractive Industry are highlighted in Section 15.25 of the Development Plan.
- It is requested that the NPWS Guidance on Biodiversity in the Extractive Industry, GSI's Geological Heritage Guidelines and the Archaeological Code of Practice for the Extractive Industry be referenced in the plan. All extractive development applications should be assessed against these important documents.
- ICF Would welcome a commitment to issue permissions with terms commensurate with the resources available for extraction in Section 4.8 of the draft Plan. Requests the insertion of a detailed template of criteria for assessing extractive development applications in Section 15.25 of the plan including stressing the importance of preparing robust applications by professionals with appropriate experience.
- Would strongly welcome specific support for extractive sites as suitable locations for construction and demolition (C&D) waste facilities to maximise the recycling and recovery opportunities for these activities within existing developments, to provide the most efficient use of virgin aggregates, and to ensure the use of recovered inert non-polluting material in the restoration of extraction sites.
- In order to safeguard valuable future extraction sources, applicants for rural housing and other forms of rural development should address the potential impact on extraction sites to ensure such sites are not sterilised or restricted in the future.

- The submission highlights the need to grant permissions with a sufficient time period to support and protect the investment decision and subsequent employment of extractive sites.
- The submission requests that the plan expresses a commitment to ensure adequate development control of all extractive industry operators.

Chief Executive's Response

It is acknowledged that reference should be made to relevant documents/guidelines issued by the relevant bodies as they relate to the extractive industry. It is considered that Policy EIP3 protects the resource potential of quarries from new development in the vicinity of existing extractive sites. The time frames of permissions is determined in accordance with the details provided in relation to the expected lifetime of the extraction as is the assessment of the suitability of such sites relative to rural housing or those sites seeking extensions.

Chief Executive's Recommendation

1. To include the following in Section 15.25:

Any application for an extractive industry should have regard to the Irish Concrete Federation Environmental Code (2005), Guidelines for Environmental Management in the Extractive Sector (EPA, 2006), Guidance on Biodiversity in the Extractive Industry (NPWS), GSI's Geological Heritage Guidelines for the Extractive Industry and the Archaeological Code of Practice.

Submission No	Name/Organisation
50	Inland Fisheries Ireland

Summary of Submission & Issues Raised

- Welcome Policy TMP4 which supports the development of angling tourism initiatives in the country and WPP5 to preserve riparian corridors.
- Submission recommends that the plan include a policy on the prevention of river fragmentation and to encourage the connectivity or re-connectivity of fisheries waters and that Inland Fisheries Ireland (IFI) are consulted in such instances.
- Best practice should be promoted in respect of water conservation in all developments. Water conservation and efficiency are central to any strategy to enhance water supply reliability, , restore ecosystems, and respond to climate change and changing demographics.

Chief Executive's Response

Content of submission is noted, and it is considered appropriate to include a policy to prevent river fragmentation. Matters relating to climate change and water conservation best practice will be considered in the preparation of a climate change adaption strategy as required by Policy CCP2.

Chief Executive's Recommendation

1. To include a new policy as follows:

WPP19 To prevent river fragmentation and to encourage, where possible, the connectivity or the re-connectivity of fisheries waters in consultation with Inland Fisheries Ireland.

Submission No	Name/Organisation
51	Transition Monaghan

Summary of Submission & Issues Raised

- The submission requests that the plan contains an objective for Monaghan County Council to work with other stakeholders in developing a strategy for the development of farmers to support Community Supported Agriculture.
- The development plan should explicitly state that the planting of more broadleaf woodland is important for biodiversity and mitigating climate change and that Monaghan County Council will work with other stakeholders on initiatives in this regard.
- The submission recommends that the plan include a piece on the Sustainable Energy Communities Programme.
- The plan should state an objective that Monaghan County Council will support and assist groups in the county involved in the SEAI Sustainable Energy Communities (SEC) Programme.
- The submission refers to the Government's National Dialogue on Climate Action and suggests that a system of community engagement needs to be implemented to build public support for the action plans on climate change. The development plan should state that Monaghan County Council will as far as possible support and assist relevant groups and agencies in the county involved in initiatives under the National Dialogue.
- The submission recommends that Monaghan County Council work with relevant stakeholders in the further development of emergency plans and support initiatives to cope with weather and other emergencies. The Council should further develop communications strategy in relation to emergency planning and responses.

Chief Executive's Response

It is considered that the development plan has a favourable approach towards agricultural development as set out in Section 4.6 and Section 15.15 and to assist in the preparation of a strategy to support Community Supported Agriculture is not the remit of a development plan. Chapter 8 of the development plan contains a range of policies to promote the use of renewable energy and tackle climate change. Specifically, policy EP9 sets out an aim to work in partnership with local communities to develop energy efficient and renewable energy projects. It is considered that these provisions are adequate to address the issues raised by this submission.

The provisions of Section 7.21, policies ESP1 & ESP2 and Section 8.41, Policy EHZ1 of the development plan are considered sufficient to address the issue of emergency planning in line with the requirements of the Planning and Development Act (as amended).

In reviewing the agricultural development policy, it is noted that there may be some ambiguity in Policy AGP1 with regard to the provision of new agricultural developments on greenfield sites. It is recommended that this policy be amended to address this.

Chief Executive's Recommendation

1. To amend Policy AGP1;

'To permit development on ~~an active new~~ and established agricultural or forestry holdings where it is demonstrated that.... (a) – (m).'

Submission No	Name/Organisation
52	Keep Ireland Open

Summary of Submission & Issues Raised

This is a substantial submission (13 pages) which centres around access to the countryside and directly related issues. The submission requests a large number of minor changes, revisions to paragraphs, policies adapted or copied from other local authority development plans along with various suggestions for relocating policies and revised format of chapters in the Draft Plan, including;

- Request that a sub section on forestry is included as per the 2013 Plan and related policy examples from other CDPs are provided.
- Noted that 'Recreation' no longer has a sub-section with tourism and suggest they should be dealt with together, preferably as a separate chapter. Reference to rally driving and quad biking should be deleted as these are not regard as environmentally sustainable. Farm based tourism should be referenced.
- Suggest additional policies for extractive industry and golf course development with respect to identifying rights of ways prior to any development.
- Cycling and Walking policies in Chapter 7 should be cross referenced with Chapter 5 and any replica references deleted.
- Noted that no progress has been made in listing the public rights of way despite a commitment in the 2013 Plan and submits it is not too late to include a short interim list in the Draft, or failing that remove the reference to resources and substitute with 'within one year of adoption of the plan' as it is an urgent matter.
- Lough Muckno should be designated a national park and the plan should recognise potential world heritage sites like the Black Pigs Dyke & Royal Sites.

Chief Executive's Response

This submission raises a number of points previously raised by Keep Ireland Open at pre-draft consultation stage, and the issues have been considered in the preparation of the Draft Plan. It is acknowledged that forestry should be referenced in the Plan and additional text will be included in Section 4.6 of the Plan to reflect this. 'Recreation' as a term falls into several different categories and chapters of the development plan including tourism, community facilities, heritage, landscape as well as development management and as such it is considered unwarranted to have it as a sub-section in any one chapter. Cycling and Walking are referenced in both Chapter 5 and 7 and whilst they are a widely recognised amenity activity, they are also a mode of sustainable transport within the urban

areas. Anticipated progress in relation to identifying and listing public rights of way has been protracted due to constraints in resources. It remains an objective of the Local Authority to deliver on this when possible. The designation of sites as national parks and/or potential world heritage sites is not the remit of the development plan.

Chief Executive's Recommendation

1. To include additional text in Section 5.11;

The Council recognises the importance of protecting existing public rights of way and their role in facilitating the development of walking trails in areas of high amenity value. Several walking routes exist throughout the county which provide important access networks. This is an important recreational resource the integrity of which should be protected. The impact of any proposed development on these routes should be taken into account when considering applications for permission for developments in their vicinity.

2. To include additional text and policies in Section 4.6;

The importance of forestry development is recognised and can have both a positive and negative environmental effects, forestry can have varying impacts on the landscape, wildlife and bio-diversity. Furthermore, the various larger woods like Rossmore and Lough Muckno, offer significant opportunities to develop tourism. Facilities sensitively located in woods can provide wonderful visitor attractions and create sustainable local employment opportunities.

In 2008 the Department of Agriculture provided its 'Indicative Forestry Statement' (IFS) to provide a high level national guidance in relation to the suitability of land for afforestation and it identifies areas most suitable for planting primarily based on environmental considerations and soil-productivity. Aside from Bragan and Lough Muckno, the majority of rural County Monaghan is indicated as being suitable for commercial forestry.

Policy ARGP6 To protect natural waters, wildlife habitats, conservation areas, heritage areas, prominent landscape features, archaeological sites and scenic routes within forest sites and nature designations from pollution or injury.

Policy ARGP7 To protect access to forestry and other amenity facilities, in co-operation with Coillte and private owners/operators, for walking routes and nature trails for the benefit of local communities and tourists.

Submission No	Name/Organisation
68	Margo Smyth

Summary of Submission & Issues Raised

- Requests that the 'Local Needs' issue is a very harsh that excludes people who are rooted in their communities from securing planning permission to build a home on their own land where the holding is under 10 acres.
- Request local needs to be done away with or relax it to five acres and with a moderate time holding stipulation.

Chief Executive's Response

The identification of 'Rural Areas Under Strong Urban Influence' whereby the local needs policy applies is in accordance with the Government publication 'Sustainable Rural Housing Guidelines' and the policies within the development plan are necessary to comply with the provision of these guidelines. It is considered this position should be retained pending a review of the Rural Housing Guidelines.

Chief Executive's Recommendation

No amendment recommended.

Submission No	Name/Organisation
75	Department of Education and Skills

Summary of Submission & Issues Raised

- Projected population growth of 5867 over the plan period 2019-2025 will create a requirement for an 8-classroom primary school in Monaghan and a 13-classroom primary school in Carrickmacross town.
- Suitable sites should be reserved and zoned for educational use in Monaghan and Carrickmacross.
- The Department recommends that sites be reserved having regard to the Department's Guidance document TGD 25 to inform the assessment of suitable sites for Primary Schools.
- An Acquisition process is underway by the Dept for the provision of a primary school on lands at Bree, Castleblayney. It is requested that this site be zoned for educational/community uses to facilitate this process.

Chief Executive's Response

It is acknowledged that suitable lands must be identified for Community Services/Facilities in Monaghan and Carrickmacross towns with the plan period 2019-2025. The land use zoning matrix set out in Table 9.5 specifies that schools are open for consideration on all residential zoning categories. As such, it is considered appropriate to zone another 1 hectare of land as Residential A within Monaghan and 1.25ha in Carrickmacross town in order to provide suitable land choice for a school site.

In Castleblayney, a site for a school has been purchased by the Department of Education, given the progression of this site for the purposes of a school, it is recommended that these lands be zoned for 'Community Facilities'.

Chief Executive's Recommendation

1. In Castleblayney Town Plan Map CYDP1; amend the land use zoning of 1.7ha of land as 'Community Services/Facilities' instead of 'Proposed Residential B' and 'Strategic Reserve'.
2. To zone an additional 1/1.25 hectare of lands as 'Proposed Residential A' within the settlement plans of Monaghan and Carrickmacross.

Submission No	Name/Organisation
79	Clr PJ O'Hanlon

Summary of Submission & Issues Raised

- Requests that lands zoned as 'existing residential' be amended to state that the redevelopment of large plots through sub-division and the provision of serviced sites should be encouraged where it will not appear out of character with the surrounding area.

Chief Executive's Response

Section 9.2 and Table 9.3 sets out the land use zoning categories and objectives for the settlement plans and states that residential is the principle permitted use within 'Existing Residential'. The sub-division of a large plot zoned as 'Existing Residential' is therefore permissible on this land use zoning subject to normal planning considerations. Although the sub-division of a large plot zoned as 'Existing Residential' is implicitly provided for on this land use zoning subject to normal planning considerations, it is considered that this should be explicitly stated in the land use objective for Existing Residential.

Chief Executive's Recommendation

It is recommended that the land use objective for Existing Residential should be amended as follows:-

2	Existing Residential	<p>To protect and enhance existing residential amenities.</p> <p>Principal permitted land use will be residential. However other uses open for consideration include education, nursing home, creche, health centres, community facilities, guesthouses provided that all such proposals are in keeping with the established built character of the area and do not adversely impact upon the amenity of existing residential properties. The comprehensive redevelopment of large residential plots for proposed residential development will be acceptable subject to the redevelopment proposal being in keeping with the character of the surrounding development.</p>	Peach
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Submission No	Name/Organisation
81	Failte Ireland

Summary of Submission & Issues Raised

- Welcomes the inclusion of tourism within the Economic Chapter and the incorporation of the Tourism Strategy into the policy context.
- Requests that a reference to tourism in Strategic Objective No 5 Natural and Built Heritage is included as well as referenced to the forthcoming RSES.
- Requests greater reference to Ireland's Ancient East Initiative and recommends the insertion of additional text and policies for incorporation into Section 4.7.1 and 4.7.2 as well as the Failte Ireland guidance on sustainable tourism.
- Inclusion of tourism within the settlement plans is welcome however consider that there should be a spatial dimension to tourism development.
- Several text revisions and policy amendments are suggested for the Core Strategy, Settlement Hierarchy, Tourism Section in Chapter 4 and strategic objectives of the settlement plans.

Chief Executive's Response

The support the detailed commentary set out in the submission is welcomed and acknowledged as well as the recognition given by Failte Ireland of the role of tourism in all sectors of the development plan. The format and clarity of the suggested revisions to the text and policies of the Plan are commended.

Chief Executives Recommendation

1. To revise Strategic Objective in Section 1.11 as follows;

No 5 To protect and nurture the County's rich natural resource, heritage, **tourism assets** and amenities along with the environmental quality of the natural and built environment in both the urban and rural areas.

2. To include in Table 1.0 as follows;

Tourism Policy Statement – 'People, Place and Policy – Tourism to 2025'

This was published by the Department of Transport, Tourism and Sport in 2015 and sets out clear targets for the development of Irish Tourism. It is framed within the context of the tourism sector welcoming 10 million visitors by 2025 with associated revenues of €5bn and sustaining 250,000 persons in employment.

Realising our Rural Potential – Action Plan for Rural Development

Through a framework of supports at national and local level, the Action Plan takes a co-ordinated approach across Government to both the economic and social development of rural Ireland. The Plan covers a three-year period and contains a series of time-bound actions which will be monitored and reported on regularly.

3. To expand the aims of the Core Strategy set out in Section 2.0;

No 4. To achieve a lively and vibrant living and working environment for the County's population by making the most of the economic, social and physical development **for the benefit of communities and visitors alike.**

No 6. To promote and support the integration of land use, transport, **public transport accessibility** and to encourage a modal shift to greater use of sustainable modes of transport, including walking, cycling and public transport.

4. To expand the text of Section 4.7 Tourism as follows;

The County's tourism sector has enormous potential for future growth. ~~but in order to optimally develop same, it is essential to promote a sustainable approach, in line with the recommendations of the Regional Planning Guidelines (RPGs) 2010-2022. Paramount to this is creating a tourism package that appeals to likely consumers~~ The Monaghan Tourism Strategy identified that there were over 58,000 overseas visitors to the County in 2013 with an associated revenue of €19 million. Updated Failte Ireland figures indicates that the number of overseas visitors to Monaghan increased to 65,000 in 2016 with overseas tourist revenue of €27million. Tourism is thus an important sector of activity in the County and one which has the added benefit of acting as an external economic driver whilst also significantly improving the quality of life of the residents of the County. Monaghan's relative proximity to Dublin and other large settlements together with its proximity to the border with Northern Ireland offers significant opportunities to expand the existing tourism offer and brand for the County. Furthermore, the County can benefit from the constrained capacity of larger settlements in the region and act as an accommodation base for those visiting the east and north subject to a broadening of the ~~current available tourism accommodation profile.~~ Paramount to this is creating a tourism package that appeals to likely consumers.

5. To expand the text of Section 4.7.1 Product and Appeal as follows;

The NPF recognises tourism as having important potential to contribute to cross border cooperation. It advocates capturing greater international interest by promoting strategic attractions of scale and signature visitor attractions. Opportunities exist to maximize exposure through co-operation and themed branding bundles such as Ireland's Ancient East. Development of blueways and greenways such as the Ulster Canal, also offers potential for an enhanced tourism offering throughout the border area.

6. Insert new policy TMP17

To support the implementation of the Ireland's Ancient East destination brand and to integrate the objectives of Irelands Ancient East with in our tourism promotion and development throughout the county.

Submission No	Name/Organisation
83	Simon Carleton, Gaeltech Energy Services

Summary of Submission & Issues Raised

- Welcomes the inclusion of policies promoting the generation of renewable energy and the recognition that wind energy can make a significant contribution toward reducing greenhouse gas emissions.

Chief Executive's Response

Submission is welcome and noted.

Chief Executive's Recommendation

No amendment recommended.

Submission No	Name/Organisation
85	Waterways Ireland

Summary of Submission & Issues Raised

- Greenways and alternative modes of transport are beneficial as a recreational and tourism asset, and it is suggested that reference should be made to the health benefits of cycling and walking, which is a secondary benefit of sustainable modes of transport in Section 5.9.
- The development of projects such as the Ulster Canal Greenway enable disused waterway infrastructure to be reimagined as green spaces to be enjoyed by the local and broader community.
- Green infrastructure such as the Ulster Canal project is evidence of a co-ordinated approach adopted to develop the cross-border Phase 2 of the Ulster Canal Greenway Project.
- The Ulster Canal will encourage Tourism. This product will be stronger if development of the strategic network of greenways centered around the Ulster Canal and linkages to other strategic greenway routes is encouraged.
- A number of revisions to text and policy in relation to the Ulster Canal are suggested.

Chief Executive's Response

Submission is welcomed and noted. The MCDP 2019-2025 contains a range of policies and objectives to support the delivery of the Ulster Canal Project & Ulster Canal Greenway. Policies TMP13 & CFP11 provide for co-operation with adjoining local authorities. This is considered sufficient to address the issue of connectivity in this submission. The suggested minor wording changes will be recommended for incorporation in relation to the final plan and instances of duplication have been noted and will be addressed.

Chief Executive's Recommendation

1. To revise Policy TMP5 as follows;

To support the continued development of the restoration of the Ulster Canal to Clones and the expansion of the Greenway ~~from Clones to Armagh~~ network in County Monaghan centered on the Ulster Canal.

2. Revised Title of Figure 5.0 as follows;

~~Phase 2~~ Ulster Canal Greenway Network Route Map

3. To revise Policy CFP9 as follows;

To promote and facilitate the development of walkways, ~~and~~ cycleways and recreational trails in appropriate locations throughout the County as identified in the County Walking and Cycling Strategy.

4. To revised Policy CFP11 as follows;

To develop in conjunction with adjoining local authorities and cross border bodies an extension of the ~~Ulster Canal Monaghan~~ Greenway in Monaghan town along the Ulster Canal and including along disused railway lines to connect the main urban centre's and neighbouring villages throughout the mid Ulster region.

5. To insert into Section 6.1

It is important to protect and in present the industrial built heritage of the Ulster Canal. It is also important to plan to interpret and present the story of this linking inland waterway to the local community and the wider population. The development of greenways along the Ulster Canal will bring a better appreciation to the canal's significance in the inland waterway network, of its heritage and will enable the stories of the canals to be told in the community.

6. To revised Section 7.19 as follows;

The Ulster Canal has additional potential other than as a greenway and tourist asset- ~~It is considered that~~ and consideration should be given to its re-opening as a mode of transport within the region.

7. To revised Section 10.10.2 Monaghan Greenway (Monaghan Plan)

The first phase of the Ulster Canal Greenway project opened in 2013, the 4.5km route ~~passes through travels from east to west of~~ Monaghan town along the disused towpath of the Ulster Canal. The greenway has proved very successful with walkers and cyclists and high usage figures have been recorded with more than 100,000 trips made on the greenway in 2015 (102,344) and 2016 (104,385). The facility is used by several walking groups and is utilised during several recreational and charity events throughout the year including the Darkness into Light and the Greenway Challenge. Phase 2 of the Ulster Canal Greenway network will add 22km of new greenway to Phase 1 and extend it westwards to Smithborough and eastwards to Middletown, County Armagh, bringing it to a total length of over 26km of greenway centered around Monaghan town. Subsequent development phases of the Ulster Canal Greenway network will reach the other main urban centres in central Ulster.

8. To include text to Section 13.11 Tourism (Clones Plan)

Development of the amenity of the Ulster Canal will also promote Clones and its environs and encourage tourism. The local tourism product will also be strengthened by the development of a strategic network of greenways centered on the Ulster Canal and linking to other strategic greenway routes.

9. To revised Section 13.11.1 Ulster Canal (Clones Plan)

The Ulster Canal (74.93km in length) stretches from the River Blackwater at Charlemont/Moy Lough Neagh in the centre of Northern Ireland to the river River Finn on the Erne System, and thereby links up the Shannon-Erne Waterway and the inland waterway network at Lough Erne in County Fermanagh with Lough Neagh. Along its route it passes through several towns including Monaghan and Clones. The canal is an invaluable heritage and cultural resource. It shall remain an objective of Monaghan County Council to support the re-opening of the Canal in Clones, due to its potential to improve the economic development and tourism potential for the town. Complementary developments along the Ulster Canal which would benefit Clones include extending the proposed Ulster Canal Greenway network to connect Clones and enhancing the amenity of the Ulster Canal where feasible.

10. Revise CPO7 in Clones Town Plan as follows;

Encourage and accommodate the reopening of the Ulster Canal and complementary developments along the Ulster Canal, including the development of the proposed Ulster Canal Greenway network, and the provision of a marina at an appropriate location within the town as it provides a vehicle for regeneration.

Submission No	Name/Organisation
87	Farney Community Development Group CLG

Summary of Submission & Issues Raised

- Carrickmacross Community Group request that the Council continue to support their efforts to return the 6-acre Carrickmacross Workhouse site, buildings and Mass Famine graves to public /community ownership.
- That the Council should support the efforts of the CLG Group to restore and redevelop the derelict Workhouse Building which is a Protected Structure
- The Mass Famine Graves should be that sites are preserved, as verified by the Geophysical and Archaeological Appraisal commissioned and funded by Carrickmacross – Castleblayney Municipal District
- It is requested that the current site zoning be retained as Community Services/Facilities to protect the Workhouse site, buildings and Mass Famine Graves

Chief Executive's Response

The comments received from Farney Development Group CLG are welcomed and noted. It is a strategic objective of the plan to protect and enhance existing community facilities and to co-operate with relevant stakeholders, whilst Policy CFP2 of the Draft Plan aims to assist and facilitate community groups to determine local projects to engage the community and to support them in any funding opportunities which may arise. The plan contains several policies which prioritise the protection, conservation and re-use of protected structures i.e. Policies BHP1-BHP9. Specifically, Policy BHP7 is supportive and flexible regarding the sympathetic re-use of protected structures where they are derelict or vacant. The area of lands this submission refers to (2.2ha's), is zoned as 'Community Facilities' in the draft Plan and no change to this is recommended.

Chief Executive's Recommendation

No amendments recommended.

Submission No	Name/Organisation
88	Joe Mc Meel

Summary of Submission & Issues Raised

- Submission recommends a relaxation of sight distances requirements on local roads. It is requested that Local Class 1 be reduced to 80m, Local Class 2 to 60m and Local Class 3 to 30m.
- This reduction is advocated on the basis that local rural dwellers are familiar with the roads and know when an entrance is approaching.
- The excessive removal of mature hedges and trees impacts on the environment.
- No evidence of accidents on local roads, even prior to strict control on new entrances being implemented.
- Road junctions are dangerous, and no action is being taken to address this.

Chief Executive's Response

The Development Plan is required to maximise road safety through clear policies on access to, and control of, development on or near public roads. Section 15.27.1 of the Draft Development Plan set out the visibility standards for new accesses and the intensification of existing accesses onto non-urban roads.

In consideration of this submission further consultation was made with the Road Section of Monaghan County Council who reviewed National Guidelines to consider whether there was scope to apply revised standards for the x and y distance on non-urban entrances. Further to this review it is recommend amending Table 15.5 contained in Chapter 15 Development Management Standards as illustrated in the recommendation below.

These revised requirements offer an acceptable pragmatic standard for the x distance at non-urban entrances. These requirements comply with National Standards (as per TII publications , DN-GEO-03060 & DNGEO-04031)

It should be noted that provision is also made in Section 15.27.1 of the Development Plan for the relaxation of required visibility standards in certain circumstances.

The improvement or upgrading of road junctions is the responsibility of the Roads Section of Monaghan County Council (except for National Roads). Consideration of the safety of existing junctions is outside the scope of the development plan process.

Chief Executive's Recommendation

Amend Table 15.5 of Chapter 15 : Minimum Visibility Standards for New Access or Intensification of an Existing Access onto non-urban roads as follows :

Road Category	Design Speed km/hr	'Y' distance (m)	'X' Setback distance (m)	Eye Height/Object height (m)
National	215	215	3.0	1.05
Regional (upgraded)*	150	160	3.0	1.05
Regional(not upgraded)	120	120	2.4	1.05
Local Class 1	90	90	2.4	1.05
Local Class 2	70	70	2.4	1.05
Local Class 3	50	50	2.4	1.05
Cul-de-sac	35	35	2.4	1.05

*Upgraded to TII standards- no upgraded Regional Roads in County at present

Submission No	Name/Organisation
89	Armagh City Banbridge & Craigavon Borough Council (ACB & CBC)

Summary of Submission & Issues Raised

- The submission states that the main issues of shared interest are Environmental Designations, Transportation and Sustainable Tourism.
- Welcomes Strategic Objective 3 which aims to improve linkages and communications between County Monaghan and neighbouring Councils and that the plan has a key aim to support and facilitate cross border co-operation and trade between Monaghan.
- Concurs with the approach taken to ensure that a collaborative and consistent policy approach is developed on matters of environmental and landscape protection and welcomes further discussion on this issue.
- Welcomes the recognition in the Draft Plan that the County's Green Infrastructure has a cross border dimension and therefore requires a co-ordinated approach.
- The policy to protect disused railway lines and to connect the main urban centres through central Ulster is consistent with the preferred approach of ACB & CBC.
- No objection to stated policy to work in concert with adjoining local authorities to extend and design new walking and cycling routes and concurs with the policy to support the re-opening of the Ulster Canal given its tourism potential.

Chief Executive's Response

Submission is welcomed and noted.

Chief Executive's Recommendation

No amendment recommended.

Submission No	Name/Organisation
90	Lough Bawn Trustees c/o TBP Planning & Development Consultants

Summary of Submission & Issues Raised

- According to Table 2.4 the rural areas of the county are expected to carry a large burden of new housing development and policy continues to encourage multi-units housing in dispersed locations which is unacceptable.
- To continue to allow one off housing without any form of needs test is unsustainable and if the council encourages people to live outside communities it must ensure the infrastructure is in place to support this development.
- The NPF makes it clear that the viability of small towns and villages needs to be considered in the development of rural housing policy and that the rural housing policy in the Draft Plan is premature pending a programme for housing in small towns and villages.
- Requests that additional criteria be included in Section 2.7.1 and that the Tier 6 communities are defined.
- Requests that the need to prepare a Water Protection Plan (Appendix 16) is applicable to all development including one off housing.
- Any new development in the rural area should be accompanied by a landscape and visual impact assessment, ecological impact assessment, biodiversity management plan, cultural and heritage impact assessment, tree survey, tree impact assessment and management plan, invasive species management plan, landscape plan and a desktop archaeological assessment.
- Request Lough Bawn House is referenced in Section 6.19.

Chief Executive's Response

It is widely recognised that County Monaghan is a rural county with much of its population residing in the rural area. The Core Strategy of the Development Plan sets out to achieve a more sustainable pattern of development by focusing more intense growth into the settlements whilst also supporting the rural population, which accords with the objectives of the NPF. The rural housing policy as set out accords with the guidelines for one off housing in the countryside and demographic analysis of the County indicates that there is no justification for introducing a 'local needs' policy across the entire rural area of County Monaghan. Furthermore, the rural settlement strategy recognises that the smaller established settlements have an important role in satisfying rural housing need and low density residential development is permissible in the Tier 5 and 6 settlements where criteria are set out. Section 2.3.11 sets out what a Tier 6 settlement is and given the nature and number of these

settlements within the County Monaghan landscape it is considered unnecessary to name or define them further. Past trends indicate that multi-unit residential development within these settlements will be limited and as such it is considered that the criteria as required by both Section 2.3.11 and 2.7 is sufficient to provide for their sustainable expansion whilst also protecting their rural character.

The requirement to submit a water protection plan is applicable to all developments and all applications for one-off housing are subjected to assessment under the EPA Code of Practice at the national level. This is deemed the appropriate mechanism for determining suitability of systems with respect to their impact on the environment. The additional assessments referred to in the submission are required in instances where developments may impact on sensitive sites and/or landscapes.

It is acknowledged that Lough Bawn should be included in the list of historic houses referred to in Section 6.19.

Chief Executive's Recommendation

1. **Include Lough Bawn in the list of Historic Houses in Section 6.19.**

Submission No	Name/Organisation
93	CS Pringle Consultants

Summary of Submission & Issues Raised

- The strategy for zoning lands over last two development plans needs to be revisited and considers that there is a better approach for zoning lands to select those which are serviced and those with no intention of developing should be removed.
- Lands on outer perimeter of towns which are serviced should be allowed to infill and lands that are shovel ready be encouraged to go. A similar approach should be applied in Tier 4 and 5 villages and not only those located in the centre of the settlements.
- The presence of undeveloped land parcels in settlements should not have a stagnating effect on the overall development of villages, these can add to the overall character of the settlement provided they are not derelict.
- CS Pringle have assessed sites in Tier 4 Villages and highlight sites which it is believed have potential for development into both single and multi-unit developments. An assessment of the sites within ten Tier 4 Villages shows potential for 16 single unit sites and 11 no multi-unit sites, most of the land will remain undeveloped due to lack of interest. *[please note submission refers to this assessment being outlined in the appendix; however, no appendix was received with the submission].*
- All minor road junctions off the N2 Motorway should have decelerating lanes leading into junctions with specific reference to Shercock Road Junction off the dual carriageway along Castleblayney Bypass.
- Confusion of motorists by 'two plus one' layout of bypass and it is recommended that additional legible signage indicating the length of the overtaking lane should be provided and signage in the central reserve to signal the end of overtaking lane.
- Submission refers to Policy RDP16 of the current plan which relates to construction of a dwelling within 100ms of an agricultural building and suggests that an alternative approach be considered whereby the applicant gives an affidavit, signed and sealed by a solicitor. If the applicant wants consent from the farmer to construct a dwelling, they should provide a letter stating they will not object to any future farm building provided general planning guidelines are adhered to.
- This policy should be relaxed in the case of Protected Structures and Heritage Buildings where their re-use would be beneficial.

- The word abandoned used in Policy RDP16 needs to be clearly defined by a clear set of rules which balance the rights of the property owner within the rights of the community. Different interpretations of abandonment have restricted development near such sites.
- The redevelopment of derelict sites in Rural Areas Under Strong Urban Influence should be encouraged and it is suggested that local needs restrictions should be relaxed for such sites since they are normally serviced with access, utilities, etc and have the benefit of mature landscaping. Such sites should be considered for development regardless of how long the use has been abandoned.
- Area Action Plan needed for Castleblayney to encompass lands stretching from Lakeview through the rear of Muckno Street and Lough Muckno Estate.
- The original entrance to Lough Muckno via the Coach Road should be redeveloped so that the amenity could be accessed from the N53 which would provide new opportunities for investment.
- It is recommended that a new Landscape Protection Area should be defined around Lough Muckno Park encompassing the Corracloghan Lakes along Crossmaglen Road from Frankford Bridge to Lough Ross basin. This would encourage linkages with counterparts in County Armagh thereby generating additional tourist potential.
- It is recommended that Mulandoy Graveyard should be designated as a Protected Structure.
- Additional sport facilities are needed for Castleblayney to meet demand. The plan should identify suitable lands to be zoned for community use for this purpose.
- Landscape Policy Areas have been used to block development on areas identified for future road proposals. Areas liable to flooding have been designated as Landscape Protection – such lands should be given a specific flooding designation.
- Queries how the plan will address the issue of Article 43 (Freedom of Movement of Local People) in relation to future local needs policy – recommends that this should be raised in a future Planning Forum meeting for discussion.
- Refers to Policy RDP14 in relation to the provision of domestic garages and recommends that it should be relaxed to allow for the construction of garages forward of the building line as courtyard type developments are a traditional part of rural Ireland.
- It is recommended that a new Design Guide be drafted in conjunction with the Agents Planning Forum. Design Guidelines contained in section 15.4 of the Draft Plan are too prescriptive/restrictive and will result in stifling design and generic house forms. No provision is made in the design guidelines for flat, mono pitch or curved roof styles which are a feature of contemporary design.

- Issue of sight distances needs to be revisited, sight line requirements result in significant stretches of mature trees and hedgerows being removed and it is suggested that a policy be introduced to prohibit the placing of posts on the edge of road margins.
- In relation to Table 9.3 Policy LZP1, which refers to the implementation of zoning objectives, it is requested that the requirement for the land to be in ownership of the landowner for 5 years be reduced to 3 years in instances where a single dwelling is to be provided on lands zoned as Strategic Residential Reserve.

Chief Executive's Response

Zoning of land has been carried out in accordance with the provisions of the Development Plan Guidelines issued by the DoEHLG 2007 and in accordance with the Core Strategy which sets out the Housing Land Requirement for the County over the Plan period. A sequential approach, as advocated in the Development Plan Guidelines, has been taken with regard to the land use zoning for lands within the settlements. The Core strategy prescribes for sustainable and co-ordinated growth within the villages which provides for a consolidated pattern of growth within the village envelopes.

Points raised in relation to Castleblayney bypass will form part of the online upgrade of the N2 project which is at preliminary design stage.

A recommendation to amend the policy of applying an occupancy clause restricting sale of a dwelling within 100m of an agricultural building has been made in consideration of submission No 24. Furthermore, Section 15.17.2 of the 2019-2025 Development Plan provides for increased flexibility of this policy for protected structures. It is considered unnecessary to define 'abandonment' and this is a matter which can be considered as part of the decision-making process.

Section 15.17.1 of the Draft Plan provides guidance and criteria on applications for replacing and restoration of dwellings. To revisit this policy specifically for areas under strong urban influence, as requested in this submission, is considered inappropriate as these types of structures exist throughout the County and should be considered individually on their merits.

It is a specific objective of the Castleblayney Settlement Plan to prepare and implement a Local Area Action Plan for lands to the rear of Muckno Street (CBO1). The existing landscape designations at Lough Muckno are sufficient to protect and expand on the existing amenity facilities. The Draft Plan includes extensive policies in relation to the promotion of Monaghan's tourism product which includes co-operation with other agencies and local authorities (TMP13& 14).

Given recent additions to the RPS following the NIAH survey, there are no proposals to update the Record of Protected Structures as part of this development plan review.

Community facilities and playing facilities are open to consideration within the majority of the land use zoning categories set out in the settlement plan and as such it is unnecessary to identify lands specifically for sports facilities.

Flood Risk is a specific zoning objective in the plan (11) and shown with a green outline on the Settlement Map. Landscape Protection Areas are normally either high exposed lands or provide flood attenuation.

In relation to the issue of Article 43, the Department of Housing, Planning, Community and Local Government issued Circular PL02/17 advising local authorities to continue to apply Rural Housing Policy in accordance with the Sustainable Rural Planning Guidelines 2005 until a review of the guidelines is completed in consultation with the local authorities and the European Commission. It is expected that a revised Circular and/or guideline will issue to local authorities when this process is complete.

Policy RD17 (b) of the draft Plan states that garage /stores /outbuilding should normally be to the side or rear of the dwelling and sited to minimise visual impact. A courtyard /cluster arrangement could be considered in certain innovative scheme proposals.

The design guidelines for one off housing set out in Chapter 15 are a new addition, following requests from both agents and applicants in relation to the development management process. It is considered that sufficient scope is provided for by way of the guidelines set out and that this will be a tool for all users in the future period. Innovative and energy efficient design are encouraged in the Draft Plan.

Public safety on local roads is of paramount importance to Monaghan County Council. Section 15.27.1 sets out the sight distance requirement for new accesses or the intensification of existing accesses onto non-urban roads including a relaxation of sight distances in certain instances. This is considered sufficient.

The request to reduce the length of time land must be owned to provide a one-off dwelling lands zoned 'Strategic Residential Reserve' is noted. It is considered that the five-year time frame is required to protect the future use of these lands use to prevent speculative development and protect the robustness of the Core Strategy.

Chief Executive's Recommendation

No amendment recommended.

Submission No	Name/Organisation
94	National Transport Authority

Summary of Submission & Issues Raised

- Supports the consolidation of economic and residential development in existing urban centres and the integration of land use and transport as set out in the Draft Plan.
- The National Transport Authority request that reference is made to two new bus routes introduced in 2017 by the NTA in association with Cavan-Monaghan Transport Co-ordination Unit to serve Monaghan Town.
- The services provided by the NTA are intended to fulfil a primarily social function in meeting the needs of communities outside defined settlements and requests that a policy be included in the plan to the effect that the Council will support the NTA in this regard.
- NTA recommends that the car parking standards set out in Table 15.9 should be stated as maximum requirement to assist in managing destination parking.
- Request that a specific policy be included in Section 7 requiring cycling infrastructure in urban areas to be designed in accordance with the NTA's National Cycling Manual and that Policy CW4 in Draft Plan be amended to include reference to a guidance document issued by Dun Laoghaire Rathdown County Council.
- The NTA recommends that the CDP contains policies and objectives which state that guidance stated in the NTA documents will be considered in development and transport planning.

Chief Executive's Response

The suggestions and comments in the submission are noted and welcomed as is the ongoing work of the NTA in conjunction with the CMTCU in providing public passenger land transport services in County Monaghan. The new routes have been established since the publication of the draft Plan and their inclusion is recommended as part of the response to Submission No 8 made by the CMTCU. It is considered that Policy PTP1 and PTP2 provides the necessary support for the Local Link Transport Programme.

Chief Executive's Recommendation

1. To insert in Section 7.3

The following guidance documents published by the National Transport Authority will be taken into account in the development and transport planning of the County;

- Permeability Best Practice Guide

- Achieving Effective Workplace Travel Plans; Guidance for Local Authorities
- Workplace Travel Plans: A guide for implementers
- Toolkit for School Travel
- Guidance Note on Area Based Transport Assessment (NTA & TII).

2. To insert in Section 7.17;

All cycling infrastructure in urban areas shall be designed in accordance with the National Transport Authorities National Cycle Manual (www.cyclemanual.ie). The provision of cycling parking and shelters should be designed having regard to the 'Standards for Cycle Parking and associated Cycling Facilities for New Developments' published by Dun Laoghaire-Rathdown County Council in 2018.

Monaghan Town

Submission No	Name/Organisation	Map Booklet Page No
4	Residents of Killyconnigan c/o Brian Finnegan	3

Summary of Submission & Issues Raised

- Submission requests that an undeveloped plot measuring 0.41 ha at Killyconnigan is rezoned as 'Residential' instead of 'Industry, Enterprise and Employment'.
- The lands have not been developed in 20 years and re-zoning for residential use will be beneficial to the area as it will enhance the quality of life for the residents by reducing the level of industrial traffic and noise pollution.

Chief Executive's Response

The subject lands are bounded by established industrial uses to the west and east. Although there are residential properties to the north and south of the site, the industrial access road to the south provides a buffer between the site and the adjoining residential development to the south, whilst the Ulster Canal provides a buffer between the site and the adjoining residential development to the north. It is considered that the introduction of housing on the subject lands could give rise to complaints from any future occupants given the location of the lands between two established industrial sites. Given the local context the proposed zoning of Industry, Enterprise and Employment is the most appropriate zoning for this site.

Chief Executive's Recommendation

No amendment recommended.

Submission No	Name/Organisation	Map Booklet Page No
25	Gerard Clerkin	4

Summary of Submission & Issues Raised

- Request that the lands measuring 4.85 ha at Mullaghadun and Gallanagh in Monaghan town are zoned as 'residential' instead of 'residential reserve'.
- They are currently serviced by street lighting, footpaths and inside of the town speed limit of 50kmph.

Chief Executive's Response

Whilst it is acknowledged that the lands have some services available to them and they are located within the Monaghan town speed limit, the lands proposed to be zoned as Proposed Residential A and B in the draft plan are considered sequentially more appropriate for residential development during this Plan period. In addition, there is no storm sewerage collection network serving this area, and the foul sewerage collection network at this location does not extend as far as the subject lands and only has capacity for the existing development along the Scotstown Road. As such the most appropriate land use zoning for these lands is Strategic Residential Reserve.

Chief Executive's Recommendation

No amendment recommended.

Submission No	Name/Organisation	Map Booklet Page No
30	Vincent Mallon	5

Summary of Submission & Issues Raised

- The submission requests that a plot of land (1.95 ha) at Mullaghadun be considered for zoning as low density/serviced sites.
- The site is proximate to Monaghan town and is situated adjacent to an established residential development and there is a demand for development of services sites in this location

Chief Executive's Response

The lands proposed to be zoned as 'Proposed Residential 'A' and 'B' in the draft plan are considered sequentially more appropriate for residential development during this plan period. In addition, there is no storm sewerage collection network serving this area, and the foul sewerage collection network at this location only has capacity for the existing development along the Scotstown Road. As such the most appropriate land use zoning for these lands is 'Strategic Residential Reserve'.

Chief Executive's Recommendation

No amendment recommended.

Submission No	Name/Organisation	Map Booklet Page No
32	Patrick Ruxton	6

Summary of Submission & Issues Raised

- Requests entire land parcel of 2.71 ha at Kilnacloy is zoned as high density residential.
- Entire site is closer to the town centre than other sites zoned 'Residential A' and there is potential to provide quality social housing on the site, is within walking distance of all public amenities and facilities of Monaghan Town and will prevent urban sprawl.
- Proposes that 40 units could be provided on the site, backed by a principle investor and would be developed without delay.
- Services about the site including footpath and public lighting and it is near main transport routes and walking distance of the bus depot.

Chief Executive's Response

The lands are currently zoned as part 'Proposed Residential B' and part 'Landscape Protection/Conservation' in the Draft Plan. The lands at the rear of the land parcel are topographically challenging, falling steeply to the north to a flood plain area along the banks of the Blackwater River. Furthermore, part of this site includes a historical burial ground known as 'Mousewood Graveyard'. This graveyard was associated with the former union workhouse building and zoning of this plot for residential is considered inappropriate. Taking into account these factors and potential existing access constraints, the zoning of this portion of lands as 'Landscape Protection/Conservation' is considered the most appropriate. Although the lands proposed as 'Residential A' are located in close proximity to the Town Centre, are reasonably well serviced and are adjacent to higher density housing comprising Belgium Park and along Rope Walk, it is considered appropriate that the subject lands be zoned as 'Residential B' to ensure a reasonable distribution of low density/serviced sites opportunities around the town.

It should be noted that the availability of resources to complete a development is not a consideration when determining the appropriate zoning for a site/land parcel.

Chief Executive's Recommendation

No amendment recommended.

Submission No	Name/Organisation	Map Booklet Page No
39	Moffett Investment Holdings c/o McGuigan Architects	7

Summary of Submission & Issues Raised

- Requests that all of the lands (33.89 ha) at Kilnacloy are zoned for residential development and/or serviced sites. Part of the site is Proposed 'Residential A' and part 'Strategic Residential Reserve' with the remaining part zoned as 'Landscape Protection/Conservation'.
- Site is currently in agricultural use and is predominantly bounded by residential dwellings of various styles with some commercial premises adjacent. Given its setting and location consider that the lands are suitable for residential development.
- Developer in possession of these lands has the necessary resources to proceed with development of part/all of the lands.

Chief Executive's Response

It is requested to zone the lands proposed as 'Strategic Residential Reserve' and the lands proposed as Landscape Protection/Conservation all to Proposed Residential. This latter portion of lands are either located within a flood risk area or have topographical challenges. This land is visually detached from the built-up fabric of the town and acts as an important landscape feature due to its elevated nature, which contributes to the landscape setting of the town.

Whilst the portion of land zoned 'Strategic Residential Reserve' may represent a sequential development of the town, the extent of greenfield lands available for residential development in more sequentially appropriate locations within Monaghan town are sufficient to meet the projected population increase over the plan period.

It should be noted that the availability of resources to complete a development is not a consideration when determining the appropriate zoning.

Chief Executive's Recommendation

No amendment recommended.

Submission No	Name/Organisation	Map Booklet Page No
40	Eamon Coyle c/o McGuigan Architects	8

Summary of Submission & Issues Raised

- Requests the lands measuring 0.71 ha along the Scotstown Road is zoned for residential as opposed to 'Existing Residential' and 'Landscape Protection/Conservation'.
- Site is currently in use as a bungalow dwelling and additional outbuildings.

Chief Executive's Response

As there is an existing dwelling on site the lands are accordingly zoned as 'Existing Residential'. The land use zoning of 'Existing Residential' does not preclude residential development on the lands subject to compliance with other policies set out in the development plan in respect of character of the surrounding area, density etc.

The portion to land to the rear of the dwelling is within a flood risk area where an open drain traverses. Due to this flood risk it is appropriate to zone this portion as 'Landscape Protection/Conservation'.

Chief Executive's Recommendation

No amendment recommended.

Submission No	Name/Organisation	Map Booklet Page No
41	David Patton c/o McGuigan Architects	9

Summary of Submission & Issues Raised

- Requests that the lands measuring 8.60 ha at Tully are zoned for 'Proposed Residential B' instead of 'Strategic Residential Reserve'.
- Site is currently in agricultural use with access from Mullaghmatt and is bounded on three sides by residential developments ranging in density.
- Developer has the necessary resources to proceed with development of part/all the lands.

Chief Executive's Response

These lands are topographically challenging and whilst this portion of land would be considered reasonably sequential, the extent of more topographically suitable greenfield lands available for residential development within Monaghan town are sufficient to meet the projected population increase over the plan period. In addition, access to these lands via Mullaghmatt is restricted and the development of these lands is likely to be reliant upon the development of the link road proposed to the immediate south of the lands.

It should be noted that the availability of resources to complete a development is not a consideration when determining the appropriate zoning for a site/land parcel.

Chief Executive's Recommendation

No amendment recommended.

Submission No	Name/Organisation	Map Booklet Page No
42	Francis McGuigan c/o McGuigan Architects	10

Summary of Submission & Issues Raised

- Requests the lands measuring 1.52ha at Newgrove/Cornecassa are zoned as 'Industry/Enterprise/Employment' instead of 'Landscape Protection/Conservation'.
- Eight industrial/retail warehousing units were erected in 2005/2006 on the adjoining lands and all the necessary services are in place. Permission was granted on these lands for six more units under Pl. Ref 06/379 but due to the economic crash they were never built.
- The current units are fully occupied, and the rezoning of lands would afford the opportunity to form a high-quality industrial environment within the Monaghan settlement limit.
- Developer has the necessary resources to proceed with development of part/part/all the lands.

Chief Executive's Response

This portion of land is within a flood risk area and as such is zoned as 'Landscape Protection/Conservation' which is considered the most appropriate land use zoning.

It should be noted that the availability of resources to complete a development is not a consideration when determining the appropriate zoning for a site/land parcel.

Chief Executive's Recommendation

No amendment recommended.

Submission No	Name/Organisation	Map Book Page No
43	Francis McGuigan c/o McGuigan Architects	11

Summary of Submission & Issues Raised

- Requests the lands measuring 2.2 ha at Drumbear which are located outside of the settlement envelope are zoned as proposed residential.
- Consider these lands better placed than a number of sites in close proximity which are currently zoned.
- Developer has the necessary resources to proceed with development of part/all of the lands.

Chief Executive's Response

There are sufficient lands located within the settlement envelope suitable for residential development in more sequentially appropriate locations to meet the projected population increase over the plan period. However, it is considered that having regard to the location of the subject lands immediately adjacent to a large residential area, the availability of services and the limited supply of zoned 'Strategic Residential Reserve' lands at this location, it is appropriate to zone the lands as 'Strategic Residential Reserve'.

It should be noted that the availability of resources to complete a development is not a consideration when determining the appropriate zoning for a site/land parcel.

Chief Executive's Recommendation

It is recommended to include the subject lands (2.2 ha) within the settlement envelope and to zone the lands as Strategic Residential Reserve

Submission No	Name/Organisation	Map Booklet Page No
46	IJM Engineering Ltd c/o Mc Guigan Architects	12

Summary of Submission & Issues Raised

- Requests that a plot of land measuring 2.18 ha at Tully lying between established residential developments Tully and Manor Wood, be considered for 'Proposed Residential A' or 'Proposed Residential B' instead of 'Strategic Residential Reserve'.
- The site is located 400m from the town centre and access is available from the Glen Road.
- A previous permission was refused on this site due to access issues and prematurity /deficiency in public sewerage infrastructure, but these issues have been resolved. Access can now be obtained directly from Glen Road (access formerly proposed via Manor Wood) and public sewerage infrastructure provided under planning reference 16/376 by Irish Water.
- The proposal to provide units on this site would facilitate walking and cycling, the site is located along a public transport route and the provision of residential development on this site will support the employment and shopping function of the town.
- Topography of the site is favourable for development and is not located within a designated Flood Risk Area.
- The location would comply with the proposed Core Strategy Policy CSP1 and Policy HSP5 which promotes the sequential development of the town and the site is in closer proximity to the town than other sites identified on map MDP1 for Proposed Residential.
- The landowner possesses the required resources to deliver residential development on these lands.

Chief Executive's Response

The location of these lands is considered sequential to Monaghan town centre. The lands are located in between two residential developments and would contribute to the consolidation of the town close to its centre. Furthermore, the site offers potential to deliver a quality sustainable pattern of development with town centre facilities, schools and amenities all within walking distance of the site. It should be noted that the availability of resources to complete a development is not a consideration when determining the appropriate zoning for a site/land parcel.

Chief Executive's Recommendation

It is recommended to zone the subject lands (2.18 ha) at Tully as Proposed Residential A and rezone lands to facilitate this as set out in the Core Strategy Summary on page 108.

Submission No	Name/Organisation	Map Booklet Page No
47	Brian & Delia Finnegan	13

Summary of Submission & Issues Raised

- The submission requests that a plot of land measuring 0.1 ha in Killyconnigan be amended from 'Industry, Enterprise and Employment' zoning to 'Proposed Residential' zoning.
- This would be beneficial to established residents of Killyconnigan and would reduce the level of industrial traffic and noise pollution.

Chief Executive's Response

The area of land currently consists of undeveloped land adjacent to the access/service road for Killyconnigan Industrial Estate. Lands to the south and east comprise detached single storey and dormer properties in a residential area known as Killyconnigan. Lands to the north are zoned for 'Industry and Employment'. Given the pattern of development locally the subject site could be considered suitable for residential development.

Chief Executive's Recommendation

It is recommended to zone the subject lands (0.1 ha) as 'Proposed Residential B' and rezone lands to facilitate this as set out in the Core Strategy Summary on page 108.

Submission No	Name/Organisation	Map Booklet Page No
54	Sean McKenna	N/A

Summary of Submission & Issues Raised

- Seeks the removal of the Local Area Action Plan for the North East of Dublin Street referenced on p.212 of the Draft Development Plan as it has been a prohibitive instrument over two decades curtailing development and any medium to long term business plan.

Chief Executive's Response

This LAAP was adopted in March 2011 as a tool to aid the comprehensive development of a strategic and significant land parcel along and to the rear of Dublin Street in Monaghan town. Its purpose is to provide a long-term framework and to stimulate a plan led redevelopment of the back lands. It is acknowledged that no development has taken place on these lands since the adoption of the plan, however the economic circumstances over this period were an extenuating factor. Ultimately the objectives of this action plan remain relevant for these lands and it is hoped that during increased economic activity over the 2019 Plan period that the development of these lands, as anticipated by this area action plan, will encourage the development of the area in a comprehensive and planned fashion thereby avoiding any piecemeal approach to each individual plot area. The inclusion of these lands within the LAAP boundary does not prohibit future development of the site subject to appropriate consideration and compliance with LAAP objectives. It should also be noted that the Local Area Action Plan for the North East of Dublin Street is included in Monaghan's application for the Urban Regeneration Fund and to remove this LAAP from the development plan could prejudice potential project funding .

Chief Executive's Recommendation

No amendment recommended.

Submission No	Name/Organisation	Map Booklet Page No
55	Francis McGuigan c/o McGuigan Architects	14

Summary of Submission & Issues Raised

- Requests all of the lands measuring 1.17 ha at Telaydan remain as 'Proposed Residential' with construction commencing over the coming months.

Chief Executive's Response

The lands are immediately contiguous to an existing housing development, have been cleared, have the benefit of planning permission and thus no change to this zoning is being proposed.

Chief Executive's Recommendation

No amendment recommended.

Submission No	Name/Organisation	Map Booklet Page No
56	Killian Coyle c/o Hughes Planning & Development Consultants	15, 16 & 17

Summary of Submission & Issues Raised

- The submission relates to lands at the Plantation, which are referred to in the submission as A, B & C.
- Requests that all the lands are zoned as 'Town Centre'.
- Site A comprises one detached dwelling, that has two vehicular entrances and is abutted by town centre zoning. Plots A, B & C are in a prominent location allowing for the organic growth of the town centre, enhancing the overall attractiveness of the town as a retail destination as well as providing for the redevelopment of under-utilised brownfield sites.
- Rezoning Site A from 'Existing Residential' to 'Town Centre' would serve to expand the town centre, complement the adjacent land use zoning and provide greater potential for development.
- Submission supports the introduction of Policy CP5 which facilitates the reduction of car parking for development or redevelopment of infill/brownfield/derelict sites within the designated town centres.
- Requests an amendment to Table 15.9 of the development plan, to consider the car parking requirement for retail development based on net floor area rather than gross floor area.

Chief Executive's Response

Area of lands requested to be zoned as 'Town Centre' instead of 'Existing Residential' in the Monaghan settlement plan is 0.16 ha. The extension of the 'Town centre' zoning onto this land parcel is considered appropriate given its location within a mixed-use zoning where there is potential to redevelop a large brownfield site in a strategic location to the north of Monaghan town. The car parking standards, as set out in the draft Plan, are considered appropriate for the towns located within County Monaghan, particularly when compared with other similar settlements in adjoining counties. Furthermore, Policy CP5 and CP6 of the Plan provides flexibility of standards at town centre sites if required.

Chief Executive's Recommendation

It is recommended to zone the subject lands marked 'A' to 'Town Centre'.

Submission No	Name/Organisation	Map Booklet Page No
57	Tommy Martin c/o Mc Guigan Architects	18

Summary of Submission & Issues Raised

- Requests plot of land measuring 1.30 ha at Mullaghmonaghan is zoned for 'Residential' instead of 'Landscape Protection/Conservation'.
- The site is within 500m of Monaghan Town Centre and is fully serviced. There is an extensive planning history associated with site as provided, and the site contains the foundations and substructure of previously permitted apartment block.
- Submission states that the landowner has the necessary resources for the development of this site.
- Site provides possibility for the most efficient use of unfinished lands and are better placed for residential development over several sites zoned further from the town centre.

Chief Executive's Response

The availability of services and proximity to town centre of this site is acknowledged. However, these lands are zoned as 'Landscape Protection/Conservation' due to flood risk. Notwithstanding this, they also have the potential to provide a quality area of public open space for adjoining residents.

It should be noted that the availability of resources to complete a development is not a consideration when determining the appropriate zoning for a site/land parcel.

Chief Executive's Recommendation

No amendment recommended.

Submission No	Name/Organisation	Map Booklet Page No
63	Cumann Luthchleas Gael Mhuineachain c/o Kenneth D. Lonergan & Associates Ltd	19

Summary of Submission & Issues Raised

- Requests that the lands (2.18 ha) at Cornacassa Demense, Scotstown Rd be zoned as 'Residential' instead of 'Recreation/Amenity'.
- The plot was previously a football club, but this use has been abandoned and is surrounded by zoned residential lands.
- The plot is serviced, accessible and adjacent to schools, recreational facilities, shopping and social structures and no recognition of the existing services have been assessed as a suitable site for inclusion.
- It will offer suitable residential development on approach to the town and existing planting will screen any development visually with low density development matching existing development on adjacent lands.

Chief Executive's Response

The extent of greenfield lands available for residential development within Monaghan town in more sequentially appropriate locations are sufficient to meet the projected population increase over the plan period. In addition, there is no storm sewerage collection network serving this area, and the foul sewerage collection network at this location does not extend as far as the subject lands and only has capacity for the existing development along the Scotstown Road. A portion of the lands are at risk of flooding. Given that the lands are bounded on three sides by Existing Residential development and on the remaining side by 'Strategic Residential Reserve', there are merits in zoning the lands for residential use. However, having regard to the issues in respect of servicing the most appropriate land use zoning for these lands is 'Strategic Residential Reserve'.

Chief Executive's Recommendation

It is recommended to zone the lands as 'Strategic Residential Reserve'.

Submission No	Name/Organisation	Map Booklet Page No
69	Mr Leslie & Mrs Kanokphorn Crawford	20

Summary of Submission & Issues Raised

- Requests that the lands measuring 0.79 ha outlined on attached map at Old Armagh Road be zoned as 'Proposed Residential 'A' or 'B'.
- Due to their location, there is potential to connect to existing services and to access main transport routes, and it is better placed than a number of sites currently zoned residential.

Chief Executive's Response

The land referred to in this submission comprises two fields including an existing house and outbuildings. It is considered more appropriate that the existing house and outbuildings be zoned 'Existing Residential'. The remaining lands may offer the opportunity to provide access to the large tract of zoned 'Industry, Enterprise and Employment' to the immediate north of these lands and thus should be retained as zoned i.e. 'Industry, Enterprise and Employment'.

Chief Executive's Recommendation

It is recommended to zone the existing house and outbuildings as 'Existing Residential'.

Submission No	Name/Organisation	Map Booklet Page No
71	Quest II Fund 900104 c/o FJ Coyle & Associates	21

Summary of Submission & Issues Raised

- Requests that the lands measuring 3.76 ha at Cornecassa Demense be zoned as 'Proposed Residential' instead of 'Strategic Residential Reserve'.
- Submission should be read in conjunction with Submission No. 72 for land at Cortolvin (0.88ha) for which a request is made to 'dezone'.
- Permission previously granted in 2008 for 30 detached units on these lands. Site is located adjacent to public roads, within walking distance of Monaghan town and does not represent urban sprawl. Discussions have been had with Local Authority staff regarding these lands and there is a recognised need for serviced sites at suburban locations.
- The Plan should place greater emphasis on zoning lands in existing urban areas and greater restrictions on single rural housing as required by the Regional Planning Guidelines and National Planning Framework.
- Population growth of 1.04% is too conservative and should be revised to at least 1.6% given the improved economic conditions, and consequently the amount of lands zoned for 'Proposed Residential' as set out do not provide adequate lands for future population growth.
- Population projections set out in the core strategy falls short of what is envisaged by the RPGs and the core strategy should encourage at least 40% of future population growth and housing requirements in the urban areas.
- 'Strategic Residential Reserve' should be omitted from the core strategy and serviced sites should be considered as an alternative to facilitate an alternative to rural housing.
- Suggests County population growth should be 70,813 by 2025 and 49.27 of lands should be zoned for housing in Monaghan Town based on an average density of 16.5 units per hectare.

Chief Executive's Response

The extent of greenfield lands available for residential development within Monaghan in more sequentially appropriate locations are sufficient to meet the projected population increase over the plan period, notwithstanding the increase in lands zoned for industry and employment uses. In addition, there is no storm sewerage collection network serving this area, and the foul sewerage collection network at this location does not extend as far as the subject lands and only has capacity for the existing development along the Scotstown Road.

The projected growth as set out in the Core Strategy is considered reasonable in the context of the population analysis and patterns of residential development which have occurred in both County Monaghan over the previous plan periods as well as compliance with the requirements as set out by the National Planning Framework. Furthermore, the population projections as set out in the Plan are in accordance with those prescribed by the 'Implementation Roadmap for the National Planning Framework' published in July 2018.

Any lands zoned as 'Strategic Residential Reserve' are done so by reason of their location in the context of the wider settlement area which is required to ensure that sufficient lands in suitable locations are reserved to provide for the sustainable expansion of the settlements in the future. To permit serviced sites within these lands would be contrary to the provisions of the Core Strategy and has the potential to dissolve the development potential of these lands in a piecemeal fashion which would be considered contrary to proper planning and sustainable development.

Chief Executive's Recommendation

No amendment recommended.

Submission No	Name/Organisation	Map Booklet Page No
72	Barry Aughey, c/o FJ Coyle & Associates	22

Summary of Submission & Issues Raised

- Requests that the lands (0.87 ha) at Cortolvin be zoned as 'Landscape Protection/Conservation' instead of 'Proposed Residential B'.
- The owner resides immediately adjacent to the lands and utilises the lands as an ancillary 'curtilage area' associated with the dwelling and will not be developing the lands identified for any residential purposes.
- The lands are steep, have no direct access, are located alongside the Ulster Canal and Tom Young's Wood, and suggests a policy is included alongside MPO10 for the protection of Tom Young's Wood.
- Submit that lands under the same ownership at Cornecassa can compensate for these lands at Cortolvin not being available for residential development (Submission No 71).

Chief Executive's Response

It is accepted that these lands are in private use by the landowner as additional curtilage area associated with the adjoining dwelling. As such there is no objection to the land use zoning amendment.

Chief Executive's Recommendation

It is recommended to zone the subject lands (0.87 ha) as 'Landscape Protection/Conservation'.

Submission No	Name/Organisation	Map Booklet Page No
73	Mon Commercial Holdings, c/o FJ Coyle & Associates	23

Summary of Submission & Issues Raised (*Same land parcel as submission no 82*)

- Requests that the lands of 1.16 ha at Coolshannagh be zoned as 'Industry, Enterprise & Employment' for the entirety of the client's folio.
- The 2013-2019 Development Plan zoned the lands as 'Existing Commercial' recognising the serviced status of the lands with access available to the public road.
- The lands are not of any landscape and amenity benefit to the town, have no ecological habitat of note and there are no defining characteristics to merit different zonings between the subject lands.
- Sub-dividing the land between zonings renders a portion of the lands unviable for development given the plot width restrictions.

Chief Executive's Response

A portion of the land is within a flood risk area which has been determined using OPW flood survey maps, OSI contour maps and an on the ground survey. As such 'Landscape Protection/ Conservation' is considered the most appropriate land use zoning. It is considered that as there is no existing commercial use on the remainder of the lands the appropriate zoning is Industry, Enterprise and Employment.

Chief Executive's Recommendation

No amendment recommended.

Submission No	Name/Organisation	Map Booklet Page No
82	The Maxol Group c/o Tom Phillips & Associates	24

Summary of Submission & Issues Raised (*same land parcel as submission no 73*)

- Requests that the lands measuring 2.88ha outlined on attached map at Coolshannagh be zoned as 'Industry, Enterprise and Employment' instead of partially 'Landscape Protection/Conservation'.
- Zoning should be refined to reflect existing ground levels and assessed flood risk, thereby increasing the 'Industry/Enterprise/Employment' zoning and facilitating the development of the lands for commercial uses.
- The new zoning of 'Landscape Protection/Conservation' is due to the lands being identified as being at risk of flooding however the zoning extends over a greater area and unnecessarily restricts development potential on these lands.
- This amendment will facilitate the comprehensive future redevelopment of these serviced and accessible lands whilst maintaining a physical and visual buffer between the existing and proposed development and the Ulster Canal Greenway.

Chief Executive's Response

This portion of land is within a flood risk area which has been determined using OPW flood survey maps, OSI contour maps and an on the ground survey, and as such 'Landscape Protection/Conservation' is considered the most appropriate land use zoning.

Chief Executive's Recommendation

No amendment recommended.

Submission No	Name/Organisation	Map Booklet Page No
86	Marian Logue	25

Summary of Submission & Issues Raised

- Refers to Willville House, Aghananimy, Monaghan which is protected structure and of architectural and historical importance, and requests adjoining lands are zoned as 'Landscape Protection & Conservation' instead of 'Strategic Residential Reserve'.
- Adjoining lands are zoned as 'Strategic Residential Reserve' and would have the greatest injurious environmental impact on the house and its surroundings.
- Query if a conservation architect has been consulted or an environmental impact assessment has been carried out to establish if any proposals to build on the adjoining land would impact on the natural environment.
- This zoning will have maximum injurious impact on the house as regards view, aspect and privacy and are lands which formed part of Willville House and are part of the character of the house.

Chief Executive's Response

Submission refers to protected structure RPS Ref 41400931. It is acknowledged that the most suitable land use zoning for this property and its curtilage is 'Existing Residential'. The plot of land associated with the curtilage of the dwelling is 1.01ha. It is not considered that the zoning of adjoining lands as 'Strategic Residential Reserve' will negatively impact on the conservation of the protected structure. Any development proposals on these lands will be required to comply with Policy BHP6 which requires new developments to be sympathetic with and complement the structure and its setting.

Chief Executive's Recommendation

It is recommended to amend the land use zoning for the protected structure (Ref 41400931) and its curtilage from 'Strategic Residential Reserve' to 'Existing Residential'.

Submission No	Name/Organisation	Map Booklet Page No
91	The Real Meals Company & Arthur Mallon Foods c/o McMahon & Associates	26

Summary of Submission & Issues Raised

- Requests that the lands measuring 0.81 ha at Knockaconny, where a substantial portion of the lands have been zoned as 'Landscape Protection/Conservation', revert back to 'Industry/Enterprise/Employment'.
- Revised zoning will not promote growth and expansion and will have a huge effect on the viability of the site and its ability to grow as a business.
- There is no history of flooding at this site and there are no important features which require protection, and thus considers the zoning on these lands as unwarranted and contrary to the development plan which seeks to facilitate the expansion of existing industries.

Chief Executive's Response

The submission refers to lands located within a flood risk area along the banks of the Blackwater River. Notwithstanding the existing commercial activity at the adjoining site, the lands are located on the periphery of Monaghan town and are also considered to be at risk of flooding. There is also access constraints due to the location of the access on a national road outside of the town speed limits and in the general speed limit area. Consequently, the most appropriate land use designation is Landscape Protection/Conservation.

Chief Executive's Recommendation

No amendment recommended.

Submission No	Name/Organisation	Map Booklet Page No
92	Arthur Mallon Foods c/o McMahon & Associates	27

Summary of Submission & Issues Raised

- Encouraged to see the majority of the site zoned as 'Industry, Enterprise and Employment' but the 'Recreation and Amenity' zoning will have a detrimental effect on the viability of the site and its ability to grow as a business.
- Considers this to be an incompatible zoning for this area given there is an existing industry on site with extensive and imminent plans to develop and expand the business at this location.
- An area around the perimeter of the site zoned as passive active recreation is a threat to the functionality of the current and future enterprise.
- The planning application which was considered through material contravention process is the basis on which Arthur Mallon Foods are investing in the site, and a 'Landscape Buffer Zone' to compensate for the loss of the landscape zone through the centre of the site has been denoted.
- Requests the Landscape Protection/Conservation zoning is retained for the lands on the perimeter of the site.

Chief Executive's Response

This submission refers to lands totalling 10.56 ha which traverse the old Great Northern Railway (GNR) line at Mullaghadun. The 2013 Development Plan protected the route of the old railway line from unsuitable development throughout Monaghan town by zoning it 'Landscape Protection/Conservation'. Notwithstanding this zoning, the operations of Mallon Foods were granted planning permission by way of a material contravention to enable an expansion of the facility at this site onto the lands zoned as 'Landscape Protection/Conservation'. It is therefore recognised that the route of the GNR line at the point where it meets the Mallon lands cannot be protected. However, it remains an objective of the Plan to develop alternative transport modes including cycle paths and walkways using disused infrastructure such as the Ulster Canal and the GNR. As such, it is considered that the area should be retained as 'Recreation and Amenity' around the industrial lands to facilitate the development of a greenway along the route of the GNR by diverting it around the existing and proposed food production operations. It is further noted that the route traverses undulating topography and that the area zoned 'Recreation and Amenity' should remain as such to ensure that appropriate gradients to facilitate a walking and cycling route are retained.

Chief Executives Recommendation

No amendment recommended.

Core Strategy Summary - Monaghan Town

The Housing Land Requirement (HLR) for Monaghan Town is 44.1 ha. As a result of the submissions received a number of zoning changes are recommended in Monaghan Town which have implications for the Core Strategy Figures as expressed in Chapter 3 of the Draft Monaghan County Development Plan 2019-2025.

The left hand column of the table below shows the lands/submission to be zoned residential in accordance with the Chief Executive's recommendation while the right hand column shows lands removed from residential zoning to accommodate the changes in the left hand column.

The Chief Executive's report recommends that the zoning of the lands at Tully (Submission No 46) change from 'Strategic Residential Reserve' to 'Residential A'. In addition, it is proposed to change the zoning of a site at Killyconnigan (Submission No 47) from 'Industry, Enterprise and Employment' to 'Proposed Residential B'. In order to ensure compliance with the Core Strategy, it will be required to change the zoning of lands zoned 'Proposed Residential' to ensure the HLR is not exceeded.

Submission No 72 requested the lands be rezoned from 'Proposed Residential B' to 'Landscape Protection and Conservation', this amendment provides an additional 0.87 ha of residential zoned land which can be allocated elsewhere.

In order to address Submission No 75 from the Department of Education and Skills seeking the selection of a school site it is recommended that an additional 1 ha of land be zoned for 'Proposed Residential A' which would also facilitate the development of a school. It is deemed reasonable to take this approach on the basis that schools generally tend to be located close to residential areas.

In order to accommodate the Chief Executive's recommendations for submission 46 and 47, the report recommends changing the zoning for site No 25 in the Draft Plan from 'Proposed Residential B' to 'Strategic Residential Reserve'. In assessing a suitable site for rezoning, consideration was originally given to Site No 26 which was the most peripheral site within the settlement envelope. However, in conclusion it was determined that the adjacent site No 25 is more topographically challenging and situated immediately adjacent to an ESB substation and is therefore less suitable for residential development than Site 26.

Taken together the additional 1 ha of zoned lands to accommodate a future school site, the rezoning of Site 72 from 'Residential B' to 'Landscape Policy and Protection' and the rezoning of site 25 in Draft Plan from Residential B to 'Strategic Residential Reserve' provides sufficient lands to facilitate the recommendations for Submissions No 46 and No 41 (see page 28 of map booklet).

Submission No	+	Submission No /Site No Draft Plan	-
46 (Tully)	2.18 ha	72 (Cortolvin)	0.87 ha
47(Killyconnigan)	0.10 ha	Site 25 of Draft Plan (Drumbear)	0.50 ha
			1.37 ha
		75 (=+1ha for school)	1.00 ha
Total	2.28 ha		2.37 ha
		Overall Change	+0.01 ha

Carrickmacross

Submission No	Name/Organisation	Map Booklet Page No
3	Patrician High School c/o Patrick J Duffy	31

Summary of Submission & Issues Raised

- Patrician High School is currently in the process of purchasing a plot of land (4.11 ha) at Cloghvally Upper, proximate to the existing school complex with a view to relocating the PE Department there, thereby facilitating additional classroom and other facilities on the main school complex.
- The submission requests that the lands identified on the submitted map /site layout plan be zoned for 'Community/Recreational' use (current zoning 'Strategic Residential Reserve').

Chief Executive's Response

The subject lands are located approximately 150m southeast of the main school complex. Whilst there are issues in relation to access, having regard to the limited area at the school and the location of these lands within walking distance of the school, it is considered appropriate to provide for recreational facilities on these lands.

Chief Executive's Recommendation

It is recommended to zone the subject lands (4.11 ha) as 'Community Services/Facilities'.

Submission No	Name/Organisation	Map Booklet Page No
31	P Rogers & Sons Ltd c/o Finnegan & Jackson	32

Summary of Submission & Issues Raised

- The submission requests that a plot of land (4.12 ha) located at Derryolam be included within the settlement envelope for Carrickmacross and zoned for residential development.
- Lands were previously zoned for residential use and have a planning history for housing development on this site between 1982-1997 and 16 houses constructed as Part of phase 1 adjacent to the subject lands.
- It is intended to construct a new housing development on these lands should the residential zoning of the site be recommended.
- The subject lands are 800m from the town centre, are better suited for zoning than other lands located on the periphery and references sites 2, 3, 4 and 15 which are a further distance from the town core.
- Submission refers to the protected route of the proposed inner relief road west of Carrickmacross and submits that the location of the proposed road is unsuitable for engineering, environmental, economic and aesthetic reasons and would restrict the future expansion of the town and the road would form a natural boundary for zoning resulting in an imbalance in the sequential growth of the town.
- The topography of the proposed route consists of elevated drumlins and is located in close proximity to a Protected Structure.
- An alternative road further west of the existing route location is suggested as a less restrictive route that works with the natural contours of the land.

Chief Executive's Response

Although the lands are sequentially well located, there are sufficient lands located within the existing settlement footprint suitable for residential development in more appropriate locations to meet the projected population increase over the plan period.

The road proposal adjacent to these lands has not been progressed to detailed design study and is only an indicative route at this stage. To zone lands in close proximity to any proposed route would be premature pending the final determination of a road layout in this vicinity.

Chief Executive's Recommendation

No amendment recommended.

Submission No	Name/Organisation	Map Booklet Page No
34	John Paul Kierans c/o Finnegan & Jackson	33

Summary of Submission & Issues Raised

- Requests that a plot of land (3.08 ha) located at Lurgans be zoned for 'Proposed Residential A'.
- The site was previously zoned as 'High Density Residential' in the Monaghan County Development Plan 2007-2013, and Phase 1 of the lands were developed during that period.
- Services are installed on the site to facilitate Phase 2 and the zoning of these lands would be a natural progression of the town.
- The site is in close proximity to an established residential area and amenities such as footpath and public lighting are in place.
- The contours of the site are more suitable for development than some of the proposed residential zonings in the Draft Plan which have very steep gradients resulting in significant levels of excavation and provision of embankments to accommodate development.
- There is interest in the site from developers wishing to purchase due to its desirable features.

Chief Executive's Response

Whilst it is acknowledged that the subject lands are serviceable and proximate to existing amenities, they are located outside of the settlement envelope and there is restricted width along the public road which will give rise to constraints for increased traffic capacity and footpath provision to serve these lands. Furthermore, there are sufficient lands located within the existing settlement envelope to meet the projected population increase over the plan period.

It should be noted that the availability of resources to complete a development is not a consideration when determining appropriate zonings.

Chief Executive's Recommendation

No amendment recommended.

Submission No	Name/Organisation	Map Booklet Page No
59	Gerry Eakin c/o Kenneth Lonergan & Associates Ltd	34

Summary of Submission & Issues Raised

- Requests that the lands (2.99 ha) at Mullanarry, Kingscourt Road is zoned as 'Residential' instead of 'Strategic Residential Reserve'.
- The lands are serviced from adjoining development and are adjacent to schools, recreation facilities, shops and industrial structures.
- Wish to develop the plot and apply for taking in charge of the adjacent development as the plot will offer completion of the estate and improve the visual perspective from the public roads.
- There is a high demand for suitable residential family houses in Carrickmacross and the site will be developed immediately to match the existing adjacent development.
- Permission was granted in 2007 for residential units on this plot but due to the downturn the completion of the estate has been delayed and failure to include this plot for residential use will remove the potential to develop.
- Developer has completed Drummond Radhairc, Corr an Tobair, Sean Carriag and has a proven track records of delivering high standard estates in the town.

Chief Executive's Response

Although the lands are sequentially well located, the extent of greenfield lands available for residential development within Carrickmacross in more appropriate locations are sufficient to meet the projected population increase over the plan period. In addition, there are issues relating to the existing intensive agricultural and waste disposal enterprises in close proximity to the subject lands which could cause detriment to residential amenity of future occupants of residential development. Consequently, these lands should be retained as 'Strategic Residential Reserve' until these issues are resolved.

Chief Executive's Recommendation

No amendment recommended.

Submission No	Name/Organisation	Map Booklet Page No
60	Michael Connolly c/o Kenneth Lonergan & Associates Ltd	35

Summary of Submission & Issues Raised

- Requests that lands at Cloghally Lower (1.02 ha) are included in the Carrickmacross settlement envelope and zoned for low density residential development.
- Land is readily serviced with mains sewerage, has pedestrian linkage to the town, is adjacent to schools, recreational facilities, shops and industry.
- Surrounding lands are in residential use and it appears the plot is an exclusion from the settlement envelope which extends 800m to the west.
- High demand for suitable family homes in Carrickmacross and lands would be developed for housing if zoning permitted it.
- Consider that the site is infill and low-density development would match existing development adjacent.
- Previously zoned lands have not been developed and some of the plots have either poor access or are in long term ownership with no development planned. No development contributes to the stagnation of the town.
- Indicative layout plan for serviced sites submitted for illustration purposes.

Chief Executive's Response

The exclusion of these lands from the Carrickmacross settlement envelope are based on the fact that they are located on the fringe of the town and they are only bounded by existing development on one side. The inclusion of these lands for residential use could be prejudicial to the development of the industrial lands adjoining and immediately northwest of the lands. Furthermore, the extent of greenfield lands available for residential development within the settlement envelope in more sequentially appropriate locations are sufficient to meet the projected population increase over the plan period.

Chief Executive's Recommendation

No amendment recommended.

Submission No	Name/Organisation	Map Booklet Page No
61	Vanessa, Clive, Yolanda & Karl Mc Mahon c/o Kenneth Lonergan & Associates Ltd	36

Summary of Submission & Issues Raised

- Requests that a plot of land (1.33 ha) at Drummond Otra be zoned 'Proposed Residential' instead of 'Industry/Enterprise/Employment'.
- The plot is serviced by mains water and sewage and development of this plot would represent the sequential development of the town, and adjacent lands are zoned for residential use.
- Lands are close to schools, recreational facilities (Lisanisk Lake), shops and industrial development and is accessible by public footpaths and is proximate to bus stop and the bypass.
- Plot offers suitable residential development on approach to the town and client wishes to develop immediately on grant of planning permission.
- High demand for suitable family houses in Carrickmacross. Site is infill and well screened with mature trees and hedgerows.
- Previously zoned lands have not been developed to date.
- Letter submitted from auctioneer stating that there has been no interest to date for development of lands for industrial use due to restricted access road.
- Market interest for development of lands for residential purposes, however zoning has precluded further consideration of this.
- Indicative layout plans for development of eight detached low-density units submitted for illustration purposes.

Chief Executive's Response

It is acknowledged that that the site is sequentially close to the town centre, schools and public amenities. Notwithstanding the adjacent 'Industry Enterprise and Employment' zoning it is noted that the adjacent lands have not been developed to date for Industry. In the event that these adjoining lands are developed in the future there is scope to provide a landscape or other buffer to minimise impacts on any residential properties that would be developed on the subject lands. It is also acknowledged that the 'Industry Enterprise and Employment' zoning permits a broad range of uses many of which are compatible with residential development. The Industrial lands adjacent are already abutting residential uses on three sides and therefore an amendment of zoning from 'Industry

Enterprise and Employment' to residential use would be in keeping with the existing pattern of development in the vicinity and would not introduce a use that is not already existing.

It is also considered that the current access to the subject lands is a laneway which may not be suitable for HGV traffic associated with the current zoning for 'Industry, Enterprise and Employment' and that the alternative access to the adjacent undeveloped Industrial lands via the Steadfast Estate is unsatisfactory.

It is considered that, given the characteristics of the site and the pattern of surrounding residential development, the site is suitable for 'Proposed Residential B' zoning.

It should be noted that the lands indicated in the map accompanying this submission include a mixed land use zoning, the larger part of the site is zoned for 'Industry, Enterprise and Employment', a portion is zoned as 'Existing Residential' and a smaller portion to the east of site is zoned 'Landscape Protection/Conservation' on the basis that they are at risk of flooding.

Chief Executive's Recommendation

It is recommended that the subject lands currently zoned 'Industry, Enterprise and Employment' be amended to 'Proposed Residential B' in accordance with the Core Strategy Summary on page 125.

Submission No	Name/Organisation	Map Booklet Page No
62	Paddy & Eileen Lonergan c/o Kenneth Lonergan & Associates Ltd	37

Summary of Submission & Issues Raised

- Requests that an access be provided within lands zoned as Landscape Protection/Conservation to allow access into a portion of land tract zoned as 'Town Centre' which is suitable for residential development.
- The plot within client's ownership is zoned as 'Town Centre' and it lies within a collection of large rear gardens with no suitable access to them.
- The plot is serviced, accessible and adjacent to schools, recreational facilities, shopping and social structures.

Chief Executive's Response

The potential to develop the subject lands for town centre expansion is recognised, as is the difficulty in providing any suitable direct access into the lands from Farney Street. However, the request to permit an access through lands zoned as 'Landscape Protection/Conservation' would set an undesirable precedent given that this land use zoning is provided for in numerous areas throughout the Plan area. To facilitate any such proposal for backland development at this location it is considered that the Town Centre land use zoning could be extended over a portion of lands currently zoned 'Landscape Protection/Conservation' adjacent to Convent View in order to accommodate direct access to the lands.

Chief Executive's Recommendation

It is recommended to extend the 'Town Centre' land use zoning from the rear gardens of the properties along Farney Street over a portion of the lands currently zoned 'Landscape Protection/Conservation' adjacent to Convent View to provide for suitable access to these lands.

Submission No	Name/Organisation	Map Booklet Page No
64	Jim & Colm Mc Bride c/o Ken Lonergan & Associates	38

Summary of Submission & Issues Raised

- Submission requests that 1.04 ha plot of land at Magheross be zoned for 'Low Density Residential'.
- The plot is serviced by mains water and sewage.
- The development envelope for the town extends 400-500m beyond this plot, is close to schools, recreational facilities, shops and industrial development, is close to bus stop / public transport / the bypass.
- The plot appears to be a definite exclusion from the town envelope.
- The lands offer suitable residential development on approach to the town and clients wish to develop immediately on grant of planning permission. Clients have necessary skills and finance to commence a development of serviced sites immediately.
- Lands zoned for residential use in previous plans have not been developed for reasons relating to access, long term ownership and lack of finance.
- There is a high demand for suitable family houses in Carrickmacross, and the site would cater for new dwellings or upgrading from other dwellings, releasing existing housing stock for re-use.
- The site has the benefit of mature trees and hedgerows.
- Indicative layout plans for serviced sites submitted for illustration purposes.

Chief Executive's Response

It is considered that adequate lands have been zoned within the settlement envelope for 'Proposed Residential B' and the extent of lands zoned are sufficient to meet the population projections for this settlement over the plan period 2019-2025. Furthermore, there is a flood risk on a portion of these lands and there is no justification to extend the settlement envelope to include these lands.

It should be noted that the availability of resources to complete a development is not a consideration when determining the appropriate zoning for a site/land parcel.

Chief Executive's Recommendation

No amendment recommended.

Submission No	Name/Organisation	Map Booklet Page No
65	Colm and Jim Mc Bride c/o Ken Lonergan & Associates	39

Summary of Submission & Issues Raised

- The submission refers to a parcel of land 2.43 ha at Nafarty and requests that the land is all zoned for 'High Density Residential' instead of 'Industry Enterprise and Employment'.
- The plot is serviced by mains water and sewage and the development envelope for the town extends 1200m beyond this plot.
- It is close to schools, recreational facilities, shops and industrial development and offers suitable residential development on approach to the town and clients wish to develop immediately on grant of planning permission. Clients have necessary skills and finance to commence a development of serviced sites immediately and have proven record of completing developments in the town.
- There is a high demand for suitable family houses in Carrickmacross, and the site would cater for social and mixed housing with high energy ratings.
- The site is infill making best use of existing services and location and its development would complete a vista on approach to Carrickmacross Town.
- Indicative layout plans for development of 48 units submitted for illustration purposes.

Chief Executive's Response

The site indicated in the submission broadly encompasses the majority of site No 5 as set out in the Carrickmacross Settlement Plan, but takes no account of an indicative road proposal to the north/northwest of the site which would act as a buffer between the 'Industry, Enterprise and Employment' zoning and the 'Proposed Residential' zoning. Although it does include a small portion of lands proposed to be zoned 'Industry, Enterprise and Employment', it does not include a portion of land to the southwest which incorporates an existing small-scale farm complex proposed to be zoned 'Proposed Residential A' which will provide for further housing. Given that the small portion of lands referred to in the submission are contiguous to the larger parcels of lands proposed to be zoned 'Industry, Enterprise and Employment' is recommended that the zoning objectives for the overall site be maintained as 'Proposed Residential A' as set out in the draft plan.

Chief Executive's Recommendation

No amendment recommended

Submission No	Name/Organisation	Map Booklet Page No
66	Peter McMahon T/A McMahon & Eakin Ltd c/o Kenneth D. Lonergan & Associates Ltd	40

Summary of Submission & Issues Raised

- Requests that the lands (2.56ha) outlined on attached map at Nafarty be zoned as 'Residential'.
- Lands are serviced by mains water sewage and surface water networks and other services including gas and digital services and are located within the settlement envelope.
- Plot is adjacent to schools, recreation facilities and offers suitable residential development on approach to the town and clients wish to develop immediately on grant of planning permission.

Chief Executive's Response

The lands are proposed to be zoned as 'Proposed Residential A' in the draft Plan and therefore the land use zoning meets the request set out in this submission.

Chief Executive's Recommendation

No amendment recommended.

Submission No	Name/Organisation	Map Booklet Page No
67	Brian Ward & Breda Maroney Ward c/o Kenneth D. Lonergan & Associates Ltd	41

Summary of Submission & Issues Raised

- Requests that the lands (0.42ha) outlined on attached map at Cloghally Lower, Carrickmacross be zoned as 'Low Density Residential'.
- Lands are of suitable size, are adjacent to footpaths, public lighting and public services, schools, recreation facilities, shopping and industrial structures.
- Plot appears to be a definite exclusion on the development envelope for no apparent reason and would offer suitable residential development on approach to the town where a high demand for residential family units exists.
- Large portion of lands zoned previously have had no interest in developing and many have poor access or are on a long-term ownership whereby finance may be prohibiting development.

Chief Executive's Response

The exclusion of these lands from the Carrickmacross settlement envelope are based on the fact that they are located on the fringe of the town and they are only bounded by existing development on one side. The inclusion of these lands for residential use could be prejudicial to the development of the industrial lands adjoining and immediately northwest. Furthermore, the extent of greenfield lands available for residential development within the settlement envelope in more sequentially appropriate locations are sufficient to meet the projected population increase over the plan period.

Chief Executive's Recommendation

No amendment recommended.

Submission No	Name/Organisation	Map Booklet Page No
74	Michael & Emer McKittrick, c/o EHP Services	42

Summary of Submission & Issues Raised

- Requests that the lands measuring 6.08 ha at Lurgans and Derryolam be zoned as 'Proposed Residential A and B' (Site 1) and as 'Proposed Residential A' (Site 2).
- Also request the deletion of 'Residential A' on Site 17 and the designation of existing Shercock Road dwellings as 'Existing Residential'. Site 17 has no direct access to the existing road network and will merge two developments into an excessive housing estate.
- Site 1 at Lurgans was zoned residential under the 2007 Development Plan but has no zoning objective in the current Plan. The owners are eager to develop the site in a comprehensive manner to ensure the co-ordinated delivery of key infrastructural requirements such as the R178/R179 link road.
- Site 2 is low lying land located between the Shercock and Mullinary Road with vehicular access onto the main road.
- Newly residential zoned lands to the north, east and south of the town centre are both conspicuous and problematic within the context of proper planning, are not sequential and appear to facilitate further urban sprawl rather than progressive consolidation of the town's urban form.
- Previously zoned residential lands have not delivered any substantial quantum of new housing stock and newly zoned land appears to be identified by their proximity to existing housing estates rather than a sequential assessment of infrastructure or desirability to have such lands developed.
- Client's lands are much more accessible either by car, foot or bicycle and once developed will represent the logical and organic extension of existing residential developments along the Shercock and Mullinary roads.

Chief Executive's Response

Although both parcels of land are located one kilometre to the west of Carrickmacross town centre along the Shercock road, they are outside of the existing settlement envelope. Whilst it is acknowledged that these lands are contiguous to the Carrickmacross settlement envelope, there remains sufficient undeveloped lands within the boundaries of the existing settlement envelope which are considered sequentially appropriate and suitable for residential development, and the extension of the settlement envelope to include these land parcels is not justified. A number of land parcels

zoned as 'Proposed Residential' provide sufficient potential for residential development to the western side of the town and it is considered that lands zoned in other locations within the existing footprint of the town are sequentially more appropriate than the subject lands. Furthermore, Site No. 2 is a flood risk area with a history of flooding and cannot therefore be considered for development.

Chief Executive's Recommendation

No amendment recommended.

Submission No	Name/Organisation	Map Booklet Page No
76	Dermot Conlon c/o Finnegan & Jackson	43

Summary of Submission & Issues Raised

- The submission requests that plot of land (1.24 ha) at Dundalk Road currently zoned 'Strategic Residential Reserve' be zoned 'Proposed Residential B'.
- There have been several enquiries signalling interest in the site for development for residential use and it is serviced with amenities such as footpaths and public lighting.
- There is limited 'Proposed Residential B' south of town and the site is near the bypass and is suitable for commuters.
- Purpose of 'Strategic Residential Reserve' lands is to reserve parcels of land until 'Proposed Residential' lands are built on. Priority should be given to upgrade these lands to 'Proposed Residential' and the introduction of previously unzoned lands for inclusion as 'Proposed Residential A' or 'B' defeats the purpose of having a residential reserve category.
- Shortage of housing in Carrickmacross town and local needs apply beyond the settlement boundary.
- Road widening occurred on adjoining carriageway, and sight distances were put in place to future proof the development of the site. This will provide the main access to the lands and the layout of any future proposal for this site will reflect this. Other zoned lands zoned as 'Proposed Residential' with access difficulties will prevent the development of sites deemed more suitable.

Chief Executive's Response

It is considered that there are sufficient lands located within the settlement boundary sequentially closer to the town which are suitable for 'Proposed Residential' development over the plan period and are sufficient to meet the projected population increase over the plan period. It should be noted that the 'Strategic Residential Reserve' zoning permits the provision of a single dwelling for a landowner provided the development does not compromise the future development of the overall land parcel.

Chief Executive's Recommendation

No amendment recommended.

Core Strategy Summary - Carrickmacross

The Housing Land Requirement (HLR) for Carrickmacross is 25.9 ha. As a result of the submissions received a number of zoning changes are recommended in Carrickmacross which have implications for the Core Strategy Figures as expressed in Chapter 3 of the Draft Monaghan County Development Plan 2019-2025.

The left hand column of the table below shows the lands to be added to take account for the provision of a school on 'Proposed Residential' lands and also the lands to be zoned 'Existing Residential' in accordance with the Chief Executive's recommendation, while the right hand column shows the lands where zoning is recommended to be changed as a result of the changes in the left hand column.

The Chief Executive's report recommends that the zoning of the lands measuring 3.81 ha at Kilmactrasna (Site No 16 in Draft Plan) change from 'Proposed Residential A' to 'Existing Residential' on the basis that construction works have commenced and are ongoing on these lands.

In order to address Submission No 75 from the Department of Education and Skills seeking the selection of a school site it is recommended that an additional 1.25 ha of land be zoned for 'Proposed Residential A' which would also facilitate the development of a school. It is deemed reasonable to take this approach on the basis that schools generally tend to be located close to residential areas.

The additional lands relating to Site No 16 and submission No 75, provides an additional 5.06 ha of residential lands which can be allocated elsewhere.

In deciding what land to allocate/zone 'Proposed Residential' consideration must be given firstly to lands currently zoned 'Strategic Residential Reserve'. The most sequential site to the town centre zoning is a plot measuring 2.03 ha at Magheross and it is recommended that this be rezoned from 'Strategic Residential Reserve' to 'Proposed Residential B'.

The next most sequential site for consideration for inclusion as 'Proposed Residential A' or 'B' is lands at Mullinary which are the subject of submission 59, however this submission was discounted on the basis of amenity concerns, the lands are contiguous to a piggery. The next most sequential 'Strategic Residential Reserve' site is at Drummond Otra and measures 1.70 ha (see Page 44 of Map Booklet)

Submission No 61 requested that lands currently zoned for 'Existing Residential, Industry, Enterprise and Employment' and 'Landscape Protection/Conservation' be amended to 'Proposed Residential B'.

The Chief Executive considered that the land measuring 0.93 ha currently zoned 'Industry, Enterprise and Employment' is suitable for change to 'Proposed Residential B' on the basis of its sequential location and proximity to local amenities. The remaining 0.4 ha of land included in this submission will remain unchanged as 'Existing Residential' and as 'Local Landscape Protection/Conservation' due to it being identified as being at risk of flooding.

These three sites 1) Magheross, 2) Drummond Otra (Lisanisk Lane) and 3) Drummond Otra (Dundalk Road) taken together measure 4.66ha.

Taken together the additional 1.25ha of zoned lands to accommodate a future school site and the 3.81ha changing from 'Proposed Residential' to 'Existing Residential' provides sufficient lands to facilitate the recommendations for Submissions No 61 and the change of a total of 3.73 ha of lands from 'Strategic Residential Reserve' to 'Proposed Residential' uses at Magheross and Drummond Otra (refer to table below)

Site in Draft Plan	-	Site in Draft Plan	+
'Proposed Residential' lands for School Site	1.25ha	Change from 'Industry, Enterprise & Employment' to 'Proposed Residential' (Drummond Otra)	0.93 ha
Change from 'Proposed Residential' to 'Existing Residential' (Kingscourt Rd)	3.81 ha	Change from 'Strategic Residential Reserve' to 'Proposed Residential' (Drumcondra Rd)	2.03 ha
		Change from 'Strategic Residential Reserve' to 'Proposed Residential' (Dundalk Rd)	1.70 ha
Total	5.06 ha	Total	4.66 ha
		Overall Change	-0.40 ha

Castleblayney

Submission No	Name/Organisation	Map Booklet Page No
2	Patrick McBride, Peter Coleman & Macartan Lambe	47

Summary of Submission & Issues Raised

- Submission requests that lands measuring 0.89 ha at Annahale are included within the Castleblayney Settlement envelope and zoned for low density residential development.
- Lands are part of the Old Coach Manor Estate where planning permission has expired. Eight houses have been constructed to date and the development has been taken in charge.
- The subject lands are serviced by sewer, water, telephone and electricity and the associated access road is in good condition.

Chief Executive's Response

It is considered that there are sufficient greenfield lands located sequentially closer to the town centre to cater for the projected population increase anticipated for Castleblayney over the plan period. In addition, the public road serving these lands have limited width. However, given the pattern of development which has evolved along this road and the fact that the subject lands are bounded on three sides by existing residential development, it is considered appropriate to include these lands within the Castleblayney Settlement Plan boundary and to zone them as 'Strategic Residential Reserve'.

Chief Executive's Recommendation

It is recommended to extend the boundary of the Castleblayney Settlement envelope to include these lands and the existing dwellings to the south of these lands, and to zone the subject lands (0.89 ha) as 'Strategic Residential Reserve'.

Submission No	Name/Organisation	Map Booklet Page No
10	Fiona & Brian Mc Guinness	48

Summary of Submission & Issues Raised

- The submissions requests that a special designation be made in the Monaghan County Development Plan 2019-2025 to permit development on a limited area of shoreline (2.79 ha) adjacent to Lough Muckno to allow for the development of tourist accommodation to enhance the local area.
- An agreement has been reached between Monaghan County Council and the Irish Angling Development Alliance to allow for the development of angling pegs on the subject lands along the full stretch of shoreline at the South Lodge point of Lough Muckno. Work is due to commence on this project in summer 2018, which will attract additional angling tourists.
- It is considered that the development of tourist accommodation along this stretch would complement this angling development and would also complement Concra Wood Golf Club as the subject lands adjoin the golf course.
- The development could consist of floating homes, log cabins or more traditional cottages in an environmentally friendly manner.
- The individuals making this submission already own and operate a successful self-catering business at Toome. If further development was facilitated, it would serve to expand the landowners' existing business, bring additional employment and attract additional tourists/tourism spend to the area.

Chief Executive's Response

The subject site is located outside the settlement envelope of Castleblayney and therefore no specific zoning objective applies to this site. Lough Muckno and its environs is one of only two designated Areas of Primary Amenity within the Monaghan County Development Plan 2019-2025 and is considered one of the premier tourist attractions in County Monaghan due to the nature of its unspoilt natural landscape. Lough Muckno is also designated as a proposed Natural Heritage Area (pNHA) (Table 6.3 of Draft Plan). Policy PAP1 and CB05 seek to protect and promote Lough Muckno and its environs to promote tourism development within the county and to conserve the landscape and natural heritage. There are a number of policies set out in the Plan that provide for appropriate tourism accommodation within the County and it is considered unnecessary to provide a specific designation for the subject lands in this regard.

Chief Executive's Recommendation

No amendment recommended.

Submission No	Name/Organisation	Map Booklet Page No
14	Janette Coogan	49

Summary of Submission & Issues Raised

- Submission requests that 1.58 ha of land at Annahale are zoned as 'Proposed Residential A' instead of 'Strategic Residential Reserve' in the Castleblayney settlement plan.
- It is stated that subject site was previously occupied by a number of agricultural buildings and should be considered as a 'brownfield site' and is also an infill site located between an established pattern of residential development.
- In accordance with policies UDO5 & UDO6 sequential residential development should be focussed on infill sites within the town boundary.
- The strict provisions of the 'Strategic Residential Reserve' zoning objective only allow these lands to be considered for release once 75% of the proposed residential has been developed and effectively sterilises/prohibits any form of development of the lands
- The submission refers to the significant amount of land zoned for 'Industry, Enterprise and Employment' uses to the west and north of Castleblayney town, submits that this level of zoning is unbalanced for the size of the town and questions where employees would live in the event that the extent of lands zoned 'Industry, Enterprise and Employment' zonings are developed during the lifetime of the plan as the extent of residential land zoned would not yield sufficient unit numbers to facilitate the growth envisaged.
- Submission refers to the Development Plan Guidelines for Planning Authorities which refers to the need to achieve a balance between zoning sufficient land to achieve the economic and social needs of the area and avoiding over zoning which would create disorderly development or which is inadequately serviced.

Chief Executive's Response

While it is acknowledged that the site was previously used for agriculture, it has been disused for a number of years and the agricultural buildings are no longer in situ. The site is located approximately 1.15km from the main street. It is considered that the site cannot be defined as infill or brownfield in the context of assisting town centre regeneration and renewal.

The most appropriate land use zoning for these lands is 'Strategic Residential Reserve' given their location of the edge of settlement and that access constraints exist. There are sufficient lands available in sequentially closer locations to the town centre that if developed will provide for the projected growth of Castleblayney over the plan period in a sustainable and sequential manner.

A strategic aim of the Plan is to support the provision of employment opportunities in County Monaghan. Castleblayney is a secondary economic centre in the County and it is recognised that the settlement has the capacity to provide new employment in strategic locations. The provision of appropriately zoned lands for 'Industry, Enterprise and Employment' will assist in the delivery of this strategic aim to support the provision of employment.

Chief Executive's Recommendation.

No amendment recommended.

Submission No	Name/Organisation	Map Booklet Page No
22	JC Developments Ltd c/o PDES Chartered Planning Consultants	50

Summary of Submission & Issues Raised

- The submission requests that 3.31 ha of land zoned as 'Strategic Residential Reserve' at Annahale, Castleblayney is zoned as 'Proposed Residential'.
- The site is brownfield, having been previously developed for housing in 2006 when works on the site halted due to economic downturn. Access road, footpath, site preparation works, foul and storm sewer networks and pumping station are in situ having been constructed as part of permitted development 00/1184.
- The submission suggests that the growth rate for the County should be increased to 1.6% per annum which would require an additional 225 persons to be provided for in the Core Strategy for Castleblayney.
- The HLR allocation of 16 ha in the Draft Plan is not reflective of the actual lands available for development and submission refers to extant permissions/committed development on sites No 2 and 8 of the Draft Plan as well as Site 3 being acquired by the Department of Education for a school.
- Submission refers to objective CSP11 of the Regional Planning Guidelines which states that in situations where it is proposed to exclude brownfield sites from the Housing Land Requirements, justification should be provided for their exclusion.
- 'Strategic Residential Reserve' should be omitted and replaced with serviced sites as an alternative to one off housing.
- Submissions submits that the suggested amendment from 'Strategic Residential Reserve' to 'Proposed Residential' is consistent with objectives 3, 5, and 7 and Section 4.5 of the NPF.

Chief Executive's Response

The most appropriate land use zoning for these lands is 'Strategic Residential Reserve' given their location of the edge of settlement and surrounded by residential use. There are sufficient lands available in locations sequentially closer to the town centre that if developed will provide for the projected growth of Castleblayney over the plan period in a sustainable manner. It is considered that the site cannot be defined as brownfield in the context of assisting town centre regeneration and renewal. There is also a pluvial flood risk within the site in a wetland area which has been filled. The core strategy and population projections set out in the Plan provide for a modest growth for the towns

and villages of County Monaghan and any increase in these projections is considered unjustified. Furthermore, the population projections as set out in the Plan are in accordance with those prescribed by the 'Implementation Roadmap for the National Planning Framework' published in July 2018.

Chief Executive's Recommendation

No amendment recommended.

Submission No	Name/Organisation	Map Booklet Page No
26	Paul Mc Cormack c/o CSP Pringle	51

Summary of Submission & Issues Raised

- The submission requests that 0.49 ha of land zoned as 'Strategic Residential Reserve' at Corracloghan is zoned as 'Proposed Residential A'.
- Subject lands are fully serviced with water, sewerage, electricity, public footpath and public lighting.
- The pattern of development in the vicinity consists of one off dwellings on sizeable plots. The subject site is the only vacant plot in the immediate vicinity and as such can be regarded as an infill site.
- It is proposed to provide three detached dwelling units on this plot, the form of development will allow the purchaser to design and build the house type of their choice.
- The submission refers to the provisions of the Sustainable Residential Development in Urban Areas Guidelines, 2009 which advocates the use of low density development on serviced lands on the edge of towns and villages to offer an alternative to urban generated housing in the rural area.

Chief Executive's Response

It is acknowledged given its limited size and the prevalent character of adjacent development which consists of individual dwellings on roadside plots that the appropriate zoning for this site would be 'Proposed Residential B'. However, it is considered that the extent of greenfield lands available for residential development within the settlement envelope in more sequentially appropriate locations are sufficient to meet the projected population increase over the plan period.

Chief Executive's Recommendation

No amendment recommended.

Submission No	Name/Organisation	Map Booklet Page No
35	Berwat Construction Ltd c/o Fenton Associates	52

Summary of Submission & Issues Raised

- The submission requests that a plot of land at Killycard measuring 4.86 ha is zoned to provide for a single land use zoning objective as 'Proposed Residential A' and will contribute to the objective of urban strengthening set out in the Draft Plan. The Draft Plan proposes three zoning objectives for these lands; 'Proposed Residential B', 'Strategic Reserve' and 'Industry, Enterprise & Employment'.
- Permission was granted for a 91 unit housing development under 08/226, an extension of duration was granted and work commenced on site in 2018.
- Given the proximity of the site to the town centre, surrounding land uses for housing, access to infrastructure and the planning history of the site, the site should be zoned for 'Proposed Residential A' in its entirety.
- The site represents the logical sequential development to the west of the town and there is a permitted development on Site No 2.
- The carrying out of the permitted residential development of these lands will provide the infrastructure to service the development of the adjoining lands in the near future.

Chief Executives Response

It is acknowledged that since the publication of the draft plan construction has commenced on this site and as such the portion of the subject lands upon which development has commenced should be zoned as 'Existing Residential'.

Chief Executives Recommendation

It is recommended to amend the proposed land use zoning in the draft plan on these lands as follows; Amend 2.71 ha of land proposed to be zoned as 'Strategic Residential Reserve' to 'Existing Residential', and amend 0.81 ha of land proposed to be zoned as 'Proposed Residential' to 'Existing Residential' and also 0.48ha's of land zoned as 'Industry, Enterprise and Employment' to 'Existing Residential' in accordance with the Core Strategy Summary on page 145.

Submission No	Name/Organisation	Map Booklet Page No
36	Berwat Construction Ltd c/o Fenton Associates	53

Summary of Submission & Issues Raised

- The submission requests that a plot of land at Conabury measuring 1.45 ha be zoned in its entirety for 'Proposed Residential' use instead of approximately half of the site (0.57 ha) being zoned for 'Landscape Protection/Conservation'.
- The site is located within a built-up residential area and is effectively an infill site which currently has permission extended until 2018 for development of 10 detached family type houses.
- It is asserted in the submission that the development of these lands will not impact on the character of the area, views of the site are limited to the Dundalk road and there is a precedent of development at a higher level than the subject site.
- The development will have no impact on Core Strategy or Plan objectives due to the fact that there is an existing permission on the land for 10 units.

Chief Executive's Response

The extension of duration of the planning permission referenced expired in May 2018. A portion of this site 0.57 is zoned for 'Landscape Protection/Conservation' due to the elevated nature of the lands. It is considered this zoning is the most appropriate zoning for this portion of the site.

Chief Executive's Recommendation

No amendment recommended.

Submission No	Name/Organisation	Map Booklet Page No
44	Francis McGuigan c/o McGuigan Architects	54

Summary of Submission & Issues Raised

- Requests the 1.65 ha of lands at Dummillard Little are zoned for the purposes of commercial development rather than as 'Industry, Enterprise, and Employment'.
- Considers this land use zoning to be more beneficial to the existing business park in the creation of sustainable development where the proposed use would complement the existing occupants and further promote the vacant units.

Chief Executive's Response

Having regard to the provisions of the Development / Zoning Matrix set out in the draft development plan, it is considered that amending the zoning of these lands to 'Existing Commercial' would not represent any significant benefit or result in a more sustainable form of development, and given that the lands were previously zoned as 'Industry, Enterprise, and Employment' in the previous two development plans, it would be appropriate to retain this land use zoning for these lands.

Chief Executive's Recommendation

No amendment recommended.

Submission No	Name/Organisation	Map Booklet Page No
45	Joe Brennan & Piers Hughes c/o McGuigan Architects	55

Summary of Submission & Issues Raised

- Request the lands measuring 0.59 ha located off Bog Road, Drumillard Big are zoned for the purposes of residential development instead of 'Industry, Enterprise and Employment'.
- The lands are located in a predominantly residential area and are serviced by all necessary facilities.
- Questions the zoning of existing school on adjoining lands as 'Industry, Enterprise and Employment'.
- Current zoning has proved unviable and unattractive due to the site being isolated from the main transport corridors, access through town centre and residential areas is restrictive, accessibility to N2 makes this site economically unfeasible and the existing land uses within the immediate proximity of the site are prohibitive for the current zoned use.
- A residential zoning at this site will increase foot fall to Muckno Street and aid a struggling retail sector within the town, as a lack of residential development to the northern side of the town centre could be considered as contributing to the leakage of business to other retail centres.
- Proximity of the site provides opportunity to contribute to vitality and viability of the town and could be considered an integral part of any action plan as set out in CBO1 and CBO2.
- Considers these lands more suitable for residential development and better placed than other sites which are further from the town centre.
- Landowner has the necessary resources to see residential development proceed on these lands.

Chief Executive's Response

These lands, whilst in close proximity to existing residential units, also adjoin lands which have commercial units (warehouses) and a substantial hardware and building supplies unit. Therefore, it is appropriate that the land use zoning for this wider area, of which these lands are part of, is for 'Industry, Enterprise and Employment'. To include the lands as requested for residential use would be contrary to the wider land use zoning provision for these lands and may have a negative impact on the further expansion of this area for employment uses. Furthermore, the amount of lands in other

suitable locations of Castleblayney for residential use mean that there are sufficient lands available to provide for the projected population growth over the plan period.

Chief Executive's Recommendation

No amendment recommended.

Submission No	Name/Organisation	Map Booklet Page No
48	Jason Hughes c/o CS Pringle	56

Summary of Submission & Issues Raised

- The submission requests that a portion of lands (6.74 ha) at Killycard proposed for 'Industry, Enterprise and Employment' uses be de-zoned and retained as agricultural use.
- The submission outlines that the owner wants to continue to farm the subject lands and it is vital to the economic future of the small farm that they stay as agricultural.
- Their retention as agricultural land will act as a buffer between the remaining proposed industrial lands and the existing stock of residential properties in the vicinity.
- The submission highlights that 127 ha of land has been zoned for 'Industry, Enterprise and Employment' over the plan period. The removal of 6.74 ha of this will not have a significant impact on Castleblayney.

Chief Executive's Response

It is considered that the zoning of lands within the settlement envelope for development would not impede the landowner's rights to farm the lands if it is his wish to continue to do so. It is paramount that the potential for lands located within and adjacent to the larger settlements are considered within the context of the sustainable expansion of the settlement. These lands are on the fringes of the existing built up form of Castleblayney, close to the town centre, and as such are sequential to the expansion of the town and considered appropriate in a wider and longer term context for development. However, having regard to the proximity of existing residential development to the immediate east and south of the subject lands as well as the nature and extent of the proposed land use zonings in the immediate vicinity, it is considered that these lands could be considered suitable for 'Strategic Residential Reserve'. This land use zoning would permit the landowner to obtain planning permission for a single dwelling for himself in accordance with this land use objective and other relevant development plan objectives and policies.

Chief Executive's Recommendation

To amend the land use zoning for the subject lands (6.74 ha) to 'Strategic Residential Reserve'.

Submission No	Name/Organisation	Map Booklet Page No
49	Harry Hughes c/o CS	57

Summary of Submission & Issues Raised

- The submission requests that lands totalling 8.70 ha at Drumillard Big be zoned to provide for 'Industry, Enterprise and Employment'.
- The lands are zoned 'Industry, Enterprise and Employment' in the current Monaghan County Development Plan 2013-2019, the submission questions the removal of this zoning given the position of the site adjacent to the Castle Cool Industrial Estate which has been very successful, and these lands could facilitate any future expansion of this site.
- The site has direct access onto the Monaghan Road and is in close proximity to the Castleblayney Bypass.
- In the event that the proposed inner relief road connecting the Keady Road to the Monaghan road goes ahead, the site will be well located.
- 127 hectares of land are zoned for 'Industry Enterprise and Employment' uses over the plan period and the rezoning of these lands for this purpose will not have a significant impact on the overall extent of lands zoned for this purpose.
- The site can be easily serviced due to its location adjacent to an established industrial site.

Chief Executive's Response

The area of land zoned at this location had been proposed to be reduced from the current development plan due to access constraints and topography. However, given the arguments put forward the landowner regarding to potential to allow the existing industrial area to expand, it is considered appropriate that these lands are suitable to provide for expansion of existing enterprises and the introduction of new employment opportunities to the town. However, given the topography of these lands, the addition zoning should be extended to comprise those lands zoned for 'Industry, Enterprise and Employment' in the current Monaghan County Development Plan 2013-2019.

Chief Executives Recommendation

To extend the settlement envelope to include that part of the subject lands for 'Industry, Enterprise and Employment' as set out in the current Monaghan County Development Plan 2013-2019.

Submission No	Name/Organisation	Map Booklet Page No
58	Francis Carragher c/o CS Pringle	58

Summary of Submission & Issues Raised

- Requests that the lands measuring 0.12 ha outlined on attached map at Killycard is zoned as 'Existing Commercial' instead of 'Landscape Protection/Conservation' to enable an extension to the existing service station located on the adjoining lands.
- Plans are ongoing for an immediate extension to the facility and the proposed development will make the use and occupation of the existing business safer for customers and other road users in relation to access/exit and parking capacity.
- An engineer has considered the flood risk issue for the site and states it can be demonstrated that no flooding occurs at these lands and that the flow capacity of the existing drainage channel will be duly replicated in any new development.

Chief Executive's Response

The submission states that the lands are in the ownership of the adjoining existing business and the established nature of this business and the justification put forward with regard to a planned extension of the facility are acknowledged. Given that the lands are subject to flood risk, development could only proceed if the flood risk issue was addressed. Having regard to the circumstances of the lands, it is considered that there may be an engineering solution to the flood risk potential on the site that would permit development on this small parcel of land without creating additional flood risk or exacerbating existing flooding. Thus the zoning of this small parcel of lands as Industry, Enterprise and Employment could be considered in this context.

Chief Executives Recommendation

To amend the land use zoning to 'Industry, Enterprise and Employment' with the imposition of Flood Risk Area demarcation on the zoning map.

Submission No	Name/Organisation	Map Booklet Page No
75	Department of Education	59

Summary of Submission & Issues Raised

- Acquisition process is underway by Department for the provision of a primary school on lands at Bree. It is requested that this site be zoned for 'Education/Community' uses to facilitate this process.

Chief Executive's Response

It is acknowledged that the acquisition of lands at Bree have progressed and that the land use zoning should be revised to reflect this.

Chief Executive's Recommendation

To amend the proposed land use zoning for the subject lands from 'Proposed Residential B' (0.78 ha) and 'Strategic Residential Reserve' (0.88 ha) to 'Community Services/Facilities' in accordance with the Core Strategy Summary on page 145.

Submission No	Name/Organisation	Map Booklet Page No
84	Castleblayney Hurling Club c/o CS Pringle	60

Summary of Submission & Issues Raised

- Submission refers to plot of land at Onomy known as White Island as a possible location for new sports field for Castleblayney Hurling Club
- Current grounds at Concra used for both training and games is leased on short term basis. A more long-term plan for the development of a new facility is required to cater for Club's continued growth.
- Existing facility also used by Castleblayney Camogie Club and Camogie Club has similar numbers to the hurling club.
- Lack of suitable home ground currently hinders progression of clubs and a five acre site is required to cater for club in location near town centre.
- Similar facilities provided in other locations i.e. Kilmacud Crokes GAA Club with sportsfield in the centre and facilities on outskirts for sporting facilities, walkways and recreation. There is a similar example in Ballybay and such facilities have positive impact on health and wellbeing of the community.
- White Island currently facilitates other sporting groups such as fishing clubs and running/walking groups.
- Central area of White Island is not in use and could be ideal as a sport field in conjunction with other compatible sporting facilities.

Chief Executive's Response

The plot of ground measuring 2.44 ha on White Island is designated as an 'Area of Primary Amenity' in the Monaghan County Development Plan 2019-2025 whilst Lough Muckno is classified as a proposed 'Natural Heritage Area'. The site is currently zoned for 'Recreation & Amenity' and this is considered the most appropriate zoning for these lands. Playing fields are a permitted use on zoned 'Recreational and Amenity Lands'. Notwithstanding this any future application on these lands would be required to comply with the provisions of the Development Plan such as visual impact, impact on heritage and ecology, traffic impact and light pollution impact. Lough Muckno and its environs is one of only two designated 'Areas of Primary Amenity' within the Monaghan County Development Plan 2019-2025 and is considered one of the premier tourist attractions in County Monaghan due to the nature of its unspoilt natural landscape. Lough Muckno is also designated as a proposed 'Natural Heritage Area' (pNHA) (Table 6.3 of Draft Plan). Policy PAP1 and CB05 seek to protect and promote

Lough Muckno and its environs to promote tourism development within the county and to conserve the landscape and natural heritage and on this basis it is considered that no amendment be made to the current zoning on these lands.

Chief Executive's Recommendation

No amendment recommended.

Core Strategy Summary - Castleblayney

The Housing Land Requirement (HLR) for Castleblayney is 16 ha. As a result of the submissions received a number of zoning changes are recommended in Castleblayney which have implications for the Core Strategy Figures as expressed in Chapter 3 of the Draft Monaghan County Development Plan 2019-2025.

The left hand column of the table below shows the lands to be added to take account for the provision of a school on 'Proposed Residential Lands' and also the lands to be zoned 'Existing Residential' in accordance with the Chief Executive's recommendation, while the right hand column shows the lands where zoning is recommended to be changed as a result of the changes in the left hand column.

The Chief Executive's report recommends that the zoning of lands measuring 1.54 ha at Killycard (Submission No.35) change from 'Proposed Residential B'/'Strategic Residential Reserve' to 'Community Services and Facilities'. These lands have been purchased by the Department of Education and Skills to facilitate the provision of a new primary school. Of the lands indicated in the submission 0.74ha of the land was zoned 'Proposed Residential' and can now be allocated elsewhere.

In order to accommodate the Chief Executive's recommendations for submission No.35 the report recommends the rezoning of 2.67 ha of land from 'Strategic Residential Reserve' to 'Existing Residential', and the change of 0.81 ha of land from 'Proposed Residential' to 'Existing Residential'.

Taken together the recommendations of submissions No 75 and No 35, 1.57ha of residential lands can be allocated elsewhere.

In deciding what land to allocate/zone 'Proposed Residential' consideration must be given firstly to lands currently zoned 'Strategic Residential Reserve'. The most sequential site to the town centre zoning is a plot measuring 1.60 ha at Moraghy (to the rear of Crescent Hill development). It is recommended that this be rezoned from 'Strategic Residential Reserve' to 'Proposed Residential B' (see page 61 of Map Booklet).

Submission No	-	Site in Draft Plan	+
75 - Change from Proposed Residential to Community Services/Facilities on lands for proposed school site (Shercock Rd)	0.74ha	Change from Proposed Residential to Existing Residential (Rear of Crescent Hill)	1.60 ha
36 - Change from Proposed Residential and Strategic Residential Reserve to Existing Residential (Shercock Rd)	0.83ha		
Total	1.57ha	Total	1.60 ha
		Overall Change	+0.03 ha

Clones

Submission No	Name/Organisation	Map Booklet Page No
1	Peadar Mackle c/o Noel Murphy	64, 65 & 66

Summary of Submission & Issues Raised

- Request that the three land parcels at Largy and Legarhill are zoned as residential.
- The landowner requests that Site A, consisting a plot of land measuring 1.37 ha at Largy, be zoned 'Proposed Residential' instead of 'Industry, Enterprise and Employment'.
- The submission states that lands consisting of 3.32 ha at Annalore Street, Legarhill (Site B) were previously zoned for housing with permission granted for a 40 unit housing development. Site development works commenced but no construction of units has taken place. It is requested that given the upsurge in the housing market, the lands should be zoned 'Proposed Residential' instead of 'Landscape Conservation/Protection'.
- The submission requests that this zoning objective of Site C (0.29 ha) at Legarhill zoned 'Proposed Residential B' in the Draft Plan be amended to 'Proposed Residential A', to provide for multiple residential units.

Chief Executive's Response

Site A - The subject lands are removed from existing residential areas and located within an area of mixed land use ('Industry, Enterprise & Employment' and 'Existing Commercial') with good access and as such is considered more appropriate for employment uses rather than residential use. In addition, industrial serviced sites proposed on former halting site adjacent.

Site B - The subject lands are located on the edge of the settlement boundary, in close proximity to the existing sewerage works and have a challenging topography. It is considered that there are more sequentially appropriate greenfield lands available within Clones town to provide for the projected population increase over the plan period.

Site C - The subject lands are located on the edge of the settlement boundary in a low density residential environment. It is considered that there are more sequentially suitable greenfield lands for the higher density residential development within Clones town to provide for the projected population increase over the plan period.

Chief Executive's Recommendation

No amendment recommended

Submission No	Name/Organisation	Map Booklet Page No
70	Danhall Ltd c/o FJ Coyle & Associates	67

Summary of Submission & Issues Raised

- Requests that the lands (1.09 ha) at Carn be included in the settlement envelope and zoned as 'Proposed Residential'.
- The lands are conveniently located adjacent to public roads, within walking distance of Clones, nearby schools and will not represent urban sprawl unlike other lands zoned which are located a further distance from the town centre than these.
- The increase in lands zoned for industry and employment also requires provision of adequate lands for future residential purposes. The Plan should place greater emphasis on zoning lands in existing urban areas and greater restrictions on single rural housing as required by the RPGs and NPF.
- Population growth of 1.04% is too conservative and should be revised to at least 1.6% given the improved economic conditions and increase the amount of lands zoned for 'Proposed Residential' as lands set out do not provide adequate lands for future population growth.
- Population projections set out in the core strategy falls short of what is envisaged by the RPGs and the core strategy should encourage at least 40% of future population growth and housing requirements in the urban areas.
- 'Strategic Residential Reserve' lands should be omitted from the core strategy and serviced sites should be considered as an alternative to facilitate an alternative to rural housing.

Chief Executive's Response

The extent of lands available for residential development within Clones in more appropriate locations within the existing settlement footprint are sufficient to meet the projected population increase over the plan period notwithstanding the increase in lands zoned for industry and employment uses. These lands are deemed more appropriate on the basis that they represent infilling of undeveloped lands within established residential areas. Furthermore, the subject lands have restricted access issues.

The projected growth as set out in the Core Strategy is considered reasonable in the context of the population analysis and patterns of residential development which have occurred in both County Monaghan over the previous plan periods as well as compliance with the requirements as set out by the NPF. Furthermore, the population projections as set out in the Plan, are in accordance with those prescribed by the 'Implementation Roadmap for the National Planning Framework' published in July 2018.

Any lands zoned as 'Strategic Residential Reserve' are done so by reason of their location in the context of the wider settlement area and considered necessary to ensure that sufficient lands in suitable locations are reserved to provide for the sustainable expansion of the settlements in the future. To permit serviced sites within these lands would be contrary to the Core Strategy and has the potential to dissolve the development potential of these lands in a piecemeal fashion which is considered contrary to proper planning and sustainable development.

Chief Executive's Recommendation

No amendment recommended.

Ballybay

Submission No	Name/Organisation	Map Booklet Page No
6	Carolin & Harry Dooney	70

Summary of Submission & Issues Raised

- Submission supports the proposed zoning of lands measuring 0.29 ha for at Corrybrannan, Ballybay as 'Proposed Residential A'. Request that this zoning be retained in the final plan as it is intended to develop it as soon as possible after the plan is adopted.

Chief Executive's Response

The subject lands are proposed to be zoned as 'Proposed Residential B' in the draft Plan and no change to this is recommended.

Chief Executive's Recommendation

No amendment recommended.

Submission No	Name/Organisation	Map Booklet Page No
11	David & Mairead Carragher	71

Summary of Submission & Issues Raised

- Submission welcomes the inclusion of 1.07 ha of lands at Knocknamaddy within the settlement envelope and zoned as 'Proposed Residential B'. It is an intention to construct a family home soon and it is requested that the proposed zoning objective will not be amended without their consultation.
- Pre-planning with the Area Planner in relation to site advised that a planning application on these lands would be premature pending adoption of the Development Plan in March 2019. The landowners wish to lodge an application before this time and request that this be considered.

Chief Executive's Response

The subject lands are proposed to be zoned as 'Proposed Residential B' in the draft Plan and no change to this is recommended.

Chief Executive's Recommendation

No amendment recommended.

Submission No	Name/Organisation	Map Booklet Page No
53	Cathal Friel c/o Kieran O'Reilly	72

Summary of Submission & Issues Raised

- Requests that a plot of land (0.42 ha) at Knocknamaddy be rezoned for 'Proposed Residential A' instead of 'Existing Commercial'.
- Developing this plot for housing will serve to consolidate the existing residential use along the Castleblayney Road and the site is sequentially closer to the town centre than plots 1-9 of the Ballybay Town Map BBDP1.
- Zoning amendment would be compliant with Policy HSP5 which promotes urban residential development in a sequential manner to maximise the use of infrastructure, promote sustainability and make efficient use of underutilised lands and will support the Development Plan's strategy to regenerate and redevelop vacant lands and will help to counter urban sprawl.
- The subject site is adjacent to all the town amenities, can be readily serviced by existing infrastructure and has no access issues.
- If the lands are rezoned as requested the lands will be developed in the near future.

Chief Executive's Response

The lands are considered as brownfield and were previously in use as a garden centre and yard which has recently ceased trading. The lands are surround by existing residential, are sequential to the town centre and are fully serviced and as such it is considered appropriate to amend the zoning of these lands to residential use.

Chief Executive's Recommendation

It is recommended to zone the subject lands (0.42 ha) at Knocknamaddy as 'Proposed Residential B' and rezone lands to facilitate this as set out in the Core Strategy Summary on page 153.

Submission No	Name/Organisation	Map Booklet Page No
77	Propatunity Ltd c/o The Planning Partnership	73

Summary of Submission & Issues Raised

- The submission refers to a parcel of land totalling 6.19 ha in Corrybrannan. The submission welcomes the residential zoning these lands and requests that an additional portion of lands (0.32 ha) are zoned as 'Proposed Residential A' instead of 'Landscape Protection/Conservation'.
- This amendment is requested to facilitate a preferred layout which the landowners have undertaken as part of a master planning process to present the potential for residential and residential care/retirement homes scheme.
- It is suggested that a portion of land measuring 0.2 ha can be ceded from 'Industry, Enterprise and Employment' zoning to 'Landscape Protection/Conservation'.
- Strongly supports Section 3.25 of Plan and supporting policy objectives set out under 15.13.6, and RDP21 and RDP22 to deliver appropriate accommodation for an ageing population in the principal settlements.
- Suggested that a 'Specific Local Objective' (SLO) be created for the requested additional residential zoned lands (1.98 ha of overall site). The SLO would overlay the 'Proposed Residential' zoning and would effectively reserve this portion of land for specific housing models to provide for an ageing population and as such it is argued that it does not conflict with the stated Core Strategy of the Draft Plan.
- The concept and approach to retirement development is consistent with current government policy.
- A masterplan of the overall site layout has been included with the submission to facilitate the orderly sustainable development of the subject lands and to prevent potential material contraventions of the plan in the future.

Chief Executive's Response

The plan led approach to development at these lands in Ballybay town is welcomed as is the master planning approach being used to outline the overall concept of the scheme. Having regard to the amount of lands zoned for residential development within the settlement it is considered unnecessary to prescribe a 'Specific Local Objective' at these lands which may preclude suitable residential development from proceeding over the plan period.

Chief Executive's Recommendation

No amendment recommended.

Core Strategy Summary - Ballybay

The Housing Land Requirement (HLR) for Ballybay is 10.4 ha. As a result of a submission received zoning changes are recommended in Ballybay which have implications for the Core Strategy Figures as expressed in Chapter 3 of the Draft Monaghan County Development Plan 2019-2025.

The left hand column of the table below shows the lands/submission to be zoned residential in accordance with the Chief Executive's recommendation while the right hand column shows the lands where zoning is recommended to be changed to accommodate the changes in the left hand column.

The Chief Executive's report recommends that the zoning of the lands at Castleblayney Road (Submission No 53) change from 'Existing Commercial' to 'Residential B'. In order to ensure compliance with the Core Strategy, it will be required to change the zoning of lands zoned 'Proposed Residential' to ensure the HLR is not exceeded. Therefore, it is proposed to change the zoning of lands at Monaghan Road (site No.2) from 'Proposed Residential B' to 'Strategic Residential Reserve' (see page 74 of map booklet).

Submission No	+	Site No in Draft Plan	-
53 (Castleblayney Road)	0.42ha	2 (Monaghan Road)	0.59ha
Total	0.42ha	Total	0.59ha
		Overall Change	-0.17ha

Tier 4 & 5 Settlements

Emyvale

Submission No	Name/Organisation	Map Booklet Page No
20	Mairead Loughran	75

Summary of Submission & Issues Raised

- Requests the lands (2.0 ha) at Struath An Mhuillinn to the west of Main Street are included within the Emyvale envelope and zoned for residential development.
- At present, the land zoned in the village consists of either privately owned gardens that will not be available for housing or lands that are prone to flooding.
- Submission sets out the location within commuting distance of Dublin, Derry and Belfast as well as the employment hub of Monaghan town and mentions a number of local industries which would generate demand for houses for employees.
- Both the schools and employment establishments have grown since, and there is an obvious demand for new housing in the near future as no building has occurred in past 10-15 years.

Chief Executive's Response

It is acknowledged that the subject lands are contiguous to the village centre. The lands have potential access issues and there are sufficient undeveloped lands within the village envelope which can provide for the projected population growth over the plan period and as such to expand the village boundary to include these lands is unjustified.

Chief Executive's Recommendation

No amendment recommended

Submission No	Name/Organisation	Map Booklet Page No
27	Steve Lavery, c/o Finnegan & Jackson	76

Summary of Submission & Issues Raised

- The submission requests that a portion of lands measuring 1.49 ha at Scarnageeragh be included within the settlement envelope of Emyvale Village for residential development.
- It is submitted that these lands are a natural progression to the sequential growth of Emyvale and would be easily serviced.
- The submission argues that the settlement of Emyvale has not been increased despite an increase in demand for housing.
- Development on the site would provide planning gain by opening up the environs of Back Loughs as an amenity area via the public road, and the northern part of the site contains an amenity area which could be retained as an area of biodiversity.
- The land lends itself to the construction of a small number of houses and there are limited suitable lands available within the current settlement envelope to provide for such a development.

Chief Executive's Response

It is acknowledged that the subject lands are close to the village centre. However, the lands are not contiguous to the settlement envelope and there are sufficient undeveloped lands within the village envelope which can provide for the projected population growth over the plan period. As such, to expand the village boundary to include these lands is unjustified. It is further noted that part of these lands is in a flood risk area.

Chief Executive's Recommendation

No amendment recommended.

Submission No	Name/Organisation	Map Booklet Page No
37	P. McKenna c/o Ruxton Architectural Services Ltd	77

Summary of Submission & Issues Raised

- Requests entire lands on Mullan Road measuring 1.64 ha are included within the settlement envelope for Emyvale to enable housing to be developed.
- The lands were previously zoned for development and planning permission exists on a portion of the lands. The site is within walking distance of the village and close to all community facilities and amenities.
- Permission has already been granted for four units on the front portion of the lands. Services are available and located along the public road to the site.
- The site is level, has no access issues and is located 0.5 km from Emyvale main street, a village that is well catered for in terms of local facilities and public transport routes.

Chief Executive's Response

Whilst the front portion of the subject lands could be considered an infill opportunity and has been included within the settlement envelope, the extent of undeveloped lands available for residential development within the village footprint are sufficient to meet the projected population increase in Emyvale over the plan period, and therefore the additional lands are not required.

Chief Executive's Recommendation

No amendment recommended.

Submission No	Name/Organisation	Map Booklet Page No
78	Martin Conroy c/o Stephen Ward Town Planning & Development Consultants Ltd	78

Summary of Submission & Issues Raised

- Requests that the lands outlined on attached map (3 ha) be included in the Emyvale village envelope and are designated, as appropriate, for low density residential use and as appropriate for a nursing home.
- Permission was granted previously on these lands for a nursing home and 26 residential units.
- The site is contiguous to the existing built up area and its inclusion with the settlement envelope would consolidate the settlement and make effective use of serviceable lands.
- The lands are to the rear of an existing housing development and are not suitable for a viable farm unit and as such would represent a sustainable extension to Emyvale village.
- The site is near existing social and community infrastructure and to local places of employment.
- Designating the lands for low density residential development will ensure population expansion occurs in line with the projections of the Draft Plan, would offer an alternative to one off housing in the countryside and support the provision of services within Emyvale.
- Requests that nursing homes are permitted for in Tier 4 settlements such as Emyvale as there is no such facility in north Monaghan, but transport links and services are already available.

Chief Executive's Response

It is acknowledged that the subject lands are close to the village centre and contiguous to the settlement envelope, however there are sufficient undeveloped lands within the village envelope which can provide for the projected population growth over the plan period and as such to expand the village boundary to include these lands is unjustified. Furthermore, a significant portion of these lands are located within a flood risk area.

It is acknowledged that the size, location and characteristics of Emyvale would lend itself suitable for the development of a nursing home, however not all of the Tier 4 settlements would be considered appropriate for nursing home type development. Section 15.13.6 sets out the guidelines and policy under which a nursing home development will be considered and there is provision within Policy RDP21 'to generally require' these services be located within the Tier 1-3 settlements. This policy does not preclude such developments being considered in Tier 4 settlements like Emyvale where a

sustainable and proper planning rationale can be set out. To clarify this further it is considered additional text should be included in Section 15.13.6.

Chief Executive's Recommendation

It is recommended to include additional text in Section 15.13.6 to state;

'Nursing home services will be considered on lands adjacent to existing settlements and villages whereby a sustainable and proper planning rationale can be set out for the location proposed'.

Inniskeen

Submission No	Name/Organisation	Map Booklet Page No
21	PJ& EJ Doherty c/o PDES Chartered Planning Consultants	79

Summary of Submission & Issues Raised

- Submission requests that the settlement envelope of Inniskeen be amended to include all of the subject lands totalling 4.29 ha at Edenamo.
- The site is partially contained within the existing settlement envelope and has a detailed planning history for housing developments.
- Substantial site works have been carried out on the subject lands including site clearance, completion of foul and storm drainage connections, site services and the laying of a 250m sewer line along the roadside at a cost of €78,000.
- Submission suggests that the Core Strategy and subsequent populations allocation/housing land requirement should align with objective 3 (a) of the NPF and that the assumed county growth rate of 1.04% is too low. A recommended assumed growth rate should be in the order of 1.6% which would yield a more accurate population target for Inniskeen.
- Submission states that significant portion of lands within the settlement is unsuitable due to flood risk, use for recreation and amenity purposes and proximity to Protected Structures. It is suggested that a figure of 4.6 ha of lands within the envelope are not suitable for development. The subject lands offer an appropriate alternative for the sustainable development of Inniskeen.
- The extension to the envelope proposed equates to 1.8 ha which is a nominal increase on Draft Plan envelope and the subject lands meet criteria set out in Appendix 3 of the NPF which advocates the identification of “serviced lands” for priority.
- Submission states that the suggested amendment to include the subject lands is consistent with objective 2.1 of the Draft Plan to provide for low density development of residential units on suitable sites within the designated settlement to provide an alternative house type choice.

Chief Executive's Response

It is acknowledged that although some of the subject lands are contiguous to the village centre, the additional lands sought to be included are located on the edge of the settlement and there are sufficient undeveloped lands within the village envelope, closer to the village core, which can provide

for the projected population growth over the plan period. The core strategy and population projections set out in the Plan set out a modest growth for the towns and villages of County Monaghan and any increase in these projections is considered unjustified. The objectives of the Core Strategy to increase the population of County Monaghan living in urban areas from 37% to 41% accords with the principles as set out by the NPF. Furthermore, the population projections as set out in the Plan are in accordance with those prescribed by the 'Implementation Roadmap for the National Planning Framework' published in July 2018.

Chief Executive's Recommendation

No amendment recommended.

Smithborough

Submission No	Name/Organisation	Map Booklet Page No
80	H. Boylan & Sons c/o CS Pringle	80

Summary of Submission & Issues Raised

- Submission requests that plot of land measuring 2.07 ha at Mullaghduff is included in the settlement envelope for future residential development.
- Lands are located within walking distance of all village amenities, the site is viable and sustainable.
- Existing lands within the development limit have not been developed resulting in the stagnation of the village.
- Extension of development limit is consistent with objectives of NPF to deliver 40% of new homes within urban settlements and facilitating additional residential development in settlements will reduce the demand for one off housing in the countryside.
- Owners of site are established developers with proven track record associated with the development of The Meadows in Smithborough.
- An Indicative layout plan/map for a residential development of 29 units has been submitted for illustration purposes.

Chief Executive's Response

The location of the lands is sequential to the existing settlement and would extend the urban envelope north rather than in a linear pattern along the N2 which is currently the case. However, an existing residential development to the east of the village has potential to further expand which is considered a more sustainable and appropriate area for development within the current footprint of the settlement. There is no justification for expanding the settlement boundary given the extent of greenfield lands which are available for development within the existing settlement envelope.

Chief Executive's Recommendation

No amendment recommended.

Tydavnet

Submission No	Name/Organisation	Map Booklet Page No
23	Bride Square Properties c/o PDES Consultants	81

Summary of Submission & Issues Raised

- The submission refers to a plot of land measuring 1.29 ha in Tydavnet Village
- Submission requests an amendment of policies under Section 2.7.1 in respect of residential developments for Tier 5 and Tier 6 settlements so that serviced/serviceable lands which are located adjacent to a village focal point can be developed.
- The lands detailed on attached map are within the Tier 5 settlement of Tydavnet and the policy objectives which encourage strengthening of rural communities like Tydavnet are supported, but there is a long-standing unfinished housing development which has been stalled for more than seven years which is sterilising any further development in the village. Section 2.7.1 needs to be amended to allow for alternative developers to provide much needed residential units in the Tier 5/Tier 6 settlements.

Chief Executive's Response

It is considered that Section 2.7.1 and the relevant policies and objectives of the Plan provide for measured and sustainable growth of the Tier 5 and Tier 6 settlements. There are no constraints to any landowner or potential developer where it can be demonstrated that there is demand for the proposed development within these settlements.

Chief Executive's Recommendation

No amendments recommended.

Supplementary Amendments – Explanatory Note

The supplementary amendments are being recommended following internal consultation of the Draft Plan and where notable omissions and/or typing errors were identified

Supplementary Amendments		
Chapter	Section	Amendment
Chapter 1	1.12 'Policy Context'	<p>Insert into Table;</p> <p>Strategy for the Future Development of National and Regional Greenways (July 2018); This strategy aims to assist in the strategic development of nationally and regionally significant Greenways in appropriate locations constructed to an appropriate standard in order to deliver a quality experience for all Greenways users. It also aims to increase the number and geographical spread of Greenways of scale and quality around the country over the next 10 years with a consequent significant increase in the number of people using Greenways as a visitor experience and as a recreational amenity.</p>
Chapter 2	2.4.1 'Regeneration of Existing Lands'	<p>Amend first paragraph; The regeneration of land (as defined by the Urban Regeneration and Housing Act 2015).</p> <p>Amend last sentence in second paragraph; Having regard to this target, it is considered appropriate that up to 20% of the population growth could be provided for through development of these sites.</p>
	Table 2.5 'Core Strategy Table 2'	Insert amended 'Core Strategy Table 2' as shown below on Page 177.
Chapter 3	3.2.2 'Residential Amenity'	<p>Insert additional text as follows; This type of development is permissible on lands zoned as 'Proposed Residential B' within the five towns and within those Tier 4, 5 and 6 settlements which have public foul drainage systems</p>
	Section 3.5 'Urban Housing Policy' Policy HSP4	<p>Insert additional text as follows; Policy HSP4: To direct multiple residential developments to those settlements identified in the Core Strategy and to require that the scale of such development is in accordance with the growth projected within that specific settlement, except where there is otherwise demonstrable need.</p>
Chapter 4	4.7.2 'Tourism Policies' Policy TMP5	<p>Insert/delete text as follows; To support the continued development of the Ulster Canal project and the expansion of the Greenway along the route of the Canal from Clones to Armagh through County Monaghan.</p>

Chapter 5	5.4 ‘Education facilities’	<p>Insert text as follows;</p> <p>5.41 Third level education</p> <p>The provision of high quality third level education facilities in County Monaghan is critical to retaining the youth population who might otherwise leave the county to attend third level institutions elsewhere. It also benefits local employers and industry by providing skilled graduates for the job market. The enhancement of third level facilities provides scope for effective engagement between institutions and employers through access to research, development and innovation.</p> <p>CFP5 To facilitate, promote and encourage the development of third level education facilities in County Monaghan</p> <p>Note that all other policies in Chapter 5 to be renumbered accordingly.</p>
Chapter 5	5.9 ‘Cycling and Walking’	<p>Remove ‘urban’ from end of text on page 82.</p> <p>Insert/Delete text as follows;</p> <p>In addition they are frequently used as a leisure activity for recreational purposes with the increasing number of greenways and walking festivals nationally, an indicator of how much of a tourism attraction these types of facilities area There has been an increase in the number of greenways and walking festivals nationally demonstrating that these types of recreational facilities can make a significant contribution to the tourism offering in County Monaghan.</p> <p>Figure 5.0 Amend map title; ‘Phase-2 The proposed Ulster Canal Greenway Network Route Map’.</p> <p>Policy CFP9 To promote and facilitate the development of walkways and cycleways and recreational routes in appropriate locations throughout the County as identified in the to deliver the objectives of the County Walking and Cycling Strategy.</p> <p>Policy CFP10 To promote and encourage the development of looped walks and cycleways in accordance with the Smarter Travel Policy and to protect established routes from development which would adversely impact upon them.</p> <p>Policy CFP11 To develop, in conjunction co-operation and consultation with adjoining local authorities and cross border bodies, an extension of the Monaghan Greenway along the Ulster Canal including along disused railway lines sections of the Ulster Canal Greenway Network to connect the main urban centres throughout central Ulster</p> <p>To include new Policy CFP14 (and re-number subsequent policies accordingly- CFP14-16 in Draft Plan become CFP15- CFP17)</p>

		To protect established/historic railway corridors and other disused transport infrastructure routes throughout the County primarily for strategic infrastructure provision and recreational development. Where these corridors have already been compromised by development, adjacent lands which could provide opportunities to bypass such an impediment and reconnect these routes for amenity purposes shall be protected for this purpose
Chapter 6	Policy HLP7 (re-number subsequent policies thereafter)	Insert New policy after Section 6.4.1 'To promote the development of Kavanagh Country as a cultural destination'.
Chapter 6	16.17.1 Insert Policy BHP10(in MCDP 2013-2019)	Insert text; The Council aims to conserve the built fabric of the Ulster Canal, Great Northern Railway, historic mills and other industrial heritage structure throughout the county and planning permission will be required for their removal or alteration.
Chapter 6	6.19 'Historic Houses and Designed Landscapes'	Add Lough Bawn House to list of Historic Houses
Chapter 7	Section 7.18 Greenways	The Department of Transport, Tourism and Sport published A Strategy for the Future Development of National and Regional Greenways in July 2018 with an objective to develop new Greenways in a way which can transform more rural areas around the country, provide a wonderful experience for visitors and locals, and contribute to the health of the nation. The consideration of the policies and objectives of these guidelines will be required in any proposal to develop expand or develop Greenways.
Chapter 7	Paragraph 7.1 'National & Regional Transport Policy Context'	Insert/remove text as follows; The draft National Planning Framework specifically references the N2/A5 (Clontibret to Tyrone/NI Border) roads project. It is considered that this route should be prioritised given its strategic importance and the lack of any direct rail infrastructure serving significant urban areas in the northwest along the route of the N2/A5. It is considered that this route should be prioritised to full motorway standard given its strategic importance and the lack of any direct rail infrastructure serving significant urban areas in the northwest along the route of the N2/A5. Insert revised Table 7.1, shown below.
	Table 7.1 'Remaining Un-realigned Sections of National Roads'	Insert/delete text as follows; Table 7.1 sets out the national road projects that will be advanced in partnership with the TII. They represent the remaining un-realigned sections of National roads and table 7.2 outlines the strategic national road proposals for the county. These national road projects that form key routes and linkages with

	<p>Table 7.2 ‘Strategic National Road Proposals for Co. Monaghan’</p> <p>Figure 7.2 ‘Scheme Ref 1 Coracrin- Emyvale Road Re-alignment’</p> <p>Figure 7.3 ‘Tullybryan Realignment’</p> <p>Table 7.5 ‘Roads proposals for the five towns in County Monaghan’</p>	<p>other development centres, sea-ports and airports will be advanced in partnership with Transport Infrastructure Ireland.</p> <p>Insert revised Table 7.2, shown below</p> <p>Delete Figure 7.2.</p> <p>Delete figure 7.3.</p> <p>Remove 5th bullet point; Widening of Annahagh Lane to facilitate residential development.</p>
Chapter 7	<p>Section 7.19 ‘Ulster Canal’ CWP1</p> <p>CWP2</p> <p>CWP3</p>	<p>To promote and facilitate the development of walkways and cycleways and recreational routes in appropriate locations throughout the County as identified in the to deliver the objectives of the County Walking and Cycling Strategy and any subsequent strategy document.</p> <p>To promote and encourage the development of looped walks and cycleways in accordance with the Smarter Travel Policy and to protect established routes from development which would adversely impact upon them</p> <p>To develop, in conjunction co-operation and consultation with adjoining local authorities and cross border bodies, an extension of the Monaghan Greenway along the Ulster Canal including along disused railway lines sections of the Ulster Canal Greenway Network to connect the main urban centres throughout central Ulster. Changes suggested as we may not be delivering the next phase in conjunction with other local amenities.</p>
Chapter 8	Table 8.4 ‘Landfills’	Extend the reference in this table to Killycard (near Malone’s Lake)

Chapter 8	Section 8.7 'Intensive Agriculture'	Additional text; However maximum benefit can only be achieved if using a dual tariff meter and user benefitting from cheaper night rate electricity.
Chapter 8	Section 8.39 'Noise'	Insert new text; The impact of noise pollution is an important consideration in assessing all new development proposals as it can impact on people's quality of life and health. The Environmental Noise Regulations 2006 give effect to EU Directive 2002/49/EC relating to the assessment and management of noise pollution. A Noise Action Plan is in place by the Council for major roads within County Monaghan carrying more than 3,000,000 vehicle passages per year.
Chapter 9	Table 9.1 'Vision'	Include in SH03 'whilst protecting the significant built archaeological heritage aspects of Clones town' .
Chapter 9	All	Amend Table as numbering out of sync.
Chapter 9	9.4 'Derelict Sites' Section 9.5 'Vacant sites' 9.6 'Regeneration & development of Vacant Land' Section 9.8 'Housing'	<p>Insert additional points in second paragraph as follows;</p> <ul style="list-style-type: none"> - Acquire land by agreement or compulsorily in the functional area - Issue an Endangerment notice in respect of a Protected Structure specifying works to be carried out to prevent a Protecting Structure from becoming or continuing to be endangered. <p>Insert new table 9.6 showing the zoning categories identified as Regeneration Lands and Table 9.7 identifying the zoning categories relating to residential lands which the Vacant Site Levy applies to.</p> <p>Remaining tables re numbered accordingly- Table located at the end of supplementary amendments</p> <p>Insert the following at the end of Section 9.6</p> <p>Along with a proactive stance of Local Authority to identify land/areas in need to regeneration intervention e.g Dublin Street Plan & LAAP in Monaghan</p> <p>Insert the following amendments to Section 9.8.</p> <p>UD09</p> <p>To implement an Active Land Management Strategy in relation to vacant land within County Monaghan and to maintain and update as required a Vacant Sites Register to ensure efficient and sustainable use of the County's lands resources in accordance with the provisions of the Urban Regeneration and Housing Act 2015</p>
Chapter 9	Section 9.18 Tier 4 Village Plans Table 9.16	To promote and facilitate limited residential development commensurate with the nature and scale of the village, utilising brownfield and infill opportunities in order to regenerate and consolidate the village in compliance with the Core Strategy, except where there is otherwise demonstrable need

	<p>9.18 V02</p> <p>Replace current VIL2 with the following new policy</p>	<p>To promote and facilitate limited residential development commensurate with the nature and scale of the village, utilising brownfield and infill opportunities in order to regenerate and consolidate the village in compliance with the Core Strategy, except where there is otherwise demonstrable need</p> <p>Policy VIL1</p> <p>To require applications for residential development within these settlements to demonstrate the following:</p> <ul style="list-style-type: none"> a) The developer has provided evidence to the satisfaction of the planning authority that there is demand for the proposed residential development taking account of the extent, nature and status of extant permissions for residential development, unfinished housing developments and vacant residential properties in the settlement. b) The proposal contributes to the sequential development of the settlement of land from the centre outwards and/or represents an infilling of the existing settlement envelope. c) The scale and density of the development accords with the character of the village The application comprises a maximum of 25% of the residential units required to satisfy the housing demand in the settlement for the plan period. d) It can be demonstrated to the satisfaction of the planning authority that the application does not comprise lands that are in the same ownership or have been disposed of from another land parcel, upon which planning permission for residential development has already been granted and of which more than 25% of the units remain unoccupied or undeveloped. d) The quantum and location of the proposal must be in accordance with the provisions of the Core Strategy set out in Chapter 2. <p>Policy VIL2</p> <p>Notwithstanding the provisions of Policy VIL1 and Section 15.7, and taking into account the objectives of the ‘Rebuilding Ireland’ Strategy to address the shortage of housing, the planning authority may favourably consider proposals for social housing developments which are outside the defined settlement limit where a clear demonstrable need can be proven, and where the lands are contiguous to the settlement limit and can be adequately serviced.</p> <p>Current Policy VIL2 becomes VIL3</p>
<p>Chapter 10</p>	<p>MPO8 ‘Ulster Canal’</p>	<p>To support the re-opening of the Ulster Canal in Monaghan Town and any complementary developments along the route of the Ulster Canal, including the proposed Ulster Canal Greenway network.</p>

	Section 10.10.2 'Monaghan Greenway'	Additional text to end of paragraph; Phase 2 of the Ulster Canal Greenway network will extend the Monaghan Town Greenway by a distance of 22km to the villages of Smithborough and Middletown. Subsequent phases of the Ulster Canal Greenway Network will connect Monaghan Town to the main urban centres throughout central Ulster.
Chapter 11	Map CKDP1	Amend mapping /zoning error on site at Drummond Otra abutting R178 and Lisanisk lane from Existing Commerical to Existing Residential – insert map
Chapter 12	CBO7 (P.238)	Revised objective as follows: To support the recommendations of the CHL Options & Appraisal Report on Hope Castle and its annex buildings to provide a pathway to the delivery of a destination tourism facility at Lough Muckno.
Chapter 13 'Settlement Plan for Clones'	13.3 'Regeneration of Clones' 13.4 'Strategy & Vision' Table 13.2 (P.250) 13.6 'Town Centre' 13.7 'Retailing' 13.11 'Tourism' 13.11.1 'Ulster Canal' 13.11.1 Policy CPO7	Insert as last sentence in paragraph; The Clones Regeneration Partnership was replaced with the Clones Town Team in October 2017. The Town Team have now developed a town plan for Clones. Housing land zoned = 11ha (not 13) Replace Scoil Croi Ro Naofa with St Tiarnachs Remove 'Clones Courthouse still allowing for monthly court sitting' There are two filling stations on the southern eastern end of the town Include reference to peace link in last sentence on sport related attractions Furthermore, the proposed Ulster Canal Greenway Network would see the town connected to the main urban centres throughout central Ulster. The Canal Stores restored by Clones Development Society signals the potential for regeneration the re-opening of the canal would offer. It shall remain an objective of Monaghan County Council to support the re-opening of the Canal in Clones due to its potential to improve the economic development and tourism potential for the town, and to support any other complementary developments along the route of the Ulster Canal, including the development of the proposed Ulster Canal Greenway network.

	<p>13.12 ‘Recreation & Amenity’</p> <p>13.12.1</p>	<p>Encourage and accommodate the reopening of the Ulster Canal, and any other complementary developments along the route of the Ulster Canal including the development of the proposed Ulster Canal Greenway network, and the provision of a marina at an appropriate location within the town as it provides a vehicle for regeneration.</p> <p>Insert/delete text; Monaghan County Council has plans in place to provide provided a new linear park adjacent to the Ulster Canal. This development will provide access from the R212 to the Town Park at Cara Street. The provision of the linear park in this location will add to the quality of life of citizens and to the attractiveness of the town as a whole. It can also connect into any future phased development of the Ulster Canal Greenway Network, which is proposed to connect the main urban centres throughout central Ulster.</p> <p>Change name of Town Park to Seamus McCabe park</p>
<p>Chapter 15</p>	<p>15.27.1 ‘Sight Distances’</p> <p>Table 15.5 (P.311)</p> <p>15.27.1 ‘Sight Distances’</p>	<p>Delete/insert text: Sight Distances Minimum Visibility Standards for a new access or intensification of an existing Access onto Non Urban Roads. The minimum visibility standards as set out in table 15.5 below shall apply on non-urban roads.²⁸ These requirements are in accordance with National Standards as set out in TII publications DN-GEO-03060 ‘Geometric Design of Junctions’ and DN-GEO-04031 ‘Rural Road Link Design’.</p> <p>Remove table and replace with new table 15.5 as shown in P.71 of CE Report.</p> <p>Delete text; * A relaxation of a 2.4 metre (X Distance) set back may be applied on Class 2 & 3 local roads where it is of the opinion of the Planning Authority that a reduction is warranted due to the assumed reasonable road speed.</p> <p>Insert text; The distance back along a minor road or direct access from which full visibility is measured is known as the ‘X’ distance. The ‘Y’ distance is the distance a driver can see in each direction along the major road from the specified set-back (‘X’).</p> <p>Delete/insert Text; In difficult exceptional circumstances the standards set out in Table 15.5 may be reduced where it is demonstrated by way of a survey and report completed by an independent suitably qualified professional, that a reduced standard would be appropriate and safe. In these circumstances the required Y distance shall be calculated on the basis of the 85% percentile speeds on the applicable road.</p>

	<p>15.27.4 'Visibility'</p> <p>15.27.5 'Stopping Sight distance'</p> <p>Appendix 12</p>	<p>Delete text; The sight distances shall be measured to the near side edge of the carriageway in both directions from a height of 1.05m – 2.0m above the ground and from a point 2.4m/3.0m/4.5m (see Table 15.5) back from the edge of the road.</p> <p>Delete footnotes; 29 Design Manual for Roads and Bridges (DMRB) 30 Range is to allow for vehicle type (car/lorry) and classification of public road (national road, local road, etc, Refer to 19.0)</p> <p>Delete/Insert text; Forward visibility depends on the same factors as 'Y' distance (as calculated in the DMRB requirements or for accesses on non urban roads shown in Table 15.27 and in DMURS for accesses onto to urban roads. and are calculated as per TII requirements for accesses onto non-urban roads (See Table 15.5) and as per DMURS for accesses onto urban roads.</p> <p>Delete/insert text; Stopping sight distances will depend on the same factors as 'Y' distance (as calculated in the DMRB requirements or for accesses on non urban roads shown in Table 15.27 and in DMURS for accesses onto to urban roads. and are calculated as per TII requirements for accesses onto non-urban roads (See Table 15.5) and as per DMURS for accesses onto urban roads. Update Appendix 12 'Access details'</p>
<p>Chapter 15</p>	<p>15.7.2</p>	<p>Layout & Design of Houses The publication 'Quality Housing for Sustainable Communities' is an excellent guidance document for both private and social housing development and should be applied to all housing designs. Housing design should aim to achieve the standards set out in Table 5.1 of these guidelines (Appendix X) as a minimum unless requirements to accommodate older people, disabled people and others with special needs are necessary.</p>
<p>Chapter 15</p>	<p>15.7.5 'Layout and Design of Apartments'</p>	<p>Reference to Apartment Guidelines to change from 2015 to 2018.</p>
<p>Chapter 15</p>	<p>15.17.2 'Residential Dwellings and Agricultural buildings'</p>	<p>Insert the following text into the 3rd sentence in this section; Where it is proposed to site a dwelling within 100m of an existing farm building within County Monaghan.</p> <p>Insert the following footnote for the purposes of clarity; An agricultural building is a building used or last used for agricultural purposes or activity including the keeping of livestock, the storage of farm equipment, or any slurry or agricultural waste but excluding any field based holding pens, cattle crushes or sheep dips etc</p>

<p>Chapter 15</p>	<p>New Paragraph 15.29</p>	<p>Insert new paragraph 15.29 (omission from 2013-2019 Plan, with updated text)</p> <p>15.29 Pedestrian Footpaths Where a development is proposed within or adjacent to the defined limit of a town or village, the developer shall be required to provide a pedestrian footpath along the entire site frontage. In addition, where it is considered that the proposed development would result in significant traffic movements (i.e. developments involving five or more dwelling or equivalent), it shall be a requirement of the developer to provide a pedestrian footpath and public lighting which links the development to the existing footpath network or the nearest community/social facility within the settlement, as considered appropriate. The detail and specification of the footpath and lighting shall be agreed with the planning authority but shall normally comply with the standards identified by TII. The planning authority may accept a reduced width of the footpath in accordance with TII to be provided in circumstances where this would allow for the development and expansion of the settlement in accordance with Policy RDP5 the Monaghan County Development Plan 2019-2025 (Section 15.7.8 Tier & 6 Settlements)</p> <p>The Planning Authority may accept a full financial contribution for the provision of this infrastructure where the authority considers that this is the appropriate mechanism.</p>
<p>Chapter 16</p>	<p>Insert new Section 16.2 ‘Monitoring & Review’</p>	<p>Taking into account the objectives of the ‘Rebuilding Ireland’ Strategy to address the shortage of housing, it is considered prudent that the two-year review focuses on how the strategic objectives of the Monaghan County Development Plan 2019-2025 for sustainable population growth in line with the Core Strategy are being achieved including the delivery of residential development.</p> <p>Accordingly, Monaghan County Council will monitor residential developments under construction, those with the benefit of planning permission and those currently in the planning system, to assess the supply of housing units on zoned Proposed Residential lands.</p> <p>Active Land Management is a key tool to securing the implementation of the objectives of the plan. The use of Vacant Sites and Derelict Sites Legislation as set out in the Urban Regeneration and Housing Act 2015 should be utilised in this regard.</p> <p>In the event that lands zoned as Proposed Residential A or Proposed Residential B are not developed and/or planning permissions secured for residential development within two years of adoption of the plan, consideration should be given to rezoning parcels of</p>

		land zoned Strategic Residential Reserve to Proposed Residential, where these are sequential and serviceable and where residential development can be delivered in lieu of Proposed Residential lands not actively progressed. In order to comply with the Core Strategy this will require rezoning the equivalent quantum of Proposed Residential Lands as Strategic Residential Reserve.
Appendices	<p>Section 4</p> <p>Section 9 (a)</p> <p>Section 10 (a)</p> <p>Section 12</p> <p>Section 21</p> <p>Section 22</p> <p>Section 23</p> <p>Section 24</p> <p>Section 21 renamed 25</p>	<p>Insert Updated Strategic Flood Risk Assessment</p> <p>Omit Bonnan Bui from RPS Clones</p> <p>Insert Glaslough ACA</p> <p>Amend table to reflect TII standards</p> <p>Dublin Street Regeneration</p> <p>Dublin Street LAP</p> <p>Retail Strategy</p> <p>Table from Quality Housing and Sustainable Communities</p> <p>Draft Consultation List</p>

Table 2.5 Core Strategy Table 2

Tier in Settlement Structure	Location	HLR* 2013-2019 CDP	HLR* 2019-2025 (excluding 50% Market Choice)	90% @ 20 units/ha Average Density	10% @ 10 units/ha Average Density	HLR* 2019-2025 (including 50% Market Choice)
Tier 1	Monaghan Town	47	29.4	24.1	5.3	44.1
Tier 2	Carrickmacross	19	17.3	14.1	3.1	25.9
	Castleblayney	18	10.7	8.7	1.9	16
Tier in Settlement Structure	Location	HLR* 2013-2019 CDP	HLR* 2019-2025 (excluding 50% Market Choice)	80% @ 20 units/ha Average Density	20% @ 10 units/ha Average Density	HLR* 2019-2025 (including 50% Market Choice)
Tier 3	Clones	16	7.6	5.5	2.1	11.4
	Ballybay	8	6.9	5	1.9	10.4
Tier in Settlement Structure	Location	HLR* 2013-2019 CDP	HLR* 2019-2025 (excluding 50% Market Choice)	100% @ 15 units/ha Average Density	-	HLR* 2019-2025 (including 50% Market Choice)
Tier 4	Villages	24.5	17.7	17.5	-	-
Total	County Monaghan	132	89.3	-	-	134

*HLR – Housing Land Requirement

Table 7.1 Remaining Un-realigned Sections of National Roads

Road	Route
N54	Tullygrimes to Annaghervy (Tullybryan) realignment
N54	Annaghervy to Magherarney realignment
N54	Drumully – Co.Fermanagh realignment
N12	Coolshannagh – Tyholland realignment
N12	Tyholland – Co Armagh Border realignment

Table 7.2 Strategic National Road Proposals for Co. Monaghan.

Scheme Ref	Road	Route	Timeframe
1	N2	Coracrin-Emyvale Road Realignment 3.5km	Tender Stage
2 1	N2/ A5	Clontibret – Northern Ireland Border	At design stage
3 2	N2	Ardee – Castleblaney Road Upgrade	At design stage
4 3	N2/N54	Monaghan Town Northern link Route Road	At outline stage
5 4	N54	Clones By Pass	At outline stage
6 5	N53/N2	Dundalk Road-Tullyvin Roundabout Road Link	At outline stage
6	N53	Ballynacarry Bridge Replacement	At outline stage

Table 9.6 - Applicable land use zoning categories identified as Regeneration land in respect of the Vacant Site Levy (Urban Regeneration and Housing Act 2015)

Land Use Zoning Category	Land Use Zoning Objective
Strategic Residential Reserve	To protect lands that are considered strategic in location for future residential development.
Industry, Enterprise & Employment	To provide for new industrial, enterprise and employment generating development and to facilitate expansion of existing industrial and employment generating enterprises.
Existing Commercial	To provide for established commercial development and facilitate appropriate expansion.
Community Facilities & Services	To protect, provide and improve community, civic and educational facilities.
Recreation & Amenity	To protect and provide for recreation, open space and amenity.
Landscape Protection/ Conservation	To protect important landscape features within the towns from development that would detrimentally impact on the amenity of the landscape, on the natural setting of the town or on the natural attenuation offered by flood plains.
Flood Risk Areas	To apply the precautionary principle and require justification for development on these lands.
Local Area Action Plan	To establish strategic planning principles for each area including land use, infrastructure provision, layout, open spaces, linkages and design

Table 9.7 Applicable land use zoning categories identified as Residential land in respect of the Vacant Site Levy (Urban Regeneration and Housing Act 2015)

Land Use Zoning Category	Land Use Zoning Objective
Town Centre	To provide, protect and enhance town centre facilities and promote town centre strengthening.
Existing Residential	To protect and enhance existing residential amenities.
Proposed Residential A	To provide for new residential development and for new and improved ancillary services.
Proposed Residential B	To facilitate for serviced low density residential development in a structured and co-ordinated manner.
Strategic Residential Reserve	To protect lands that are considered strategic in location for future residential development.

Road Safety Impact Assessment

What is a Road Safety Impact Assessment?

A Road Safety Impact Assessment (RSIA) is a strategic assessment of the impact of different planning options for a new road, or for substantial modifications to an existing road, on the safety performance of the road network.

When is a Road Safety Impact Assessment required?

A RSIA is required for Major Schemes on the national roads which result in a substantial modification to the road network or where development requires a new junction /access on to a national road or modifications to an existing junction on to a national road.

Smaller projects will not generally require assessment but if there is any doubt the TII Roads and Tunnels Safety section should be consulted in order to determine the requirement for RSIA for each specific scheme. A RSIA is recommended for similar schemes on local and regional roads.

Who carries out the Road Safety Impact Assessment?

The RSIA is performed by the project design team. The RSIA team is a minimum of two people, one of which should be a road design engineer and the other, a road safety auditor. The RSIA team members must be approved by Monaghan County Council and the Head of the TII Road and Tunnel Safety section.

Road Safety Impact Assessment Process

Preparing to carry out a RSIA may take some time. It is advisable to start work on the RSIA prior to the submission of the planning application. Pre-planning consultations can determine if a Road Safety Impact Assessment is necessary. The RSIA is carried out at the initial planning stage of a project and it is continually revised throughout the design stages until the scheme is finalised. The safety performance of the existing road network is assessed by the RSIA team. The team examines the current road network in terms of a number of factors, including collision history,

traffic volumes and traffic flows. This analysis allows the team to estimate the impact that the proposed infrastructure project will have on the safety performance of the current road network. The RSIA team is presented with a number of planning options for a scheme. During RSIA, the team performs a comparative analysis of those planned options, which includes the existing situation at the site and a 'Do Minimum' alternative. This comparison is based on collision reduction and cost-benefit analysis.

In order to compare the proposed alternatives, the RSIA team assess the impact of each planning option on the existing road network in terms of collision performance. The evaluation of each alternative is based on a number of factors, some of which include:

- The scheme objectives
- Collision data
- Traffic surveys

A cost-benefit analysis is carried out as part of RSIA for each scheme option. This cost-benefit analysis calculates the various collision costs of the existing road network and the planned alternatives. The results of the cost-benefit analysis serve as another method for comparing alternative schemes.

The team use the results of RSIA to rank the proposals for the site in terms of their road safety implications. This ranking includes all of the planning options as well as the existing situation at the site.

Road Safety Impact Assessment Report

The RSIA team prepare a report that combines all the Road Safety Impact Assessments that have been completed throughout the design process. The final RSIA report must be submitted to Monaghan County Council and relevant overseeing organisation (TII for national roads). The TII Guidance PE-PMG-02001 Road Safety Impact Assessment lists all of the elements that must be addressed in the RSIA report.

Further information:

- TII Publications, PE-PMG-02005 Road Safety Impact Assessment Guidelines
- TII Publications, PE-PMG-02001 Road Safety Impact Assessment
- TII Publications, PE-STY-02003 Road Safety Impact Assessment Team Qualifications.
- Spatial Planning and National Road Guidelines for Planning Authorities (DoELG, 2012)
- Road Design Office, Monaghan County Council