



Oifig an
Rialaitheora Pleanála
Office of the
Planning Regulator

9 October 2020
Planning Office,
Monaghan County Council,
1 Dublin Street,
Monaghan,
H18 X982

Re: Proposed Variation No. 2 of the Monaghan County Development Plan 2019-2025

A chara,

Thank you for your authority's work in preparing Proposed Variation No.2 of the Monaghan County Development Plan 2019-2025.

In accordance with the provisions of section 31AM of the Planning and Development Act 2000, as amended (the Act), the Office is obliged to evaluate and assess development plans and variations of development plans in the context of certain statutory parameters including:

- Matters generally to be contained in a development plan (section 10) and, in particular, section 10(2)(n) in relation to climate change;
- Consistency with the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy for the Northern and Western Region (RSES);
- Ministerial guidelines issued under section 28;
- Ministerial policy directives issued under section 29, and,
- Such other legislative and policy matters as the Minister may communicate to the
- Office in writing.

The Office recognises that the review of the Monaghan County Development Plan occurred in tandem with the preparation of the NPF and the RSES, resulting in certain harmonies between the three documents.

Nonetheless, it is also acknowledged that the Planning and Development Act 2000, as amended (the Act), requires your authority to initiate either a variation or a review of the Monaghan County Development in accordance with section 11(1)(b) of the Act.

This variation presents an opportunity to further enhance alignment of the Monaghan County Development Plan 2019-2020 with higher level plans (NPF & RSES) and to avoid any potential or perceived conflict with the policies and designations set out in those higher plans.

Accordingly, the Office welcomes the proposed variation. This submission has been prepared to provide a high-level input to your authority in finalising the proposed variation of the plan.

1. Matters within the scope of section 10 and section 10(2)(n) of the Act

The proposed variation of the Monaghan County Development Plan 2019-2025 (the development plan) amends the existing written statement of the plan and more specifically includes an additional paragraph within Section 1.12 of the development plan which addresses the 'policy context'.

For clarity, the Offices acknowledges that there are no proposed changes within any other section of the plan, to any policy or objective of the plan nor to the maps associated with the plan.

As the variation is limited in content, the parent plan has been considered in order for the Office to be satisfied that the variation is adequate to ensure alignment with the higher level plans.

1.1 Section 10(2A) Core Strategy

The development plan sets a population target of 67,253 by 2025, which is consistent with the Implementation Roadmap of the NPF. The Office is also satisfied that the settlement hierarchy is reasonable and consistent with the national and regional policy context.

There are, however, a number of elements of the core strategy tables that require supplementary information and commentary in order to fully determine if the plan, and more specifically the housing land zoning requirement, meets the requirements of section 10(2A) of the Act, and if it is consistent with the national and regional development objectives.

In particular, the Office notes references in section 2.4 and section 3.2.2 of the plan which provide commentary on the density rates applied, and refer to practical, local constraints to the achievement of suitable yield on zoned lands.

This would appear to be informed by an analysis of the capacity of the lands zoned in the settlements. If this is the case, the evidence basis for the application of densities in table 2.5 (core strategy table 2) of the core strategy should be documented in the plan to fully demonstrate

compliance with the requirements of Section 10(2A) of the Act and guidelines issued by the Minister for Housing, Local Government and Heritage under section 28 of the Act.

Observation 1

The Office requests that the planning authority provide an evidence-based rationale for the application of lower densities within the housing land requirement as set out in the core strategy.

Observation 2

The Office requests that the planning authority provide additional detail on the land use zoning arising from the housing requirements identified within the core strategy and amend the core strategy tables, where relevant, to:

- I. Clearly identify the quantum of lands zoned for residential within each settlement, including zoning objectives Residential A, Residential B and Strategic Reserve.*
- II. Include an analysis and detail on any shortfall or excess of lands or housing capacity.*

The above detail should clearly demonstrate that the plan is consistent with the national and regional development objectives. In the event it transpires that there is an excess of lands zoned for the life of the plan, measures should be identified to address such an excess by either (a) prioritising /phasing of development, (b) alternative objectives or (c) discontinuing the objective (as per advices set out in Circular PSSP6/2010 and the associated 'Guidance Note on Core Strategies' November 2010 as issued by the Minister for Housing, Local Government and Heritage).

2. Consistency with National and Regional Policy

2.1 National Planning Framework (NPF)

As indicated in the foregoing, the Office considers that the development plan is substantially aligned with the National Strategic Objectives (NSOs) and Policy Objectives (NPOs) set out in the NPF.

One of the key themes of the NPF relates compact growth, and to this end, NPO3c is of specific relevance to County Monaghan. Therein the delivery of at least 30% of all new homes is required to be achieved within the existing built-up footprints of settlements.

The Office has reviewed the settlement plans and zoning maps as set out in Chapters 10-14 of the development plan and acknowledges, from a visual examination, that the majority of lands zoned for residential are located within the built-up footprint of settlement.

The Office also acknowledges that section 2.4.1 of the plan, in respect of regeneration of existing lands, identifies that up to 20% of the population growth can be provided on infill/brownfield/regeneration lands within the built envelope of existing settlements. This is reflected in table 2.4 (core strategy table 1) of the development plan.

Accordingly, the housing targets and land use zoning within the development plan appear to be capable of delivering 30%, or more, of new homes within the existing built-up footprint of the settlements. This proposed variation presents an opportunity to more clearly communicate how NPO3c will be achieved within the plan's written statement and core strategy.

Observation 3:

The planning authority is advised to set out in the plan how it intends to achieve 30% of all new homes within the existing built-up footprint of settlements in accordance with NPO 3c. This could be achieved by inclusion of additional text and/or a table in the development plan identifying the quantum of land zoned and expected housing yield both in and outside the existing built-up footprints of the settlements.

2.2 RSES Regional Policy Objectives (RPOs)

The Office recognises that the review of the Monaghan CDP occurred in tandem with the preparation of the RSES for the Northern and Western Regional Assembly (NWRA) area, which has resulted in significant alignment between both documents.

From a strategic perspective, the Office considers that there are two policies within the RSES which, by virtue of their strategic nature and ability to contribute to sustainable patterns of development, would warrant more specific reference to in the development plan. These include RPO 3.3 and RPO 6.27.

Observation 4

In order to further enhance the alignment between the Monaghan County Development Plan 2019-2025 and the NWRA RSES; the planning authority is advised that the core strategy should fully reflect the provisions of RPO 3.3 which seeks to deliver at least 20% of all new housing in rural areas on brownfield sites.

Observation 5

In order to further enhance the alignment between the Monaghan County Development Plan and the NWRA RSES; the planning authority is advised that there is merit in the inclusion of a specific policy within the plan to underscore and support RPO 6.27 of the RSES in relation to the preparation of a Local Transport Plan for Monaghan town.

2.3 General Terminology and References

The NWRA RSES has designated Monaghan town as one of eight 'Key Towns' in the region (section 3.4 refers) and, under section 3.9, has highlighted that Carrickmacross is a place of strategic potential that performs an important sub-regional function for employment, housing and services.

The development plan identifies Monaghan Town as a 'Tier 1 - Principle Town' and Carrickmacross together with Castleblayney are included in Tier 2 as 'Strategic Towns'. The internal growth allocations for Carrickmacross and Castleblayney are further nuanced to reflect their different baseline populations and functions.

Overall, the Office considers that the settlement hierarchy is evidence-based, logical and reflects the local socio-geographical features of the settlements within the county and is not inconsistent with the higher level plans.

Nevertheless, in making this variation there is an opportunity to enhance alignment between the terminology used in the RSES and the development plan. This could be achieved through the reference to the term 'Key Town' in respect of Monaghan town and reference to the RSES acknowledgement that Carrickmacross is a place of strategic potential that performs an important sub-regional function for employment, housing and services.

Observation No. 6

The Office advises that the hierarchy and policies in the development plan make reference to Monaghan as a Key Town and acknowledge that Carrickmacross is a place of strategic potential that performs an important sub-regional function for employment, housing and services.

3. Policy directives issued under section 29 of the Act

The Office confirms that no issues arise in this regard.

4. Other legislative and policy matters as the Minister may communicate

The Office confirms that no issues arise in this regard.

Summary

Accordingly, the Office broadly supports the proposed variation and has no specific recommendations to make under the provisions of section 31AM(3)(a) of the Act. The Office therefore urges your authority to finalise the proposed variation, having regard to the observations set out in this submission.

Your authority is required to notify this Office within 5 working days of the making of the variation and send a copy of the written statement and maps as made, in accordance with section 31AM(6) of the Act.

Please feel free to contact the staff of the Office in the context of your authority's responses to the above, which we would be happy to facilitate. Contact can be initiated through the undersigned or at plans@opr.ie.

Yours sincerely,



Anne Marie O'Connor

Deputy Regulator and Director of Plans Evaluations, Office of the Planning Regulator
