



Comhairle Contae Mhuineacháin
Monaghan County Council

MONAGHAN COUNTY DEVELOPMENT PLAN 2025-2031

**CHIEF EXECUTIVE'S REPORT ON SUBMISSIONS
RECEIVED ON DRAFT DEVELOPMENT PLAN
CONSULTATION PROCESS**

MARCH 2025

Table of Contents**Page Number****Part One**

<u>Introduction</u>	1
---------------------	----------

Part Two

<u>Office of the Planning Regulator Submission</u>	11
<u>Northern and Western Regional Assembly Submission</u>	56

Part Three

<u>Prescribed Bodies Submissions</u>	67
--------------------------------------	-----------

Part Four

<u>Town Submissions</u>	
<u>Monaghan Town</u>	200
<u>Carrickmacross Town</u>	341
<u>Castleblayney Town</u>	398
<u>Clones Town</u>	435
<u>Ballybay Town</u>	452

Part Five

<u>Village Submissions</u>	
<u>Tier 4</u>	469
<u>Tier 5 and 6</u>	517

Part Six

<u>General Submissions</u>	526
----------------------------	------------

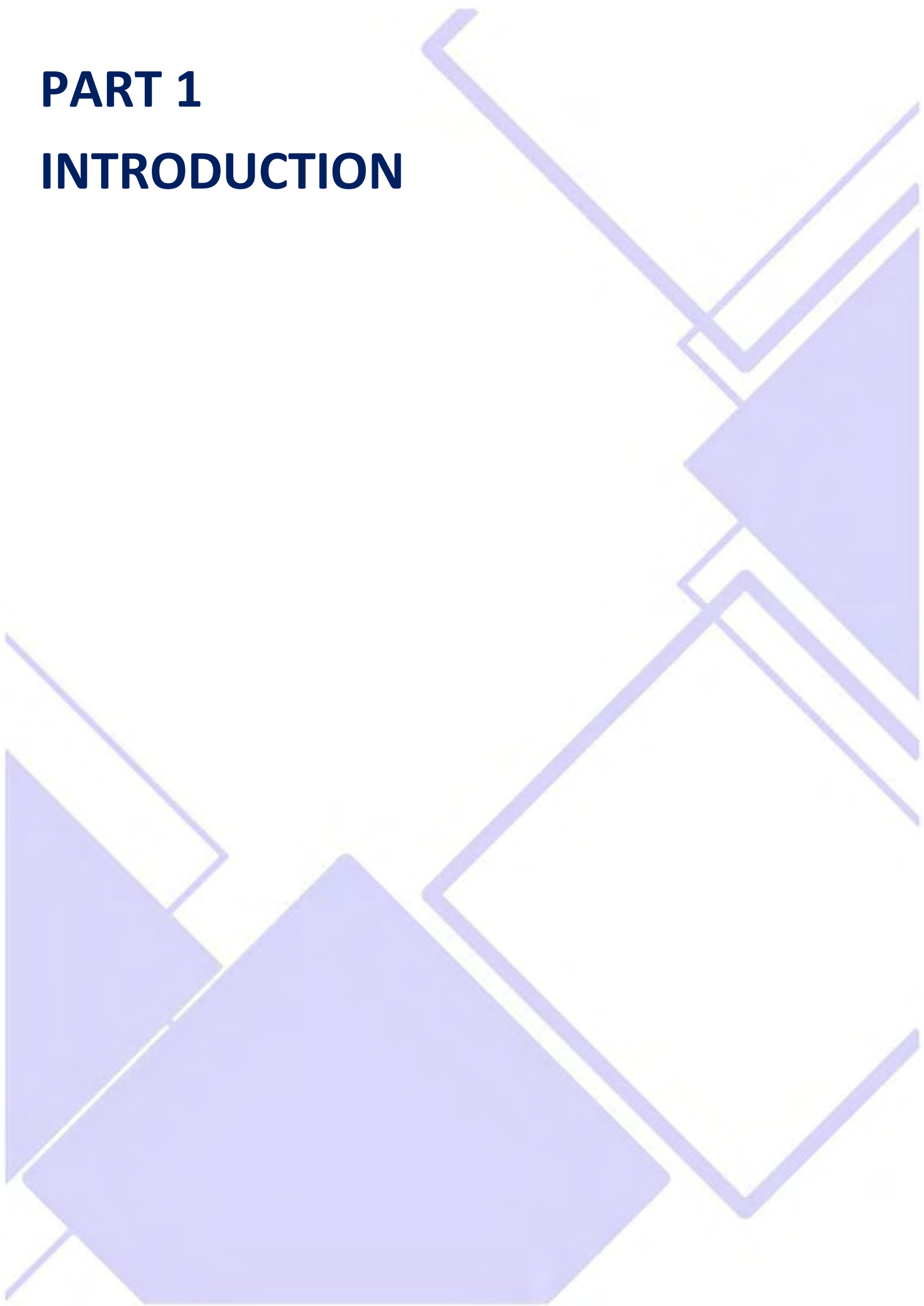
Part Seven

<u>Supplementary Map Amendments</u>	604
-------------------------------------	------------

Appendices

PART 1

INTRODUCTION



1.0: Introduction

The preparation of the Development Plan is one of the most important functions of the Council. The Development Plan sets out the land use infrastructure, amenity and development objectives and policies of the County's planning authority for a six-year period and consists of a written statement of policies and objectives, and a series of maps. The Plan underpins the economic and social progress of the County as a whole and sets out the long-term vision for its future.

On the 11th of May 2023 Monaghan County Council gave notice of its intention to review the existing Monaghan County Development Plan 2019-2025, and to prepare a new Monaghan County Development Plan 2025-2031 for the functional area of Monaghan County Council.

Pre-Draft Development Plan consultation was undertaken over an eight-week period from the 11th May 2023 to the 7th July 2023. A Strategic Issues & Options Paper set out the strategic issues affecting the County and was used to stimulate debate and facilitate public involvement at this early stage of the development plan process. The Pre-Draft Consultation process attracted sixty-six submissions from a wide range of public bodies, other organisations and individuals. The comments received covered a broad range of issues within the topics of Environmental Assessment & Monitoring, Settlement Strategy, Housing Strategy, Climate Change, Environment & Heritage, Economic Activity, Infrastructure & Services, Community Services/Facilities, as well as a range of other issues that did not fall within the foregoing topics.

A Draft Plan was considered and agreed by the Elected Members in September 2024 and was placed on public display on 5th September 2024 until 14th November 2024.

1.1: Purpose of the Chief Executive Report

The purpose of the Chief Executive's Report is to report on the outcome of the consultation process on the Draft Monaghan County Development Plan, which was on public display from 5th September 2024 until 14th November 2024.

In accordance with Section 12(4)(a) of the Planning and Development Act 2000 (as amended), the Chief Executive, as part of the Development Plan process, is required to prepare a report on the submissions and observations received from the public consultation process of the Draft Plan. This report must be submitted to the Elected Members of the Planning Authority for their consideration.

The legislative requirements state that a Chief Executive's Report shall:

- List the person or bodies who made submissions or observations.
- Summarise the recommendations, submissions and observations made by the Office of the Planning Regulator.
- Summarise the issues raised, and recommendations made by the Northern and Western Regional Assembly.
- Summarise the submissions and observations made by other persons.
- Give the response of the Chief Executive to the issues raised, taking account of:
 - Any directions of 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 the area.
 - Any relevant policies or objectives of the Government or of any Minister of the Government.

The Chief Executive Report has been prepared in accordance with these statutory requirements.

1.2: Legislative Background

The prescribed process for a County Development Plan is set out in the Planning and Development Act 2000 (as amended).

The Planning and Development Act 2000 sets out mandatory objectives which must be included in a Development Plan. These include, inter alia, objectives for the zoning of land, the provision of infrastructure, the conservation and protection of the environment, and the integration of the planning and sustainable development of the area with the social, community and cultural requirements of the area and its population. Other non-mandatory objectives are also referred to in the Planning Act.

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. Proposed Material Amendments will be screened against SEA legislation. The results of this screening exercise along with (if deemed necessary) any revisions or amendments to the SEA will supplement any proposed material alteration that is placed on public display.

Appropriate Assessment

As required by the provisions of the EU Habitats Directive (92/43/EEC) and the Planning and Development Act 2000 (Part XAB) (as amended), and the European Communities (Birds and Natural Habitats) Regulations 2011 (as amended), alterations proposed on foot of this Chief Executives report have been 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.

Ministerial Guidelines issued to Planning Authorities regarding their functions under the Planning Acts have been considered in the making of this Plan and have been implemented in the various chapters, in accordance with Section 28 of the Planning and Development Act 2000 (as amended).

1.3: Draft Development Plan Consultation

The Planning and Development Act 2000 (as amended) requires that the Draft Plan is put on display for a period of not less than 10 weeks. The Draft Plan public consultation period ran from 5th of September to the 14th November 2024. During this period, the Draft Plan and Environmental Reports (Strategic Environmental Assessment (SEA), the Strategic Flood Risk Assessment (SFRA) and the Natura Impact Statement (NIS)), were available to view online at www.monaghan.ie with hard copies of the material provided at the following locations and branch libraries:

- The Planning Department, 1 Dublin Street, Monaghan Town, H18 X982
- Monaghan Municipal District Office, The Glen, Monaghan Town, H18 YT50
- Castleblayney-Carrickmacross Municipal District Office, Riverside Road, Carrickmacross, A81 HY83
- Ballybay-Clones Municipal District Office, The Diamond, Clones, Co. Monaghan, H23 X378
- Monaghan Library, North Road, Monaghan, H18 RP20
- Carrickmacross Library, Riverside Road, A81 HY83
- Castleblayney Library, Gate Lodge 2, Market Square, A75 V383
- Clones Library, 98 Avenue, Clones, H23 RW70
- Ballybay Library, Birch Court, Main Street, A75 TR79

Acknowledging that consultation provides a key opportunity for citizens, stakeholders, community groups, businesses and the general public, including children, to ensure that their views are considered in shaping the future of their community and their County, engagement in the process was actively encouraged.

A tab under the Planning Section of the Monaghan County Council Website was established which included information regarding the review of the Development Plan, including a link to the Draft Development Plan, Appendices and Environmental Reports, details of public information events as well as information on how to make a submission or observation.

Emails with a link to the Draft Development Plan, Appendices and the Environmental Reports were sent to a wide variety of groups and stakeholders, including social, community, voluntary and sporting groups, etc.

Regular updates regarding the review of the Development Plan were provided on social media platforms to notify the public of issues relating to the review of the Development Plan and raise the profile of the ongoing process. Table 1 below provides details on the level of interactions from the public with social media employed during the public consultation period.

Channel	Posts	Impressions	Engagements
Facebook	18	29,839	488
X/Twitter	13	2,375	86
Instagram	14	2,940	37
LinkedIn	4	2,158	114

Table 1: Social media channels and information on public interaction

Radio adverts were presented on Northern Sound Radio, advertising the public consultation period and public information events which ran during the consultation period. The adverts encouraged people to visit the webpage for further information.

In addition to the statutory notices which were placed in the Northern Standard, Anglo Celt and Dundalk Democrat, further reminder press releases were also placed in the newspapers to encourage engagement in the process.

A number of Public Information Events on the Draft Plan were also held in each of the main towns:

Venue	Date	Time
Civic Offices, Riverside Road, Carrickmacross, A81 HY83	Monday 16 th September 2024 Wednesday 9 th October 2024	6pm-8pm
The Planning Office, 1 Dublin Street, Monaghan Town, H18 X982	Tuesday 17 th September 2024 Tuesday 1 st October 2024	6pm-8pm
Youth Work Ireland Board Room, Birch Court, Main Street, Ballybay, A75 W611	Wednesday 18 th September Monday 30 th September 2024	6pm-8pm
Clones Court House, McCurtain Street, Clones, H23 N290	Tuesday 24 th September 2024 Tuesday 15 th October 2024	6pm-8pm
Castleblayney Gate Lodge, Muckno Street, Castleblayney, A75 KP73	Thursday 26 th September Thursday 10 th October 2024	6pm-8pm

Table 2: Details of Public Information Events

Additionally, the Forward Planning Team addressed Planning Agents and Architects as well as the PPN (Public Participation Network):

Group/Organisation	Date	Location
Planning Agents and Architects	Wednesday 18 th September 2024	Online
Local Community Development Committee (LCDC)	Tuesday 17 th September 2024	Council Chamber Armagh Road, Monaghan

Table 3: Details of presentations provided by the Forward Planning Team

Submissions and observations were received via the Monaghan County Council Portal (consult.monaghancoco.ie), via a dedicated email (devplan@monaghancoco.ie) or via hard copy.

A total of one hundred and forty nine valid submissions and observations were received during this period. The extent and detail of the submissions received highlights the significant level of public interest in the plan making process. A list of valid submissions and observations is contained in this document. The list contains hyperlinks to allow access to the full detail of any individual submission.

The table below includes a broad breakdown of observations received. A number of submissions contained several observations, which referred to a number of different themes within the Plan.

Draft Development Plan Theme	Number of Submissions/Observations
Introduction	3
Core Strategy	2
Housing Strategy	2
Economic Development	5
Community	2
Heritage	6
Transport and Infrastructure	14
Environment	1
Energy and Climate Change	2
Strategic Objectives	2
Monaghan Town	23
Carrickmacross Town	16
Castleblayney Town	9
Clones Town	7
Ballybay Town	3
Development Management	6
Implementation and Monitoring	0
General Submission	16
Appendices	0
Environmental Reports- AA and SEA	3
Strategic Flood Risk Assessment	12
Land Use Zoning and Maps	15
Conservation and Landscape	2
Villages	11

Table 4: Breakdown of content of submission themes

1.4: Next Steps

Section 12 (5) of the Planning and Development Act 2000 (as amended) requires the Elected Members, following receipt of the Chief Executive's Report to consider the Draft Plan and the Chief Executive's Report.

Where, following consideration of the Draft Plan and the Chief Executive's Report, it appears to the Elected Members that the Draft Plan should be accepted or amended, they may, by resolution, accept or amend the Draft and make the Development Plan accordingly.

Should amendments be proposed which would constitute material alterations to the Draft Plan, there is a further requirement for a public display period to give the public an opportunity to comment on the proposed amendments only. This is followed by the preparation of a further Chief Executive's Report for the Elected Members on any submissions/observations received. Members may then make the Development Plan with or without the proposed amendments, or with modifications to the proposed amendments, as they consider appropriate.

1.5 Layout of the Chief Executive Report

This report has been prepared in accordance with the requirements of Section 12 of the Planning and Development Act 2000 (as amended). The legislation requires that a full summary of all submissions is provided as well as the Chief Executive's Response to the issues raised in submissions.

Part 1 of the report is the Introduction which includes an explanation of the legislative requirements for the making of the new Development Plan.

Part 2 includes a summary of the observations, submissions and recommendations made by the Office of the Planning Regulator (OPR) and the Northern and Western Regional Assembly (NWRA) and includes the response of the Chief Executive to the issues raised.

Part 3 summarises the submissions received from Prescribed Bodies and includes the and includes the response of the Chief Executive to the issues raised (excluding those from the OPR and NWRA).

Part 4 summaries the submissions received with respect to Monaghan, Carrickmacross, Castleblayney, Clones and Ballybay Towns and includes the response of the Chief Executive to the issues raised.

Part 5 summaries the submissions received with respect to Tier 4, 5 and 6 villages and includes the response of the Chief Executive to the issues raised.

Part 6 summaries the remaining submissions received and includes the response of the Chief Executive to the issues raised.

Part 7 outlines amendments to maps of the Draft Plan which are being recommended following internal consultation, where notable omissions and/or where typing errors were identified. Minor amendments to maps have also been undertaken to exclude floor risk areas such as drains, watercourses etc.

Where it is proposed to modify the text of the Draft County Development Plan this is indicated as follows:

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

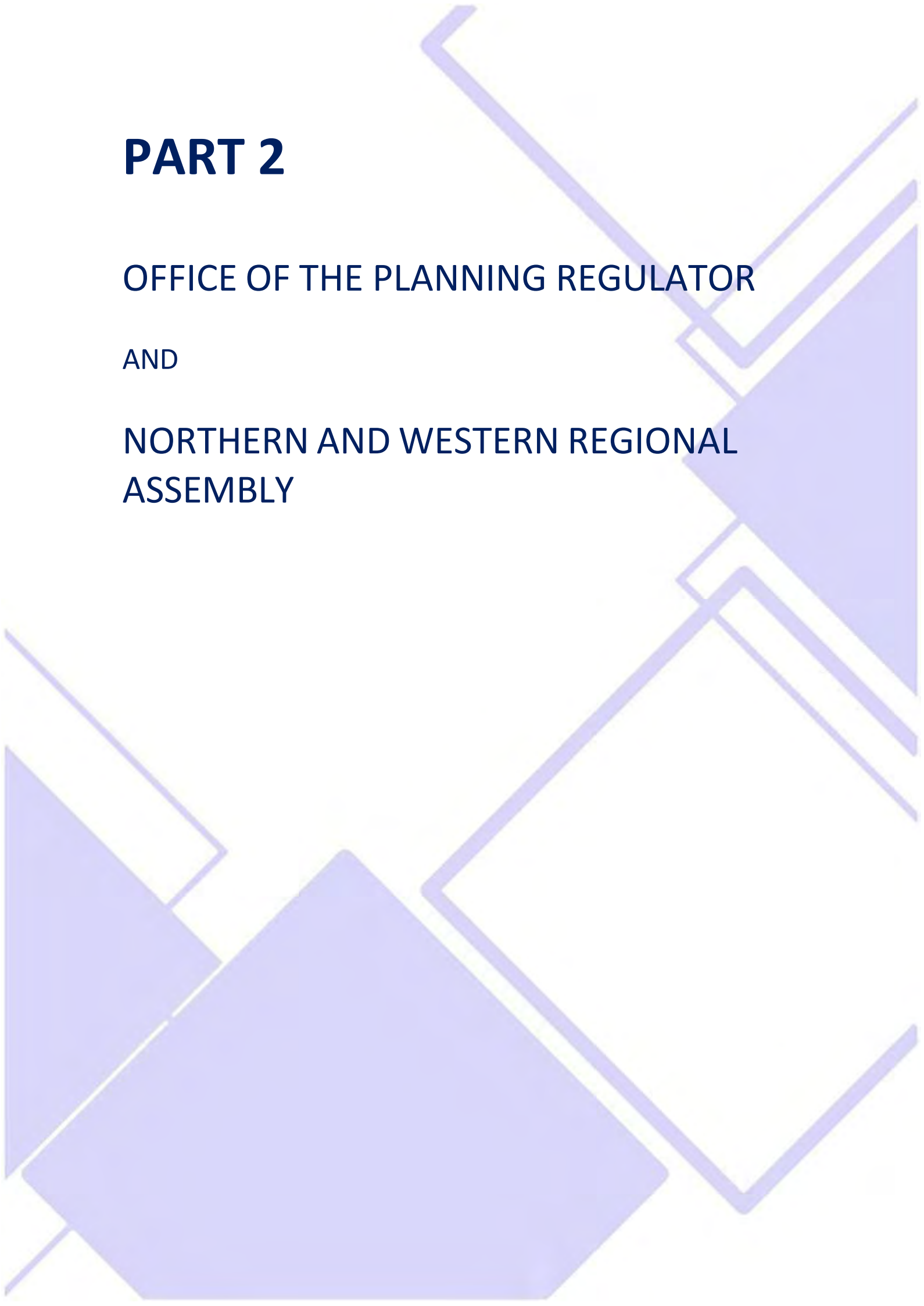
This report is also accompanied by a Map Book which provides the context for submissions received specific to the land use zoning requests. Where it is proposed to change the zoning of a site, reference is made to the relevant page number in the 'Map Book' under the Chief Executives Recommendation.

PART 2

OFFICE OF THE PLANNING REGULATOR

AND

**NORTHERN AND WESTERN REGIONAL
ASSEMBLY**



Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-126</u>	Office of the Planning Regulator (OPR)	N/A	N/A

Summary of Submission & Issues Raised

- A detailed 48 page submission was received from the OPR, which acknowledged the considerable work undertaken in preparing the draft development plan.
- The County Development Plan has proactively embraced many of the challenges and opportunities identified in the National Planning Framework (NPF) and the Northern and Western Regional Assembly Regional Spatial and Economic Strategy (RSES), through promoting regeneration and renewal of towns and villages in the county, supported by settlement plans and village plans, promoting the implementation of the Monaghan Climate Action Plan 2024- 2029 (the Monaghan Climate Action Plan) and committing to the preparation of an Integrated Transport Plan (ITP) for the county.
- The Office supports the overall approach of the County Development Plan to support and develop the regional function that Monaghan Town performs and the proposed settlement strategy. The county provides a wide range of social and physical infrastructure and is well placed to provide a high quality of life for existing and future residents, and a more sustainable pattern of development.
- However, further work is required in the preparation of the core strategy to ensure that it complies with the statutory and policy requirements.
- Submission raises concerns regarding the extent of land zoned for Strategic Residential Reserve at locations where it does not support long term compact growth and/or follow a sequential approach to the zoning of lands and/ or is in an area at risk of flooding.
- Monaghan has a high level of housing in the open countryside compared to its towns and villages¹ and the key challenge for the Planning Authority will be to deliver and implement a plan that ensures growth takes place in a compact and sequential manner in towns and villages, facilitating active and sustainable transport modes.
- The Office also considers that further consideration is required across a number of areas to ensure that the core strategy complies with the statutory and policy requirements for this key part of your County Development Plan.
- Monaghan has a high level of housing in the open countryside and the plan should ensure that growth takes place in a compact and sequential manner in towns and villages, facilitating active and sustainable transport modes.
- The Office’s evaluation of the plan is required to address, in particular, climate change, definition of appropriate settlement boundaries, the zoning of lands for specific uses, and the establishment of guiding policies for smaller towns and settlements to promote effective integration of land use and transportation policies.
- The Office highlights the need to provide a firmer commitment to prepare a renewable energy strategy and to support the protection and development of electricity infrastructure.
- The Office makes a number of recommendations which the Planning Authority is required to implement or address recommendation(s) made by the Office in order to ensure consistency with the relevant policy and legislative provisions.
- The Planning Authority is requested by the Office to action an observation which is a request for further information, justification on a particular matter, or clarification regarding particular provisions of a plan on issues that are required to ensure alignment with policy and legislative provisions.
- The submission makes fifteen recommendations (**R1-R15**) and also ten observations (**O1-O10**), set as follows:-

R1(i) Prepare a Housing Supply Target for the plan-period in accordance with the Housing Supply Target Methodology and appendix 1 of the accompanying Ministerial Letter to Local Authorities of 18/12/20 relating to Structural Housing Demand in Ireland and Housing Supply Targets, and the associated section 28 guidelines: Housing Supply Target Methodology.

R1(ii) Review the population projections in the core strategy to ensure they address population growth over the plan-period in accordance with the Development Plans Guidelines.

R1(iii) Review the proposed core strategy (including settlement strategy and associated identification of development potential and zoning) and revise as necessary to comply with the methodology as per (i) above and the approach set out at section 4.3.1 of the Development Plans Guidelines.

R1(iv) Consolidate table 2.5 and 2.6 to present the core strategy in a single table to provide for greater clarity and transparency, and include housing supply targets and population projections for each settlement specific to the plan-period.

R2 Direct any revised population and housing target growth to the Tier 1 – 3 settlements

R3(i) Review the following sites zoned Strategic Residential Reserve and to rezone the lands for an appropriate land use where they do not support long term compact growth and / or do not follow a sequential approach to the zoning of lands and / or are in an area subject to flooding

Monaghan Town

- a) MT 2
- b) MT 10
- c) MT 11
- d) MT 13
- e) MT 18
- f) MT 28
- g) MT 31
- h) MT 32
- i) MT 36

Carrickmacross

- j) CK 11
- k) CK 12
- l) CK 13
- m) CK 22
- n) CK 27
- o) CK 31
- p) lands at Carrickmacross, north of town centre adjoining R180 (not identified in appendix 16);

Castleblayney

- p) CB 8
- q) CB 9

Clones

- r) CL 10
- s) CL 11
- t) CL 21
- u) CL 26

Ballybay

v) Lands to the rear of BB4

w) BB 9 / BB 12

x) BB 18

R3(ii) Amend the Strategic Residential Reserve Land Use Objective (LUO 5) to ensure that no residential development proposals, including single housing will be considered by the Planning Authority, on lands identified as Strategic Residential Reserve until after the plan-period 2025-2031.

R4(i) Review the extent of land zoned for residential or a mixture of residential and other uses in the core strategy (table 2.6) to ensure consistency with the revised housing supply targets, as calculated under the Housing Supply Targets Methodology for Development Planning Guidelines for Planning Authorities (2020).

R4(ii) Review the density assumptions in table 2.6 of the core strategy to ensure that higher residential densities within the ranges set out in the Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities (2024) have been applied.

R4(iii) Review the Infrastructural Assessment in appendix 16, engaging with relevant statutory bodies, to include a reasonable estimate of the full cost of delivery of the required infrastructure to the identified zoned lands to clarify if Tier 2 zoned lands are serviceable within the plan-period.

R4(iv) Amend the core strategy table to include the area zoned to accommodate residential development in hectares and estimated housing yield for each area, specifically identifying the Additional Provision where relevant.

O1 Revise residential zoning objectives from three two, by removing Proposed Residential B and identifying Existing Residential and Proposed Residential

O2 Include measurable and deliverable policy objectives within chapter 10 – 14 Settlement Plans for:
(i) Tier 1 – 3 settlements in respect of key areas for development, infrastructure priorities, natural and built heritage, key sustainable mobility priorities and any further relevant key future priorities; and
(ii) Monaghan Town in respect of key future priorities and implementation measures to support the achievement of RSES growth targets (RPO 3.1).

R5(i) Detail in the core strategy the area of land in each settlement that will contribute to compact growth including 30% within the built-up footprint in Tiers 1 – 3, and 20% on brownfield lands within Tier 4 – 6, and the anticipated housing yield from compact growth for each settlement

R5(ii) Identify on the zoning maps for Tier 1 – 3 settlements regeneration / masterplan / opportunity sites to clarify the priority areas for town centre regeneration and renewal.

O3 Update the Housing Need Demand Assessment 2022-2031 having regard to the outcome of Recommendation 1, in order to correlate and accurately align future housing requirements,

R6(i) Provide that all New Residential is required to be compliant with the residential density standards set out in the Sustainable Residential Development for Urban Areas, Guidelines for Planning Authorities (2009).

R6(ii) Define parking standards in the County Development Plan as maximum standards.

R6(iii) Include an additional policy objective to provide for car-free developments for specified development types in appropriate contexts to facilitate urban regeneration, infill / brownfield and compact growth.

R6(iv) Review the public open space and private open space standards to ensure consistency the Compact Settlements Guidelines.

R7 Identify in the Monaghan County Development Plan 2025-2031 the use of particular areas for traveller accommodation, including the identification of specific locations in the land use zoning maps for the county.

R8 Clarify whether the population growth projected for the Tier 4 serviced villages of Clontibret and Oram can be accommodated during the plan period due to potential infrastructure constraints.

R9(i) Provide proactive measures to ensure that the 20% target for the delivery of all new housing in rural areas on brownfield sites can be achieved, including the provision of serviced sites.

R9(ii) Provide timeframes for the delivery of Tier 4 village plans and clarify that in addition to the village plans focussing on housing, amenity, infrastructure and parking provision, sustainable reuse and regeneration will also be addressed.

O4(i) Review the range of uses open for consideration with the Community Facilities and Services zoning.

O4(ii) Amend the land use zoning matrix to not normally permit uses which are incompatible with the primary objective of the zone such as residential development.

R10(i) Provide robust justification for the extent and location of Employment zoned land and to demonstrate that the criteria of the aforementioned national policy have been satisfied, and specifically in respect of the following Employment zonings:

(a) Lands west of Carrickmacross along the R178

(b) CB IEE1

(c) CB IEE2

R10(ii) Demonstrate that lands identified as Tier 2 as defined in appendix 3 A Methodology for a Tiered Approach to Land Zoning of the NPF, in the Infrastructure Assessment are realistically serviceable within the plan period, including a reasonable estimate of the full cost of delivery of the required infrastructure.

R10(iii) Include a policy framework for the industrial development area at Lough Egish including specific objectives for Development Management and sustainable transport.

R11 Amend the land use zoning matrix (table 9.3) to ensure that retail warehousing is not permitted on Existing Commercial zoned land.

O5 Clarify at objectives TMO 8 and TMO 9 that tourism accommodation is encouraged in towns, and will only be acceptable in rural areas if it is location specific or resource based, to ensure consistency with NPO 16 of the NPF.

O6 Include a map to show the location of quarries and minerals across County Monaghan.

R12(i) Prepare existing baseline figures for modal share and modal share targets for the county, Tier 1 – 3 settlements and aggregate figures and targets for the rural area (Tier 4 – 6) for the plan period.

R12(ii) Provide timeframes for the preparation of the county-wide Integrated Transport Plan (ITP), LTPs for Monaghan Town and Carrickmacross, and sustainable mobility plans for Castleblayney, Clones and Ballybay.

R12(iii) Provide for the translation of specific measures / proposals from the ITP, LTPs and sustainable mobility plans, once prepared, into the County Development Plan to give them statutory weight and provide clarity on the settlement zoning maps.

R13(i) Amend Objective REO 2 in chapter 8 to commit to the preparation of a renewable energy strategy for the County and to a variation of the County Development Plan to incorporate its recommendations into the adopted Plan within one year of the publication of the Methodology for Local Authority Renewable Energy or a regional renewable electricity strategy, whichever is the sooner.

R13(ii) Review the landscape character map in the County Development Plan in tandem with the preparation of the renewable energy strategy.

R13(iii) Amend section 15.20 in chapter 15 to ensure that Policy EGP 1 supports the protection of existing electricity and gas infrastructure, the development of a safe, secure and reliable supply of electricity and gas, and new transmission and distribution infrastructure, subject to the relevant policy and statutory requirements.

R13(iv) Omit Policy EGP 2 in chapter 15.

R14(i) Review and amend the Strategic Flood Risk Assessment to ensure that it is fully consistent with the Plan Making Justification Test as set out in the Flood Guidelines, all zoned lands that can accommodate vulnerable uses should be included.

R14(ii) Review the following undeveloped sites located within Flood Zone A and / or B and, where they do not pass the Plan Making Justification Test, rezone such lands in Flood Zone A for water compatible use, and in Flood Zone B for water compatible or substitute for a land use appropriate to the level of flood risk:

Monaghan:

- (a) MTFRA 24;
- (b) MTFRA 31;
- (c) MTFRA 34;
- (d) MTFRA 35;
- (e) MTFRA 37;
- (f) MTFRA 38
- (g) MTFRA 40;
- (h) MTFRA 44;

Carrickmacross:

- (i) CMFRA18;
- (j) CMFRA19;
- (k) CMFRA24;
- (l) CMFRA25;
- (m) CMFRM26;

Castleblayney:

- (n) CBFRA1;
- (o) CBFRA2;
- (p) CBFRA9;
- (q) CBFRA10
- (r) CBFRA12

Clones

- (s) CSFRA2
- (t) CSFRA4
- (u) CSFRA15
- (v) CSFRA18;

Ballybay

- (w) BBFRA15
- (x) BBFRA23

R14(iii) Include a policy where all criteria of the justification test cannot be satisfied, to limit existing development to minor development only as outlined in section 5.28 of the Flood Guidelines and new development to water compatible uses in Flood Zone A and less vulnerable uses in Flood Zone B.

R14(iv) Review the land use zoning matrix to and / or include an objective to limit usage in flood risk areas to that appropriate to the level of flood risk.

R14(v) Review and amend the flood zone maps to ensure the correct datasets and probability extents have been illustrated.

R14(vi) Accurately overlay the flood zone maps with the land use zoning maps and village maps.

R14(vii) Include a policy at section 15.22.8 of Chapter 15 Development Management Standards to require compliance with section 15.22.8.

O7 Include Architectural Conservation Areas as outlined in chapter 6 within the land use zoning maps, and village maps, as relevant, in order to highlight these areas within the spatial context of each settlement that will assist in the delivery of NPO 17 to enhance, integrate and protect the value of built heritage assets.

O8 Amend Objective CFO 24 to include an 18-month timeframe for preparation of the maps identifying public rights of way and incorporation into the Monaghan County Development Plan 2025-2031 by way of variation.

R15(i) Include the proposed mitigation measures for Objectives SSO 12 and URO 5 set out in the NIR, in the County Development Plan to accurately reflect the conclusions of the NIR.

R15(ii) Produce a stage 1 appropriate assessment screening determination.

O8(i) Include in the monitoring strategy for the implementation of the County Development Plan:
a) compact growth: measurable targets and timelines against which the implementation of the core strategy compact growth targets can be measured and monitored

- b) regeneration: a clear timeline and strategic approach to carry out the Active Land Management Strategy (URO 4) and set measurable targets (perhaps by settlement for Tiers 1 – 4) and timelines against which the implementation can be monitored and measured
- c) rural housing and regeneration: clear targets and provisions for monitoring of the development of housing in rural settlements, the open countryside and the areas of under strong urban influence, and Ballybay
- d) sustainable transport: an effective monitoring regime for the implementation of the sustainable transport objectives and policies and modal share targets in particular.

O9(ii) Remove ‘subject to available resources’ or ‘as resources allow’ from the following Objectives and Policies: GIO 1, GIO 2, ACO 1, TP 1, ATP 10, REO 2, VIO 4, MTO 9, CMO 6, CBO 5, CLO 7, CFO 24.

O10 Address discrepancies between residential and employment land identified on the zoning maps and sites identified in the Infrastructure Assessment and Settlement Capacity Audit.

Chief Executive’s Response

The response to each recommendation and observation is as follows:-

R1(i) Prepare a Housing Supply Target for the plan-period in accordance with the Housing Supply Target Methodology and appendix 1 of the accompanying Ministerial Letter to Local Authorities of 18/12/20 relating to Structural Housing Demand in Ireland and Housing Supply Targets, and the associated section 28 guidelines: Housing Supply Target Methodology.

R1(i) A Housing Supply Target for the plan-period has been prepared in accordance with the Housing Supply Target Methodology and Appendix 1 of the accompanying Ministerial Letter, and the associated Section 28 Guidelines: **Housing Supply Target Methodology**. The Housing Supply Target Methodology (HSTM) table is included in the Appendix to this report and a simplified version is also set out in Section 3.4.2 Housing in Chapter 3 – Housing Strategy. The HSTM table has informed the revised Core Strategy Table 2.5 in Chapter 2 – Core Strategy. The explanatory text as indicated in the box below (new text in red) is proposed to be included within Section 2.2 in Chapter 2 – Core Strategy in the revised draft development plan.

For the purpose of informing the Core Strategy a Housing Supply Target Methodology (HSTM) Table has been prepared for the plan period using the most up to date figures at time of writing in relation to house completions from the Central Statistics Office (CSO) to determine unmet demand to be incorporated within the plan period. A simplified version of this HSTM table is contained within Section 3.4.2 Housing in Chapter 3 – Housing Strategy.

The revised Core Strategy Table 2.5 as set out below is proposed to be inserted after Section 2.10 in Chapter 2 – Core Strategy.

Table 2.5 Core Strategy Table

Settlement		Population and Housing					Land Zoning Required					
Settlement Type	Settlement Name	Census 2022 Population	Census 2022 (%)	Population Target 2025-2031	Housing Target (units)	Housing Target %	Existing Zoning (ha)	Zoned land Required (with additional surplus) (ha)	Target Residential Density (UPH)	Minimum 30% Infill Lands (ha)	Remaining 70% lands (non-infill) (ha)	Shortfall/ Excess of Zoned Land
County		65288	100.0	4152	2558	100.0	107.80	82.71	-	66.11	14.97	42.96
Key Town (Tier 1)	Monaghan	7894	12.1	1204	742	29.0	44.10	30.91	30	28.59	1.85	13.19
Self Sustaining Growth Towns (Tier 2)	Carrickmacross	5745	8.8	872	537	21.0	25.90	22.38	30	12.05	9.92	3.52
	Castleblayney	3926	6.0	498	307	12.0	16.00	15.35	25	14.54	0.47	0.85
Self Sustaining Towns (Tier 3)	Clones	1885	2.9	249	153	6.0	11.40	7.67	25	6.33	1.01	3.73
	Ballybay	1329	2.0	166	102	4.0	10.40	6.40	20	4.60	1.72	4.01
Villages (Tier 4)*		4833	7.4	332	205	8.0	-	-	-	-	-	-
Rural Areas (including Tier 5 & Tier 6 Villages)		39676	60.8	830	512	20.0	-	-	-	-	-	-

*Includes the villages of Annyalla, Clontibret North, Doohamlet & Oram which have been redesignated from Tier 5 to Tier 4 settlements.

R1(ii) Review the population projections in the core strategy to ensure they address population growth over the plan-period in accordance with the Development Plans Guidelines.

R1(ii) The population projections in the Core Strategy have been reviewed having regard to the Housing Supply Target Table 2.5 after Section 2.10 in Chapter 2 – Core Strategy as set out above to include only population growth over the plan-period in accordance with the Development Plans Guidelines. The revised Core Strategy Table 2.5 as set out above is proposed to be included in the revised draft development plan.

R1(iii) Review the proposed core strategy (including settlement strategy and associated identification of development potential and zoning) and revise as necessary to comply with the methodology as per (i) above and the approach set out at section 4.3.1 of the Development Plans Guidelines.

R1(iii) The population projections in the Core Strategy have been reviewed having regard to the Housing Supply Target Table 2.5 after Section 2.10 in Chapter 2 – Core Strategy as set out above to address population growth over the plan-period in accordance with the Housing Supply Target Methodology and the approach set out at section 4.3.1. of the Development Plans Guidelines. The Core Strategy, settlement strategy and associated identification of development potential and zoning are also proposed to be revised in line with the revised Core Strategy Table 2.5 above in the box below (strike through is deleted text with new text in red).

2.5 Economic Development Strategy

In accordance with NPO 9 of the NPF, Monaghan Town is designated as a key town within the RSES, and therefore is identified in the RSES for significant rates of population growth of 30% or more above Census 2016 population levels. This means that Monaghan Town should achieve a population of at least 10,000 by 2040. To ensure this target is met Monaghan Town must achieve a population in the region of 9,200 by the end of this development plan period. However, it is considered that to achieve a suitable critical mass for this key town, a population target of 9,700 persons by 2031 should be strived for. Monaghan is the primary economic growth town to be promoted for regional enterprise where critical mass is a core objective to justify strategic infrastructure provision. Thus, Monaghan Town is designated as a Tier 1 settlement.

Carrickmacross, which is identified in the RSES as a town with strategic potential on a regional scale, and Castleblayney, both have experienced strong population growth in the County over the last number of census periods. Both towns are identified as secondary economic centres whereby capacity exists to provide new employment opportunities in these strategic locations which are very accessible both to the rest of the County, and the wider surrounding region, including the M1 motorway, Dundalk, the Greater Dublin Area and the Eastern Economic (Dublin – Belfast) Corridor. Furthermore, these towns have the potential to provide employment opportunities that build on the existing assets of the towns, which will assist in reducing long distance commuting patterns and developing more sustainable communities. Thus, Carrickmacross and Castleblayney are designated as Tier 2 settlements and have projected population growth of ~~16.4~~15.2% and ~~15.4~~12.7% respectively over the plan period.

The towns of Clones and Ballybay will be encouraged to create new local employment opportunities as well as providing services to the population within their hinterlands. Thus, Clones and Ballybay are designated as Tier 3 settlements. As Clones experienced moderate population growth over the last census period and National Policy Objective 3a within the NPF aims to “Deliver at least 40% of all new homes nationally within the built-up footprints existing settlements”, these towns have projected population growth of ~~15~~13.2% and ~~13.6~~12.5% respectively over the plan period.

The larger villages will also be encouraged to create new local employment opportunities as well as providing services to the population within their hinterlands. In previous Monaghan County

Development Plans ten large villages comprising of Ballinode, Emyvale, Glaslough, Inniskeen, Newbliss, Rockcorry, Scotshouse, Scotsown, Smithborough, and Threemilehouse were designated as Tier 4 settlements. However, in recognition of the growth of Annyalla, Clontibret North, Doohamlet and Oram in recent times, these four villages are also now designated as Tier 4 settlements. As National Policy Objective 3a within the NPF aims to “Deliver at least 40% of all new homes nationally within the built-up footprints existing settlements” these ~~towns~~ **villages** have projected population growth of **11.76.8%** over the plan period.

The wider rural area will continue to provide for employment generating uses that are locational based including, but not limited to, agri-business, rural based tourism and renewable energy projects.

As detailed in Table 2.1 above, the population of County Monaghan is projected to grow to 71,516 persons by 2031. In order to promote regeneration, consolidation and growth in the settlements, a sufficient proportion of the County’s population growth has been allocated to them, based on their role and function. The allocations of population growth are presented in Table 2.2 below.

Table 2.3 Population Targets 2031

Tier	2016 Population	2022 Population	Targeted Share (%) of Population by 2031	Projected % Growth from 2022 to 2031	Projected Population by 2031
Tier 1 Principal / Key Town Monaghan	7,678	7,894	12.9 13.6	16.5 22.9	9,197 9,700
Tier 2 Strategic Towns Carrickmacross Castleblayney	5032 3607	5,745 3,926	9.4 9.9 6.3 6.5	16.4 22.8 15.4 19.0	6,687 7,053 4,531 4,673
Tier 3 Service Towns Clones Ballybay	1680 1241	1,885 1,329	3 3.2 2.3 2.2	15.0 19.8 13.6 18.7	2,168 2,259 1,510 1,578
Tier 4 Villages Large Village Network	3,672	4,833*	8.5* 7.5	11.7* 10.3	5,398* 5,331*
Tier 5 & 6 Rural Settlements Rural Community Settlements / Dispersed Rural Communities and Remaining Rural Area	38,476	39,676	58.8 57.2	5.9 3.1	42,026 40,922
TOTAL County Monaghan	61,386	65,288	100%	9.5	71,516

*Includes the villages of Annyalla, Clontibret North, Doohamlet & Oram which have been redesignated from Tier 5 to Tier 4 settlements

2.7 Regeneration of Existing Lands

It is considered appropriate to include for the reuse, regeneration and renewal of land through active land management over this Plan period, having regard to legislative requirements, and to national and regional policy. The NPF target of delivering 30% of new housing within the existing built-up footprint of settlements, on infill and brownfield lands and the principles contained within the Town Centre First Policy are key considerations in this regard. The regeneration of land (as defined by the Urban Regeneration and Housing Act 2015) and buildings in need of development and renewal throughout

the County, is an objective of this development plan and Monaghan County Council will seek to develop and improve areas in need of development and renewal, particularly within designated settlements.

It is therefore important to acknowledge that **The Core Strategy Table provides for a significant proportion of future urban development will to occur on infill/brownfield/regeneration lands within the built envelope—up area of existing settlements.** In order to encourage this type of **brownfield/regeneration** development within the urban centres, a relaxation of some development management standards will be considered where appropriate. ~~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. Therefore, the amount of greenfield lands required to be zoned for residential use is based on 80% of the population growth. This has been reflected in the Core Strategy Table 1.~~

Table 2.4 County Monaghan Population Projections 2022 to 2031

Hierarchy	Location	2022 Population	Projected Additional Population	Projected Population 2031
Tier 1 Principal / Key Town	Monaghan	7,894	1303 1806	9,197 9,700
Tier 2 Strategic Town	Carrickmacross	5,745	942	6,687
	Castleblayney	3,926	1308 605 747	7,053 4,531 4,673
Tier 3 Service Town	Clones	1,885	283	2,168
	Ballybay	1,329	374 181 249	2,259 1,510 1,578
Tier 4 Villages	Ballinode	433	51 45	484 478
	Emyvale	638	75 67	713 705
	Glaslough	443	52 46	495 489
	Inniskeen	405	47 42	452 447
	Newbliss	352	41 37	393 389
	Rockcorry	302	35 31	337 333
	Scotshouse	317	37 33	354 350
	Scotstown	436	51 45	487 481
	Smithborough	495	58 51	553 546
	Threemilehouse	148	17 16	165 164
	Annyalla	205	24 22	229 227
	Clontibret North	191	22 15	213 206
	Doohamlet	287	34 30	321 317
	Oram	181	21 18	202 199
Tier 5 & 6 Remaining Rural Area	Rural Community Settlements / Dispersed Rural Communities and Remaining Rural Area	39,676	2,350 1,246	42,026 40,922
	County Monaghan	65,288	6,228	71,516

2.10 Sustainable Residential Densities

For the purposes of ascertaining a suitable housing land requirement for County Monaghan and having regard to the ~~above~~ **range of densities set out in the Sustainable Residential Development and**

Compact Settlements Guidelines for Planning Authorities (2024), it is considered appropriate to apply a ~~gross~~ density of ~~18~~ **30** units per hectare within the larger settlements (Key and Large towns), ~~15-25~~ units per hectare (~~gross~~) in the medium settlements (Medium and Small towns), and ~~10~~ **20** units per hectare (~~gross~~) in the smaller settlements (Rural town and Villages). It is considered that this is both practical and realistic for the urban settlements of County Monaghan where most of the sites suitable for new residential development have, in the main, extensive topographical challenges.

The Core Strategy provides for the development of lower density houses within the urban settlements. This will be permitted through schemes that provide suitable housing to meet the needs of people who might otherwise seek to build a one-off dwelling in the rural area. Such schemes will only be permitted on suitable lands located within the designated settlement boundaries where it is demonstrated that there is a demand for the development within the settlement and where it contributes to the sequential development of land from the centre of the settlement outwards or represents a consolidation of the settlement footprint.

As **Figure 3.1 of the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024)** indicates that detached /semi detached housing will be in the density range of **15-30 dwellings per hectare**, a lower density assumption of ~~10~~ **15** units per hectare (~~gross~~) (**unless where site specific circumstances can justify otherwise**), is being proposed for the option of developing low density developments and/or serviced sites in suitable locations within the designated settlements. **As the target densities in the revised Core Strategy Table 2.5 are based on average density across Proposed Residential A and Proposed Residential B zonings this does not affect the quantum of lands to be zoned.** To offer more locational choice and as an incentive to release land for low density development, the quantum of low-density residential land has been doubled but with the strict caveat that only 75% of this quantum is developed during the plan period which equates to the 150% market choice available to the Proposed Residential A zoning.

Table 2.5 overleaf indicates the housing units and greenfield land requirements based on the population projections set out for County Monaghan up to 2031. Table 2.6 overleaf details the densities appropriate to the settlements in County Monaghan having regard to the Guidelines and the requirement to offer low density serviced sites and provides for the quantum of zoned housing land required (HLR) to accommodate the projected population increase.

Table 2.5 Core Strategy Table 1

Tier in Settlement Hierarchy	Location	Projected Population 2031 (persons)	Population Increase (persons) 2025-2031	20% Brownfield /Infill/ Regeneration Allocation	80% Greenfield Allocation	No. of Greenfield Units (2.74 persons per unit)
Tier 1	Monaghan	9,197	1,303	261	1042	380
Tier 2	Carrikmacross Castleblayney	6,687 4,531	942 605	188 121	754 484	275 177
Tier 3	Clones Ballybay	2,168 1,510	283 181	57 36	226 145	83 53
Tier 4	Villages	5,398*	565*	113*	452*	165*
Tiers 5 & 6	Rural Settlements Remaining Rural Area	42,026	2,350	470	1,880	686
Total	County Monaghan	71,516	6,228	1,246	4,983	1,818

Table 2.6 Core Strategy Table 2

Tier in Settlement Hierarchy	Location	No. of Greenfield Units (2.74 persons per unit)	HLRA 2019-2025 CDP	HLRA 2025-2031 (excluding 50% Market Choice)	70% @ 18 units/ha Average Gross Density (including 50% Market Choice)	30% @ 10 units/ha Average Gross Density (including 100% Market Choice)	HLRA 2025-2031 (including Market Choice)
Tier 1	Monaghan Town	380	44.1	16.43	17.25	14.79	32.04
Tier 2	Carrickmacross	275	25.9	11.89	12.48	10.70	23.18
Tier in Settlement Hierarchy	Location	No. of Greenfield Units (2.74 persons per unit)	HLRA 2019-2025 CDP	HLRA 2019-2025 (excluding 50% Market Choice)	70% @ 15 units/ha Average Gross Density (including 50% Market Choice)	30% @ 10 units/ha Average Gross Density (including 100% Market Choice)	HLRA 2025-2031 (including 50% Market Choice)
Tier 2	Castleblayney	177	16	9.15	9.61	8.24	17.85
Tier 3	Clones	83	11.4	4.28	4.49	3.85	8.35
Tier in Settlement Hierarchy	Location	No. of Greenfield Units (2.74 persons per unit)	HLRA 2013-2019 CDP	HLRA 2019-2025 (excluding 50% Market Choice)	70% @ 10 units/ha Average Gross Density (including 50% Market Choice)	30% @ 10 units/ha Average Gross Density (including 100% Market Choice)	HLRA 2025-2031 (including Market Choice)
Tier 3	Ballybay	53	10.4	4.10	4.31	3.69	8.00
Tier 4	Villages	165*	=	12.42*	13.46*	11.54*	24.99*
Total	County Monaghan	1132	107.8	58.67	61.61	52.81	114.42

AHLR – Housing Land Requirement

Settlement		Population and Housing					Land Zoning Required					
Settlement Type	Settlement Name	Census 2022 Population	Census 2022 (%)	Population Target 2025	Housing Target (units)	Housing Target %	Existing Zoning (ha)	Zoned land Required (with additional surplus) (ha)	Target Residential Density (UPH)	Minimum 30% Infill Lands (ha)	Remaining 70% lands (non-infill) (ha)	Shortfall/ Excess of Zoned Land
County		65288	100.0	4152	2558	100.0	107.80	82.71	-	66.11	14.97	42.96
Key Town (Tier 1)	Monaghan	7894	12.1	1204	742	29.0	44.10	30.91	30	28.59	1.85	13.19
Self Sustaining Growth	Carrickmacross	5745	8.8	872	537	21.0	25.90	22.38	30	12.05	9.92	3.52
Towns (Tier 2)	Castleblayney	3926	6.0	498	307	12.0	16.00	15.35	25	14.54	0.47	0.65
Self Sustaining Towns (Tier 3)	Clones	1885	2.9	249	153	6.0	11.40	7.67	25	6.33	1.01	3.73
Villages (Tier 4)*	Ballybay	1329	2.0	166	102	4.0	10.40	6.40	20	4.60	1.72	4.01
Rural Areas (including Tier 5 & Tier 6 Villages)		4833	7.4	332	205	8.0	-	-	-	-	-	-
		39676	60.8	830	512	20.0	-	-	-	-	-	-

*Includes the villages of Annyalla, Clontibret North, Doohamlet & Oram which have been redesignated from Tier 5 to Tier 4 settlements.

Core Strategy Objectives	
CSO 5	To ensure that the quantum of lands zoned for residential uses in the County is consistent with the requirements of the Core Strategy as set out in Tables 2.6 and 2.7 Table 2.5 of the Monaghan County Development Plan 2025-2031, and to designate any land considered appropriate for zoning in excess of these requirements as Strategic Residential Reserve for potential development beyond this plan period.

R1(iv) Consolidate table 2.5 and 2.6 to present the core strategy in a single table to provide for greater clarity and transparency, and include housing supply targets and population projections for each settlement specific to the plan-period.

R1(iv) Core Strategy Tables 2.5 and 2.6 after Section 2.10 in Chapter 2 – Core Strategy are proposed to be consolidated to present the core strategy in a single table (as indicated above) to provide for greater clarity and transparency, and include housing supply targets and population projections for each settlement with a population (or projected population) of over 1500 persons (tier 1 – 3) specific to the plan-period. Population projections for each of the fourteen Tier 4 settlements is also set out in Table 2.4 above.

R2 Direct any revised population and housing target growth to the Tier 1 – 3 settlements

R2 Population and housing target growth is proposed to be reallocated to the Tier 1 – 3 settlements as set out in the revised Table 2.2, Table 2.4 and the Core Strategy Table 2.5 above contained within Chapter 2 – Core Strategy.

As a consequence, Section 10.2 of Chapter 10 – Monaghan Town Settlement Plan, Section 11.2 of Chapter 11 – Carrickmacross Town Settlement Plan, Section 12.2 of Chapter 12 – Castleblayney Town Settlement Plan, Section 13.3 of Chapter 13 – Clones Town Settlement Plan and Section 14.2 of Chapter 14 – Ballybay Town Settlement Plan are proposed to be amended to reflect the proposed changes to the Core Strategy as indicated in the box below (strike through is deleted text with new text in red).

Section 10.2 of Chapter 10

The Core Strategy set out in Chapter 2 of this Development Plan projects that the population of Monaghan town will grow to ~~9,197~~ **9,700** over this Plan period and a housing land requirement of almost ~~32~~ **31** hectares is being provided within the settlement boundaries to accommodate this projected growth. In the Core Strategy Monaghan is identified as a Tier 1 Principal/Key Town. The town will be promoted as the primary growth centre for industrial development, as the primary retail and service centre and as a strong and attractive residential centre. Monaghan Town also aspires to be a third level education provider.

Table 10.1 Monaghan Town Population Projections

2022 Population	Population as a % of County Monaghan population	2025 31 Projected Population	Projected % of County Monaghan Population 2031
7,894	12.09%	9,197 9,700	12.86 13.6%

Section 11.2 of Chapter 11

The Core Strategy set out in Chapter 2 of this Plan projects that the population of Carrickmacross town will grow to ~~6,687~~ **7,053** over this Plan period and a housing land requirement of over ~~23~~ **22** hectares is being provided within the settlement boundary to accommodate this projected growth. In this settlement strategy Carrickmacross is identified as a Tier 2 Strategic Town that will be promoted in driving growth and economic development in the south of County Monaghan.

Table 11.1 Carrickmacross Town Population Projections

2022 Population	Population as a % of County Monaghan population	2031 Projected Population	Projected % of County Monaghan Population 2031
5,745	8.80%	6,687 7,053	9.35 9.9%

Section 12.2 of Chapter 12

The Core Strategy set out in Chapter 2 of the Monaghan County Development Plan 2025-2031 further indicates that a housing land requirement of over ~~18~~ 15 hectares should be provided for within the settlement boundaries in order to accommodate this projected growth and support the function of Castleblayney as a Tier 2 Strategic Town within the County Monaghan Settlement Hierarchy.

Table 12.1 Castleblayney Town Population Projections

2022 Population	Population as a % of County Monaghan population	2031 Projected Population	Projected % of County Monaghan Population 2031
3,926	6.01%	4,531 4,673	6.34 6.5%

Section 13.3 of Chapter 13

Table 2.4 in Chapter 2 Core Strategy of the Monaghan County Development Plan 2025-2031 projects that the population of Clones will grow to ~~2,168~~ 2,259 persons over the plan period. A housing land requirement of ~~over 8~~ almost 8 hectares is provided for within the settlement boundaries in order to accommodate this projected growth. In the Core Strategy Clones is identified as a Tier 3 service town where the regeneration and renewal of the town centre is being promoted to enable it to continue its function in providing local services.

Table 13.1 Clones Town Population Projections

2022 Population	Population as a % of County Monaghan Population 2022	2031 Projected Population	Projected Population as a % of County Monaghan Population 2031
1,885	2.88%	2,168 2,259	3.03 3.2%

Section 14.2 of Chapter 14

The Core Strategy set out in Chapter 2 of the Monaghan County Development Plan 2025-2031 projects that the population of Ballybay will grow to ~~1,510~~ 1,578 over this plan period and a housing land requirement of approximately ~~8~~ 6.5 hectares is being provided within the settlement boundary to accommodate this projected growth.

Table 14.1: Ballybay Town Population Projections

2022 Population	Population as a % of County Monaghan population 2016	2031 Projected Population	Projected % of County Monaghan Population 2025
1,329	2.04%	1,510 1,578	2.11 2.2%

R3(i) Review the identified sites zoned Strategic Residential Reserve and to rezone the lands for an appropriate land use where they do not support long term compact growth and / or do not follow a sequential approach to the zoning of lands and / or are in an area subject to flooding

R3(i) The identified sites zoned Strategic Residential Reserve have been reviewed, and as a consequence the lands are proposed to be either dezone or rezoned for an appropriate land use where they do not support long term compact growth, and / or do not follow a sequential approach to the zoning of lands, and / or are in an area subject to flooding as follows:-

Monaghan Town

- a) **MT 2** – It is proposed to **retain the zoning** of these lands as Strategic Residential Reserve on the basis that the lands are located within the built up area, are determined to be Tier 1 lands in terms of servicing, are a small portion of land and are considered to be an infill site bounded by existing housing.
- b) **MT 10** – It is proposed to dezone these lands which comprise Strategic Residential Reserve zoning. It is also proposed to **dezone** the lands to the east of these lands which are zoned Existing Residential, Strategic Residential Reserve and Landscape Protection/Conservation zonings on the basis that they are also located outside the built up area and are sequentially further removed from the urban core.
- c) **MT 11** – It is proposed to **dezone** these lands which comprise Strategic Residential Reserve zoning on the basis that the lands are located outside the built up area and are sequentially further removed from the urban core. It is also proposed to dezone the lands to the north east of these lands which are zoned Existing Residential, Strategic Residential Reserve and Landscape Protection/Conservation zonings on the basis that they are similarly sequentially removed from the urban core.
- d) **MT 13** – It is proposed to **rezone** these lands from Strategic Residential Reserve to Landscape Protection/Conservation zoning on the basis that a significant portion of the lands are at risk of flooding and also as the lands are sequentially removed from the urban core.
- e) **MT 18** – It is proposed to **retain the zoning** of these lands as Strategic Residential Reserve and Proposed Residential B on the basis that the lands are located within the built up area, are determined to be Tier 1 lands in terms of servicing, are a small portion of land and are considered to be an infill site surrounded by existing housing.
- f) **MT 28** – It is proposed to **dezone** these lands which comprise Strategic Residential Reserve zoning on the basis that the lands are located outside the built up area and are sequentially removed from the urban core, with the exception of the GAA pitch in the eastern portion of the lands which is to be rezoned Recreation and Amenity on the basis that it is in use and it is important to retain this facility.
- g) **MT 31** – It is proposed to **dezone** the Western portion of these lands which comprise Strategic Residential Reserve zoning on the basis that the majority of the lands are located outside the built up area and are sequentially removed from the urban core. It is proposed to retain the eastern portion of the lands on the basis that they are sequentially close the urban core and are serviced and surrounded by community facilities such as schools and the leisure centre.
- h) **MT 32** – It is proposed to **dezone** these lands which comprise Strategic Residential Reserve zoning on the basis that that the lands are located outside the built up area and they are sequentially removed from the urban core.
- i) **MT 36** – It is proposed to **rezone** these lands from Strategic Residential Reserve zoning to Community Facilities / Services to allow for an extension of the adjoining Community Facilities / Services lands and to reflect the potential for public amenity use.

Carrickmacross

- j) **CK 11** – It is proposed to **retain the zoning** of these lands as Strategic Residential Reserve on the basis that the lands are located within the built up area, are determined to be Tier 1 lands in terms of servicing, are a small portion of land and are considered to be an infill site bounded by existing housing.
- k) **CK 12** – It is proposed to **dezone** these lands which comprise Strategic Residential Reserve zoning on the basis that they are sequentially removed from the urban core.
- l) **CK 13** – It is proposed to **retain the zoning** of the northern portion of these lands as Strategic Residential Reserve on the basis that the lands are located within the built up area, are determined to be Tier 1 lands in terms of servicing, and are considered to be an infill site bounded by existing housing. It is proposed to **rezone** the southern portion of the lands as Community Facilities / Services on the

basis that they are currently being used as a cemetery and also comprise additional lands for an extension to the cemetery.

m) **CK 22** – It is proposed to **dezone** these lands which comprise Strategic Residential Reserve zoning on the basis that the lands are located outside the built up area and are sequentially removed from the urban core.

n) **CK 27** – It is proposed to **retain the zoning** of these lands as Strategic Residential Reserve on the basis that the lands are located within the built up area, that following review of the Infrastructure Assessment the lands have been determined to be actually Tier 1 lands in terms of servicing, are a small portion of land, and are considered to be an infill site bounded by existing housing.

o) **CK 31** – It is proposed to **dezone** these lands which comprise Strategic Residential Reserve zoning on the basis that the majority of the lands are located outside the built up area and there is sufficient lands zoned Strategic Residential Reserve closer to the urban core.

p) lands at **Carrickmacross, north of town centre adjoining R180** (not identified in appendix 16) – It is proposed to **dezone** these lands which comprise Strategic Residential Reserve zoning on the basis that the lands are located outside the built up area and are sequentially removed from the urban core.

Castleblayney

p) **CB 8** – It is proposed to **dezone** these lands which comprise Strategic Residential Reserve zoning.

q) **CB 9** – It is proposed to **dezone** these lands which comprise Strategic Residential Reserve zoning.

Clones

r) **CL 10** – It is proposed to **retain the zoning** of these lands as Strategic Residential Reserve on the basis that the lands are determined to be Tier 1 lands in terms of servicing are considered to be an infill site surrounded by existing housing and recreation facilities.

s) **CL 11** – It is proposed to **dezone** the majority of these lands which comprise Strategic Residential Reserve zoning on the basis that the majority of the lands are sequentially removed from the urban core. It is also proposed as a consequence to dezone the adjoining lands to the immediate west and south that are zoned Landscape Protection / Conservation and Existing Residential.

t) **CL 21** – It is proposed to **dezone** these lands which comprise Strategic Residential Reserve zoning on the basis that a significant proportion of the lands are located outside the built up area and are sequentially removed from the urban core. It is also proposed as a consequence to dezone the adjoining lands to the northeast that are zoned Landscape Protection / Conservation and Existing Residential.

u) **CL 26** – It is proposed to **dezone** these lands which comprise Strategic Residential Reserve zoning on the basis that the lands are sequentially removed from the urban core. It is also proposed as a consequence to dezone the adjoining lands to the north that are zoned Existing Residential.

Ballybay

v) **Lands to the rear of BB4** – It is proposed to **dezone** these lands which comprise Strategic Residential Reserve zoning on the basis that a significant proportion of the lands are located outside the built up area and are sequentially removed from the urban core. It is also proposed as a consequence to dezone the adjoining lands that are zoned Existing Residential.

w) **BB 9 / BB 12** – It is proposed to **retain the zoning** of these lands which comprise Strategic Residential Reserve zoning (BB 9) and Proposed Residential A / Proposed Residential B (BB 12) on the basis that the lands are located within the built up area, are sequentially close to the urban core, are bounded by residential development, are in close proximity to the primary school and are fully serviced.

x) **BB 18** – It is proposed to **dezone** these lands which comprise Strategic Residential Reserve zoning on the basis that the lands are located in a peripheral position and are determined to be Tier 2 lands under the Infrastructure Assessment. It is also proposed as a consequence to dezone the adjoining lands to the immediate north that are zoned Industry, Enterprise and Employment.

R3(ii) Amend the Strategic Residential Reserve Land Use Objective (LUO 5) to ensure that no residential development proposals, including single housing will be considered by the Planning Authority, on lands identified as Strategic Residential Reserve until after the plan-period 2025-2031.

R3(ii) It is proposed to retain Objective LUO 5 in Table 9.1 within Section 9.2 of Chapter 9 – Strategic Objectives for Settlements relating to the permitting of single houses on lands zoned Strategic Residential Reserve on the basis that it facilitates farmers who are actively farming the land to live on the land and also provide family members with opportunity to live on the land for a smooth transition of ownership and the business in the future. This policy is restrictive with a requirement for justification for a dwelling under this objective to be demonstrated by the applicant including the submission of documentation to show that the landholding has been in family ownership for at least five years, similar to the requirements in respect of dwellings in the Rural Areas Under Strong Urban Influence. In such cases the applicant will also be required to demonstrate by way of an overall plan for the development of the lands, how the proposed development would not adversely affect the comprehensive development of the lands in the future. The removal of this provision could result in a landowner not currently living on the landholding having to move away from family farm, and possibly beyond the Rural Area Under Strong Urban Influence.

It should be noted that only two dwellings have been granted under this provision within the lifetime of the current development plan which incorporated a greater quantum of zoned Strategic Residential Reserve lands than proposed in the draft development plan. Therefore the quantum of residential units that may be permitted under this provision will be minimal and will have no material impact on the Core Strategy.

R4(i) Review the extent of land zoned for residential or a mixture of residential and other uses in the core strategy (table 2.6) to ensure consistency with the revised housing supply targets, as calculated under the Housing Supply Targets Methodology for Development Planning Guidelines for Planning Authorities (2020).

R4(i) The extent of land zoned for residential or a mixture of residential and other uses proposed in the revised Core Strategy Table 2.5 after Section 2.10 in Chapter 2 – Core Strategy ensures consistency with the revised Housing Supply Targets.

R4(ii) Review the density assumptions in table 2.6 of the core strategy to ensure that higher residential densities within the ranges set out in the Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities (2024) have been applied.

R4(ii) The density assumptions in the proposed revised Core Strategy Table 2.5 after Section 2.10 in Chapter 2 – Core Strategy are proposed to be revised upwards to an average density of 30 units per hectare for Monaghan and Carrickmacross, 25 units per hectare for Castleblayney and Clones, and 20 units per hectare for Ballybay. This ensures that the residential densities are within the ranges set out in the Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities (2024).

R4(iii) Review the Infrastructural Assessment in appendix 16, engaging with relevant statutory bodies, to include a reasonable estimate of the full cost of delivery of the required infrastructure to the identified zoned lands to clarify if Tier 2 zoned lands are serviceable within the plan-period.

R4(iii) A review of the Infrastructural Assessment in Appendix 16 was carried out in consultation with Uisce Éireann and relevant Sections within the Council. This review determined that some of the lands identified in the draft development plan as Tier 2 lands are in fact Tier 1 lands and these have been indicated in the revised Infrastructure Assessment. Other Tier 2 lands are proposed to be dezoned, while for the limited number of remaining Tier 2 lands an assessment was carried out in relation to the feasibility of providing infrastructure to these lands. This was on the basis that if it is possible to service the lands with a limited extension of infrastructure, then these services will be provided at the developer's expense. Given that any cost estimates provided at this time may not be applicable in the

future, it is considered that this is a more reasonable and rational approach rather than estimating of the full cost of delivery of the required infrastructure to the identified zoned lands to clarify if Tier 2 zoned lands are serviceable within the plan period. Only those Tier 2 lands where it has been determined that infrastructure can be feasibly provided to these lands are proposed to be zoned for development. It should also be noted that Uisce Éireann has confirmed that it is not in a position to provide estimated costs for the provision of infrastructure to service lands.

R4(iv) Amend the core strategy table to include the area zoned to accommodate residential development in hectares and estimated housing yield for each area, specifically identifying the Additional Provision where relevant.

R4(iv) The proposed revised Core Strategy Table 2.5 after Section 2.10 in Chapter 2 – Core Strategy now includes the area zoned to accommodate residential development in hectares and estimated housing yield for each area, and specifically identifies the Additional Provision of 25%.

O1 Revise residential zoning objectives from three to two, by removing Proposed Residential B and identifying Existing Residential and Proposed Residential

O1 It is proposed to retain the three residential zoning objectives (Existing Residential, Proposed Residential A and Proposed Residential B) contained in Table 9.1 within Section 9.2 of Chapter 9 – Strategic Objectives. It is considered important to offer variety of choice of homes in urban areas to meet specific needs in terms of house and plot size (such as for a larger family), as well as to offer appropriate alternatives to one off rural housing within the urban areas by facilitating the provision of detached dwellings within a settlement. County Monaghan is a rural County with historically lower urban residential densities than other more urbanised counties. In addition, County Monaghan has a higher rate of rural one off housing and it is an objective to address the imbalance between rural housing and urban housing. It is also an objective both within the National Planning Framework (National Policy Objective 18b) and the Regional Spatial and Economic Strategy for the Northern and Western Region (Regional Policy Objective 3.7) to facilitate the provision of serviced sites. The Proposed Residential B zoning will facilitate the development of serviced sites and detached dwellings which would not normally be provided within housing developments, thereby offering an alternative to one off rural housing. The Proposed Residential B zoning will also facilitate the appropriate development of those sites with topographical issues where higher densities would result in a poor standard of development with numerous retaining walls and significant changes in levels, or where the normal minimum densities cannot be achieved, making these lands unviable to develop for housing. As the target densities in the revised Core Strategy Table 2.5 are based on average density across Proposed Residential A and Proposed Residential B zonings, the provision of lower densities associated with lands zoned Proposed Residential B does not affect the quantum of lands to be zoned.

O2 Include measurable and deliverable policy objectives within chapter 10 – 14 Settlement Plans for:

(i) Tier 1 – 3 settlements in respect of key areas for development, infrastructure priorities, natural and built heritage, key sustainable mobility priorities and any further relevant key future priorities; and

(ii) Monaghan Town in respect of key future priorities and implementation measures to support the achievement of RSES growth targets (RPO 3.1).

O2(i) Additional objectives are proposed to be included in Section 11.2 of Chapter 11 – Carrickmacross Town Settlement Plan, Section 12.2 of Chapter 12 – Castleblayney Town Settlement Plan, Section 13.3 of Chapter 13 – Clones Town Settlement Plan and Section 14.2 of Chapter 14 – Ballybay Town Settlement Plan in respect of key areas for development, infrastructure priorities, natural and built heritage, key sustainable mobility priorities and settlement specific priorities as indicated in the box below (new text in red).

Carrickmacross Settlement Plan Strategic Objective

CMSO 1	To promote Carrickmacross Town as a place of strategic potential at a regional level where the principles of environmental, economic and social sustainability including the protection of the town’s heritage and natural and built environment are enshrined.
CMSO 2	To ensure that the following priorities for the town are delivered within the lifetime of the development plan:- <ul style="list-style-type: none"> • the implementation of the Town Centre First Plan for the town • the preparation and implementation of a Local Transport Plan for the town • the incorporation of the Backlands Local Area Action Plans and Convent Lands Master Plan within the County Development Plan by way of variation and the obtaining of all necessary consents for the progression of these plans • the preparation of a feasibility study in respect of proposed road links within the town

Castleblayney Settlement Plan Strategic Objective

CBSO 1	To promote Castleblayney as a prosperous and thriving town where the principles of environmental, economic, and social sustainability including the protection of the town’s heritage and natural and built environment are enshrined.
CBSO 2	To ensure that the following priorities for the town are delivered within the lifetime of the development plan:- <ul style="list-style-type: none"> • the progression of the Masterplan and Development Framework for Lough Muckno and Environs • the incorporation of the Town Centre Regeneration Plan within the County Development Plan by way of variation and the obtaining of all necessary consents for the progression of this plan • the preparation and implementation of a Sustainable Urban Mobility Plan for the town • the preparation and implementation of a Town Centre First Plan for the town • the preparation of a feasibility study in respect of proposed road links within the town

Clones Settlement Plan Strategic Objective

CLSO 1	To promote and develop Clones as a service town to create a self-sufficient sustainable and vibrant community which will act as a local economic and service centre for the Border and the West Monaghan catchment hinterlands whilst protecting the significant built and archaeological heritage of the town
CLSO 2	To ensure that the following priorities for the town are delivered within the lifetime of the development plan:- <ul style="list-style-type: none"> • the preparation and implementation of a Sustainable Urban Mobility Plan for the town • the preparation and implementation of a Town Centre First Plan for the town • the preparation of a feasibility study in respect of proposed road links within the town

Ballybay Settlement Plan Strategic Objective

BBSO 1	To promote and develop Ballybay Town to create a self-sufficient, sustainable and vibrant community which will act as a local employment and service centre for the Mid Monaghan hinterland.
BBSO 2	To ensure that the following priorities for the town are delivered within the lifetime of the development plan:-

	<ul style="list-style-type: none"> • the preparation and implementation of a Sustainable Urban Mobility Plan for the town • the preparation and implementation of a Town Centre First Plan for the town • the preparation of a feasibility study in respect of proposed road links within the town
--	---

O2(ii) An additional objective is proposed to be included in Section 10.2 of Chapter 10 – Monaghan Town Settlement Plan, for Monaghan Town in respect of key future priorities and implementation measures to support the achievement of RSES growth targets (RPO 3.1) are proposed as indicated in the box below (strike through is deleted text with new text in red).

Monaghan Town Settlement Plan Strategic Objectives	
MTSO 1	To facilitate the development of Monaghan Town to maintain its position as the Principal/Key Town in the County at the top of the settlement hierarchy and to ensure that its expansion takes place in an orderly and sustainable fashion that will not detract from the vitality and viability of its town centre.
MTSO 2	<p>To ensure that the following priorities for the town are delivered within the lifetime of the development plan:-</p> <ul style="list-style-type: none"> • the implementation of the Dublin Street South Regeneration Plan, Dublin Street North Regeneration Plan, and Roosky Lands Master Plan • the preparation and implementation of a Master Plan for the Saint Louis Convent lands • the development of the Industry, Enterprise and Employment lands at Annahagh and Tullyherim • the implementation of the Town Centre First Plan for the town • the preparation and implementation of a Local Transport Plan for the town • the preparation of a feasibility study in respect of proposed road links within the town • the implementation of the Monaghan Drainage Area Plan • an annual increase in population by a minimum of 100 persons per annum in order to achieve the growth targets set out for the town within both the National Planning Framework and the Regional Spatial and Economic Strategy for the Northern and Western Region.

R5(i) Detail in the core strategy the area of land in each settlement that will contribute to compact growth including 30% within the built-up footprint in Tiers 1 – 3, and 20% on brownfield lands within Tier 4 – 6, and the anticipated housing yield from compact growth for each settlement

R5(i) The proposed revised Core Strategy Table 2.5 after Section 2.10 in Chapter 2 – Core Strategy details the area of land in each settlement that will contribute to compact growth, which exceeds the requirement for 30% of development to occur within the built-up footprint in Tiers 1 – 3 settlements. The proposed revised Core Strategy Table 2.5 also details the anticipated housing yield from compact growth for each settlement. The Dublin Street North and Dublin Street South Regeneration Plans and Roosky Lands Master Plan are referenced in Section 2.7 of Chapter 2 Core Strategy as contributing to compact growth given that residential development forms part of these projects, as indicated in the box below (strike through is deleted text with new text in red).

2.7 Regeneration of Existing Lands

It is considered appropriate to include for the reuse, regeneration and renewal of land through active land management over this Plan period, having regard to legislative requirements, and to national and regional policy. The NPF target of delivering 30% of new housing within the existing built-up footprint of settlements, on infill and brownfield lands and the principles contained within the Town Centre First Policy are key considerations in this regard. The regeneration of land (as defined by the Urban Regeneration and Housing Act 2015) and buildings in need of development and renewal throughout the County, is an objective of this development plan and Monaghan County Council will seek to develop and improve areas in need of development and renewal, particularly within designated settlements.

Monaghan County Council has been proactive in regeneration initiatives in recent years, particularly in respect of delivering residential development within town centres such as the award winning Clones Renewal Scheme. There has been significant advancement of the Dublin Street South Regeneration Plan in Monaghan Town with consent having been recently obtained for the development of infrastructure on these lands. This scheme along with the Dublin Street North Regeneration Plan and the Roosky Lands Master Plan have potential to deliver housing within the urban core and thus contribute to compact growth and significant funding from the Urban Regeneration Development Fund has been secured in relation to progressing these schemes. The recent acquisition of the Saint Louis Convent lands within the town by Monaghan County Council also provides opportunity for regeneration and town centre development. In Carrickmacross, the Backlands Plans either side of the Main Street and the initiatives for Distillery Lane / Convent Lands will contain residential development, thus contributing to the delivery of compact growth in this town. In Castleblayney, the Town Centre Regeneration Plan and the Masterplan and Development Framework for Lough Muckno and Environs will also greatly assist in delivering compact growth.

It is therefore important to acknowledge that a proportion of future urban development will occur on infill/brownfield/regeneration lands within the built envelope of existing settlements. However, it should be noted that the delivery of the entirety of these schemes will likely fall outside the period of this development plan given the period of time involved in agreeing proposals, obtaining consents, assembling lands, providing enabling infrastructure before development is delivered. Notwithstanding this, these schemes are advancing and will contribute greatly to town centre regeneration and compact growth.

In order to encourage this type of development within the urban centres, a relaxation of some development management standards will be considered where appropriate. ~~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. Therefore, the amount of greenfield lands required to be zoned for residential use is based on 80% of the population growth. This has been reflected in the Core Strategy Table 1.~~

In respect of Tier 4 – 6 settlements, only the Tier 4 settlements have defined settlement envelopes, which are drawn around the built up established footprint of each of the settlements to encourage consolidation of existing development and the development of brownfield sites, such as redundant farm yards within these settlements, and thus promote compact growth and regeneration. This will encourage a minimum of 20% of development occurring on brownfield lands in these settlements.

Although the Tier 5 and 6 settlements do not have settlement envelopes drawn around them, the policies and objectives set out in Section 2.11 of Chapter 2 – Core Strategy relating to these settlements quite clearly encourage brownfield development, sequential development from the centre outwards, and infill development to promote consolidation and rounding off of these small villages.

R5(ii) Identify on the zoning maps for Tier 1 – 3 settlements regeneration / masterplan / opportunity sites to clarify the priority areas for town centre regeneration and renewal.

R5(ii) Regeneration / masterplan / opportunity sites have been identified on the zoning maps for the Tier 1 – 3 settlements to clarify the priority areas for town centre regeneration and renewal.

O3 Update the Housing Need Demand Assessment 2022-2031 having regard to the outcome of Recommendation 1, in order to correlate and accurately align future housing requirements.

O3 Although it is intended to update the Housing Need Demand Assessment 2022-2031 having regard to the revised Core Strategy Table 2.5 after Section 2.10 in Chapter 2 – Core Strategy to ensure it correlates with and accurately aligns with future housing requirements, it is considered that this should be comprehensively done, which is not possible given the limited time scale available in the development plan process. Therefore, it is proposed to comprehensively review and update the Housing Need Demand Assessment 2022-2031 following adoption of the Development Plan and an updated Chapter 3 – Housing Strategy will be included within the development plan by way of variation. Notwithstanding the above, Chapter 3 – Housing Strategy has been amended as indicated in the box below (strike through is deleted text with new text in red) to take account of the revised Core Strategy.

3.4.1 Population

Appendix 2 of the National Planning Framework Implementation Roadmap includes transitional regional and county population projections up to 2031. Figures for County Monaghan are illustrated in Table 3.1 below:

Table 3.1: Transitional Regional and County Population Projections to 2031

County	Census 2016	Census 2022	Projection 2026	Projection 2031
Monaghan	61,386	65,288	67,000-68,000	69,000-71,000

Source: Implementation Roadmap for the National Planning Framework, 2018.

With a 2022 population of 65,288 persons, the population growth in the County is roughly in line with progression towards the NPF targets, albeit at the lower end of the estimated range.

3.4.2 Housing

The database sheet accompanying the Housing Supply Target Methodology Guidelines, provides projected annual figures for new household demand in each local authority area up to the year 2031. For County Monaghan, the housing demand for the **development plan** period ~~2020-2031~~ is **3,668** ~~2,558~~. Table 31 of the database sheet accompanying the Housing Supply Target Methodology Guidelines set out in Table 3.2, indicates the number of new houses required ~~between 2020-2031 inclusive~~ **for the development plan period**, to enable the County to meet the Economic and Social Research Institute (ESRI) NPF new household demand up to 2031.

Table 3.2: Housing Supply Target County Monaghan

	Monaghan County Council	Annual Average Households	Total Households
A	ESRI NPF scenario projected new household demand 2017 to Q2 2031	280 268	4,197 4026
B	Actual new housing supply 2017 to 2019 Q3 2024	185 228	556 1769
C	Homeless households, and estimated unmet demand as a Census 2016 2022	N/A	27 301
D	Housing Demand 202 5 -2031= Total (A-B+C)/ 126	306 426	3,668 2558

Source: Housing Supply Target Methodology for Development Planning - Guidelines for Planning Authorities, 2020 & Central Statistics Office

3.13 Urban Housing

The Core Strategy sets out the total housing requirement for the County in order to satisfy the population growth of 6,228 persons that is provided for during the lifetime of this plan.

The Core Strategy allocates the future supply of urban housing units in respect of Tier 1, 2, 3 and 4 settlements. These locations have suitable capacity in physical and social infrastructure to accommodate anticipated urban population growth circa 90 83 hectares of land is zoned for residential purposes within the designated settlements, which will be plan led and delivered through the provision of settlement plans for each of the towns and the villages collectively.

3.14 Residential Density

National policy seeks to encourage more sustainable development through the avoidance of excessive suburbanisation and the promotion of higher densities. The Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (DHLGH, 2024) references this. For the purposes of ascertaining a suitable housing land requirement for County Monaghan and having regard to the above, the Core Strategy within this Development Plan has considered it appropriate to apply a gross density of 18 30 units per hectare within the larger settlements (Key and Large towns), 15 25 units per hectare (gross) in the medium settlements (Medium and Small towns), and 10 20 units per hectare (gross) in the smaller settlements (Rural town and Villages). It is considered that this is both practical and realistic for the urban settlements of County Monaghan where most of the sites suitable for new residential development have, in the main, extensive topographical challenges.

3.16.5 Housing Land Supply

The HNDA determined that that circa 2,790 new dwellings are required in the County by 2031. The Core Strategy Table 2.5 (refer to Section 2.10 in Chapter 2 Core Strategy indicates that this Development Plan allocates approximately 90 83 hectares for residential use, which represents sufficient provision to accommodate the calculated housing demand while allowing for a degree of locational choice. Where land is zoned for development, it is on the basis of a detailed Infrastructural Assessment (IA) and Settlement Capacity Audit (SCA) in Appendix 16 to support its suitability for development during the Plan lifetime in terms of servicing and potential housing yield.

R6(i) Provide that all New Residential is required to be compliant with the residential density standards set out in the Sustainable Residential Development for Urban Areas, Guidelines for Planning Authorities (2009).

R6(i) It is considered important to offer variety of choice of homes in urban areas to meet specific needs in terms of house and plot size (such as for a larger family), as well as to offer appropriate alternatives to one off rural housing within the urban areas by facilitating the provision of detached dwellings within a settlement. County Monaghan is a rural County with historically lower urban residential densities than other more urbanised counties. In addition, County Monaghan has a higher rate of rural one off housing and it is an objective to address the imbalance between rural housing and urban housing. It is also an objective both within the National Planning Framework (National Policy Objective 18b) and the Regional Spatial and Economic Strategy for the Northern and Western Region (Regional Policy Objective 3.7) to facilitate the provision of serviced sites. The Proposed Residential B zoning will facilitate the development of serviced sites and detached dwellings which would not normally be provided within housing developments, thereby offering an alternative to one off rural housing. The Proposed Residential B zoning (Objective LUO 4 in Table 9.1 within Section 9.2 of Chapter 9 – Strategic Objectives for Settlements) will also facilitate the appropriate development of those sites with topographical issues where higher densities would result in a poor standard of development with numerous retaining walls and significant changes in levels, or where the normal minimum densities cannot be achieved, making these lands unviable to develop for housing. The Proposed Residential B

zonings in the five Tier 1-3 settlements are mostly located on the outer edge of the settlement where it is accepted in the Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities (2024) that densities may be lower. Furthermore, with the exception of a few small parcels of lands, the zoned Proposed Residential B lands are located within the Built Up Area of the five Tier 1-3 settlements as defined by the CSO. As Figure 3.1 within the Guidelines indicates that detached /semi detached housing will be in the range of 15-30 dwellings per hectare, the density for Proposed Residential B lands set out in Section 15.8.8 of Chapter 15 – Development Management Standards is proposed to be revised upwards to 15 units per hectare in keeping with the Guidelines as indicated in the box below (strike through is deleted text with new text in red).

15.8.8 Low Density Residential Development on lands zoned as ‘Proposed Residential B’

An application for low density residential development, including serviced sites, ~~of up to a maximum of 50 detached dwellings or plots,~~ at a maximum density of ~~10~~ **15** units per hectare (unless where site specific circumstances can justify otherwise), will be permitted by the Planning Authority on lands zoned as ‘Proposed Residential B’. ~~in the following circumstances:~~

- ~~• Where not more than 50% of all lands zoned as Proposed Residential B in the settlement in which the application is sited, have neither been developed or have the benefit of extant planning permission,~~
- ~~• Where the applicant, either acting alone, or in partnership/in concert with others, has already obtained planning permission for residential development under this policy on zoned Proposed Residential B lands, and where substantial works have been carried out on more than 50% of the permitted residential units, and~~
- ~~• The development represents sustainable and efficient use of existing infrastructure and services or of proposed infrastructure for which funding has already been secured.~~

It should also be noted that Section 15.8.8 does explicitly state that site-specific circumstances may be used to justify a higher density. Notwithstanding the above, the average residential densities set out in the revised Core Strategy Table 2.5 after Section 2.10 in Chapter 2 – Core Strategy, which is inclusive of the lower density Proposed Residential B zonings, is within the density ranges set out in these Guidelines and therefore would not be contrary to the objective of promoting compact form.

R6(ii) Define parking standards in the County Development Plan as maximum standards.

R6(ii) Table 15.6 and Section 15.24 of Chapter 15 – Development Management Standards are proposed to be amended to state that the car parking standards provided are maximum standards in the box below (strike through is deleted text with new text in red).

All developments shall be required to provide within the site suitable provision for servicing, parking and manoeuvring of vehicles associated with the proposal, **except where it is determined by the planning authority, having regard to the type of the development, its location, and proximity to transport alternatives, that the provision of servicing, parking and manoeuvring of vehicles would not be in the interests of urban regeneration, infill / brownfield and compact growth nor promote the uptake and use of sustainable modes of transport. The provision of a lower standard of car parking will be acceptable where justified in accordance with Policy SPPR 3 – Car Parking of the Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities (2024).** The ~~minimum~~ **maximum** car parking requirement shall be calculated in accordance with the standards as laid out in Table 15.6 Car Parking Standards below.

Table 15.6 Car Parking Standards

Land Use Classification	Minimum	Maximum	Car Parking Standard
Dwelling	2		per unit
Apartment (1 – 2 bed)	1.5		per unit
Apartment (3 – 4 bed)	2		per unit
Nursing Home/Hospital	1		per staff member 1 per bedspace which includes parking for ambulance and service lorries
Health Centres/Surgeries/Clinics	1		per staff member 1 per consulting room
Veterinary Services	1		per staff member 1 per consulting room Which includes parking for larger vehicles and trailers
Sheltered Accommodation for elderly/disabled	1		per bedspace
Retail/Service Station	1		per 15m ² GFA* 1 per HGV fuel pump
Retail Warehouse/Factory Retail Unit	1		per 30m ² GFA
Office/Financial and Professional Services	1		per 25m ² GFA
Schools	1		per teaching staff 1 space per classroom plus circulation and set down/pick-up area to cater for school operations.
Cinema/Theatre/Community Hall/Church Hall/Place of Worship/Amusement Centre	1		per 30m ² GFA
Leisure Centre/Sports Club	1		per 100m ² GFA
Hotel/Guesthouse/B&B	1		per bedroom (plus requirement for other uses e.g. bar/restaurant) Facilities are required for pick up and set down areas for cars and coaches, where appropriate.
Cafe/Bar/Lounge/Restaurant	1		per 20m ² GFA
Disco/Function Room/Conference Centre	1		per 10m ² GFA
Car Wash	5		waiting spaces per site without interference to other spaces or public road
Take Away	1		per 20m ² GFA
Drive Through			Minimum length of drive through queue should accommodate 10 no cars without interference to other spaces or public road
Industry	1		per 50m ² GFA Facilities are required for the parking and turning of vehicles servicing the development
Storage/Distribution/Warehouse/Cash and Carry	1		per 200m ² GFA Facilities are required for the parking and turning of vehicles servicing the development
Garage/Showroom	1		per 100m ² GFA
Student Accommodation	1		per 3 student beds
Garden Centres	1		per 60m ² GFA

Creches	1 per 6 children and 1 per staff including circulation and pick up and set down facilities
Funeral Home	1 per 20m ² GFA
Golf Course/Pitch and Putt	2 spaces per hole
Golf Driving Range	1 per bay
Caravan/Glamping/Camping Site	1 space per pitch
Hostel	1 space per 2 bedrooms or 1 space per 10 bed dormitories

It should also be noted that a reduction of up to 50% of the standards required in Table 15.6 for new developments or redevelopment of infill/brownfield/derelict sites located within the designated town centres where appropriate has already been provided for in the draft development plan in Section 15.24 of Chapter 15 – Development Management Standards are. Given the rural nature of County Monaghan, the limited provision of public transport services and facilities (Monaghan is only town with a bus station and no rail network), and the fact that Active Travel measures are only beginning to be rolled out within the County, the text is proposed to be amended to state that the provision of a lower standard of car parking will be acceptable where justified in accordance with Policy SPPR 3 – Car Parking of the Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities (2024) as indicated above.

R6(iii) Include an additional policy objective to provide for car-free developments for specified development types in appropriate contexts to facilitate urban regeneration, infill / brownfield and compact growth.

R6(iii) In respect of facilitating car-free developments for specified development types in appropriate contexts to facilitate urban regeneration, infill / brownfield and compact growth, additional text is proposed to be inserted within Section 15.24 of Chapter 15 – Development Management Standards (as indicated in the box above with strike through being deleted text and new text in red) to facilitate this type of development, subject to justification having regard the rural nature of County Monaghan, the limited provision of public transport services and facilities, and the fact that Active Travel measures are only beginning to be rolled out within the County. It should be noted that the Development Contribution Scheme for County Monaghan also facilitates the option of not providing car parking spaces within developments.

R6(iv) Review the public open space and private open space standards to ensure consistency the Compact Settlements Guidelines.

R6(iv) Chapter 15 – Development Management Standards is proposed be amended to ensure that all new residential development is compliant with the residential density standards set out in the Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities (2024), specifically Policy and Objective 5.1 – Public Open Space. The text of Section 15.8.12 in this Chapter is proposed to be amended to clarify that public open space provision should be not less than a minimum of 10% of net site area and not more than a minimum of 15% of net site area in accordance with the Guidelines, save in exceptional circumstances. Table 15.2 is proposed to be amended in the box below (strike through is deleted text with new text in red).

Public open space shall be provided in accordance with the standards set out in the Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities (2024), specifically Policy and Objective 5.1 – Public Open Space. In addition to these standards, Table 15.2 below outlines the minimum required open space and/or recreational facilities for multi-use-unit residential developments, according to unit numbers.

Table 15.2 Recreational Facilities and Public Open Space Standards

Number of Dwelling Units	10% Open Space	15% Open Space	Formal Play Area	Playing Pitch	Recreational Changing Facilities
Brownfield	Yes				
0-40		Yes			
41-150		Yes	Yes		
151-200		Yes	Yes	Yes	
>200		Yes	Yes	Yes	Yes

The above Recreational Facilities and Public Open Space requirements are a higher standard than those prescribed in the Ministerial Guidelines **and are applicable** having regard to the pattern of development of County Monaghan’s settlements and the need to ensure high quality environments.

Chapter 15 – Development Management Standards is proposed be amended to ensure that all new residential development is compliant with the residential density standards set out in the Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities (2024), and the Sustainable Urban Housing: Design Standards for New Apartments Guidelines (2022). It is proposed to remove Table 15.3 and amend the text in Section 15.8.13 as indicated in the box below (strike through is deleted text with new text in red).

~~Table 15.3 below outlines the minimum private open space requirement for residential units.~~

Table 15.3 Private Open Space Standards

Development Type and Size	Minimum Private Open Space Standard (Square metres)
Greenfield Site	
Houses – 1 and 2 Bed	50
Houses – 3+ Bed	70
Apartment	15
Town Centre	
House	50
1/2 bed Apartment	10
3+ bed Apartment	15

~~The above Private Open Space requirements are a higher standard than those prescribed in the Ministerial Guidelines having regard to the pattern of development of County Monaghan’s settlements.~~ **for all new residential development shall be in accordance with the standards set out in the Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities (2024), and the Sustainable Urban Housing: Design Standards for New Apartments Guidelines (2022).**

R7 Identify in the Monaghan County Development Plan 2025-2031 the use of particular areas for traveller accommodation, including the identification of specific locations in the land use zoning maps for the county.

R7 The traveller accommodation site at Gortakeegan on the edge of Monaghan Town is proposed to be detailed on the land use zoning map.

R8 Clarify whether the population growth projected for the Tier 4 serviced villages of Clontibret and Oram can be accommodated during the plan period due to potential infrastructure constraints.

R8 It is acknowledged that there are potential infrastructure constraints in the terms of capacity to treat waste water from additional development in the villages of Clontibret North and Oram. However, it is important that the small scale residential development that would be associated with these villages is not stymied. Both Oram and Clontibret North are included within the Small Towns and Villages Growth Programme and it is anticipated that extra capacity for the small scale development will be provided for over the lifetime of the Development Plan. In respect of Oram there are proposals to pump waste water generated in the village to the recently upgraded Castleblayney Waste Water Treatment Plant. Uisce Éireann has stated in its submission on the draft development plan that the project to connect into the Castleblayney agglomeration is at the design stage and envisaged to be completed within the lifetime of the Development Plan, subject to the necessary approvals and funding availability. The population targets for these villages as set out in the revised Table 2.4 above indicates a small growth of 15 persons for Clontibret North and 18 persons for Oram between 2022 and the end of the plan period. This equates to approximately 10 persons for Clontibret North and 12 persons for Oram over the Development Plan period 2025-2031. Any proposals for residential development within these villages will be subject to assessment under the Development Management process, particularly in respect of the ability to properly dispose of waste water.

R9(i) Provide proactive measures to ensure that the 20% target for the delivery of all new housing in rural areas on brownfield sites can be achieved, including the provision of serviced sites.

R9(i) The draft County Development Plan 2025-2031 already includes objectives and policies that encourage and facilitate the refurbishment and reuse of vacant and derelict properties, particularly for housing. These include within Chapter 15 – Development Management Standards in Section 15.9.3 Policy RRDP 1 – Restoration and Replacement of Vernacular and Non-Vernacular Buildings and Dwellings, and in Section 15.9.4 Policy RIDP 1 – Ribbon Development and Infill Development which allows for a dwelling house to be permitted on the site of a derelict building. Other opportunities are detailed in Objective RSO 2 within Chapter 2 – Core Strategy such as the redevelopment of previously developed residential sites and former homesteads, and the redevelopment of sites containing industrial or agricultural buildings. In addition, the current County Development Plan requirement to demonstrate a dwelling to be replaced in a Rural Area Under Strong Urban Influence was last used as a dwelling in the last ten years is proposed to be removed from Policy RSP 7 to encourage the redevelopment of these brownfield sites.

R9(ii) Provide timeframes for the delivery of Tier 4 village plans and clarify that in addition to the village plans focussing on housing, amenity, infrastructure and parking provision, sustainable reuse and regeneration will also be addressed.

R9(ii) Objective SHO 5 within Section 2.6.4 in Chapter 2 – Core Strategy is proposed to be amended as indicated in the box below (strike through is deleted text with new text in red).

Villages Objective	
SHO 5	To prepare Tier 4 village plans during the lifetime of this plan, with a focus on housing, amenity, infrastructure, and parking provision transport and the sustainable reuse and regeneration of existing derelict, vacant, or underutilised sites. At least one village plan will be prepared for a village in each of the three Municipal Districts per annum.

The text within Section 9.15 and Objective VIO 4 within Section 9.15 in Chapter 9 – Strategic Objectives for Settlements is also proposed to be amended as indicated in the box below (strike through is deleted text with new text in red).

In recognition of the importance of Tier 4 villages in sustaining the vitality of rural communities, it is an objective of the Development Plan to prepare Tier 4 Village Plans during the lifetime of the Development Plan. It is envisaged that these plans will be delivered on a strategically phased basis following agreement with the Elected Members of Monaghan County Council. Community engagement will be a key element to enable interested parties to become involved in shaping the future of these villages and influence how their communities grow and develop.

Tier 4 Villages Objectives	
VIO 4	To prepare plans for the Tier 4 villages plans during the lifetime of this plan, which with a focus on housing, amenity, infrastructure, parking provision and traffic calming transport during the lifetime of this plan, subject to available resources. and the sustainable reuse and regeneration of existing derelict, vacant, or underutilised sites. At least one village plan will be prepared for a village in each of the three Municipal Districts per annum.

O4(i) Review the range of uses open for consideration with the Community Facilities and Services zoning.

O4(ii) amend the land use zoning matrix to not normally permit uses which are incompatible with the primary objective of the zone such as residential development.

O4(i) & O4(ii) The range of uses open for consideration within the Community Facilities and Services zoning has been reviewed and the land use zoning matrix is proposed to be amended to 'not normally permitted' in respect of residential development within this zoning as indicated in the box below (strike through is deleted text with new text in red).

Development Type	TC	ER	PR	SR	IE	EC	CS	RA	LPC
Residential	✓	✓	✓	O	X	X	⊖X	X	X

R10(i) Provide robust justification for the extent and location of Employment zoned land and to demonstrate that the criteria of the aforementioned national policy have been satisfied, and specifically in respect of the following Employment zonings:

(a) Lands west of Carrickmacross along the R178

(b) CB IEE13

(c) CB IEE24

R10(i) Robust justification for the extent and location of Employment zoned land to demonstrate that the criteria of national policy has been satisfied in respect of the following Employment zonings is set out below: -

(a) Lands west of Carrickmacross along the R178

Carrickmacross is strategically located close to the M1 Motorway link at Ardee approximately 80km north of Dublin, 35km south of Monaghan Town and 21km west of Dundalk and is the main town in the south of the County located along the Dublin to Derry (N2) National Route. The town serves the economic needs of a large rural hinterland, which extends into counties Cavan, Meath, Louth and Armagh. In recognition of its role in providing employment, housing and services for the south of the County, Carrickmacross is designated as a town with strategic potential on a regional scale in the Regional Spatial and Economic Strategy for the Northern and Western Regional Assembly Area. In this context it is of strategic economic importance that sufficient economic and employment lands are zoned for the town in spatially appropriate locations to ensure that it can fulfil its economic role and continue to grow in a sustainable manner. The location of these lands has been determined by a number of factors including topography, suitable access for this type of development, and adjoining

uses having regard to potential emissions from this land use type. Having regard to this, viable areas of zoned Industry, Enterprise and Employment lands are spatially distributed around the town. This spatial distribution of employment lands will also facilitate the uptake of active travel as a means of travelling to places of work.

It should be noted that it is proposed to discontinue the zoning of a significant quantum of lands in the northern end of the town currently zoned Industry, Enterprise and Employment (IEE) in the County Development Plan 2019-2025. During the formulation of the draft development plan 5.3 hectares of zoned IEE lands east of Ballybay Road and 31.2 hectares of zoned IEE lands east of N2 were determined to be Tier 2 lands under the Infrastructure Assessment, and thus were not proposed to be zoned in the draft development plan. Furthermore, having considered submissions and observations in respect of the draft development plan, it is now proposed to discontinue the zoning of a further 7 hectares of lands zoned IEE West of Ballybay Road.

Having regard to the above proposed discontinuation of the zoning of 44 hectares of currently zoned IEE lands, the proposed zoning of the lands west of Carrickmacross located on the R178 regional road are accorded greater significance in enabling the delivery of economic development. Therefore, the zoning of these 12 hectares of undeveloped lands in the draft development plan are necessary to offset the loss of those lands not being continued to be zoned IEE going forward.

The lands are located on the R178 regional road to Shercock, which is part of the route of the proposed East West Link between Sligo and Dundalk as set out in in the Regional Spatial and Economic Strategy for the Northern and Western Regional Assembly Area, and are strategically located to benefit from the delivery of improvements to this road.

As part of the lands comprise of an existing employment use and a former football pitch, they benefit from favourable topography for the scale of development and site requirements associated with employment lands, which generally require larger sites to facilitate industrial buildings with large footprints and sufficient circulation space for heavy goods vehicles. In addition, the lands are located less than 900 metres from the town centre and there is already existing employment uses operating at this location, which further employment uses can agglomerate with.

In terms of servicing, a public foul sewer is located to the immediate east of the zoned lands, a public footpath and streetlighting, a public water mains and a public storm sewer are located approximately 200 metres to the east of the zoned lands, and there is the ability to extend the public footpath, street lighting and any other services along the grass verge to the north of the road to connect both the existing employment use and the additional lands to the existing public services. A number of high voltage electricity distribution lines pass through the lands and an electricity sub station is located approximately 50 metres to north east of the lands.

Therefore, for reasons of appropriate spatial distribution of employment lands in the town, proximity to the town centre, proximity to residential areas, proximity to existing and proposed transport routes, and existing topography, these lands are considered to form a critical land bank for employment uses. It is considered that these lands offer a viable option for delivery of industrial and employment development in Carrickmacross and thus are proposed to be retained as IEE in the draft development plan zoning.

(b) CB IEE1

In terms of the lands identified in the Infrastructure Assessment as CB IEE1 a significant amount of these lands along Milehill Road which are located away from existing enterprises and in a peripheral location outside Built Up Area of Castleblayney were dezoned in the draft development plan. Compared to other towns in the County, Castleblayney has high quantum of existing operating Industry, Enterprise and Employment premises and therefore a significant portion of the zoned lands are already occupied by existing employment uses. The dezoning of any further Industry, Enterprise and Employment lands could be result in insufficient quantum of zoned lands for new employment developments over the lifetime of the development plan.

(c) CB IEE2

In terms of the lands identified in the Infrastructure Assessment as CB IEE2 it is important to retain zoning of these lands as Industry, Enterprise and Employment given their proximity to the urban core and existing employment uses contained within them, and also as they are located mostly within Built Up Area of Castleblayney. Although part of these lands are identified at risk of flooding, the source of this flood risk is pluvial rather than fluvial. Given that the Office of Public Works has specifically stated in its submission on the draft development plan in respect of these lands that “Flood Zones represent flooding from fluvial and coastal sources only” the impact from the potential pluvial flood risk is a matter that that can be assessed under the development management process, particularly as the land use proposed is one that involves buildings used for retail, leisure, warehousing, commercial, industrial and non-residential institutions which are considered by the Planning System and Flood Risk Management Guidelines (2009) as less vulnerable developments.

R10(ii) Demonstrate that lands identified as Tier 2 as defined in appendix 3 A Methodology for a Tiered Approach to Land Zoning of the NPF, in the Infrastructure Assessment are realistically serviceable within the plan period, including a reasonable estimate of the full cost of delivery of the required infrastructure.

R10(ii) A review of the Infrastructural Assessment in Appendix 16 was carried out in consultation with Uisce Éireann and relevant Sections within the Council. This review determined that some of the lands identified in the draft development plan as Tier 2 lands are in fact Tier 1 lands and these have been indicated in the revised Infrastructure Assessment. Other Tier 2 lands are proposed to be dezoned, while for the limited number of remaining Tier 2 lands an assessment was carried out in relation to the feasibility of providing infrastructure to these lands. This was on the basis that if it is possible to service the lands with a limited extension of infrastructure, then these services will be provided at the developer’s expense. Given that costs estimated provided now will not be applicable in the future, it is considered that this is a more reasonable and rational approach rather than estimating of the full cost of delivery of the required infrastructure to the identified zoned lands to clarify if Tier 2 zoned lands are serviceable within the plan period. Only those Tier 2 lands where it has been determined that infrastructure can be feasibly provided to these lands are proposed to be zoned for development. It should also be noted that Uisce Éireann has confirmed that it is not in a position to provide estimated costs for the provision of infrastructure to service lands.

R10(iii) Include a policy framework for the industrial development area at Lough Egish including specific objectives for Development Management and sustainable transport.

R10(iii) Notwithstanding Objective EDO 7 in Section 4.7 of Chapter 4 – Economic Development which promotes “the use of appropriate lands at Lough Egish for the development of employment generating, industrial and other such uses, including self-build units and the provision of serviced sites, to enhance and contribute to its growth as a centre for industrial development”, an additional objective is proposed to be inserted within this section to develop a policy framework for this industrial development area to include specific objectives for Development Management Standards and sustainable transport having regard to National Policy Objectives NPO10a, NPO10b and NPO23, and Regional Policy Objective RPO4.24 in the Regional Spatial and Economic Strategy for the Northern and Western Regional Assembly Area as indicated in the box below (new text in red).

EDO 8	To develop a policy framework for Lough Egish industrial development area within two years of the adoption of the development plan to include specific objectives for Development Management Standards and sustainable transport having regard to National Policy Objectives NPO 10b and NPO 23 in the National Planning Framework, and Regional Policy Objective RPO 4.24 in the Regional Spatial and Economic Strategy for the Northern and Western Regional Assembly Area.
--------------	---

R11 Amend the land use zoning matrix (table 9.3) to ensure that retail warehousing is not permitted on Existing Commercial zoned land.

R11 There is at least one operating use (existing retail park on the Clones Road, Monaghan) on lands zoned Existing Commercial that has the benefit of planning permission for retail warehousing. Therefore, the possibility of retail warehousing on this land use zoning is necessary to safeguard the continued operation of that existing retail park. Consequently, the land use zoning matrix (Table 9.3) in Chapter 9 – Strategic Objectives for Settlements is proposed to be amended from stating that retail warehousing on Existing Commercial zoned land is ‘acceptable in principle’ to state the use is ‘open for consideration’. However, it should be noted that this amendment to the zoning matrix does not overrule the presumption against out-of-town retail warehousing as set out in the Retail Planning Guidelines (2012) as indicated in the box below (strike through is deleted text with new text in red).

Development Type	TC	ER	PR	SR	IE	EC	CS	RA	LPC
Retail (Convenience)	✓	O	O	O	X	O	X	X	X
Retail (Comparison)	✓	X	X	X	X	O	X	X	X
Retail Warehouse	O	X	X	X	O	✓O	X	X	X

O5 Clarify at objectives TMO 8 and TMO 9 that tourism accommodation is encouraged in towns, and will only be acceptable in rural areas if it is location specific or resource based, to ensure consistency with NPO 16 of the NPF.

O5 Objectives TMO 8 and TMO 9 are broad objectives that support the provision of tourist accommodation, attractions and facilities in appropriate locations within the County. However, Objective TMO 9 specifically refers to Chapter 15 – Development Management Standards. Section 15.16 Tourism in this Chapter clearly states that “the Council shall encourage the provision of tourist accommodation and facilities in appropriate locations where the development is considered necessary to the nature and purpose of the proposed development and meets a clearly identified site-specific tourism need.” To provide further clarity on this matter the text in this Section is proposed to be amended to state that in the box below (new text in red).

“the provision of additional hotel and guest house bed spaces, bed and breakfast and self-catering accommodation within defined settlements will be encouraged and facilitated **in the first instance**”. It is considered that these objectives and the policy outlined in Section 15.16 are sufficient to clarify that tourism accommodation is encouraged in towns, and will only be acceptable in rural areas if it is location specific or resource based, ensuring consistency with NPO 16 of the National Planning Framework.

In light of this clarity Objective TMO 9 is proposed to be amended in the box below (strike through is deleted text).

TMO 9	To support and encourage the development of appropriately scaled alternative forms of tourism accommodation on suitable sites within the town subject to Chapter 15 Development Management Standards of the Monaghan County Development Plan 2025-2031.
--------------	--

O6 Include a map to show the location of quarries and minerals across County Monaghan.

O6 Given that the proper identification of the location of quarries and minerals across County Monaghan is a significant body of work requiring validation using the Section 261 and 261A quarry registers as well as an assessment of the undeveloped resources using geological information resources, an objective is proposed to be included within Section 4.9 of Chapter 4 – Economic Development which seeks to identify and map the location of quarries and minerals resources across

County Monaghan within the lifetime of the Development Plan as indicated in the box below (new text in red).

Extractive Industry Objectives	
MEO 3	To identify and map the location of quarries and minerals resources across County Monaghan within the first four years of the Development Plan.

R12(i) Prepare existing baseline figures for modal share and modal share targets for the county, Tier 1 – 3 settlements and aggregate figures and targets for the rural area (Tier 4 – 6) for the plan period.

R12(i) In relation to the preparation of existing baseline figures for modal share and modal share targets for the County, Tier 1 – 3 settlements and aggregate figures and targets for the rural area (Tier 4 – 6) for the plan period, accurate baseline data and realistic modal shift targets are not currently available for County Monaghan. Through the preparation of the Integrated Transport Plan, Local Transport Plans and Sustainable Urban Mobility Plans for the respective towns, baseline data will be available, and targets may be set. In the absence of establishing these baselines figures, national policy targets are the most relevant and applicable targets.

R12(ii) Provide timeframes for the preparation of the county-wide Integrated Transport Plan (ITP), LTPs for Monaghan Town and Carrickmacross, and sustainable mobility plans for Castleblayney, Clones and Ballybay.

R12(ii) Objective TP1 in Section 7.2 of Chapter 7 – Transport and Infrastructure relating to the preparation of the county-wide Integrated Transport Plan (ITP) is proposed to be amended to state that the ITP will be commenced by 2027 as indicated in the box below (strike through is deleted text with new text in red).

Transport Policies	
TP 1	To develop an Integrated Transport Plan for County Monaghan to provide a roadmap identifying strategic transport routes that will aim to connect towns, communities and rural areas. The plan will be prepared in collaboration with NTA, TII, DOT and local and national public transport providers, during the lifetime of this plan, subject to available resources. commencing by 2027.

Objectives MTO9 and CMO6 in Section 10.9 of Chapter 10 – Monaghan Town Settlement Plan and in Section 11.8 of Chapter 11 – Carrickmacross Town Settlement Plan respectively relating to Local Transport Plans (LTP) for Monaghan Town and Carrickmacross respectively is proposed to be amended to state that the LTP for Monaghan Town will be prepared by 2025 and the LTP for Carrickmacross will be commenced by 2026 using the Area Based Transport Assessment process as indicated in the box below (strike through is deleted text with new text in red).

Monaghan Roads and Traffic Management Objectives	
MTO 9	To prepare a Local Transport Plan for Monaghan Town using the Area Based Transport Assessment process , during the lifetime of this plan, subject to available resources by 2025.

Carrickmacross Roads and Traffic Management Objectives	
CMO 6	To prepare a Local Transport Plan for Carrickmacross Town using the Area Based Transport Assessment process , during the lifetime of this plan, subject to available resources commencing by 2026.

Objectives CBO5, CLO7 and BBO7 in Section 12.8 of Chapter 12 – Castleblayney Town Settlement Plan, Section 13.9 of Chapter 13 – Clones Town Settlement Plan and in Section 14.8 of Chapter 14 – Ballybay Town Settlement Plan respectively relating to Sustainable Urban Mobility Plans (SUMP) for Castleblayney, Clones and Ballybay respectively is proposed to be amended to state that the SUMP for Castleblayney will be commenced by 2026, the SUMP for Clones will be completed by 2025 and the SUMP for Ballybay will be commenced by 2026 using the Area Based Transport Assessment process as indicated in the box below (strike through is deleted text with new text in red).

Castleblayney Roads and Traffic Management Objectives	
CBO 5	To prepare a Sustainable Urban Mobility Plan for Castleblayney Town using the Area Based Transport Assessment process , during the lifetime of this plan , subject to available resources commencing by 2026 .
Clones Roads and Traffic Management Objectives	
CLO 7	To prepare a Sustainable Urban Mobility Plan for Clones Town using the Area Based Transport Assessment process , during the lifetime of this plan , subject to available resources completed by 2025 .
Ballybay Roads and Traffic Management Objectives	
BBO 7	To prepare a Sustainable Urban Mobility Plan for Ballybay Town using the Area Based Transport Assessment process , during the lifetime of this plan , subject to available resources commencing by 2026 .

Policy TP2 within Chapter 7 – Transport and Infrastructure has also been amended to reflect the timescales set out above as indicated in the box below (strike through is deleted text with new text in red). However, it should be noted that these timescales are subject to National Transport Authority funding and approval through necessary project approval guidelines and statutory processes

Transport Policies	
TP 2	To prepare Local Transport Plans using the Area Based Transport Assessments process in Monaghan Town and Carrickmacross, and Sustainable Urban Mobility Plans for the towns of Castleblayney, Clones and Ballybay during the lifetime first three years of this plan, subject to funding and available resources .

R12(iii) Provide for the translation of specific measures / proposals from the ITP, LTPs and sustainable mobility plans, once prepared, into the County Development Plan to give them statutory weight and provide clarity on the settlement zoning maps.

R12(iii) An additional objective (TO 9) relating to the incorporation of the county-wide Integrated Transport Plan (ITP) within the Development Plan by way of variation and the implementation of the objectives and measures is proposed to be inserted into Section 7.2 of Chapter 7 - Transport and Infrastructure as indicated in the box below (new text in red).

Transport Planning Objectives	
TO 9	To vary the Development Plan to incorporate the objectives and measures of Integrated Transport Plan for County Monaghan when finalised, and to implement its objectives and measures during the lifetime of this plan.

Objectives MTO10 and CMO11 in Section 10.9 of Chapter 10 – Monaghan Town Settlement Plan and in Section 11.8 of Chapter 11 – Carrickmacross Town Settlement Plan respectively had sought to implement a programme of measures to support and promote active travel in Monaghan Town and Carrickmacross respectively. These objectives are proposed to be amended to require implementation of the objectives and measures of the Local Transport Plans (LTP) as indicated in the box below (strike through is deleted text with new text in red).

MTO 14	To vary the Development Plan to incorporate the objectives and measures of the Local Transport Plan for Monaghan Town when finalised, and to implement its objectives and measures to support and promote active travel in Monaghan Town, during the lifetime of this plan, subject to funding and available resources.
CMO 11	To vary the Development Plan to incorporate the objectives and measures of the Local Transport Plan for Carrickmacross Town when finalised, and to implement its objectives and measures to support and promote active travel in Carrickmacross Town, during the lifetime of this plan, subject to funding and available resources.

Objectives CBO6, CLO8 and BBO8 in Section 12.8 of Chapter 12 – Castleblayney Town Settlement Plan, Section 13.9 of Chapter 13 – Clones Town Settlement Plan and in Section 14.8 of Chapter 14 – Ballybay Town Settlement Plan respectively had sought to implement a programme of measures to support and promote active travel in Castleblayney, Clones and Ballybay respectively. These objectives are proposed to be amended to require implementation of the objectives and measures of the Sustainable Urban Mobility Plans (SUMP) as indicated in the box below (strike through is deleted text with new text in red).

CBO 6	To vary the Development Plan to incorporate the objectives and measures of the Sustainable Urban Mobility Plan for Castleblayney Town when finalised, and to implement its objectives and measures to support and promote active travel in Castleblayney Town, during the lifetime of this plan, subject to funding and available resources.
CLO 8	To vary the Development Plan to incorporate the objectives and measures of the Sustainable Urban Mobility Plan for Clones Town when finalised, and to implement its objectives and measures to support and promote active travel in Castleblayney Town, during the lifetime of this plan, subject to funding and available resources.
BBO 8	To vary the Development Plan to incorporate the objectives and measures of the Sustainable Urban Mobility Plan for Castleblayney Town when finalised, and to implement its objectives and measures to support and promote active travel in Castleblayney Town, during the lifetime of this plan, subject to funding and available resources.

R13(i) Amend Objective REO 2 in chapter 8 to commit to the preparation of a renewable energy strategy for the County and to a variation of the County Development Plan to incorporate its recommendations into the adopted Plan within one year of the publication of the Methodology for Local Authority Renewable Energy or a regional renewable electricity strategy, whichever is the sooner.

R13(i) Objective REO 2 in Chapter 8 - Environment, Energy, and Climate Change is proposed to be amended to commit to the preparation of a renewable energy strategy for the County and to vary the County Development Plan to incorporate its recommendations into the adopted Plan within one year of the publication of the Methodology for Local Authority Renewable Energy Strategies or the Regional Renewable Electricity Strategy for the Northern and Western Region, whichever is the sooner as indicated in the box below (strike through is deleted text with new text in red).

Renewable Energy Objectives	
REO 2	To prepare a Renewable Energy Strategy for the County over the lifetime of this plan and subject to the availability of resources within one year of the publication of the Methodology for Local Authority Renewable Energy Strategies or the Regional Renewable Electricity Strategy for the Northern and Western Region, whichever is the sooner. Such a Strategy shall be shaped and informed by environmental considerations, constraints and sensitivities relevant to the Plan Area - including biodiversity, European sites, and landscape and visual amenity related designations.

R13(ii) Review the landscape character map in the County Development Plan in tandem with the preparation of the renewable energy strategy.

R13(ii) An objective is proposed to be inserted into Section 6.4 Landscape Character Assessment within Chapter 6 - Heritage, Conservation and Landscape to review the Landscape Character Assessment in tandem with the preparation of the Renewable Energy Strategy for County Monaghan as indicated in the box below (strike through is deleted text with new text in red).

Landscape Character Assessment Objective	
LCO 5	To review and update the Landscape Character Assessment in tandem with the preparation of the Renewable Energy Strategy for County Monaghan.

R13(iii) Amend section 15.20 in chapter 15 to ensure that Policy EGP 1 supports the protection of existing electricity and gas infrastructure, the development of a safe, secure and reliable supply of electricity and gas, and new transmission and distribution infrastructure, subject to the relevant policy and statutory requirements.

R13(iii) Section 15.20 within Chapter 15 – Development Management Standards advocates that the development of a secure and reliable electricity transmission/distribution infrastructure is a key factor for supporting economic development and attracting investment into an area. This section also highlights the importance of gas as an energy supply for industry, and potentially for residential properties. The need to accommodate electricity and gas infrastructure, just like any other type of development, must be balanced against a requirement to protect the environment and other acknowledged interests of public importance. Therefore, it is a policy of the Council to facilitate development involving electricity and gas infrastructure, provided that it does not detrimentally impact on the natural or man-made environment or on the character of its setting. The six assessment criteria (a-f) set out in Section 15.20 are considered reasonable, are based on sound planning principles, and are applicable elsewhere throughout the County Development Plan. On this basis these criteria reiterate what is contained within the remainder of the Development Plan and do not introduce any specific or additional policy tests for electricity and gas infrastructure.

R13(iv) Omit Policy EGP 2 in chapter 15.

R13(iv) NSO 8, NPO 54 and NPO 55 of the National Planning Framework and RPO 4.17 of the and the Regional Spatial and Economic Strategy for the Northern and Western Region highlight the strategic national and regional importance of new energy systems and transmission grids for a more renewables focussed energy generation system to enable the transition to a low carbon and climate resilient society. It is considered that Policy EGP 2 in Chapter 15 – Development Management Standards is not contrary to these national and regional objectives or to the Government’s energy security strategy, Energy Security in Ireland to 2030, or the requirements of Article 16(f) of the Renewable Energy Directive (EU) 2023/2413 in that it does not prohibit the provision of electricity transmission infrastructure, nor does it explicitly require that electricity transmission infrastructure

may only be provided by underground means. This policy requires that the developer considers the potential to deliver this infrastructure by underground means, as part of a detailed consideration and evaluation of all options available in delivering and providing this type of infrastructure before proposing overhead infrastructure. This method of assessing alternatives is a means of determining the most appropriate and sustainable form of delivering development. Furthermore, the latter half of this policy acknowledges the need for a safe, secure, reliable, economic, efficient and high-quality network, and in requiring the provision of mitigation measures accepts that impacts from the provision of this type of strategic infrastructure may be inevitable.

R14(i) Review and amend the Strategic Flood Risk Assessment to ensure that it is fully consistent with the Plan Making Justification Test as set out in the Flood Guidelines, all zoned lands that can accommodate vulnerable uses should be included.

R14(i) It should be stated from the outset that the SFRA has been reviewed/ revised and as per the recommendation put forward the Flood Zones have been revised to include only areas associated with OPW CFRAM and NIFM data (whereby NIFM data has been subject to checking / review by Monaghan CC staff to confirm the extents shown are consistent with local knowledge). Historical MCC data is retained for information and advisory purposes but does not form part of the defined Flood Zones, which are identified as Flood Zone A or B. This is reflected in the amended maps set out in the revised SFRA attached to this document. Any justification test that does not pertain to the revised Flood Zones has been removed. The green 'Flood Risk Areas' have been removed from the draft zoning maps 2025-2031.

The revised SFRA has included conclusions where justification tests have been satisfied. As such each Plan Making Justification Test applied has been satisfied for an exception to the sequential approach to be considered justified. If in this case the lands are undeveloped, then following the sequential approach substitution these lands have been rezoned for usage appropriate to the assessed level of flood risk. In the case where the lands are already developed and it has been considered appropriate to retain the zoning to reflect current usage, restrictions have been incorporated to ensure further infill development does not introduce people or property to flood risk areas. In the event where there is extant planning permission, restrictions might be incorporated to restrict potential development to that for which permission has already been granted, and should the planning permission lapse, consideration might be given to rezoning the lands for usage appropriate to the level of flood risk identified.

R14(ii) Review the identified undeveloped sites located within Flood Zone A and / or B and, where they do not pass the Plan Making Justification Test, rezone such lands in Flood Zone A for water compatible use, and in Flood Zone B for water compatible or substitute for a land use appropriate to the level of flood risk:

R14(ii) A review was carried out of the following undeveloped sites located within Flood Zone A and / or B and, where they do not pass the Plan Making Justification Test, they are proposed to be de-zoned or rezoned for a land use appropriate to the level of flood risk:-

Monaghan

(a) **MTFRA 24** – These lands are not located within the revised Flood Zones and thus, the zoning is proposed to be **retained**.

(b) **MTFRA 31** – These lands are proposed to be **de-zoned**.

(c) **MTFRA 34** – The affected portion of these lands is proposed to be **rezoned** as Landscape Protection / Conservation.

(d) **MTFRA 35** – The affected portion of these lands is proposed to be **rezoned** as Landscape Protection / Conservation.

(e) **MTFRA 37** – These lands are proposed to be **rezoned** as Landscape Protection / Conservation.

(f) **MTFRA 38** – These lands are now referred to as MT352 and MT359 in the updated SFRA. The affected lands are part of an existing church and associated grounds. The zoning of the lands as Community Services / Facilities reflects the current use of the lands and will facilitate the existing development/use on these lands. Having regard to the existing development/use on the affected lands there is no requirement to identify suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement. Thus, the zoning is proposed to be **retained**.

(g) **MTFRA 40** – These lands are proposed to be **dezoned**.

(h) **MTFRA 44** - The affected portion of these lands along the southeastern boundary of the lands is proposed to be **rezoned** as Landscape Protection / Conservation.

Carrickmacross

(i) **CMFRA18** – The affected portion of these lands is proposed to be **rezoned** as Landscape Protection / Conservation.

(j) **CMFRA19** – The affected portion of these lands is proposed to be **rezoned** as Landscape Protection / Conservation.

(k) **CMFRA24** – These lands are not located within the revised Flood Zones and thus, the zoning is proposed to be **retained**.

(l) **CMFRA25** - These lands are now referred to as CM752 in the updated SFRA. The affected lands are a small area within a wider area zoned for industry, enterprise and employment related uses. The affected lands have been the subject of a number of planning applications (Ref No. 17/331, 18/15, and 19/151) relating to a bus depot and these lands have now been developed. The zoning of the lands as Industry, Enterprise & Employment will be essential in achieving compact and sustainable urban growth, and will facilitate the established development/use on these lands. Having regard to the established use of the lands there is no requirement to identify suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement. Thus, the zoning is proposed to be **retained**.

(m) **CMFRM26** - These lands are now referred to as CM765 in the updated SFRA. The affected lands comprise of part of the curtilage of a long established dwelling and relates to the associated private amenity space to the rear of the dwelling. The zoning of the lands as Existing Residential reflects the established development/use and will be essential in achieving compact and sustainable urban growth, and in facilitating regeneration and consolidation of the town, as well as the established development/use on these lands. Having regard to the established use of the lands there is no requirement to identify suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement. Thus, the zoning is proposed to be **retained**.

Castleblayney

(n) **CBFRA1** - These lands are not located within the revised Flood Zones and thus, the zoning is proposed to be **retained**.

(o) **CBFRA2** - These lands are not located within the revised Flood Zones and thus, the zoning is proposed to be **retained**.

(p) **CBFRA9** - These lands are not located within the revised Flood Zones and thus, the zoning is proposed to be **retained**.

(q) **CBFRA10** – The affected portion of these lands is proposed to be **rezoned** as Landscape Protection / Conservation.

(r) **CBFRA12** – These lands have been **dezoned**.

Clones

(s) **CSFRA2** – The affected portion of these lands is proposed to be **rezoned** as Landscape Protection / Conservation.

- (t) **CSFRA4** – These lands have been **dezoned**.
- (u) **CSFRA15** - These lands are not located within the revised Flood Zones and thus, the zoning is proposed to be **retained**.
- (v) **CSFRA18** – The affected portion of these lands is proposed to be **dezoned**.

Ballybay

- (w) **BBFRA15** – The affected portion of these lands is proposed to be **rezoned** as Landscape Protection / Conservation.
- (x) **BBFRA23** – These lands have been **rezoned** as Recreation and Amenity which is a water compatible use.

R14(iii) Include a policy where all criteria of the justification test cannot be satisfied, to limit existing development to minor development only as outlined in section 5.28 of the Flood Guidelines and new development to water compatible uses in Flood Zone A and less vulnerable uses in Flood Zone B.

R14(iii) Additional text is proposed to be inserted into Section 15.22.8 within Chapter 15 – Development Management Standards stating that where all criteria of the justification test cannot be satisfied, proposals involving existing development will be limited to minor development only as outlined in section 5.28 of the Flood Risk Management Guidelines, new development in Flood Zone A will be limited to water compatible uses, and new development in Flood Zone B will be limited to water compatible and less vulnerable uses.

R14(iv) Review the land use zoning matrix to and / or include an objective to limit usage in flood risk areas to that appropriate to the level of flood risk.

R14(iv) An objective is proposed to be included within Section 9.1 of Chapter 9 – Strategic Objectives for Settlements to limit usage in flood risk areas to that appropriate to the level of flood risk unless supported by a site specific flood risk assessment and development management justification test as indicated in the box below (new text in red).

Strategic Objectives for the Towns and Villages	
SSO 22	To apply the precautionary principle in relation to development on lands identified as being at risk of flooding and to restrict development to uses that are compatible to the level of flood risk unless supported by a site specific flood risk assessment and development management justification test.

R14(v) Review and amend the flood zone maps to ensure the correct datasets and probability extents have been illustrated.

R14(v) The flood zone maps have been reviewed and amended to ensure the correct datasets and probability extents have been illustrated. This addresses any inconsistencies between the flood risk areas on the land use zoning maps for the towns and villages and the maps included in Appendix A to the SFRA.

R14(vi) Accurately overlay the flood zone maps with the land use zoning maps and village maps.

R14(vi) Maps indicating the flood zone overlayed on the land use zoning maps and village maps have been provided within the Strategic Flood Risk Assessment.

R14(vii) Include a policy at section 15.22.8 of Chapter 15 Development Management Standards to require compliance with section 15.22.8.

R14(vii) A policy is proposed to be included within Section 15.22.8 of Chapter 15 - Development Management Standards requiring compliance with section 15.22.8 as indicated in the box below (strike through is deleted text with new text in red).

Flood Risk Policy	
FRP 1	Proposals for developments shall comply with Section 15.22.8 of the Monaghan County Development Plan 2025-2031.

O7 Include Architectural Conservation Areas as outlined in chapter 6 within the land use zoning maps, and village maps, as relevant, in order to highlight these areas within the spatial context of each settlement that will assist in the delivery of NPO 17 to enhance, integrate and protect the value of built heritage assets.

O7 The Architectural Conservation Areas as outlined in Chapter 6 - Heritage, Conservation and Landscape relate specifically to buildings rather than areas and it is an objective of the development Plan (Policy ACO1) to carry out a comprehensive review of the Architectural Conservation Areas within the County during the lifetime of this Plan. This will involve the need for appropriate surveys and consultation to take place with all stakeholders and the public to establish the appropriate areas to be included within the ACAs. These revised ACAs and their boundaries will then be incorporated within the Development Plan by way of variation.

O8 Amend Objective CFO 24 to include an 18-month timeframe for preparation of the maps identifying public rights of way and incorporation into the Monaghan County Development Plan 2025-2031 by way of variation.

O8 Given the complexity of the matter relating to identifying public rights of way within the County, it will be difficult to achieve an objective of listing and mapping all public rights of way within the County during the first 18 months of the development plan. Furthermore, there is a significant number of objectives that are required to be achieved within the first two years of the development plan. Therefore, it is proposed to amend the policy as indicated in the box below (strike through is deleted text with new text in red).

Public Rights of Way Policy	
CFO 24	To identify and preserve existing public rights of way to recreational areas and to commence the process of mapping and listing public rights of way in the County over within the lifetime first four years of this development plan, as resources allow, under the provisions of Section 14 of the Act 2000 (as amended).

R15(i) Include the proposed mitigation measures for Objectives SSO 12 and URO 5 set out in the NIR, in the County Development Plan to accurately reflect the conclusions of the NIR.

R15(i) The proposed mitigation measures for Objectives SSO 12 and URO 5 contained within Section 9.1 and Section 9.35 in Chapter 9 – Strategic Objectives for Settlements as set out in the Natura Impact Report, in the County Development Plan to accurately reflect the conclusions of the NIR as indicated in the box below (new text in red).

Strategic Objectives for the Towns and Villages	
SSO 12	To appropriately designate development envelopes around the towns and Tier 4 villages in order to manage development in a sustainable manner and restrict urban sprawl and the merging of distinctive areas.
Urban Regeneration Objectives	
URO 5	To support the preparation and implementation of Town Centre First Plans in accordance with the Town Centre First Policy which promotes sustainable development and positive environmental benefits.

R15(ii) Produce a stage 1 appropriate assessment screening determination.

R15(ii) A stage 1 appropriate assessment screening determination has been produced.

O9(i) Include in the monitoring strategy for the implementation of the County Development Plan:

a) compact growth: measurable targets and timelines against which the implementation of the core strategy compact growth targets can be measured and monitored

b) regeneration: a clear timeline and strategic approach to carry out the Active Land Management Strategy (URO 4) and set measurable targets (perhaps by settlement for Tiers 1 – 4) and timelines against which the implementation can be monitored and measured

c) rural housing and regeneration: clear targets and provisions for monitoring of the development of housing in rural settlements, the open countryside and the areas of under strong urban influence, and Ballybay

d) sustainable transport: an effective monitoring regime for the implementation of the sustainable transport objectives and policies and modal share targets in particular.

O9(i) The monitoring strategy for the implementation of the County Development Plan is proposed to include the following:-

a) In respect of measurable targets and timelines against which the implementation of the Core Strategy compact growth targets can be measured and monitored, it is proposed to set out specific targets that are measurable, achievable and relevant to what is being measured and monitored. These targets will also be time bound.

For example, in terms of measuring the growth of Monaghan Town in line with the National Planning Framework (NPF) target of 30% growth from the 2016 Census population of the town by 2040 to achieve a population of at least 10,000, bench marking is proposed which will establish targets every two years for the town to grow by the requisite population figure, to ensure it remains on course to achieve the specified population growth. To ensure this target is met Monaghan Town must achieve a population in the region of 9,200 by the end of this development plan period. However, it is considered that to achieve a suitable critical mass for this key town, a population target of 9,700 persons by 2031 should be strived for. To this end a new strategic objective to grow the population of Monaghan Town by a minimum of 100 persons per annum is proposed to be included within the development plan as set out in red text in the box below. Thus, assuming the town has a population of 8,550 in 2025, it should have a population of 8,744 by 2027, 8,938 by 2029, and 9,132 by 2031 to achieve the NPF target growth of 30% and minimum population of 10,000 by 2040. The monitoring of the achievement of these targets will determine whether or not any interventions, changes in policy framework, or changes to policy implementation are necessary.

Monaghan Town Settlement Plan Strategic Objectives

MTSO 2	<p>To ensure that the following priorities for the town are delivered within the lifetime of the development plan:-</p> <ul style="list-style-type: none"> • the implementation of the Dublin Street South Regeneration Plan, Dublin Street North Regeneration Plan, and Roosky Lands Master Plan • the preparation and implementation of a Master Plan for the Saint Louis Convent lands • the development of the Industry, Enterprise and Employment lands at Annahagh and Tullyherim • the implementation of the Town Centre First Plan for the town • the preparation and implementation of a Local Transport Plan for the town • the preparation of a feasibility study in respect of proposed road links within the town • the implementation of the Monaghan Drainage Area Plan • an annual increase in population by a minimum of 100 persons per annum in order to achieve the growth targets set out for the town within both the National Planning Framework and the Regional Spatial and Economic Strategy for the Northern and Western Region.
---------------	---

Measuring the delivery of compact growth across the County will require the collation of data on an annual basis on the number of residential units and other development types applied for, permitted and completed within the built up areas (Tiers 1 – 3 settlements) as defined by the Central Statistics Office (CSO), those applied for, permitted and completed outside the built up areas but within the settlement envelopes, and those applied for, permitted and completed outside the settlement envelopes. This information will inform an Annual Development Plan Monitoring Report as detailed in Chapter 16 – Implementation and Monitoring, providing a focus on development patterns occurring under the settlement strategy of the development plan and the tracking of the nature of new development that is occurring.

Bench marking is proposed which will establish targets every two years for the delivery of the majority of new residential units within the built up areas (Tiers 1 – 3 settlements) to assist in achieving the NPF target of delivering at least 40% of all new homes nationally, within the built-up footprint of existing settlements. The monitoring of the achievement of these targets will determine whether or not any interventions, changes in policy framework, or changes to policy implementation are necessary.

b) In respect of clear timelines and a strategic approach to carrying out the Active Land Management Strategy detailed in the amended Objective URO 4 in the box below (strike through is deleted text with new text in red) it is proposed to set measurable targets for the Tiers 1 – 4 settlements which are time bound against which their implementation can be monitored and measured. This will involve input and actions by the Town Regeneration Office and will incorporate the collation of data on an annual basis on the number of residential units and other development types applied for, permitted, or completed on brownfield / regeneration sites within the Tier 1 to 4 settlements. The strategic approach will involve applying a range of actions from providing advice and assistance in the reuse and rehabilitation of existing properties to the serving of Derelict Sites Notices and the compulsory purchase of properties where appropriate. It will also involve proactive measures such as the adoption and implementation of regeneration plans in the urban areas (Tier 1 – 3 settlements) and the adoption and implementation of village plans (Tier 4 settlements) which will have a focus on the sustainable reuse and regeneration of existing derelict, vacant, or underutilised sites. Targets such as the reduction of the percentage dereliction / vacancy of properties and the reuse of brownfield site in the built up areas of the Tier 1 to 4 settlements by a certain amount annually are also proposed to be established. The monitoring of the success of this strategic approach to reduce dereliction and vacancy will

determine whether or not any interventions, changes in policy framework, or changes to policy implementation are necessary.

Urban Regeneration Objectives	
URO 4	To implement an Active Land Management Strategy in relation to vacant land in the Tier 1 - 4 settlements within County Monaghan and to maintain and update as required a Vacant Sites Register in conjunction with the Town Regeneration Office to ensure efficient and sustainable use of the County's land resources in accordance with the provisions of the Urban Regeneration and Housing Act 2015.

c) In respect of clear targets and provisions for monitoring of the development of housing in rural settlements, the open countryside and the areas of under strong urban influence, and Ballybay it is proposed to set specific, measurable achievable and relevant targets which are time bound against which the implementation can be monitored and measured. Bench marking is proposed which will establish targets every two years for the management of rural housing. This will incorporate the collation of data on an annual basis on the number of residential units permitted in the rural settlements (Tiers 5 and 6 settlements), the rural areas under strong urban influence (both on greenfield and brownfield sites) and the remaining rural area (both on greenfield and brownfield sites). The monitoring of the achievement of these targets will determine whether or not any interventions, changes in policy framework, or changes to policy implementation are necessary.

d) In respect of establishing an effective monitoring regime for the implementation of the sustainable transport objectives and policies and modal share targets in particular, it is proposed to set specific, measurable, achievable and relevant targets which are time bound against which the implementation can be monitored and measured. Bench marking is proposed which will establish targets and specific timescales for delivery. These will be established following the preparation of the Integrated Transport Plan for the County (ITP), the Local Transport Plans (LTPs) for Monaghan Town and Carrickmacross and the Sustainable Urban Mobility Plans (SUMP) for Castleblayney, Clones and Ballybay. The monitoring of the achievement of the targets once established will determine whether or not any interventions, changes in policy framework, or changes to policy implementation are necessary.

To encompass the above and the implementation of the development plan objectives in general, a 'measure, monitor and act' programme will be put in place with appropriate resources upon adoption of the development plan which takes account of the recently published Office of the Planning Regulator Paper 'Development Plan Monitoring Measuring What Matters' (November 2024) and other best practice in this regard. This ongoing programme of monitoring will measure the outcomes of the Plan against its stated objectives utilising key datasets and indicators and will inform the 'Annual Development Plan Monitoring Report'.

O9(ii) Remove 'subject to available resources' or 'as resources allow' from the following Objectives and Policies: GIO 1, GIO 2, ACO 1, TP 1, ATP 10, REO 2, VIO 4, MTO 9, CMO 6, CBO 5, CLO 7, CFO 24.

O9(ii) The wording 'subject to available resources' or 'as resources allow' is proposed to be removed from the following Objectives and Policies: GIO 1, GIO 2, ACO 1, TP 1, ATP 10, REO 2, VIO 4, MTO 9, CMO 6, CBO 5, CLO 7, CFO 24 as indicated in the box below (strike through is deleted text with new text in red).

Green Infrastructure Objectives

GIO 1	To prepare a Green Infrastructure Strategy for the County which considers ecology, climate change mitigation and adaptation, environmental protection considerations, increased climate resilience, and a wide range of ecosystem services, while also enhancing biodiversity, during the lifetime of this plan, subject to available resources.
GIO 2	To prepare a detailed Green Infrastructure Network for the towns of Monaghan, Carrickmacross, Castleblayney, Ballybay and Clones, during the lifetime of this plan, - subject to available resources.

Architectural Conservation Areas Objectives

ACO 1	To carry out a comprehensive review of the Architectural Conservation Areas within the County during the lifetime of this Plan, subject to available resources.
--------------	--

Transport Policies

TP 1	To develop an Integrated Transport Plan for County Monaghan to provide a roadmap identifying strategic transport routes that will aim to connect towns, communities and rural areas. The plan will be prepared in collaboration with NTA, TII, DOT and local and national public transport providers, during the lifetime of this plan, subject to available resources. commencing by 2027.
-------------	---

Active Travel and Recreational Walking and Cycling Policies

ATP 10	To prepare Sustainable Mobility Plans for Ballybay, Castleblayney and Clones, during the lifetime of this plan, subject to available resources.
---------------	--

Renewable Energy Objectives

REO 2	To prepare a Renewable Energy Strategy for the County over the lifetime of this plan and subject to the availability of resources within one year of the publication of the Methodology for Local Authority Renewable Energy Strategies or the Regional Renewable Electricity Strategy for the Northern and Western Region, whichever is the sooner. Such a Strategy shall be shaped and informed by environmental considerations, constraints and sensitivities relevant to the Plan Area - including biodiversity, European sites, and landscape and visual amenity related designations.
--------------	---

Tier 4 Villages Objectives

VIO 4	To prepare plans for the Tier 4 villages plans during the lifetime of this plan, which with a focus on housing, amenity, infrastructure, parking provision and traffic calming transport during the lifetime of this plan, subject to available resources. and the sustainable reuse and regeneration of existing derelict, vacant, or underutilised sites. At least one village plan will be prepared for a village in each of the three Municipal Districts per annum.
--------------	--

Monaghan Roads and Traffic Management Objectives

MTO 9	To prepare a Local Transport Plan for Monaghan Town using the Area Based Transport Assessment process, during the lifetime of this plan, subject to available resources by 2025.
--------------	---

Carrickmacross Roads and Traffic Management Objectives

CMO 6	To prepare a Local Transport Plan for Carrickmacross Town using the Area Based Transport Assessment process, during the lifetime of this plan, subject to available resources commencing by 2026.
--------------	--

Castleblayney Roads and Traffic Management Objectives	
CBO 5	To prepare a Sustainable Urban Mobility Plan for Castleblayney Town using the Area Based Transport Assessment process , during the lifetime of this plan , subject to available resources commencing by 2026.
Clones Roads and Traffic Management Objectives	
CLO 7	To prepare a Sustainable Urban Mobility Plan for Clones Town using the Area Based Transport Assessment process , during the lifetime of this plan , subject to available resources completed by 2025.
Ballybay Roads and Traffic Management Objectives	
BBO 7	To prepare a Sustainable Urban Mobility Plan for Ballybay Town using the Area Based Transport Assessment process , during the lifetime of this plan , subject to available resources commencing by 2026.
Public Rights of Way Policy	
CFO 24	To identify and preserve existing public rights of way to recreational areas and to commence the process of mapping and listing public rights of way in the County over within the lifetime first four years of this development plan, as resources allow , under the provisions of Section 14 of the Act 2000 (as amended).

O10 Address discrepancies between residential and employment land identified on the zoning maps and sites identified in the Infrastructure Assessment and Settlement Capacity Audit.

O10 In accordance with the Development Plan Guidelines the Infrastructure Assessment (IA) and Settlement Capacity Audit (SCA) were carried out having regard to the lands currently zoned within the Development Plan under review. Both the IA and SCA have been reviewed and updated to take account of lands proposed to be zoned that are not zoned in the current Development Plan. This will resolve any discrepancies between residential and employment land identified on the zoning maps and sites identified in the Infrastructure Assessment and Settlement Capacity Audit.

Chief Executive Recommendation

In accordance with Section 12(5)(aa) of the Planning and Development Act 2000 (as amended) where a planning authority decides not to comply with any recommendation made in the report in response to the submission by the Office of the Planning Regulator it shall so inform the Office of the Planning Regulator and the Minister as soon as practicable by notice in writing containing the reasons for the decision.

The responses above to the recommendations and observations made by the Office of the Planning Regulator, in the main, comply with the recommendations and observations, in so far as it is appropriate for the circumstances of the County, having regard to legislative and Government policy requirements. Where recommendations have not been fully complied with, the responses above seek to justify the position taken based on relevant considerations specific to County Monaghan.

Consequently, it is recommended that the elected members amend the draft County Development Plan 2025-2031 to incorporate the proposed changes in the responses set out above.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-6</u>	Northern & Western Regional Assembly (NWRA)	N/A	N/A

Summary of Submission & Issues Raised

- The NWRA is required under Section 27B. of the Planning and Development Act 2000, as amended, to offer its opinion on whether or not the draft is consistent with the Regional Spatial and Economic Strategy ('RSES') and its objectives and to make recommendations on any amendments necessary to ensure the draft Plan is consistent with the RSES.
- This submission of the NWRA is primarily focused on the consistency overall of the plan in respect of the Regional Strategy, comment will not be made on the detail for Tier 2 towns and below within the settlement hierarchy.
- The draft Plan is a generally well-constructed series of documents, and it is very clear in its presentation, with a comprehensive set of policies and objectives and the overall ambitions for County Monaghan over the next plan period.
- The NWRA made a detailed submission to the *Pre- Draft Stage Issues Paper* in July 2023.

Chapters 1, 2 & 3 – Introduction, Core Strategy and Housing Strategy

The Draft Plan refers to the Local Economic and Community Plan (LECP) for the period 2023-2029 which shares the same vision as the Draft Plan to provide an overall strategy for the social, economic, cultural and physical development of the County. Reference is made to the 'Challenges for County Monaghan'. Identifying the Strategic Aim of the Plan, the 10 Strategic Objectives, the County Profile and the current census figures. Including the cross-border dynamics to Monaghan's settlements and its proximity to Northern Ireland and membership of the Irish Central Border Area Network (ICBAN). The Core Strategy Section is informed by the HNDAs process, and the submission references projected population figures.

Monaghan Town: There is a pronounced lack of private investment in housing projects in many towns in the Region, and this is not exclusive to Monaghan Town. The *RSES 2-year Implementation Report (2020 – 2021)* illustrates this to be the case across all of the designated Centres for growth (Key Towns, Regional Growth Centre's & the Galway MASP), and the forthcoming RSES 2 Year Implementation Report (2022 – 2023) again will illustrate housing completions continue to be well below the targets set out in Section 3 of the RSES.

This Draft Plan attempts to locate populations and development into a hierarchy of serviced towns and villages, with a focus on regeneration. The RSES has set important ambitions for the growth of Key Towns and Regional Growth Centres. The extent of this ambition is based upon the recognition in the NPF that the Northern and Western Region suffers from an historically weak urban structure, and an ongoing lack of Centre's of real scale outside of Galway City. The RSES include objectives (including RPOs 3.1 - 3.4) placing an emphasis on accelerating the development of centres such as Monaghan Town to serve as wider economic and social drivers for significant Sub Regions / Counties. This strategy remains a regional priority, and via the ongoing NPF Review in Q. 3 of 2024, the Assembly has again advocated numerous mechanisms to aid its achievement.

It is projected in the Draft Plan that Monaghan Town will grow by an additional 1,303 persons up to 2031, as per the Core Strategy. The NPF (NPO 9) and RSES (RPO 3.1) reflects an ambition where significant rates of population growth of at least 30% above Census 2016 population levels are envisaged. The CSO 2016 population for Monaghan Town was 7,678, and the target for the 2040 population for the town is at least 10,000 persons as per NPO 9 (30% growth rate), The 2022 population figure for Monaghan town was 7,894, an increase of 216 persons in 6 years. This rate of

growth represents a relatively low 3% over 6 years. It is unclear within the Plan how the current trend of moderate growth can be substantially increased to realise the ambitions of the Regional Strategy, and this is a matter which could benefit from additional focus and expanded narrative / analysis within the Plan. Albeit, as outlined above, the Assembly acknowledge this is a national challenge and appears particularly acute in this Region. The Plan states that Monaghan Town should achieve a population of at least 10,000 by 2040. To ensure this target is met, Monaghan must achieve a population level of 9,200 at the end of this CDP Period (2031). This ambition appears to be consistent with that outlined within Chapter 3 of the RSES.

In conclusion, it appears the Core Strategy for the County is aiming to achieve the minimum growth target for Monaghan Town. A growth rate of at least 30% for Monaghan Town should be the very least of the Local Authority's ambition within this plan, and such a target would fit with Monaghan's Key Town role in the region, particularly in light of recent and ongoing investment in the town in the areas of place making, and public realm.

The Core Strategy includes consideration of the economic function of the settlements and reference is made to Chapter 4 Economic Development and Chapter 7 Infrastructure, as linkages exist between the economic development and delivery of critical infrastructure.

In relation to Rural Housing, RSO 2 reflects the spirit of RSES RPO 3.3 which seeks to 'deliver at least 20% of all new housing in rural areas on brownfield sites'. This policy mechanism is welcomed by the NWRA.

The Rural Housing Policy is generally aligned with NPO 19 of the NPF which refers to 'rural areas under urban influence' and 'rural areas elsewhere'. It is also cognisant of the Sustainable Rural Housing Guidelines, 2005, with categorisation of areas as Category 1- *Rural Areas Under Strong Urban Influence* and Category 2 - *Remaining Rural Areas*, with rural housing being more restricted under RSP 6 & 7 in Category 1 areas. The Housing Strategy is set out within Chapter 3 of the Plan, with the Housing Supply Targets, clearly apportioned, and explained. In Monaghan over the last decade, there has been a consistent annual undersupply of housing units. This trend is replicated across the Region, and is not unique to the County.

The Housing Strategy Supply Target for County Monaghan, Table 3.2 notes the housing demand for the period 2020-2031 is 3,668 or 306 units per annum. This will require an increase of 65% on the current output.

Chapter 4 – Economic Development

The Economic Development focus within the Plan reflects the central challenge to help create more jobs to ensure that more people who live in the county can gain employment within the County and that the County is not only seen as a place to visit and live in, but a place to invest and work in. Economic Development Strategic Objective EDSO endorses this.

The county's strong work ethic, entrepreneurship, and in particular the importance of the Agri food industry, is underlined at the outset of the chapter. The expansion into less traditional industrial, enterprise and service sectors are also highlighted as a trend in recent years, which can be attributed to Monaghan's Strategic location.

The plan recognises the significance of the rural economy and also the importance of Monaghan's role in the region. The Monaghan Local Economic and Community Plan 2023- 2029 (LECP) goals 3-6 are included as being relevant to the economic development of the county. Ten Economic Development

objectives EDO-1 -10 and four Economic Development Policies EDP 1-4 are included and are broadly consistent with the RSES particularly EDO 8, 9 and 10.

Chapter 5 Community

Community Facilities Strategic Objective CFSO 1 seeks to protect and enhance existing community and recreation facilities throughout the County. The recognition of the Local Community Development Committee (LCDC) and the Local Economic and Community Plan (LECP) and the inclusion of the 6 high level goals ensures this community process is well embedded in this statutory planning framework. The RSES (Chapter 7.5) seeks to promote a multi-agency approach to delivering health, social and community services (See RPO 7.5) and the policy route outlined within the Draft Plan is generally in accordance with the Regional Policy.

Under Educational Facilities, third level educational opportunities are identified as important for Monaghan and CFO 2 – CFO- 4 addresses RSES RPO 7.7. The overall approach in the context of the provision of Third Level education in County Monaghan will require a multi-agency approach, and further work will be needed to advance this aim.

Cycling and Walking

MCC has prepared a Walking and Cycling Strategy for the County and the objectives in the plan support the objectives of the Strategy 2021-2026. The plan supports the development of the Ulster Canal Greenway Network, which represents a project of regional scale and an All-Island venture which would bring cross border benefits to the area and would also match the regional ambition of *'Tourism Projects of scale'*, RPO 4.6 and is also consistent with RPOs 5.18 and 5.19, which support the development of our greenway networks. It also supports RPO 5.20 which seeks to facilitate the development of our Blueways, such as the Ulster Canal.

Arts, Culture and Library services

The plan includes a number of objectives aimed at encouraging and assisting in the development of the arts, cultural infrastructure and library services in the county, which are consistent with chapter 5.6 of the RSES, including RPO 5.10.

Chapter 6 – Heritage, Conservation and Landscape

Regional Policy in respect of Landscape, and heritage conservation is framed without a National LCA (Landscape Character Assessment), nonetheless, there are a number of key principles in the RSES which apply to Local Policy: The relevant Policy Objective RPO 5.2 Protect manage and conserve the quality, character and distinctiveness of our Landscapes and seascapes.

The NWRA supports co-operation and co-ordination between Local Authorities in determining landscape character along their borders. A targeted review should be undertaken to ensure consistency in classification and policy in adjoining areas of similar character. The NWRA will assist in collaboration and coordination.

Following the completion of the National LCA, and any associated statutory Guidelines, the NWRA shall prepare a Regional LCA to promote improved landscape management and designation. In respect of LCA, it is noted MCC commissioned the preparation of a LCA of the County in 2008. This study was carried out in accordance with the Department of the Environment, Community and Local Government Guidelines. This LCA would benefit from being updated albeit in the absence a National LCA, and any associated statutory Guidelines. While there is no direct undertaking in the Draft CDP, to carry out a LCA, HCLO 6 – references *the 2008 LCA and any new or updated versions*. The plan provisions in respect of Biodiversity, protection of Natura 2000 sites and control of invasive species is generally consistent with the RSES Overarching Environmental Regional Policy Objectives. Similarly,

the plan provisions in respect of Architectural and Archaeological Heritage are consistent with the RPOs in Chapter 5.7 of the RSES.

Chapter 7 Transport and Infrastructure

This Chapter of the draft Plan focuses on 'Transport' and the key priorities for County Monaghan, including National Road Projects, detailing the TENT network, Project Ireland 2040, the Counties aims in respect of Climate Action measures, Sustainability Mobility and Active Travel, Vision Zero Road Safety and Transport Planning and Design Principles. Chapter 7 outlines strong objectives and policies for the County.

It includes the National Climate Action Plan 2023/2024 Work Programmes, Proposed National Cycle Network in Monaghan, 2023, Proposed Cycle Connects network in County Monaghan as well as the Preferred Route Corridor for the N2 Clontibret to Border Scheme (February 2021), the N2 Upgrade is a key Transport priority of the RSES, (See RPO 6.7).

The draft Plan also identifies other 'Key Transport Corridors' which are of regional significance. With regard to 'Telecommunications and Broadband Connectivity' RPO 6.36, 6.37 and 6.39 are supported by the Telecommunications Objectives of the draft Plan TCO-1, TCO-2 & TCO-3.

Policy TP 2 Undertakes to prepare 'Local Transport Plans' using the 'Area Based Transport Assessments' process in Monaghan Town and Carrickmacross, and 'Sustainable Urban Mobility Plans' for the towns of Castleblayney, Clones and Ballybay during the lifetime of this plan, subject to funding and available resources, which reflects the requirements of RPO 6.27- RPO 6.34 Enabling Plans – Local Transport Plans (LTP). Timeframes for same would be welcome. It would be preferable for the LTPs to be conducted in conjunction with the land use plans for the main towns within County Monaghan. A more specific timeline for the preparation of same should be elaborated upon in the CDP.

In relation to the potential return of 'Rail' to Monaghan, the draft Plan does not acknowledge the 'All-Island Strategic Rail Review' (AISRR) nor does it identify the potential therein for a new strategic rail connections where Monaghan would have a strategic role, i.e. a midlands North link between Portadown and Mullingar via Armagh, Monaghan, Clones, and Cavan (This is included in the final package for regional and rural recommendations), and a potential Sligo to Belfast link via Enniskillen and onwards to Portadown and Belfast via either Clones or Omagh.

The recommendations within the 'All-Island Strategic Rail Review' are significant for the Border Region, and County Monaghan represents a key network node within the report. Therefore, the NWRA would consider that the implication of the key recommendations of the 'All-Island Strategic Rail Review' should be considered.

Chapter 8 Environment, Energy and Climate Change

The Energy Section of the plan is brief, running to 5 pages. The Objective REO 2 proposes to prepare a Renewable Energy Strategy (RES) for the County over the lifetime of the plan. The preparation of an RES for Monaghan should be a priority, albeit the NWRA accept that a timeline for its delivery is somewhat influenced by the advancement of the Regional Renewable Electricity Strategy, as part of the review of the RSES as envisaged in the Draft NPF. The Plan should make provision for the plan to incorporate policy measures that are consistent with the RSES, RPO 4.16 – 4.21 Renewable Energy and Low Carbon Future and it should align with the RPO 4.27, 4.28 & 4.29, Agri-food and Bioeconomy.

The Council's Climate Action Plan 2024-2029 is embedded in the draft Plan within Section 8.4 and complies with RPO 5.1 of the RSES. Section 8.7 of the draft Plan addresses Flood Risk Management.

MCC should continue to work with OPW and stakeholders to ensure compliance with RPO 3.11 and RPO 8.13.

Chapter 10 Monaghan Town Settlement Plan 2025-2031

The settlement plan is aligned with the Core Strategy Table and is broadly acceptable, albeit only seeking to achieve the minimum target population uplift provided within the RSES. The figures (ha.) for zoning allocations are not visible and these need to be made available to enable an assessment as to whether the allocation is appropriate/adequate. Further detailed comment is outlined above on the Core Strategy, with Monaghan Town the focus of analysis on its consistency with Regional Policy.

Chapter 11. Carrickmacross Town Settlement Plan 2025-2031

The settlement plan is aligned with the Core Strategy Table and is broadly acceptable. The figures (ha.) for zoning allocations are not visible and these need to be made available to enable an assessment as to whether the allocation is appropriate / adequate. The plan should have regard to Carrickmacross's role as Place of Regional Potential with regard to Enterprise & Employment Infrastructure, as per 3.9 of the RSES and address this appropriately in the Town plan.

Chapter 16 Implementation and Monitoring

The draft Plan includes provisions for; Core Strategy monitoring and Plan Objective Monitoring and states that where necessary to pursue the implementation of the Strategic Objectives of the Plan, the preparation of further action plans or projects will be pursued.

The Plan would benefit from a more detailed 'Monitoring and Review Mechanism' to enable ongoing measurement of Policies/Goals therein. This should include quantifiable indicators where progress/performance can be evaluated. Such an approach has become increasingly common across County Development Plans, and Local Area Plans in recent years.

Other Considerations

The draft Plan, whilst comprehensive in most areas, is lacking in timelines, which are generally absent in terms of projects, and priority areas of work. Correspondingly, the draft Plan does not contain any mechanism for monitoring, or reviewing the progress / performance of the Plan, or elements of the Plan, which includes the fundamental matters of Housing, and Housing Delivery. The NWRA would strongly recommend this element of the Policy is remedied.

In relation to 'Serviced Sites' these are factored into the Core Strategy section and are included in Rural Housing and Housing Strategy Objectives and Development Managements Standards, for the various Tiers 1-6. However, a specific objective proportioning a greater share of housing in towns and villages, including revisiting serviced sites initiatives, and through the objectives of Croi Conaithe, would be beneficial.

Finally, there is no reference within the draft Plan relating to SMART regions/SMART technology with public services/interface across County Monaghan. Section 6.6 of the RSES is instructive in this regard, particularly with the Backdrop of Budget 2024 including the addition of a Smart Regions Fund.

Key recommendations from the NWRA

1. The Core Strategy of the Plan would benefit from modification to include an analysis (commentary) of the recent (Census. 2016 – 2022) modest population increase for Monaghan Town and provide an elaboration of any potential/proposed measures to realise the growth ambitions now outlined for the period 2022 – 2031.
2. The Objective REO 2 proposes to prepare a Renewable Energy Strategy (RES) for the county over the lifetime of the plan. This Policy could be enhanced with the inclusion of a

commitment to produce a RES within a defined timeframe following the adoption of the Regional Renewable Electricity Strategy which will form part of the review / renewal of the RSES.

3. The Plan should demonstrate consistency with the RSES, RPO 4.16 – 4.21 Renewable Energy and Low Carbon Future, as appropriate and likewise the draft Plan should align with the RPO 4.27, 4.28 & 4.29, Agri-food and Bioeconomy.
4. The Plan should be amended to include a comprehensive Monitoring and Review & Implementation Mechanism to enable an ongoing measurement of Policies / Goals therein. This should include quantifiable indicators where progress / performance can be evaluated, and Plan Policy modified if required.
5. The plan should include an objective which references the Serviced Sites initiatives, and give effect to RPO 3.7
6. The draft Plan should consider the All-Island Strategic Rail Review and its relevance to Monaghan and the wider Border and Northwest Region. It should incorporate some reference which reflects the recommendations of this Review, and its potential benefits in the Medium / Longer Term as they relate to County Monaghan and its role as a potential critical node within the Network.
7. The Town plan for Carrickmacross, should have regard to Carrickmacross's role as a *Place of Regional Potential* with regard to Enterprise & Employment Infrastructure, as per Section 3.9 of the RSES and address this appropriately in the Town plan. Further this Regional Potential should be underlined in Core Strategy and / or the Economic Development chapter, with a view to a wider collaboration within Cavan County Council in this regard.

Observations

1. Chapter 7 of the Plan be revised to include and highlight the compilation of a concise list of Critically Enabling Projects, which the Council see as key to the future advancement of the County within the Lifetime of this Plan, and possibly beyond this time period.
2. Chapter 7 be amended such that Tables relating to Roads and Greenways are allocated a status to each project, and an estimate on timelines. It is suggested where a precise timeline cannot be provided then a Scheme could be classified as deliverable in either the Short / Medium / Long Term.
3. The Plan would benefit from a review and update of the 2008 Landscape Character Assessment for County Monaghan.
4. The Plan (Chapter 8) would be enhanced if it is revised to incorporate Regional and National Policy ambitions in respect of the Bio-Economy, having regard to the National Statement and RPOs 4.27, 4.28 & 4.29.
5. The Plan would benefit from a review in the Context of SMART Regions / SMART Towns, to reflect Sec. 6.4 of the RSES.

Conclusion

In an overall context the Draft Monaghan County Development Plan 2025 – 2031 displays a strong degree of policy alignment with the RSES. Whilst this Draft Plan has been published at a time of significant policy updates, including the updated Planning & Development Bill, as well as the ongoing revision of the National Planning Framework, the Plan generally reflects regional priorities to a significant extent.

The areas set out above under observations/recommendations would further reinforce the delivery of regional ambitions across County Monaghan.

Chief Executive Response

The seven recommendations, and five observations put forward by the NWRA are acknowledged. It is recognised that National Policy is evolving the Draft Plan has been aligned were reasonably possible. Each of the recommendations and observations are considered below.

- 1) Based on the key recommendations, a further explanation should be added to demonstrate the key population changes between 2016 and 2022 census and as Monaghan is designated as a Key Town further elaboration regarding how MCC intend to grow this Town shall be emphasised, this will include a focus on compact growth, town regeneration schemes and the application of the Derelict Sites Act.
- 2) The Renewable Energy Strategy Objective REO 2 should be amended to be more concise and provide a realistic timeframe for delivery.
- 3) The bio economy is an emerging sector which represents a significant opportunity to harness renewable biological resources from land and sea and produce food, feed and bio-based materials and energy. As such Chapter 8 should be amended to reflect RPO 4.27, 4.28 and 4.29, in conjunction with RPO 4.16 – 4.21 Renewable Energy and Low Carbon Future.
- 4) In respect of Monitoring/Review and the implementation mechanism to enable an ongoing measurement of Policies/Goals therein. The SMART mechanism (smart, measurable, achievable, relevant and time bound) has been applied. Every effort has been made to formulate policies and objectives in the Plan that are SMART. The indicators as included in chapter 16 are measurable based on obtaining statistics from development management and CSO data both of which can be mapped and subsequently analysed on a 2-year basis at detailed in this chapter. It should be noted that some of the plan policies within this report are recommended to include specific timeframes for delivery, ensuring that the progress of these can be evaluated against performance. However, it is acknowledged that not all policies and objectives may be measured in easily identifiable quantitative values. The intention of many of the policies included in the Plan are wide ranging and many polices are intended to facilitate and support a chosen outcome, rather than act as a direct means of delivering the outcome.
- 5) It is felt that a further objective should be added in Chapter 3 Housing Strategy, which will encourage the implementation of initiatives surrounding the activation of Service Sites in smaller towns and villages in conjunction with RPO 3.7 which states, ‘the Assembly supports local authorities in identifying and prioritising a program for the provision of serviced sites within smaller towns and villages within 1 year of the adoption of the RSES. A rolling 2-year implementation plan shall subsequently be prepared’.
- 6) The Council has placed an emphasis on the protection of the established and historic railway corridors throughout the County as identified in objective CFO 20. Existing objective TO1 already allows for the delivery of the recommendations of the report. The NWRA’s submission references ‘a potential Sligo to Belfast link via Enniskillen and onwards to Portadown and Belfast via either Clones or Omagh’, however the All-Island Strategic Rail Review (AASRR) notes that while this route was assessed along with others, ‘The relatively low level of anticipated demand suggests that rail is not the appropriate solution to improve connectivity along many of the routes assessed’. This route does not feature in the recommendations of the report. No amendment to the draft CDP is proposed in response to this comment, however, the All-island Strategic Rail Review Report was not referenced in the Draft CDP and is an important report which should be included in the text in Chapter 7.
- 7) It is acknowledged that Carrickmacross/Virginia perform important sub regional functions for employment, housing and services with Carrickmacross a hub for south Monaghan. It is a main economic driver for wider highly populated catchments. The town is strongly positioned to attract business and inward investment, as such its ‘place of Strategic potential’ should be acknowledged within the draft CDP and an amendment to the plan is required.

Observations

- 1) The submission requests that Chapter 7 of the Plan be revised to include and highlight the compilation of a concise list of Critically Enabling Projects, which the Council see as key to the future advancement of the County within the Lifetime of this Plan, and possibly beyond this time period. MCC has a number of projects proposed, of which are considered necessary to deliver the objectives of the CDP. All projects proposed are subject to funding and approval. MCC has no control over funding and has limited influence on timeframes. It is considered that listing 'critically enabling projects' could undermine the delivery of non-critical projects. For this reason, no amendment to the draft CDP is proposed.
- 2) The submission requests that Chapter 7 be amended such that Tables relating to Roads and Greenways are allocated a status to each project, and an estimate on timelines. It is suggested where a precise timeline cannot be provided then a Scheme could be classified as deliverable in either the Short/Medium/Long Term. The CDP will be in place for 6 years, and it is not considered appropriate to assign a status in the year of publication. It is also not considered appropriate to state whether projects are short/medium/long-term, as the pace of delivery is dependent of funding and approvals, which are outside of the control of the Local Authority. Furthermore, some projects may be delivered on a phased basis, which could see early phases delivered in the short-term, and subsequent phases delayed until the long-term. For this reason, no amendment to the draft CDP is proposed.
- 3) The Landscape Character Assessment was completed some time ago and a further objective should be added to have a more updated LCA which will be undertaken in conjunction with a Renewable Energy Strategy.
- 4) See amendments suggested reflecting recommendation 3.
- 5) SMART is referred to within the Transportation Chapter and Climate Action chapter, stating Strategic Goal 2 of the County's Climate Action Plan. No amendment recommended.

Chief Executive Recommendations

The following changes are recommended.

1. At Chapter 2 Core strategy, Section 2.5 Economic Development Strategy, add the following text in red as follows:
In accordance with NPO 9 of the NPF, Monaghan Town is designated as a key town within the RSES and therefore is identified in the RSES for significant rates of population growth of 30% or more above Census 2016 population levels **which was 7,678**. This means that Monaghan Town should achieve a population of at least 10,000 by 2040. To ensure this target is met Monaghan Town must achieve a population of 9,200 by the end of this development plan period. **It is acknowledged that the 2022 population figure for Monaghan town was 7,894, an increase of 216 persons in 6 years. To increase this growth rate a revised focus will be placed on driving compact growth, inward investment, town regeneration schemes such as Dublin Street North, Dublin Street South Regeneration Plans and Roosky Lands Master Plan along with the application of the Derelict Sites Act. An additional objective MTSO 2 has been included in Chapter 10 Monaghan Town to support this focus.** Monaghan is the primary economic growth town to be promoted for regional enterprise where critical mass is a core objective to justify strategic infrastructure provision. Thus, Monaghan Town is designated as a Tier 1 settlement.

At Chapter 10, Monaghan Town Settlement Plan, it is recommended that the following objective is added to Chapter 10.

Monaghan Town Settlement Plan Strategic Objectives	
MTSO 2	To ensure that the following priorities for the town are delivered within the lifetime of the development plan:- <ul style="list-style-type: none">• the implementation of the Dublin Street South Regeneration Plan, Dublin Street

	<p>North Regeneration Plan, and Roosky Lands Master Plan</p> <ul style="list-style-type: none"> • the preparation and implementation of a Master Plan for the Saint Louis Convent lands • the development of the Industry, Enterprise and Employment lands at Annahagh and Tullyherim • the implementation of the Town Centre First Plan for the town • the preparation and implementation of a Local Transport Plan for the town • the preparation of a feasibility study in respect of proposed road links within the town • the implementation of the Monaghan Drainage Area Plan <p>an annual increase in population by a minimum of 100 persons per annum in order to achieve the growth targets set out for the town within both the National Planning Framework and the Regional Spatial and Economic Strategy for the Northern and Western Region.</p>
--	--

2. At Chapter 8 Environment Energy and Climate Change, Section 8.2.11 titled Passive Housing, within this section at objective REO 2 add the red text as follows with the deletions in black with a strike through.

Renewable Energy Objective	
REO 2	<p>To prepare a Renewable Energy Strategy for the County over the lifetime of this plan and subject to the availability of resources <i>within one year of the publication and adoption of the publication of the Methodology for Local Authority Renewable Energy Strategies or the Regional Renewable Electricity Capacity Allocations for the Northern and Western Region, whichever is sooner.</i> Such a Strategy shall be shaped and informed by environmental considerations, constraints and sensitivities relevant to the Plan Area-including biodiversity, European sites, and landscape and visual amenity related designations.</p>

3. At Chapter 8 Environment, Energy and Climate Change, Section 8.2.7, it is recommended to update targets/legislation/strategies and include National Policy Objective 53 which will read as follows.

Energy efficiency helps to reduce overall energy consumption and is therefore central to achieving the EU’s climate ambition, while enhancing present and future energy security and affordability. The ‘Energy Efficiency Directive’ (EED) (EU/2023/1791) *and the guidance issued to Member States which pertains to the revised Renewable Energy Directive (2023/2413/EU), commonly known as RED III,* significantly raises the EU’s ambition on energy efficiency, and it also sets out the exemplary role that the public sector has in contributing to this EU target.

After the following paragraph in Section 8.2.7 Bio Energy, it is recommended that the red text be included.

The Government’s Waste Action Plan for a Circular Economy 2020-2025 was Ireland's first roadmap for waste planning and management. This plan sought to shift focus away from waste disposal towards preserving resources by creating a circular economy. The goal is to have a circular economy that reduces carbon impact and protects natural resources, environment and health. *This is supported by National Planning Framework 2040 and its Policy Objective 53 which states to ‘Support the circular and bio economy including in particular through greater efficiency in land management, greater use of renewable resources and by reducing the rate of land use change from urban sprawl and new development’.* Monaghan County Council will continue to have regard to this National Policy Objective and those objectives which support the circular and bioeconomy as set out in the RSES RPOs 4.27, 4.28 and 4.29.

‘There is a commitment from Government to support delivery of up to 5.7TWh of indigenously produced biomethane by 2030. A first key step to delivering on this ambitious target is the publication of the National Biomethane Strategy.

The National Biomethane Strategy (May 2024) sets out the necessary policy and regulatory measures, and provides a roadmap, to developing a biomethane industry of scale in Ireland. The development of the Strategy focused on a framework of five interlinking pillars seen as critical to target delivery:

- sustainability;
- demand for biomethane;
- bioeconomy and the circular economy;
- economics of biomethane; and
- enabling policy requirements’.

In July 2022, DECC published a target of up to 5.7 TWh, (10%) of national gas demand, to come from biomethane by 2030 as part of the Sectoral Emissions Ceilings. The Environmental Protection Agency (EPA) (EPA – Ireland’s Provisional Greenhouse Gas Emissions report) released in July 2023 on Ireland’s provisional 2022 emissions, highlights the urgency to deliver decarbonisation options for Ireland to meet its 2030 targets. Monaghan Council will give due regard to the National Biomethane Strategy in conjunction with any land use planning requests for biomethane facilities.

4. At Chapter 3 Housing Strategy, Section 3.18 Delivering the Housing Strategy, within this section it is recommended to add a further objective as follows:

Housing Strategy Objectives	
HSO 13	To encourage and support the provision of service sites within smaller towns and villages.

*To note the existing objective HSO 12 will be renumbered HSO 13.

5. It is recommended that an additional paragraph with regard to the All-Island Rail Review should be added to Chapter 7 Transport and Infrastructure, Section 7.1.5 of the draft CDP. Which should read as follows:

All-Island Strategic Rail Review

The All-Island Strategic Rail Review Report, which was jointly commissioned by the Department of Transport in Ireland and the Department for Infrastructure in Northern Ireland, sets out a strategic vision for the development of the rail system across the island of Ireland over the coming decades. The Rail Review Report sets out 32 strategic recommendations to enhance the rail system in Ireland and Northern Ireland up to 2050, aligning with net carbon zero commitments in both jurisdictions. The report includes a proposal for a new single-track railway running between Portadown – Armagh – Monaghan – Clones – Cavan – Mullingar.

6. It is recommended at Chapter 4, Economic Development, Section 4.7, the following bullet point and text in red is added.

- To promote Carrickmacross’s role as a ‘Place of Regional Potential’ with regards to Enterprise & Employment Infrastructure, as outlined in the RSES.

At Chapter 11, Carrickmacross, Section 11.6 Industry, Enterprise and Employment, it is recommended to add in the following text in red to objective CMO 5:

Carrickmacross Industry, Enterprise and Employment Objective	
CMO 5	To promote Carrickmacross as the key industrial, enterprise and employment centre in the south of the County and as a place of strategic development potential of a regional scale.

Observations recommendation

1. As suggested indicative timeframes for the LTPs/SMPs should be included in the narrative describing the LTPs and SMPs and as such. An amendment is proposed in the narrative for LTPs and SMPs in Chapter 7 Transport and Infrastructure, Section 7.2 of the draft CDP. It should read as follows:

The Sustainable Mobility Policy notes, ‘local transport plans for the regional growth centres and key towns will allow for local implementation of national and regional level land use and transport policies. These plans will be prepared based on the Area Based Transport Assessment Guidance produced by the NTA and TII.’ ~~The following Local Transport Plans are to be prepared for~~ **proposed for County Monaghan, subject to NTA funding and approval through necessary project approval guidelines and statutory processes;**

1. Monaghan Town (for completion in 2025)
2. Carrickmacross (anticipated to commence in 2026)

In addition, ~~the following Sustainability Mobility Plans (SUMPs) are to be developed for~~ **planned, subject to NTA funding and approval through necessary project approval guidelines and statutory processes:**

1. Clones (for completion in 2025)
2. Castleblayney (anticipated to commence in 2026)
3. Ballybay (expected to commence in 2026, subject to funding and resources)

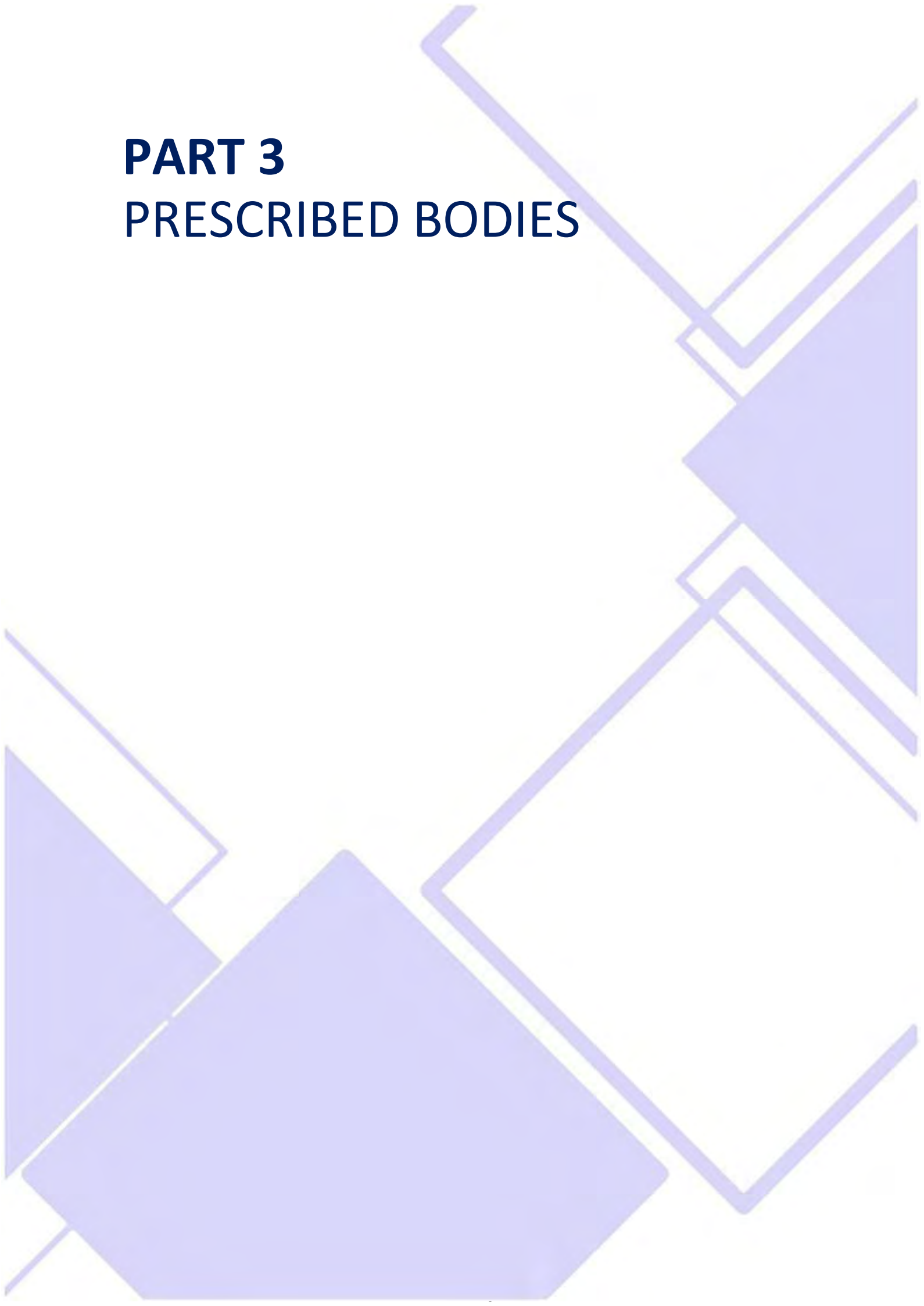
2. At Chapter 6 Heritage, Conservation and Landscape, Section 6.4 titled Landscape Character Assessment, it is recommended that a further objective is added as follows:

Landscape Character Assessment Objective	
LCO 5	To review and update the Landscape Character Assessment in tandem with the preparation of the Renewable Energy Strategy for the County.

*To note the remaining objectives (HCL0) to be renumbered from the existing numbering 5-18 to the proposed numbering of 6-19.

PART 3

PRESCRIBED BODIES



Responses from Prescribed Bodies		
Submission Reference	Name/Organisation	Page No.
<u>MN-C22-MCDP-5</u>	Environmental Protection Agency (EPA)	68
<u>MN-C22-MCDP-22</u>	Department for Infrastructure (NI)	72
<u>MN-C22-MCDP-25</u>	Fermanagh and Omagh District Council	74
<u>MN-C22-MCDP-48</u>	Transport Infrastructure Ireland	77
<u>MN-C22-MCDP-50</u>	Meath County Council	90
<u>MN-C22-MCDP-64</u>	Inland Fisheries Ireland	92
<u>MN-C22-MCDP-71</u>	National Environmental Health Service	95
<u>MN-C22-MCDP-84</u>	Office of Public Works	105
<u>MN-C22-MCDP-93</u>	Department of Agriculture, Environment and Rural Affairs	116
<u>MN-C22-MCDP-94</u>	Department for Communities (Historic Environment Division)	120
<u>MN-C22-MCDP-116</u>	Electricity Supply Board	123
<u>MN-C22-MCDP-121</u>	National Transport Authority (NTA)	128
<u>MN-C22-MCDP-125</u>	Uisce Éireann	133
<u>MN-C22-MCDP-128</u>	The Heritage Council	146
<u>MN-C22-MCDP-131</u>	Louth County Council	154
<u>MN-C22-MCDP-132</u>	Fáilte Ireland	158
<u>MN-C22-MCDP-134</u>	Department of Housing, Local Government and Heritage	165
<u>MN-C22-MCDP-139</u>	Department of Environment, Climate and Communications	171
<u>MN-C22-MCDP-142</u>	Department of Education	176
<u>MN-C22-MCDP-143</u>	Armagh City, Banbridge and Craigavon Borough Council	181
<u>MN-C22-MCDP-145</u>	Eirgrid	183
<u>MN-C22-MCDP-148</u>	An Taisce	186

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-5</u>	Environmental Protection Agency (EPA)	N/A	N/A

Summary of Submission & Issues Raised

General

- The guidance document ‘SEA of Local Authority Land Use Plans – EPA Recommendations and Resources’ (copy attached to submission) sets out the EPA’s key recommendations for integrating environmental considerations into Land Use Plans and should be considered and the relevant recommendations incorporated into finalising and implementing the development plan.
- It should be ensured that the Development Plan aligns with the key relevant higher-level plans and programmes and is consistent with the relevant objectives and policy commitments of the National Planning Framework and the Northern and Western Regional Spatial and Economic Strategy.

Content of the Environmental Report

- Environmental Baseline: In October 2024, the EPA published its latest iteration of the State of the Environment Report. The information in the report should be considered and integrated as appropriate in finalising the SEA and implementing the Plan over its lifetime.
- Assessment of Environmental Effects: the full range of likely significant environmental effects of implementing the Plan should be assessed and documented. This shall include the potential for cumulative effects in combination with other relevant Plans/Programmes and Projects.
- Impact of Ammonia Emissions to Air: the potential impacts of ammonia emissions to air should be taken into account. The potential impacts on Natura 2000 sites from intensive pig and poultry installations are ammonia emissions to air and resultant nitrogen deposition. When above critical levels, ammonia adversely impacts biodiversity through eutrophication, acidification or direct toxic effect. Nitrogen deposition has been identified as one of the leading causes of global biodiversity decline, alongside changing land use practices and climate change. Associated with this, Ireland has been served with an infringement notice by the European Commission because of non-compliance with ammonia reduction commitments. In Ireland there is a significant concentration of licensed intensive agriculture sites in Counties Cavan and Monaghan. Over 70% of all EPA-licensed poultry farms are in County Monaghan. Owing to the density of intensive agriculture and the presence of Natura 2000 sites in the same region, the planning, development and permitting of intensive agriculture sites in this area needs to be carefully examined and managed to ensure that the sensitive Natura 2000 sites are protected.
- Assessment of Alternatives: The alternatives considered and how the selection and assessment of these has led to the selection of the preferred alternative should be described. The alternatives should be assessed against the ‘Strategic Environmental Objectives’ identified in the SEA Environmental Report.
- Mitigation Measures: Where the potential for likely significant effects has been identified, the appropriate mitigation measures to avoid or minimise these should be provided. The development Plan should include clear commitments to implement the mitigation measures.
- Monitoring: The Monitoring Programme should be flexible to take account of specific environmental issues and unforeseen adverse impacts should they arise. It should also consider and deal with the possibility of cumulative effects. Monitoring of both positive and negative effects should be considered. The programme should set out the various data sources, monitoring frequencies and responsibilities. If monitoring identifies adverse impacts during the implementation of the Plan, the Planning Authority should ensure that suitable and effective remedial action is taken.

- Submission notes that guidance on SEA related monitoring is available on the EPA website <https://www.epa.ie/publications/monitoring--assessment/assessment/strategic-environmental-assessment/06695-EPA-SEA-Statements-and-Monitoring-Report.pdf>

Future Amendments to the Plan

- Any future amendments to the Plan must be screened for likely significant effects using the same method of assessment applied in the 'environmental assessment' of the Plan.

SEA Statement- Information on the Decision

- Following the adoption of the Development Plan, an SEA Statement should be prepared which summarises:
 - How environmental considerations have been integrated into the Plan;
 - How the Environmental Report, submissions, observations and consultations have been taken into account during the preparation of the Plan;
 - The reasons for choosing the Plan adopted in the light of other reasonable alternatives dealt with; and,
 - The measures decided upon to monitor the significant environmental effects of implementation of the Plan.
- A copy of the SEA Statement should be sent to the environmental authorities consulted during the SEA process.
- Submission notes that guidance on preparing SEA Statements is available on the EPA website <https://www.epa.ie/publications/monitoring--assessment/assessment/strategic-environmental-assessment/06695-EPA-SEA-Statements-and-Monitoring-Report.pdf>.

Environmental Authorities

- In accordance with the SEA Regulations consultation with the following bodies is required:
 - Environmental Protection Agency;
 - Minister for Housing, Local Government and Heritage;
 - Minister for Environment, Climate and Communications;
 - Minister for Agriculture, Food and the Marine; and
 - any adjoining planning authority whose area is contiguous to the area of a planning authority which prepared a draft plan, proposed variation or local area plan.

Chief Executive Response

General

A Strategic Environmental Assessment to identify and evaluate the likely significant environmental effects of the implementation of the Draft Plan was carried out by Fehily Timoney Consultants and is contained within Appendix 16 of the Draft Development Plan.

A summary of key interacting plans, policies and strategies and its relevance to the Monaghan County Development Plan have been provided in Appendix 1 of the SEA.

The SEA process ensures that the Development Plan is aligned with higher-level plans, programmes and strategies, and accords with the relevant objectives and policy commitments contained within those plans. The National Planning Framework and the Northern and Western Regional and Economic Strategy are particularly pertinent to the Monaghan County Development Plan 2025-2031.

Content of the Environmental Report

The submission makes a number of points with respect to the content of the Environmental Report. The SEA has had due regard to the relevant provisions of the SEA Regulations and has presented the findings of the assessment in alignment with regulations. Table 3-2 in Section 3.4.4 SEA Environmental Report Checklist presents the relevant section of the SEA Environmental Report (ER) against the corresponding requirement of information to be included in the Environmental Report, with due regard to the SEA Directive and transposing national legislation.

Environmental Baseline

Baseline information from the EPA's State of the Environment Report (SOER 2024) – which was published in October 2024 – has been considered and integrated into Section 4 – The Environmental Baseline, of the SEA ER, as appropriate.

Assessment of Environmental Effects

A detailed evaluation of environmental effects associated with the Monaghan CDP has been carried out. The full range of likely significant environmental effects of implementing the Plan has been identified. This evaluation has considered all potential direct and indirect, cumulative, synergistic, short-, medium- and long-term, permanent and temporary, positive and negative environmental effects of the implementation of the Plan.

Impact of Ammonia Emissions to Air

The potential impact of ammonia emissions from agricultural and food and drink related activity has been considered within the environmental assessment undertaken. A variety of mitigation measures have been defined to prevent adverse effects associated with agricultural development and land use. Policy HCLP 10 has been specifically defined to ensure the protection of Natura 2000 sites from the impact of ammonia emissions from agricultural installations.

Assessment of Alternatives

The assessment of Alternatives has been presented in Section 6 of the SEA ER and has resulted in the development of a Draft Plan that achieves the best environmental outcomes in comparison to other reasonable alternatives considered. The assessment of the Reasonable Alternatives was undertaken in accordance with guidelines defined in the following documents:

1. Implementation of SEA Directive (2001/42/EC): Assessment of the Effects of Certain Plans and Programmes on the Environment, DEHLG 2004.
2. Developing and Assessing Alternatives in Strategic Environmental Assessment, EPA 2015.

All Reasonable Alternative considered have been assessed against defined SEOs.

Mitigation Measures

A comprehensive suite of environmental mitigation has been developed for the Plan. This mitigation is presented in Section 8 of the SEA Environmental Report and have been incorporated within the plan preparation. Additional text will be inserted into the Draft Plan to reinforce Monaghan County Councils' commitment to the implementation of the monitoring measures contained within the SEA.

Monitoring

Section 10 of the SEA ER contains a Monitoring Programme, which has been developed in accordance with EPA guidelines "*Guidance on SEA Statements and Monitoring*" (2023). The monitoring programme includes detail on the indicators, targets and data sources used to monitor and measure progress.

Future Amendments to the Plan

Any future amendments to the Plan will be screened for likely significant effects as legally required.

SEA Statement- Information on the Decision

The issue raised in the submission relating to the preparation of an SEA Statement is a legal requirement.

Environmental Authorities

The prescribed environmental authorities were consulted with as part of the SEA consultation process.

Chief Executive Recommendation

It is recommended that Section 1.13 in Chapter 1 'Introduction' is amended as follows:

1.13 Strategic Environmental Assessment (SEA)

The SEA Environmental Report which accompanies this Plan provides an understanding of the likely environmental consequences of decisions regarding development in County Monaghan. It has guided the preparation of policies and development alternatives for this Plan. **A comprehensive suite of environmental mitigation has been developed for the County Development Plan which is presented in Section 8 of the accompanying Strategic Environmental Assessment (SEA). Monaghan County Council commits to implementing these mitigation measures during the lifetime of the Plan.** A SEA statement has also been prepared and this summarises how environmental considerations have been integrated into the Plan, how consultations were taken into account and the reasoning behind the decisions made in light of other reasonable alternatives.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-22</u>	Department for Infrastructure (NI)	N/A	N/A

Summary of Submission & Issues Raised

- This Department shares much of the vision and ambitions set down in the Draft Monaghan County Development Plan.
- This submission provides an outline of the Development Plan system and process in N. Ireland. A Local Development Plan (LDP) will comprise two documents a Plan Strategy and Local Policies Plan. One will set out the Councils vision and objectives for the area. The other will set out local policies, site specific proposals, designations and land use zonings. Taking account of the Regional Development Strategy and Strategic Planning Policy Statement. Both are subject to public consultation and independent examination before adoption.
- The Department for Infrastructure has provided comments on the strategic aspects of the plans to all Councils which adjoin County Monaghan and at different stages of their plan preparation, covering topics such as growth strategies, infrastructure provision, environmental designations and climate change.
- The Department recognises Monaghan Council’s ambition to grow its population and its close working relationship with neighbouring Councils in N. Ireland may assist in the realisation of these goals.
- This Department previously co-chaired the Cross Border Development Plan Working Group and will continue to look for opportunities for collaborative working.

Transport and Infrastructure

- The Regional Development Strategy 2035 (RDS) seeks to develop and strengthen links between the North and South and East and West.
- The RDS recognises that opportunities that exist to collaborate on a north/south basis promoting the development of gateways and cross border connections and further developing this. Such co-operation can help unlock the potential for physical development, social infrastructure, physical infrastructure and economic development.
- The Draft Plan’s Strategic Objective SO 4 is welcomed.
- The A5 Key Transport Corridor which is an important economic corridor from Monaghan to North Donegal via Omagh and Derry and the recently published major roads prioritisation programme which includes this corridor, are reflected in the Core Strategy Objectives BRO 1 and TO 6.
- Cross border can benefit from sharing services and functionality such as the restoration of the Ulster Canal Greenway and Blueway and its network helping tourism initiatives and tourism economy on both sides of the border.
- The increased emphasis on decarbonisation of transport, including promotion of active travel and modal shift, as well as road safety is welcomed.

Conservation and Landscape

- The Draft Plan recognises this cross border green infrastructure and the intention to ensure the natural environment is maintained in a sustainable manner, with a collaboration and consistent approach with adjoining areas on matters of the environment and landscape protection.
- Taking a transboundary approach to ensure the integrity of such sites are maintained.
- Importance of cooperating with adjoining local authorities north of the border on matters of the environment and landscape protection.

Economic Development

- Importance of cross border cooperation and the functional relationships between settlements to foster economic development is welcomed.
- The Framework for Co-Operation (2013) is for mutual benefit and economic advantage. From a cross-border perspective this means continued progress in enhancing physical connectivity to allow sharing of infrastructure such as ports and airports.

Development Management

- Road Access Standards (Section 15.23) which broadly aligns with standards used in N. Ireland although it is recommended that these standards are extended to allow for restriction of accesses onto key corridors such as national roads. This policy is considered essential to ensure that such roads operate as intended i.e. they facilitate the safe and efficient movement of traffic over long distances and provide efficient links between the main cities, towns and sea and airports.

Chief Executive Response

The Council welcomes the comments put forward by the Department for Infrastructure and notes the recommendation in respect of the request to restrict accesses onto key corridors.

The importance of cross border co-operation, shared service/functionality, and collaboration is acknowledged and encouraged going forward in respect of tourism, transport and infrastructure, economic development, conservation and landscape protection.

Chief Executive Recommendation

No amendments recommended.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MDCP-25</u>	Fermanagh & Omagh District Council	N/A	N/A

Summary of Submission & Issues Raised

- Submission states that Fermanagh and Omagh District Council adopted the Development Plan 2030: Plan Strategy on 16 March 2023. The Plan Strategy is the first of two development plan documents which will comprise of the Local Development Plan. The Plan Strategy provides a Plan-led framework for the District Council to deliver sustainable development including future housing, employment, retail and infrastructure.
- The policies set out within the Plan Strategy are now relevant and supersede Planning Policy Statements and A Planning Strategy for Rural Northern Ireland within the Fermanagh and Omagh Council District. Appendix 8 within the Plan Strategy sets out the existing Policy Designations in the Fermanagh Area Plan 2007 and Omagh Area Plan 2002 which still apply.
- Submission states that the preparation for the second document the Local Development Plan – Local Policies Plan (LPP) has commenced and will set out the Council’s policies in relation to the development and use of land in its district. The LPP will include local policies, including site specific proposals, designations, and land use zonings.
- The submission notes that the Planning Committee discussed the draft Monaghan County Council Development Plan 2025-2031, at its meeting in October 2024 and noted no conflict with the Council’s Plan Strategy
- The Council welcomes consultation on any significant planning applications or other planning matters of common interest in the future
- Submission notes that the proposed approach to climate change adaption and reduction in greenhouse gas emissions aligns with Strategic Objective 14 of the Fermanagh and Omagh Plan Strategy which states “*Follow the principles of sustainability and high quality design standards in all developments to assist with meeting Climate Change targets and place-making*”.
- Strategic Policy SP01 of the Fermanagh and Omagh Plan Strategy- Further Sustainable Development, states that the Council will permit proposals which further sustainable development and promote measures to mitigate and adapt to climate Change. Fermanagh and Omagh District Council welcomes the approach to climate change and any provisions which accelerate a transition to a climate resilient and environmentally sustainable economy.
- The submission notes that the proposed approach to climate change adaptation and mitigation is reflective of the decarbonisation section within the draft Programme for Government and therefore may be indicative of the likely regional policy approach within the revised SPPS.

Key Challenges

- The submission summarises the key challenges identified for County Monaghan within the Draft Development Plan and comments that the challenges are similar to those experienced within the Fermanagh and Omagh District Council area.

Strategic Objectives

- The submission provides a summary of the 10 Strategic Objectives contained within the Draft Development Plan and states that there is no conflict with the Strategic Objectives within the Fermanagh and Omagh Plan Strategy.

National Policies and Strategies

- Having regard to the Strategic Environmental Assessment (SEA) and the Appropriate Assessment (AA), submission recommends that the Northern Ireland Environment Agency within the Department of Agriculture, Environment and Rural Affairs (DAERA) is consulted in

relation to any policies which have the potential to impact upon designated sites within the District.

Cross Border Context

- The submission notes that the Draft Plan recognises that the high level of cross border social and economic interactions between County Monaghan and its neighbouring counties in Northern Ireland is difficult to quantify.
- Fermanagh and Omagh District Council welcomes the recognition of a high level of cross border social and economic interactions between County Monaghan and Fermanagh and Omagh District Council. Submission agrees that any policy approach should recognise and reflect these interactions and would welcome further discussion in relation to cross boundary interactions to ensure that the opportunities which arise are maximised.

Core Strategy

- The Core Strategy Strategic Objective aligns with the Strategic Objectives within the Fermanagh and Omagh Plan Strategy.
- The detail of the main aims of the Core Strategy (page 21 of the Draft Development Plan) reflects a sustainable approach to development within County Monaghan.

Economic Development Strategy

- The submission notes the Core Strategy of the Draft Plan must take account of the economic function of designated settlements to ensure the focus of growth is commensurate to the size and function of the settlements. The settlement hierarchy sets out how the settlement tiers are expected to grow during the lifetime of the plan with the quantum of land zoned for industry and employment taking account of the settlement hierarchy and its role and function.
- Submission notes that this approach aligns with the spatial growth strategy within the Fermanagh and Omagh Plan Strategy. The new A5 Western Transport Corridor project and the suggested transboundary route to link the A5 Western Transport Corridor project project in the north with the N2 Clontibret to Border Road Scheme, will be an important material consideration in this process.

Settlement Hierarchy

- Submission notes that there are similarities between the Settlement Hierarchy for County Monaghan and that for the Fermanagh and Omagh District Council area, both of which reflect the role and function of the settlements at each level.

Tourism

- Fermanagh and Omagh District Council welcome and support the policy approach to the development of the Ulster Canal for tourism and recreational purposes and the commitment and ongoing work by both Council's in relation to this key project. The Fermanagh and Omagh District Plan Strategy contains a specific policy (Policy OSR05) which seeks to safeguard the Ulster Canal, and the Council will not support any development which would prejudice the future development or restoration of the Ulster Canal.

A5 Western Transport Route

- The proposed upgrade of the A5 is planned through the Department for Infrastructure's A5 Western Transport Corridor project. As the design of both projects progress, it is becoming apparent that a transboundary route may be required to link the A5 Western Transport Corridor project in the north with the N2 Clontibret to Border Road Scheme.
- Fermanagh and Omagh District Council notes the recent announcement in relation to the new A5 Western Transport Corridor project and also welcomes and supports the recognition of the need for a transboundary route to link with the A5 Western Transport Corridor project in the North with the N2 Clontibret to Border Road Scheme. The submission notes that this would help to maximise cross border opportunities for both districts.

Chief Executive Response

The content of the submission received from Fermanagh and Omagh District Council is noted and the acknowledgment that the Draft Development Plan aligns with the Fermanagh and Omagh District Council Plan Strategy 2030 is welcomed.

As part of the preparation of the Draft Plan, the Northern Ireland Environment Agency within the Department of Agriculture, Environment and Rural Affairs (DAERA) was consulted in accordance with S.I. No. 436/2004 Planning and Development (Strategic Environmental Assessment) Regulations 2004.

The Chief Executive recognises the importance of consulting and co-operating with cross border Authorities as part of the plan making process and looks forward to continuing to work alongside Fermanagh and Omagh District Council to support and promote cross border co-operation and connections.

Chief Executive Recommendation

No amendments recommended.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-48</u>	Transport Infrastructure Ireland	N/A	N/A

Summary of Submission & Issues Raised

Managing Exchequer Investment and Statutory Guidance

Core Strategy: Having regard to policy provisions to safeguard the existing and planned strategic national road network, TII welcomes strategic objective SO 10, ‘To maintain the strategic capacity and safety of the national roads network and to safeguard the investment in national roads.’ It is noted that the Core Strategy Map (Map 2.1) includes Strategic Transport Corridors as required (sec. 10 (2b) P&D Act 2000 (as amended), but that Chapter 2 ‘Core Strategy’ makes no reference to the strategic national road network in the county. TII considers the Core Strategy would benefit from reflecting the strategic objective to safeguard the existing national road network as well as providing for the identified road improvements.

TII recommend the inclusion of Key Strategic Policies and Strategic Objectives in Core Strategy.

- a) To maintain the strategic function, capacity and safety of the national roads network, including planning for future capacity enhancements, and
- b) To ensure that the existing extensive transport networks, which have been greatly enhanced over the last two decades, are maintained to a high level to ensure quality levels of service, safety, accessibility and connectivity to transport users.

Reason. To ensure conformance with official policy provisions included in RPO 6.5 / NPO 74 / NSO 2.

Section 28 Guidance: Spatial Planning and National Roads Guidelines

Access to National Roads: TII notes there are no ‘exceptional circumstances’ to National Roads Access policy, and the Planning Authority should be aware of the requirement for a plan-led approach and included in CDP, as clarified in NRP 5.

TII recommends the review of the text of ISO 8 to reflect that of NRP 4 in the interests of clarity and consistency.

Reason. To ensure conformance with official policy provisions included in RPO 6.5 / NPO 74 / NSO 1 and NSO 2 and intrinsically the safety capacity and efficiency of the national network.

ISO 8: To control and restrict any new direct access points or intensification of use of existing accesses onto the national road network within the general speed limit areas in accordance with the Spatial Planning and National Planning Guidelines (2012) or any new or updated/subsequent versions, and all relevant policies contained within the Monaghan County Development Plan 2025-2031.

NRP 4: To protect the traffic carrying capacity of National Roads, the level of service they deliver and the period over which they continue to perform efficiently, by avoiding the creation of new access points or the generation of increased traffic from existing accesses onto the N2, N53, N54, and N12 outside the 60 km/h speed limit, in accordance with Section 2.6 of the DoECLG Spatial Planning and National Road Guidelines, and in consultation with the TII.

Single Houses in the Countryside: Noting the Draft ‘Rural Settlement Strategy’ and having regard to the extensive and largely rural nature of the strategic national road network in the county, it is considered such development proposals for single housing in the countryside have the potential to result in a demand for access to the strategic road network.

TII recommends consideration should be given to include a cross reference in Section 2.12 and/or Section 2.13 and Section 15.8 and 15.9 of the draft Plan referring to National Road Policy NRP 4 in the interests of providing clarification and early assistance to applicants in the preparation of any rural housing planning application where there may be implications for the strategic national road network in the area.

Strategic Economic Development Locations, including Rural Economic Development: TII recommend the inclusion of clarification and as an advisory to potential applicants for economic development proposals in strategic development locations and in general rural areas, of the requirement to adhere to provisions of official policy on access to national roads, to be reflected in a new Economic Development objective Chp. 4, section 4.7, such as, *'Proposals for economic development, including those related to strategic economic locations in the Development Plan and rural enterprise proposals will be progressed complementary to safeguarding the strategic function, safety and investment in the strategic national road network to date and in compliance with the provisions of the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012).'*

TII also recommends cross reference in Chapter 4 and the range of economic categories included in those Sections of the Draft Plan cross referencing to NRP 4 and the policy requirement to avoid the creation of any new direct access points from development or the generation of increased traffic from existing direct/egress points to the national road network, to which speed limits greater than 60 km/h apply., in particular Section 4.8 'Agriculture and Forestry', Section 4.9 'Extractive Industry', Section 4.10 'Small Scale Businesses in Rural Areas', Section 4.11 'Home Based Activities' as well as Section 4.12 'Tourism' where proposals may be promoted in rural locations and related Development Management Standards in Section 15.12.2 and Sections 15.13 to 15.18.

Reason: To ensure conformance with official policy provisions included in RPO 6.5 / NPO 74 / NSO 2. Such cross-referencing would provide clarification and early assistance to applicants in the preparation of any planning application where there may be implications for the strategic national road network in the area and clearly identify, at an early stage, any policy conflicts related to access to national roads for the applicants to address.

Retailing: TII recommend in the interest of clarity, a new policy or retail objective in section 4.6 of the Draft to reference explicit presumption against large out of town retail centres located adjacent or close to existing, new or planned national roads/motorways reflecting policy outlined in the Retail Planning Guidelines, 2012.

Reason: To ensure conformance with official policy provisions included in RPO 6.5 / NPO 74 / NSO 1 and NSO 2.

Transport Planning and National Road Schemes

National Road Scheme Planning: TII welcomes policies and protections for proposed national roads projects, N2 Clontibret to NI border and N2 Ardee to south of Castleblayney. However, TII notes additional schemes included in Table 7.3 and section 7.3, 'Roads in Urban Areas' and in the individual Settlement Plans that are not identified in the current National Development Plan, 2021-2030. Notes these schemes are subject to budget restraints and that relative priority or timeframe may be subject to alteration, along with TII priorities for maintenance.

Appropriate Assessment requirements: TII recommends the consideration of a number of associated policies and objectives, generally across Chp. 6 'Heritage, Conservation, and Landscape', HCLP 4 and HCLP 7, to ensure conformance with Article 6(3) and 6(4) of the Habitats Directive in the interests of clarity and to avoid any unintended consequences. TII refers to use of text that refers to 'no projects ..shall be permitted', 'resist development', 'any plan or project... will not be permitted', as examples

which appear to not accurately reflect the provisions of Article 6(3) and Article 6(4) of the Habitats Directive.

Other Transport Proposals

Integration of Land Use Planning and Transport: TII recommends consideration of the following:

- that Policy NRP 7 should reference 'TII Publications' and not only 'design standards.' In addition, in association with references to DMURS, and for the Council to reference complementary requirements included in TII Publications, where national roads are impacted.
- Incorporation of reference to TII Publications Standard DN-GEO-03084 'The Treatment of Transition Zones to Towns and Villages on National Roads' in the Development Plan in the interests of providing clarification that such a standard will be applied, in the interests of road user safety, national roads, complementary to DMURS principles, note also Policy ATP 4.
- The Council will be aware that it remains the requirement that a Design Report is completed and submitted for works to national roads in accordance with TII Publications DN-GEO-03030 (Design Phase Procedure for Road Safety Improvement Schemes, Urban Renewal Schemes and Local Improvement Schemes).
- Reference to complementary TII Publications in association with references to DMURS in the Plan where national roads are impacted.
- Consultation with the Council's Road section in the interests of providing the most up to date position in terms of the identification of potential sites and the provision of Park and Share facilities.

Ancillary Policy Provisions and Issues

Service Areas: TII recommends the inclusion of a reference in the Plan to the policy position reflected in Section 2.8 of the DoECLG Spatial Planning and National Roads Guidelines relating to the co-ordinated forward planning approach required to avoid the proliferation of off-line service areas at national road junctions as well as the policy on direct access and intensification of existing access to national roads for service areas on national roads where facilities can be provided in a sustainable manner in the villages and towns that the non-motorway national road network passes through or is in close proximity to.

Safeguarding National Road Drainage Regimes: Noting incidents nationally of private development proposals haven accessed or sought to access national road drainage regimes to dispose of surface water drainage, TII recommends a new objective, *'The capacity and efficiency of the national road network drainage regimes in County Monaghan will be safeguarded for national road drainage purposes.'*

Renewable Energy Development: TII recommends that Solar Farm Renewable Energy Development proposals in the vicinity of the strategic national road network should be accompanied by glint and glare assessments and that such a requirement should be included as an objective of the Development Plan prior to adoption.

Grid Development and Grid Connection Routing: TII observes from experience that grid connection accommodated on national roads has potential to result in technical road safety issues such as differential settlement due to backfilling trenches and can impact on ability and cost of general maintenance, upgrades and safety works to existing national roads. Proposed recommendation to include an objective in the Plan, in relation to renewable energy and in relation to safeguarding the

national road network, indicating that grid connection cable routing should seek to consider alternatives, where available, in the interests of identification of a routing ‘optimal solution.’

Traffic and Transport Assessment (TTA), Road Safety Audit (RSA) and TII Publications (Standards): Acknowledges requirements for TTA & RSA is addressed at section 7.2 and associated Development Management Standards in section 15.23, though no related policy or objective appears to be included.

TII recommends planning applications for significant development proposals should be accompanied with TTA to be carried out by suitably competent consultants, which are assessed in association with their cumulative impact with other relevant developments on the road network. Guidance in relation to TTA is given in the ‘Traffic Management Guidelines’. TII would welcome reference in the Plan to the requirement to adhere to TII TTA Guidelines where national roads are impacted.

In relation to agricultural underpasses, TII recommends reference TII Publications DN-STR-03001 (Technical Acceptance of Road Structures on Motorways and Other National Roads) in section 15.26

Noise: TII acknowledges and supports the inclusion of policies to identify and mitigate against noise sensitive development.

Signage: TII acknowledges and supports the inclusion of policies relating to signage along national roads.

Greenways/Active Travel: Consultation with the Council’s own internal project and/or design staff is recommended.

Settlement Plans / Development Strategies:

Masterplans and Local Area Action Plans: TII notes that mechanisms and governance associated with the preparation of masterplans has not been outlined. This is of particular concern to TII with potential to impact the strategic road network in the area.

Monaghan Town Settlement Plan 2025 – 2031: Notes significant amount of employment lands along national roads.

Lands at Tullygrimes – section 10.7 outlines requirements to facilitate development of these lands, TII are concerned the requirements outlined do not fully reflect the agreed position between MCC & TII in relation to the proposed access strategy in accordance with Appendix D2 of MLUTS and related amendments outlined in TII’s correspondence of February 2019. TII recommends the agreed access strategy should be reflected in final Plan.

Lands at Knockaconny – (N2 & N12) including associated link road through Industry Enterprise Employment lands – include lands where 100 kph limit applies, and access via Annahagh roundabout on the N2, also at a location where 100 kph limit applies. TII recommends access proposals should be reviewed and clarified prior to the adoption of the Plan.

TII would welcome engagement on the preparation of the Local Transport Plan and road schemes identified for development locally should be developed complementary to safeguarding the national road and in consultation with and subject to agreement of TII.

Carrickmacross Town Settlement Plan 2025 – 2031: Proposals in proximity to N2 junctions to be assessed to ascertain implications of traffic generation on the safe and efficient operation of the N2 and associated junctions and consider cumulative impact of development in the area and be subject to Traffic and Transport Assessment as appropriate. TII would welcome engagement on LTP, road schemes, Park & Ride.

Castleblayney Town Settlement Plan 2025 – 2031: Proposals in proximity to N2 junctions to be assessed to ascertain implications of traffic generation on the safe and efficient operation of the N2 and associated junctions and consider cumulative impact of development in the area and be subject to Traffic and Transport Assessment as appropriate. Notes N53 zoning proposals may extend outside the 50-60 kph limit, recommend access would be accommodated within the reduced urban speed limit. TII would welcome engagement on SUMP, road schemes, Muckno masterplan

Clones Town Settlement Plan 2025 – 2031: Notes discrepancy - Draft advises most of land zoned IEE is adjacent to N54 within 60 kph, this does not appear to be correct. TII's records indicate the extensive IEE lands to the east of Clones adjoining the N54, will require resolution to ensure development proceeds in adherence with provisions of official policy. TII would welcome engagement on SUMP, road schemes.

Core Strategy Tier 4 Settlements: notes settlement boundaries applied to Clontibret North and Emyvale plans extend into areas subject to the study area associated with N2 Clontibret to the Northern Ireland border, recommends consultation with Council's project/design team. TII recommends it is critical that corridors for national road schemes are safeguarded pending the delivery of any scheme; Section 2.3 and section 2.9 of DoECLG Spatial Planning and National Roads Guidelines refers.

Chief Executive Response

Managing Exchequer Investment and Statutory Guidance

Core Strategy: Noting the TII request for inclusion of key strategic policies and strategic objectives in the Core Strategy, the existing policies contained in the draft Plan are considered sufficient to ensure that the safety of the national road network is not compromised. The Plan should be read as a whole document, with individual chapters and sections not to be considered in isolation. The repetition of policies and objectives at individual sections would substantially add additional unnecessary volume to the document.

Section 28 Guidance: Spatial Planning and National Roads Guidelines:

Access to National Roads: Noting the TII request re. alignment of wording of ISO 8 and NRP 4, the effect of the policies does not give rise to contrary intentions to compromise road safety.

Single Houses in the Countryside: Noting the TII request for cross-referencing of NRP 4 to other sections of the Plan, it is noted that the Plan should be read as a whole document, with individual chapters and sections not to be considered in isolation. The repetition of policies and objectives at individual sections would substantially add additional unnecessary volume to the document.

Strategic Economic Development Locations, including Rural Economic Development: Noting the TII request for cross-referencing to other sections of the Plan, it is noted that The Plan should be read as a whole document, with individual chapters and sections not to be considered in isolation. The repetition of policies and objectives at individual sections would substantially add additional unnecessary volume to the document.

Retail Planning: Noting the TII request for a new policy or retail objective to reference explicit presumption against large out of town retail centres that would impact national road network, the existing County Monaghan Retail Strategy, along with the draft Plan retailing objectives and policy, along with the National Roads policies are considered adequate to ensure the integrity of the national road network. The draft Plan also commits to preparing a new County Retail Strategy during the lifetime of the Plan, which will have consideration for national roads policy and will include for consultation with TII in preparing the retail strategy.

Transport Planning and National Road Schemes

Appropriate Assessment Requirements: Noting the TII request for policies HCLP 4-7 to reflect the provisions of Article 6(3) and Article 6(4) of the Habitats Directive, and also the comments from Fehilly Timoney SEA/AA consultants, it is proposed to amend the relevant Heritage, Conservation and Landscape Policies, HCLP 4 – 7 from existing in black with a strikethrough to amended text:

~~**HCLP 4:** To resist development in or adjacent to any Natura 2000 site (SPA or SAC) where it would result in the deterioration of that habitat or any species reliant on it. The onus will be on the developer to demonstrate that such development will not adversely impact on the qualifying interests of such sites subject to the preparation of an appropriate assessment exercise under the provisions of the EU Habitats Directive.~~

Amend with new HCLP 4: Any plan or project in the Plan area not directly connected with or necessary to the management of a Natura 2000 site but likely to have a significant effect on a Natura 2000 site(s), either individually or in-combination with other plans or projects, shall be subject to Appropriate Assessment, in view of the site’s conservation objectives; in accordance with Article 6(3) and Article 6(4) of the Habitats Directives (92/43/EEC), transposing national legislation, and applicable European and national guidelines.

~~**HCLP 5:** To resist development in or adjacent to an NHA or pNHA, listed in Tables 6.2 and 6.3 of the Monaghan County Development Plan 2025-2031, where it would result in the deterioration of that habitat or detrimentally impact on any species reliant on it. The onus will be on the developer to demonstrate that any such development will not adversely impact on the conservation of such areas.~~

Amend with new HCLP 5: Monaghan County Council shall complete Appropriate Assessment, where required as a Competent Authority, in accordance with Article 6 of the Habitats Directive; and shall only grant consent for developments projects after having ascertained that such projects will not adversely affect the integrity of any Natura 2000 site.

~~**HCLP 6:** To ensure that all development proposals comply with the Department of the Environment, Heritage and Local Government publication, Appropriate Assessment of Plans and Projects in Ireland- Guidance for Planning Authorities 2010 or any new or updated/subsequent version.~~

Amend with new HCLP 6: Protect, conserve and enhance natural heritage, insofar as practicable having regard to the remit of the Council; including Natura 2000 sites (SPAs and SACs), proposed Natura Heritage Areas (pNHAs), other designated sites, and non-designated areas of high nature conservation value known as locally important areas which also serve as ‘Stepping Stones’ for the purposes of Article 10 of the Habitats Directive, improving the ecological coherence of Natura 2000 sites.

~~**HCLP 7:** Any plan or project that could have a significant adverse impact (either by themselves or in combination with other plans and projects) upon the conservation objectives of any Natura 2000 site will not be permitted.~~

Amend with new HCLP 7: Prevent the carrying out of development that would destroy or significantly alter, damage or interfere with the integrity of a pNHA/NHA, or any of its species, communities, habitats; landforms or geological or geomorphological features; or on its diversity of natural attributes.

Other Transport Proposals

Integration of Land Use Planning and Transport: Noting TII requests for the addition of references to TII publications and requirements, it is proposed to include reference to the following documents at Chapter 7.2 Paragraph 9:

- The Treatment of Transition Zones to Towns and Villages on National Roads (DN-GEO-03084)
- Design Phase Procedure for Road Safety Improvement Schemes, Urban Renewal Schemes and Local Improvement Schemes (DN-GEO-03030)

It is proposed to amend Policy NRP 7 (with the following insertion in red): ‘Access and road design details on National Roads shall comply with TII Publications and design standards. Any development with the potential to impact on the carrying capacity and/or safety of any National Primary or National Secondary Road shall include proposals to avoid, remedy or mitigate the impact on the National Road Network. Such proposals may include the payment of a contribution toward the cost of any required mitigation works.’

Ancillary Policy Provisions and Issues

Service Areas: Noting the TII request for the inclusion of policy provisions in respect of safeguarding the network and for a coordinated approach to provision, it is proposed to amend Chapter 7.6.1, second paragraph, ‘Service areas may include parking for cars and heavy commercial vehicles; provision of food, fuel, toilet and shower facilities, play areas and convenience stores. With the transition to electric vehicles, service areas are becoming increasingly important as opportunities to recharge on longer distance journeys, and it is important that service users have access to other services such as waiting areas and Wi-Fi. To avoid a proliferation of service areas, ~~and to ensure their long-term viability, the need for a coordinated approach may be required between planning authority areas and with reference to the national policy.~~ Monaghan County Council Planning Authority will engage in a coordinated approach with TII. Any plans or proposals will take cognisance of the policies set out in Section 2.8 of the DoECLG Spatial Planning and National Roads Guidelines.’

Safeguarding National Road Drainage Regimes: Noting TII’s comments on safeguarding national road drainage, it is considered prudent to include a policy in respect of all public roads. Insert new paragraph (6) at Chapter 15.22.7 Surface Water Drainage: ‘Public Road surface water drainage regimes are constructed with the objective of disposing of road surface water, it is important that capacity in the drainage regime is retained to address this function.’ And include for new Surface Water Drainage policy, **SWDP 2:** Development proposals shall ensure the capacity and efficiency of the public road network drainage regimes in County Monaghan will be safeguarded for road drainage purposes.

Renewable Energy Development and Grid Development and Grid Connection Routing: Noting TII’s comments on glint and glare assessments for solar farms and safeguarding the national road network in respect of grid connection cabling, Development Management Standards 15.17 addresses requirements for renewable energy proposals, including associated infrastructure and connection to the grid, which includes for glint and glare impacts. The Renewable Energy Strategy, when prepared will also address further the requirements for renewable energy proposals.

Traffic and Transport Assessment (TTA), Road Safety Audit (RSA) and TII Publications (Standards): Noting TII’s observation of the Draft Plan not having a policy or objective in respect of TTA & RSA requirements, Transport Planning Objective TO 6 addresses this sufficiently: To protect, improve and invest in our national, regional and local roads and to safeguard the strategic transport links to and from urban centres which are identified as key economic drivers in the region. Noting TII comments in relation to requirements to adhere to TII TTA Guidelines where national roads are impacted, the following is proposed:

Amend Chapter 7.2 Paragraphs 9 and 12 Planning for Sustainable Transport in County Monaghan, as follows (additions in red):

Paragraph 9: The following guidance documents published by the NTA 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, and
- Guidance Note on Area Based Transport Assessment (NTA and TII),
- TII publication standard DN-GEO-03084, The Treatment of Transition Zones to Towns and Villages on National Roads
- TII publication standard DN-GEO-03030, Design Phase Procedure for Road Safety Improvement Schemes, Urban Renewal Schemes and Local Improvement Schemes

Paragraph 12: Proposals for development in urban areas including villages will be subject to the provisions contained within the Design Manual for Urban Roads and Street (DMURS). In exceptional circumstances, consultation with TII in respect of urban national roads may be required and complimentary requirements included in TII publications may be applicable.

Include a new Transport policy in respect of the requirement for Traffic and Transport Assessment, **New Policy TP 11:** To require that new development proposals that are subject to Traffic and Transport Assessment are carried out in accordance with the requirements set out in the TII Traffic and Transport Assessment Guidelines.

Amend Chapter 15.26 Paragraph 3, point c) to include the following :

- c) Incorporate aspects of TIIs technical acceptance and specification procedures for structures on the design and installation of the underpass including:
 - Technical Acceptance Report
 - TII publication DN-STR-03001 (Technical Acceptance of Road Structures on Motorways and Other National Roads)
 - Certification – Design, Check and Completion
 - TII Series 2500 Specification and Standard Construction Details, such as CC-SPW-02500 Specification for Road Works – Special Structures (2021)

Amend typing error in Access Underpass Policy LAUP 1: All access underpass development proposals shall comply with ~~Section 15.25~~ Section 15.26 of the Monaghan County Development Plan 2025-2031.

Agricultural underpasses: Noting TII recommendations, Development Management Standards section 15.26 is considered to adequately address development requirements in respect of Agricultural underpasses.

Noise, Signage, Greenways/Active Travel: TII comments / observations are noted and do not require any changes to the Plan.

Settlement Plans / Development Strategies:

Masterplans and Local Area Action Plans: Noting TII comments on mechanisms and governance associated with the preparation of masterplans, the Planning Authority has engaged the statutory processes of consultation and variations for master plans that have been prepared and will engage in such processes in the preparation of any future plans.

Monaghan Town Settlement Plan 2025 – 2031: Noting the comments in relation to land parcels at Tullygrimes and Knockaconny and on the preparation off Local Transport Plans, the following amendments are proposed. New policies TP12 and TP13 to be inserted to ensure safeguarding of national road network and Traffic and Transport Assessment as appropriate (detailed below).

Amend from paragraph 4 of section 10.7 as follows (insert text in red):

‘Recognising the strategically important parcel of zoned industry, enterprise and employment lands at Tullygrimes and Cornecassa Demesne, Monaghan County Council will facilitate and promote the sustainable development of these lands to consolidate, expand and complement existing significant enterprise activities at this location. The Monaghan Land Use and Transportation Study (MLUTS) recommend the relocation of the 60 kph speed limit westwards on the N54. To facilitate this the following is required:

- The relocation of the 60kph speed limit zone 440m west of its existing location, and
- A new gateway to the west of Monaghan Town.

In recognising the strategically important parcel of zoned industry, enterprise and employment lands at Knockaconny, Monaghan County Council will facilitate and promote the sustainable development of the town as well as consolidating, expanding and complementing existing significant enterprise activities at this location.

Approximately 237 hectares of land has been zoned for industry, enterprise and employment in Monaghan Town as indicated on Map MDP 1 of the Monaghan County Development Plan 2025-2031. The provision of sufficient zoned industry, enterprise and employment lands will provide certainty and clarity for all potential developers and encourage the location of new industries in the town.’

Carrickmacross Town Settlement Plan 2025 – 2031: Noting the TII comments in relation to proposals in proximity to N2 junctions, along with observations on Local Transport Plan, road schemes and Park & Ride. The following is proposed. New policies TP12 and TP13 to be inserted to ensure safeguarding of national road network and Traffic and Transport Assessment as appropriate (detailed below). Comments in relation to engagement on plans, road schemes are noted.

Amend Carrickmacross Roads and Traffic Management Objectives CMO 8 with the addition of text in red: **CMO 8** ‘To protect, design and develop new road and road upgrade projects identified during the lifetime of this plan, subject to resources. Road schemes and Park & Ride schemes proposed and identified for development locally will be developed complementary to safeguarding the strategic function of the national road network. Proposals impacting on the national road network should be developed in consultation with and subject to the agreement of TII.’

Castleblayney Town Settlement Plan 2025 – 2031: Noting TII comments in relation to proposals in proximity to N2 junctions, along with observation on N53 speed limit, new policies TP12 and TP13 to be inserted to ensure safeguarding of national road network and Traffic and Transport Assessment as appropriate (detailed below). Comments in relation to engagement on plans, road schemes are noted.

Clones Town Settlement Plan 2025 – 2031: Noting TII’s comments regarding IEE zoning to the east of Clones outside the 60 kph requiring resolution, the following proposed text amendments to section 13.9 will address this. New policies TP12 and TP13 to be inserted to ensure safeguarding of national road network and Traffic and Transport Assessment as appropriate (detailed below). Comments in relation to engagement on plans, road schemes are noted. The following text is to be inserted after the first paragraph in Section 13.9, page 277- Recognising the strategically important parcel of zoned industry, enterprise and employment lands to the northeast of Clones adjoining the N54 national road where a 80km/h speed limit currently exists, Monaghan County Council will facilitate and promote the sustainable development of these lands to consolidate, expand and complement existing significant enterprise activities at this location. To facilitate this, the following will be considered and appropriate measures put in place-

- The N54 will be traffic calmed in accordance with TII Standards. This will include a review of speed limits and provision of infrastructure to compliment any traffic calming proposals.
- Any work regarding traffic calming shall be in accordance with TII Standards and Safety Audit requirements.
- Any proposals for traffic calming retrofitted onto existing pavements shall not compromise the structural integrity of the existing pavement. The installation of coloured surfaces that are trafficked shall comply with the requirements of TII Publication DN-PAV-03023 and CC-SPW-00900. All pavement works on the national road network shall comply with TII Specification for Roadworks CC-SPW-00900.
- The costs of implementation works, including any subsequent relocation of the speed limit and traffic calming, shall be a matter for the Council and/or applicant/developer as TII will not be responsible for funding or undertaking works for the benefit of private development interests.

Core Strategy Tier 4 Settlements: Noting TII comments regarding the settlement boundaries of villages and potential of Clontibret North and Emyvale plans to extend into areas subject to the study area associated with N2 Clontibret to the Northern Ireland border, while areas of the settlement plans for Clontibret and Emyvale may fall within the 400m Preferred Route Corridor for the N2 Clontibret to Border Road Scheme, the design of the project has progressed to a stage where a route alignment is available, and the settlement areas do not currently affect the proposed road. Furthermore, Objective NRP 3 of the CDP states Monaghan County Council aims *‘To resist development that could add cost, complexity or prejudice the delivery of National Road projects listed in Table 7.3.0 – where developments are proposed that may impact the N2 Clontibret to Border Road Scheme, the project team is consulted as a matter of course.*

In response to TII requests for objectives relating to specific towns, settlements with regard to strategic function of the national road network and safeguarding the national network, new policies are proposed to be inserted at Chapter 7.2 Planning for Sustainable Transport in County Monaghan:

New Policy TP 12: Road schemes proposed and identified for development locally will be developed complementary to safeguarding the strategic function of the national road network and proposals impacting on the national road network should be developed in consultation with and subject to the agreement of TII.

New Policy TP 13: Development proposals in proximity to the N2 junctions shall be appropriately assessed to ascertain the implications of traffic generation on the safe and efficient operation of the N2 and associated junctions. Proposals should consider the cumulative impact of development in the area and be subject to Traffic and Transport Assessment as appropriate.

Chief Executive Recommendations

New policies / amendments recommended.

To amend the wording of Heritage, Conservation and Landscape Policies HCLP 4 – 7 (strikethrough to delete, new text in red):

~~HCLP 4: To resist development in or adjacent to any Natura 2000 site (SPA or SAC) where it would result in the deterioration of that habitat or any species reliant on it. The onus will be on the developer to demonstrate that such development will not adversely impact on the qualifying interests of such sites subject to the preparation of an appropriate assessment exercise under the provisions of the EU Habitats Directive.~~

Amend to new HCLP 4: Any plan or project in the Plan area not directly connected with or necessary to the management of a Natura 2000 site but likely to have a significant effect on a Natura 2000 site(s),

either individually or in-combination with other plans or projects, shall be subject to Appropriate Assessment, in view of the site's conservation objectives; in accordance with Article 6(3) and Article 6(4) of the Habitats Directives (92/43/EEC), transposing national legislation, and applicable European and national guidelines.

~~HCLP 5: To resist development in or adjacent to an NHA or pNHA, listed in Tables 6.2 and 6.3 of the Monaghan County Development Plan 2025-2031, where it would result in the deterioration of that habitat or detrimentally impact on any species reliant on it. The onus will be on the developer to demonstrate that any such development will not adversely impact on the conservation of such areas.~~

Amend to new HCLP 5: Monaghan County Council shall complete Appropriate Assessment, where required as a Competent Authority, in accordance with Article 6 of the Habitats Directive; and shall only grant consent for developments projects after having ascertained that such projects will not adversely affect the integrity of any Natura 2000 site.

~~HCLP 6: To ensure that all development proposals comply with the Department of the Environment, Heritage and Local Government publication, Appropriate Assessment of Plans and Projects in Ireland- Guidance for Planning Authorities 2010 or any new or updated/subsequent version.~~

Amend to new HCLP 6: Protect, conserve and enhance natural heritage, insofar as practicable having regard to the remit of the Council; including Natura 2000 sites (SPAs and SACs), proposed Natura Heritage Areas (pNHAs), other designated sites, and non-designated areas of high nature conservation value known as locally important areas which also serve as 'Stepping Stones' for the purposes of Article 10 of the Habitats Directive, improving the ecological coherence of Natura 2000 sites.

~~HCLP 7: Any plan or project that could have a significant adverse impact (either by themselves or in combination with other plans and projects) upon the conservation objectives of any Natura 2000 site will not be permitted.~~

Amend to new HCLP 7: Prevent the carrying out of development that would destroy or significantly alter, damage or interfere with the integrity of a pNHA/NHA, or any of its species, communities, habitats; landforms or geological or geomorphological features; or on its diversity of natural attributes.

To amend Policy **NRP 7** (in red): 'Access and road design details on National Roads shall comply with TII Publications and design standards. Any development with the potential to impact on the carrying capacity and/or safety of any National Primary or National Secondary Road shall include proposals to avoid, remedy or mitigate the impact on the National Road Network. Such proposals may include the payment of a contribution toward the cost of any required mitigation works.'

To amend Chapter **7.6.1, second paragraph** (omit text with strikethrough and include new text in red): 'Service areas may include parking for cars and heavy commercial vehicles; provision of food, fuel, toilet and shower facilities, play areas and convenience stores. With the transition to electric vehicles, service areas are becoming increasingly important as opportunities to recharge on longer distance journeys, and it is important that service users have access to other services such as waiting areas and Wi-Fi. To avoid a proliferation of service areas, and to ensure their long-term viability, the need for a coordinated approach may be required between planning authority areas and with reference to the national policy. **Monaghan County Council Planning Authority will engage in a coordinated approach with TII. Any plans or proposals will take cognisance of the policies set out in Section 2.8 of the DoECLG Spatial Planning and National Roads Guidelines.'**

To insert new **paragraph (6) at Chapter 15.22.7 Surface Water Drainage:** ‘Public road surface water drainage regimes are constructed with the objective of disposing of road surface water, it is important that capacity in the drainage regime is retained to address this function.’

To insert new policy **SWDP 2:** Development proposals shall ensure the capacity and efficiency of the public road network drainage regimes in County Monaghan will be safeguarded for road drainage purposes.

To amend Chapter **7.2 Paragraph 9, Paragraph 12** (additional text in red):

Paragraph 9

The following guidance documents published by the NTA 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, and
- Guidance Note on Area Based Transport Assessment (NTA and TII),
- TII publication standard DN-GEO-03084, The Treatment of Transition Zones to Towns and Villages on National Roads
- TII publication standard DN-GEO-03030, Design Phase Procedure for Road Safety Improvement Schemes, Urban Renewal Schemes and Local Improvement Schemes.

Paragraph 12

Proposals for development in urban areas including villages will be subject to the provisions contained within the Design Manual for Urban Roads and Street (DMURS). In exceptional circumstances, consultation with TII in respect of urban national roads may be required and complimentary requirements included in TII publications may be applicable.

To insert new policy (in red): **TP 11:** To ensure that new development proposals that are subject to Traffic and Transport Assessment are carried out in accordance with the requirements set out in the TII Traffic and Transport Assessment Guidelines.

To amend Chapter **15.26 Paragraph 3, point c** (new text in red):

- d) Incorporate aspects of TIIs technical acceptance and specification procedures for structures on the design and installation of the underpass including:
 - Technical Acceptance Report
 - TII publication DN-STR-03001 (Technical Acceptance of Road Structures on Motorways and Other National Roads)
 - Certification – Design, Check and Completion
 - TII Series 2500 Specification and Standard Construction Details, such as CC-SPW-02500 Specification for Road Works – Special Structures (2021)

To amend policy **LAUP 1:** (strikethrough to delete, new text in red): All access underpass development proposals shall comply with ~~Section 15.25~~ **Section 15.26** of the Monaghan County Development Plan 2025-2031.

To amend Chapter **10.7 Paragraph 4** (new text in red): ‘Recognising the strategically important parcel of zoned industry, enterprise and employment lands at Tullygrimes and Cornecassa Demesne, Monaghan County Council will facilitate and promote the sustainable development of these lands to consolidate, expand and complement existing significant enterprise activities at this location. The

Monaghan Land Use and Transportation Study (MLUTS) recommend the relocation of the 60 kph speed limit westwards on the N54. To facilitate this the following is required:

- The relocation of the 60kph speed limit zone 440m west of its existing location, and
- A new gateway to the west of Monaghan Town.

In recognising the strategically important parcel of zoned industry, enterprise and employment lands at Knockaconny, Monaghan County Council will facilitate and promote the sustainable development of the town as well as consolidating, expanding and complementing existing significant enterprise activities at this location.

Approximately 237 hectares of land has been zoned for industry, enterprise and employment in Monaghan Town as indicated on Map MDP 1 of the Monaghan County Development Plan 2025-2031. The provision of sufficient zoned industry, enterprise and employment lands will provide certainty and clarity for all potential developers and encourage the location of new industries in the town.'

To amend objective **CMO 8** (additional text in red): 'To protect, design and develop new road and road upgrade projects identified during the lifetime of this plan, subject to resources. Road schemes and Park & Ride schemes proposed and identified for development locally will be developed complementary to safeguarding the strategic function of the national road network. Proposals impacting on the national road network should be developed in consultation with and subject to the agreement of TII.'

To insert new text at Chapter **13.9 Paragraph 1** (in red): Recognising the strategically important parcel of zoned industry, enterprise and employment lands to the northeast of Clones adjoining the N54 national road where a 80km/h speed limit currently exists, Monaghan County Council will facilitate and promote the sustainable development of these lands to consolidate, expand and complement existing significant enterprise activities at this location. To facilitate this, the following will be considered and appropriate measures put in place-

- The N54 will be traffic calmed in accordance with TII Standards. This will include a review of speed limits and provision of infrastructure to compliment any traffic calming proposals.
- Any work regarding traffic calming shall be in accordance with TII Standards and Safety Audit requirements.
- Any proposals for traffic calming retrofitted onto existing pavements shall not compromise the structural integrity of the existing pavement. The installation of coloured surfaces that are trafficked shall comply with the requirements of TII Publication DN-PAV-03023 and CC-SPW-00900. All pavement works on the national road network shall comply with TII Specification for Roadworks CC-SPW-00900.
- The costs of implementation works, including any subsequent relocation of the speed limit and traffic calming, shall be a matter for the Council and/or applicant/developer as TII will not be responsible for funding or undertaking works for the benefit of private development interests.

Insert new policy (in red): **TP 12:** Road schemes proposed and identified for development locally will be developed complementary to safeguarding the strategic function of the national road network and proposals impacting on the national road network should be developed in consultation with and subject to the agreement of TII.

Insert new policy (in red): **TP 13:** Development proposals in proximity to the N2 junctions shall be appropriately assessed to ascertain the implications of traffic generation on the safe and efficient operation of the N2 and associated junctions. Proposals should consider the cumulative impact of development in the area and be subject to Traffic and Transport Assessment as appropriate.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
MN-C22-MCDP-50	Meath County Council	N/A	N/A

Summary of Submission & Issues Raised

- Welcomes the opportunity to comment on the Draft Monaghan County Development Plan 2025-2031.
- Share a short administrative boundary of approximately 5.8 km.
- This Council recognises the importance of collaboration with adjoining Local Authorities on environmental matters with cross-county dimension to many environmental issues such as energy, climate change, water quality, habitat and species loss.
- Cross-county co-operation is therefore vital to protect the environment across the two counties and the wider region. It is therefore considered necessary that there be a high level of consistency between County Plans in adjoining authorities. In this regard it is important that cognisance should be taken of the policies and objectives of the Meath County Development Plan 2021-2027 (as varied).

Meath County Council previously made a submission in July 2023 upon receiving notice of '*Intention to review the existing Monaghan County Development Plan 2019-2025 and to prepare a new Monaghan County Development Plan for 2025-2031*'. In the previous submission, comments were raised regarding social, cultural and economic development and the protection of the environment. This submission follows a similar format to the aforementioned submission.

The N2 Strategic Corridor

The N2 is a particularly important strategic route, which passes through County Meath linking the north of the island via Monaghan and Meath to Dublin. National Strategic Outcome 2 of the National Planning Framework (NPF) refers to enhanced regional accessibility. In Meath County Councils previous submission, it was suggested that a specific policy and supporting body text, similar to MOV OBJ 38 in the Meath County Development Plan 2021-2027 (as varied), be included in the Monaghan Development Plan.

From reviewing the Draft Plan, Meath County Council is content with the supporting body text included in Chapter 7 in relation to the N2 National Road. The Council also welcomes the following objectives: TO 1, TO 2 and TO 6, which aim to support, protect, improve and invest in national and regional routes to safeguard strategic transport links.

The Lakelands Greenway

The Boyne Valley to Lakelands Greenway is a 30km pedestrian and cyclist route along the old railway line from Navan in Co. Meath to Kingscourt in Co. Cavan and was completed earlier this year. Meath County Council has had initial consultations with Monaghan County Council regarding the possibility of extending the greenway ever further as far as Carrickmacross in County Monaghan following the old Great Northern Railway's Irish Northwest line. Meath County Council strongly welcomes objective CFO 18, and looks forward to working along with TII, Monaghan and Cavan County Council's in this existing project.

Landscape Character

The Meath County Development Plan 2021-2027 (as varied) contains a Landscape Character Assessment (LCA) which identifies the area adjacent to the Monaghan County boundary as the 'North Meath Lakelands Landscape Character Area' which is rated as being of a 'moderate value'. The Draft Monaghan County Development Plan identifies this area as 'Undulating Farmland'. The LCA describes this landscape as being low lying and has a smooth rolling topography. Meath County Council welcomes this landscape character, as well as objective HCLO 7, which seeks to ensure co-operation

with adjoining local authorities to ensure that the natural environment is maintained in a sustainable manner.

Nature Designations

Ballyhoe Lough Proposed Natural Heritage Area (Site Code 001594) is located on the Meath-Monaghan border. Chapter 8 'Cultural and Natural Heritage Strategy' of the Meath County Development Plan 2021 -2027 (as varied) lists all-Natural Heritage Areas and Proposed Natural Heritage Areas, including Ballyhoe Lough and contains a number of policies and objectives to protect such Natural Heritage Areas from inappropriate forms of development. Meath County Council welcomes the inclusion of objective HCLO 10 in the Draft Plan. The Council looks forward to continued co-operation.

In summary, Meath County Council welcomes and supports the policies and objectives contained within the Draft Monaghan County Development Plan 2025-2031 and looks forward to working with Monaghan County Council in the future.

Chief Executive Response

The comments put forward by Meath County Council are welcomed and this Council acknowledges the importance of collaboration and cross county co-operation in all of the issues raised by this Local Authority.

Chief Executive Recommendation

No amendments recommended.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
MN-C22-MCDP-64	Inland Fisheries Ireland (IFI)	N/A	N/A

Summary of Submission & Issues Raised

- Inland Fisheries Ireland (IFI) is a Statutory Body whose principal function is the protection, management and conservation of the inland fisheries resource. Protection of the aquatic environment and habitat is a vitally important element of IFI's work. The issues of water quality, fisheries habitat and angling tourism should be given due priority.
- “Fisheries” includes all inland fisheries recreational and commercial, sea angling and mollusc fisheries stipulated under the Fisheries Act, the physical habitat upon which the fishery relies, the facilities and access, the quantity and quality of the water and the plant and animal life on which fish depend for shelter and food and the spawning areas wherein fish deposit their eggs.
- The many rivers and lakes in County Monaghan contain valuable fisheries habitats, which support a wide variety of fish species from salmonids (Atlantic salmon and trout) to coarse fish and pike. It should be noted that while many of the river systems in the County are not designated under the Habitats Directive, they hold species that are designated under that directive, i.e. Atlantic salmon, sea, river and brook lamprey (listed as Annex II Species under the European Habitats Directive).
- These fisheries habitats contribute significantly to the natural heritage, amenity, recreational and tourism value of the County. The Development Plan provides the opportunity to protect the quality of the aquatic environment through policies addressing water quality, the physical environment, hydrological processes and biodiversity.

Having examined the proposed draft Plan and associated documents the following are observations from a fisheries perspective:

Chapter 4 Economy

Tourism Objectives: We welcome TMO 5 in particular, which supports the development of angling tourism initiatives in the County. Freshwater and marine recreational angling directly supports over 11,000 existing Irish jobs, many of which are located in the most peripheral and rural parts of the Irish countryside and along our coastline (IFI, 2015). IFI’s National Strategy for Angling Development (NSAD) 2015-2020 is the first comprehensive national framework for the development of our angling resource. The strategy aims to deliver a wide-ranging set of investments, innovations and promotions over the five years of the plan.

Chapter 7 Transport and Infrastructure

Provision of transport infrastructure should be planned and constructed in such a way as to protect and conserve the existing environment. Potential negative impacts of developments of this nature on aquatic habitats include impeding the passage of fish and other fauna and poor water quality. The impact of poorly designed river/stream crossing structures can be serious in terms of habitat loss and stream fragmentation. Prevention of the free passage of fish, e.g. salmon, trout and lamprey in particular can result in the loss of spawning habitat and impact on fish populations.

Chapter 8 Environment, Energy and Climate Change

Section 8.1 refers to Water Resources and Quality: The Development Plan is an opportunity to promote policies and awareness of water conservation which may ultimately result in a reduction in water use. Water conservation and water use efficiency are central elements of any strategy to enhance water supply reliability, restore ecosystems, and respond to climate change and changing demographics. Significant increases in water conservation and water use efficiency will be required to ensure reliable water supplies in the future. Best practice should be promoted in respect of water conservation in all

developments through methods such as rainwater harvesting. Another problem which is particular to summer months (when river/stream flows are often low) is wide scale unregulated water abstraction for crop irrigation. This practice may have significant ecological implications/impacts if large volumes of water are abstracted over a short period of time from small fish nursery or spawning streams. Such abstractions during dry weather or drought periods could have severe repercussions for aquatic habitats, fish stocks and accordingly the ecological status of watercourses in terms of the Water Framework Directive (WFD).

Water Protection Objectives:

We welcome WPO 5 to prevent river fragmentation and to encourage the connectivity or the re-connectivity where possible of fisheries waters and that IFI should be consulted on any such proposed developments.

We welcome WPO 6 and suggest the inclusion of the recently published Department of Housing, Local Government and Heritage guidance document '*Nature-based solutions for the management of rainwater and surface water run-off in urban areas*'. The document identifies the need for a significant change in the way to plan, design, build and maintain urban areas through the replacement of impermeable surfacing with nature-based planted areas designed to absorb, retain, store and treat urban runoff prior to discharge back to the environment. IFI would urge that both the public and private sectors would be encouraged to use this guidance from the earliest stages in the planning process. The aim of the guidance document is to reduce pollution and reduce flood risk as well as improving biodiversity and a greener more pleasant urban environment.

IFI welcomes WPO 8 regarding the inclusion of protection buffers in riverine and wetland areas. We recommend that the zone would be designed in accordance with IFI's guidance document '*Planning for watercourses in the urban environment*'. The immediate stream side zone should be minimum 10m wide to protect the river and vegetated with native riparian vegetation. The remainder of the riparian zone would prevent encroachment and would act as a sump/filter for nutrients and sediment. Incorporation of a suitably sized buffer zone can protect the aquatic habitat and can also provide an amenity and make space for high water flood events.

Chief Executive Response

The comments put forward by Inland Fisheries Ireland (IFI) are welcomed and the importance of this Statutory Body in its role in the protection of our rivers and aquatic environment and habitat is recognized.

In response to the guidance document referred to by IFI which was published by the Department of Housing, Local Government and Heritage, '*Nature-based solutions for the management of rainwater and surface water run-off in urban areas*'. This guidance document is referred to within the Draft Plan 2025-2031 and more specifically at Chapter 15 Section 15.22.7 Surface Water Drainage in which it states the following, '*All new developments in urban areas will be required to implement nature-based solutions in accordance with Nature Based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas (DHLGH, 2022), where appropriate*'. However, it is noted that IFI comments are specifically related to WPO 6. It is accepted that the inclusion of the referred to guidance document would provide further guidance in how to, plan, design, build and maintain urban areas through the replacement of impermeable surfacing with nature-based planted areas designed to absorb, retain, store and treat urban runoff prior to discharge back to the environment.

At objective WPO 8 regarding the request for the inclusion of IFI's guidance document '*Planning for watercourses in the urban environment*' (2020), The Draft Plan 2025-2031 at Chapter 15 titled Development Management references protection zones for rivers corridors. Section 15.22.6 titled

Water Protection it states, ‘Developments in the vicinity of waterbodies should include appropriate riparian protection corridors and in-stream works should be avoided. Where necessary, in stream works should be carried out under the guidance of Inland Fisheries Ireland (IFI) document ‘Requirements for the Protection of Fishery Habitat During Construction and Development Works at River Sites’.

As the guidance documents referred to by IFI provides further advice which would be helpful to members of the public, the following objectives WPO 6 and WPO 8 should be amended to include reference to and consideration given to these guidance documents.

Chief Executive Recommendation

It is recommended to include the following wording to the Draft Plan 2025-2031. In Chapter 8 Environment, Energy and Climate Change below Section 8.1.9 The Local Authorities Waters Programme, amend objectives WPO 4 and WPO 8 with the insertion of the following text indicated in red:

Water Protection Objectives	
WPO 6	To support the application and implementation of a catchment planning and management approach to development and conservation, including the implementation of Sustainable Drainage System techniques (SuDS) for new development, <i>with consideration given to the guidance document ‘Planning for watercourses in the urban environment’ published by the Department of Housing, Local Government and Heritage (2022).</i>
WPO 8	To protect waterbodies and watercourses from inappropriate development, including rivers, streams, associated undeveloped riparian strips, wetlands and natural floodplains. This will include protection buffers in riverine and wetland areas as appropriate, <i>with consideration given to Inland Fisheries Ireland’s guidance document ‘Planning for watercourses in the urban environment’ (2020).</i>

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-71</u>	National Environmental Health Service (NEHS) (HSE)	N/A	N/A

Summary of Submission & Issues Raised

The National Environmental Health Service has considered the draft Monaghan CDP 2025-2031 and made comments in the context of protecting and promoting population health in relation to strategic aims, housing, community, transport, infrastructure, environment, energy, and climate change.

Strategic Aims: The NEHS recommends that the final plan place greater emphasis on contributing to the vision of the Healthy Ireland Framework and integrating climate action to protect public health.

The strategic aims of the Monaghan County Development Plan focus on the proper planning and sustainable development of County Monaghan. A key challenge is integrating climate change considerations into strategic objectives. Ten strategic objectives are outlined, with SO 8 being closely aligned with health objectives, aiming "to plan for greater social inclusion and to improve the quality of life of all who live and work in County Monaghan." The NEHS recommends placing greater emphasis on protecting and promoting public health, contributing to the vision of the Healthy Ireland Framework, and recognizing the role of climate action in protecting public health and delivering opportunities for health co-benefit.

Housing: The NEHS suggests strengthening housing objectives to build healthy and resilient communities, considering the National Adaptation Framework 2024 and the National Planning Objective 54 under the National Planning Framework Ireland 2040.

The housing strategy objectives in the document focus on ensuring that the overall supply of housing meets the needs of the existing and projected population of County Monaghan. The strategy aims to provide more sustainable patterns of development. However, the NEHS recommends strengthening these objectives to explicitly include building healthy and resilient communities, considering the latest National Adaptation Framework 2024, Climate Resilient Ireland 2024 and aligning with the National Planning Objective 54 under the National Planning Framework Ireland 2040. This includes addressing the needs of vulnerable groups, such as older persons, to protect them from climate-related risks. And reducing carbon footprint by integrating into the planning system.

Community: The NEHS recommends that existing and future community facilities are assessed for their resilience to a range of potential hazards and that certain facilities are included as potential places (sports and education facilities for example) for housing of those displaced (locally/international).

Transport: The NEHS recommends including an assessment of existing human behaviour in relation to transport, the barriers currently preventing people from changing behaviour and what enabling factors will help deliver on the aim to minimise the need for travel and facilitate the modal shift desired. This will require that the plan provide balance to address 'hardware' (infrastructure) and 'software' (public communication and incentives to assist behavioural change) issues to facilitate the desired modal shift.

Infrastructure:

Water and wastewater - The NEHS recommend that the plan include mechanisms to deliver sustainable water supply other than solely via Uisce Eireann. The capturing of water from roofs etc.

Telecommunications – The NEHS recommends that the delivery of telecommunications is viewed as a useful tool in the protection and promotion of public health including as a vehicle for health education/promotion and a means for the delivery of an Early Warning System for health protection within the process of Emergency Management.

Environment, Energy, and Climate Change:

Chapter 8 includes the protection of water and air, the submission suggests that noise should be included.

Water resources and quality – NEHS recommends that the plan include the potential utilisation of manure and sludge for bioenergy as a means to minimise pollution risk to surface and ground water sources. Ref to bioenergy was noted in 8.2.7.

Energy - The NEHS recommends that the objectives set under this section include the protection of public health. Reducing Green House Gas emissions in itself protects health at a global level. Reducing the use of fossil fuels by investing in renewable energy reduces particulate and other pollutions more locally and protects public health.

Waste Management and the Circular Economy – NEHS recommends that the plan addresses waste elimination/minimisation first before waste collection and includes objectives/actions that for example minimise or eliminate the use of single use items, addresses the challenge of food waste. Addresses the challenge with regard to textiles, enabling communities to segregate waste in public places as well as domestically and support the right to repair.

Climate Action – recommends that health specific threats to public health are assessed (separately or within Climate Change Risk Assessment) or captured in the final plan and a management plan is developed to address those threats. Which may be e.g. severe weather events but also slow onset e.g. the gradual assessment of disease vectors capable of transmission in Co. Monaghan and beyond.

Climate Change – Integration of climate change into the CDP could be strengthened by expanding the lists of mitigation and adaption measures based upon assessments, that include threats to public health such as green infrastructure to provide shade in urban areas.

Flood Risk Management - The NEHS recommends that solutions proposed in the area of flooding and drainage are assessed for the potential effect from positive, negative, intended and unintended impact angles such as drainage systems that allow vectors of disease.

Light, Noise and Air Quality – That these are addressed from the perspective of protecting and promoting public health ref should be made to WHO Air Quality Guidelines, 2021 and the Irish Clean Air Strategy, 2023.

Sustainable Development Goals: Recommends that the plan align with the Governments National Implementations Plan for the Sustainable Development Goals 2022-2024. A key principle to deliver is the principle of ‘Leave No One Behind’.

Emergency Management/Disaster Risk Management including disaster Risk Reduction (DRR): That climate Change Risk Assessment proposed in other parts of this submission is conducted and that an Emergency Management Framework is developed utilising the Sendai Framework for Disaster Risk Reduction 2025-2031.

Monitoring and Evaluation including Health Impact Assessment: The NEHS recommends setting SMART indicators to measure performance and support an end-of-plan evaluation, including Health Impact Indicators to determine if quality of life and well-being have improved during the plan's lifetime. The plan should include the Health Impact Assessment to determine this.

Seeks Monaghan County Council to take this opportunity to incorporate the relevant health actions outlined below into the strategic planning of the spatial and built environment of the county, with the overall aim being to improve the health and wellbeing of the population of Monaghan.

Get Ireland Active – National Physical Activity Plan for Ireland

Strategic development of Monaghan County should include:

1. Opportunities for physical activity in the development of the built environment
2. All development should promote cycling and walking. A network of cycle routes and footpaths should be planned and developed which aim to promote connectivity of housing/employment to town centres, park and recreational amenities
3. Develop local and regional parks and recreational spaces that encourage physical activity.
4. Prioritise the planning and development of walking and cycling and general recreational/physical activity infrastructure.
5. Explore opportunities to maximise physical activity and recreation amenities in the natural environment.
6. A framework for workplace health and wellbeing, including physical activity should be developed. Any possible health gain for employees should be explored and developed.
7. The smarter travel workplaces initiative should be promoted. Sustainable or active modes of travel should be facilitated.
8. Ensure planning makes provision for recreational facilities for staff in industrial estates and ensures connectivity of work to park and recreational activities.
9. Support and develop 20 new walking groups in the County through funding of signage, upgrade of paths and lighting and resolving safety issues.
10. Developing a standardised framework for publicly funded programmes designed to increase physical activity levels. Use public money to leverage private funding to promote and develop physical activity and sport programmes.

Employment

It is essential that the planning of large-scale employment sites/industrial estates also takes into consideration the health and wellbeing of workers. A travel plan, which promotes and facilitates sustainable and active modes of travel, should be implemented for all these sites. There should be strong cycle and pedestrian links to town centres and to parks and/or recreational facilities to improve connectivity. There should be secure bike parking facilities provided and shower facilities for staff on site should also be considered. Recreational amenities that promote the health and wellbeing of employees on these sites should also be considered.

Tobacco Free Ireland

A strategic aim of the County Development Plan should be to:

- Implement the tobacco free playgrounds initiative.
- Promote tobacco free environments, parks, beaches, public campuses and grounds.
- With regard to the protection of people from second hand tobacco smoke all plans for development that include a designated smoking area should be forwarded to the Environmental Health Service prior to the planning decision.

Healthy Ireland - A Healthy Weight for Ireland

The environment in which we live impacts on the choices that we make and the County Council should create environments that make the healthy choice the easy choice:

1. Support community-based initiatives that develop programmes that support healthy lifestyles and prevention of obesity in children and adults.
2. Promote through planning and the built environment the benefits of healthy eating, physical activity and non-sedentary behaviour
3. Improve availability of and access to healthier food choices. Support developments that aim to improve the health of the population.

4. Support opportunities for increasing physical activity levels generally/ in the community through Local Sports Partnerships and supporting initiatives e.g. Parkrun.
5. Facilitate community gardens/allotments through identifying and releasing suitable publicly owned land.
6. It should be a strategic aim from the Development Plan to facilitate the production of more locally produced healthy, high-quality food.

Steering group report on a national substance misuse strategy.

The Strategic Development Plan for Monaghan should include:

1. A strategy to reduce and eliminate the reliance on alcohol sponsorship. Any public event or events on publicly owned lands or buildings should use alternatives to alcohol sponsorship.
2. Develop the provision of alcohol-free venues for young people, (e.g. Youth cafés, alcohol-free music and dance venues and sports venues) with:
 - The young people being centrally involved in the development and management of the programmes and venues;
 - Late night and weekend opening; and increased access to school facilities in out-of-school hours.

The National Positive Ageing Strategy

A strategic aim for the development plan should be to enable people as they age 'to get out and about' through the provision of accessible, affordable, and flexible transport systems in both rural and urban areas. This should include:

1. Provision of age-friendly public transport,
2. Promotion of the integration of the Rural Transport Programme with other local transport services,
3. Provision of public transport linkages to major health facilities and personal social services.
4. Supporting the design and development of age friendly public spaces, transport and buildings.
5. Designing age friendly urban environments (street lighting, footpaths, roads, public seating)
6. Promote access (in terms of affordability, transport availability, accessibility of venue) to a wide range of opportunities for continued learning and education for older people.
7. Promote the concept of active citizenship and the value of volunteering and encourage people of all ages to become more involved in and to contribute to their own communities.
8. Promote the development of opportunities for engagement and participation of people of all ages in a range of arts, cultural, spiritual, leisure, learning and physical activities in their local communities.

Suitable housing is a key aim in the National Positive Ageing Strategy and a key strategic aim of the Plan should be to:

1. Carry out an assessment of housing need and provision and consider all housing options in development (i.e. social housing, sheltered housing; retirement villages).
2. All residential development should incorporate the 'Universal Design' Principal to ensure housing can meet the needs of the occupants regardless of their age, size, ability or disability. This will also ensure that the houses provided will meet their changing needs over time so that people can continue living in their own homes and communities as they get older or become less able. This will also assist in implementing the Older People Remaining at Home (OPRAH) strategy.
3. Implement a strategy that facilitates older people to live in well-maintained, affordable, safe and secure homes, which are suitable to their physical and social needs. Development should incorporate the principals outlined in the 'Design Out Crime' Document.

Time to move on from congregated settings – A strategy for community inclusion

The Development Plan should:

1. Improve community inclusion of people with disabilities in their local community and community-based services.
2. Improve greater connectivity between generic community-based services and disability specific organisations. Facilitate their engagement as stakeholders.
3. Focus on meeting the housing and accommodation needs of people with disabilities through a combination of purchased housing, new-build housing, leased housing or rented housing. A local re-housing plan should be prepared and jointly co-ordinated with the HSE, in collaboration with service providers. The plan should be based on best practice in including people with disabilities in local communities and should facilitate dispersed housing with personal supports.
4. All residents in congregated settings should be assessed by the local authority to establish their eligibility and need for social housing support.
5. Consideration should be given to reserving a certain proportion of dwellings for people with disabilities.
6. Focus on supporting and sustaining people with disabilities to live in their own homes in the community through the provision of housing grants.
7. Support people with disabilities to access employment and education opportunities.
8. Support people with disabilities to access mainstream community services.

The Urban Design Manual – A Best Practice Guide

The Environmental Health Service recommends that any proposed housing/residential development is made up of a variety of household types, tenures and typologies, thereby creating a range of lifestyle, affordability and lifespan choices. This should ensure sustainable development with a diversity and mix of uses. The EHS also recommends that development proposals for large housing or urban areas should be accompanied by a Design Statement. It is hoped this will provide coherency and quality in design and also ensure compliance with all the objectives of the Development Plan.

Research 195: Health Benefits from Biodiversity and Green Infrastructure

It is recommended that all future developments in the County are examined for the opportunity to integrate green infrastructure into the design at planning stage. Any potential for health gain should be explored and incorporated into all development and the built environment. It is recommended that the following proposals are considered when planning for parks and recreational areas:

1. Green biodiverse spaces should be designed so that there is at least one within walkable distance from people's homes.
2. Green spaces should be co-designed with communities and reflect local needs.
3. Areas should be as large as possible with connections through flowery verges or linear habitats alongside paths and roads.
4. Areas should be relatively open, but grass does not all have to be the same length. This design could suggest careful, rather than a lack of, management. Interpretative signage can explain the practice and highlight signs of nature to look out for.
5. A few scattered trees or clumps of trees are preferable to dense planting of trees.
6. Paths, recreational areas and places to relax and engage with nature should be incorporated from the start, to promote use and maintain a feeling of safety. It is recommended all proposed green areas are provided with paths for walking.
7. Exercise areas, trails and paths need to provide maximum contact with green space, as this made exercise accessible, and nature contact motivated people to walk more.
8. Not all areas should be managed to the same intensity. Some parts near paths could be managed more to look tidy, whereas stakeholders recognised the value of incorporating wild areas, which could be further away from paths.

9. Biodiversity areas can be designed to accommodate playgrounds and other amenity areas.

Biodiversity & Green Areas

It should be a strategic aim of the Development Plan to bring biodiversity into the planning decision making process. A Biodiversity Action Plan should be developed which aims to conserve and restore biodiversity and ecosystem services in the wider countryside. Nature based solutions for the better management of urban problems should be explored and integrated into the design of public areas. Existing green areas should be preserved and utilised to their full capacity. The provision of pedestrian and cycle routes through green areas should be a key provision of the design. All towns and villages in the county should commit to a pollinator plan. It should be noted that the quality of green areas is key and the on-going need for maintenance should always be factored into any decisions at the design stage.

Transport

Whilst it is recognised that funding for large scale transport infrastructure is outside the control of Monaghan County it is recommended that the council identify small scale projects that can achieve significant gains i.e. segregated pedestrian & cycle paths to connect industrial estates to town centres, create cycle linkages between urban centres etc. A portion of the councils transport budget should be allocated to providing a comprehensive network of safe, well-lit footpaths and cycle lanes. This is essential to promote active travel and to provide connectivity of residential areas to schools, local neighbourhood centres, public transport stops and workplaces.

It is recommended that an audit be carried out of existing pedestrian and cycle facilities in the county to fully establish the existing infrastructure. It is also recommended that a programme of works is drawn up on a need's basis, to ensure that specific infrastructural works that improve connectivity will obtain funding. It is recommended an audit of the bus infrastructure is carried out and the council develop a priority list of necessary improvement works based on identified defects.

Smarter Travel Policy

The Development Plan should:

1. Set targets requiring a minimum percentage of new residential and mixed-use development to take place on brownfield/existing sites to consolidate urban growth and enable organic development of urban areas from the centre out. The National Planning framework strategy specifies that 30% of new housing must be delivered on infill/brownfield lands.
2. Specify a maximum permitted level of car parking for commercial sites, which have suitable public transport facilities and are within walking/cycling distance to amenities.
3. Set a general restriction of the future development of out-of-town retail centres except in exceptional circumstances and consideration of a similar requirement that parking charges be introduced for most existing centres.
4. Require developments above a certain scale to implement viable travel plans which promote public transport and modes of active travel and which reduce reliance on the car. All development should be required to show a route map showing safe cycling and walking routes to schools, shops and public transport.
5. Establish e-working centres to provide opportunities for people in rural areas and satellite towns to work from a location closer to home. This is of critical importance based on the current settlement patterns of the county.
6. Set a target that every school in Monaghan has a school travel plan to encourage students to take alternatives to the car. This should be supported with a strategic aim to develop safe walking and cycling routes to and from schools and other educational institutions as well as providing disability access.

7. Provide facilities such as secure bike parking and changing/showering facilities at places of employment in public authorities to encourage staff to cycle.

To support smarter travel there should be a strategic aim to:

1. Reprioritise traffic signals to favour pedestrians instead of vehicles, reducing waiting times and crossing distances at junctions.
2. Create level grade crossings for pedestrians across junctions. Create larger traffic-free areas in urban centre. Ensure that 30 km/h zones are designated in central urban areas which accommodate motorised traffic.
3. Widen footpaths where there are high pedestrian flows, particularly close to public transport nodes. Improve the surface quality of footpaths Provide appropriately designed safe, well-lit, direct, continuous facilities for pedestrians.
4. Ensure State-owned lands such as canal towpaths, former rail lines, Coillte estates, etc. are made available for the development of walking and cycling trails.
5. Support private and public sector initiatives to establish car club schemes in Ireland. Provide on-road parking spaces to be designated for car clubs through appropriate signage.
6. Establish Park and ride facilities along major public transport nodes, at the periphery of urban areas and at key public transport locations and nodes.

National Cycle Policy Framework

There is a need to improve the safety of cycling in County Monaghan and make it more attractive for users. The Strategic Development Plan should include the needs of cyclists, and in particular:

1. Implement measures to reduce the volumes of through-traffic, especially HGVs, in town centres and especially in the vicinity of schools and colleges.
2. Introduce traffic calming measures / enforce low traffic speeds in urban areas, make junctions safe for cyclists.
3. Support the provision of dedicated signed rural cycling networks building on Fáilte Ireland's Strategy to Develop Irish Cycling Tourism.
4. Segregate cycle paths if possible. Ensure that all surfaces used by cyclists are maintained to a high standard and are well lit and signposted.
5. Provide secure cycling parking at all destinations of importance to the cyclist and aim to integrate cycling and public transport and the provision of cycling parking at all appropriate public transport interchanges.

Ensure that the urban road infrastructure (with the exception of motorways) is designed / retrofitted so as to be cyclist-friendly. Link up all existing cycle lanes.

It is recommended that a 'quality audit' is carried out of pedestrian routes in towns and villages in the county, to ensure they are safe, well-lit and enticing for users. It is essential that attractive, safe and secure pedestrian walkways/cycleways are provided in order to influence behavioural change in the population and promote greater take up of active travel.

Waste

A Resource Opportunity – Waste Management Policy in Ireland

The Development Plan should implement the Waste Hierarchy set out in the Waste Framework Directive and place prevention and minimisation at the forefront of any waste policy.

1. Disposal of municipal waste to landfill should be a last resort.
2. Implement waste prevention measures with local business and community groups. Develop reduction strategies for plastic, food waste and resource use.
3. Include community waste prevention demonstration programmes, which provides skills to develop waste prevention within local communities.

4. The use of easily accessible public recycling bins should be considered for public areas, paths and green spaces that will allow for adequate waste segregation and will encourage the use of the waste management hierarchy.
5. A Reuse Policy should be developed in consultation with the national Procurement service and other relevant bodies and implemented within public bodies in Monaghan to ensure that full consideration is given to feasible reuse options before embarking on the purchase of new goods.

Water

The strategic aim of should be to ensure the provision of safe secure drinking water and promote the reduction in waste and overuse of water. To protect the ground water quality in the County there should be a strategic aim of ensuring all wastewater treatment plants can operate effectively with their current demand and future demand, and that private effluent treatment and domestic septic tanks are fit for their purpose.

Sustainable Development

In terms of climate change and land use planning the County Development Plan should play an important role in influencing a reduction in GHG emissions by guiding the sustainable growth of the County, encouraging more compact mixed-use development and greater use of sustainable transport options such as cycling, walking and public transport, restricting development in areas that are at risk of flooding and protecting the natural landscape and biodiversity.

A key aim of the previous Development Plan was to reduce energy consumption and greenhouse gas emissions and reduce the use of non-renewable resources. Progress reports on the council's achievements in this regard should be available. It is recommended that the County Council set specific targets for greenhouse gas reduction and outline achievable actions that seek to combat, reduce or eliminate the emissions of greenhouse gases. Key indicators for monitoring of progress on climate action must be outlined to ensure progress is achieved.

Monaghan County Council should ensure that climate considerations are fully integrated into the planning of new projects and their design. All future development within Monaghan should have a green procurement approach, which incorporates carbon pricing and climate criteria into decision making. It is recommended that all large-scale developments should document their climate action and energy efficiency proposals at the planning stage. It is also recommended that the County Council carries out a carbon audit of its existing building stock and retrofit with more insulated building fabric and sustainable technologies.

The Strategic Development Plan should include spatial planning policies to reduce the need for commuting to and from work. The creation of remote working hubs in rural towns and villages should be a priority and all new developments should have open access fibre connections.

The Development Plan should:

1. Promote and facilitate the incorporation of energy efficient design into projects.
2. Develop and implement an energy management programme for all public buildings.
3. Develop new key skill sets in areas such as green procurement, carbon accounting, carbon management and energy management.
4. Support and promote the Better Energy Communities Scheme to enable communities around the country develop new and innovative, locally based solutions to energy poverty.
5. The County Council should promote and optimise the use of renewable energy resource in the county. To avoid an over reliance on wind energy other renewable energy options such as solar, hydropower, wave & tidal energy, biomass and geothermal energy should all be explored and facilitated.

Environmental Noise

It is recommended that a Noise Impact Assessment is carried out for any development proposals with the potential to give rise to significant noise impacts. Also new developments must consider the impact of noise from existing noise sources. The EHS recommend that environmental noise should be considered in the context of:

1. New roads, railways, airports, industry or recreational activities adjacent to residential properties or noise sensitive premises such as schools or hospitals, or recreational spaces,
2. New residential properties or noise sensitive premises such as schools or hospitals, adjacent to existing roads, railways, airports, industry or recreational activities;
3. The development of mixed residential/commercial use buildings, and multipart Residential buildings;
4. Public house, night clubs, restaurants or other recreational activities; and
5. Industrial operations, workshops and factories.

Air Quality

The Strategic Development Plan should aim to reduce polluting emissions into air and increase the quality of air in the County by:

1. Participating in, and facilitating national programmes of air quality monitoring,
2. Working to develop and promote the Air Quality Index for Health,
3. Develop Local Air Quality Management Plans that identify pollution 'hot spots' and aim to reduce pollution through local action on emissions.

Implementation and Progress Evaluation

1. Efficient implementation of the County Development Plan into clear and effective action is of the utmost importance. It is strongly recommended that progress is constantly measured throughout the timeframe of the plan.
2. The council should develop and publish specific measures or performance indicators which establish how progress is quantified and measured.
3. An evaluation of the delivery of all key aims should be carried out and Monaghan County Council should highlight and promote areas where progress is being made and should also examine areas where less was achieved and investigate the reasons why. Any barriers to implementation of the key aims should be identified.

Chief Executive Response

The Council welcomes and notes the comments put forward by the National Environmental Health Service (NEHS). Monaghan County Council recognises the integral nature that land use planning has in relation to the health and wellbeing of the population of Monaghan.

Notwithstanding this in relation to the issues raised it is noted that there are several which fall outside of the remit of planning such as Tobacco Free Ireland, the Steering group report on a national substance misuse strategy and Healthy Ireland - A Healthy Weight for Ireland.

In response to some of the points raised:

- In respect of retrofitting - Objective CAO 12 promotes the retrofitting of existing building stock, and the Housing Section of the Council are undertaking a programme of retrofitting of social housing in the County along with Council owned buildings.
- Brownfield development is addressed in the Core Strategy and accords with national guidance -in addition the Development Plan seeks to promote sustainable compact development forms including infill sites. Section 15.2.3 of the Plan specifically deals with infill development in towns and villages.

- Section 3.17.7 of the Development Plan acknowledges that there is a demand for accessible private housing for older people and/or people with disabilities and that a measure is required to encourage the provision of accessible housing within the private market. This Section also notes that housing should be designed to be flexible to accommodate the changing needs of the groups, families and individuals who occupy them over the lifetime of a house. Additionally, the Development Plan recognises that the needs of occupants will vary as individual circumstances change and states that lifetime housing should be fully accessible and easily adaptable at minimum cost and minimum disruption. Crucially, the Development Plan clearly states that the principles of universal, inclusion, barrier free design should be demonstratively applied where possible and notes that the development of flexible housing design will be supported. It is therefore considered that the following objectives HSO 9, HSO 10 AND HSO 12 encourage the provision of housing which is accessible for all ages and abilities.
- Section 15.2.13 of the Development Plan deals specifically with Access for All and states 'The refurbishment of existing buildings or proposals for new development, particularly those intended for public use, must be designed in accordance with the standards outlined in the National Disability Authority – Building for Everyone; A Universal Design Approach (2012) (or any new or updated/subsequent versions) and in compliance with Part M of the Building Regulations'.
- Chapter 5 Community addresses community facilities supported by the strategic goal CFSO 1. Section 5.3 Community facilities acknowledge the importance that community facilities play in a fostering a sense of community identify and well-being.
- Noting the comments to support modal shift, and the behaviours which can addresses/support this change, the Council is committed to active travel, cycling infrastructure and modal shifts and this is supported by the timeframes placed on sustainable mobility plans and local transport plans identified in the OPR response MN-C22-MCDP-126.
- Bioenergy is referred to in Chapter 8 at Section 8.2.7, further wording and objectives have been added to support this. As detailed in the recommendation relating to submission MN-C22-MCDP-123.
- The comments in respect of sustainable water, food supply, waste, energy are noted. The tables within Chapter 8, identified as 8.8 and 8.9 Climate mitigation and adaption measures, acknowledge the importance of these in respect of climate change. These are supported by the Climate Action objectives CAO 1-15.
- The comments regarding Flood Risk are noted. This is addressed via objectives FRMO 1-4 and further objectives which have been recommended to be added in response to the Office of the Public Works submission MN-C22-MCDP-84 and the OPR response MN-C22-MCDP-126.
- The Council has adopted an extensive Climate Action Plan which is integrated into this draft CDP. The Council are currently preparing a Biodiversity Action Plan. Chapter 15 Development Management Standards set out green space requirements.
- In respect of implementation and progress, the OPR response MN-C22-MCDP-126, provides further details on monitoring and review.

This Council fully endorses national and local policies which aim to promote and support climate change, sustainable development, modal shifts, active travel, cycling infrastructure and smarter transport, infrastructure development, protection of our biodiversity and green areas, renewable energy and environment, waste management and the need for a variety of housing types. The Council is committed to working with relevant agencies, communities and individuals to ensure a healthy environment for those that live and work within the County.

Chief Executive Recommendation

No amendments recommended.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-84</u>	Office of the Public Works (OPW)	N/A	N/A

Summary of submission

- The OPW, as lead agency for flood risk management in Ireland, welcomes the opportunity to comment on the Draft Monaghan County Development Plan for the period 2025 – 2031.
- This submission is made specifically concerning flood risk management. Further submissions on the draft plan may be made by the OPW concerning the estate portfolio, heritage and other areas of responsibility.
- The OPW welcomes the acknowledgement of the Guidelines and the preparation of a Strategic Flood Risk Assessment (SFRA). In particular, the OPW welcomes policy objective FRMO1, to fully implement and support the provisions of the EU Floods Directive, the Flood Risk Regulations, and the Guidelines.

The following comments highlight opportunities for the Draft Plan before it is finalised.

Flood Zone Mapping

It is difficult to assess whether the sequential approach has been followed without the inclusion of flood zone mapping overlaid on lands use zoning mapping at consultation stage.

Mapping Datasets

Table 4.1: ‘Sources of Primary Flood Information Summary’ in the SFRA notes that PFRA mapping has been used for Flood Zone Mapping. It is stated in section 4.2.1 of the SFRA that “*PFRA fluvial indicative flood mapping remains the best and only available flood data where no CFRAM NIFM or MCDP flood data exists for a number of watercourses across the County*” As acknowledged in section 4.2.1 of the SFRA, the data is considered superseded, and as such should no longer be used. The PFRA indicative flood maps, provided to the local authorities in 2012, were indicative, and were developed using proprietary GIS techniques, rather than more sophisticated computational hydraulic models or river channel surveys. Where flood risk has been identified within a settlement and no valid OPW datasets are available, Monaghan County Council may consider carrying out their own assessment. Any available data such as the outputs of any site-specific flood risk assessments accepted by Monaghan County Council might be considered.

Section 4.2.4 of the SFRA notes with regard to the use of NIFM data that “*Flood outlines are suitable for use in the Stage 1 Flood Risk Assessment and initial Flood Zone mapping but not suitable for use in site specific flood risk assessment. Where a land zoning allocation is being considered within or adjacent to an initial Flood Zone defined by NIFM flood extents then additional data / information source will be required to form the basis of a Stage 2 Flood Risk Assessment*”. As set out in OPW guidance on the use of NIFM data, NIFM mapping only provides an indication of areas that may be prone to flooding. They are not necessarily locally accurate and should not be used as the sole basis for defining the Flood Zones. Where NIFM extents have been used to define Flood Zones, Monaghan County Council might provide further detail regarding how these extents have been confirmed.

Flood Risk Infrastructure

Table 4.4: ‘Stage 1 Flood Risk Assessment Summary’ notes regarding risk due to flood defence failure that “*There are no recorded flood defences benefitting lands in parts of Monaghan*”. It is noted that various minor flood mitigation works projects funded by the OPW have been completed in Monaghan. In addition, justification test BBFRA7 references flood defence measures constructed in Ballybay. Monaghan County Council might consider including a register of key flood risk infrastructure in the

County Development Plan where it would not otherwise be readily identified or protected from interference or removal.

Consideration of Climate Change

The OPW welcomes the discussion on climate change in section 3.8 of the SFRA, in particular the discussion on:

- Adopting a cautionary approach to zoning land in transitional areas,
- Ensuring the finished levels of structures designed to protect against flooding are sufficient to cope with the effects of climate change,
- Ensuring development and flood protection structures are capable of adaptation to the effects of climate change

The minimum design level requirements for fluvial flooding set out in Table 6.4 of the SFRA are welcomed, it might be beneficial if this were supported by a policy objective.

It is stated in both section 6.5.1 and 7.2 of the SFRA that *"The OPW is currently transitioning to regional based climate models that reflect the likely varied impacts throughout the island of Ireland. This is likely to be implemented during the lifetime of the county development plan"*. The OPW are not in the process of transitioning to regional based climate models, and the guidance in the 2019 Flood Risk Management Climate Change Sectoral Adaptation Plan is still applicable.

Figure 15.1

Figure 15.1 in the written statement indicates that less vulnerable development is inappropriate in Flood Zone B due to climate change. This is not consistent with either table 3.7, or table 6.1 of the SFRA.

Flood Relief Schemes

Section 8.7 of the written statement notes that flood risk management plans have been produced for Monaghan Town, Inishkeen, and Ballybay, setting out recommendations for works that will alleviate the flood risk in these settlements. The OPW requests that Monaghan County Council have full regard to the development of these schemes. Monaghan County Council might consider the inclusion of specific objectives in this regard in the County Development Plan, to ensure that zoning or development proposals support and do not impede or prevent the progression of these schemes.

Site Specific Flood Risk Assessments

Section 8.7 of the written statement notes that *"The SFRA identifies and maps the locations that flooding is most likely to occur within the Tier 1, 2, 3 and 4 settlements of County Monaghan. Therein flood risk is categorised under two strands - Flood Risk A and Flood Risk B. Any development proposals located in such areas shall be required to prepare a site-specific Flood Risk Assessment in accordance with the methodology set out in 'The Planning System and Flood Risk Management - Guidelines for Planning Authorities'."* The OPW welcomes this requirement. It might be beneficial if this were supported by a policy objective.

Construction, Replacement or Alteration of Bridges and Culverts over Watercourses

Chapter 7 of the draft plan contains discussion on potential transport projects. It should be noted that there are restrictions on the construction, replacement or alteration of bridges and culverts over any watercourse, and that appropriate consent from the Commissioners is required under Section 50 of the Arterial Drainage Act 1945.

Errata

Section 5.3.2 of the SFRA notes that *"In line with the OPW Guidelines, 'inappropriate' land use zonings are: Highly vulnerable uses in Flood Zone A and Flood Zone B, less vulnerable uses in Flood Zone B.*

Monaghan County council might clarify if this should read “Highly vulnerable uses in Flood zone B, noting that as set out above, this would not be consistent with Figure 15.1 of the written statement.

Sustainable Drainage Systems (SuDS)

The OPW welcomes policy SWDP 1 requiring provision for SuDS inclusion in development proposals, and objective SWDO 1 promoting and encouraging the use of SuDS and Green-Blue Infrastructure in new developments.

The Guidelines recommend that the SFRA provide guidance on the likely applicability of different SuDS techniques for managing surface water run-off at key development sites.

The Guidelines also recommend that the SFRA identifies where integrated and area-based provision of SuDS and green infrastructure are appropriate in order to avoid reliance on individual site by site solutions.

Justification Tests

The OPW welcomes the provision of plan making justification tests in the draft plan. It is noted however, that no conclusion has been provided as to whether justification tests have been satisfied, and there are a number of cases where not all criteria of the plan making justification test have been shown to have been satisfied.

Each criterion of the Plan Making Justification Test must be satisfied for an exception to the sequential approach to be considered justified. If any criteria have not been satisfied, the justification test has not been passed. If in this case the lands are undeveloped, then following the sequential approach substitution should be used to rezone the lands for usage appropriate to the assessed level of flood risk. If the lands are already developed and it is considered appropriate to retain the zoning to reflect current usage, restrictions should be incorporated to ensure further infill development does not introduce people or property to flood risk areas. If there is extant planning permission, restrictions might be incorporated to restrict potential development to that for which permission has already been granted, and should the planning permission lapse, consideration might be given to rezoning the lands for usage appropriate to the level of flood risk identified.

For a number of included justification tests, the following has been found:

- No text has been included to demonstrate how zonings are **essential** to facilitate regeneration and/or expansion of the centre of the urban settlement. If zoned lands are not essential to facilitate regeneration and/or expansion of the urban core, criterion 2(i) of the justification test has not been satisfied.
- Several sites have been described as being “*within the built-up footprint of the settlement*”. Please note that the Justification Test applies only to the urban centre (i.e., the core area of a city, town or village which acts as a centre for a broad range of employment, retail, community, residential and transport functions), and would not be applicable to the periphery of urban areas. If lands being assessed are not located within an area that satisfies the above description, or adjoining such lands, part 2(iii) of the justification test has not been satisfied.
- It has been stated that there is no requirement to identify suitable alternative lands. where the following applies:
 - There is extant planning permission,
 - “*Having regard to the established use of the lands*”,
 - “*Having regard to the long-established development/use on the adjoining lands*” or
 - “*Having regard to the limited extent of flood risk area on the lands*”.

If there are suitable alternative lands for the particular development type at lower risk of flooding within or adjoining the core of the urban settlement, regardless of the extent of flood risk area, established use in the subject or adjacent lands, or extant planning permission, criterion 2(v) of the justification test has not been satisfied.

Part 3 of the Plan Making Justification Test as set out in the Guidelines is that “*A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process, which demonstrates that flood risk to the development can be adequately managed, and the use or development of the lands will not cause unacceptable adverse impacts elsewhere*”. This is a requirement that in order to satisfy the Justification Test, it must be demonstrated that it is feasible to develop the lands in question safely. Any requirements, mitigations or limitations required to ensure the lands can be safely developed should be included and transposed into the draft plan as policy objectives, and this should **not** be passed on to development management.

For sites that are intended to be zoned for development following the application of a Justification Test where only a small proportion of the site is at risk of flooding, a policy objective might be attached to such zoning. Such an objective might require that the sequential approach be applied in the site planning, whereby to ensure no encroachment onto, or loss of the flood plain, or that only water compatible development such as *Open Space* would be permitted for the lands which are identified as being at risk of flooding within that site. Planning permission for these sites might then be subject to the sequential approach having been adopted and applied as above, following a detailed FRA.

Comments on Specific Areas

Ballybay

- There are areas within the settlement where the flood extent limits provided are not consistent with CFRAM extents. No commentary has been included in the draft plan to support the assessment that CFRAM has overestimated the flood risk in this settlement. If Monaghan County Council has evidence that the flood risk in this settlement is overestimated, consideration might be given to submission of a flood map review request in order that this be fully assessed. A flood map review request form and guidance on the flood map review programme can be found on www.floodinfo.ie under the ‘Resources’ dropdown.
- It is stated in justification test BBFRA 15 that “*having regard to the previous use and structures on these lands*”, there is no requirement to identify suitable alternative lands for this zoning. As these lands have been previously in use as a garden centre and the proposed usage is Residential, the vulnerability of this usage would increase with the proposed zoning, which has the potential to introduce inappropriate development to a flood risk area. This would not be appropriate unless it can be demonstrated all criteria of the plan making justification test have been satisfied.
- Justification test BBFRA 23 refers to Community Services / Facilities zoned lands, currently in use as playing fields. The current usage is water compatible; however the zoning objective has the potential permit highly vulnerable usage such as schools, which are not appropriate in Flood Zones A or B. Monaghan County Council might consider an objective to limit usage in Flood Risk areas to that appropriate to the level of flood risk.

Carrickmacross

- The area of land discussed in justification test CMFRA 1 is not shown as at risk in any OPW dataset. Further detail might be provided on the nature of the risk at this location.
- Justification test CMFRA 20 notes that “*having regard to the established use of the lands*”, there is no requirement to identify suitable alternative lands. There would appear to be

potential for infill development on these lands. Monaghan County Council might consider measures to limit the introduction of development inappropriate to the level of flood risk.

Castleblaney

- Justification Test CBFRA 2 notes that *“having regard to the central location of the affected lands and the established use of the surrounding lands there is no requirement to identify suitable alternative lands for the particular use or development type”*. These lands are located on the northern periphery of the settlement. In addition, flood zone extents for these lands have been delineated using the 2017 MCC SFRA dataset. As these lands are located outside the extents indicated by OPW datasets, and are not located adjacent to a watercourse, further detail might be provided on the nature of the risk at this location, noting that Flood Zones represent flooding from fluvial and coastal sources only.

Clones

- It is stated in justification test CSFRA 4 that *“having regard to the existing developed nature of the affected lands and the established use of the surrounding lands”*, there is no requirement to identify suitable alternative lands for this zoning. As these lands have been previously in agricultural use which is classified as less vulnerable in the Guidelines, and the proposed use is highly vulnerable Strategic Residential Reserve, the vulnerability of this usage would increase with the proposed zoning, which has the potential to introduce inappropriate development to a flood risk area. This would not be appropriate unless it can be demonstrated all criteria have the plan making justification test have been satisfied.

Monaghan Town

- Justification test MTFRA 7 notes that *“As the affected lands are on the margins of the lands, the affected lands could be used for buffer landscaping or same level parking/servicing yard if developed”*. A significant proportion of the zoned area is located within CFRAM extents.
- Justification test MTFRA 26 note that *“having regard to the long-established development/use on the adjoining lands there is no requirement to identify suitable alternative lands for the particular use or development type”*. These lands constitute undeveloped lands on the periphery of the settlement.
- Justification test MTFRA 48 notes that *“As the affected lands are on the margins of the lands, the affected lands could be used for buffer landscaping or same level parking/servicing yard if developed”*. A significant proportion of the zoned area is located within CFRAM extents.
- Justification test MTFRA 50 notes that *“having regard to the long-established development/use on the adjoining lands there is no requirement to identify suitable alternative lands for the particular use or development type”*. These lands constitute undeveloped lands on the periphery of the settlement. In addition, these lands are located outside CFRAM extents. Further detail might be provided on the nature of the risk at this location.

Chief Executive Response

The comments submitted by OPW are noted and the points/recommendations raised by the OPW are addressed as follows.

It should be stated from the outset that the SFRA has been reviewed/revised and as per the recommendation put forward the Flood Zones have been revised to include only areas associated with OPW CFRAM and NIFM data (whereby NIFM data has been subject to checking / review by Monaghan CC staff to confirm the extents shown are consistent with local knowledge). Historical MCC data is retained for information and advisory purposes but does not form part of the defined Flood Zones. This is reflected in the amended maps set out in the revised SFRA attached to this document.

To note - the green 'Flood Risk Areas' previously illustrated on the Draft CDP zoning maps 2025-2031 have been removed. The revised Flood Zones are contained in the revised SFRA and have been overlaid onto the zoning maps for the CDP 2025-2031, as per the recommendation.

Flood Zone Mapping

To note that the revised SFRA, no longer shows the green 'Flood Risk Areas', this has been removed. The JT section only refers to lands which falls within the revised Flood Zones. The revised SFRA is attached to this Chief Executive report the JTs have been reworked by the Councils SFRA consultants and maps now include the Flood Zones and land use zonings.

Mapping Datasets

To note the following changes to the SFRA:

- Flood Zone Maps (100 series) have been amended to be based on OPW CFRAM and NIFM data only. As a result, the County wide Flood Zone Maps will be dropped (i.e. new maps will cover settlements only).
- Data Source (200 series), have been updated similarly (i.e. showing OPW CFRAM and NIFM data only).
- A new set of "Flood Risk Information" maps have been produced. These show the Flood Zones (as defined above) but also the previous Monaghan SFRA flood data.
- Text within the SFRA report will state that these 'Flood Risk Information' maps are based on a wide variety of sources, of variable confidence, do not constitute Flood Zones, but are provided as additional data to inform future assessments.

Flood Risk Infrastructure

The SFRA notes "There are no completed or ongoing OPW flood defence schemes in County Monaghan. There are a number of OPW 'Minor Works' schemes across the County which can be viewed / accessed via floodinfo.ie. This database will be updated throughout the lifetime of the County Development Plan." During the data collection phase, it was requested to collect data on any flood defences in the county. Section 4.3.4 refers to the OPW register of Minor Works Schemes, which is continually updated and maintained, and encompasses the flood defence measures constructed in Ballybay. Outside of the Minor Works database available through floodinfo.ie, MCC does not currently maintains a register of key flood risk infrastructure, and we are in agreement that this would be of value. Going forward this data should be recorded.

Consideration of Climate Change

The minimum design level requirements for fluvial flooding are set out in Table 6.4 of the SFRA. To supplement this a policy objective will be added to the revised SFRA and is set out below.

It is stated in both section 6.5.1 and 7.2 of the SFRA that "*The OPW is currently transitioning to regional based climate models that reflect the likely varied impacts throughout the island of Ireland. This is likely to be implemented during the lifetime of the county development plan*". The OPW are not in the process of transitioning to regional based climate models, and the guidance in the 2019 Flood Risk Management Climate Change Sectoral Adaptation Plan is still applicable. Noted. Reference to the regional based climate models has been removed from the SFRA and replaced with 2019 guidance as the prevailing source for climate change information.

Figure 15.1 - Figure 15.1 of the draft CDP has been revised to coincide with the SFRA. As set out below.

Flood Relief Schemes - It is agreed that additional specific policy relating to this will be included within the draft CDP. See objectives outlined below.

Site Specific Flood Risk Assessment – Specific objectives should be added to the draft CDP. See recommended objectives outlined below.

Construction, Replacement or Alteration of Bridges and Culverts over Watercourses - Section 50 requirements should be added to the revised SFRA.

Errata – Figure 15.1 has been replaced (See below) and is now consistent with Section 5.3.2 of the SFRA.

Sustainable Drainage Systems (SuDS)

The Guidelines recommend that the SFRA provide guidance on the likely applicability of different SuDS techniques for managing surface water run-off at key development sites. The Guidelines also recommend that the SFRA identifies where integrated, and area-based provision of SuDS and green infrastructure are appropriate in order to avoid reliance on individual site by site solutions. It is accepted that a further objective should be added to address this.

Justification Tests

To note any justification test that does not pertain to the revised Flood Zones has been removed. The green 'Flood Risk Areas' are recommended to be removed from the draft zoning maps 2025-2031.

The additional flood risk data which was obtained by MCC which was set out in the 2019 CDP SFRA was based on PFRA, local knowledge and historical data. It is acknowledged that this data is not based on the current CFRAM and NIFM data by OPW, nonetheless it provides useful information and continues to be an important data set. Therefore, it is agreed that the SFRA will compile additional flood risk maps showing historical data from MCC these will be included for information purposes. Any highly vulnerable or less vulnerable uses that are proposed within these areas will require the applicant to fill out a flood risk appraisal pro forma, as set out in the revised SFRA.

The revised SFRA has included conclusions where justification tests have been satisfied. As such each Plan Making Justification Test applied has been satisfied for an exception to the sequential approach to be considered justified. If in this case the lands are undeveloped, then following the sequential approach substitution these lands have been rezoned for usage appropriate to the assessed level of flood risk. In the case where the lands are already developed and it has been considered appropriate to retain the zoning to reflect current usage, restrictions have been incorporated to ensure further infill development does not introduce people or property to flood risk areas. In the event where there is extant planning permission, restrictions might be incorporated to restrict potential development to that for which permission has already been granted, and should the planning permission lapse, consideration might be given to rezoning the lands for usage appropriate to the level of flood risk identified.

The following text should be added to justification tests, where the following has been found:

- These zonings are essential to facilitate regeneration and/or expansion of the centre of the urban settlement.
- Several sites have been described as being “*within the built-up footprint of the settlement*”. Please note that the Justification Test applies only to the urban centre (i.e., the core area of a city, town or village which acts as a centre for a broad range of employment, retail, community, residential and transport functions), and would not be applicable to the periphery of urban areas. If lands being assessed are not located within an area that satisfies the above description, or adjoining such lands, part 2(iii) of the justification test has not been satisfied.
- It has been stated that there is no requirement to identify suitable alternative lands. where the following applies:

- There is extant planning permission,
- “having regard to the established use of the lands”,
- “having regard to the long established development/use on the adjoining lands” or
- “having regard to the limited extent of flood risk area on the lands”

Policy objectives have been recommended below, and these encompass the findings of the JTs to ensure compliance and appropriate development.

Specific Areas

Flood Zone extents were previously based upon the CFRAM, NIFM, PFRA and historical MCC data. These extents have been revised and the justification tests previously prepared may not be applicable in some instances. There is no CFRAM and NIFM mapping data for the land use zoning within the settlements of Clones and therefore those justification tests have been removed.

Ballybay –

- BBFRA 15 is now referred to as BB465 in the SFRA revision. The area which falls within the revised Flood Zones has now been altered to a water compatible use.
- BBFRA 23 is now referred to as BB434 in the SFRA revision. The area which falls within the revised Flood Zone has now been altered to a water compatible use.

Carrickmacross –

- CFRMA 1 as this land does not fall within the revised Flood Zones this justification test has been removed.
- CMFRA 20 is now referred to as CM658 this parcel of ground has an existing use. Therefore, any further development proposals on the site will require a justification test as it is likely to subject to flood risk or have the potential to offset flooding elsewhere.

Castleblayney –

- CBFRA 2 does not fall within the revised Flood Zones, and the justification test has been removed from the revised SFRA.

Monaghan –

- MTFRA 7 is now referred to as MT313 and the wording within the justification test criteria 2 will be altered. See below.
- MTFRA 26 has been removed from the industrial land use zoning and the settlement boundary moved inward to exclude the parcel of ground subject to flood risk.
- MTFRA 48 is now referred to as MT354 and the wording within the justification test criteria 2 will be altered. See below.
- MTFRA 50 justification test has been removed as these lands are located outside the revised Flood Zones.

Chief Executive Recommendation

The following changes are recommended:

1. A revised SFRA should be compiled. Any justification test that does not pertain to the revised Flood Zones should be removed. The green ‘Flood Risk Areas’ as illustrated on the previous draft zoning maps 2025-2031 should be removed.
2. Below table 6.4 of the revised SFRA, it is recommended that the following objective should be included which supports minimum design level requirements for fluvial flooding, it should read as follows.

Due to the varying sensitivity of development, freeboard is to be applied based on the classification of receptor vulnerability. If achieving freeboard requires raising of ground levels within a floodplain, then the requirement for Floodplain Compensatory Storage as outlined in Section 6.5.5 of the Monaghan CDP SFRA must be considered. Minimum freeboard requirements when the maximum design flood level is fluvial are as set out in Table 6.4 Monaghan CDP SFRA.

3. At Chapter 15 Development Management, Section 15.22.8 Flood Zones and Appropriate Uses, it is recommended to replace Figure 15.1: Appropriate Land Uses in Flood Zones below:

Flood Zones	Overall probability	Planning Implications for land uses		
		Highly Vulnerable Development	Less Vulnerable Development	Water Compatible Development
Flood Zone A	Highest	Inappropriate – if proposed then Justification Test and detailed Flood Risk Assessment is required	Inappropriate – if proposed then Justification Test and detailed Flood Risk Assessment is required	Appropriate – screen for flood risk
Flood zone B	Moderate	Inappropriate – if proposed then Justification Test and detailed Flood Risk Assessment is required	Inappropriate due to climate change – if proposed then Justification Test and detailed Flood Risk Assessment is required	Appropriate – screen for flood risk
Flood Zone C	Lowest	Appropriate - detailed Flood Risk Assessment may be required	Appropriate - detailed Flood Risk Assessment may be required	Appropriate – screen for flood risk

The above Figure 15.1 should be replaced with the following:

Figure 15.1 Matrix of vulnerability versus flood zone to illustrate appropriate development and that required to meet the Justification Test.

	Flood Zone A	Flood Zone B	Flood Zone C
Highly vulnerable development (including essential infrastructure)	Justification Test	Justification Test	Appropriate
Less vulnerable development	Justification Test	Appropriate	Appropriate
Water-compatible development	Appropriate	Appropriate	Appropriate

Source: Table 3.2 of The Planning System and Flood Risk Management – Guidelines for Planning Authorities (Nov 09).

- Flood Relief Schemes – it is recommended that objective FRMO 5 outlined below is added to the CDP.
- Site Specific Flood Risk Assessment – it is recommended that the following policies FRMO 1, 2, 3, and 4 outlined below should be added.
- It is recommended that Section 50 requirements should be added to the revised SFRA.
- Sustainable Drainage Systems (SuDS) it is recommended that the following objective SWDO 2 outlined below should be added.

8. At Chapter 8 Environment, Energy and Climate Change, Section 8.7 Flood Risk Management it is recommended that the following objectives and policies should be added:

Flood Risk Management Objectives	
FRMO 5	To support the development of long and short-term flood remediation works and flood relief schemes throughout the County subject to environmental considerations, ensuring that development proposals support and do not impede or prevent the progression of these schemes.

Flood Risk Management Policies	
FRMP 1	Applications for development, as required on previously developed lands within Flood Zones A or B, shall be subject to site specific flood risk assessment and shall provide details of structural and non-structural flood risk management measures, such as those relating to floor levels, internal layout, flood-resistant construction, flood-resilient construction, emergency response planning and access and egress during flood events.
FRMP 2	Where a Justification Test applies, it must be demonstrated to the satisfaction of the planning authority that the flood risk can be adequately managed, and that the use and the development of the lands will not cause unacceptable impacts elsewhere.
FRMP 3	Extensions of existing uses or minor development within flood risk areas will be supported, provided they do not: obstruct important flow paths; introduce a number of people into flood risk areas; entail the storage of hazardous substances; have adverse impacts or impede access to a watercourse, floodplain or flood protection and management facilities; or increase the risk of flooding elsewhere.
FRMP 4	Where only a small proportion of a site is at risk of flooding, the sequential approach shall be applied in site planning, in order to seek to ensure that no encroachment onto or loss of the flood plain occurs and/or that only water compatible development such as Open Space would be permitted for the lands which are identified as being at risk of flooding within that site.

9. At Chapter 8 Environment, Energy and Climate Change, Section 8.8 Surface Water Drainage it is recommended that the following objective will be added:

Surface Water Drainage Objectives	
SWDO 2	All development proposals, as required shall carry out a surface water and drainage assessment and shall be compliant with the following to ensure that drainage from the site is managed sustainably: <ul style="list-style-type: none"> • Department of Housing, Local Government and Heritage (DHLGH) ‘Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas – Water Sensitive Urban Design’ (March 2022) • CIRIA SuDS Manual C753 (2015) • It is noted that updates to the above documents and / or new published documents during the lifetime of the SFRA are to be implemented as part of Development Management where appropriate.

Specific area recommendations

Monaghan –The following insertions and deletions are recommended.

- MTFRA 7 is now referred to as MT313 and the wording within the justification test criteria 2 will be altered with the inclusion of the text in red as follows; *A significant portion of these lands are affected by flooding; these lands comprise several long-established businesses.* The wording in black with a strikethrough will be removed as follows; ~~As the affected lands are on~~

~~the margins of the lands, the affected lands could be used for buffer landscaping or same level parking/servicing yard if developed”.~~

- MTFRA 26 has been removed from the industrial land use zoning and the settlement boundary moved inward to exclude the parcel of ground subject to flood risk.
- MTFRA 48 is now referred to as MT354 and the wording within the justification test criteria 2 will be altered with the inclusion of the text in red as follows; ***A significant portion of these lands are affected by flooding; these lands comprise several long-established businesses.*** The wording in black with a strikethrough will be removed as follows; ~~“As the affected lands are on the margins of the lands, the affected lands could be used for buffer landscaping or same level parking/servicing yard if developed”.~~
- MTFRA 50 justification test has been removed as these lands are located outside CFRAM extents.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-93</u>	Department for Agricultural, Environment and Rural Affairs (DAERA) – Strategic Environment Assessment Team	N/A	N/A

Summary of Submission & Issues Raised

- DAERA is content that the environmental report and the process of consultation largely follow the SEA Directive. The reports have been made available to designated authorities, transboundary bodies, and the public. DAERA is content that previous consultations, including the SEA scoping have been considered as part of the Environmental Report.
- A description of the current state of the environment and how this relates to the Draft Monaghan County Council Development Plan 2025-2031 is included within the environmental report. Appropriate environmental objectives / targets / indicators for each of the likely environmental receptors is addressed including an assessment of significant impacts mitigation and monitoring.

Natural Environment Division Comments (NED) in respect of SEA

- The Draft Plan 2025-2031 is limited to within Monaghan County, and they welcome the consideration of transboundary environmental effects within the SEA.
- A Zone of Influence is referred to within the SEA, however no map or distance has been provided.
- Only designated sites have been mentioned within Northern Ireland (NI), it is important to note that impacts can extend beyond Monaghan County and outwith designated sites.
- However, given the level of mitigation and monitoring this will ensure the protection of priority habitats and NED agrees with the conclusions detailed within Section 8.3 of the Plan.
- Sensitivity mapping is detailed within Section 4.13. This is not used in NI as part of the SEA process. However, it is noted that the EPA in Ireland does provide a user guide on the subject. NED notes that in Section 4.13 it does not appear to include layers such as priority habitats. NED also notes from Section 4.13 that the mitigation measures outlined within the report must be adhered to when there is a concentration of environmental sensitivities. No threshold has been provided on at what weighing this occurs. NED advise that mitigation measures must not be limited to areas which have a concentration of environmental sensitivities but to any locations which may result in significant environmental impacts.
- NED advise the five selected themes under which the alternatives have been assessed does not appear to cover all objectives of the plan. They appear very specific such as providing two reasonable alternatives for “*Level of Residential Land Use Zoning in Clones*”. NED suggest that the Alternatives should cover the full extent of the CDP objectives ensuring that all aspects of the plan have an alternative which is then fully assessed with the most environmental suitable alternative incorporated into the plan or a justification provided as to why this is not the case.
- Should there be any changes to the current plan which results in the potential for transboundary impacts then the relevant authorities in NI should be consulted.

Natural Environment Division Comments (NED) in respect of Natura Impact Report

NED notes that no UK National Site Network sites (formally known as European Designated Sites, or Natura sites) have not been included within the NIR. This is contrary to Section 1.3 of the NIR which comprised the following elements “*Identification of European sites within 15km of the CDP boundary with identification of potential pathways links for specific sites (if relevant) greater than 15km from the CDP boundary*”. A list of those NI sites which were not contained within the NIR but which are located within 15km of the county Monaghan border are below (please note that this list may not be

exhaustive as there may be other sites greater than 15km but which have pathways from the CDP boundary and you may need to include these also):

- Moninea Bog SAC (UK0030212)
- Magheraveely Marl Loughs SAC (UK0016621)
- Slieve Gullion SAC (UK0030277)
- Slieve Beagh SAC (UK0016622)
- Slieve Beagh- Mullaghfad – Lisnaskea SPA (UK9020302)
- Upper Lough Erne SAC (UK0016614)
- Upper Lough Erne SPA (UK9020071)

It is unclear if the above sites would have been screened into Stage 2 of the NIR. NED also notes from Section 6.1 the conclusion that *“the Draft CDP is not foreseen to have any significant adverse effects on designated sites situated in Northern Ireland, alone or in combination with other plans or projects”* the conclusion appears to have been based on the mitigation measures contained within the NIR. NED conclude that provided the mitigation contained within the NIR including that all lower tier plans and projects are subject to an Appropriate Assessment (AA) is applied to UK National Site Network sites which would have been screened into the assessment NED is content. We welcome the recognition that further AA will be required at project level and advise continued and early engagement with the relevant bodies in NI as appropriate should there be any potential transboundary effects on NI.

NED would suggest that the NIR is amended to include the sites which have been omitted above. NED advises that should the NIR change in respect to impacts upon UK National Site Network sites then NED should be re-consulted. NED notes from Section 6 that the AA process is ongoing and will inform and be concluded at adoption of the plan.

Climate Change Unit Comments

AQBU has considered the SEA Environmental report and notes that, as per Heritage, Conservation, Biodiversity and Landscape Objective 10 (p142). We are therefore content and have no further comments to offer. Comments on the Natura Impact Report:

- Consideration should be given to objectives that support biodiversity and improve air quality at protected sites.
- The Air Pollution Information System (APIS) Air Pollution Information System | Air Pollution Information System (apis.ac.uk) contains information about the link between air quality and biodiversity loss and now includes information on Ireland’s protected sites.
- APIS also contains a GIS tool which provides information on the impacts of air pollutants, such as NO_x, ammonia emissions and the associated Nitrogen deposition on sensitive habitats and species. The map feature within APIS enables detailed information to be provided on the Critical Levels/Loads for each qualifying feature and background levels of these pollutants: APIS app | Air Pollution Information System.
- Aerial emissions from traffic/industrial/energy processes contribute to nitrogen deposition on sensitive habitats. Consideration should be given to construction and traffic related activities associated with the delivery of projects within the Plan and if they might trigger a significant air quality effect on nearby sensitive habitats or species.

Water Management Unit (WMU) Comments

Notes the conclusion of the Environmental Report that there is the potential for transboundary impacts relating to the water environment to arise in NI due to implementation of the Monaghan Draft County Development Plan 2025-2031

Welcomes that our comments made in response to the scoping exercise have been considered and where appropriate, incorporated into the SEA report. Water Management Unit particularly welcome recognition of the importance of Northern Ireland's River Basin Management Plans.

Plans and Programmes

WMU is broadly supportive of the identified relevant Plans and Programmes and welcomes recognition of the potential for both Intra-plan Cumulative Effects and Inter-plan Cumulative Effects.

Mitigation

Welcomes the inclusion of mitigation measures where the potential for adverse impacts on the aquatic environment has been identified is broadly supportive of these measures and consider it essential that all of those identified are fully implemented. The mitigation measures identified should be reviewed throughout the life of the Draft Plan 2025-2031 and considering the data obtained from the monitoring proposed to ensure the effectiveness of those measures.

Monitoring

WMU is broadly supportive of the monitoring regime proposed in relation to the aquatic environment. Monitoring must be subject to review at each reporting stage to reflect new data obtained. It essential that interventions (including additional mitigation measures or plan revisions where required) are undertaken if any unforeseen or adverse environmental effects to the aquatic environment are identified during the monitoring regime.

Water Management Unit would be supportive of the identification of any positive impacts to the aquatic environment identified as a result monitoring also being reported as this will assist in determining successful environmental actions and therefore may be of use informing future iterations of this or other similar plans.

Land and Groundwater Comments

Ten Groundwater bodies are shared between Co. Monaghan and NI, some of which are monitored in Co. Monaghan under the Water Framework Directive with a status report every 6 years by the Environment Protection Agency. We note that Groundwater protections have been taken into consideration and form part of the Water Protection Objectives. Areas of development which have potential to significantly impact the groundwater environment include quarry/extractive industries; waste management activities/landfill; cemeteries; wind turbine (foundations); geothermal energy/heat pumps and abstractions of groundwater.

LGW advise that further consideration is given in the plan to the impacts of the development of, cemeteries; abstraction activities (including geothermal energy projects) which require net abstraction from groundwater aquifers.

Chief Executive Response

The comments put forward by the Department for Agricultural, Environment and Rural Affairs (DAERA) are welcomed. MCC places a great emphasis on cross border working and cooperation with adjoining authorities. As such in response to your comments made, I can clarify as follows.

- 1) The Zone of Influence of the CDP is conceptual in nature given the scale of the plan and varies depending on which environmental component is being considered. The zone of influence of the Plan will be appropriately clarified in the SEA, ER and NIR. Amendment required.
- 2) Transboundary effects of the Plan have been fully assessed and mitigated under the SEA and AA. Section 4.13 does not state this. Mitigation measures apply to the entire functional area

of Monaghan County Council and surrounding areas within the environmental zone of influence. No change.

- 3) All Reasonable Alternatives considered during the Plan-making process have been considered and evaluated during the Plan-making process. This evaluation is fully presented in Section 6 of the SEA ER. It should be noted that only practical/functional, realistic, and implementable can be considered under SEA, and that the plan and policy hierarchy and the legislative context places parameters around Plan policies/objective and possible alternatives. No change.
- 4) All mitigation presented in the Draft NIR will serve to mitigate potential adverse effects on UK National Site Network sites. Further detail on how UK National Site Network sites were considered in the AA will be provided. Further detail on UK National Site Network sites provided. Amendment required.
- 5) The effect of Plan implementation on ambient air quality has been fully assessed (See the Detailed Evaluation of Environmental Effects, presented in Appendix 3). A variety of mitigation measures have been defined for the purpose of preventing air quality impacts (e.g., Objectives AQO 1, AQO 2 and HCLP 10). These measures will serve to protect biodiversity that may be sensitive to air quality deterioration. Noted.
- 6) Mitigation measures have been integrated into the Draft Plan during the Plan making process, and the monitoring programme proposed within Section 10 of the SEA ER accounts for the efficacy of these mitigation measures.

The set of SEOs established for enabling monitoring and measurement of the Plan's performance will serve as quantifiable indicators for measuring the environmental effects of the Plan. These environmental effects will be monitored once every year over the course of the Plan's six-year lifetime and a monitoring report will be published to document monitoring outcomes.

Where the monitoring identifies that the implementation of the Plan may or has resulted in a significant negative environment effect, an in-depth review of the Plan will take place, and the Plan will be updated in a manner that satisfactorily mitigates these environmental effects.

Similarly, where monitoring indicates that potential positive environmental effects associated with Plan implementation are not being adequately realised, the Plan will be reviewed and updated in a manner that supports the realisation of all potential positive environmental effects, having regard to the overall vision and high-level objectives of the Plan. Noted.

- 7) The remaining points raised in respect of land and groundwater are noted.

Chief Executive Recommendations

The SEA, ER and NIR will require two changes, the Zone of Influence in the CDP will be clarified and further detail on UK National Site Network sites will be provided. This will be detailed in the amended SEA, ER and NIR.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-94</u>	Department of Communities (DFC) (Historical Environment Division) Northern Ireland	N/A	N/A

Summary of Submission & Issues Raised

DfC Historic Environment Division (HED) operate via a Service Level Agreement with colleagues in DAERA in relation to Strategic Environmental Assessment (SEA), whereby, we provide authoritative comment and advice in relation to matters of Cultural Heritage including archaeological and architectural heritage. We make the following comments in relation to the SEA.

HED provided comments at the scoping stage (Appendix 2) highlighting the plan has potential for transboundary effects on cultural heritage, particularly in relation to heritage assets that traverse the border, including earthworks, canals, railways and routeways and those which share interviewing views and historic landscape settings. While HED welcomes this acknowledgment in the report (Chapter 4.5), our datasets (Footnote 44 p.57) have not been fully utilized in the assessment to appropriately consider the potential impacts of the plan on the historic environment in the border region.

Fig 4.6 p.58 – Archaeological Heritage and National Monuments Map. This map includes assets on the NI Sites and Monuments Record, Defence Heritage Record and Areas of Significant Archaeological Interest, though other key NI historic environment datasets have been excluded, i.e. the Historic Buildings Record (including designated and non-designated heritage assets), the Historic Parks & Gardens Register and the Industrial Heritage Record. Conservation Areas Conservation Area Guides (A-Z list) | Department for Infrastructure specifically mentioned in the CH Objectives are also absent from the evidence base map. To ensure potential plan effects on cultural heritage are appropriately informed and assessed, NI historic environment datasets should be suitably and consistently represented.

Table 5.1 p. 93 - Strategic Environmental Objectives. HED scoping comments suggested an objective around the ‘...*protection, conservation and enhancement of archaeological and architectural heritage*’ toward alignment with the NI Regional Development Strategy (RDS, RG11). The proposed plan objectives CH1 and CH2 aim to ‘avoid impacts’ on archaeological and architectural heritage, which raises challenges given the nature of the development plan. An objective which also supports the appropriate management of change, acknowledges the potential for enhancement and includes setting considerations would provide for more robust assessment of potential effects on cultural heritage and better align with draft plan policy objectives and the RDS. Objectives CH1 and CH2 also reference selective NI evidence bases (CH1 NISMR and CH2 NI Conservation Areas). To provide a holistic assessment of potential effects on all heritage assets, HED suggests applying the terms ‘*designated and non-designated heritage assets*’.

Chapter 7.2 p. 121 Evaluation of the Environmental Effects of Plan Implementation. Potential Negative Environmental Effects - Further consideration of potential negative effects on cultural heritage should be taken into account under the bullet points relating to infrastructure, renewable energy, and construction projects, also acknowledging the potential for impacts on the setting of transboundary heritage assets.

Table 7.1 p. 127- Inter-relationship between Environmental Components. HED disagrees with the assessment of inter-relationships between cultural heritage and biodiversity, flora and fauna given the intrinsic synergies between natural and cultural heritage. The landscape context of the natural environment often contributes to the setting of heritage assets, enriching their understanding,

experience and enjoyment. Historic buildings, monuments and sites can also provide important locations for wildlife conservation, including protected species such as bats, birds and insects. HED therefore recommend a further review of the interrelationships between these environmental topics.

Appendix 1 -Relationship of the Plan with other relevant Plans and Programmes HED advises the following NI legislation references should also be included:

- The Planning Act (NI) 2011 (includes vires for the protection of listed buildings and Conservation Areas)
- Historic Monuments and Archaeological Objects (NI) Order 1995

Chief Executive Response

The submission put forward by DFC HED in respect of 'Cultural Heritage' including archaeological and architectural heritage is welcomed. Each of the points raised are addressed below:

- 1) In reference to your comments at the scoping stage (Appendix 2) of the draft CDP, the Environmental Baseline section of the SEA ER (Section 4) will be updated to include additional data/information on heritage in Northern Ireland, in accordance with this commentary. It is noted the level of baseline information provided is proportionate relative to the scale of the CDP in the plan hierarchy and the value of this additional, granular data is limited. In any case, a comprehensive suite of mitigatory policies/objectives have been defined to prevent adverse effects on heritage in Ireland or Northern Ireland.
- 2) The reference to Figure 4.6 at p.58 is noted and the environmental baseline section updated to include additional Northern Irish heritage data/information.
- 3) The commentary in respect of Table 5.1 at page 93 is noted and the Strategic Environmental Objectives (SEOs) pertaining to 'Cultural Heritage' defined in the SEA ER will be updated appropriately.
- 4) In respect of Chapter 7.2 of the draft CDP. A detailed evaluation of the environmental effects of Plan implementation has been completed. This evaluation is presented in Appendix 3 of the SEA ER. The potential effects of the Plan on heritage have been fully assessed at the appropriate scale and a comprehensive suite of mitigatory policy/objectives have been defined to prevent adverse impacts on heritage, including Northern Irish heritage (e.g., BHO 2, PMPO 1, PMP 1). A mitigatory policy is recommended to ensure Northern Irish heritage is more expressly protected during Plan implementation, this is set out in the recommendations below.
- 5) The SEA ER has comprehensively investigated the baseline environments for both environmental components, and all policies and objectives within the draft Plan with a negative effect on either component has been assessed and mitigated against. Table 7.1 of the SEA ER will be updated to account for suggested change.
- 6) In respect of Appendix 1 and the relationship with other relevant plans and programmes it is noted and agreed to update Appendix 1 of the final SEA ER to reflect NI legislative references.

Chief Executive Recommendations

These recommendations relate to the SEA ER, the SEA ER will be updated/amended to include the following:

- 1) Environmental baseline section updated to include additional Northern Irish heritage data/information.
- 2) SEOs pertaining to Cultural Heritage defined in the SEA ER updated.
- 3) The following mitigatory policy will be added to Chapter 7.2 of the SEA ER to ensure Northern Irish heritage is more expressly protected during Plan implementation:
'Ensure development taking place in the Plan area does not have an adverse effect on heritage features situated in Northern Ireland, such as heritage features that traverse the border,

including earthworks, canals, railways and routeways and those which share intervening views and historic landscape settings.'

- 4) Table 7.1 of the SEA ER will be updated to account for suggested change.
- 5) Appendix 1 of the SEA ER will be amended to include the NI legislative references as outlined above.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-116</u>	ESB	N/A	N/A

Summary of Submission & Issues Raised

Introduction:

ESB broadly supports the vision included in Draft CDP. ESB notes continued significant advancement in renewables technology and their submission outlines strategic issues that should be taken into consideration in preparation of final CDP 2025-2031.

Generation, Transmission & Distribution:

It is the ambition that ESB will increase renewables, with 63% of supply from renewable sources by 2030, developing an additional 3.6 GW of new onshore and offshore wind, solar PV and storage assets, and a net zero producer by 2040. ESB is committed to transforming their generation portfolio, replacing old, inefficient plant with a mixture of renewables and high-efficiency gas capacity. To support the transition to a low-carbon future ESB is developing assets such as battery storage, green hydrogen and flexible gas fired units that respond quickly to system demand, key to facilitating large scale renewables in the future.

Roll-out of EV infrastructure:

The ESB has a network of 1,600 charging points across the Island that includes 36 high-powered charging (HPC) hubs. HPCs are primarily located on motorway and primary routes, providing 100 km of range in 6 mins. ESB is rolling out HPCs across the country, to meet the Climate Action Plan 2024's stretching targets for EVC adoption. These hubs will be capable of quickly charging between 2 and 8 vehicles simultaneously and will facilitate vehicles travelling longer distances across Ireland's National and Motorway routes.

ESB Telecoms & Telecommunications Infrastructure:

ESB Telecoms provides network solutions for a wide variety of mobile network operators, wireless broadband providers and public sector business activities. ESB sites are available to third party operators for co-location. ESB telecoms fibre network wrapped on 110kV network provides extensive network throughout Ireland with connectivity to UK. SIRO is bringing 100% fibre-to-the-building to 50 towns, including Carrickmacross and Monaghan, enabling speeds of 1 Gigabit per second.

Planning Policy & Proposed Draft CDP:

The ESB notes NPF & RSES policies in relation to Energy Infrastructure. Climate Act 2021 commits Ireland to a legally binding target of net-zero greenhouse gas emissions no later than 2050, and a reduction of 51% by 2030. Climate Action Plan 2024 – 80% of electricity will be generated by a mix of at least 5 GW offshore wind, 9 GW onshore wind and at least 8 GW from solar PVC, with an additional 2 GW of offshore wind in support non-grid connection generation. Energy storage systems and landside developments for offshore wind and an enhanced electricity transmission and distribution infrastructure are essential to achieving these targets. The ESB welcomes the recognition in Chp. 15.20 Electricity and Gas Infrastructure, for the importance of electricity transmission and distribution infrastructure to ensure growth in the local economy and facilitate residential development.

Electricity Generation, Transmission & Distribution:

The NPF & RSES contain key guidance in relation to decarbonisation of the electricity sector, supporting objectives for enhancement and upgrading of existing infrastructure and safeguarding of strategic energy corridors from encroachment by other developments that would compromise the delivery of energy networks. The new CDP must ensure that the long-term operational requirements of existing utilities are protected. ESB welcomes inclusion of Chp. 15.33 Protection of Public Assets and

Infrastructure, and commitment from MCC to protect electricity infrastructure in the county. (ESB notes in particular NPF NSO No. 8 & RSES RPO 8.4). Appreciates the Draft CDP acknowledges that renewable energy generation facilities are essential to achieve target of becoming a carbon net zero energy provider.

The ESB notes Co. Monaghan is served by 3 no. 110kV stations and by medium voltage networks from 7 no. 38 kV stations. There may be a requirement to construct new High Voltage stations and associated networks to meet future demand. The Distribution System Operator has plans to review existing network capacity and potentially develop new 110kV distribution stations in the county. These shall be required to facilitate the load growth in the area from new and existing businesses and meet climate change targets. Further deep reinforcements may be required to create capacity in the county in next 10-20 years. The exact nature of potential HV stations would depend on location, nature and pace of development.

In this regard, ESB welcome and support high-level policies Chp. 15.20 Gas and Electricity Infrastructure and Chp. 15.33 Protection of Public Assets and Infrastructure. ESB highlight the importance of upgrades to the transmission and distribution infrastructure to facilitate the connection of renewable energy resources.

The ESB notes Policy EGP-1, Chp. 15.20 Electricity and Gas Infrastructure Policies, that any proposed development for electricity infrastructure must comply with the written statements and Policy GGP-2 Chp. 15.20. While Chp. 15.20 recognises that new transmission infrastructure and upgrades to existing infrastructure is required to ensure ongoing adequacy of regional connectivity and to facilitate the connection of renewable energy resources, the primary purpose of the chapter is to ensure that any proposal for electricity infrastructure does not have any adverse effects on the surrounding environment. Therefore, the ESB suggests the final plan could be strengthened with a specific policy objective in Chp. 15, to enable the upgrading, maintenance and development of energy infrastructure whilst considering the sensitivity of the environment landscape. *Proposed Policy Objective, 'Support the sustainable development, upgrading and maintenance of energy, generation, transmission, storage and distribution infrastructure, to ensure the security of energy supply and provide for future needs, as well as protection of the landscape, natural, archaeological and built heritage, and residential amenity.'*

Furthermore, the ESB would welcome opportunities to future proof delivery of electricity infrastructure through greater collaboration between the ESB & local authorities. Early engagement at design stage of key public infrastructure e.g. new roads, public realm, greenways, offer opportunities to provide ducting, underground cabling in the most economically efficient way and limit disruption. ESB supports policy DSG-1 Chp. 15.21, Open Access Ducting, Servicing and Public Lighting. It is recommended that contact be made at early stage of project design.

Generation & Renewables:

In line with Gov. strategies, the ESB is increasing renewables from 30% up to 63% by 2030 with broader technologies likely to be deployed, e.g. offshore wind, wave, solar, etc. The ESB welcomes Renewable Energy Objective REO-1 and REO-4 supporting objectives.

Onshore Wind:

The ESB welcomes Policy REP-1 Chp. 15.17 Renewable Energy Development, that sets out the requirement that proposals be considered against Draft Wind Energy Guidelines 2019 (& any updates). The ESB acknowledges requirement Chp. 8.26 Wind Energy on assessment criteria.

The ESB supports a plan led approach through identification of areas for wind energy development. Note the Draft CDP does not contain a Wind Energy Map, however, the upcoming preparation of a renewable Energy Strategy provides the opportunity to include a map that highlights the ideal areas for Wind Energy development. Furthermore, the recent review of the NPF includes Renewable Energy Capacity Allocations that the Regional Authority should adopt and designated to local authorities for inclusion in County Plans. The ESB requests that Objective REO-2 is amended to include a time bound target for completion of a Renewable Energy Strategy e.g., **REO-2** 'To prepare a Renewable Energy Strategy for the County within 1 year following the publication of the Regional Renewable Electricity Capacity Allocations for the Northern and Western Region ~~over the lifetime of this plan and subject to the availability of resources.~~ Such a strategy shall be shaped and informed by environmental considerations, constraints and sensitivities relevant to the Plan Area – including biodiversity, European sites, and landscape and visual amenity related designations.'

Solar:

The ESB welcomes Chp. 8.2.8 Solar Energy and Renewable Energy Objective REO-7. However, the ESB would welcome an expansion of the objective to include the utility scale solar installation in the County. It is important to note that solar farms have potential to be built on agricultural land, whilst also accompanying the continued use of the land for grazing or for incorporating biodiversity measures with a project.

The ESB considers the overall guidance on solar developments could be strengthened with the provision of extension of duration permission. Currently, Solar PV developments can take in excess of 5 years to develop to construction phase. Securing a grid connection, relevant support tariff or corporate power purchase agreement and securing project finance has introduced significant delays for developers. Therefore, notwithstanding the provisions of Section 42 of the P&D Act 2000 it may be more appropriate for the Planning Authority to retain the option to grant permission for a longer period if requested by the developer in appropriate circumstances.

The ESB advises the lifetime of solar developments is extending with most technologies now suitable for a min. 30 years operation. Investment decisions for projects are being made on project lifetimes of up to 40 years. In this regard, ESB request that permissions are granted with a lifetime up to a max. 40 years. Concerns regarding the deterioration of the infrastructure can be addressed by lodgement of financial security and requirement for a decommissioning plan.

Energy Storage:

The ESB is already installing Battery Energy Storage Systems (BESS) at existing facilities and has recently installed a synchronous condenser, providing for grid stability and displacement of fossil generators. The ESB also highlight that Green Hydrogen, which is produced from renewable energy sources, offers potential for large scale seasonal storage of variable renewable energy. This enables zero carbon backup when intermittent renewables such as wind and solar are not available.

ESB welcome the recognition of Energy Storage Chp. 15.17 Renewable Energy Development. However, there is an opportunity to further support the enhancement of energy security with the inclusion of a specific policy objective supporting these new technologies, Proposed Policy Objective, '*Support and facilitate proposals for secure, appropriately scaled energy storage systems and infrastructure, including green hydrogen gas storage which support energy efficiency and reusable energy systems, provided such proposals accord with the principles of proper planning and sustainable development of the area.*'

Hybrid Renewables:

The ESB notes that by developing hybrid renewables, plant consisting of wind, solar and battery exporting from common point of connection, but at different times, the need for transmission infrastructure associated with new generation is minimised and grid stability can be improved. Proposed Policy Objective, *‘Support and facilitate proposals for hybrid energy systems and/or co-location of renewable energy where applicable where such development has satisfactorily demonstrated that it will not have adverse impacts on the surrounding environment.’*

Renewables – Enabling Plant:

Notwithstanding the Gov’s aim to increase the percentage of renewables, the contribution from non-renewables will still consist of 20%. And on dull still days/nights, almost all electricity may sometimes need to come from non-renewables. Given Co. Monaghan has significant onshore renewables potential, the inclusion of a policy objective will further assist in the transition to a low carbon economy. Proposed Policy Objective, *‘It must also be recognised that natural gas, particularly renewable and indigenous gas, will continue to have a role to play in the transition to a low carbon economy. As such, renewable energy developments may require support from such sources in times of high energy demand.’*

Sustainable Transport & Electric Vehicles:

The ESB notes the Climate Action Plan 2024 has set stretching targets for EV adoption. ESB welcomes all initiatives promoting charging infrastructure; however, it is very important to note that the EU Energy Performance of Buildings Directive calls for an increase to 20% for the number of parking spaces which should have provision for electric vehicle charging infrastructure. The CDP should incorporate the standards as set out in Statutory Instrument No. 393/2021 – European Union (Energy Performance of Buildings) Regulations 2021. Promoting policies and objectives are facilitating growth in charge point infrastructure, to become a comprehensive network of public and domestic charge points, with open systems and platforms accessible to all supply companies and all types of electric cars.

Other Sustainable Transport:

The ESB notes that green renewable hydrogen enables the further electrification of transport allowing the full decarbonisation of the transport sector, as well as improved air quality as the technology replaces diesel buses and diesel HGVs. The ESB has been actively engaging with Hydrogen Mobility Ireland (a partnership of businesses, public sector and academic stakeholders) to deliver a coordinated approach to this cutting-edge technology.

Chief Executive Response

Rapid advancements in renewable technologies are recognised and the Planning Authority acknowledges its role in supporting the roll out of infrastructure. Chapter 8 of the Draft CDP addresses issues arising in this area, with supporting Development Management Standards at Chapter 15.

In acknowledging ESB’s regard for ensuring that infrastructure development does not have adverse impacts on the environment, the Planning Authority supports the proposed policy objective, details of which are set out below in the recommendation.

The Planning Authority also acknowledges and supports the need for early engagement with ESB in respect of ESB at early design stage of infrastructure.

The Planning Authority acknowledges the importance of a Renewable Energy Strategy for supporting renewable energy. In respect of the preparation of a Renewable Energy Strategy for the County, and also noting the recommendation of the OPR, objective REO2 is to be amended to commit to the preparation of a renewable energy strategy for the County and to vary the County Development Plan

to incorporate its recommendations into the adopted Plan within one year of the publication of the Methodology for Local Authority Renewable Energy Strategies or the Regional Renewable Electricity Strategy for the Northern and Western Region, whichever is the sooner.

It is accepted that Policy REO 2, should be amended to include a specific timeframe. In acknowledging the need to further support the enhancement of energy security, the Planning Authority supports the addition of a policy in this regard. It is considered that the proposed policy wording should also include for having regard to health and safety. Details of the proposed objective are set out below in the recommendation.

In support for hybrid renewables, the Planning Authority supports the addition of a policy objective, as set out below.

Regarding solar, further consideration to the inclusion of objectives, policies and guidance can be considered with the preparation of the Renewable Energy Strategy for the County.

Sustainable Transport & Electric Vehicles: to support the roll out of EV charging infrastructure, Development Management Standards 15.24 Car parking standards sufficiently addresses this matter, ‘All residential developments with proposed communal parking and all non-residential proposed development shall normally provide EV car parking space at a rate of one space in five.’

Chief Executive Recommendations

It is recommended that following objectives are included in Chapter 8, Environment, Energy and Climate Change.

Renewable Energy Objectives	
REO 10	Support the sustainable development, upgrading and maintenance of energy, generation, transmission, storage and distribution infrastructure, to ensure the security of energy supply and provide for future needs, as well as protection of the landscape, natural, archaeological and built heritage, and residential amenity.
REO 11	Support and facilitate proposals for secure, appropriately scaled energy storage systems and infrastructure, including green hydrogen gas storage which support energy efficiency and reusable energy systems, provided such proposals have regard for health and safety and accord with the principles of proper planning and sustainable development of the area.
REO 12	Support and facilitate proposals for hybrid energy systems and/or co-location of renewable energy where applicable where such development has satisfactorily demonstrated that it will not have adverse impacts on the surrounding environment.

A proposed amendment to Objective **REO 2** has been included in the response to the OPR submission which reflects the content of this submission.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-121</u>	National Transport Authority	N/A	N/A

Summary of Submission & Issues Raised

NTA has overall responsibility for public transport services in Co. Monaghan, with their role in the county likely to develop further to incorporate some functions related to investment in walking and cycling infrastructure in urban areas, in order to assist the LA in meeting sustainable transport objectives. The submission is, in part, made in the context of this developing role and guiding principles that support compact growth, with a high level of priority and permeability for walking, cycling and public transport, to support outcomes of town centres that are accessible, attractive, vibrant and safe.

Matters contained within the submission include;

Core Strategy:

The submission contends that the continued high level of allocated housing targets to Tier 5, 6, remaining rural area appears to perpetuate the high level of dispersed housing in the county, with the effect to embed a continued reliance on the private car and to undermine investment in sustainable transport alternatives. It is recommend that the Planning Authority considers reallocation of population targets more heavily to Tiers 1-4, in the interests of promoting consolidated development patterns which will support investment in public transport and active travel.

Transport Planning Policies:

The submission welcomes commentary and objectives for transport planning, Chapter 7

Objective TP1 Integrated Transport Plan:

The submission notes Objective TP 1 which would provide a roadmap of strategic transport routes, which it is hoped would provide and promote sustainable transport options. It recommends that the Plan states that the findings of the ITP will be incorporated into the CDP.

Objective TP2 Local Transport Plans:

The submission recommends the inclusion of *using the Area Based Transport Assessment process* for Castleblayney, Clones and Ballybay and that the Plan states how the findings of the LTPs and Town Mobility Plans will be incorporated into the Settlement Plans for the Towns.

Objective SHO5 Village Plans:

The submission recommends that the scope of Tier 4 Village Plans should be altered slightly to reflect a more holistic approach to transport planning for the villages. The submission recommends amended wording:

SHO 5 To prepare Tier 4 village plans during the lifetime of this plan, with a focus on housing, amenity, infrastructure, and ~~parking provision~~ transport.

Mode Share Targets:

The submission notes that no Mode Share Targets are contained in the Draft Plan and therefore recommend inclusion within Plan. In the interest of encouraging and monitoring modal shift over time, mode share targets may play a role, and take account for each settlement, i.e. availability of

public transport, and current trip patterns for intra- and inter- settlement travel. Therefore, measures for achievement of mode share targets should be identified through the development of Local Transport Plans and Integrated Transport Plans.

Development Management Policies

Car Parking Standards:

The submission recommends that the Plan refers to maximum parking standards in the interest of promoting sustainable travel choices - noting the Draft only includes minimum parking standards. The *Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities*, set out the need to reduce the quantum of parking in new developments in order to manage travel demand and ensure vehicular movement does not impede active modes of travel or have undue prominence in the public realm.

Zoning:

The submission refers to the OPR Practice Note PN04: Planning for Employment Growth – The Development Plan & Employment Lands, particularly the consideration of compact growth, the sequential approach, ease of access, when zoning lands for employment. The submission notes in particular lands to the West of Carrickmacross on R178 and to North West of Castleblayney, as being removed from existing built-up areas and recommends the Planning Authority consider whether the zoned lands fulfil the criteria for sustainable employment lands.

Chief Executive Response

Core Strategy:

Noting concerns in relation to continued reliance on the car due to high level of allocation to Tiers 5, 6 and remaining rural areas, I refer to the response to the OPR submission. The population projections in the Core Strategy have been reviewed having regard to the Housing Supply Target Table in the Core Strategy to address population growth over the plan period in accordance with the Housing Supply Target Methodology and the approach set out in at section 4.3.1. of the Development Plan Guidelines. The Core Strategy, Settlement Strategy and associated identification of development potential and zoning are also proposed to be revised in line with the revised Core Strategy. The Core Strategy provides for a significant proportion of future urban development to occur on infill lands within the built up area of existing settlements. In order to encourage brownfield/regeneration development within urban centres, a relaxation of some Development Management standards will be considered where appropriate.

Transport Planning Policies

Objective TP1 Integrated Transport Plan:

Noting the request for the findings to be incorporated into the CDP, an additional Transport Policy Objective TO 9 is proposed for inclusion to support the implementation of the findings, noting the response to the OPR submission to provide for the translation of specific measures / proposals from the ITP, LTPs and sustainable mobility plans, once prepared, into the County Development Plan to give them statutory weight and provide clarity on the settlement zoning maps.

Transport Policy Objective TO 9: To vary the Development Plan to incorporate the objectives and measures of Integrated Transport Plan for County Monaghan when finalised, and to implement its objectives and measures during the lifetime of this plan, subject to funding and available resources.

In response to the OPR submission, it is also proposed that Transport Policy TP 1 be amended to provide for the ITP to commence by 2027 (~~strikethrough text deleted~~, new text in red).

TP 1 To develop an Integrated Transport Plan for County Monaghan to provide a roadmap identifying strategic transport routes that will aim to connect towns, communities and rural areas. The plan will be prepared in collaboration with NTA, TII, DOT and local and national public transport providers, during the lifetime of this plan, ~~subject to available resources~~. commencing by 2027.

Objective TP2 Local Transport Plans:

Noting the recommendation for the inclusion of using the ABTA process for Castleblayney, Clones and Ballybay, the response to the OPR submission provides for the amendment of TP 2 to include for the LTPs to be prepared during the first three years of the Plan and using the ABTA process.

TP 2 To prepare Local Transport Plans using the Area Based Transport Assessments process in Monaghan Town and Carrickmacross, and Sustainable Urban Mobility Plans for the towns of Castleblayney, Clones and Ballybay during the ~~lifetime~~ first three years of this plan, ~~subject to funding and available resources~~.

The response to the OPR submission also provides for amendments to the Roads and Traffic Management Objectives to provide timeframes and to incorporate the ABTA process, as follows:

CBO 5 To prepare a Sustainable Urban Mobility Plan for Castleblayney Town using the Area Based Transport Assessment process, ~~during the lifetime of this plan, subject to available resources~~ commencing by 2026.

CLO 7 To prepare a Sustainable Urban Mobility Plan for Clones Town using the Area Based Transport Assessment process, ~~during the lifetime of this plan, subject to available resources~~ completed by 2025.

BBO 7 To prepare a Sustainable Urban Mobility Plan for Ballybay Town using the Area Based Transport Assessment process, ~~during the lifetime of this plan, subject to available resources~~ commencing by 2026.

Objective SHO5 Village Plans:

Noting the request to reflect a more holistic approach to transport planning for villages, this is considered appropriate. Also noting the response to the OPR submission on this objective, to provide timelines for delivery and focus on housing, amenity, infrastructure, reuse and regeneration, it has been proposed to amend the objective (~~strikethrough text deleted, new text in red~~).

SHO 5 To prepare Tier 4 village plans during the lifetime of this plan, with a focus on housing, amenity, infrastructure, ~~and parking provision~~ transport and the sustainable reuse and regeneration of existing derelict, vacant, or underutilised sites. At least one village plan will be prepared for a village in each of the three Municipal Districts per annum.

This policy objective is also repeated at Section 9.15 – Strategic Objectives for Settlements, Objective VIO 4.

Mode Share Targets: noting the comments to support the inclusion of mode share targets, this recommendation has been considered, however, it is felt that realistic modal shift targets are not currently available for County Monaghan. After completion of the LTPs and SMPs, targets may be set. For now, national policy targets are the most relevant and applicable targets. As per response to OPR submission, objectives have been amended to require implementation of the objectives and measures of Local Transport Plans and Sustainable Urban Mobility Plans for each of the towns, Objectives MTO 14, CMO 11, CBO 6, CLO 8 and BBO 8.

MTO 14 To vary the Development Plan to incorporate the objectives and measures of the Local Transport Plan for Monaghan Town when finalised, and to implement its objectives and measures ~~to support and promote active travel in Monaghan Town~~, during the lifetime of this plan, ~~subject to funding and available resources~~.

CMO 11 To vary the Development Plan to incorporate the objectives and measures of the Local Transport Plan for Carrickmacross Town when finalised, and to implement its objectives and measures ~~to support and promote active travel in Carrickmacross Town~~, during the lifetime of this plan, ~~subject to funding and available resources.~~

CBO 6 To vary the Development Plan to incorporate the objectives and measures of the Sustainable Urban Mobility Plan for Castleblayney Town when finalised, and to implement its objectives and measures ~~to support and promote active travel in Castleblayney Town~~, during the lifetime of this plan, ~~subject to funding and available resources.~~

CLO 8 To vary the Development Plan to incorporate the objectives and measures of the Sustainable Urban Mobility Plan for Clones Town when finalised, and to implement its objectives and measures ~~to support and promote active travel in Castleblayney Town~~, during the lifetime of this plan, ~~subject to funding and available resources.~~

BBO 8 To vary the Development Plan to incorporate the objectives and measures of the Sustainable Urban Mobility Plan for Ballybay Town when finalised, and to implement its objectives and measures ~~to support and promote active travel in Castleblayney Town~~, during the lifetime of this plan, ~~subject to funding and available resources.~~

Development Management Policies

Car Parking Standards:

Noting the recommendation to reflect the maximum parking standards and having regard to the Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities, it is proposed to amend Table 15.6 of the CDP to include for 'Maximum' Car Parking Standard, rather than Minimum. This has also been reflected in the response to the OPR submission.

Zoning:

Noting the comments in respect of the sequential approach to zoning of specific lands for employment, Carrickmacross is strategically located close to the M1 Motorway link at Ardee approximately 80km north of Dublin, 35km south of Monaghan Town and 21km west of Dundalk and is the main town in the south of the County located along the Dublin to Derry (N2) National Route. The town serves the economic needs of a large rural hinterland, which extends into counties Cavan, Meath, Louth and Armagh. In recognition of its role in providing employment, housing and services for the south of the County, Carrickmacross is designated as a town with strategic potential on a regional scale in the Regional Spatial and Economic Strategy for the Northern and Western Regional Assembly Area. In this context it is of strategic economic importance that sufficient economic and employment lands are zoned for the town in spatially appropriate locations to ensure it can fulfil its economic role and continue to grow in a sustainable manner. Having regard to this, viable banks of zoned Industry, Enterprise and Employment lands are spatially distributed around the town to facilitate the uptake of active travel as a means of travelling to places of work. The lands west of Carrickmacross are located along the R178 regional road to Shercock which is part of the route of the proposed East West Link between Sligo and Dundalk as set out in in the Regional Spatial and Economic Strategy for the Northern and Western Regional Assembly Area and thus are strategically located to benefit from the delivery of improvements to this road. As the lands comprise of a former football pitch they benefit from favourable topography for the scale of development and site requirements associated with employment lands. In addition, although there is limited development on this side of Carrickmacross, the lands are located less than 900 metres from the town centre and there is already some employment uses operating at this location which further employment uses can agglomerate with. Therefore, for reasons of appropriate spatial distribution employment lands in the town, proximity to the town centre, and existing topography, these lands are considered to form an important land bank for employment uses. Having regard to the extent the lands zoned in the draft plan extended along the Shercock Road, the quantum of lands zoned has been scaled back to incorporate only those lands comprising of the existing employment use and the undeveloped lands

closest to the town centre. In terms of servicing, a public water mains, a public foul sewer, a public storm sewer, a public footpath and streetlighting are located to the east of the zoned lands and there is the ability to extend the public footpath, street lighting and any other services along the grass verge to the north of the road to connect both the existing employment use and the additional lands to the existing public services.

In terms of the lands identified in the Infrastructure Assessment as CB IEE13 to the NW of Castleblayney, a significant amount of these lands along Milehill Road which are located away from existing enterprises and in a peripheral location outside Built-Up Area of Castleblayney have been dezoned. The remaining lands are either already occupied by existing employment uses or immediately adjacent to these uses.

Chief Executive Recommendations

This submission has resulted in a review of a number of policies and objectives as discussed above. However, these have been addressed sufficiently within the relative proposed policies and objectives amendments contained within the response to the OPR submission. Therefore, no amendments are recommended here.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
MN-C22-MCDP-125	Uisce Éireann	N/A	N/A

Summary of Submission & Issues Raised

- The submission provides observations and comments on a number of sections below and on the documents attached to the Draft CDP in relation to public water services
- The submission states that Uisce Éireann will continue to engage with Monaghan County Council as the County Development Plan process progresses and will also provide updates on Uisce Éireann plans and projects as further updates become available.
- The submission welcomes the inclusion of policies and objectives in the Draft County Development Plan that will support the delivery of Uisce Éireann plans, programmes and policies as well as the sustainable management of water and wastewater in line with national and regional objectives

Core Strategy and Availability of Water Services

- The submission includes tables detailing public water supply capacity and the capacity of all waste water treatment works managed by Uisce Éireann with an overview of the ability of Uisce Éireann to cater for the 2025-2031 population and housing allocations in the settlements listed in the Core Strategy Table.
- All Tier 4 settlements are serviced by public waste water treatment infrastructure and have capacity available (other than Oram - which has a project at design stage to provide further capacity, and Clontibret)
- A number of Tier 5 settlements do not have Uisce Éireann waste water treatment infrastructure (Corcaghan, Corduff, Knockconan, Latton and Lisdoonan).
- The Council should direct development allocations to areas where spare capacity is available to maximise use of existing water services in line with Section 5.3 of the Draft Water Services Guidelines for Planning Authorities (January 2018) and the compact growth objectives of the National Planning Framework.
- Although relatively low densities have been applied in respect of housing, if greenfield development exceeds the housing allocations outlined in the Core Strategy Table, this will increase the likelihood that strategic network reinforcements will be required.

Zoning

- Sequential, phased development in areas with existing services and spare capacity is recommended to optimise existing infrastructure and minimise investment required.
- Network reinforcements such as extensions, upgrades, may be required to service some zoned sites, depending on the location and scale of development.
- Areas served by sewers with a diameter of 150mm or less, or watermains with a diameter of 80mm or less, or parts of the network with older mains infrastructure will require upgrades to facilitate development, and there are parts of the network where the pipe size and materials are unknown.
- The topography of zoned sites may affect options for connecting to existing networks and pumping may be required.
- The need for large amounts of Strategic Residential Reserve zoned land is unclear, and a more focused approach would assist in forward planning for infrastructure and support compact growth principles as longer network extensions and more strategic upgrades would be required to service these sites.
- Depending on the scale of development, upgrades may be required to service industry and employment sites.

- Combined (foul and surface water) sewers is not permitted to maximise the capacity of the foul water collection system. The removal of stormwater from combined sewers using nature-based sustainable drainage solutions is strongly encouraged in order to free up capacity for future development.
- Development in areas at risk of flooding increases the level of complexity, and in turn cost, of the provision of water services.
- The exact requirements to service a site will be determined through the Uisce Éireann connections process and where network reinforcements are required, these shall be developer driven unless there are committed Uisce Éireann projects in place to progress such works.
- Uisce Éireann assets are within a number of the zoned sites in the towns and villages and these assets must be protected or diverted with agreement from Uisce Éireann.
- Greater separation distances apply for development in the vicinity of trunk sewers and watermains and this may be relevant to a number of sites. (Proposed Residential (PR) A sites MT 7 and MT 39, PR B site MT 27, PR A and Strategic Residential Reserve (SRR) site 35, SR site MT 28, and Industry, Enterprise and Employment (IEE) sites MN IEE 1, MN IEE 3, MN IEE 17, and new IEE site south of MT IEE2, IEE site CK 1EE 6, PR B site CL 19 and SRR site CL 11, and IEE sites BB IEE 5 and BB IEE 9.)
- Several zoned sites in the towns and villages, appear to require access to existing services on nearby roads via third party lands.
- There are a number of examples of where the requirements in respect of separation distances in relation to Wastewater Pumping Stations may apply including SRR site MT 10 and IEE sites MN IEE 1, CK IEE 11, CK IEE 13, CB IEE 6, CL IEE 2, CL IEE 3 and BB IEE 6.
- Cognisance should be had to the proximity of SRR sites MT 4 and MT 5, Roosky Action Plan area, in Monaghan to the Monaghan Wastewater Treatment Plant (WWTP), PR A site CK 19 in Carrickmacross to the Carrickmacross WWTP, and Castleblayney town core to the Castleblayney WWTP, as well as the extension of treatment plants in general in the future.
- Site-specific comments have been provided in respect of waste water and water supply for a number of sites in Monaghan Town.
- Site-specific comments have been provided in respect of water supply for a number of sites in Carrickmacross, Castleblayney, Clones and Ballybay.

Wastewater Infrastructure

- Available capacity in the attached waste water treatment capacity table is subject to change and significant new commercial or industrial development has the potential to impact on available capacity and result in the need for infrastructure upgrades.
- Uisce Éireann's 2022 Wastewater Treatment Capacity Register issued to Monaghan County Council in June 2023 is currently being updated and will be issued to Monaghan County Council in the coming weeks.
- Construction is underway on a project to upgrade Carrickmacross WWTP which will improve compliance and available capacity. In Oram, a project to connect into the Castleblayney agglomeration is at the design stage and envisaged to be completed within the lifetime of the Draft CDP.
- In a number of WWTPs in Monaghan, potential spare capacity is available. Potential availability of capacity in this case would be dependent on any additional load not resulting in a significant breach of the combined approach as set out in Regulation 43 of the Waste Water Discharge (Authorisation) Regulations 2007.
- Uisce Éireann and Monaghan County Council are continually progressing sewer rehabilitation activities, capital maintenance activities, and will continue to monitor the performance of the networks to ensure that the most urgent works are prioritised as required.
- A Drainage Area Plan (DAP) for Monaghan town, which is a detailed assessment of the network and identification of issues, was completed in recent years and identified constraints in the Old Cross Square WWPS catchment. As an upgrade of this pumping station and the pipe upstream is

not currently included in the next investment plan period (2025-2029), development in its catchment is limited until the necessary upgrade works are completed. However, interim measures such as infiltration reduction and surface water separation (in cooperation with Monaghan County Council) will be considered in the interim.

- The recast Urban Wastewater Treatment Directive (UWWTD), as proposed, includes requirements for the preparation of Integrated Urban Wastewater Management Plans for selected agglomerations greater than 10,000 persons based on risk, by 2035 as well as obligations for the reduction of pollution load from both wastewater and storm water systems. If adopted, the new UWWTD will require collaboration between Uisce Éireann and Local Authorities on integrated drainage planning.

Water Supply

- Available capacity in the attached waste supply capacity table is subject to change and significant new commercial or industrial development has the potential to impact on available capacity and result in the need for infrastructure upgrades.
- Uisce Éireann Water Resource Zones (WRZ) is outlined in Uisce Éireann's 2022 Water Supply Capacity Register which was issued to Monaghan County Council in June 2023. It is currently being updated and will be issued to Monaghan County Council in the coming weeks.
- County Monaghan is supplied by nine WRZs: the largest of which are Monaghan and Ballybay (Lough Egish) WRZs. Two of Monaghan's WRZs, Glaslough and Emyvale, are supplied by Group Water Schemes.
- Works are planned at Clones Water Treatment Plant to improve water quality and performance.
- Uisce Éireann are also engaging with the Group Water Schemes to assess the potential for future sustainable supply.
- The Regional Water Resources Plan for the North-West region was recently adopted and identified plan-level approaches to address the identified needs in Monaghan in a sustainable manner.
- Uisce Éireann and Monaghan County Council are continually progressing leakage reduction activities, mains rehabilitation activities and capital maintenance activities, and will continue to monitor the performance of the networks to ensure that the most urgent works are prioritised as required.
- Over 9km of rehabilitation works have been carried out in recent years on distribution and trunk mains throughout the County including in Castleblayney, Newbliss, Mullanary, Tirkeenan, Glaslough and Clones, with an additional 1.5km of pipeline approved for delivery last year. Lead services have also been replaced throughout the County and Uisce Éireann will continue to monitor and review the network for mains renewal.
- Uisce Éireann will be carrying out a full network review and hydraulic modelling of all priority settlements to determine if there are any major network constraints and to identify any strategic network upgrades required.

Sustainable Drainage and Green-Blue Infrastructure

- Uisce Éireann encourages Planning Authority objectives and initiatives supporting the implementation of Sustainable Drainage Systems (SuDS) and the enhancement of green and blue infrastructure, which is provided for in the National Planning Framework under NPO 57, and NPO 78 (SuDS) and NPO 82 and 90 (green and blue infrastructure) of the Draft First Revision to the National Planning Framework (July 2024).
- SuDS and green and blue infrastructure are encouraged both in new developments, including the public realm, and as retrofit schemes in existing developed areas as they provide a cost effective and sustainable means of reducing pollution and flooding risk at source, while providing multiple additional benefits such as improved air quality, biodiversity, amenity and noise reduction.

- Limiting or removing surface water inflows to combined sewers increases available capacity for foul drainage for new developments, and is particularly relevant to the achievement of compact growth objectives.
- Uisce Éireann will engage with planning authorities interested in progressing nature-based rainwater management initiatives in line with the recently issued Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas Best Practice Interim Guidance Document for Town Centre First, Regeneration, Transport, Active Travel and Public Realm projects.
- Having regard to Section 6.13 Green Infrastructure in Chapter 6 Heritage, Conservation and Landscape, Uisce Éireann welcomes Monaghan County Council's intention to prepare a Green Infrastructure Strategy for the County and is happy to engage with the Council regarding appropriate measures, such as nature-based rainwater management initiatives.

Planned Road and Public Realm Projects

- Planned public realm, active travel and road projects have the potential to impact on Uisce Éireann assets and projects and development in the vicinity must be in accordance with Uisce Éireann's Standard Details and Codes of Practice with diversion agreements required where Uisce Éireann asset needs to be diverted or altered. Where planned development may impact on Uisce Éireann assets, early engagement is requested to ensure public water services are protected, access is maintained, and service disruption is minimised.

Additional Comments

- Uisce Éireann welcomes objectives in relation to corridors along waterbodies and watercourses (objective WPO 8) in Chapter 8 - Environment, Energy and Climate Change as this will play an important role in protecting biodiversity and water quality. Notwithstanding this, the CDP should allow for access to and maintenance of existing Uisce Éireann infrastructure. Similarly, provision of new or upgraded assets may be required within riparian buffers in limited instances e.g. new outfalls, subject to proper planning and sustainable development.
- The text in Section 8.1.10 Public Water and Waste Water in Chapter 8 - Environment, Energy and Climate Change is very similar to the text in Section 7.8. Uisce Éireann suggests that it should be revised as appropriate for this section of the CDP, or the text in Section 7.8 could be cross referenced here rather than repeated.
- As the table containing objectives PWWO 1 and PWWO 2 in Chapter 8 - Environment, Energy and Climate Change does not include objectives for wastewater, Uisce Éireann suggests that the title could be changed to 'Water Source Objectives'.
- Uisce Éireann welcomes initiatives supporting the circular economy in Section 8.2.7 Bio-Energy and Section 8.3 Waste Management and the Circular Economy and would be happy to engage with Monaghan County Council with regard to circular economy opportunities e.g. bio-gas, re-use of treated wastewater effluent.
- Although reference is made to the GSDS for guidance on SuDs, other guidance of relevance includes Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas – Best Practice Interim Guidance Document , National (Infrastructure) Guidelines and Standards Group recent NGSG Circular 1 of 2023, DMURS Advice Note 5 Road and Street Drainage using Nature Based Solutions Design, Greening and Nature-based SuDS for Active Travel Schemes - National Transport Authority, and Guidance for Urban watercourses by Inland Fisheries Ireland.
- Uisce Éireann welcomes Objective SSO 11 in Chapter 9 - Strategic Objectives for Settlements as there are several large landbanks in the towns and villages that would benefit from master-planning so that sequential connections to water supply and wastewater infrastructure can be undertaken in the most efficient manner.
- Section 9.9 Infrastructure and Services appears to relate to transport only. Inclusion of an objective(s) on other infrastructure and services could be considered.

- Development associated with extractive industries, renewable energy, marine and coastal developments, peat extraction, aquaculture, tourism etc. must have due regard for, and not adversely impact, existing, planned or reasonably foreseeable water sources or Uisce Éireann infrastructure. Uisce Éireann will engage via the planning process for such developments in its role as statutory consultee.
- Developers requiring connections are to engage with Uisce Éireann via our New Connections process.
- With respect to SO 7 regarding the Masterplan and Development Framework for Lough Muckno and its environs it should be noted that further downstream on the River Fane is an Uisce Éireann abstraction point. The relevant objectives of this Draft CDP protecting waterbodies and drinking water sources shall apply.
- As outlined in Draft Water Services Guidelines for Planning Authorities (January 2018), Section 5.3, to maximise the use of existing water services and protect water sources: *'It is the policy of Irish Water [Uisce Éireann] to facilitate connections to existing infrastructure, where capacity exists, in order to maximise the use of existing infrastructure and reduce additional investment costs. There is a general presumption that development will be focused into areas that are serviced by public water supply and wastewater collection networks. Alternative solutions such as private wells or wastewater treatment plants should not generally be considered by planning authorities. Uisce Éireann will not retrospectively take over responsibility for developer provided treatment facilities or associated networks, unless agreed in advance'*.
- The contents of this submission should be taken account of in Appendix 16 - Infrastructure Assessment and Settlement Capacity Audit.
- The contents of this submission should be taken account of in the Environmental Reports.

Suggested Amendments to Chapter 2 – Core Strategy

- Suggests amendment to Policy CSP 1 after Section 2.10:-
To preserve the character of Tier 5 and Tier 6 rural settlements by restricting the scale of development permitted within them, having regard to infrastructure availability and capacity, and to ensure integration with the rural character of the area and the satisfactory provision of infrastructure services.

Suggested Amendments to Chapter 7 – Transport and Infrastructure

- Suggests amendment to text in Section 7.8: Public Water and Wastewater (deletions in strikethrough):-
The provision and maintenance of quality wastewater treatment infrastructure is critical in the interest of sustainable development and the protection of water quality. Uisce Éireann is responsible for the treatment and disposal of wastewater in serviced towns and villages. Uisce Éireann's operations are ~~will be~~ regulated by the Environmental Protection Agency, which ~~who~~ sets environmental standards that ~~which~~ must be complied with in respect of the provision of wastewater infrastructure.
Uisce Éireann's ~~The 2022~~ Wastewater Treatment Capacity Register provides an indication of available capacity at ~~Uisce Éireann~~ Wastewater Treatment Plants (WWTPs) and Water Supply Capacity Register provides an indication of available water supply in Monaghan. The registers are updated on an annual basis and are subject to change throughout the year.
- Suggests amendment to Objective WWO 1:-
To support and co-operate with Uisce Éireann, as appropriate, to deliver ~~a~~ sustainable water ~~supply~~ services in line with the objectives set out in the Core Strategy.
- Suggests amendment to Policy WWP 1:-

To only permit development in instances where there is sufficient capacity in the public water and wastewater infrastructure subject to executed connection by agreement with Uisce Éireann.

Suggested Amendments to Chapter 8 – Environment, Energy and Climate Change

- Suggests amendment to SWDO 1 to align with Paragraph 2 of Section 8.8 and Section 15.22.7, and ensure the potential for implementation of SuDS is maximised (Suggested additional text in red):
To require the use of Sustainable Drainage Systems and Green-Blue Infrastructure in new developments including the public realm and retrofitted in existing developed areas, in line with National Policy Objective 57 of the National Planning Framework.
- Suggests objective PWWO 3 be replaced or complimented with the following:-
To support Uisce Éireann in the development and implementation of Drinking Water Safety Plans which seek to protect human health by identifying, assessing and managing risks to water quality and quantity; taking a holistic approach from source to tap.
- Suggests additional Climate Action objective be included in Section 8.6 Integrating Climate Action into the Development Plan as follows:-
- *To promote water conservation and demand management measures among all water users, and to support Uisce Éireann in implementing water conservation measures such as leakage reduction and network improvements, including innovative solutions in specific situations.*

Suggested Amendments to Chapter 15- Development Management Standards

- Suggests amendments to text in Section 15.1.4 Uisce Éireann Infrastructure (deletions in strikethrough):-
In order to assist the applicant in determining the location of Uisce Éireann assets, the best practice for agents / developers / prospective applicants is to contact Uisce Éireann in advance of designing the proposal.
Where development proposals are permitted in these instances, the permission will often contain a planning condition requiring the applicant to liaise with Uisce ~~Éireann~~Éireann prior to commencement of development works.
Development in the vicinity of Uisce Éireann assets must be in accordance with their Standard Details and Codes of Practice. Diversion/ Build-over Agreements will be required where an Uisce Éireann asset needs to be diverted or altered.
With regard to connecting to Uisce Éireann infrastructure; Developers shall engage with Uisce Éireann through the submission of a pre-connection enquiry to Uisce Éireann, to assess the feasibility of connecting to the network. Further information on this process is available at: <https://www.water.ie/connections/developer-services/>. Developers will be required to provide evidence of consultation with Uisce Éireann when applying for planning permission.
An executed Connection Agreement with Uisce Éireann is required to ensure a connection can be made and capacity is available for a particular development. New connections to Uisce Éireann networks are subject to their Connections Charging Policy.
- Suggests amendment to text in Section 15.8.10 Residential Development in Tier 4 Settlements:-
Residential development and serviced sites on suitable lands located within any of the defined Tier 4 settlements which have capacity within existing public foul drainage and public/group water systems, will be considered subject to compliance with the following:
- Suggests amendment to text in Section 15.8.11 Residential Development in Tier 5 and 6 Settlements:-

Small scale residential development and serviced sites on suitable lands located within any of the Tier 5 and 6 settlements which have capacity within existing Uisce Éireann drainage and public/ group water systems, will be considered subject to compliance with the following:

- Suggests amendment to text in Section 15.22.6 Water Protection:-
Development proposals shall: 1) Be required to connect to the public sewer and public water network where available. Connections to Uisce Éireann infrastructure will be subject to an executed connection agreement with Uisce Éireann.
- Suggests additional objectives be included in Section 8.8 Surface Water Drainage as follows):-
- *To ensure that the Local Authority provides adequate storm water infrastructure in order to accommodate the planned levels of growth within the plan area and to ensure that appropriate flood management measures are implemented to protect property and infrastructure.*
- *To require all new development to provide a separate foul and surface water drainage system and to incorporate sustainable urban drainage systems where appropriate in new development and the public realm.*
- *To prohibit the discharge of additional surface water to combined (foul and surface water) sewers in order to maximise the capacity of existing collection systems for foul water.*

Chief Executive Response

The responses to the issues raised below follow the format and order of the comments set out above.

Core Strategy and Availability of Water Services

- The availability of Water Services capacity in the towns and villages is noted.
- The Council has, in as far as practicable, directed development allocations to areas where spare capacity is available to maximise use of existing water services in line with Section 5.3 of the Draft Water Services Guidelines for Planning Authorities (January 2018) and the compact growth objectives of the National Planning Framework.
- It is accepted that where greenfield development exceeds the housing allocations outlined in the Core Strategy Table, this will increase the likelihood that strategic network reinforcements will be required. This will be addressed through the development management process.

Zoning

- It is agreed that sequential, phased development in areas with existing services and spare capacity optimises existing infrastructure and minimises investment required.
- It is accepted that network reinforcements such as extensions, upgrades, may be required to service some zoned sites, depending on the location and scale of development. These will be at the expense of the developer unless there are proposals by Uisce Éireann to provide this infrastructure as part of its programme of planned investment.
- It is noted that areas served by sewers with a diameter of 150mm or less, or watermains with a diameter of 80mm or less, or parts of the network with older mains infrastructure will require upgrades to facilitate development, and there are parts of the network where the pipe size and materials are unknown. It is also noted and accepted that the topography of zoned sites may affect options for connecting to existing networks and pumping may be required. This will be at the expense of the developer unless there are proposals by Uisce Éireann to provide this infrastructure as part of its programme of planned investment.

- A significant amount of Strategic Residential Reserve zoned land is proposed to be dezoned or rezoned to ensure a more focused approach in the provision of infrastructure and to support compact growth principles.
- It is noted and accepted that depending on the scale of development, upgrades may be required to service industry and employment sites.
- Section 15.22.7 of the development plan requires all new developments in urban areas to implement nature-based solutions in accordance with Nature Based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas (DHLGH, 2022), where appropriate.
- It is accepted that development in areas at risk of flooding increases the level of complexity, and in turn cost, of the provision of water services. Sites at risk of flooding have been zoned Landscape Protection/ Conservation except where existing development exists or justification has been provided under the Strategic Flood Risk Assessment prepared in conjunction with the development plan. The zoning of land at risk of flooding has only occurred where it is in keeping with the principles set out in the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) and / or has been justified under the Strategic Flood Risk Assessment.
- It is noted and accepted that the exact requirements to service a site will be determined through the Uisce Éireann connections process and where network reinforcements are required, these shall be developer driven unless there are committed Uisce Éireann projects in place to progress such works.
- Monaghan County Council acknowledges that some Uisce Éireann assets are within a number of the zoned sites in the towns and villages and will require any development proposals to ensure that these assets are protected or diverted with agreement from Uisce Éireann. Section 15.1.4 Uisce Eireann Infrastructure within Chapter 15 – Development Management Standards addresses this.
- It is noted that greater separation distances apply for development in the vicinity of trunk sewers and watermains and this may be relevant to a number of sites. This will be addressed through the development management process.
- In relation to zoned sites in the towns and villages appearing to require access to existing services on nearby roads via third party lands, this was considered as part of the Infrastructure Assessment and where this was the case the lands were categorised as Tier 2 lands. Lands were only zoned if they met the criteria set out in the Development Plan Guidelines for Planning Authorities and in accordance with Appendix 3 of the National Planning Framework.
- It is noted that separation distances in relation to Wastewater Pumping Stations may apply. This will be addressed through the development management process.
- It is accepted that cognisance should be had to the proximity of lands zoned for residential use in vicinity of existing wastewater treatment plants, as well as to the potential for the extension of these treatment plants in the future. It this regard a cordon sanitaire has been applied where appropriate. Furthermore, the acceptability of development in close proximity to waste water treatment plants will be assessed through the development management process.
- The site-specific comments provided in respect of waste water and water supply for a number of sites in Monaghan Town have been considered as part of the review of the Infrastructure Assessment and changes made where appropriate.
- The site-specific comments provided in respect of water supply for a number of sites in Carrickmacross, Castleblayney, Clones and Ballybay have been considered as part of the review of the Infrastructure Assessment and changes made where appropriate.

Wastewater Infrastructure

- It is noted that the available capacity in the attached waste water treatment capacity table is subject to change and significant new commercial or industrial development has the potential to impact on available capacity and may result in the need for infrastructure upgrades.

- The updated Uisce Éireann's 2022 Wastewater Treatment Capacity Register issued to Monaghan County Council in December 2024 has been reviewed and as a result no changes to the development plan are envisaged.
- It is noted that construction is underway on a project to upgrade Carrickmacross WWTP which will improve compliance and available capacity. It is further noted that a project to connect Oram into the Castleblayney agglomeration is at the design stage and envisaged to be completed within the lifetime of the Draft CDP.
- It is noted that in a number of WWTPs in Monaghan, potential spare capacity is available.
- It is noted that Uisce Éireann and Monaghan County Council are continually progressing sewer rehabilitation activities, capital maintenance activities, and will continue to monitor the performance of the networks to ensure that the most urgent works are prioritised as required.
- It is noted that an upgrade of this the Old Cross Square waste water pumping station and the pipe upstream is not currently included in the next investment plan period (2025-2029), and that development in its catchment is limited until the necessary upgrade works are completed. However, it is agreed that interim measures such as infiltration reduction and surface water separation will be applied in the interim to facilitate new development where appropriate and viable. This will be assessed through the development management process.
- The provisions of the recast Urban Wastewater Treatment Directive (UWWTD), as proposed are noted. In respect of County Monaghan, it is not envisaged that any of the settlements within the County will have populations in excess of 10,000 persons by end of the development plan period.

Water Supply

- It is noted that the available capacity in the attached waste supply capacity table is subject to change and significant new commercial or industrial development has the potential to impact on available capacity and may result in the need for infrastructure upgrades.
- The updated Uisce Éireann Water Resource Zones (WRZ) is outlined in Uisce Éireann's 2022 Water Supply Capacity Register issued to Monaghan County Council in December 2024 has been reviewed and as a result no changes to the development plan are envisaged.
- It is noted and welcomed that works are planned at Clones Water Treatment Plant to improve water quality and performance.
- Given the number of Group Water Schemes operating within County Monaghan, the engagement of Uisce Éireann with the Group Water Schemes to assess the potential for future sustainable supply is welcomed.
- It is noted that the Regional Water Resources Plan for the North-West region was recently adopted and has identified plan-level approaches to address the identified needs in Monaghan in a sustainable manner.
- It is noted that Uisce Éireann and Monaghan County Council are continually progressing leakage reduction activities, mains rehabilitation activities and capital maintenance activities, and will continue to monitor the performance of the networks to ensure that the most urgent works are prioritised as required.
- The rehabilitation works carried out in recent years on distribution and trunk mains throughout the County and the approval of an additional 1.5km of pipeline for delivery is welcomed. The continued monitoring and review of the network for mains renewal requirements is also welcomed.
- It is noted and welcomed that Uisce Éireann will be carrying out a full network review and hydraulic modelling of all priority settlements to determine if there are any major network constraints and to identify any strategic network upgrades required.

Sustainable Drainage and Green-Blue Infrastructure

- The comments in respect of Sustainable Drainage Systems (SuDS) and the enhancement of green and blue infrastructure are noted and accepted.

- It is accepted that limiting or removing surface water inflows to combined sewers will increase available capacity for foul drainage for new developments, and will assist in the achievement of compact growth objectives.
- It is noted that Uisce Éireann will engage with planning authorities interested in progressing nature-based rainwater management initiatives particularly for Town Centre First, Regeneration, Transport, Active Travel and Public Realm projects.
- The comments in respect of Monaghan County Council's intention to prepare a Green Infrastructure Strategy for the County are noted and the offer to engage with the Council regarding appropriate measures, such as nature-based rainwater management initiatives is welcomed.

Planned Road and Public Realm Projects

- It is accepted that planned public realm, active travel and road projects have the potential to impact on Uisce Éireann assets. The need to liaise with Uisce Éireann in advance of any works is addressed in Section 15.1.4 Uisce Éireann Infrastructure within Chapter 15 – Development Management Standards.

Additional Comments

- The comments in respect of objectives in relation to corridors along waterbodies and watercourses are acknowledged. However, it is considered that the request to allow access to and maintenance of existing Uisce Éireann infrastructure lies outside the remit of the development plan. It is accepted that new or upgraded assets may be required within riparian buffers in limited instances, provided these works are carried out sensitively.
- It is accepted that the text in Section 8.1.10 Public Water and Waste Water in Chapter 8 - Environment, Energy and Climate Change is similar to the text in Section 7.8. However, it is considered this text is required to be contained within both Chapters.
- It is proposed that the title of the table containing objectives PWVO 1 and PWVO 2 in Chapter 8 - Environment, Energy and Climate Change should be changed to 'Water Source Objectives'.
- The comments in respect of initiatives supporting the circular economy in Section 8.2.7 Bio-Energy and Section 8.3 Waste Management and the Circular Economy are noted. The offer to engage with Monaghan County Council with regard to circular economy opportunities is welcomed.
- It is recommended that the documents Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas – Best Practice Interim Guidance Document, National (Infrastructure) Guidelines and Standards Group recent NGS Circular 1 of 2023, DMURS Advice Note 5 Road and Street Drainage using Nature Based Solutions Design, Greening and Nature-based SuDS for Active Travel Schemes - National Transport Authority, and Guidance for Urban watercourses by Inland Fisheries Ireland be referenced in Section 8.8 Surface Water Drainage within Chapter 8 - Environment, Energy and Climate Change.
- The comments in respect of Objective SSO 11 in Chapter 9 - Strategic Objectives for Settlements are noted and welcomed.
- It is not proposed to amend Section 9.9 Infrastructure and Services.
- It is accepted that development associated with extractive industries, renewable energy, marine and coastal developments, peat extraction, aquaculture, tourism etc. must have due regard for, and not adversely impact, existing, planned or reasonably foreseeable water sources or Uisce Éireann infrastructure. It is noted that Uisce Éireann will engage via the planning process for such developments in its role as statutory consultee.
- It is accepted that developers requiring connections are to engage with Uisce Éireann via the New Connections process.
- With respect to SO 7 regarding the Masterplan and Development Framework for Lough Muckno and its environs it is noted that Uisce Éireann abstraction point further downstream on the River Fane.

- Section 5.3 of the Draft Water Services Guidelines for Planning Authorities (January 2018) is noted.
- The contents of the submission have been taken account of in the review of Appendix 16 - Infrastructure Assessment and Settlement Capacity Audit.
- The contents of this submission have been taken account of in the Environmental Reports.

Suggested Amendments to Chapter 2 – Core Strategy

- It is proposed that Policy CSP 1 after Section 2.10 be amended as follows (Suggested additional text in red):-
*To preserve the character of Tier 5 and Tier 6 rural settlements by restricting the scale of development permitted within them, **having regard to infrastructure availability and capacity**, and to ensure integration with the rural character of the area and the satisfactory provision of infrastructure services.*

Suggested Amendments to Chapter 7 – Transport and Infrastructure

- It is proposed that the text in Section 7.8: Public Water and Wastewater be amended as follows (Suggested additional text in red and deletions in strikethrough):-
*The provision and maintenance of quality wastewater treatment infrastructure is critical in the interest of sustainable development and the protection of water quality. Uisce Éireann is responsible for the treatment and disposal of wastewater in **serviced** towns and villages. Uisce Éireann's operations ~~are will be~~ regulated by the Environmental Protection Agency, ~~which who~~ sets environmental standards ~~that which~~ must be complied with in respect of the provision of wastewater infrastructure.
Uisce Éireann's The 2022 Wastewater Treatment Capacity Register provides an indication of available capacity at Uisce Éireann Wastewater Treatment Plants (WWTPs) and Water Supply Capacity Register provides an indication of available water supply in Monaghan. The registers are updated on an annual basis and are subject to change throughout the year.*
- It is proposed that Objective WWO 1 be amended as follows (Suggested additional text in red and deletions in strikethrough):-
*To support and co-operate with Uisce Éireann, as appropriate, to deliver ~~a~~ sustainable water ~~supply~~ **services** in line with the objectives set out in the Core Strategy.*
- It is proposed that Policy WWP 1 be amended as follows (Suggested additional text in red):-
*To only permit development in instances where there is sufficient capacity in the public water and wastewater infrastructure **subject to executed connection by agreement with Uisce Éireann.***

Suggested Amendments to Chapter 8 – Environment, Energy and Climate Change

- It is proposed that objective SWDO 1 be amended as follows (Suggested additional text in red):-
*To **require** the use of Sustainable Drainage Systems and Green-Blue Infrastructure in new developments including the public realm and retrofitted in existing developed areas, in line with National Policy Objective 57 of the National Planning Framework.*
- It is proposed that an additional objective be inserted as PWWO 3 within Section 8.1.10 as follows (Suggested additional text in red):-
To support Uisce Éireann in the development and implementation of Drinking Water Safety Plans which seek to protect human health by identifying, assessing and managing risks to water quality and quantity; taking a holistic approach from source to tap.
- It is proposed that an additional Climate Action objective be included as CAO 16 in Section 8.6 Integrating Climate Action into the Development Plan as follows (Suggested additional text in red):-

- *To promote water conservation and demand management measures among all water users, and to support Uisce Éireann in implementing water conservation measures such as leakage reduction and network improvements, including innovative solutions in specific situations.*

Suggested Amendments to Chapter 15- Development Management Standards

- It is proposed that the text in Section 15.1.4 Uisce Eireann Infrastructure be amended as follows (Suggested additional text in red and deletions in strikethrough):-
In order to assist the applicant in determining the location of Uisce Éireann assets, the best practice for agents / developers / prospective applicants is to contact Uisce Éireann in advance of designing the proposal.
Where development proposals are permitted in these instances, the permission will often contain a planning condition requiring the applicant to liaise with Uisce ~~Eireann~~Éireann prior to commencement of development works.
Development in the vicinity of Uisce Éireann assets must be in accordance with their Standard Details and Codes of Practice. Diversion/ Build-over Agreements will be required where an Uisce Éireann asset needs to be diverted or altered.
With regard to connecting to Uisce Éireann infrastructure; Developers shall engage with Uisce Éireann through the submission of a pre-connection enquiry to Uisce Éireann, to assess the feasibility of connecting to the network. Further information on this process is available at: <https://www.water.ie/connections/developer-services/>. Developers will be required to provide evidence of consultation with Uisce Éireann when applying for planning permission.
An executed Connection Agreement with Uisce Éireann is required to ensure a connection can be made and capacity is available for a particular development. New connections to Uisce Éireann networks are subject to their Connections Charging Policy.
- It is proposed that the text in Section 15.8.10 Residential Development in Tier 4 Settlements be amended as follows (Suggested additional text in red):-
Residential development and serviced sites on suitable lands located within any of the defined Tier 4 settlements which have capacity within existing public foul drainage and public/group water systems, will be considered subject to compliance with the following:
- It is proposed that the text in Section 15.8.11 Residential Development in Tier 5 and 6 Settlements be amended as follows (Suggested additional text in red and deletions in strikethrough):-
Small scale residential development and serviced sites on suitable lands located within any of the Tier 5 and 6 settlements which have capacity within existing Uisce ~~Eireann~~Éireann drainage and public/ group water systems, will be considered subject to compliance with the following:
- It is proposed that the text in Section 15.22.6 Water Protection be amended as follows (Suggested additional text in red):-
Development proposals shall: 1) Be required to connect to the public sewer and public water network where available. Connections to Uisce Éireann infrastructure will be subject to an executed connection agreement with Uisce Éireann.
- It is proposed that additional objectives be included as CAO 17, CAO 18 and CAO 19 in Section 8.8 Surface Water Drainage as follows (Suggested additional text in red):-
- *To ensure that the Local Authority provides adequate storm water infrastructure in order to accommodate the planned levels of growth within the plan area and to ensure that appropriate flood management measures are implemented to protect property and infrastructure.*
- *To require all new development to provide a separate foul and surface water drainage system and to incorporate sustainable urban drainage systems where appropriate in new development and the public realm.*

- *To prohibit the discharge of additional surface water to combined (foul and surface water) sewers in order to maximise the capacity of existing collection systems for foul water.*

Chief Executive Recommendation

It is recommended that the elected members amend the draft County Development Plan 2025-2031 to incorporate the proposed changes as appropriate in the responses set out above.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
MN-C22-MCDP-128	The Heritage Council	N/A	N/A

Summary of Submission & Issues Raised

The Heritage Council welcome the opportunity to comment on the Draft County Monaghan Development Plan 2025-2031. Comments deal with both built/ cultural heritage and natural heritage, as the matters appear in the plan. Ireland’s national heritage is defined in the Heritage Act, 1995 as including: *‘monuments, archaeological objects, heritage objects, architectural heritage, flora, fauna, wildlife habitats, landscapes, seascapes, wrecks, geology, heritage gardens, and parks and inland waterways’*.

National and Local Policy Context

The submission refers to a number of important National and Local policy documents which promote the role of heritage in the planning process, including:

- **National Planning Framework (NPF):** Identifies “Enhanced Amenities and Heritage” as one of our national strategic outcomes. Within this, the NPF correctly notes that built, cultural and natural heritage has intrinsic value in defining the character of urban and rural areas, adding to their attractiveness and sense of place. National policy objectives 16, 17 and 52 in the NPF give further support to this ambition and there is a need to reflect this in county.
- **Development Plans – Guidelines for Local Planning Authorities:** Features of special architectural, historical, or natural value are our heritage assets, and mandatory objectives under the themes of ‘heritage and landscape’ have been identified throughout these guidelines, which should be included as objectives in the development plan.
- **The 4th edition of Ireland’s National Biodiversity Action Plan (NBAP) 2023 –2030:** Reference is made to key outcomes 2A, 3C, 3C2 and 3C3 and actions 1B9 and 1C5 in the NBAP regarding biodiversity conservation which should be considered by local authorities.
- **Heritage Ireland 2030:** Reference is made to actions 22, 26 and 37 of the Heritage Plan which should be included in the Development Plan.
- **The Guidelines for Planning Authorities on Architectural Heritage Protection:** Guidance contained within Chapters 2 and 3 with regards to the Record of Protected Structures and Architectural Conservation Areas. The Office of the Planning Regulator has also provided guidance on Archaeology in the Planning Process through Planning Leaflet 13.
- **The Northern and Western Regional Spatial & Economic Strategy 2020 - 2032:** Chapter 5 provides policy on the environment, including natural heritage and built heritage, in particular **RPOs 5.3 to 5.17** of this RSES.

General Comment

The Heritage Council notes that a new chapter on heritage is needed, or clear objectives and policies for quality design should be drafted within the existing chapter. Whilst elements of good design and placemaking may have been included in the heritage, transport and climate change policies, there are no clear guiding policies, either at a strategic level or in individual chapters for the following:

- The importance of heritage-leading regeneration in towns and villages.
- The need for quality public realm and landscaping proposals, which work off inherent strengths such as existing heritage and landscape features.
- The need for less traffic/car-dominated streetscapes and greater pedestrianisation of towns and villages in the county.

The submission raises concerns about the Irish town and village which is under considerable threat with vacancy and dereliction evident in many settlements. One of the main issues is that towns and villages are often planned as a “place to pass through rather than place to be”, leading to an over

engineered rather than a designed built environment. This leads to an unpleasant living environment, with car noise and “traffic outside the front window”, discouraging not just living in town but also a more vibrant on street terrace culture for the hospitality sector. This is a threat to town vibrancy, with dispersed housing patterns also not helping.

The Heritage Council believe the Irish town and village is an important part of our national heritage and to see it fall further into decline would be a lamentable reflection of planning policy. This issue should be noted upfront in a design and/or a placemaking strategic policy with adequate policy provided throughout the plan.

The submission suggests the inclusion of such policies in Chapter 9 – Strategic Objectives for Settlements. A placemaking and quality design section could be integrated into this chapter. The Heritage Council believes that currently the lack of a quality placemaking and design narrative is a major shortcoming in the draft Monaghan County Development Plan 2025-2031. Please note that amendments to policies are suggested in this submission. Suggested additions are in bold text, with deletions via ~~strikethrough~~.

CHAPTER 2 – Core Strategy

- The core strategy strategic objective is overly skewed towards enabling development only. A more balanced objective is needed, one that reflects planning in the common good i.e. an orderly scheme of development in the light of known constraints and accepted opportunities. The following amendment (or something similar) to CSSO 1 is suggested: “To ensure that new development within the County will provide for sustainable and balanced development that enables economic growth, delivery of accessible and high-quality infrastructure and services, in a manner that protects our rich heritage and environment, and guides population growth in accordance with the settlement strategy”.
- The Heritage Council supports the policies and settlement strategy in this plan for consolidation and compact growth. Achieving more consolidated growth will reduce:
 - Greenhouse gas emissions from the built environment.
 - Ensure that land take is restrained and does not pose undue threats to cultural and natural heritage.
- The Heritage Council supports policies for clustering activity for all the tiers of settlements in Monaghan, which is in line with national policy.
- The submission recognises the challenging issue of managing isolated rural housing and note the emphasis, through Policy SHO 7, for “dispersed communities” as opposed to dispersed dwellings. It is very important that the idea of nodes, i.e. a crossroads with a church, a community hall, or another amenity, is seen as a centre point for clustering rural dwellings. Scoping the potential for additional dwellings in these locations is an important recognition and reflects our position on planning policy in terms of providing modern day clachans/hamlets in such locations.
- While this may not be necessarily the most compact of rural settlement types, it does mitigate somewhat the negative effects of scattered rural dwellings. It is contended that the policy, as drafted, seems to exclude non-detached dwellings or is overly prejudiced towards them.
- The following amendment to the Dispersed Rural Communities Objective SHO 7 is recommended: “To support the viability of dispersed rural communities as locations for sustainable housing and to seek to encourage the growth of Tier 6 settlements generally in the form of single dwellings or small-scale multi-house developments”.
- The submission supports Objective RSO 1, however, suggests that there is a need to review Objective RSP 2 in this regard, as this objective is rather negative and seems to set exceptional requirements for what is essentially development within settlements. It may also work against Policies RSO 1 and CSP 3. If such settlements are to provide a more sustainable alternative to

one off housing, policy should be supportive of such locations – it seems excessive at present and needs amending.

- Figure 2.4 ‘determining density’ is an important diagram for informing efficient use of land. However, in step 1, accessibility must include access to amenities and services (i.e. the trip generating uses). Access to schools and employment, secondarily retail and leisure facilities are just as important as access to public transport. Both accessibility to amenities/services and public transport should be identified in this step. The submission notes that this is sourced from the Compact Settlements Guidelines 2024, however Monaghan County Council should bear this in mind when defining density levels.

Chapter 6 – Heritage, Conservation and Landscape

- There are several important provisions that forward plans, both county development plans and local area plans, should make policy for.
- Monaghan is an example of a county where only a small fraction of the land area is designated for nature conservation. With the exception Slieve Beagh SPA/NHA and the Kilroosky Lough Cluster SAC, there are no designated nature conservation sites, with vast swathes of the county having no statutory protection. This would include wetland sites also.
- The Heritage Council not only supports Objective HCLO 3, but believes it is particularly necessary in a Monaghan County development plan.
- The County does have several proposed Natural Heritage Areas (pNHAs), which identify additional nature conservation sites. The county development plan is the only avenue through which such sites get protection.
- Policies on green infrastructure networks/ecological corridors, which are present in this plan, are welcome in terms of their importance for ecological features that are critical for wider landscape level connectivity.
- The submission welcomes the identification of the proposed Natural Heritage Areas in Table 6.3 (with their listing and the summaries provided) and the identification of County Sites of Biodiversity Importance which aligns with the Heritage Council’s aspiration for a universally applied locally important biodiversity sites identification process. The submissions also support objective HCLP 5 and Policy HCLO 14.
- The submission recommends that each objective/policy regarding NHAs/pNHAs and/or county biodiversity sites includes a requirement for an ecological assessment. Specific mention should be given in the preamble to the objectives, specifically concerning Sliabh Beagh, to include The Hen Harrier Threat Response Plan, and summaries this in the relevant sections. Given that Monaghan has one of the six SPAs for the Hen Harrier it is important to amplify its importance.
- HCLO 13, needs to be revisited as it is not clear what is “lower level of decision making”.
- HCLO 17, why does this objective confine the ambition for hedgerow and native planting to local authority owned development. This objective needs to be expanded to all developments, irrespective of the applicant, not just for hedgerow and native planting to local authority owned development.
- A policy is needed for the retention of natural features generally through site design iterations. The following is suggested: “All developments, should seek to retain natural features e.g. hedgerows, stands of trees, minor watercourses, as part of the design of schemes. Unnecessary removal of any natural features will be resisted.”
- In relation to paragraph 6.11.1 Areas of Primary Amenity Value, “cultural heritage features” should be included in the last paragraph in this section and Policy PAP 1 amended as such: “To restrict development in Areas of Primary Amenity Value to sites where it can be demonstrated to the satisfaction of the Planning Authority that the proposed development would not threaten the scenic, cultural and natural heritage, or environmental quality of the area.” Policy SAP 2 should be amended as follows; “To limit development in Areas of Secondary Amenity

Value and to only permit compatible amenity developments where they do not unduly impact on visual amenity or the natural and cultural heritage of the area”.

- The Heritage Council welcome the inclusion of policies for County Geology Sites. Monaghan benefits from several unique geological sites. However, **GEP 2** needs to be redrafted as follows; “Where a proposed development is likely to impact on the setting or integrity of County Geological Sites listed in Table 6.7, an assessment of its impacts will be required and of the Monaghan County Development Plan 2025 –2031 the Geological Survey of Ireland shall be consulted. Any proposal that has significant negative impacts will not be supported”. It is not necessary to mention the plan in the policy, and the protection of important geological sites should not be relying on an external organisation having the resource to respond to each application that may impact on a feature. The burden of proof should be put on the applicant in the first instance, while indeed the GSI should be consulted also.
- In terms of Policy GEP 5, emphasis on the Rockcorry-Cootehill ribbed Moraine and the Scotshouse-Redhills as unique landscapes, is important. This reflects the site summary for these assets and the Heritage Council recommend that they are reflected in the relevant landscape character assessments. In this context we note that this important area, which has been described as having the “largest individual ribbed moraines found anywhere in the world”, is not reflected in the primary or secondary amenity areas. This is a significant oversight, and it is recommended that the local authority familiarise itself with the site synopsis and ensure that these geologically unique landscapes are accounted for in landscape policies.
- The Heritage Council wishes to ensure that ecological networks are distinct amidst the general green infrastructure network. Several features of green infrastructure, particularly green spaces, active travel and recreation routes may have limited ecological potential and depend highly on design and maintenance regimes. Within green infrastructure, there are two key ecological threads:
 1. Sites – SPAs/SACs/NR/NHAs/pNHAs/County Biodiversity Sites or Locally Important Biodiversity Sites.
 2. General natural features/connections – ecological corridors/networks i.e. hedgerows/smaller stands of trees/watercourses, scrubland, smaller wetland sites.

The submission welcomes that the green infrastructure policies in this plan are primarily drafted with ecology in mind.

- The submission notes the importance of including Objective GIO 5 in relation to the protection of hedgerows.
- Policy TWP2, the Tree Preservation Orders should be designated as part of the plan, rather than having an aspiration to designate.
- The Heritage Council continue to believe that the statutory protection of structures through the Record of Protected Structures (RPS), and/or collection of structures and features through ACAs, remains the most important heritage protection function in Irish planning. In this regard, the Heritage Council welcome Objective BHO1 and BHO5.
- The Heritage Council is concerned that more minor planning considerations such as development management standards with respect to parking, amenity distances etc., may be compromising more important strategic planning objectives. Policies in county development plans should not apply rigid standards to the re-use of designated and non-designated heritage properties. The submission supports Policy BHP5 in this section. We would only suggest that the first line is amended to include “non designated heritage assets”. These would include vernacular buildings in villages and towns, and properties listed on the NIAH, and in particular properties which may not be protected by ACAs.
- In terms of ACAs, we note that there are 20 designated ACAs and generally support the policies and objectives as drafted.

- Section 6.17.2 Architectural Conservation Areas (ACAs) and in particular objective ACO 1 seeks to ‘To carry out a comprehensive review of the Architectural Conservation Areas within the County during the lifetime of this Plan, subject to available resources.’ However, there appears to be an absence of detailed mapping of ACAs in the plan as presented, which is unusual and needs to be rectified for the sake of clarity. There may also be cases where adjacent ACAs could be merged but it is difficult to assess this in the absence of any concise mapping.
- A strategic map of the ACA locations should be provided, while each of the village and settlement plan maps should clearly show them. There appears to be a “landscape/Conservation” label in the legend to each settlement plan map. These should be amended to more accurately reflect the ACA designation.

We support the objective of carrying out a review of the ACAs and we suggest that a key measure to deliver this is the employment of an Architectural Conservation Officer to address not just this, but also:

- Planning and development - relates to Protected Structures
- Heritage-led regeneration
- Efficient management of grant aid to the Council and building owners

Archaeological Heritage

The submission welcomes the section in the draft Development Plan on archaeological heritage, and notes some of the threats to archaeology and objectives/policies to mitigate such threats. In effect, objectives are a targeted goal, whereby policies are needed to achieve such goals. The submission suggests that some policies are amended as follows:

- A new policy should be drafted that prohibits development on archaeological sites. This policy should then establish exceptional circumstances for any negative impact on archaeological sites or features, and also the required archaeological assessment required.
- Amend PMP 1 as follows - Development adjacent to an archaeological monument or site will only be acceptable where it is sited in a manner which ensures that there are no significant impacts on the monument and its setting. Development which is likely to have an adverse impact upon an archaeological monument or site or its setting shall be resisted.
- A new policy is required to follow immediately from Policy PMP2 that states the following: “PMP X - In cases where preservation by record is required, information and interpretation of the historic archaeology in and around the site should be part of the design considerations for the site. This can be achieved by street naming, and landscape and public realm design”.
- A new policy that establishes public rights of way to archaeological sites, through the development plan, and ensures that development proposals do not prejudice or compromise access to such sites is also needed.

Chapter 7 Transport and Infrastructure

The Heritage Council supports public transport and walking/cycling infrastructure as one of the main ways through which the planning system can contribute to reducing greenhouse gas emissions. The following amendments are suggested:

- Regarding TISO 1 – “To promote and facilitate a sustainable, efficient, and integrated transport system and ease of movement throughout County Monaghan by enhancing the existing and delivering new transport infrastructure in terms of road transport, public transport, cycling and pedestrian facilities, and by promoting more compact urban forms close to existing or planned facilities to encourage more sustainable movement patterns and to reduce carbon emissions”
- A new objective, as per the following is recommended: “To ensure that patterns of development and transport are integrated in order ensure that new developments are conducive to public transport roll out and walking and cycling”.

- In addition, the Heritage Councils strongly support active travel, including strong commitments to the construction of cycle lanes, and adequate cycle parking in new developments for all uses.

Chapter 8 Environment, Water services and Climate Change

- There is comprehensive information in this section on waterbodies, groundwater and water quality. However, the issues detailed in the section are not matched by the necessary number of policies. While there are nine Water Protection Objectives, there are only two policies to help achieve them. As an example, the policy on supporting SUDs should be subsequently supported by a detailed requirement on SUD design in development proposals that includes reference to any relevant guidance.
- WPO7 details an objective on agriculture and intensive farming yet lacks detailed policy to achieve the objective. As an example, water impacts of this sector are largely outside the remit of the planning system, yet applications for slatted sheds are increasing, which are needed for storage of slurry during the non-spreading season but will eventually need to be emptied. There should be a policy that accounts for the development management considerations associated with agricultural buildings such as slatted sheds, within the context of water quality.
- There are no detailed development management policies for renewable energy. Whilst there are general “support” objectives, there does need to be greater tangibility for developers and communities in relation to the design and installation of renewables infrastructure. The Heritage Council supports renewables, as mitigating climate change is a matter of natural heritage importance. We would recommend that county development plans give greater clarity in policy drafting in terms of how renewables interact with built, cultural and natural heritage assets.

The Heritage Council believe the following are the keyways in which the planning system can aid climate action and recommend that these themes are adequately addressed in each section, if they have not been already.

- Ensure efficient use of land to reduce the built environment footprint and encourage non-vehicular transport modes.
- Avoid sites that have high ecological potential, informed by habitat mapping.
- Reuse of the embedded carbon in existing stock including vacant buildings.
- Ensure that brownfield sites and well-located sites within the urban boundary are preferred in a sequential approach to development.

We would also recommend to Monaghan County Council that any flood defence measures should be considered at the entire catchment level in the first instance. There is an opportunity to manage flood risk via nature-based solutions, whereby lands liable to flooding should be avoided in terms of development, while at the same time natural habitats should be allowed to replenish in these flood plains.

Flood plains should be the “low hanging fruit” for ecological restoration measures given their unsuitability for development. While it is recognised that in established urban areas, flood relief schemes may be needed; in the first instance, a whole river basin catchment approach to managing flooding should be pursued (as noted under actions 2D6 and 2D7 of the NBAP 2023- 2030). In this regard we strongly support Objective FRMO 4 in this section.

Chapter 9 – Strategic Objectives for Settlements

The Heritage Council welcomes the policies in this section on regeneration and compact growth. Proactive land activation in brownfield locations is needed. In addition, we note the natural and built

heritage policies in this section, and commend the commitment to identify further ACAs, as well as **Objective NBHO 3** to protect natural features. We would recommend that further Tree Preservation Orders be undertaken in settlements, given the important role stands of trees have for the character and natural heritage of towns.

Chapter 10 – Monaghan Town Settlement Plan

The Heritage Council funded the Monaghan Historic Towns Initiative Report, due to be finished in late 2024. This initiative is to develop a heritage-led regeneration plan for the town. Initial work has identified historic character areas, key issues and opportunities. Specific policies and actions will be identified, many of which provide good placemaking and design approaches, based on existing heritage which cannot be recreated and replicated.

It is noted that the Report on page 238, there are no objectives, nor detailed information on the heritage led regeneration plan, which should influence the future development trajectory of the town. This should be fully integrated into the Monaghan Historic Towns Initiative Report, in this chapter. This should not be conducted by a single policy seeking to implement, where appropriate, the heritage led regeneration plan but rather it should inform this entire chapter, as it touches on several different policy objectives.

Mapping and Zoning

The Heritage Council recommend that all nature conservation sites, including county biodiversity sites and pNHAs are fully illustrated and captured in the mapping that accompanies the plan. Similarly, ACAs, national monuments and the record of protected structures, landscape designations and county geological sites should also be made visible. This should be achieved via a GIS Layer with the information provided on the development management map viewer platform also. This is essential for both prescribed bodies and the public in general.

Strategic Environmental Assessment/Appropriate Assessment

The Heritage Council recommends that the SEA guidance prepared by the Office of the Planning Regulator (OPR) be consulted when preparing the SEA for the CDP. The relevant guidance on the Appropriate Assessment of Plans and Projects is also available from NPWS.

Conclusion

The Heritage Council strongly encourage Monaghan County Council to continue to acknowledge the primacy of the county's heritage resource. The built and natural heritage of the county should be the focus for guiding any future strategy. We recommend that this important heritage and character continues to guide a sustainable future development for Monaghan.

Chief Executive Response

Monaghan County Council recognises the importance of integrating heritage considerations into planning, having regard to national and local policies including:

- National Planning Framework (NPF)
- Development Plans – Guidelines for Local Planning Authorities
- The 4th edition of Ireland's National Biodiversity Action Plan (NBAP) 2023 –2030
- Heritage Ireland 2030
- The Guidelines for Planning Authorities on Architectural Heritage Protection
- The Northern and Western Regional Spatial & Economic Strategy 2020 - 2032

The Council notes the request for a standalone chapter recommended with clear objectives and policies for placemaking and design, suggesting the inclusion of policies for heritage-led regeneration,

quality public realm, and pedestrian-friendly and the suggested amendments to some sections of the written statement and mapping of nature sites.

The submission suggests the inclusion of additional policies and objectives and/or amendments to the following chapters:

- Chapter 2 – Core Strategy: Recommends amendments to ensure balanced development that protects heritage and environment.
- Chapter 6 – Heritage, Conservation and Landscape: Supports the identification and protection of natural heritage areas and proposes additional policies for ecological assessments and retention of natural features. Architectural Heritage: Stresses the importance of reusing and protecting heritage structures and suggests amendments to policies for better protection and reuse.
- Chapter 7 - Transport and Infrastructure: Advocates for sustainable transport systems and integration of development patterns with public transport and active travel.
- Chapter 8 - Environment, Water Services, and Climate Change: Calls for more detailed policies to support water protection and renewable energy, emphasizing the role of planning in climate action.
- Chapter 9 - Strategic Objectives for Settlements: Supports regeneration and compact growth, recommending further tree preservation orders and heritage-led regeneration.
- Chapter 10 - Monaghan Town Settlement Plan: Highlights the need to integrate the Monaghan Historic Towns Initiative Report into the plan.
- Mapping and Zoning - Recommends comprehensive mapping of nature conservation sites and heritage assets, such as biodiversity sites, pNHAs, national monuments, record of protected structures, landscape designations and county geological sites.
- Strategic Environmental Assessment/Appropriate Assessment - Stresses the need for thorough assessment of policies against SEA objectives.

Monaghan County Council fully endorses national and local policies which aim to protect and manage the County's natural and built heritage. The Council is committed to working with relevant agencies, communities and individuals to prioritise heritage in future development strategies and to ensure a rich cultural landscape, healthy environment and the full provision of ecosystems services in the County.

A Strategic Environmental Assessment to identify and evaluate the likely significant environmental effects of the implementation of the draft Plan was carried out by Fehily Timoney Consultants and is contained within Appendix 16 of the draft Development Plan. A summary of key interacting plans, policies and strategies and its relevance to the Monaghan County Development Plan have been provided in Appendix 1 of the SEA. The SEA process ensures that the Development Plan is aligned with higher-level plans, programmes and strategies, and accords with the relevant objectives and policy commitments contained within those plans.

Chapter 6 of the Monaghan County Development Plan 2025-2031 includes specific objectives and policies in relation to heritage, conservation and landscape while Section 15.3 of Chapter 15 sets out Development Management policies in relation to same. The Council will ensure the integration of heritage considerations into planning through the guidance set out throughout the Monaghan County Development Plan 2025-2031- as well as meeting the range of national commitments in relation to the protection of County Monaghan's heritage.

Chief Executive Recommendation

No amendment recommended.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-131</u>	Louth County Council	N/A	N/A

Summary of Submission & Issues Raised

- Louth County Council welcomes the opportunity to comment on the preparation of the Draft Monaghan County Development Plan 2025-2031 (the Draft Plan).
- Collaboration between the Louth County Development Plan and the Monaghan County Development Plan is essential for fostering cohesive regional growth and addressing shared Challenges.
- The submission notes that by aligning their development strategies, both counties can create a more integrated approach to land use, infrastructure, and public services, which enhances overall efficiency and effectiveness. This partnership can lead to improved transport planning, improved environmental management, and encourage economic development initiatives. Furthermore, a collaborative development plan can attract investment by presenting a unified vision to potential developers and stakeholders, ultimately promoting sustainable growth and enhancing the quality of life for residents in both Louth and Monaghan.
- The submission notes that the key aspects of the draft Plan 2025-2031 that directly interact with Louth are as follows:
 - The National Road Policy Objectives NRP1 - NRP8 recognise the important role that the national road network plays in connecting local and regional economies and communities within national and international markets and transport. Both Louth and Monaghan County Councils echoes support for the vital N2 upgrade
 - The Draft Plan echoes support for many active travel schemes including the Carrickmacross to Dundalk Greenway which is supported by the National Cycle Network and Louth County Development Plan 2021- 2027 as varied with policy objectives MOV33-38.
 - Strategic Regional Routes: The Plan identifies the N53 Castleblayney-Dundalk National Secondary Road, which links Castleblayney and Dundalk, enhancing connectivity between County Monaghan and County Louth.
 - East-West Route: The plan includes the East-West Route, which follows the R-178 through County Monaghan, connecting Dundalk to Sligo and passing through Carrickmacross, thereby improving connectivity between Monaghan and Louth.
 - Collaboration with Adjoining Local Authorities: The Plan emphasises working with adjoining local authorities, including Louth, to develop the Border Kingdoms route and the Lakelands Greenway.
 - Cross-Border Context: Monaghan County Council is a member of the East Border Region, which includes Louth, promoting cross-border cooperation and communication on regional development concerns.
 - Cycling and Walking Objectives: The Plan aims to collaborate with Louth to develop the Border Kingdoms route and the Lakelands Greenway.
 - Economic Influence of Carrickmacross: The Carrickmacross Town Settlement Plan highlights Carrickmacross' economic influence on a large rural hinterland, including Louth, and its strategic location near the M1 Motorway link at Ardee and proximity to Dundalk.

Chapter 1: Introduction

- The introduction of the Draft Plan outlines its purpose, scope, and associated legal framework.

Chapter 2: Core Strategy

- The Core Strategy aims to achieve sustainable, balanced development that supports economic growth, protects the environment, and enhances the quality of life for residents of County Monaghan

Chapter 3: Housing Strategy

- The Housing Strategy of the Monaghan County Development Plan 2025-2031 aims to ensure a balanced and adequate supply of housing that meets the diverse needs of the population, including families, single individuals, the elderly, and those with special needs. It emphasises sustainable development by promoting higher residential densities in urban areas, the reuse of vacant and derelict properties, and the regeneration of brownfield sites. The Strategy supports social inclusion through a mix of housing types and tenures, including social and affordable housing, and addresses the needs of specific groups such as the elderly, people with disabilities, and the Travelling Community. It highlights the importance of high-quality design, energy efficiency, and environmentally sustainable building practices. The Strategy also focuses on creating vibrant, inclusive communities with access to necessary amenities, public transport, and green spaces, ensuring a high quality of life for all residents. It integrates with broader planning objectives to support economic development, social inclusion, and environmental sustainability, contributing positively to the county's growth and development.

Chapter 4: Economic Development

- The Economic Development Chapter sets out a comprehensive framework to support economic growth, enhance competitiveness, and ensure the sustainable development of County Monaghan's economy. It aims to create a resilient and diversified economic base that provides opportunities for all residents and contributes to the overall prosperity of the county.

Chapter 5: Community

- The Community Chapter outlines a comprehensive approach to building inclusive, resilient, and thriving communities in County Monaghan.

Chapter 6: Heritage, Conservation and Landscape

- The Chapter emphasises the importance of protecting and enhancing Monaghan's natural and built heritage, landscapes, and biodiversity while promoting sustainable development and community engagement.

Chapter 7: Transport and Infrastructure

- Louth County Council welcomes the provision of National Roads Policy Objectives, in particular, NRP 2 'Subject to funding and approvals, to progress the projects in Table 7.3 in co-operation with TII and the relevant adjoining Local Authorities and NRP3 'To resist development that could add cost, complexity or prejudice the delivery of National Road projects listed in Table 7.3'. Submission notes that the 1-3 and 6-7 support the implementation of the N2 project
- The submission notes that the upgrade of the N2 from Ardee to Carrickmacross is a vital infrastructure project that will significantly improve connectivity between County Louth and County Monaghan, enhancing regional mobility, and supporting economic growth.
- This Chapter and the associated policy objectives support similar policy objectives in the Louth County Development Plan including policy objectives Mov 37, MOV 49, MOV 50, MOV 51
- Louth County Council welcomes the following regional roads policies:
 - RRP 1 To work collaboratively with other local authorities in the region to implement measures that can assist in delivering the objectives of the East-West route identified in the Northern and Western Regional Assembly's Regional Spatial and Economic Strategy 2020 – 2032.
 - RRP 2 To develop a Regional Road Intervention Strategy, using appropriate modelling and analysis (in collaboration with other agencies where appropriate) to identify priority sections for improvement.
 - RRP 3 To develop proposals to improve safety on Regional Routes, including road realignments and upgrades, road widening and verge widening, pavement improvement including drainage enhancement, junction upgrades, public lighting, provision for vulnerable road users, road boundary treatments and road safety measures. Funding and resources should be prioritised on the Regional Road

Intervention Strategy once developed. In the interim priority should be given to investment in Strategic Regional Routes, or at locations where specific issues have been identified.

- Additionally, Louth County Council welcomes the Plan's support for the NWRA RSES policy objectives 6.7, 6.8, 6.10 and 6.23 as the overlap with the EMRA policy objective PRO 8.10 *'The RSES supports appraisal and or delivery of the road projects set out in Table 8.4 subject to the outcome of appropriate environmental assessment and the planning process.'* Table 8.4 includes *'N2 Ardee to south of Castleblaney'*.

Chapter 8: Environment, Energy and Climate Change

- The Chapter emphasises the importance of protecting the environment, promoting sustainable development, and addressing climate change through comprehensive planning, community engagement, and the implementation of effective policies and measures.

Chapter 9: Strategic Objectives for Settlements

- Louth County Council particularly welcome policy objective *'SO 4 To realise the potential of County Monaghan in the context of its strategic location along the border, adjacent to the eastern economic corridor and to improve linkages and communications between County Monaghan and its neighbouring counties.'*

Chapters 10-14 Town Settlement Plans 2025-2031

- The Council welcomes the Plan's integration of the settlements geographical, economic and social ties with Louth, particularly the reiteration of border community co-operation, east-west transport links and associated planned infrastructure, the importance of the M1 Corridor and the economic relationship between towns in both counties particularly Carrickmacross and Castleblaney's relationship with Dundalk.
- The Council welcomes the provision of policy objective CMO 7 *'To undertake feasibility and viability studies regarding the options for potential relief roads around Carrickmacross Town, to include a review of the congestion at the junction of the Kingscourt Road and Dundalk Road, during the lifetime of this plan, subject to available resources.'*

Chapter 15: Development Management Standards

- The Chapter aims to balance development needs with environmental protection, community well-being, and sustainable growth

Chapter 16: Implementation and Monitoring

- The Chapter provide a structured yet flexible approach to implementing and monitoring the development plan, ensuring sustainable development and continuous improvement in County Monaghan.

Conclusion

- The submission notes that Louth County Council welcomes the inclusion of policies that support the delivery of key infrastructure projects, including the upgrade to the N2 and the Dundalk to Carrickmacross Greenway which represent significant opportunities for regional development, connectivity, and sustainable growth.
- The submission reiterates that Louth County Council is committed to continuing its collaborative efforts with Monaghan County Council to ensure the successful progression of these initiatives.

Chief Executive Response

The content of the submission received from Louth County Council is welcomed and noted. Monaghan County Council acknowledges that the Draft Development Plan aligns with many of the objectives and policies of the Louth County Development Plan 2021-2027 and notes the significant inter relationships between the two counties and the wider North East Region and Eastern Economic Corridor.

The Chief Executive recognises the importance of consulting and co-operating with adjoining Local Authorities as part of the plan making process and looks forward to continuing to work alongside Louth County Council to support and promote inter county connections.

Chief Executive Recommendation

No amendment recommended.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-132</u>	Fáilte Ireland	N/A	N/A

Summary of Submission & Issues Raised

1. The Objective of the Submission

- Fáilte Ireland has prepared this submission to support and assist Monaghan County Council in the formulation of planning policies and frameworks for the period 2025-2031.
- The submission seeks to enhance the policy coverage in the draft Development Plan to ensure a meaningful framework is established for the enhancement of tourism in the County, and the wider region, during the Plan period. It has been prepared with inputs from professional planners as well as various strands within Fáilte Ireland.
- The submission has been prepared having regard to the tourism profile of the County; the existing policy context in the draft Plan; and an established template for sustainable tourism policies being used by Fáilte Ireland to guide Planning Authorities.
- Fáilte Irelands framework for the enhancement of tourism in County Monaghan is identified in the Monaghan Destination Experience Development Plan and should be incorporated where possible in the new Monaghan County Development.

2. Commentary on the Draft Plan

- Fáilte Ireland welcomes the draft Plan particularly reference to co-ordination and linkages to relevant agencies such as Fáilte Ireland.
- Proposed information and statements are based on identified gaps in policy coverage and recommended good practice in the area of sustainable tourism.
- Welcome the opportunity to assist the County Council in the important area of policy preparation. Fáilte Ireland is acutely aware of the complex range of issues that a Development Plan must tackle. It is also mindful of both the responsibilities and limitations of the prevailing legislation and the role that the Development Plan plays in a statutory context.

3. Dedicated Tourism Chapter / Section

- Note that many of the topics raised in pre-draft submission have been included as policies, specifically policies TMO1-23, they are provided in a standalone table without explanatory text, context or dedicated supporting objectives.
- Submits that given the potential value of tourism to the County, economically, socially and culturally that the policies relating to tourism could be more strongly referenced throughout the draft Development Plan and in particular through the inclusion of a dedicated Tourism Chapter rather than its inclusion as limited short subsection of Chapter 4. This would ensure that all aspects of tourism policy are captured in a clear and robust manner within the Development Plan.
- The draft Plan contains dedicated tourism sections within each of the Settlement Plans, the reader of the Plan should be directed to these sections for more dedicated policies in respect of those areas.
- Similarly, the draft Plan has a number of supporting policies for Lough Muckno and the preparation of a Masterplan and Development Framework but is spread across a number of sections and chapters. A dedicated sub-section of the Tourism chapter would allow for a consolidated context and cross referencing to relevant sections.
- Such a chapter would allow for tourism policies and objectives to be clearly set out and where possible, should be illustrated through the inclusion of relevant maps in the Development Plan.
- The identification of the County's strategic tourism locations; transport routes; scenic routes and views; tourism attractions and facilities; and transportation hubs in the Development Plan

maps, serves as an effective tool to highlight the importance of tourism in the strategic planning of the County.

- This enables decision makers and stakeholders to easily follow guidance in relation to tourism amenities and assets. The chapter should:
 - (a) encompass all of the policies and objectives relating to this important economic driver, building on the actions and objectives set out in the wider Development Plan; and
 - (b) recognise the significant role that tourism plays in the overall operation and development of the County.

Submission includes a list of sections which could be included within the chapter, highlighting some of which may align and cross reference against existing sections of the draft plan:

- | | |
|---------------------------------|----------------------------------|
| • Accessible Tourism | • Major Attractions |
| • Activity & Adventure Tourism | • Fáilte Ireland Initiatives |
| • Greenways & Blueways | • Rural Tourism |
| • Ireland's Ancient East | • Urban Tourism |
| • Arts, Craft and Food Tourism | • Sustainable Tourism |
| • Business Tourism | • Visitor Accommodation |
| • Festivals and Events | • Tourism Amenities & Asset Maps |
| • Heritage and Cultural Tourism | |

A dedicated Tourism chapter should be structured in a manner that provides a clear framework for the future development of tourism in the county. This could be achieved by including text in respect of the relevant framework, i.e. alignment with National Tourism Policy, National Planning Framework and the Regional Spatial and Economic Strategy, Tourism development priorities applicable to Monaghan and alignment with Fáilte Ireland's plans and programmes.

Where the inclusion of a dedicated chapter is not considered by the Council it is considered that as a minimum the tourism section in Chapter 4 should be significantly enhanced and expanded to include the above sections.

4. Alignment with Fáilte Ireland Strategic Plans & Projects

Greater identification of existing and proposed enhancement plans and projects could be called out to ensure adequate policy support for these projects. The following should be referenced in a dedicated Tourism Chapter or an enhanced subsection.

Regional Tourism Development Strategies (RTDSs) & Ireland's Ancient East Regional Tourism Development Strategy 2023-2027.

- Fáilte Ireland have published a set of Regional Tourism Strategies for each of the four Regional Experience Brands. The purpose of the Regional Tourism Strategies is to identify the sustainable tourism development priorities that will help to unlock the commercial potential of the region bringing benefits to all stakeholders and industry.
- Each strategy has been prepared based on the VICE model which is a methodology for working towards sustainable tourism that seeks to strike an appropriate balance between the needs of the Visitor, the Industry and Community and the Environment.
- The strategies will be for the period to 2027 and will be grounded in Fáilte Ireland's new Corporate Strategy.
- While Ireland's Ancient East is referenced in Chapter 4, Policy TMO 1 its importance is referenced in relation to Monaghan Town and not the wider county. The section should be greater aligned with the Ireland's Ancient East Strategy, and its key objectives included in the Development Plan, to ensure a clear and consistent approach.

- Submission refers to the Ireland’s Ancient East Regional Tourism Strategy 2023-2027, as the primary reference document that informs this submission. While the Strategy is referenced in TMO 20 it is considered that a greater context and more specific objectives of the Strategy in relation to Monaghan could be brought into the Plan to support Policy TMO 20.

Monaghan Destination and Experience Development Plan (MDEDP)

- This is a five-year commercial destination and experience development plan. The role of the MDEDP is to support the development of unique and compelling destination experiences focused on a number of immediate and strategic destination opportunities. The MDEDP was developed through a consultative process involving tourism industry representatives, members of the local community and Monaghan County Council.
- The MDEDP is referenced in the draft Plan but not supported by a policy or objective. We request the inclusion of a new objective supporting the Monaghan Destination and Experience Development Plan (MDEDP) and the inclusion of policies and objectives to support its key projects.
- We wish to see an objective supporting continued collaboration with Fáilte Ireland and tourism stakeholders to ensure successful implementation and delivery of the plan. Vitally, the plan will be delivered in a way that encourages visitors to spend more time in an area, without compromising the environment or culture of the region.

Destination Towns

- Monaghan Town has been granted investment under Fáilte Irelands Destination Towns funding programme.
- The official opening of a Performance Space at Church Square, Co. Monaghan funded under Fáilte Ireland’s Destination Towns Scheme took place in October 2024.
- Submission notes the reference to the Monaghan Destination Town Plan on page 82 of the draft Plan and there is reference in TMO 1 however it is considered that the Development Plan could more robustly support the objectives of this plan including some inclusion of its main objectives.

Proposed amended Policy TMO 1: (underlined and in italics)

‘To promote and strengthen the development of tourist and cultural offerings in Monaghan Town, as set out in the *Monaghan Destination Town Plan, to help support its growth as an identified Destination Town, under the Fáilte Ireland’s Destination Town Funding, within Ireland’s Ancient East destination brand*’.

- Fáilte Ireland has published ‘*Development Guidelines for Tourism Destination Towns*’ to provide a framework to support communities and Local Authorities and set out the key drivers of what makes a town appealing to the domestic and overseas visitor.
- These guidelines are intended as a practical aid to Local Authorities, Chambers of Commerce, LEADER Programme Local Action Groups and other business and community groups who consider their town to either be a tourism destination town or have the potential to develop as one. They can also be used by smaller towns and villages with the potential to further develop as day trip destinations.
- These guidelines should be referenced within the Draft Development Plan.

Monaghan County Council Tourism Strategy 2023-2028

- Submission welcomes reference the Monaghan County Council Tourism Strategy 2023-2028 in Section 4.12 however it should be supported by a policy ensuring its delivery and also as its due to expire during the life of the Development Plan a commitment to the preparation of a new Plan. Some of the key policies and objectives should be set out more clearly in the draft Plan.

Proposed Policy:

'To promote and implement the policies and objective of the Monaghan County Council Tourism Strategy 2023-2028 and to ensure the preparation of a new Plan upon its expiry'.

- Submission notes Tourism Objective TMO 5 to support the development of angling tourism initiatives throughout the County and particularly at Lough Muckno, we recommend including a new objective which supports a Masterplan for Muckno estate in Castleblayney.

Proposed Policy:

'To support the development and implementation of a Masterplan for Muckno Estate in Castleblayney'.

Policy TMO2 – Towns & Villages

Requested that the following amendment to Policy TMO 2 be included:

Proposed amended Policy TMO 2: (underlined and in italics)

'To promote the development of destination hubs in towns and villages across County Monaghan and to develop community engagement strategies as a mechanism to assist in the delivery of this policy'.

Policy TMO19- Sliabh Beagh

It is requested that the following amendment to Policy TMO 19 be included:

'To promote and support Sliabh Beagh as an *eco-sustainable* tourism destination, in a manner which is consistent with the implementation of the objectives set out in the Sliabh Beagh Masterplan'.

5. Specific Comments on Other Chapters & Additional Suggested Text Insertions

Section 15.14 Farm Diversification

- Sustainable Tourism is a key consideration for visitors.
- Sustainable Tourism is the more appropriate term rather than eco/green tourism and as such the text in this section should be amended to reflect this.

Section 5.10 Cycling and Walking

Request the following amendment to Policy CFO15 (underlined and in italics):

To promote and facilitate the sustainable development of walkways, cycleways and recreational routes, *of various gradients to suit all levels of ability*, in appropriate locations throughout the County, in accordance with the objectives of the County Walking and Cycling Strategy 2021-2026 and any new or updated/subsequent version(s), having due regard to the relevant environmental considerations, including the need to protect and enhance biodiversity, prevent habitat fragmentation, and maintain and enhance ecological connectivity.

Section 10.11.3 Rossmore Forest Park

Request the following amendment to Policy MPO 21 (underlined and in italics):

'To encourage and facilitate the provision of appropriate and sensitive recreational development within Rossmore *Forest* Park *and provide a walking trail for a connection to Monaghan Town*'.

Renewable Energy & Landscape Character Assessment (LCA)

- It is the policy of Fáilte Ireland to support sustainable development, and we acknowledge that there is a requirement to provide for and develop renewable energy, at appropriate locations and in accordance with proper planning and sustainable development.
- As set out in our pre-draft submission Fáilte Ireland requests the Council develop a dedicated Renewable Energy Strategy. Included within this should be a map, which identifies areas suitable and unsuitable for the siting of wind turbines and sensitive areas such as tourism facilities or assets. Robust policies will assist the Council in ensuring a continued emphasis on the positive interactions between both the energy and tourism potential of the County.
- The LCA identified in the draft Development Plan was prepared in 2008 and it is considered that this should be reviewed and updated.
- While the draft Plan has referenced the National Landscape Strategy 2015-2025 no updated LCA for Monaghan has been prepared. This is considered critical to achieving protection for tourism assets from negative visual and landscape impacts.
- The Development Plan should revise Policy HCL06 to provide a commitment to a review of the LCA in the short term.

In concluding the submission welcomes the draft Development Plan and reiterates the commitment of Fáilte Ireland to working with the Council on achieving the Plan objectives over the coming years.

Chief Executive Response

The submission from Fáilte Ireland to the draft Monaghan County Development Plan 2025-2031 is welcomed. The detailed and comprehensive content of the submission are noted, and Monaghan County Council acknowledges the importance of working with Fáilte Ireland to support the growth of the tourism sector within the County. The submission makes a number of recommendations / requests which will now be responded to in turn.

Request No. 1: *Inclusion of a dedicated Tourism Chapter. Where the inclusion of a dedicated chapter is not considered by the Council it is considered that as a minimum the tourism section in Chapter 4 should be significantly enhanced and expanded.*

Chapter 4 Section 4.12 sets out the policies and objectives of the draft Development Plan with respect to Tourism, however it is important to note that sustainable tourism growth is supported through a number of related policies and objectives within other chapters of the draft County Development Plan. Whilst Tourism does not have its own chapter, it is considered that it is adequately covered within Economic Development and separately within each of the Settlement Plans. The policies and objectives of the draft Development Plan support a number of other Strategies and Plans produced by the Council which also have a role in supporting Tourism growth, including the Tourism Strategy and the Local Economic & Community Plan.

Request No.2: *The reader of the plan should be directed to tourism sections within each settlement plan for more dedicated policies.*

The draft Development Plan should be read in its entirety. Each of the settlements within the Plan adequately address Tourism which is supported by the text and objectives in Chapter 4, cross referencing between chapters is not required.

Request No.3: *Chapter 4, Policy TMO 1 should be greater aligned with the Ireland's Ancient East Strategy, and its key objectives included in the Development Plan, to ensure a clear and consistent approach.*

It is considered that Ireland's Ancient East Regional Tourism Development Strategy 2023-2027 is adequately covered under TMO 20, which is 'To support the implementation of Ireland's Ancient East

Regional Tourism Strategy 2023-2027 and to integrate its objectives into the promotion and development of tourism throughout the County' and demonstrates alignment with same.

Request No.4: *The inclusion of a new objective supporting the Monaghan Destination and Experience Development Plan (MDEDP) and the inclusion of policies and objective to support its key projects.*

It is accepted that there is a need to include a separate objective to support the implementation of the Monaghan Destination and Experience Development Plan. See below.

Request No.5: *Inclusion of an objective supporting continued collaboration with Fáilte Ireland and tourism stakeholders to ensure successful implementation and delivery of the plan. Vitrally, the plan will be delivered in a way that encourages visitors to spend more time in an area, without compromising the environment or culture of the region.*

An objective can be included within the draft Development Plan to support and encourage collaboration with Fáilte Ireland and tourism stakeholders.

Request No.6: *Proposed Amendment to Policy TMO 1*

Monaghan County Council Tourism Unit have reviewed the comment made by Fáilte Ireland, and in response have confirmed that reference to Fáilte Ireland's Destination Town Funding should not be included as this was a time limited funding programme. Policy TMO 1 shall be otherwise reviewed and amended in line with Fáilte Irelands comments in respect of the 'Destination Town'. See below.

Request No.7: *Inclusion of New Policy*

The comments made by Failte Ireland in respect of the Monaghan County Council Tourism Strategy 2023-2028 are noted. An additional tourism objective will be included within the draft Development Plan.

Request No.8: *Inclusion of a New Objective*

The recommendation made by Failte Ireland to include a new objective which supports a Masterplan for Muckno Estate in Castleblayney is noted. However, it is considered that this is adequately covered within the Settlement plan for Castleblayney specifically 'CBO10 – To prepare and implement a Masterplan and Development Framework for Lough Muckno and its environs which will act as a blueprint for its evolution as an exemplar recreational and amenity facility, having due regard to constraints and sensitivities associated with the area and relevant environmental protection requirements'.

Request No.9: *Proposed Amendment to Policy TMO 2*

The suggested amendment to Policy TMO 2 is noted and it is accepted that this wording would support this objective.

Request No.10 *Proposed Amendment to Policy TMO19*

The suggested amendment to objective TMO19, to include reference to Sliabh Beagh as a Sustainable Tourism Destination, as opposed to an eco-tourism destination, is noted. Draft Development Plan wording will be revised.

Request No.11: *Suggested amendment to Section 15.4 (Farm Diversification)*

Fáilte Irelands suggestion to refer to sustainable tourism, as opposed to eco/green tourism is noted. Draft Development Plan wording will be revised as appropriate.

Request No.12: *Suggested amendment to Section 5.10*

The comments and suggested amendment to Policy CFO 15 are noted. The inclusion of 'to suit all levels of ability' is acceptable, and this amendment will be proposed to be included in the Draft County

Development Plan. The proposed inclusion of the phrase ‘of various gradients to suit all levels of ability’ has been considered. Design standards and best practice will determine the appropriate gradients, and this proposal is not considered appropriate.

Request No.13: *Suggested amendment to Section 10.11.3*

The suggested additional text to objective MPO 21 is noted. Monaghan County Council Road Design section have noted that there are walking connections to Rossmore Park already. Section 10.11.3 wording will be amended taking account of Fáilte Ireland and Monaghan County Council Road Section comments.

Request No.14: *Request the Council to develop a dedicated Renewable Energy Strategy*

This recommendation has been addressed under Recommendation R13(i) of the OPR response.

Chief Executive Recommendations

The following additions and amendments are recommended in red text:

At Chapter 4, Economic Development, add in the following in red text at the Tourism objectives:

Tourism Objectives	
TMO 1	‘To promote and strengthen the development of tourist and cultural offerings in Monaghan Town, as set out in the Monaghan Destination Town Plan , to help support its growth as an identified Destination Town within Ireland’s Ancient East Destination brand’.
TMO 19	To promote and support Sliabh Beagh as an eco sustainable tourism destination, in a manner which is consistent with the implementation of the objective set out in the Sliabh Beagh Masterplan.
TMO 23	To promote and support the implementation of the Monaghan Destination and Experience Development Plan.
TMO 24	To promote and implement the policies and objective of the Monaghan County Council Tourism Strategy 2023-2028 and to ensure the preparation of a new Plan upon its expiry.

At Chapter 5, Community, add in the following in red text at objective CFO 15:

Cycling and Walking Objectives	
CFO 15	“To promote and facilitate the sustainable development of walkways, cycleways and recreational routes, to suit all levels of ability , in appropriate locations throughout the County, in accordance with the objectives of the County Walking and Cycling Strategy 2021-2026 and any new or updated/subsequent version(s), having due regard to relevant environmental considerations, including the need to protect and enhance biodiversity, prevent habitat fragmentation, and maintain and enhance ecological connectivity”.

At Chapter 10, Monaghan Town Settlement Plan add in the following in red text at objective MPO 21:

Monaghan Recreation, Amenity and Open Space Objectives	
MPO 21	“To encourage and facilitate the provision of appropriate and sensitive recreational development within Rossmore Forest Park and to enhance connections to Monaghan Town ”.

A proposed objective **LCO 5** has been included in the response to the OPR submission which broadly reflects the content of this submission in respect of the Landscape Character Assessment.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-134</u>	Dept of Housing, Local Government and Heritage- Archaeology	N/A	N/A

Summary of Submission & Issues Raised

The submission requests

- A stand-alone dedicated 'Archaeological Heritage' Chapter within the Plan.
- Objectives and policies to be considered for inclusion in 'Archaeological Heritage' Chapter of the Monaghan County Development Plan, unless deemed not to the Monaghan County Development Plan.

Archaeology

By way of background the specific legislation/regulations pertaining to the protection of archaeological monuments, sites and places, including underwater archaeological sites/wrecks/artefacts, are

- (1) The National Monuments (Amendment) Act 1930-2014.
 - The Historic Monument Viewer EV should be consulted for guidance in relation to the location of all known monuments within Co. Monaghan (whilst some monuments/places are not currently recorded within the RMP maps/manuals, the HEV provides a more complete and accurate record of the known historic monuments and places throughout Co. Monaghan.
 - MAP CLONES TOWN CDP2- Zone of archaeological importance map-the constraint area as outlined in the DAFT DEVELOPMENT PLAN for the zone of archaeological importance is incorrect. Please revert to the RMP number MO011-010--- for correct constraint area.
- (2) The Valetta Convention.
- (3) The Planning and Development Act 2000.
- (4) Framework and Principles for the Protection of the Archaeological Heritage.

Archaeological Heritage in Monaghan DP Overview

Recommended Over-Arching Objective.

It will be an objective of the planning authority to protect in an appropriate manner all elements of the archaeological heritage and other features of the following categories

- (a) Sites and monuments included in the Sites and Monuments Record as maintained by the National Monuments Service (NMS) of the Department of Housing, Local Government and Heritage (DHLGH).
- (b) Monuments and places included in the Record of Monuments and Places (RMP) as established under the National Monuments Acts.
- (c) Historic monuments and archaeological areas included in the Register of Historic Monuments as established under the National Monuments Acts.
- (d) National Monuments subject to Preservation Orders under the National Monuments Acts and National Monuments which are in the ownership or guardianship of the Minister for Housing, Local Government and Heritage or a local authority.
- (e) Archaeological objects within the meaning of the National Monuments Acts.
- (f) Wrecks protected under the National Monuments Acts or otherwise included in the Shipwreck Inventory maintained by the National Monuments Service of the Department of Housing, Local Government and Heritage.
- (g) Archaeological features not as yet identified but which may be impacted on by development.

Recommended Policies for inclusion in the Archaeological Heritage Chapter

The submission states that issues covered in the examples below should in any event be addressed, unless deemed not to the Monaghan DP.

Recommended Policies

- To protect and enhance archaeological monuments and historic wrecks and their settings and amenities, having particular regard to the importance of town defences, historic graveyards, national monuments in the ownership of the Minister or a local authority and, in general, monuments and historic wrecks which, through their presence in the landscape or seascape, provide tangible evidence of the past
- To promote and facilitate appropriate forms of access (including disabled access) to archaeological monuments and historic wrecks, including maintaining or developing means of access (including working with landowners to secure appropriate access over private lands), providing appropriate, accurate signage and interpretive material and providing appropriate forms of virtual access where physical access is not possible
- To ensure that all aspects of archaeological heritage and underwater cultural heritage, in all environments, are considered in the development process, including impacts on unidentified elements of the archaeological and underwater cultural heritage
- To promote knowledge and appreciation of archaeological and underwater cultural heritage and facilitate access to appropriate guidance regarding its protection and conservation, including at all stages of the development process (including pre-planning application consultations)
- To promote early and comprehensive public access to the results of archaeological excavations carried out as a result of development or conservation projects through publications and the provision of on-site interpretive material even where no physical remains are visible
- To support community initiatives and projects regarding preservation, presentation and access to archaeological heritage and underwater cultural heritage, provided such are compatible with appropriate conservation policies and standards, having regard to the guidance and advice of the Department of Housing, Local Government and Heritage

Recommended Specific Policies Archaeological Heritage Chapter

The submission states that specific policies covered in the examples below should in any event be addressed, unless deemed not to the Monaghan draft Plan.

Recommended specific objectives

- In general, developments will not be permitted which would result in the removal of archaeological monuments with above ground features/surface expression. Particularly in relation to archaeological monuments which form significant features in the landscape, whether or not visible from public spaces
- To secure the preservation in-situ of town defences of all forms
- To ensure that provision is made the planning process that allows for the preservation in-situ of significant medieval masonry remains found during the course of a development and (where practicable) the presentation of such remains should be as part of completed developments
- To secure the preservation in-situ of surviving above-ground urban medieval and 16th/17th century structures, by ensuring that permission for a development does not result in the loss of the remains of such structures which may survive within buildings which are, or appear to be, of later date
- To secure the preservation in-situ of significant examples of industrial or military heritage
- To secure the setting, character and amenity of historic battlefields
- To preserve the setting and amenity of all archaeological monuments, with particular regard for upstanding monuments and the line of town defences, by ensuring that development in

the vicinity of these archaeological monuments is not detrimental to their character or setting by reason of the development's location, scale, bulk or detailing. An appropriate buffer area in relation to the monument viz a viz the development may need to be established and maintained

- To preserve means of access to monuments currently accessible to the public and to develop further and better access to monuments, including as part of the design of development in their vicinity (where appropriate)
- To ensure a sufficient buffer area is maintained between a development and the line of town defences so as to preserve the amenity and lines of such defences
- To retain the existing street layout, historic building lines and traditional plot widths where these derive from medieval or earlier origins within towns or villages
- To ensure that landscapes of particular archaeological interest or significance are appropriately considered as part of a landscape character assessment, and to ensure the preservation of the character, interest and amenity of such landscapes
- To ensure that in appropriate cases developments include as a long-term feature appropriate interpretive material regarding the archaeological features identified or uncovered in the course of development or pre-development work, whether or not such features have been preserved in-situ or are themselves presented
- To ensure that all signage placed at or near archaeological monuments is appropriate in both form and accuracy of content
- To provide, in appropriate cases and subject to appropriate safeguards and restrictions, appropriate forms of public access (whether actual or virtual) to archaeological excavations taking place in advance of development
- To retain and manage appropriately archaeological monuments within open-space areas in or beside developments, ensuring that such monuments are subject to an appropriate and enforceable permanent management plan. They should be presented appropriately and should not be left vulnerable, whether in the immediate or longer term, to dangers to their physical integrity or possibility of loss of amenity

Recommended Development Control Policies and Objectives

The submission states that specific policies covered in the examples below should in any event be addressed, unless deemed not to the Monaghan draft Plan.

- The protection and promotion of the archaeological heritage of Co. Monaghan would be greatly facilitated by Monaghan County Council's engagement of their own archaeological professional. Whilst the DHLGH currently endeavours to provide as much archaeological advice as possible to Monaghan County Council (and to developers at pre-planning consultation stage), this should not be viewed as a substitute for a planning authority having its own in-house expertise. The DHLGH therefore strongly recommends that as a general objective, where there is no internal council expertise, that the council will endeavour to engage its' own County Archaeologist during the lifetime of this Development Plan.

Recommended Development Control Objectives and Policies

- That proposed developments which may, due to their location, size, or nature, are deemed to have impacts on the archaeological heritage be subject to an archaeological assessment, which should, where possible, be carried out before a planning decision. Such developments may include (1) those that are located at, or close to, archaeological sites or monuments or historic wrecks, (2) those which are extensive in terms of area (ground disturbance of 1/2 ha. or more) or length (1km or more) - even if there are no known archaeological heritage sites/features, (3) those which would affect significant areas of environments such as wetlands and underwater areas - even if there are no known archaeological heritage sites/features, and (4) any developments that require an EIS/EIAR.

- Consideration will be made to exclude basement developments in archaeologically sensitive areas, particularly in urban Zones of Archaeological Potential, in proximity to town defences and where there are buried waterlogged deposits.
- To ensure that all archaeological assessments are carried out in accordance with policies and standards, as set out in the Framework and Principles for the Protection of the Archaeological Heritage (Government of Ireland 1999) and the Policy and Guidelines on Archaeological Excavation (Government of Ireland 1999). All assessments shall include documentary research, cartographic and aerial photographic research and, where advised by this Department, geophysical survey and archaeological test excavations. Assessments may also include, in appropriate cases and as per advice from the Department, building surveys and assessments of upstanding structures to determine the extent to which they are, or contain within them, structures of medieval or 16th/17th century date.
- To ensure that all planning applications for developments/infrastructural projects, as highlighted above, are referred to the Department, through the Department's Development Applications Unit, that such referrals are submitted in due time and that full account is taken of the recommendations made by the Department.
- That permission for proposed developments will be refused where the development cannot be carried out in a manner compatible with the protection of the archaeological heritage.
- Where permission is granted for a proposed development that appropriate conditions are included that secure the protection of the archaeological heritage, either by preservation in-situ or, where impacts cannot be avoided, by preservation by record. In imposing such conditions, Monaghan County Council shall be guided in particular cases by the advice of the Department. Such conditions may require, as appropriate, archaeological assessment, building survey, geophysical survey, archaeological monitoring, archaeological test excavation, preservation in-situ, preservation-by-record or a combination of all seven elements.
- Where preservation in-situ is required, further conditions may require the appropriate immediate and long-term conservation and management of the archaeological features and long-term monitoring of the effectiveness of such measures, and appropriate steps may be required in the event that these measures are proving in-effective.
- Where preservation-by-record is required, the preparation of appropriate follow-up reports, analyses and publications will be necessary, and the conservation of any archaeological objects recovered will need expert advice in relation to their storage and conservation.
- Where permission is granted planning conditions may require the public presentation of archaeological features preserved in-situ and, where practicable, the provision of interpretive material at the site (including on a permanent basis). Presentation/signage may also be required where features no have been preserved in-situ in order to highlight the former presence of such features.
- Where archaeological excavation is required, further conditions may be imposed requiring the provision of public access to such excavations, subject to appropriate safeguards.
- Where planning conditions are imposed for the protection or preservation of the archaeological heritage, Monaghan County Council will make clear that the costs of implementing these are to be borne by the developer. The requirements expected of a developer/applicant in terms of archaeological mitigation should be specified. This may include highlighting the need to set aside an adequate timeframe/budget to facilitate any appropriate archaeological mitigation (e.g. excavations, enabling works, piling, post excavation analyses and/or reporting).
- To develop Monaghan County Council's own professional in-house archaeological expertise to advise on with planning submissions, including the drafting of future revisions of Monaghan draft Plan.

Additional policies in relation to development proposals

The Department recommends that the following be included in an appropriate section of Monaghan daft Plan (possibly in a section relating to open-spaces or to residential developments. Where a proposed development (excluding individual residential home units) includes a monument or site included in the RMP within the landholding proposed for development

- The developer shall commission an archaeological assessment to establish the extent of archaeological material associated with the monument or site. This assessment shall also include recommendations, for agreement with this Department and the planning authority, a buffer zone or area contiguous with the monument which will preserve the setting and visual amenity of the site.
- The area of the monument and buffer zone shall not be included as part of the open space requirement demanded of specific developments but shall be additional to the required open spaces.
- If a monument or place included in the RMP lies within the open-space of a development, a conservation plan for that monument should be requested as part of the landscape plan for that proposed open-space.
- Where the sub-surface remains of a monument or place that is included in the RMP lie within the proposed development site, there may be a requirement, as part of the development' landscaping proposals/conditions of planning, to establish a 'surface expression' that monument to highlight its' location within the development site.
- Should a monument or site included in the RMP be incorporated into a development, the monument and its' attendant buffer area shall be ceded to Local Authority Ownership once the development and associated landscaping works are completed so that the future protection of the monument can be assured.

Climate Change Adaptation for Built and Archaeological Heritage

It is strongly recommended that the policies and objectives outlined in the DHLGH Climate Change Sectoral Adaptation Plan for Built and Archaeological Heritage be considered for inclusion in the Monaghan Development Plan.

Recommended Climate-Change Policies and Objectives for Archaeological Heritage

- To promote awareness and the appropriate adaptation of Ireland's built and archaeological heritage to deal with the effects of climate change.
- To identify the built and archaeological heritage in local authority ownership and areas at risk from climate change including, but not necessarily restricted to, the Record of Monuments and Places, protected structures and architectural conservation areas designated in the development plan.
- To undertake climate change vulnerability assessments for the historic structures and sites in its area.
- To develop disaster risk reduction policies addressing direct and indirect risks to the built and archaeological heritage in its area.
- To develop resilience and adaptation strategies for the built and archaeological heritage in its area.
- To develop the skills capacity within the local authority to address adaptation/mitigation/emergency management issues affecting historic structures and sites in order to avoid inadvertent loss or damage in the course of climate change adaptation or mitigation works.

Recommended Polices for Underwater Archaeological Heritage and Historic Wrecks

- Wrecks that are 100 or more years old have full legal protection under the National Monuments Acts.

- They (along with archaeological objects) are automatically protected and generally do not feature in statutory listings (the Record of Monuments and Places and the Register of Historic Monuments).
- It is essential that appropriate objectives/policies are made that ensure the protection of Co. Monaghan's underwater cultural heritage in all its' forms (i.e. features additional to wrecks, like the remains of bridges and submerged, or partially submerged, riverine structures).
- An inventory of known historic wreck sites is available at www.archaeology.ie, but given the nature of the underwater environment there is always high potential for previously unknown archaeological features to be present and this needs to be reflected in the policies of Monaghan Development Plan. This also applies to areas formerly underwater, such as reclaimed lands.

Conclusion

The Department believes that the provision of this archaeological heritage guidance to Monaghan County Council in relation to the Monaghan draft Plan is key to ensuring proper planning and sustainable development within the area cover by the draft Plan - as well as meeting the range of international commitments Ireland has entered into. It is hoped that the above material has clearly set-out the archaeological heritage issues that need to be addressed within Monaghan draft Plan.

Chief Executive Response

The content of the submission from the Department of Housing, Local Government and Heritage in relation to 'Archaeological Heritage' is noted, with specific regard to the following

- legislation/regulations pertaining to the protection of archaeological monuments, sites and places, including underwater archaeological sites/wrecks/artefacts etc,
- definition of archaeology and archaeological heritage,
- recommended over-arching objective in MCDP,
- recommended specific and general policies,
- recommended development control policies and objectives,
- recommended climate change policies and objectives, and
- recommended policies for underwater archaeological heritage and historic wrecks.

The Council will have regard to the Built and Archaeological Heritage Climate Change Sectoral Adaptation Plan, 2019, in the objectives and policies throughout the Monaghan County Development Plan 2025-2031.

Chapter 6 of the Draft Development Plan 2025-2031 includes specific objectives and policies in Section 6.18 Archaeological Heritage, Section 6.19 Historic Houses and Designated Landscapes, Section 8.4 Climate Action and Chapter 15 Development Management in Section 15.3.3 Record of Monuments and Places and Section 15.3.4 Historic Houses, Demesnes and Designated Landscapes.

The Council will ensure the protection of the County's archaeological heritage through the guidance set out in Chapter 6, Chapter 8 and Chapter 15 of the Draft Development Plan- as well as meeting the range of international commitments Ireland has entered into.

Chief Executive Recommendation

No amendment recommended.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-139</u>	Dept of Environment, Climate and Communications	N/A	N/A

Summary of Submission & Issues Raised

- The Department requests MCC’s CDP to align with the Departments Statement of Strategy for the period 2024-2025, Le Chéile 25, which itself sets out the vision, mission, and six strategic goals in key policy areas.
- The Department also requests consideration of the framework of Agenda 2030, the Sustainable Development Goals (SDGs) and their respective targets, in the overall drafting of the Plan, and in relation to the specific areas outlined below.
 - Climate Action
 - Local Authority Climate Action Plan
 - Renewable Energy and Electricity Supply
 - Electricity Grid
 - Offshore Renewable Energy
 - Heat Energy
 - Circular Economy
 - Air Quality
 - Geoscience Policy
 - Telecommunications
 - Geological Survey Ireland
 - Geoheritage
 - Groundwater
 - Natural Resources (Minerals/Aggregates)

Climate Action

- Have regard to the Climate Action Plan 2024 (and any new or updated/subsequent versions during the lifetime of this Development Plan) and ensure that all policies are assessed against it to not unintentionally undermine the State’s long-term objectives. We suggest that this is incorporated into the SEA process.

Local Authority Climate Action Plan

Recommendation 1:

- The Department recommends that the Local Authority ensures that the draft CDP is aligned with the Monaghan County Council Climate Action Plan 2024-2029 (Monaghan LACAP). It is important that the relevant actions of the Monaghan LACAP are appropriately reflected in the policies and objectives of the draft CDP, thereby ensuring consistency and alignment between both Plans.

Recommendation 2:

- The Department recommends that the draft CDP include objectives and / or policies to ensure the implementation of DZ priority areas and related actions, thereby ensuring consistency and alignment between both Plans.

Renewable Energy and Electricity Supply

Recommendation 3:

- Include a specific time-bound commitment to adopt the Renewable Energy Strategy for County Monaghan within 12 months of whichever of the following two strategies is published first: i) the Regional Renewable Energy Strategy, ii) revised Methodology for Local Authority Renewable Energy Strategies (LARES).

- Include a specific objective of the Council to promote the repowering and extension of the lifetime of existing wind power installations and to enhance the development of additional renewable energy infrastructure in the County, including solar as well as supporting grid infrastructure.
- Amend section 8.2.6 and 15.17 by replacing the 2019 draft Guidelines with the existing 2006 Guidelines “or any update thereof”.
- Policy of the draft CDP which require the provision of at least one energy efficient measure in the design of all new developments is noted and supported by the Department Local renewable energy generation targets should be specific, measurable, and time bound in order to support the national renewable electricity generation target

Electricity Grid

- It is considered that the proposed wording of Section 15.20 and EGP 1 and 2, would not be in accordance with Government’s ‘Energy Security in Ireland to 2030’ report, published in November 2023. This report concludes that Ireland’s future energy will be secure by moving from a fossil fuel-based energy system to an electricity-led system, maximising renewable energy potential, flexibility and being integrated into Europe’s energy systems. Energy Security in Ireland to 2030, outlines a new strategy to ensure energy security in Ireland for this decade, while ensuring a sustainable transition to a carbon neutral energy system, by 2050. The proposed wording of Section 15.20 and EGP 1 and 2 would, as such, appear to explicitly resist critical state infrastructure and would be, therefore, contrary to stated Government policy.
- Furthermore, the proposed wording would be contrary to the provisions of the recast Renewable Energy Directive 2023/2413 (“RED III”), in particular section 16(f), which states (*inter alia*):
‘... the planning, construction and operation of renewable energy plants, the connection of such plants to the grid, the related grid itself, and storage assets are presumed as being in the overriding public interest and serving public health and safety’;

Recommendation 4:

- Policy of the Local Authority which restricts electricity infrastructure development should be removed from the draft CDP, in particular, EGP 1.
- Replace proposed EGP 1 with the following policy objective:
‘Protect the existing electricity and gas infrastructure and support the development of a safe, secure and reliable supply of electricity and gas infrastructure and the development of enhanced networks, as well as new transmission and distribution infrastructure, subject to the relevant environmental assessments’.

Offshore Renewable Energy

- The Department notes Monaghan has no coastline, however, any policies within the Monaghan County Development Plan should not undermine the objective of the National Marine Planning Framework, Policy Statement on the Framework for Ireland’s Offshore Electricity Transmission System, and both the Offshore Renewable Energy Development Plan and Offshore Renewable Energy Development Plan II.

HeatEnergy

Recommendation 5:

- Examine the potential of district heating in both existing and new developments, including district heating derived from waste heat, where available, technically feasible and cost effective and commit to carrying out a feasibility exercise and the use of heat mapping in support of same in the draft policies, having regard to the CAP24, RPO 4,20 of the NWRA RSES, NSO 9 of the NPF and the National Heat Study. As such, policies in support of same are

encouraged in the draft CDP. For example, consideration could be given the use of heat mapping to allow for the identification of local waste heat sources, in accordance with the Development Plan Guidelines Development Plans - Guidelines for Planning Authorities.

Circular Economy

- The Local Authority is required to include an objective for waste recovery and disposal facilities. Regional Waste Management Planning Office regarding development of the final plans in order to meet this objective under the Planning and Development Act 2000. With respect to the development of waste policy, County Councils should consult directly with their respective 2 Section 10(2)(b)(iii) Planning and Development Act 2000 (as amended)

Air Quality

- Have regard to the Clean Air Strategy for Ireland (Section 8.12 air quality), bearing in mind the impacts of measures adopted in the draft CDP on current and future air quality at www.airquality.ie.

Geoscience Policy

- Amend Section 8.2.9 Geothermal Energy to include policy which supports the development of geothermal energy in Monaghan, having regard to the Policy Statement on Geothermal Energy for a Circular Economy.

Telecommunications

- Include a direct reference in the draft CDP to supporting 5G rollout.
- Create a centralised telecoms unit in Monaghan County Council to manage all issues relating to telecoms, access to local authority assets and Smart Initiatives.
- Commit to efficiently process applications for required permits and licences to support the deployment of the National Broadband Plan deployment, and a commitment to work with operators to streamline and simplify the process.
- Commit to publish inventories of ducting and other assets owned by the State and develop a streamlined process to allow for easy accessibility for access seekers.

Conclusion

- It is requested that Monaghan County Council take these matters under consideration in the finalisation of the Monaghan County Development Plan 2025-2031.
- Department officials can make themselves available for a discussion on any matters raised in this submission or any other matters within the remit of the Department of Environment, Climate and Communications relevant to the preparation of this plan.
- Officials can provide support to the County Council in the following areas:
 - Climate Action, Engagement and Adaptation
 - Energy Generation and Networks
 - Energy Use / Demand in the Built Environment
 - The Circular Economy
 - Communications
 - Environmental Policy and Governance
 - Waste and Natural Resources (including geosciences)
 - UN Agenda 2030 and the Sustainable Development Goals (SDGs)

Geological Survey Ireland

- Geological Survey Ireland is the national earth science agency and is a division of the Department of the Environment, Climate and Communications that provides independent geological information and gather various data for that purpose.

- Use publicly available GSI data sets, when conducting the EIAR, SEA, planning and scoping processes.
- Geological Survey Ireland data should not be construed to support or object to the proposed development or plan-it can be used as independent scientific data in assessments, plans or policies, or provide baseline data or starting point for further site-specific assessments.

Geo-heritage

- List the five Geological Sites Policies in Section 6.12 'Geological Sites'.
- List the County Monaghan Geological Sites in Table 6.7.
- County Geological Sites, adopted in the National Heritage Plan, are often sites of high amenity or educational value, already zoned or listed in the plan. Listing in the CDP provides protection of the sites against potentially damaging developments that normally require planning permission, such as building, quarrying, landfilling or forestry. It is also important that the democratic process of public consultation and approval by councillors of the CDP means that stakeholders in the sites and all the local community can buy into the process.
- County Geological Sites are the optimal way of addressing the responsibility of each authority under the Planning and Development Act 2000 and its amendments, to protect sites of geological interest.

Groundwater

- GSI welcome use of GSI Groundwater Protection Scheme reports and Groundwater Vulnerability maps and data and under Section 8.1.3 'Groundwater Protection'.

Natural Resources (Minerals/Aggregates)

- Amend Section 15.18 'Extractive Industry' of the draft CDP, to include Geological Survey Ireland, 'Geological Heritage Guidelines for the Extractive Industry (2008)' with regard to quarrying and ancillary activities.

Chief Executive Response

The content of the submission from the Dept of Environment, Climate and Communications is noted, with specific regard to the following:

- Climate action
- Local Authority Climate Action Plan
- Renewable Energy and Electricity Supply
- Electricity Grid
- Offshore Renewable Energy
- Heat Energy
- Circular Economy
- Air Quality
- Geoscience Policy
- Telecommunications
- Geological Survey Ireland
- Geo-heritage
- Groundwater
- Natural Resources (Minerals/Aggregates)

Monaghan County Council will translate national policies into actions to help achieve the 17 Sustainable Development Goals set out the 2022-2024 Sustainable Development Goals (SDGs) National Implementation Plan.

The Council will ensure all policies are assessed against the Long-term Strategy on Greenhouse Gas Emissions Reductions to help achieve the States’ long-term objectives.

Chapter 8 Environment, Energy and Climate Change of the Draft Development Plan 2025-2031 includes specific objectives and policies throughout the Chapter which considers the recommendations of the Department of the Environment, Climate and Communications- as well as meeting the range of international commitments Ireland has entered into. In addition, Section 8.6 of the Development Plan includes Policy CAO 9 which supports district heating ‘To promote the connection of new development to district heating networks where such systems exist or can be developed’.

The Draft Development Plan 2025-2031 will also align with the Monaghan Local Authority Climate Action Plan and any specific policies therein relating to Monaghan Town Decarbonisation Zone will be reflected in Chapter 10 of the Development Plan Monaghan Town Settlement Plan 2025-2031.

Chief Executive Recommendations

The following proposed amended/new Objectives are recommended in Chapter 8 Environment, Energy and Climate Change:

Renewable Energy Objectives	
REO 10	Support the sustainable development, upgrading and maintenance of energy, generation, transmission, storage and distribution infrastructure, to ensure the security of energy supply and provide for future needs, as well as protection of the landscape, natural, archaeological and built heritage, and residential amenity.
REO 11	Support and facilitate proposals for secure, appropriately scaled energy storage systems and infrastructure, including green hydrogen gas storage which support energy efficiency and reusable energy systems, provided such proposals have regard for health and safety and accord with the principles of proper planning and sustainable development of the area.
REO 12	Support and facilitate proposals for hybrid energy systems and/or co-location of renewable energy where applicable where such development has satisfactorily demonstrated that it will not have adverse impacts on the surrounding environment.

A proposed amendment to policy **REO 2** has been included in the response to the OPR submission which broadly reflects the content of this submission.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-142</u>	The Department of Education	N/A	N/A

Summary of Submission & Issues Raised

- Any potential projected increase in school place requirements could be met by the expansion of the existing facilities, at primary level and post-primary level, in Monaghan, Carrickmacross, Castleblayney, Clones and Ballybay.
- Support the establishment of a Special Needs School in County Monaghan in the Development Plan, with potential location at an existing school campus.
- The Department of Education welcomes the draft Plan and notes that it encompasses all the main settlements in Monaghan County. The department notes the work undertaken by Monaghan County Council in reflecting on school needs for County Monaghan and anticipating emerging demographics in its various settlements. The anticipation of such demographics assists the department in identifying and planning for likely future educational requirements.
- It is noted that the plan provides for an increase in population to 71,516 people by 2031 compared with the 2016 level of 61,386. Census 2022 indicated a total population of 65,288 for the county. Therefore, the potential population increase from 2022-2031 is 6,228 persons.
- As referenced in the plan, there is currently a national trend whereby the numbers of young people nationally aged 0 -15 years are declining on an annual basis at present. This overall decline in numbers is feeding into a reduction in primary school enrolment levels which is forecasted to continue beyond the lifetime of this plan. This decline in enrolment levels could result in future increased availability of primary school places. Notwithstanding that, as Monaghan County Development Plan indicates, there will be areas of planned concentrated population growth which may necessitate either the expansion of existing primary schools or the provision of new schools. At post-primary level, enrolment levels remain currently on a small upward trajectory for the majority of the plan's lifetime. Thereafter, enrolment levels are projected to reduce, mirroring the current position at primary level.
- The department projects school place requirements based on current and future demographic trends. The department uses up-to-date data from a range of sources including school enrolments, Child Benefit data, information on residential development activity and National Planning Framework population targets in order to anticipate future school place needs.
- Where the data indicates that additional provision is required at primary or post primary level, the delivery of such provision is dependent on the particular circumstances of each case and may be provided through either one, or a combination of, the following:
 - Utilising existing unused capacity within a school (or schools),
 - Extending the capacity of a school (or schools)
 - Provision of a new school (or schools)
- There are currently 73 schools in Co. Monaghan (61 mainstream primary and 12 post-primary).
- In terms of future school place provision, the department notes the five settlements identified in the core strategy of the draft CDP and would like to make the following observations on them.

Monaghan Town

- The department notes that Monaghan Town is designated as a regional growth centre as per the RSES. The draft CDP notes that the population of Monaghan Town was 7,894 as per the 2022 Census. The draft Plan projects that the population of the town will reach a total of 9,197 by 2031, which is an increase of 1,303 persons. In the settlement of Monaghan itself, there

are 5 mainstream primary schools and 5 post-primary schools including 1 fee paying post primary school.

- At primary level, there is an indication of potential increased requirement for school places. It is of a level that could be met by the expansion of existing facilities. At post-primary level, there is a potential projected increase in school place requirements which could be met by the expansion of the existing facilities, if required.

Carrickmacross

- The draft CDP notes that the population of Carrickmacross was 5,745 as per the 2022 Census. The draft plan projects that the population of the town will reach a total of 6,687 by 2031, which is an increase of 942 persons. In the settlement of Carrickmacross itself, there are 3 mainstream primary schools and 3 post-primary schools.
- At primary level, there is an indication of potential increased requirement for school places. It is of a level that could be met by the expansion of existing facilities. At post primary level, there is a potential projected increase in school place requirements which could be met by the expansion of the existing facilities, if required.

Castleblayney

- The draft CDP notes that the population of Castleblayney was 3,926 as per the 2022 Census. The draft plan projects that the population of the town will reach a total of 4,531 by 2031, which is an increase of 605 persons. In the settlement of Castleblayney itself, there are 4 mainstream primary schools and 2 post-primary schools.
- At primary level, there is an indication of potential increased requirement for school places. It is of a level that could be met by the expansion of existing facilities. At post-primary level, there is a potential projected increase in school place requirements which could be met by the expansion of the existing facilities, if required.

Clones

- The draft CDP notes that the population of Clones was 1,885 as per the 2022 Census. The draft plan projects that the population of the town will reach a total of 2,168 by 2031, which is an increase of 283 persons. In the settlement of Clones itself, there are 2 mainstream primary schools and 1 post-primary school.
- At primary level, there is no anticipated requirement for additional capacity in Clones. At post primary level, there is no anticipated requirement for additional capacity in Clones.

Ballybay

- The draft CDP notes that the population of Ballybay was 1,329 as per the 2022 Census. The draft plan projects that the population of the town will reach a total of 1,510 by 2031, which is an increase of 181 persons. In the settlement of Clones itself, there are 2 mainstream primary schools and 1 post-primary school.
- At primary level, there is no anticipated requirement for additional capacity in Ballybay. At post primary level, there is no anticipated requirement for additional capacity in Ballybay.

Further observations:

- In assessing the implications for school requirements, account has been taken of underlying demographic trends, known information concerning projected growth (including the information provided in the draft plan) out to 2031, known information concerning existing school capacity and approved capital projects for individual schools. Based on all factors, a view has been formed concerning how future requirements can best be met at each settlement and commentary is provided in this regard.

- For the bulk of settlements, there will be a reliance on existing school facilities (or/and extensions of) to cater for the future educational needs of those settlements. The department notes the commitment in the draft Plan to adhere to the NPF objective of compact growth, urban renewal and the utilisation of re-generation sites. For this reason, the department needs to protect all existing school facilities for potential future longer-term school place requirements in established communities. In this regard, the department requests the inclusion of buffer zones and land-use designations that support education development adjacent to existing and established schools as these will be critical in meeting school accommodation requirements in existing built-up areas. In some instances, such provision may be the only viable solution for the provision of school places to meet local need.
- The department requests that the capacity of existing schools and any planned future schools, as published by the department, be considered as vital “supporting infrastructure and facilities” for the communities that they serve and that they are given high priority in Monaghan County Council’s assessment of the suitability of specific lands for residential development.
- Support for urban-design schools (where required) in established areas would be welcome. Measures to facilitate reduced requirements for on-site parking and set-down and to support access to off-site public amenities and facilities are essential to achieving the delivery of schools in the urban carbon-neutral model promoted in the NPF.
- Where there is a requirement to reserve a site for a new school or for the relocation of an existing school, the Department requests that the Council ensures that any new proposed site is appropriately zoned, suitably located and central to the community that the school will serve.

In examining the draft Plan further,

- The department notes and welcomes Educational Facilities Policy CFP 1 where the Council will restrict development adjoining existing public educational facilities which would hinder the planned future expansion of such facilities and any associated ancillary infrastructure.
- The department notes and welcomes Educational Facilities Policy CFP 2 where the Council will facilitate the implementation of the department’s school capital investment programme in line with the proper planning and sustainable development of the area and in compliance with the following, or any subsequent related publications, in terms of location, siting and design.
- The department notes and welcomes Cycling and Walking Objective CFO 19 noting that the Council will support the provision of safe routes between schools and surrounding residential areas to facilitate safe routes to schools, park and stride and other active travel initiatives. The department supports the development of sustainable travel links between schools and residential areas.
- In 2020, the department changed its name from “The Department of Education & Skills” to its current name of “The Department of Education”. Therefore, the department respectfully requests that any reference to its former name in the draft CDP be amended to its current name.
- In terms of assessing current and future capacity, the Department of Education has to be mindful of potential unforeseen circumstances such as the Ukrainian crisis, which have the ability to put undue pressure on school place provision and could necessitate reassessments of school place provision from time to time. The department will engage with the Council where the findings of an assessment require a review of existing or future school site provision within a specific location.

Special Education Provision

- On 18th October 2024, the Minister for Education announced plans to establish five new special schools in 2025 to cater for the increasing number of students with Special Educational Needs (SEN). One of these new special schools will be established in County Monaghan. The exact location for this school has yet to be determined. The department is exploring all options as to how it can best provide this facility. One of the options under consideration is the potential of locating this new school on a campus alongside an existing school facility. Having regard for this possibility, the department would urge the Council to show strong support in the Development Plan for special education needs provision at existing school facilities. In addition to this, the department also anticipates that further special class provision at both primary and post-primary level will be required in the future throughout the country and this may result in schools requiring additional accommodation to meet this growing need. Explicit support in the Development Plan for the provision of school accommodation for children and young people with special educational needs would be welcomed.

Conclusion

- In considering this draft Plan, the department wishes to thank Monaghan County Council for the consideration given to the department's submission to the Issues Paper in July 2023. The department is conscious of the context in which this draft plan has been produced. Since the adoption of the National Planning Framework (NPF) in 2018, the principle of compact growth has been embedded as a priority national strategic outcome combined with the intention to deliver on climate resilience and sustainable neighbourhoods. Monaghan County Council has embraced this principle in the draft Plan. In existing established settlements, intensification of development is planned accordingly. This submission to the draft CDP demonstrates the critical importance of protecting the existing educational infrastructure in such environments so that it can be purposed to meet future educational needs in established settlements of County Monaghan that will undergo further development.
- The department looks forward to continued co-operation and engagement with Monaghan County Council regarding school place provision within the County.

Chief Executive Response

There are currently 73 schools in County Monaghan (61 mainstream primary and 12 post-primary).

In relation to school place provision within the County, Monaghan County Council notes the following:

- Monaghan, Carrickmacross and Castleblayney: At both primary and post-primary levels, there is an indication of potential increased requirement for school places, which could be met by the expansion of the existing facilities, if required.
- Clones and Ballybay: At primary and post-primary levels, there is no anticipated requirement for additional capacity.

In relation to Special Education Provision, Monaghan County Council will support the establishment of a new special needs school in County Monaghan, in the Development Plan, and its potential location at existing school facilities.

The Council will continue to consult and are open to further engagement with the Department of Education regarding any reassessments of school place provision that may arise from time to time (such as Ukrainian crises) and all wider matters in relation to the provision of educational facilities.

Chapter 5 titled 'Community' of the Draft Development Plan 2025-2031 includes specific objectives and policies in Section 5.4 'Educational Facilities' which considers the recommendations of the

Department of Education that are consistent with the relevant current suite of Department of Education, Technical Guidance Documents and school design guides.

Chief Executive Recommendation

It is recommended that the department name is changed from “The Department of Education & Skills” to its current name of “The Department of Education”.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-143</u>	Armagh City, Banbridge and Craigavon Borough Council	N/A	N/A

Summary of Submission & Issues Raised

Armagh City, Banbridge and Craigavon Borough Council consider the main issues of shared cross boundary interest to be:

Environmental Designations

- There are several environmental designations and environmental assets within ACBC Borough, which are either close or adjacent to the border with County Monaghan namely, Tynan Abbey, Tullybrick Lough, Knockbane Bog, Tullynowood Lake and Drumcarn Area of Special Scientific Interest.
- Submission welcomes the approach set out in Heritage, Conservation and Landscape Objective HCLO 7, which aims to co-operate with adjoining local authorities north and south of the border to ensure that the natural environment is maintained in a sustainable manner, to encourage a collaborative and consistent policy approach with adjoining areas on matters of environmental and landscape protection and to identify threats to the integrity of such sites through a transboundary approach.

Transportation

- Submission notes Cross Border Strategic Objective BRO 1.
- It is noted that the draft Plan recognises the N12 National Primary Road as an important transport corridor for traffic between Northern Ireland and the west of Ireland.
- Notes the potential for a link road from the N12 (Armagh Road) to the N2 Monaghan by-pass which would provide linkages to the A5 - N2 Londonderry/Derry to Dublin Road, further enhancing connectivity.
- Submission welcomes a co-ordinated approach towards the development of Green Infrastructure and supports the development of the Ulster Canal as a Greenway and the proposals for the development of a long-distance Ulster Canal Greenway Network.
- Submission notes that this will be in partnership with Waterways Ireland, Armagh City, Banbridge and Craigavon Borough Council, Cavan County Council, Fermanagh and Omagh District Council and Mid Ulster District Council.
- Submission also notes that Phase 2 of the Ulster Canal Greenway (Monaghan to Northern Ireland Border) is scheduled for completion in 2025, with Phase 3 (Clones to Monaghan) scheduled for completion in 2027.
- Submission welcomes the draft Plan's approach towards active travel, including Cycling and Walking Objective CFO 17.
- Active Travel and Recreational Walking and Cycling Policy ATP 8 is also welcomed, noting this is of particular relevance given there may be future potential to expand the Ulster Canal Greenway to provide linkage from Middletown to the border which would enhance connectivity and active travel linkages between respective Council areas.
- Recreation, Parks and Public Open Spaces Objective CFO 20, which seeks to protect established/historic railway corridors and other disused transport infrastructure routes throughout the County is also noted and welcomed. The Draft Plan proposes that 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. This objective is generally consistent with Armagh City, Banbridge and Craigavon Borough Council's approach towards this matter and is

of particular importance given that a number of disused railway corridors straddle both council areas.

Sustainable Tourism

- In terms of the draft Plans approach towards sustainable tourism, the submission notes and welcomes Tourism Objective TUO 4 which aims to promote and develop improved cross border networks to encourage tourism and business to operate in both Northern Ireland and the Republic of Ireland.
- Tourism Objective 17, which proposes working in conjunction with adjoining local authorities to extend and design new walking and cycling routes that will promote sustainable tourism development, is welcomed in particular.
- Tourism Objective TMO 6 aims to support the reopening of the Ulster Canal. Armagh City, Banbridge and Craigavon Borough Council would support the re-opening of the Ulster Canal given its potential benefit to tourism, cross border connections and the economy.

Chief Executive Response

The comments in relation to the main issues of shared cross boundary interest, are noted. The importance of cross-boundary workings with adjoining local authorities is recognised by Monaghan County Council, and as such we will continue to engage with Armagh City, Banbridge and Craigavon Borough Council during the development plan process.

Chief Executive Recommendation

No amendment required.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-145</u>	EirGrid	N/A	N/A

Summary of Submission & Issues Raised

- The submission appreciates that Monaghan County Council understands the need for development of the transmission grid as an integral part of meeting the Government target of 80% of Ireland’s energy coming from renewable sources by 2030.
- The submission notes that in addition to the environmental benefits, grid development will ensure security of supply, attract investment, help to meet increasing local transport, employment and housing requirements, apply downward pressure of the costs of electricity, and deliver community benefits in the areas that facilitate the project infrastructure.
- The submission notes that many EirGrid projects comprise improvements to existing infrastructure, with only 10% of projects in the Northern and Western Regional Assembly area involving new circuits. Where new circuits are required, however EirGrid is committed to ensuring that all grid development projects are the overall best performing option and are assessed against five key assessment criteria: economic, technical, deliverability, socio-economics, and environment.
- Additionally, the submission notes that multiple rounds of consultation will be undertaken with affected landowners, the public, and statutory bodies and any decision on the selection of underground or overhead is based on the five key assessment criteria and we will assess all reasonable alternatives in-line with legislation.
- The submission states that the proposed text in Section 15.20 of the Draft Development Plan would not necessarily allow EirGrid to deliver the improvements that are needed to the transmission grid and would not facilitate the accelerated delivery that is required to meet the 2030 target of 80% renewable energy.
- Specifically, the submission states that points a-f of Section 15.20 use the subjective term “adverse impact” to limit the development of infrastructure and notes that works of any nature may have an adverse impact, for instance an adverse impact on the visual amenity of an area could result from the construction of a house or the installation of a new, necessary traffic light.
- The submission notes that whilst points a-f are important consideration which EirGrid does consider in relation to its projects, there should be an assessment of the significance of the effects of a development proposal, and whether any residual adverse effects (post-mitigation) are outweighed by the benefits and/or need for the project.
- Additionally, the submission suggests that the term ‘Planning Applications’ should be used as opposed to ‘proposals’ given that there may be circumstances where infrastructure development comprises exempted development, which are governed by the provisions of the Planning and Development Act 2000 (as amended), and associated Regulations.
- EirGrid suggests the following amendments:

Current Wording

Proposals for electricity and gas infrastructure development and any ancillary development shall be resisted where there is:

- a) An adverse impact by the proposal on the visual amenities of the area and surrounding landscape.
- b) An adverse impact by the proposal on the residential amenities of the area.
- c) A cumulative adverse visual impact when considered with other similar projects across the local landscape.
- d) An adverse visual impact by the proposal upon areas of primary and secondary amenity, scenic routes, and any other designated scenic landscapes.

- e) An adverse impact by the proposal on nature conservation, ecology, soil, hydrology, groundwater, archaeology, built heritage, and public rights of way.
- f) An adverse impact by the proposal on the road network in the area.

Proposed Wording

~~Proposals~~ Planning applications for electricity and gas infrastructure development and any ancillary development ~~shall be resisted where there is:~~ must demonstrate consideration of the factors listed in points a-f below. There must be an assessment of the likelihood and significance of residual effects, and any potential significant effects must be avoided or minimised through location, design, and mitigation. Any residual significant effects will be weighed against the need and benefits of the development, and its local, regional and National planning policy context, before consent is granted.

Proposals for electricity and gas infrastructure and any ancillary development must consider the residual significant effects of (inter-alia):

- a) ~~An adverse impact by~~ The impact of the proposal ~~to~~ on the visual amenities of the area and surrounding landscapes.
- b) ~~An adverse impact by~~ The impact of the proposal on the residential amenities of the area.
- c) A The cumulative visual impacts when ~~considered with~~ considering other similar projects across the local landscape.
- d) ~~An adverse visual impact by~~ The impact of the proposal upon areas of primary and secondary amenity, ~~scenic~~ secondary routes and other designated ~~scenic~~ landscapes.
- e) ~~An adverse impact by~~ The impact of the proposal on nature conservation, ecology, soil, hydrology, groundwater, archaeology, built heritage, and the rights of public way.
- f) ~~An adverse impact by~~ The effect of the proposal on the road network in the area.

Current Wording

It is a policy of the Council to facilitate development involving electricity and gas infrastructure, provided that it does not detrimentally impact on the natural or man made environment or on the character of its setting.

Proposed Wording

It is a policy of the Council to facilitate development ~~involving~~ and construction of electricity and gas infrastructure, provided that it does not ~~detrimentally impact~~ have a demonstrated significant effect on the natural or man made environment or on the character of its setting, unless the overriding benefits of need for the project, and its supporting policy context, can be clearly demonstrated.

- Submission also requests that the wording of Policy EGP2 is amended as follows:
 “The undergrounding of new electricity transmission ~~lines~~ circuits must be considered ~~in the first instance~~, as part of a detailed consideration and evaluation of all options available in delivering and providing this type of infrastructure. The development shall be consistent with national and international best practice with regard to materials and technologies that will ensure a safe, secure, reliable, economic, efficient and high-quality network, and mitigation measures shall be provided where the impacts are inevitable.”

Chief Executive Response

Section 15.20 within Chapter 15 Development Management Standards advocates that the development of a secure and reliable electricity transmission/distribution infrastructure is a key factor for supporting economic development and attracting investment into an area. This section also highlights the importance of gas as an energy supply for industry, and potentially for residential properties. The need to accommodate electricity and gas infrastructure, just like any other type of development, must be balanced against a requirement to protect the environment and other

acknowledged interests of public importance. It is a policy of the Council to facilitate development involving electricity and gas infrastructure, provided that it does not detrimentally impact on the natural or man-made environment or on the character of its setting. The six assessment criteria (a-f) set out in Section 15.20 are considered reasonable, are based on sound planning principles, and are applicable elsewhere throughout the County Development Plan. On this basis these criteria merely reiterate what is contained within the remainder of the Development Plan and do not introduce any specific or additional policy tests for electricity and gas infrastructure.

The submission notes that the word 'proposals' should be replaced with 'planning applications' as there may be circumstances where infrastructure development comprises exempted development. Proposals which are considered to constitute exempted development are listed within the Planning and Development Regulations 2001 (as amended) and would be assessed against the Regulations accordingly and not the provisions of the County Development Plan.

The submission requests amendments to Policy EPG2 and in particular the omission of the wording 'in the first instance'. Policy EGP 2 does not prohibit the provision of electricity transmission infrastructure, nor does it explicitly require that electricity transmission infrastructure may only be provided by underground means. This policy requires that the developer considers the potential to deliver this infrastructure by underground means, as part of a detailed consideration and evaluation of all options available in delivering and providing this type of infrastructure before proposing overhead infrastructure. This method of assessing alternatives is a means of determining the most appropriate and sustainable form of delivering development. Furthermore, the latter half of this policy acknowledges the need for a safe, secure, reliable, economic, efficient and high-quality network, and in requiring the provision of mitigation measures accepts that impacts from the provision of this type of strategic infrastructure may be inevitable.

The submission also seeks that the word circuits is inserted into policy EPG2. However, it is considered that circuits only represent a specific element of electricity transmission, and the wording of the existing policy is therefore considered appropriate.

Chief Executive Recommendation

No amendment recommended.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-148</u>	An Taisce	N/A	N/A

Summary of Submission & Issues Raised

The submission relates to a number of areas including Climate and Biodiversity Emergencies, Sustainable Settlement, Economic Development, Community, Heritage, Conservation and Landscape, Transport and Infrastructure, Environment, Energy and Climate change, Strategic Environmental Assessment and Implementation and Monitoring.

Overarching comments:

The Draft CDP should represent a catalyst for positive change and facilitate the development of the county in a plan-led sustainable manner. The CDP should strive to establish a coherent framework for the coordinated sustainable economic, social, cultural and environmental development in the county in line with the UN Sustainable Development Goals (SDGs). A number of An Taisce's key objectives of the submission include:

- Ensuring climate and biodiversity loss emergencies are addressed at all levels of planning and development,
- Reducing's Ireland's fossil fuel use and greenhouse gas emissions in accordance with national and EU law,
- Ensuring that European, national, regional and local policy and guidelines are implemented,
- Protecting town centres, and avoiding un-serviced development and sprawl,
- Promoting compact development served by public transport,
- Promoting rapid and extensive shifts toward walking and cycling and away from private car use,
- Ensuring the implementation of EU environmental law and protecting habitats and biodiversity, particularly Natura 2000 sites,
- Protecting our water bodies and water quality, including through the prevention of inappropriate development,
- Conserving the quality of the Irish landscape, archaeological monuments and built heritage, particularly protected structures,
- Promoting efficient investment in public infrastructure and services, and
- Promoting local self-reliance, public health and quality of life.

Addressing the Climate and Biodiversity Emergencies

Climate Breakdown:

The submission contends that climate change both profoundly impacts and is profoundly impacted by all areas of planning and development. It is imperative the CDP takes a lead role in delivering equitable transition to a decarbonised society. The increased emphasis on climate mitigation and adaptation in the Draft is welcomed.

The submission considers that no Strategic Objective on climate is a major omission, the scale of the climate crisis and the extent to which it is influenced by planning warrants a standalone Strategic Objective on mitigating and adapting to climate change.

Legally binding climate obligations and level of ambition needed:

The draft CDP outlines EU and national climate related legislation but does not anywhere discuss the legally binding obligations.

The submission considers that as per the Climate Act, it is on-time compliance with all carbon budget tonnages that is legally binding, not 2030 targets of the Act that frames Ireland’s legally binding climate ambition to deliver a reduction in greenhouse gas emissions by 51% by 2030. The reduction of 51% by 2030 compared to a 2018 baseline was the benchmark that the Climate Change Advisory Council was required to use to set the first two carbon budget levels. Once those were set and agreed by Government, the obligation to consider the 51% reduction by 2030 was discharged – compliance with each carbon budget is the legal obligation now.

The projected overshoots of Carbon Budget 1 (2021-2025) and Budget 2 (2026-2030) mean that the actual emissions reduction by 2030 will in all likelihood be substantially higher than the often cited 51%. Significant implications for increased level of ambition needed in the new CDP to ensure that planning and development allows, supports, and facilitates compliance with carbon budgets.

Climate Act Obligations on Public Authorities:

In finalisation of the CDP, compliance with Section 15 and other Climate Act obligations needs to be demonstrated. Details requirements of Section 15(1) of the 2015 Act in terms of public authorities, in so far as practicable, performing its functions in a manner consistent with the Act.

Climate in the Draft Plan:

The submission considers there to be a significant and fundamental failure throughout the Draft to:

- a. Reconcile the plan with the requirements of the carbon budgets and the Climate Action Plan
- b. Fully integrate this, and consideration of climate more broadly, throughout the Draft.

While many objectives and policies do further climate action, An Taisce strongly recommend the CDP significantly improve its explicit integration of climate action throughout. Section 8.6 discusses the integration of climate in the Draft, but the main body of text focuses on adaptation. This is of course essential, but mitigation should be given at least equal weight.

The submission notes Tables 8.8 and 8.9 how mitigation and adaptation measures are covered under various other sections of the plan. An Taisce however recommends that each chapter be directly assessed against the obligations under the Climate Act, specifically the legally binding carbon budgets, as well as against the policies and actions in the current Climate Action Plan. Many of the Climate Action objectives are very welcome, including CAO 3, however, there are no targets provided and no consideration of the very high level of ambition needed to meet carbon budgets.

The submission notes that Longford CDP provides e.g. of climate integration throughout the plan. Each chapter contains a climate context section with climate specific objectives. An Taisce recommends a similar approach be added but also incorporating evaluation of the plan and its objectives against carbon budget obligations and the current Climate Action Plan.

Just Transition:

The submission recommends that Just Transition principles be much more thoroughly and explicitly integrated into the Plan. The Draft only mentions Just Transition in respect of public transport access.

Protecting Biodiversity and Restoring Nature:

While there are objectives aimed at ecological protection, An Taisce does not consider the Draft as a whole has adequately addressed the urgency and scale of the biodiversity loss crisis and recommends a Strategic Objective on biodiversity protection and nature restoration be included.

Sustainable Settlement:

The submission notes the sprawling, uncoordinated nature where land has been developed in a leapfrog, low-density pattern, with resultant diminished liveability, lacking public facilities, generated

car dependency for long commutes. To achieve more compact and sustainable settlement patterns, requires investment in public transport, walking and cycling, high-quality urban design, housing options, public realm, easy access to services, while breaking the dependence on private car and addressing emissions obligations. An Taisce welcomes commitments throughout the Plan to support sustainable compact development.

The submission proposed the consideration of policies directing new residential development to existing settlements and criteria for limiting one-off housing with a demonstrated need should be as robust as possible as well as fully implemented and enforced. In addition, to address compact settlement creation, An Taisce recommends the seven location test standards for new housing (National Spatial Strategy 2002) as a mandatory CDP requirement.

An Taisce welcomes objectives of the CDP aimed at directing further development of rural dwellings to existing settlements. An Taisce also note the proportion of one-offs in Monaghan has decreased from 2018 – 2022. However, the Plan requires additional detail to effectively curtail unsustainable spread of one-offs. The submission notes section 15.9.1 as regards threshold considerations for the no. of buildings that can be accommodated, yet there is no actual specific framework set for determining that threshold and recommends this be substantially elaborated on in the final plan.

Reconciling Construction with Climate Obligations:

The submission contends the Draft CDP has no reference to mandatory life-cycle carbon measurement or mandatory measurement of embodied carbon in construction, which are needed to drive material changes in what we build and how we build it.

An Taisce welcomes objective CAO 12 to promote retrofitting of existing building stock, however, would emphasise need to prioritise social housing, noting the current retrofitting regime lacks emphasis on low-income households, impacting on realisation of just and fair energy transition. Also, An Taisce recommends seeking a commitment to ending installation of fossil oil and gas boilers in houses, in favour of low-carbon alternatives.

Economic Development

Agriculture:

The submission notes that intensive agriculture has adverse impacts including to water quality, air, climate, and biodiversity. Therefore, the CDP should contain stronger objectives to promote environmentally sustainable and economically viable agriculture.

The submission proposes that objectives should be included to;

- Ensure evaluation of agricultural proposals, including impacts from facilitating the proposal (e.g. slurry spreading).
- To require compliance with River Basin Management Plans as well as the use of catchment sensitive farming practices. Compliance with the Habitats, Birds, Water Framework and Nitrates Directives is also key.
- Recommends the enhancement of objective AGFO 1 to include promotion of production of vegetables, grains, nuts, pulses, fruits, etc., to contribute to food security.

In respect of AGFO 2, the current measures in place under guidelines are not serving to sufficiently mitigate water quality deterioration as a result of agriculture, evidenced by EPA water quality assessments. Therefore, it is recommended that an objective is also required in respect of compliance with obligations under the Water Framework Directive, specifically Article 4 (see section 8.1 of this submission for further detail).

An Taisce advocates for objectives seeking a just transition of a portion of agricultural land towards High Nature Value farmland (HNVf), to allow for wider range of benefits from agriculture, allowing for continued production of food and fibre while securing storage, flood alleviation, water filtration and space for nature. The CDP should take account of the 3 types of HNVf.

Forestry:

The submission recommends an objective to move towards a Continuous Cover Forest (CCF) management system that prioritises native species, that allows for the three pillars of sustainability (social, economic and environmental) to be more equitably secured. CCF is a more ecologically advantageous alternative to current State model of clear felling and replanting and establishing diverse permanent forest stands benefits carbon sequestration which is an urgent land-use measure.

Extractive Industry:

The submission contends that Objective MEO 1 should be amended to require strict enforcement against unauthorised development and enforcement of conditions applied to permitted quarry development. The submission also considers that section 35 of the Planning and Development Act 2000 (as amended) regarding past failures to comply should be rigorously applied to proposals for continued or expanding quarry operations.

Tourism:

An Taisce submits that future tourism development should be as car-free as possible. A new tourist model is required based on longer-based stays accommodated in locations to a level commensurate with the capacity of the hist environment. The submission welcomes TMO 17 to extend walking and cycling routes for tourism and also welcomes the support for the concept of slower, place-based tourism. There is still a need to better integrate sustainable transport integration with tourism.

An Taisce welcomes TMO 18 recognising that tourism growth must be balanced with protecting the environment, and recommends this objective also considers climate impacts and ensures compliance with the Habitats and Birds Directive.

Community:

The submission welcomes cycling and walking objectives in Community chapter, particularly CFO 19 (safe routes to schools). The submission recommends an additional objective to expand consideration of pedestrian and cycle access to community facilities beyond education.

Heritage, Conservation and Landscape

Built Heritage:

The submission contends that the CDP needs to be informed by the National Landscape Character Assessment, the National Inventory of Architectural Heritage, and the associated inventory of Historic Gardens and Designed Landscapes in considering preferred location for infrastructure, urban expansion and other development. Alignment of CDP with Valletta Convention and other international conventions for protection of archaeology and cultural landscape needs to be ensured. Land use policy needs to give explicit consideration to potential impacts on the setting of Protected Structures and ACA in urban areas, to historic gardens and designed landscapes particularly where providing the setting of major country houses, and to the historic and cultural environment generally.

Protected Structures and Endangerment:

The submission notes the ongoing issue of endangerment of heritage buildings and Protected Structures. The CDP should include consideration of this alongside its welcome consideration of adaptive reuse. Chapter 6 should be amended to include policies for monitoring buildings at risk and using provisions of Section 59 of the Planning Act to serve notices of endangerment.

Built Heritage and Climate Change:

An Taisce welcomes objective PMPO 4 to undertake vulnerability assessments of built and archaeological heritage in MCC ownership.

Trees, Hedgerows and Woodlands:

An Taisce recommends strengthening of policy TWP 1 to ensure that supplementary planting of native tree species is a *requirement* rather than a *consideration* in circumstances where removal of development site biodiversity is unavoidable.

The submission raises concerns over non-compliance with and lack of prosecutions under the Wildlife Act with unlawful removal of vegetation from March to end of August. While legal enforcement lies with NPWS and Gardai, An Taisce recommends the CDP includes mention of illegal cutting issue. And that the Council ensure any cutting it engages in itself is done in the most biodiversity friendly manner.

Wetlands:

An Taisce welcomes the Council's wetlands surveying and mapping and would seek further operationalisation of this data and knowledge to inform peatland restoration and rehabilitation projects, which will be an important feature of the National Restoration Plan under EU Nature Restoration Law. It is important that the Council prepares in advance for the implementation of this plan within the County.

It is submitted that cutover raised bog areas should be prioritised for restoration projects and that an objective referencing this be integrated into the CDP. With a deadline of 2026 for finalising a National Restoration Plan is 2026, the CDP requires much greater proactive consideration of the County's restoration needs and references for these throughout the plan.

An Taisce welcomes WLP 1 and 2, particularly the emphasis on resisting development on wetlands and requiring an Ecological Impact Assessment (EclA). However, An Taisce note a potential conflict between WLP 1 and WLP 2 where it is simultaneously stated that development which degrades wetlands will be resisted, yet development reclaiming wetland areas will require EclA, which implies are open for consideration. A robust EclA notwithstanding, which An Taisce believes needs to be a much more common exercise in development planning, the high carbon sequestration properties of wetlands and the need to urgently restore the vast degraded wetland areas means any potential development in or around wetland areas requires very careful consideration.

Green Infrastructure:

An Taisce welcomes objective GIO 4 in relation to the inclusion of ecological corridors and stepping stones under Article 10 of the Habitats Directive.

An Taisce raises concerns in relation to the lack of a network of native tree nurseries at scale, with the supply gap being filled by imported species which adversely impacts genetic resilience and diversity of native tree stock. Genetic diversity is one of the three levels of diversity safeguarded by the UN Convention on Biological Diversity. An Taisce submit that issues around genetic diversity requires acknowledgment and consideration within the CDP, with local targets for addressing the shortfall of indigenous supply of native plant stock.

An Taisce submits that all green infrastructure objectives should be underpinned by adherence to the All-Ireland Pollinator Plan to ensure that pollinator-friendly planting and management is widespread.

Invasive Species:

An Taisce welcomes the inclusion of objective ISO 1 to tackle invasive species introduction within development proposals. An Taisce would welcome an extension to objective ISO 1 to ensure proactive management of invasive species infestations on all Council lands. Rhododendrum, Japanese Knotweed and Cherry Laurel have a particularly notable impact throughout the country. Also, An Taisce recommends the Council engages with the National Deer Management Strategy.

Areas of Primary Amenity:

An Taisce welcomes continued protection of Lough Muckno & Environs and Sliabh Beagh and the inclusion of actions in the proposed Lough Muckno Masterplan, as is action SO 7 (section 16) stating that both heritage and ecology will be critical at the site alongside sustainable tourism development.

Transport and Infrastructure

Transport and Integration with Land Use Planning:

The submissions contends that the fact that compact growth and sustainable mobility policies are not translating to better planning applications and decisions highlights the serious implementation failures regarding those policies and this must be addressed in the CDP.

Crucially, An Taisce submits that robust targeted and time lined plans are needed to ensure the efficient implementation of these policies, including specific modal shift targets for 2031. The submission recommends inclusion of settlement-specific targets and overall county level targets. Without such targets the effectiveness of the new CDP in achieving its sustainable transport and settlement objectives will be compromised. Sustainable mobility plans prepared under objective ATP 10 for Ballybay, Castleblayney and Clones also need detailed targets and timelines.

An Taisce recommends the inclusion of an objective ensuring sufficient public transport capacity as well as safe cycling and pedestrian infrastructure be provided prior to or in tandem with any new residential development. Increased sustainable transport infrastructure and capacity provision needs to come before expanded residential development, particularly in larger towns and their catchment areas.

Significant amounts of existing road space also need to be reallocated for high quality segregated cycle lanes and footpaths. To facilitate intermodal journeys, An Taisce recommends additional text to PTO 11: *The improvement on public transport services needs to include high quality public transport interchanges including conveniently located, secure, bicycle parking facilities (and provided at a high capacity at busier hubs).*

Roads:

An Taisce submits that transport policy and investment in Monaghan should be reprioritised away from road infrastructure, with exception of necessary maintenance and small-town bypasses, and instead redirected to support public and active transport projects and cycling infrastructure (align with Government commitment to a 2:1 ratio between public transport infrastructure and roads).

Public Water and Wastewater:

An Taisce submits that lands should not be zoned if there is no plan in place to provide the necessary wastewater treatment capacity within the plan period. Therefore, objective WWP 1 is welcomed. Ongoing proliferation of private wastewater treatment systems will present significant challenges for the achievement of Ireland's legally binding water quality targets under the Water Framework Directive. An Taisce recommends an objective be included specifically requiring that planning applications including a private wastewater treatment system be assessed for cumulative impacts with other such systems in the area to guard against water quality deterioration

Environment, Energy and Climate Change

Water Resources and Quality:

The submission highlights the challenge in achieving 'good' status in all water bodies by 2027 as required by the Water Framework Directive and notes that agriculture remains the primary pressure, followed by hydromorphological damage, forestry and urban wastewater.

Development Management and Water Quality:

The submission contends that the CDP should include a requirement for all development proposals to demonstrate full compliance with the WFD and Groundwater Directive. Article 4 (WFD) assessments are still not widely done as part of the planning process, the CDP should include an objective to require such assessments in cases where planning proposals may impact water quality.

Intensive Agriculture and Land Spreading on Manures and Sludge:

An Taisce submits that existing measures to prevent water quality deterioration as a result of intensive agricultural activities are not currently effective enough, as evidenced by the EPA's water quality data. Any application for land spreading that includes the land spreading of manures should be accompanied by a nutrient management plan and be assessed against WFD objectives and targets.

An Taisce recommends the inclusion at section 8.1.6 of mapping in assessing the risks posed by a proposed development to water quality, noting EPA Pollution Impact Potential mapping which indicates pollution risk for nitrogen and phosphorous on an almost field-level scale.

Amenity Lakes and Rivers:

An Taisce recommends that section 8.1.7 include mention of the risk posed to amenity rivers and lakes by blue green algae, which is not tested for as standard for bathing waters. Noting blue green algae results from excessive nutrient levels in waterbodies, primarily from agricultural runoff and sewage. It is extremely toxic, can cause serious gastrointestinal problems in humans and can be fatal to dogs.

Energy

Renewable Energy:

An Taisce recommends the development of a county Renewable Energy Strategy, REO 2, be prioritised given the level of ambition needed to address climate change and meet emissions reduction legal obligations.

In the interest of ensuring protection of biodiversity, recommend additional text (in bold) to objective REO 3 *'To facilitate the sustainable development, renewal and maintenance of energy generation infrastructure in order to maintain a secure energy supply while protecting the landscape, archaeological and built heritage and having regard to the provisions of the Habitats Directive **and other environmental and ecological considerations.***' An Taisce recommends updating section 8.2.8 on solar energy to include consideration of solar farms and solar installations on industrial and farm buildings as well as the level of ambition needed in that area to support the achievement of climate legal obligations.

Bioenergy:

An Taisce is broadly supportive of bioenergy and its role in the energy transition, however, concerns that biomethane cannot be automatically labelled as carbon neutral, a renewable gas or be assumed to contribute to climate mitigation due to the environmental risks associated with fugitive methane losses, the use of chemical fertiliser to produce silage and the ammonia emissions which can result from applying the by-product of the anaerobic digestion process. The production of biogas from poultry litter in Co. Monaghan could prove to be a useful way of reducing pollution associated with the litter, but other risks of biogas production must also be addressed.

The emissions that contribute to the production of feedstocks must be considered, as they can significantly negatively impact biomethane's overall contribution to climate mitigation. AD predicated on increased grass or energy crop production has the potential for significant adverse impacts to climate and water quality as a result of the increased levels of fertiliser input needed to grow the energy crops. With regard to the use of slurry, intensive cattle farming is also a major emitter of greenhouse gases. Any use of slurry for bioenergy production should not be reliant upon or drive further bovine agriculture intensification.

An Taisce highlights numerous scientifically report field assessments show anaerobic digesters suffer significant fugitive emissions problems via methane leaks.

Regarding end uses, mixing biomethane with fossil gas for injection into the grid will exacerbate infrastructural lock-in to fossil fuel use in the medium to long term which is incompatible with emissions reduction legal obligations and supporting policies. Supplying biomethane to local off-grid industrial users would be a preferable option, provided it is used for electricity generation and is not mixed with fossil gas.

The issues above require much more critical consideration than they are currently given in Chapter 8. The above-mentioned issues should be accounted for in the environmental considerations under objective REO 4.

Flood Risk Management:

An Taisce recommends that both the policies and the zoning in the CDP should take account of up-to-date climate projections with regard to increased fluvial and pluvial flood risk. New development proposals should be explicitly required to demonstrate consideration of this where relevant. An Taisce recommends the addition of a flood risk objective to ensure flood risk assessments include consideration of potential impacts of flooding arising from climate change, particularly increased pluvial and fluvial flooding from rainfall events.

Surface Water Drainage:

An Taisce has concerns in relation to soil sealing, the covering of soil with hard impermeable material to facilitate infrastructural development, eliminating penetration of the soil by air and water and detrimental to soil health and irreversibility. European Environment Agency recognises that permeable pavements help to mitigate the impact of paving on water and carbon cycles. An Taisce submits that recognition of the soil sealing effect would be an important contribution to the CDP for providing further context as to the benefits of a permeable surfacing regime in infrastructure development. An Taisce notes the section refers to DHLGH guidance from 2022 on managing rainwater and surface water runoff in urban areas. However, this guidance was updated 16 May 2024, therefore requiring integration into the CDP.

Artificial lighting:

An Taisce recommends section 8.10 on lighting includes a specification of the maximum colour temperature permissible, in accordance with guidance provided by Dark Sky Ireland, which is 2,200 K (Kelvins), which is least harmful to wildlife and the night sky. Include objective: *'Blue light in LEDs should be limited to warmer-coloured lighting with a correlated colour temperature (CCT) at or below 2,200 K. This provides a balance of energy use, safety, and environmental and health impacts.'*

An Taisce recommends that the CDP considers a dimming regime for lighting in the late evening, which offers dual benefits of less energy while minimising disturbances to insect, animal and plant life. An

Taisce advises that Dary Sky Ireland's 'Environmentally Friendly Lighting Guide' is consulted to inform light pollution objectives in the CDP.

Air Quality:

An Taisce acknowledges that section 8.12 recognises transport patterns and a reliance on fossil fuels for heating and business are drivers of poor air quality, also recommend that the section recognise the impacts of poor air quality on human health.

The submission notes that ammonia, a major by-product of animal-based agriculture that combines with other pollutants to form PM2.5, one of the most dangerous and deadly types of air pollution particles, is recognised by section 8.12. Ammonia also poses serious threat to biodiversity, can cause soil acidification and runoff of polluting nitrates into nearby waterbodies. Ammonia also impacts bogs and heaths, killing sensitive species, such as lichens and mosses, and damaging whole ecosystems.

An Taisce notes Ireland has consistently breached EU national Emissions Ceiling Directive with regard to ammonia. An Taisce contends this is particularly problematic in border counties, in part due to the high concentration of intensive poultry operations. The CDP should consider ammonia in a cross-border context.

Strategic Environmental Assessment:

An Taisce notes the Council's obligation in relation to the SEA process is robust, effective and considers the Council should ensure that monitoring of significant environmental effects is carried out and that any unforeseen adverse impacts that arise are remediated.

Implementation and Monitoring:

An Taisce notes the importance of robust targets, actions and measures to achieve the tangible implementation of the Plan's objectives and policies. An Taisce further notes that apart from targets for population, housing, etc. the objectives contain no specific targets. The most serious omissions are in relation to a modal shift in transport and to climate mitigation, both of which are also quite relevant to compact growth. An Taisce considers the success or otherwise of the Plan can only be judged against quantifiable and implementable criteria which are subject to ongoing monitoring.

Chief Executive Response

Overarching comments: The overarching comments to establish a coherent framework for the coordinated sustainable economic, social, cultural and environmental development in line with UN SDGs is acknowledged. It is welcome that An Taisce observes that the Draft Plan already contains many of these goals. Other matters raised are outlined and are responded to below.

Addressing the Climate and Biodiversity Emergencies

Climate Breakdown: In response to the request for a standalone Strategic Objective for Climate, it is considered that Chapter 8 Environment, Energy and Climate Change is sufficient to support mitigating and adapting to climate change, including Strategic Objective EEC SO 1.

Legally binding climate obligations and level of ambition needed / Climate Act Obligations on Public Authorities /Climate in the Draft Plan:

Noting the points made in respect of climate obligations, the general objectives contained in the draft Plan are considered compatible with broader climate action objectives and that the principles of climate change have been incorporated into and are intrinsic within each chapter. The draft Plan is considered in accordance with relevant legislation. Section 8.4 of the draft CDP outlines the legislative and planning context which sets the climate action parameters and requirements that the local authority must adhere to and is committed to implementing these actions. Furthermore, Monaghan

County Council is a signatory to the Climate Action Charter for Local Authorities, which sets out a common understanding in relation to climate change, the acknowledgement of a joint up approach by the entire government to address climate change, and acknowledges specific local government supports of central government in relation to climate change.

Just Transition: In respect of the recommendation that Just Transition principles be much more explicit throughout the Plan, it should be noted that Chapter 1 of the draft Plan contains economic, environmental and social strategic objectives that are reflected throughout the entire plan.

Protecting Biodiversity and Restoring Nature: In response to the request for a Strategic Objective on biodiversity protection and nature restoration, the provisions at Chapter 6 Heritage, Conservation and Landscape are considered sufficient to support biodiversity protection and nature restoration, noting also the Council Biodiversity and Heritage Strategic Plan.

Sustainable Settlement: Acknowledging An Taisce's welcome to commitments to compact growth in the Plan, and in response to request for policies to direct further development to existing developments, and for an elaboration of a specific framework to determine threshold for buildings that can be accommodated, the policies and objectives at 2.11 of Chapter 2 – Core Strategy encourage brownfield development, sequential development from the centre outwards, and infill development to promote consolidation and rounding off of small villages. Furthermore, Rural Housing Objective RSO 2 encourages renovation of vacant or derelict buildings, replacement dwellings, redevelopment of previously developed residential sites and former homesteads, and the redevelopment of sites containing industrial or agricultural buildings.

Reconciling Construction with Climate Obligations: Noting the comments on prioritising retrofitting of social housing stock, the Housing Section of the Council are undertaking a programme of retrofitting of social housing in the County.

Economic Development

Agriculture: Noting the recommendation to enhance Agriculture Objective AGFO 1, the objective is considered adequate to allow for a wide range of agricultural activities. Noting the recommendation to include for compliance with the Water Framework Directive, Article 4, at Agriculture Objective AGFO 2, the wording of the objective is considered adequate, and provides the relevant environmental legislation.

Forestry: Noting the request in respect of Continuous Cover Forest, the draft CDP recognises the importance of forestry development, and its impacts on the landscape, wildlife and biodiversity. Monaghan County Council is a consultative body in relation to applications to the Forestry Service for initial afforestation and submits observations on such applications, as appropriate. Objectives contained in the Draft CDP, including AGFO 3 are considered sufficient to address the protection of sustainable forestry, which includes for the protection of natural waters, wildlife habitats, conservation areas, heritage areas, prominent landscape features, archaeological sites, nature designations and scenic routes.

Extractive Industry: Noting the comments regarding enforcement, there are a number of regulatory provisions set out within the Act.

Tourism: Noting the comments in relation to car-free tourism and slower, place-based tourism, Monaghan Tourism strategy and Active Travel plan seek to address longer stays and the promotion of sustainable travel, including greenways.

Noting the request for TMO 18 be amended to include for consideration of climate impacts and ensure compliance with the Habitats and Birds Directives, the wording of the objective, is considered sufficient and the provisions in respect of development complying with the Habitats and Birds Directives are included at Chapter 6 of the Draft Plan.

Community: Noting the recommendation to expand consideration of pedestrian and cycle access to community facilities beyond education, this objective is specifically in relation to the provision of safe routes to school. Chapter 7 contains policies which addresses Active Travel more broadly.

Heritage, Conservation and Landscape

Built Heritage: Noting the comments in relation to development and landscape considerations, and the potential impacts on existing built heritage, the landscape and protected structures policies and objectives contained in Chapter 6 are considered sufficient to address such sensitivities.

Protected Structures and Endangerment: The support for objective PMPO 4 to undertake vulnerability assessments is acknowledged.

Trees, Hedgerows and Woodlands: Noting the request for strengthening policy TWP 1, to ensure supplementary planting of native species is a requirement, it is proposed to amend TWP 1. As set out below in the recommendation.

Noting observations in respect of non-compliance in respect of unlawful removal of vegetation from March to end of August, it is considered that the detail provided at section 6.15 detailing that it is an offence under the Wildlife Act to destroy vegetation on uncultivated land between 01 March and 31 August each year is sufficient. Policing of this falls outside the remit of planning.

Wetlands: Noting the concerns raised in respect of conflicting policies, WLP 1 and WLP 2, WLP 1 recognises the Planning Authority's position on the importance of wetlands. However, in recognising that there may be exceptional circumstances for infilling or reclaiming wetlands, WLP 2 provides for such, which must be justified through an Ecological Impact Assessment.

Green Infrastructure: Noting concerns in relation to a lack of network of native tree nurseries and genetic diversity, along with adherence to the All-Ireland Pollinator Plan, the Green Infrastructure objectives and policies contained within the draft CDP are considered sufficient, and noting the objective to prepare a Green Infrastructure Strategy.

Invasive Species: Noting comments in relation to management of invasive species on Council lands, objective ISO 1 is considered sufficient to address this.

Areas of Primary Amenity: The welcoming of continued protection of Lough Muckno and Sliabh Beagh is acknowledged.

Transport and Infrastructure

Transport and Integration with Land Use Planning: Noting recommendations for robust and targeted time lined plans to ensure implementation. It is proposed to amend, add new policies on foot of the Office of the Planning Regulator (OPR) submission. See OPR recommendations in respect of amendments to TP 1, MTO 9, CMO 6, CBO 5, CLO 7, BBO 7, TP 2, TO 9, MT14, CMO11, CBO 6, CLO 8 and BBO 8.

The addition of secure, bicycle parking facilities at mobility hubs is a reasonable expectation. The proposed amending of policy PTO 11 to 'include for high quality public transport interchanges

including conveniently located, secure, bicycle parking facilities (and provided at a high capacity at busier hubs),’ is included for within the preceding text of 7.5 Public and Shared Transport Paragraph 9. This is considered sufficient and does not warrant inclusion within the policy.

Roads: The comments in respect of Government commitment to a 2:1 ratio between public transport infrastructure and roads is acknowledged.

Public Water and Wastewater: Noting concerns in respect of proliferation of private wastewater treatment systems the Development Management Standards 15.22.5 On-Site Wastewater Treatment Systems details the requirements for compliance with EPA Code of Practice – Wastewater Treatment and Disposal Systems Serving Single Houses 2021.

Environment, Energy and Climate Change

Water Resources and Quality: Comments in relation to primary pressures from agriculture, followed by hydromorphological damage, forestry and urban wastewater is acknowledged.

Development Management and Water Quality: In noting the request for a requirement for assessments where proposals may impact water quality, demonstrating full compliance with the WFD and Groundwater Directive, reference is made within the Draft Plan, 8.1.5 and 15.22.6 for developments to comply with Surface Waters Regulations, Groundwater Regulations, Wastewater Discharge Regulations, which are considered adequate to address water quality in development proposals.

Intensive Agriculture and Land Spreading on Manures and Sludge: Noting the comments in relation to existing measures to prevent water quality deterioration as a result of intensive agricultural activities not being effective enough, and the request for applications that include land spreading to be accompanied by a nutrient management plan, be assessed against WFD, and for mapping, Water Protection Policy WWP1 and detailed requirements at 15.22.6 provide for standards in relation to protection of water quality and assessment of development proposals. These measures are considered adequate.

Amenity Lakes and Rivers: Noting the request for reference to the risk posed by blue green algae, it is proposed to include reference in text of section 8.1.7 within paragraph 2. As set out in the recommendation below.

Energy

Renewable Energy: Noting recommendations to prioritise the development of a Renewable Energy Strategy, it is recommended to amend objective REO 2 (provide a specific timeframe) as recommended in the OPR submission consideration.

In addition, it is recommended that objective REO 3 is amended to include for having regard to environmental and ecological considerations. As set out in the recommendation below.

Bioenergy: Noting the comments in regard to anaerobic digestion, biogas, and biomethane, the detail provided at 8.2.7 Bio-Energy are considered sufficient in addressing the potential of bioenergy whilst having regard to environmental considerations.

Flood Risk Management: The concerns in relation to flooding and the need to take account of up-to-date climate projections with regards to fluvial and pluvial flood risk, to ensure flood risk assessments consider potential impacts from climate change are noted. It is proposed to add a new strategic objective (SSO 22) and a further policy (FRP 1) on foot of the Office of the Planning Regulator (OPR)

submission. See OPR recommendations in respect of these amendments which addresses the points raised.

Surface Water Drainage: Noting the comments in relation to soil sealing with impermeable material, Surface Water Drainage policy objective SWDO 1 provides for the promotion and encouragement of Sustainable Drainage Systems and Green-Blue Infrastructure, and 15.22.7 provides for the requirement of SuDS which is considered adequate. In noting the updated guidance on managing rainwater and surface water, it is proposed to amend paragraph 15.22.7 Paragraph 5, as set out below in the recommendation.

Artificial lighting: Noting the request for specifications in respect of lighting in the interests of protection of wildlife and birdlife, the lighting policies LP1 to LP3 are considered sufficient.

Air Quality: Noting the concerns raised in relation to ammonia associated with intensive poultry production and impacts on biodiversity, the impacts of such are addressed at 15.13.2 of the Draft Plan, including intensive agricultural installations which will result in an increase in ammonia and/or nitrogen emissions within 10 km off a European Site not being permitted, and with permitted developments required to provide satisfactory details of measures to address waste and emissions such as litter, slurry, etc.

Strategic Environmental Assessment: Noting the comments in relation to the Council's obligations in relation to SEA, as Section 10 of the Draft SEA Environmental Report notes, the set of SEOs established for enabling monitoring and measurement of the Plan's performance will serve as quantifiable indicators for measuring the environmental effects of the Plan. These environmental effects will be monitored once every year over the course of the Plan's six-year lifetime and a monitoring report will be published to document monitoring outcomes.

Where the monitoring identifies that the implementation of the Plan may or has resulted in a significant negative environment effect, an in-depth review of the Plan will take place, and the Plan will be updated in a manner that satisfactorily mitigates these environmental effects.

Similarly, where monitoring indicates that potential positive environmental effects associated with Plan implementation are not being adequately realised, the Plan will be reviewed and updated in a manner that supports the realisation of all potential positive environmental effects, having regard to the overall vision and high-level objectives of the Plan.

Implementation and Monitoring: Noting the comments in relation to the lack of objectives on specific targets, in particular omissions in relation to modal shift in transport and climate mitigation, the response to the OPR submission has proposed amendments to objectives in respect of transport plans, detailed above at Transport section. The Draft Plan contains a number of other objectives, for example, preparing a Green Infrastructure Strategy (GIO 1), Green Infrastructure Network (GIO 2), Renewable Energy Strategy (REO 2), Village Plans (SHO 5 and VIO 4) and new objective to update the Landscape Character Assessment, LCO 5 – where timescales have now been proposed on foot of the OPR submission.

Chief Executive Recommendations

The following amendments are recommended:

At Chapter 6 Environment Energy and Climate Change, Section 6.15 Trees, Hedgerows and Woodlands, within this section at objective TWP 1 add the red text as follows and remove strikethrough:

Trees and Woodlands Policies	
TWP 1	To minimise loss of tree(s) and hedgerow associated with any development

	proposal and encourage the retention of existing mature trees, hedgerows and woodlands in new developments. Where removal is unavoidable consideration should be given to transplanting trees and/or providing compensatory planting of native tree species on the site shall be provided, as appropriate.
--	--

To include reference in text of **section 8.1.7 within paragraph 2** (new text in red):

‘Development management measures will take account of the protection and improvement of amenity lakes and bathing waters. Such waters are sensitive to pollution in general and particularly to microbial pollution. **Blue green algae have become an increasing risk to the quality of rivers and lakes, which results from excessive nutrient levels in waterbodies, primarily from agricultural runoff and sewage.** Many wastewater treatment technologies do not currently remove microbial contaminants and the impact of new or expanding developments need to take account of public health issues relating to bathing areas and drinking water sources. Land spreading of manures is another source of additional measures to protect known amenity areas.’

At Chapter 8 Environment Energy and Climate Change, Section 8.2.11 titled Passive Housing, within this section at objective REO 3 add the red text as follows:

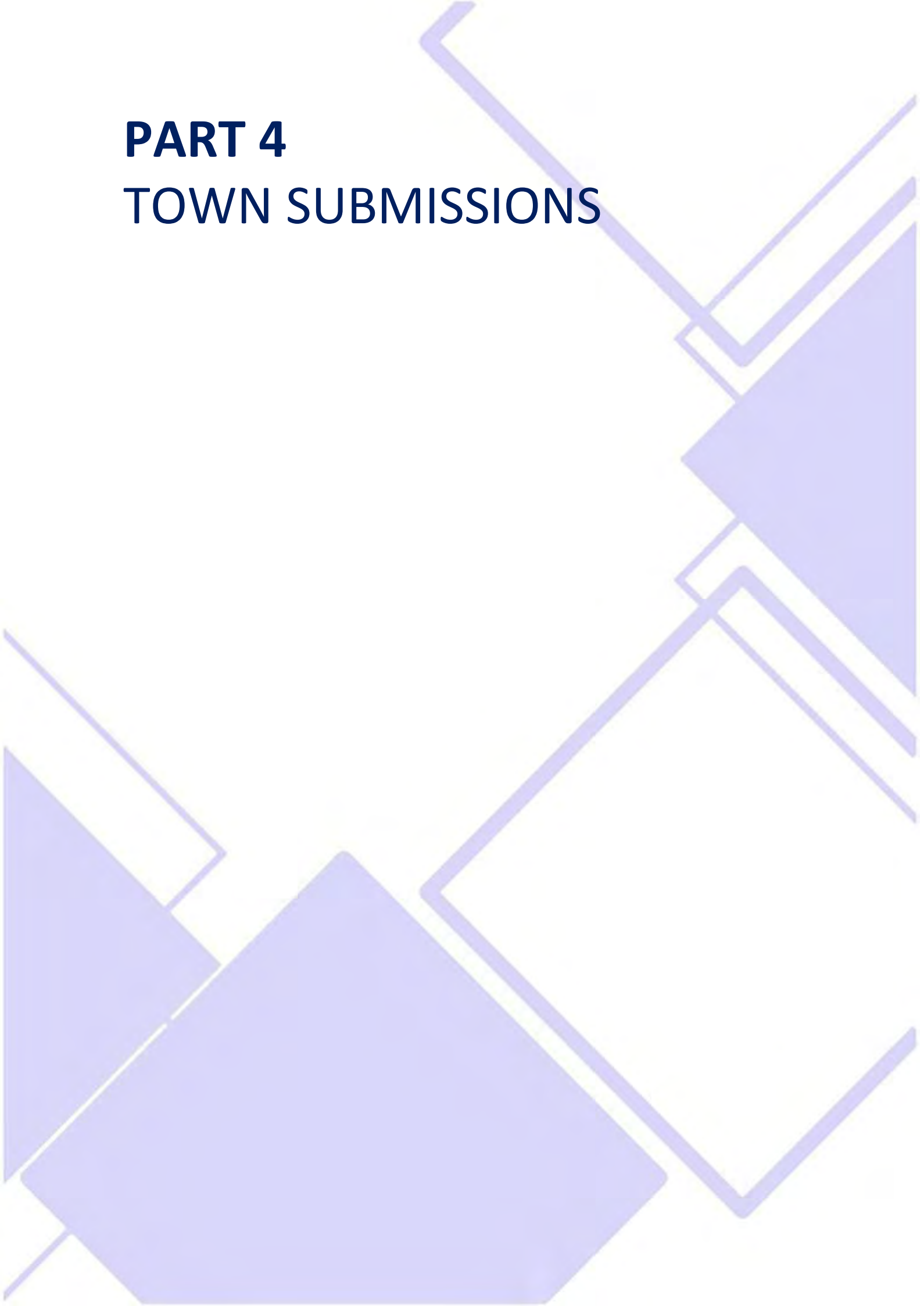
Renewable Energy Objective	
REO 3	‘To facilitate the sustainable development, renewal and maintenance of energy generation infrastructure in order to maintain a secure energy supply while protecting the landscape, archaeological and built heritage and having regard to the provisions of the Habitats Directive and other environmental and ecological considerations. ’

To amend 15.22.7 Paragraph 5 (delete text strikethrough and new text in red): ‘All new developments in urban areas will be required to implement nature-based solutions in accordance with Nature Based ~~Solutions to the Management of Urban Rainwater and Urban Surface Water Runoff in Urban Areas (DHLGH, 2022)~~ **Discharges - A National Strategy 2024.**’

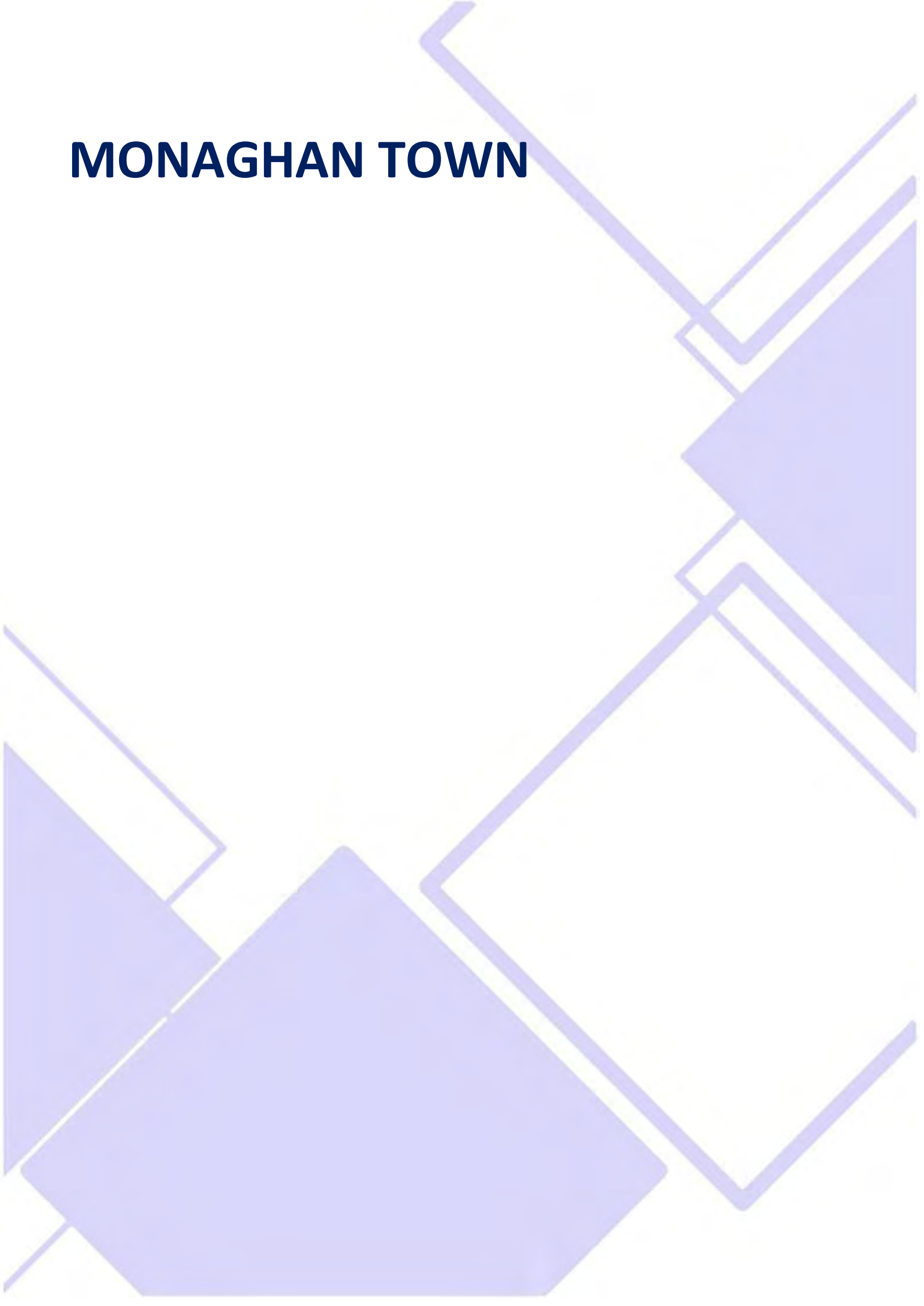
This submission has resulted in a review of a number of policies and objectives as discussed above. However, a number of these have been addressed sufficiently within the relative proposed policies and objectives amendments contained within the response to the OPR submission, namely REO 2, FRP 1, SSO 22, TP 1, MTO 9, CMO 6, CBO 5, CLO 7, BBO 8, TP 2, TO 9, MTO 14, CMO 11, CBO 6, CLO 8, BBO 8. Therefore, no amendments are recommended in respect of these policies / objectives.

PART 4

TOWN SUBMISSIONS



MONAGHAN TOWN



Submissions relating to Monaghan Town			
Submission Reference	Name/Organisation	Location of Subject Lands	Page No.
<u>MN-C22-MCDP-2</u>	Sean Mullen c/o Craft Studio	Monaghan Town	203
<u>MN-C22-MCDP-3</u>	Tommy Flack c/o CS Pringle	Killygowan, Ballybay Road, Monaghan	204
<u>MN-C22-MCDP-8</u>	M and S Property Enterprises Ltd c/o Genesis Planning Consultants	Lands at Dr McKenna Terrace	205
<u>MN-C22-MCDP-10</u>	McCartan View Ltd c/o Genesis Planning Consultants	Dublin Road, Monaghan Town	208
<u>MN-C22-MCDP-23</u>	Dermot and Lynn McNally	Lands at Coolshannagh, Monaghan Town, H18D820	212
<u>MN-C22-MCDP-26</u>	Marc McArdle	Rossmore Factory, Dublin Road, Monaghan	213
<u>MN-C22-MCDP-27</u>	Bernard Reilly	Rossmore Factory, Dublin Road, Monaghan	215
<u>MN-C22-MCDP-28</u>	Lynn Holland	Rossmore Factory, Dublin Road, Monaghan	217
<u>MN-C22-MCDP-29</u>	Lynn Holland on behalf of Bernard Reilly	Rossmore Factory, Dublin Road, Monaghan	219
<u>MN-C22-MCDP-30</u>	Peadar McCaffrey c/o Genesis Planning Consultants	Lands at Gallanagh, Monaghan Town	221
<u>MN-C22-MCDP-33</u>	Mon Commercial Holdings c/o Genesis Planning Consultants	Coolshannagh, Monaghan	224
<u>MN-C22-MCDP-37</u>	George McKenna	Road Proposal	228
<u>MN-C22-MCDP-45</u>	Brendan Sherlock	Dunsinaire Monaghan	230
<u>MN-C22-MCDP-53</u>	McGuigan Builders c/o Hughes Planning and Development Consultants	Lands at Drumbear, Monaghan Town	231
<u>MN-C22-MCDP-55</u>	Dermot McNally	Rossmore Factory, Dublin Road, Monaghan	239
<u>MN-C22-MCDP-56</u>	McGuigan Builders c/o Hughes Planning and Development Consultants	Newgrove	241

<u>MN-C22-MCDP-57</u>	Paul Gilsean	Lands at Coolshannagh, Monaghan Town	242
<u>MN-C22-MCDP-58</u>	Moffett Investment Holdings c/o McGuigan Architects	Kilnacloy, Monaghan	244
<u>MN-C22-MCDP-61</u>	Jane Keenan c/o Craft Studio	Latlorcan, Monaghan Town.	247
<u>MN-C22-MCDP-63</u>	Pat Mohan	Mullaghduin, Clones Road, Monaghan Town.	250
<u>MN-C22-MCDP-65</u>	Peter Coyle, Des McKenna, Dick Clerkin	Mullaghduin, Monaghan	251
<u>MN-C22-MCDP-67</u>	Richard Shirley	Rooskey, Monaghan	255
<u>MN-C22-MCDP-70</u>	Eamonn Hackett	Rossmore Factory, Dublin Road, Monaghan	257
<u>MN-C22-MCDP-73</u>	Cannon Kirk Ltd c/o MJC Planning	Gortakeegan, Newbliss Road, Monaghan Town	259
<u>MN-C22-MCDP-74</u>	Margo Smyth c/o Aidan Sherlock	Latlorcan	269
<u>MN-C22-MCDP-77</u>	TF Partnership c/o The Planning Partnership	Tullygrimes	271
<u>MN-C22-MCDP-82</u>	Clarlan Limited c/o Hughes Planning and Development Consultants	Lands at Killygowan, Monaghan Town	274
<u>MN-C22-MCDP-85</u>	Joe Mallon	Tirkeenan, Monaghan Town	284
<u>MN-C22-MCDP-86</u>	Joe Mallon	Dummy Lane, Anahagh, Monaghan Town	285
<u>MN-C22-MCDP-87</u>	Phyllis Moffett c/o Hughes Planning and Development Consultants	Lands at Cootehill/Ballybay Road, Monaghan Town	286
<u>MN-C22-MCDP-95</u>	Colm Herron c/o Hughes Planning and Development Consultants	Lands at Drumbear, Monaghan Town	294
<u>MN-C22-MCDP-97</u>	Colm Herron c/o Hughes Planning and Development Consultants	Lands at Annahagh Lane, Monaghan Town	304
<u>MN-C22-MCDP-104</u>	Monaghan County Board of the Gaelic Athletic Association (GAA) c/o Armstrong Fenton Associates	Cornacassa Demense, Monaghan Town.	314

<u>MN-C22-MCDP-106</u>	Rossmore Assets Limited	North Road, Monaghan	319
<u>MN-C22-MCDP-108</u>	Monaghan Retail Park Co-Ownership c/o Tony Bamford Planning	Monaghan Retail Park, Cornacassa	321
<u>MN-C22-MCDP-109</u>	Francis McKenna Buildtec Accoustics	Rossmore Factory, Dublin Road, Monaghan	325
<u>MN-C22-MCDP-115</u>	Joe Connolly	Cornacassa, Monaghan	327
<u>MN-C22-MCDP-120</u>	Gary McPhilips c/o Hughes Planning and Development Consultants	Lands at 18 Old Cross Square, Monaghan	328
<u>MN-C22-MCDP-136</u>	Eddie O Gara	Monaghan	333
<u>MN-C22-MCDP-137</u>	Monaghan Harps GAA c/o Coyle Structural Civil	Lands at Cornecassa Demense, Monaghan Town	334
<u>MN-C22-MCDP-144</u>	Marie Curley and Marian Egan	Lands at Aghananiny, Monaghan Town	336
<u>MN-C22-MCDP-149</u>	Cavan and Monaghan Education and Training Board		338

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-2</u>	Sean Mullen c/o Craft Studio	Monaghan Town	3

Summary of Submission & Issues Raised

- The subject site is zoned as ‘Strategic Residential Reserve’, within the Draft Monaghan County Development Plan 2025-2031.
- The subject site is a brownfield site, which previously had planning permission granted for two houses under Planning Reference 06/30031. The site has been excavated in preparation of development however works stopped in the recession.
- The owner has appointed agent to develop designs for residential development on the site.
- Submission seeks a revision to the draft development plan map so that the site is rezoned as Residential A.

Chief Executive Response

This submission requests a rezoning request from ‘Strategic Residential Reserve’ to ‘Proposed Residential A’. The draft Monaghan County Development Plan 2025-2031 designated a small portion of the subject lands, where they adjoin the public road, as ‘Existing Residential’ whilst the majority of the subject lands were zoned ‘Strategic Residential Reserve’.

It is important to note that the subject lands form a part of a much wider ‘Strategic Residential Reserve’ land parcel. There is a submission on adjacent lands (MN-C22-MCDP-8) which also seeks a rezoning from ‘Strategic Residential Reserve’ to ‘Proposed Residential A’. Having further considered the most appropriate zoning of the subject lands, and the wider ‘Strategic Residential Reserve’ zoning of which it forms a part, and taking into account the significant topographical challenges which the lands present, it is considered appropriate to rezone the ‘Strategic Residential Reserve’ lands to ‘Community Services/Facilities’ to facilitate the expansion and development of the allotments to the southwest of the subject lands.

Chief Executive Recommendation

- Rezone the ‘Strategic Residential Reserve’ portion of the subject lands to ‘Community Services/Facilities’.
- Retain ‘Existing Residential’ zoning on subject lands.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-3</u>	Tommy Flack c/o CS Pringle	Killygowan, Ballybay Road, Monaghan Town	4

Summary of Submission & Issues Raised

The submission requests the rezoning of land from Industry, Employment and Enterprise to Residential as follows:

1. Rezone garden to front of three terraced dwelling houses (built 1830s/40s) from Industry, Employment and Enterprise to residential
2. Rezone part of lands (Folio MN19511 and MN19497) from Industry, Employment and Enterprise to Residential
 - Said lands were zoned 'High Density Residential' in MCDP 2007-2013
 - Said lands were incorrectly rezoned to 'Industry/Employment/Enterprise' in MCDP 2019-2025
 - Access via the existing entrance and driveway, sight lines are achievable in accordance with DMURS requirements

Chief Executive Response

The subject land is adjoining terraced houses at Killygowan, Ballybay Road, Monaghan Town. The subject lands are within the southern edge of the Settlement Envelope, are Tier 2 'Serviceable Zoned Land' and are zoned 'Industry, Employment and Enterprise' in the Draft Plan.

The submission is twofold; it requests a rezone of land from 'Industry, Employment and Enterprise' to Residential as follows:

Rezone garden to front of three terraced dwelling houses from 'Industry, Employment and Enterprise' to 'Existing Residential':

Post an additional site inspection, these lands clearly comprise private residential amenity space and parking area, therefore it is recommended that the subject front garden area is rezoned from 'Industry, Employment and Enterprise' to 'Existing Residential'.

Rezone part of lands (Folio MN19511 and MN19497) from 'Industry, Employment and Enterprise' to 'Residential':

The lands to the east of the terraced houses are gardens associated with the residential use. Therefore, it is appropriate to rezone part of the submission lands (Folio MN19511 and MN19497) to 'Existing Residential'.

Chief Executive Recommendations

It is recommended that the subject lands are rezoned from 'Industry, Enterprise, Employment' to 'Existing Residential'.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-8</u>	M&S property Enterprises Ltd. c/o Genesis Planning Consultants	Lands at Dr McKenna Terrace Monaghan Town	5

Summary of Submission & Issues Raised

The submission requests the rezoning of lands from ‘Strategic Residential Reserve’ to ‘Residential A’ (Folio MN19275F). It also states that the road verge abutting the site should not be zoned as ‘Strategic Residential Reserve’ but rather white lands.

Site Location

- The lands are located in a residential area known as Dr McKenna Terrace in Monaghan Town

Current Zoning in MCDP 2019-2025

- Zoned ‘Strategic Residential Reserve’ with zoning objective ‘To protect lands that are considered strategic in location for future residential development’
- Reference to Section 2.4.1 and target of 20% population growth provided for on development of infill/brownfield/regeneration lands within the built envelope of existing settlements
- Reference to Section 2.4.2 seeking the development of infill and/or brownfield/regeneration lands

Site & Context

- Site is currently vacant and is sequentially appropriate as an infill development
- Within walking distance of Monaghan Town
- Services are in-situ along the site frontage
- Readily accessible by existing roads and footpaths
- Adequately separated from neighbouring properties so no impacts in terms of overlooking or overshadowing

National Policy Context

- Extracts demonstrate how the proposal is consistent with National Policy Context, regarding making better use of under-utilised lands including infill and brownfield:
 - National Planning Framework 2040 (Objectives 3a, 3c, 11 and 35)
 - Urban Development and Building Height Guidelines (2018) (Paragraphs 1.17, 1.20, 2.7 and 3.1)
 - Draft NPF Review, July 2024 and increase to the National Population Growth Target

Local Policy Context

- MCDP 2019-2025: Monaghan Town has delivered 181 housing units, averaging 33 units per year- well below the Core Strategy annual target of 89 units per year
- Constraints in delivering housing include Covid, cost inflation and housing schemes not being viable
- Draft MCDP allocates housing for 380 units, representing a reduction of 155 units compared to MCDP 2019-2025
- Core Strategy is based on CSO Statistics 2022 which is at odds with the ERSI and NPF Review of population growth across the State
- Outdated CSO data undermines Monaghan Town Housing Allocation
- Geodirectory Database show low rates of new addresses and low commencement rates are noted and need to be reversed
- Correct approach would be to (a) carry forward units that have not been delivered from MCDP 2019-2025 and (b) provide headroom in the Core Strategy for residential development

Sequential development and Infill

- Subject site is located immediately beside the town centre
- Subject site is highly suitable for residential development
- Sites further removed from the town centre are 'Proposed Residential A' which does not align with the sequential planning principles
- Subject site comply with Objectives HSO2, CSO6 and URO1 of Draft MCDP 2025-2031 to achieve sequential development

The Proposal

- A Scheme has been designed to deliver an apartment development of 22 units on the lands
- Site-specific design, daylight and shadow analysis, residential amenity, access and services, bicycle and car parking, active frontages, private and public open spaces etc have been considered in the design

Requested Zonings

- Rezone land from 'Strategic Residential Reserve' to 'Residential A'
- The road verge abutting the site should not be zoned as 'Strategic Residential Reserve' but rather white lands

Summary

- Lands are sequentially appropriate and suitable for residential development given the proximity to Monaghan Town Centre
- Under the tiered approach set out in the NPF, these lands are Tier 1 (serviced) and should therefore be prioritised under the development plan process
- Proposal seeks to address the housing shortage in Monaghan Town
- Request to rezone land from 'Strategic Residential Reserve' to 'Residential A'

Chief Executive Response

The submission requests the rezoning of lands from 'Strategic Residential Reserve' to 'Residential A' (Folio MN19275F).

The subject lands are topographically challenging comprising a steep slope and are located in a residential area known as Dr McKenna Terrace in Monaghan Town. The lands are located within the settlement envelope, are Tier 1 'Serviced Zoned Land', sequentially close to the town centre and are zoned 'Strategic Residential Reserve' in the Draft Plan. The lands are also in close proximity to lands zoned 'Community Services/Facilities' which are in use for community allotments.

The Core Strategy of the Development Plan recognises the role of settlements in driving the development of the County and identifies the scope of development possible for the County, while remaining consistent with National and Regional policy. It also identifies the quantum and location of development for the plan period, consistent with the population targets and settlement hierarchy that reflects the availability of existing services, planned investment, sequential development and environmental requirements.

The OPR submission recommended that this site be reviewed and to rezone the lands from Strategic Residential Reserve for an appropriate land use where they do not support long term compact growth and / or do not follow a sequential approach to the zoning of lands and / or are in an area subject to flooding.

Given the location and the topographically challenging lands, it is considered that the most appropriate land use zoning for these lands is 'Community Services/Facilities' to encourage the development and expansion of the nearby allotment.

Chief Executive Recommendation

It is recommended that the subject lands and the wider portion of 'Strategic Residential Reserve' lands be zoned for 'Community Services/Facilities'.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-10</u>	Genisis Planning on behalf of McCartan View Ltd	Dublin Road, Monaghan Town	6

Summary of Submission & Issues Raised

History

- Land occupies approx. 1.42ha.
- Extant Planning permission (19/441) on site, was granted on the 19/06/2020, commencement of construction being in October 2024, for 42 residential units and all ancillary works – delivery of such will be towards the end of 2025 and into 2026.
- Approved net density on site is 34 units per hectare – therefore to change to low density in the Draft Plan is contrary to the extant permission and the policy objectives of Section 28 Guidelines ‘Sustainable and Compact Settlement-Guidelines for Planning Authorities’.

Project design & delivery

As per the extant permission 19/441 the ongoing works will deliver units 34dph as granted and a variety of house types. The density and approved will achieve:

- A high-quality public realm, one which is enclosed by attractive buildings which actively front onto the road and internal aspects of the site providing pedestrian comfort and security.
- A scheme which responds to its locational context in terms of appropriate density and building scale, making the best and most efficient use of the land.
- The provision of Social and Affordable Housing.
- The delivery of the scheme is in conjunction with Tuath; an approved Housing Body (as agreed with Housing Section in Monaghan Co Council).

Sequential development

Reference is made to similar sites on a submitted map referred to as 1, 2 and 3 which appear sequentially at the same distance as those of this subject site and do not benefit from extant permission. The site is appropriate in terms of sequential development given:

- The site has an extant permission 19/ 441, is currently being developed, is serviced, currently zoned Residential A, the site is sequentially the next parcel of land available.
- The provisions of the Development Plan Guidelines explicitly state that lands which are currently zoned should not be de-zoned.

Policy (NPF, Draft NPF and regional policy)

The subject lands are appropriate for both residential zoning as envisaged by the NPF given:

- Objectives 3a, 3c, 4, 5, 6, 7, 11, 13, 18a, 18b, 35 and NSO 10 of the NPF are complied with.
- The development would see significant delivery of a Tier 1 serviced site which is sequentially appropriate.
- The subject lands are appropriate for residential zoning and as a residential development as envisaged by the RSES given it is consistent with objective RPO 177 and 178.
- The zoning of the subject lands will improve the supply of residential units for Monaghan Town in a sustainable manner.
- Draft review of the NPF national population growth target increased from 5.8 million to 6.1 million by 2040 (an additional 300,000 people compared to the original NPF).
- If the 2016-2022 growth rates were continued, the population in 2040 would be c. 411,000 people higher than provided for in the draft NPF baseline projection.
- Therefore, an uplift in population growth should be factored into the Draft CPD and the Core strategy housing provisions for Monaghan Town.

- The proposal is consistent with the RSES and its policy objectives, particularly in its emphasis on the promotion of Monaghan Town.

Local Policy Context

- The land has already been deemed acceptable under the current Plan 2019-2025 as Res. A.
- Section 28 Development Plan Guidelines sets out that currently zoned land should not be de-zoned.
- Section 28 Compact Settlement Guidelines set out specific objective for residential density on such lands to be >30 units per hectare.

Monaghan 2019-2025 CPD & Core Strategy

- CDP outlines 535 units allocated for Monaghan Town in the Core Strategy, 181 has been delivered up until 2024. This equates to an average of 33 units per year. The annual requirement is 89 units per year.
- Around 38% of housing need under the 2019 CDP has been delivered resulting in a shortfall.
- Constraints in delivery housing over the last 4 years include, covid, cost price inflation 2021-2024, and scheme housing not being available.
- Believe the land required in the 2029 CDP was 44.1 ha and this should be retained.
- The previous allocation and targets for housing delivery should not be reduced further.

Draft Monaghan CDP and Core Strategy

- Housing land requirement has been reduced from 44.1 ha to 32.04ha which should not have occurred due to the housing crisis, the undelivered housing due to factors such as covid 19 and failure to meet the housing target in the 2019-2025 CDP.
- Only 33.8% of the housing required under the previous CDP has been delivered.
- This under-provision of housing needs from the 2019 CDP should be included into the Core Strategy for the 2025 CDP going forward.
- The Core Strategy 'Target' should not be viewed as a maximum but rather a minimum; therefore, requiring headroom in zoned lands for Residential lands.

Outdated Data

- A reduction in housing in Monaghan Town is not justified given; CSO figures inform CDP are outdated based on the period 2016-2022, CSO figures are now presented in the 2024 NPF Revision and also ESRI publication which shows a significant increase in population across the state.
- The CSO (Population and Migration Estimates – August 2023 and 2024) estimates that the population of the State increased by c. 196,300 people (or 3.7%) between April 2022 and April 2024 which suggests that c. 78% of the draft revision NPF 250,000 population uplift for 2022-2040 has already been reached in the past 2 years.
- Ireland's population increased by 387,274, or 1.312% year-on-year, between Census 2016 and Census 2022 – if this growth rate were to continue, it would result in a total national population of c. 6.51 million people by 2040, equating to an increase of 1.36 million people on the 2022 census. This compares to an annual rate of 0.95% for the draft NPF revision.
- These population growth figures need factored into the Core Strategy and also the Draft CDP going forward, with an associated increase and headroom in the provision of zoned residential lands to meet market demand for scheme housing.
- The uplift in population as per the Draft CDP is restrictive and conservative, given the emerging census and demographic trends captured in both the NPF Review (2024) and ESRI publications.

ESRI Projections

- Furthermore, we refer the Planning Authority to the ESRI publication ‘Population Projections, The Flow of New Households and Structural Housing Demand’ (July 2024). Key extracts are identified in the Executive summary of the document and are relevant to the CDP and Housing Provision in particular.
- In this context given Monaghan County is located proximate to the Eastern and Midlands Region we submit Monaghan Town should not be constrained in accommodating the growing population and flexibility needs incorporated into both zonings and policy objectives that will facilitate housing delivery in a manner that correlates with population growth and actual housing demand in the market.

Infrastructure assessment

- The lands subject to this submission are not identified or scored.
- The parcel of land at MT 7 includes land that does not have an extant permission, but is zoning as residential A.
- The infrastructure assessment needs to be revised to inform land zonings, the subject lands should be residential A in advance of parcel MT7 which is further removed in terms of travel distance from the town centre and are not sequential development from the Dublin Road.
- The subject lands should not be classified in the same parcel as MT8.

Development Plan Guidelines for Planning Authorities 2022

- Highlight Section 28 which require sequential approach especially for lands that have capacity to deliver residential units. To rezone to residential B is contrary to Section 28.
- Section 4.4.1 which states housing land that is serviced and zoned should not be subject to de-zoning. The guidelines state on page 47: Extant Planning permissions.
- In summary the proposed de zoning of the subject lands to low density @residential B’ is inconsistent with the policy objectives outlined in Section 4.4.1 of these Guidelines.
- The Guidelines require maintaining zoned land that can contribute to meeting housing demand, especially during times of urgent housing need and on lands that are currently being developed for housing delivery.
- Highlight section 2.1 of the guidelines, ‘the policy and guidance contained within these guidelines are to be implemented through stator development plans and in the consideration of individual planning application.
- Section 3 classes Monaghan Town as a Key Town and sets out a policy and objective for the subject lands to achieve 30dhp to 50dhp. The subject lands and extant permission is delivering 34dph. No site constraints necessitate a lower density.
- The proposed zoning is contrary to Compact Settlement Guidelines and should be rezoned to residential A.

Concluding

This submission requests that the Planning Authority designate the subject lands as outlined in the submission as suitable for ‘Proposed Residential A.’ Returning it to its previous zoning under the 2019-2025 plan. To note this is only 1 of 2 sites currently being developed in Monaghan Town.

No site objectives should be proposed for low density, given the extant permission 19/411 which is currently under construction. The proposed de zoning is inconsistent with policy objectives outlined in Section 4.4.1 of the Development Plan Guidelines and National Policy.

Chief Executive Response

In response to this submission, the comments will broadly be addressed in the order in which they are raised:

- It is agreed that these lands subject of this submission, are Tier 1 serviced and suitable for residential development.
- The Draft NPF is in 'Draft' format and as it has not been adopted limited weight can be attached to it.
- The Core Strategy of the County Development Plan recognises the role of settlements in driving the development of the County and identifies the scope of development possible for the County, while remaining consistent with National and Regional policy. It also identifies the quantum and location of development for the plan period, consistent with the population targets and settlement hierarchy that reflects the availability of existing services, planned investment, sequential development and environmental requirements. As per the Guidelines, the core strategy is in accordance with the existing NPF.
- In respect of the Development Plan Guidelines at Section 28 it is noted the reference to 'Extant Planning permissions' however at the point highlighted in orange within this section it does not specifically refer to 'extant permissions'. It should be noted that the land in question was not de-zoned in so far as it remains as a residential zoning.
- The CSO data referred to is not outdated, the Development Plan Guidelines 2022 refer Planning Authorities to consider data from the 'most recent census' (section 4.3.1) this was detailed in the Core Strategy. The projections made are in accordance with ESRI information. Census 2016 figures had been included to identify changes and potential trends to population figures, they did not form part of the calculations of the core strategy. The population projections/housing target figures in the Draft Plan are based on the 2022 census CSO data, along with the NFP and ESRI information.
*Amendments to the Core Strategy form part of this document in response to the points raised by the Office of the Planning Regulator (OPR).
- For clarity the lands subject of this submission has been identified in the Infrastructure Assessment and are scored, they are included within the land parcel identified as MT8. MT8 includes the subject lands as outlined in this submission, they have not been overlooked and nor does a planning permission distinguish them from the other land within MT8 all of which have been indicated as Tier 1.
- In reference to MT7 these lands are also designated as Tier 1. It is noted that 'sequential' is not a criterion within the Infrastructure Assessment nor is it referenced within the extract used to identified Tier 1 in the submission. The criterion applied is whether the lands are serviced.

It is acknowledged that the existing approved scheme subject of conditional grant of planning permission 19/441 has commenced and can be built out. The draft zoning is not currently applicable to the current permission.

It is recommended that the subject lands be zoned 'Proposed Residential B' to provide for the development of lower density houses within the urban settlement of Monaghan Town which may provide suitable housing to meet the needs of people who might otherwise seek to build a one-off dwelling in the rural area.

On this basis, and to ensure compact growth of Monaghan Town, the subject lands are most appropriately zoned 'Proposed Residential B'.

Chief Executive Recommendation

No amendment recommended.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-23</u>	Dermot & Lynn McNally	Coolshannagh, Monaghan Town.	7

Summary of Submission & Issues Raised

- Submission requests the rezoning of lands from Industry/Enterprise/Employment to Existing Residential. A map of the subject lands accompanies the submission.
- Subject lands contain a dwelling house and associated gardens/sheds.
- Part of the lands containing a large area of the gardens, polytunnel and sheds have been incorrectly zoned Industry/Enterprise/Employment and does not reflect the current or long-term usage of the site.
- Lands zoned Industry/Enterprise/Employment bound by the Shambles River to the eastern boundary, two residential cottages to the western boundary (with a third cottage recently demolished) and on the northern boundary a field zoned as both Landscape and Industry/Enterprise/Employment. The submission states that there would be a difficulty with developing the lands for Industry/Enterprise/Employment purposes with the only access to the area in question is through the front gate of the dwelling house.
- Photographs of the site and areas concerned have been included with the submission.

Chief Executive Response

The subject lands are located at Coolshannagh in Monaghan Town and comprise of a two-storey dwelling house and associated gardens and outbuildings. The lands are bound by the Shambles River to the eastern boundary, two residential cottages to the western boundary (with a third cottage recently demolished) and on the northern boundary a field zoned as both Landscape and Industry/Enterprise/Employment. The site is zoned part Existing Residential and part Industry/Enterprise/Employment. It is acknowledged that part of the lands zoned Industry/Enterprise/Employment are ancillary to the main dwelling house on the site and have been mapped incorrectly. It is therefore recommended that this part of the lands be zoned as Existing Residential to reflect the current use of the site.

Chief Executive Recommendation

It is recommended that part of the submission lands be rezoned from 'Industry/Enterprise/Employment' to 'Existing Residential'.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-26</u>	Marc McArdle	Dublin Road, Monaghan Town	N/A

Summary of Submission & Issues Raised

- Submission requests the removal of a Flood Risk Area from the Rossmore Factory site, Dublin Rd, Monaghan Town and retain the zoning as it currently exists in the Monaghan County Development Plan 2019 – 2025.
- Author of this submission is a business owner and local rate payer operating from the Rossmore Factory, Dublin Rd, Monaghan Town.
- Submission states that he has been operating at these premises for many years and that there has never been a single incident of flooding on the site.
- The submission raises concerns at the effect the Flood Risk Area has on his business, his ability to get insurance and his ability to make changes to how we operate in the future.
- The submission also raises concerns about the lack of direct communication in advance about such a severe proposal and also about the lack of information openly available on the County Council website about the scientific rationale behind the proposal and the limited time available to make a comprehensive submission.
- The submission refers to the SFRA Appendix in the Draft Monaghan County Development Plan 2019 – 2031, specifically to MTFRA48 which is vague and does not correspond with the site.

Chief Executive Response

The lands are currently zoned 'Industry/Enterprise/Employment in the Draft Monaghan County Development Plan 2025 – 2031. This zoning remains unchanged from the previous plan, the Monaghan County Development Plan 2019 – 2025.

The flood extents on the subject lands are based on detailed modelling by the OPW, published under the Catchment Flood Risk Assessment and Management (CFRAM) Programme in 2016. The Flood Maps have been developed to comply with the requirements of the European Communities (Assessment and Management of Flood Risks) Regulations 2010 to 2015 for the purposes of establishing a framework for the assessment and management of flood risks, aiming at the reduction of adverse consequences for human health, the environment, cultural heritage and economic activity associated with floods. The CFRAM study has identified that part of the subject lands fall within Flood Zone A and Flood Zone B. The extent of the flood risk identified, can be found in Appendix 19 Strategic Flood Risk Assessment, prepared in conjunction with the Draft Monaghan County Development Plan 2025 – 2031.

CFRAM data is not prepared by Monaghan County Council and therefore the Council has no authority to amend mapping contained within it.

The Strategic Flood Risk Assessment has been reviewed/ revised as per OPR recommendation; this data is reflected in the amended maps set out in the revised SFRA and the green 'Flood Risk Areas' have been removed from the draft zoning maps 2025-2031.

The development plan process includes several periods of public consultation throughout the two year review including a 10 week consultation period following the publication of the draft county Development Plan. The consultation period for the Draft Monaghan County Development Plan 2025 – 2031 ran from 5th September until 14th November 2024. There was a widespread advertisement campaign for the consultation period, in both the local print and audio media as well as regular posts on the local authority's social media channels.

Issues relating to insurance fall outside the remit of the planning process and cannot be considered as part of the development plan review.

Chief Executive Recommendation

The flood zone maps have been reviewed and amended in the revised Strategic Flood Risk Assessment and the green 'Flood Risk Areas' have been removed from the draft zoning maps 2025-2031.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-27</u>	Bernard Reilly	Dublin Road, Monaghan Town.	N/A

Summary of Submission & Issues Raised

- Submission requests the removal of a Flood Risk Area from the Rossmore Factory site, Dublin Rd, Monaghan Town as indicated on the Monaghan Town Zoning Map and retain the zoning as it currently existing in the Monaghan County Development Plan 2019 – 2025.
- Author of this submission is a business owner and local rate payer operating from the Rossmore Factory, Dublin Rd, Monaghan Town.
- Submission states that he has been operating at these premises for many years and that there has never been a single incident of flooding on the site.
- The submission raises concerns at the effect the Flood Risk Area has on his business, his ability to get insurance and his ability to make changes to how we operate in the future.
- The submission also raises concerns about the lack of direct communication in advance about such a severe proposal and also about the lack of information openly available on the County Council website about the scientific rationale behind the proposal and the limited time available to make a comprehensive submission.
- The submission refers to the SFRA Appendix in the Draft Monaghan County Development Plan 2019 – 2031, specifically to MTFRA48 which is vague and does not correspond with the site.

Chief Executive Response

The lands are currently zoned 'Industry/Enterprise/Employment in the Draft Monaghan County Development Plan 2025 – 2031. This zoning remains unchanged from the previous plan, Monaghan County Development Plan 2019 – 2025.

The flood extents on the subject lands are based on detailed modelling by the OPW, published under the Catchment Flood Risk Assessment and Management (CFRAM) Programme in 2016. The Flood Maps have been developed to comply with the requirements of the European Communities (Assessment and Management of Flood Risks) Regulations 2010 to 2015 for the purposes of establishing a framework for the assessment and management of flood risks, aiming at the reduction of adverse consequences for human health, the environment, cultural heritage and economic activity associated with floods. The CFRAM study has identified that part of the subject lands fall within Flood Zone A and Flood Zone B. The extent of the flood risk identified, and more information can be found in Appendix 19 Strategic Flood Risk Assessment, prepared in conjunction with the Draft Monaghan County Development Plan 2025 – 2031.

CFRAM data is not prepared by Monaghan County Council and therefore the Council has no authority to amend mapping contained within it.

The Strategic Flood Risk Assessment has been reviewed/ revised as per OPR recommendation; this data is reflected in the amended maps set out in the revised SFRA and the green 'Flood Risk Areas' have been removed from the draft zoning maps 2025-2031.

The development plan process includes several periods of public consultation throughout the two year review including a 10 week consultation period following the publication of the draft county development plan. The consultation period for the Draft Monaghan County Development Plan 2025 – 2031 ran from 5th September until 14th November 2024. There was a widespread advertisement campaign for the consultation period, in both the local print and audio media as well as regular posts on the local authority's social media channels.

Issues relating to insurance fall outside the remit of the planning process and cannot be considered as part of the development plan review.

Chief Executive Recommendation

The flood zone maps have been reviewed and amended in the revised Strategic Flood Risk Assessment and the green 'Flood Risk Areas' have been removed from the draft zoning maps 2025-2031.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-28</u>	Lynn Holland	Dublin Road, Monaghan Town.	N/A

Summary of Submission & Issues Raised

- Submission requests the removal of a Flood Risk Area from the Rossmore Factory site, Dublin Rd, Monaghan Town as indicated on the Monaghan Town Zoning Map and retain the zoning as currently exists in the Monaghan County Development Plan 2019 – 2025.
- Author of this submission is a business owner and local rate payer operating from the Rossmore Factory, Dublin Rd, Monaghan Town.
- Submission states that he has been operating at these premises for many years and that there has never been a single incident of flooding on the site.
- Submission queries the lack of substantial evidence to justify such a designation.
- The submission raises concerns at the effect the Flood Risk Area has on his business, his ability to get insurance and any plans for future improvements or expansions. Concerns are also raised about the flood risk affecting the site’s property value and limit opportunities for operational changes, which are crucial for the growth and adaptability of any business.
- The submission also raises concerns about the transparency of the planning process and the lack of direct communication with affected business owners prior to making this proposal public, as well as the insufficiently detailed rationale available for review.
- It does not appear that a thorough, site-specific assessment was conducted and there is a lack of due diligence, especially given the serious implications of this zoning change. There is also a limited time available to make a comprehensive submission.
- The submission refers to the SFRA Appendix in the Draft Monaghan County Development Plan 2019 – 2031, specifically to MTFRA48 which is vague and does not correspond with the site.

Chief Executive Response

The lands are currently zoned ‘Industry/Enterprise/Employment in the Draft Monaghan County Development Plan 2025 – 2031. This zoning remains unchanged from the previous plan, Monaghan County Development Plan 2019 – 2025.

The flood extents on the subject lands are based on detailed modelling by the OPW, published under the Catchment Flood Risk Assessment and Management (CFRAM) Programme in 2016. The Flood Maps have been developed to comply with the requirements of the European Communities (Assessment and Management of Flood Risks) Regulations 2010 to 2015 for the purposes of establishing a framework for the assessment and management of flood risks, aiming at the reduction of adverse consequences for human health, the environment, cultural heritage and economic activity associated with floods. The CFRAM study has identified that part of the subject lands fall within Flood Zone A and Flood Zone B. The extent of the flood risk identified, and more information can be found in Appendix 19 Strategic Flood Risk Assessment, prepared in conjunction with the Draft Monaghan County Development Plan 2025 – 2031.

CFRAM data is not prepared by Monaghan County Council and therefore the Council has no authority to amend mapping contained within it.

The Strategic Flood Risk Assessment has been reviewed/ revised as per OPR recommendation; this data is reflected in the amended maps set out in the revised SFRA and the green ‘Flood Risk Areas’ have been removed from the draft zoning maps 2025-2031.

The development plan process includes several periods of public consultation throughout the two year review including a 10 week consultation period following the publication of the draft county development plan. The consultation period for the Draft Monaghan County Development Plan 2025 – 2031 ran from 5th September until 14th November 2024. There was a widespread advertisement campaign for the consultation period, in both the local print and audio media as well as regular posts on the local authority’s social media channels.

Issues relating to insurance fall outside the remit of the planning process and cannot be considered as part of the development plan review.

Chief Executive Recommendation

The flood zone maps have been reviewed and amended in the revised Strategic Flood Risk Assessment and the green ‘Flood Risk Areas’ have been removed from the draft zoning maps 2025-2031.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-29</u>	Bernard Reilly, c/o Lynn Holland	Dublin Road, Monaghan Town	N/A

Summary of Submission & Issues Raised

- Submission relates to the Rossmore Factory site, Dublin Rd, Monaghan Town.
- Submission requests that the Local Authority reconsider the inclusion of the Flood Risk Area as indicated on the Monaghan Town Zoning Map and retain the zoning as currently exists in the Monaghan County Development Plan 2019 – 2025.
- Concerns are raised about the potential impact on the business and the apparent lack of substantial evidence to justify a designation.
- Author of this submission is a business owner and local rate payer operating from the Rossmore Factory, Dublin Rd, Monaghan Town.
- Submission states that he has been operating at these premises for many years and that there has never been a single incident of flooding on the site.
- Submission queries the lack of substantial evidence to justify such a designation.
- The submission raises concerns at the effect the Flood Risk Area has on his business, his ability to get insurance and any plans for future improvements or expansions. Concerns are also raised about the flood risk affecting the site's property value and limit opportunities for operational changes, which are crucial for the growth and adaptability of any business.
- The submission also raises concerns about the transparency of the planning process and the lack of direct communication with affected business owners prior to making this proposal public, as well as the insufficiently detailed rationale available for review.
- It does not appear that a thorough, site-specific assessment was conducted and there is a lack of due diligence, especially given the serious implications of this zoning change. There is also a limited time available to make a comprehensive submission.
- The submission refers to the SFRA Appendix in the Draft Monaghan County Development Plan 2019 – 2031, specifically to MTFRA48 which is vague and does not correspond with the site.

Chief Executive Response

The lands are currently zoned 'Industry/Enterprise/Employment in the Draft Monaghan County Development Plan 2025 – 2031. This zoning remains unchanged from the previous plan, Monaghan County Development Plan 2019 – 2025.

The flood extents on the subject lands are based on detailed modelling by the OPW, published under the Catchment Flood Risk Assessment and Management (CFRAM) Programme in 2016. The Flood Maps have been developed to comply with the requirements of the European Communities (Assessment and Management of Flood Risks) Regulations 2010 to 2015 for the purposes of establishing a framework for the assessment and management of flood risks, aiming at the reduction of adverse consequences for human health, the environment, cultural heritage and economic activity associated with floods. The CFRAM study has identified that part of the subject lands fall within Flood Zone A and Flood Zone B. The extent of the flood risk identified, and more information can be found in Appendix 19 Strategic Flood Risk Assessment, prepared in conjunction with the Draft Monaghan County Development Plan 2025 – 2031.

CFRAM data is not prepared by Monaghan County Council and therefore the Council has no authority to amend mapping contained within it.

The Strategic Flood Risk Assessment has been reviewed/revised as per OPR recommendation; this data is reflected in the amended maps set out in the revised SFRA and the green 'Flood Risk Areas' have been removed from the draft zoning maps 2025-2031.

The development plan process includes several periods of public consultation throughout the two year review including a 10 week consultation period following the publication of the draft county development plan. The consultation period for the Draft Monaghan County Development Plan 2025 – 2031 ran from 5th September until 14th November 2024. There was a widespread advertisement campaign for the consultation period, in both the local print and audio media as well as regular posts on the local authority's social media channels.

Issues relating to insurance fall outside the remit of the planning process and cannot be considered as part of the development plan review.

Chief Executive Recommendation

The flood zone maps have been reviewed and amended in the revised Strategic Flood Risk Assessment and the green 'Flood Risk Areas' have been removed from the draft zoning maps 2025-2031.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-30</u>	Peadar McCaffrey c/o Genesis Planning Consultants	Lands at Gallanagh, Monaghan Town	8

Summary of Submission & Issues Raised

The submission requests consideration of the subject lands as an Opportunity Site to include for the requested land uses:

Option 1: Industry, Enterprise & Employment; and

Option 2: An opportunity site with a key site objective for a nursing home/ healthcare facility with retirement housing.

The subject lands (0.5Ha.) are located to the northwest of Monaghan Town Centre, aligning the local road L1631 in the townland of Gallanagh. Road frontage services are available to facilitate development of the lands. An application for residential development was withdrawn under Plan Ref No. 07/2311.

It is submitted that this is an infill site, sequentially appropriate for development and should be zoned Residential A.

National Policy: NPF

- Extracts Objectives from the NPF which specifically relate to Monaghan Town such as Objectives 4, 5, 6, 7, 10, 11 and 35.

Regional Policy: Summary

The subject lands are appropriate as an Opportunity site to facilitate both:

- Option 1 (Industry, Enterprise, Employment) and as
- Option 2 (a nursing home/ healthcare facility with retirement housing) as envisaged by National and Regional Policy given:
 - Objectives 4, 5, 6, 7, 11, 35 and NSO 10 of the NPF are complied with
 - The development would see significant delivery of a Tier 1 serviced site which is sequentially appropriate as an infill site which has road frontage and services
 - the subject lands are appropriate for Industry/ Enterprise/ Employment zoning and as a nursing home/ healthcare facility as envisaged by the RSES under RPO 3.13
 - The zoning of the subject lands as an Opportunity site with a key site objective as a nursing home/healthcare facility in the forthcoming Monaghan CDP is consistent with the objectives set down by the RSES objectives RP0177 & RPO178
 - The zoning of the lands for either Option1 or Option 2 would be consistent with the recognised need under the Draft CDP to develop the economic potential of Monaghan Town.

Local Policy:

- Nursing Home and Healthcare In the context of the aforementioned extracts and the local policy context under both the current CDP and the Draft CDP we summarise the need and rationale for the land use zoning to enable a nursing home/ healthcare facility on the subject lands is several fold as per Page 16 of the Submission
- Industry, Enterprise and Employment In summary given the location being within Monaghan Town and proximate to existing lands zoned for Industry, Enterprise and Employment the zoning of the lands will achieve, in part, creating more jobs and socio- economic gain for the Town.

Site Context and Flood Risk

- the OPW flood mapping database for Monaghan Town and it is noted that a portion of the lands is subject to flood risk (1% AEP)
- a significant portion of the lands is not exposed to flood risk as the ground levels rise significantly above the river and flood plain levels
- Having reviewed the Strategic Flood Risk Assessment accompanying the Draft CDP it is noted that it has not considered/ assessed these lands
- It is submitted that in light of the requested zonings the SFRA should examine these lands and when considered in the context of being an infill parcel of lands it is appropriate for a zoning to be applied to the lands, and in due course a Site Specific Flood Risk Assessment can demonstrate how at application stage a development can be delivered and achieve compliance with the requirements of the Section 28 Flood Risk Management Guidelines-
- Finally to assist the Planning Authority we refer to a recent LRD permission which this practice has obtained planning consent on in Flood Zone A in Maynooth Town. As is demonstrated in this example flood risk can be managed and a design solution found and it is appropriate for zoning of lands in a flood plain where over- riding planning principles will achieve urban consolidation.

Delivery of lands for nursing home and healthcare facility

- Rationale for nursing home & healthcare facility
- National demographics
- Local demographics

Summary:

In the context of the above, the need and rationale for the land use zoning to enable community infrastructure on the subject lands is several fold:

- Monaghan Town has a higher percentage of population in the 65+ age cohort than the state and County Monaghan as a whole (see 4.3 below).
- The submitted research identifies that there are very limited vacancies and a severe supply shortage in terms of nursing home provision in the area; (source HIQA (hiqa.ie).
- The report commissioned by the Department of Health on ‘Potential Measures to Encourage Provision of Nursing Home & Community Nursing Unit Facilities Final Report to Department of Health’ identifies a need for 18,000 additional beds would arise by 2036.
- The Department of Health report also highlights the lack of available sites for nursing homes in urban areas, due to land area requirements and high land prices.
- A further report by BDO – “ Health’s Ageing Crisis: Time for Action – A Future Strategy for Ireland’ s Long Term Residential Care Sector” also identifies that the provision of residential care for our ageing population is rapidly heading for crisis.
- Most recently the HSE published the ‘Service Plan 2024’ and key priorities identified include the need to provide quality and safe residential and transitional care to meet the needs of older persons.
- Recent research from CBRE suggests there will be a loss of existing nursing home beds and facilities (estimated at 30% of existing stock) as a result of a combined introduction of new standards as well as infection control measures.

Recommended Zoning and Objectives

Proposed zoning (as per draft Monaghan CDP 2025-2031)

- The subject lands are currently designated as per the current Monaghan CDP 2019-2025 as Landscape Protection/ Conservation

Recommended zoning

Going forward as part of the 2025-2031 CDP it is requested that the lands be designated as an Opportunity site to facilitate both land uses as below:

- Option 1: Industry, Enterprise & Employment; and
- Option 2: An opportunity site with a key site objective for a nursing home/ healthcare facility with retirement housing.

Chief Executive Response

The submission requests that the subject lands be designated as an Opportunity site to facilitate land uses as below:

- Option 1: Industry, Enterprise & Employment; and
- Option 2: An opportunity site with a key site objective for a nursing home/ healthcare facility with retirement housing.

The submission lands (0.5Ha.) are located to the northwest of Monaghan Town Centre, in the townland of Gallanagh. The lands are within the settlement envelope and are zoned 'Landscape Protection/Conservation'. The subject lands are very close to the Blackwater River and a pond, and are mostly within an area of flood risk, determined using OPW CFRAM and adjoin lands referenced as MTFRA20, in Appendix 19 Strategic Flood Risk Assessment of the Draft Development Plan.

The submission lands are zoned and zoned 'Landscape Protection/Conservation' with the objective '*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*'.

It is requested that the zoning is amended to provide for an 'Opportunity Site' to facilitate land uses: 'Industry, Enterprise & Employment' and an opportunity site with a key site objective for a nursing home/ healthcare facility with retirement housing.

Having regard to the sufficient quantum of 'Industry, Enterprise & Employment' lands zoned in Monaghan Town, in more appropriate locations, and the location of the submission lands within a flood risk area, the rezoning of lands to 'Industry, Enterprise & Employment' or an Opportunity Site to facilitate vulnerable uses such as a nursing home/ healthcare facility with retirement housing is not considered appropriate in this instance.

The subject lands are located to the northwest periphery of Monaghan Town and are sequentially inappropriate lands for residential development. Furthermore, having regard to the use of the adjacent lands zoned as Industry, Enterprise and Employment, it is considered that residential development is not an appropriate use on the subject lands.

Therefore, it is considered reasonable that the subject lands are 'Landscape Protection/Conservation' to continue the provision of a flood risk avoidance measure.

Chief Executive Recommendation

No amendment recommended.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-33</u>	MON Commercial Holdings c/o Genesis Planning Consultants	Coolshannagh, Monaghan	9

Summary of Submission & Issues Raised

- Submission requests that Monaghan County Council amend the proposed zoning of the subject lands to 'Industry, Enterprise and Employment'.
- It is the clients intention to develop the subject lands for commercial purposes in the nearby future and bring additional employment to Monaghan Town.
- The subject lands are conveniently located adjacent to the existing public roads, offering direct access to the National Road network which has adequate capacity for any traffic generated from commercial uses.
- It is a strategically well-located site.

Historical Zonings

- Submission highlights the subject lands were zoned as 'Existing Commercial' under the 2013-2019 Plan.
- Submission considers that this historical zoning under the 2013 Development Plan correctly recognised the status of the existing lands with access readily available to the public road, adjacent, existing foul sewer and ESB connections available.
- Under the 2019 Monaghan County Development Plan a portion of the lands was then zoned as 'Landscape Protection'.
- Submission refers to the 2019 Chief Executives report, including the Chief Executive Response and Chief Executive Recommendation.
- Submits that the zoning under the 2019 CDP and assessment of Flood Risk does not merit the proposed zonings going forward under the 2025 Draft CDP.

Masterplan

- Submission refers to the accompanying Masterplan in Appendix 1 which sets out the vision for the lands to become a gateway development at the environs of the town, proximate to the N2.
- This Masterplan has been subject to pre-planning discussions with both the Planning Authority and Elected Members on various dates from 2019 to 2024. Pre-Planning discussions were supportive of the proposal in that that the Planning Authority recognise the strategic potential of lands to deliver both office accommodation and third level education building.
- One of the matters discussed was flood risk and it was accepted that the design proposal would have to respond to flood risk within /bounding the lands so that no vulnerable land uses would be exposed to flood risk.

Flood Risk

- The Planning Authority will note that a risk of flooding does not preclude the development of lands.
- Notwithstanding the marginal flood extent affecting a portion of the lands this does not preclude development of the lands.
- Submission refers to other lands in the Town which have a greater flood risk such as the Aldi site in Monaghan Town Centre
- Submission highlights a significant portion of the lands is not exposed to flood risk as the ground levels rise significantly above the river and flood plain levels.

- To demonstrate how the Masterplan can be delivered a site-specific flood modelling and Flood Risk Assessment have been carried out (Attached as Appendix to submission).
- In summary it is contended that the analysis demonstrates the majority of lands can be developed outside of a flood plain and for the portions of the site that remain within the flood plan a design solution can be found either as a landscape buffer or via compensatory storage
- Submit that given the strategic nature of the lands as a Gateway to the Town and also given a significant portion of the lands is outside the flood plain this is a scenario for the Development Plan Justification Test to be applied.
- Having reviewed the Strategic Flood Risk Assessment accompanying the Draft CDP we note it has not considered/ assessed these lands.
- Submit in light of our requested zonings the SFRA should examine same and when considered in the context of being an strategic parcel of lands it is appropriate for a zoning to be applied to the lands, and in due course a Site Specific Flood Risk Assessment can demonstrate how at application stage a development can be delivered and achieve compliance with the requirements of the Section 28 Flood Risk Management Guidelines.
- Submission refers to a recent LRD permission where planning consent has been obtained in Flood Zone A in Maynooth Town. This example demonstrates that flood risk can be managed and it is appropriate for zoning of lands in a flood plain where overriding planning principles will achieve urban consolidation and socio-economic growth.

Proposed zoning and related matters

- In respect of the Ulster Canal and the associated greenway as now established, the submission highlights that the Greenway is located overlapping the former tow-path.
- There is no established or likely 'amenity' benefit which will arise from subject lands being zoned as proposed.
- Given the greenway is now established there is no physical land-use requirement for the subject lands to be split between 'Industry, Enterprise and Employment' and 'Landscape Protection/Conservation'. This is evident given there are no defining site characteristics on-the-ground to merit different zonings between the subject land.
- Sub-dividing the subject lands between zonings (as proposed under the draft plan) renders the 'northern' aspect of the subject lands to be unviable for development purposes; given the associated restrictions imposed on the plot width.
- We submit any Landscape Protection/ Conservation zoning at this location should be commensurate with lands required to allow for the Greenway, the Ulster Canal and not result in loss of lands for landscape preservation; particularly when there are no landscape qualities or natural heritage features existing on our client's lands.

Summary

In summary the submission requests:

- That the Planning Authority amend the propose zoning of the subject lands to 'Industry, Enterprise and Employment'.

The submission states that the requested zoning is appropriate on several basis:

- The entirety of the subject lands were previously zoned for commercial purposes under both the 2007-2013 and the 2013-2019 County Development Plans. Previous zonings demonstrate the landscape assessment which was previously carried out by the Planning Authority and the correct zoning determination' made that the subject lands do not offer any amenity benefit.
- The Greenway is established. There is no physical land-use requirement for the subject lands to be split between 'Industry, Enterprise and Employment' and 'Landscape Protection/Conservation'. This is evident given there are no defining site characteristics on the ground to merit different zonings between the subject lands.

- Sub-dividing the subject lands between zonings renders the ‘northern’ aspect of the subject lands unviable for development purposes, given the associated restrictions imposed on the ‘plot width’.
- The subject lands are conveniently located adjacent to the existing public roads, offering direct access to the road network which has adequate capacity for any traffic generated from commercial uses.
- If a landscape buffer is required alongside the Canal/Greenway, this can be provided on lands to the eastern side of our client’s folio to a reduced width, ie between the Shambles River and the Canal/Greenway.
- The landowner intends to develop the subject lands for commercial purposes.

Submission includes two appendices:

- Appendix 1 – Masterplan Proposals
- Appendix 2 - Flood Risk Assessment

Chief Executive Consideration

The submission relates to mainly undeveloped greenfield lands close to the northern edge of the town, and also in close proximity to the bypass.

These lands were zoned for a variety of uses in the Monaghan County Development Plan 2019 – 2025, which reflected the existing uses and their potential for flood risk. The same zoning classes have been recommended within the draft Monaghan County Development Plan 2025 – 2031;

- Lands under commercial uses have an ‘*Existing Commercial*’ zoning
- Undeveloped lands, located outside any flood risk area, have been zoned ‘*Industry/Enterprise/ Employment*’
- Lands identified as being at flood risk have been zoned as ‘*Landscape Protection/Conservation*’

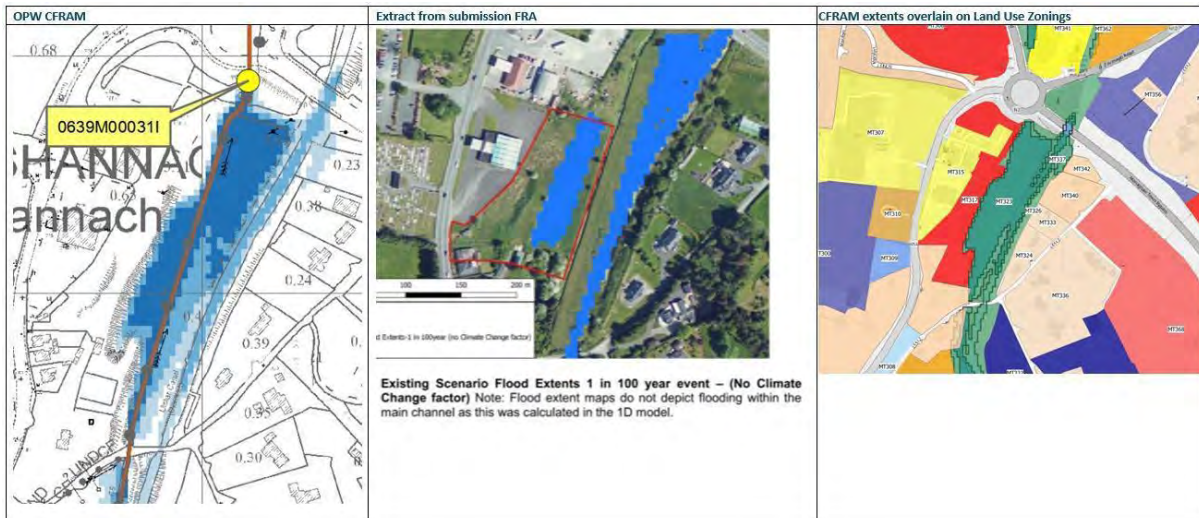
This submission requests that the subject lands be zoned in their entirety to ‘*Industry/Enterprise/ Employment*’. This would involve the following;

- The rezoning of a small portion of ‘*Existing Commercial*’ lands relating to an existing yard area, and
- The rezoning of a larger portion of undeveloped zoned ‘*Landscape/Protection/Conservation*’ lands

The subject lands offer the potential for the continued operation and expansion of the existing commercial activities, in addition to the possibility of developing other enterprise and employment uses.

Notwithstanding this, it must be noted that a portion of the subject lands are located within Flood Zone A and Flood Zone B (ie being lands that are at flood risk). The Planning Authorities hydrological consultants have confirmed that this assessment is based on OPW CFRAM data and as such is ‘the highest degree of confidence of any flood data used’.

The flood risk assessment lodged with the submission on behalf of the landowner also acknowledges that a portion of the site is a flood risk (*Flood Risk Assessment, FJ Coyle & Associates, November 2018*)



The draft Development Plan proposes zoning those portion of the subject lands which are at flood risk as Landscape Protection/ Conservation, the objective of which is to *'protect important landscape features from development that would detrimentally impact on the amenity of the landscape, on the natural setting of the towns, or the natural attenuation offered by flood plains'* (Zoning objective LUO10)

The Planning System and Flood Risk Management Guidelines for Planning Authorities (November 2009) introduced mechanisms for the incorporation of flood risk identification, assessment and management into the planning process. As part of the broader guidance contained within it, it states;

'Planning authorities will ensure that development is not permitted in areas at flood risk, particularly floodplains, except where there are no alternative sites available in areas of lower risk'

The zoning of that portion of the subject lands, which are at acknowledged flood risk, for industry/enterprise/employment uses would be inconsistent with the provisions of the above referenced guidelines.

The Office of the Planning Regulator in their submission to the draft Plan, specifically referenced the need to manage flood risk and directed the Planning Authority to NPO 57 of the NPF which requires the implementation of the above referenced guidelines.

For the reasons outlined above it is recommended that no amendments are made to the draft Plan, in so far as they relate to this submission.

Chief Executive Recommendation

No amendment recommended.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-37</u>	George McKenna c/o CS Pringle	Gallanagh, Monaghan	N/A

Summary of Submission & Issues Raised

Concern raised on the proposed bypass road running from the northeast of Monaghan Town to southwest, as shown on the MTDP1 Zoning Map.

Location

- Submits lands, proposed to be designated as ‘Strategic Residential Reserve’, will be seriously impacted by the proposed bypass road from the point ‘A’ to ‘B’ to ‘C’ and from ‘B’ to ‘D’ (as noted on Map 3 of submission).
- Submits that this will have an adverse effect on both dwelling house and farm.
- Submission acknowledges that the proposal is now in draft form, but wishes to make the submission so that observations and worries can be taken into account if and when this bypass road goes ahead.
- It is the opinion of the submitter that the route could be changed to a more economical design.
- Serious reservations as to why there is a second route planned from ‘D’ to ‘E’ (as annotated on Map 3 of submission).
- This will entail two crossings on the Scotstown Road at ‘C’ and at ‘D’ and the possibility of slip roads to accommodate the existing rural traffic will further expand the land take (as annotated on Map 3 of submission).
- There is a very good stretch of road on the N54 Clones Road between ‘F’ to ‘E’ (as annotated on Map 3 of submission).
- The possibility of roundabouts at points ‘C’ and ‘F’ would remove the necessity for route ‘D’ to ‘E’ (as annotated on Map 3 of submission).

Alternative Route

- Submission requests that a modified route be considered.
- There is a 400mm diameter Local Authority Mains Water Pipeline running through submitters lands, suggested that the line of this Water Main would be more appropriate as it more or less follows the existing drain through these lands.
- Prior to crossing the Gallanagh Road the proposed bypass road proposes to come across the hills on the western side of the old Poultry Products site, coming down from hills and into the flat meadows of the submitters farm.
- Requests that Monaghan County Council Roads Department to engage with him to discuss possible alternatives.

Adverse Effect on Farm

- Concerns raised as to the amount of take that will be necessary to construct this road.
- Without knowing the full details of this road design, the alternative proposals are for discussion purposes at this stage.
- There is a fork type ‘V’ junction planned in the middle of one of the farms best fields, the extent of the take here could be quite extensive.
- This proposal could split this farm into three pieces.
- With two crossing planned on Scotstown road how will the Scotstown/Ballinode/North Monaghan traffic be catered for?

Road Design

Submission raises the questions:

- Has this bypass Road been designed yet?
- If so, are these drawings and plans available for inspection?

Submission states the following concerns in regard to the present plan:

- I) Vibration, noise, dust upset regarding the very close proximity of this proposed bypass Road to present residence.
- II) How this will affect the value of residential property.
- III) How it will affect the biodiversity of this whole area.
- IV) How it will impact on the visual character and cultural heritage of this whole area.
- V) The environmental impacts that this major project will have on this whole area.
- VI) The impact that this will have on submitters business.
- VII) The impact it will have on his quality of life.
- VIII) The impact it will have on existing traffic routes.

Devaluation of Property

- The proposed bypass road being included within the Draft County Development Plan 2025-2031 has caused an immediate devaluation of submitters property.
- Submitter was not aware of the proposed bypass road until recently and was not aware that it formed part of previous development plans.
- Has never been consulted in regards to the proposed bypass.
- Will be curtailed from planning any new development on lands that might in any way affect this bypass road.

Conclusion

- Acknowledgement that progress must be made for the benefit of all in the forward planning of such roads.
- Aware that this submission may be at a very early stage in the process, however, there has been no consultation in relation to this burden being planned for their property and would therefore like an update from the Council for a possible timeline for this project.
- Requests to be consulted on the plans and design for this road so that an amicable agreement can be reached to satisfy all concerned.

Chief Executive Response

The comments made within this submission relate to an indicative road scheme as shown on map MTDP1.

As confirmed by Monaghan County Councils Road Design Section, the proposed project will be required to progress through a phased design process, which will involve a feasibility study, constraints, environmental evaluation and design. Public consultation and stakeholder engagement will be a part of this process.

Proposals will also need to consider how this proposed link road will interact with or affect other objectives of the County Development Plan, including active travel, road safety and urban regeneration. The design process will not commence until funding becomes available, and will be undertaken in line with relevant transport planning guidelines, as outlined in section 7.3.1 and 7.3.4 of the draft County Development Plan.

Chief Executive Recommendation

No amendment recommended.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-45</u>	Brendan Sherlock	Dunsinare, Monaghan Town	10

Summary of Submission & Issues Raised

- The submission requests that the subject lands are included within the settlement limit of Monaghan Town.
- The submission notes that the subject lands could be made available for housing or for the development of a retirement village.
- The submission states that the subject lands comprise 10 acres and were previously zoned for residential purposes. The lands are located 2km from Monaghan Town centre and are within close proximity to an existing nursing home and directly opposite a service station and shop.

Chief Executive Response

The submission requests the inclusion of lands within the settlement envelope of Monaghan Town.

The Core Strategy of the County Development Plan recognises the role of settlements in driving the development of the County but also identifies the scope of development possible for the County, while remaining consistent with National and Regional policy. The Core Strategy also identifies the quantum and location of development for the plan period, consistent with the population targets and settlement hierarchy that reflects the availability of existing services, planned investment, sequential development and environmental requirements.

The subject lands are located on the periphery of Monaghan Town, 1.6km south of the edge of the town centre and the inclusion of same would not contribute to the compact growth of the town. There are sufficient lands located within the existing settlement footprint of Monaghan Town which are suitable for residential development in more sequentially appropriate locations to meet the projected population increase over the plan period.

Whilst the Development Plan notes that the demand for retirement villages have grown as life expectancy has increased, it considers that such services should be located within the designated Tier 1-3 settlements of the County where public utilities are available and opportunities for greater social integration and inclusion to the community exist. As a result, it is noted that the provision of retirement villages is 'open for consideration' on 6 different land use zonings categories within the main towns. It is therefore considered that adequate lands are zoned within the main County towns to accommodate future retirement home developments.

On this basis, it is recommended that the subject lands are not included within the settlement envelope of Monaghan Town.

Chief Executive Recommendation

No amendment recommended.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-53</u>	McGuigan Builders Hughes Planning & Development Consultants	Lands at Drumbear, Monaghan Town	11

Summary of Submission & Issues Raised

The submission requests the rezoning of lands from ‘Residential B’ to ‘Residential A’.

Introduction

- It is considered appropriate and in accordance with the core principle of proper planning and sustainable development, to rezone the submission lands from the existing ‘*Residential B*’ to ‘*Residential A*’ land use zoning

Comparison of Recent, Draft and Suggested Zoning Maps

- It is noted that the subject lands have been rezoned from the existing zoning of ‘*Strategic Residential Reserve*’ (MCDP 2019-2025) to ‘*Residential B*’ (Draft MCDP 20225-2031).
- The acknowledgement of the Local Authority that these submission lands are suitable for residential development is wholly welcomed, however having regard to their location it is considered that medium density development can comfortably be accommodated on these lands, and the Residential A zoning would be more fitting in this instance.
- The subject lands are located within the environs of Monaghan Town. Monaghan Town is the county town of County Monaghan, a border county with Northern Ireland, and the largest town within Monaghan with a population of c. 8,000.
- The subject lands are located within an existing residential area of Monaghan Town, that is well-connected, easily accessible and well-serviced with infrastructure, facilities and amenities.
- The lands are surrounded by existing residential neighbourhoods, and so, the zoning of this land for residential use would support the sustainable development and consolidation of Monaghan Town Centre/Environs.

Submission Lands

- The site subject pertaining to this submission is located in the Townland of Drumbear, extending to approximately 2.31 hectares. It is bordered to the north by an established high-density residential neighbourhood, to the east and south by open spaces and low-density housing, and to the west by Cootehill Road, a key arterial route providing direct access to Monaghan Town Centre.
- Situated just 1.8 km from Monaghan Town Centre, the site benefits from proximity to a wide range of shops, services, and amenities. Within a 500m radius, there is a blend of residential properties, local amenities, and open spaces. Within a short 3-minute drive, residents can access essential services including a Spar supermarket, a fitness centre, a church, a nursing home, and a petrol station (figure 6.0).
- The site is positioned within an established residential area, making it ideally placed to contribute to the continued growth of the town. Its current undeveloped state presents an opportunity to meet housing demand in line with the evolving settlement pattern of the area.
- Given its location, the site is poised to become a natural extension of the surrounding residential development, offering excellent potential for high-quality housing that complements the character and amenity of this well-established neighbourhood.
- the submission site is directly adjacent to an existing residential estate and should therefore be prioritised for future high-density residential development.

- The rezoning of the submission lands to *'Residential A'* will provide consolidation of the lands that are situated in a prime location proximate to Monaghan town centre.
- the submission lands are surrounded by primarily residentially zoned lands, thus, residential development at the submission lands would further enhance and support the consolidated growth of the area zoned as residential.

Planning Context of the subject land

MCDP 2019-2025

- The Monaghan County Development Plan 2019-2025 identified three primary land use zoning objectives with regards to the delivery of future residential development Proposed Residential A, Proposed Residential B and Strategic Residential Reserve
- It is noted, having regard to the variations to the Monaghan County Development Plan 2019-2025 which have occurred in the interim period following the adaptation of this plan, that almost 25 hectares (24.84) of lands subject to the Strategic Residential Reserve within Monaghan Town have since been de-zoned thus limiting the extent of land suitable for residential development within the town
- With regards to the subject lands, we note that under the provisions of the current Monaghan County Development Plan 2019-2025, the submission lands are zoned *'Strategic Residential Reserve'*.

Draft MCDP 2025-2031

- Under the Draft Monaghan County Development Plan 2025-2031, the submission site has been rezoned *'Residential B'*
- Monaghan Town is designated as the only Tier 1 'Principal / Key Town' within Monaghan in the Draft Monaghan County Development Plan 2025-2031
- It is of note that the land uses listed above for *'Residential B'* restrain these lands from being developed at an appropriate medium density, and from contributing to the consolidation of residential development in Monaghan Town. It is considered that the draft land use zoning objective for the submission lands is considered overly restrictive and based on their location, the submission lands can comfortably accommodate a medium density development.
- Submission cites Policies and Objectives from the Draft MCDP 2025-2031 that support the submission including MTSO1, CCSO1, CSO1 and the Core Strategy

Submission Request

In summary, this submission requests that Monaghan County Council considers the following:

That the submission lands zoned 'Residential B' under the Draft Monaghan County Development Plan 2025-2031 be rezoned to 'Residential A'.

Development Context

- The subject site is directly accessible via Cootehill Road presenting considerable road frontage of c.60m, and as such, can be developed swiftly subject to planning permission being obtained.
- Our client is eager to develop the site and, subject to the retention of the Residential zoning objective, would be willing to engage with the Planning Authority to prepare plans for future residential development.
- It is however strongly considered that any future low-density development of these lands would represent an inefficient use of serviceable and accessible lands which are within a short walking distance of many key services and facilities.
- We therefore respectfully ask that the zoning of the submission lands in the final iteration of the 2025-2031 Development Plan, be appropriately upgraded to Residential A.

Access

- The site is very accessible as it already comprises an entrance off the R188 (Cootehill Road) and only a 6-minute drive or 30-minute walk to Monaghan Town Centre
- With regards to the accessibility of public transport, it is noted that the site is situated within c.2km of the Monaghan Bus Depot which has services to and from Belfast, Armagh, Derry, and Dublin City Centre.
- Public transport services are available via Ulster Bus and Goldline Express bus nos. X3, 70, 70a, 270, 270u, 271, and 278, as well as local bus nos. 175 and MN2, which are within a 10-minute walk of the site.
- The availability of reliable public transport services within such close proximity to the subject site is seen as the principal factor with regard to its zoning to provide for residential development.
- The use of the site to accommodate a planned and co-ordinated residential scheme in place of existing green space will allow for the greater use of existing public transport services and will support the economic growth of these services as well as the growth of Monaghan Town as a Strategic Growth Settlement Town, in line with regional policies.
- Enniskillen Airport, also known as St. Angelo Airport, is c.55-minute drive from the subject site providing National and European flights.
- In addition to public transport services, the subject site is situated a 1 hour-40-minute drive from Dublin.
- There are multiple journey options available including the N2 - M1 - Dublin, the N2 – Dublin, or the M1 – Dublin. Moreover, Galway city centre is situated a c. 2 hour-57-minute drive from Monaghan Town and is accessible via the N55 – M6 – Galway or the N55 – Galway.
- Considering the above, it is considered that the submission lands are extremely accessible via public transport and by car, which is favourable for residential development.

Local Services

- Upon review of the area which indicates the subject's site location within Monaghan town centre, it is considered the subject site would be underutilised as an area of lower-density housing to its location in proximity of the town centre and the services available.
- It is thus requested that Monaghan County Council rezone the land in its entirety to 'Residential A' zoning.
- The recreational facilities within the immediate area include Coral Leisure, The Peace Link Sports Facility, Monaghan Leisure Complex, and Rossmore Forest Park. The Monaghan Shopping Centre is a 6-minute drive or a 30-minute walk from the submission site.
- Further to this, there is an abundance of national and secondary schools within the vicinity. As shown in Figure 35.0, there are several schools within a 5-minute drive of the submission lands, St. Louis Secondary School is situated a c. 2-minute drive or c. 22-minute walk from the subject site; and St. Louis Girls School, St. Louis Infant School, St. Mary's Boys School, and Beech Hill College are all a c. 4-minute drive or c. 29-minute walk from the submission site.
- The development of the subject site presents an opportunity to guide the location of the future development of Monaghan Town to the centre of the immediate area within close proximity to existing amenities and public transport services.

Infrastructure

- It is noted that the submission lands are adequately serviced by wide, urban streets.
- Infrastructure is already in place on the existing residential lands to the North and South which would be capable of serving future residential expansion of a similar type of development.

Planning Policy - National Level

Regional Spatial and Economic Strategy for the Northern and Western Region

- The RSES designates Monaghan Town as a Key Town which occupies a strategic border location along the Dublin to Letterkenny/ Derry City corridor, and adjacent to the Dublin/Belfast eastern economic corridor.
- The RSES recognises the strategic development potential of Monaghan Town due to the availability of industry, enterprise and employment zoned lands and its proximity to Dublin.
- With regards to population growth, the RSES identifies that growth within the town is to be targeted at the delivery of compact growth with a mix of housing densities and plot ratios necessary due to the difficult topography of the town.
- As the submission site is located within the centre/environs of Monaghan Town, it is considered that the rezoning of the site to provide residential units is compliant with the Regional Spatial and Economic Strategy for the region as it will be providing much-needed accommodation within an existing built-up area within a Key Town.

Project Ireland 2040 – National Planning Framework

10 no. National Strategic Outcomes as follows:

1. Compact Growth

The submission site is located within the centre of Monaghan Town; thus it is located within close proximity to existing transport infrastructure including Bus Eireann bus services. We consider it representative of an appropriate location for residential development and the consolidation of this area. The development of the site allows for increased permeability within the immediate area and for the increased viability of existing local community infrastructure.

2. Enhanced Regional Accessibility

The subject site is located within 2km of Bus services available via The Monaghan Bus Depot on North Road. As such, it is considered that the subject site is well serviced by public transport offering direct access to larger urban centres at Dublin, Armagh, Belfast, and Derry..

3. Strengthened Rural Economies and Communities

The development of the submission site presents a direct opportunity to consolidate development within the centre of Monaghan Town. A significant residential development at this location will result in the increased viability of commercial services within the immediate area and presents the potential for the further expansion of Monaghan Town.

4. Sustainable Mobility

In compliance with national policy guidance, the co-ordinated development of the submission site would ensure that all built form is constructed to the highest architectural standard and is suitably energy-efficient and equipped for challenges anticipated from a changing climate.

5. A Strong Economy supported by Enterprise, Innovation and Skills

The development of the submission site and associated consolidation of Monaghan Town could result in a heightened extent of commercial development, enterprise and innovation within the town in the future which would diversify and strengthen the local community.

6. High Quality International Activity

Monaghan Town is both strategically located and served by infrastructure so as to represent a unique location for the development of a sustainable urban centre. Whilst the development of this area will have no direct impact on international competitiveness, it is considered that the guided development of Monaghan Town and Monaghan more broadly, presents an opportunity to set an international precedent for sustainable development.

7. Enhanced Amenity and Heritage

The development of the submission site presents a direct opportunity to improve permeability within the immediate area through the improvement of the existing underutilised green fields into residential development with adequate amenity space and open space.

8. Transition to a Low Carbon and Climate Resilient Society

As stated previously, all built forms within the submission site will be suitably energy-efficient and equipped for challenges anticipated from a changing climate.

9. Sustainable Management of Water, Waste and other Environmental Resources

Any development of the submission site would be in line with the principles of Irish Water and the sustainable management and development of the area.

10. Access to Quality Childcare, Education and Health Services

The subject site is situated within proximity to various primary and secondary schools as detailed in Figure 36.0 of this report. Furthermore, with regard to local amenities, it is noted there are a range of local shops, restaurants, public houses and services available in the town. The further development of the area and associated increase in population growth is considered necessary to provide an economic justification for the provision of improved recreational and educational services with the provision of shopping facilities generally calculated on the extent of the local population available to avail of such services.

It is thus submitted that the subject site, which would be considered an underutilised agricultural site, would be best utilised by residential development and would therefore be consistent with the provisions of the National Planning Framework.

5.2.1 National Planning Framework Review

- The draft revisions of the NPF identifies an increased national population growth target of 6.1 million residents by 2040
- In the context of this submission, that the Northern and Western Region (NWRA) is expected to accommodate 10% of this increase in population growth with the population of the region expected to rise by 150,000 between 2022 and 2040 to a total of 1million.
- The draft revision notably reaffirms the focus on renewing and developing existing settlements as established under the NPF 2018, rather than allowing the continual expansion and sprawl of cities and towns out into the countryside, at the expense of town centres and smaller villages. The target is for at least 40% of all new housing to be delivered within the existing built-up areas of cities, towns and villages on infill and/or brownfield sites. The rest of our homes will continue to be delivered at the edge of settlements and in rural areas.
- With regards to key changes between the NPF 2018 and the draft revision, it is noted that number of houses required per annum has increased from between 30-35,000 per annum to a total of 50,000. Whilst this change is considered to reflect the ongoing housing crisis within the country it is noted that the document makes no specific reference to changing household sizes or increased demand for housing.
- The draft revision also places greater emphasis on land activation and active land management to ensure transport orientated development (TOD) opportunities are realised at greenfield and brownfield sites adjacent to public transport hubs. The revision makes reference to the creation of measures such as the Residential Zoned Land Tax and Land Value Sharing with the purpose of such tools being to better manage the supply of development land, to meet housing land requirements, ease pressure on building land and housing costs and to capture gains in land value from the development process for investment in necessary public infrastructure.

Urban Development and Building Heights - Guidelines for Planning Authorities, December 2018

- These guidelines are intended to set out national planning policy guidelines on building heights in relation to urban areas, as defined by the census, building from the strategic policy framework set out in Project Ireland 2040 and the National Planning Framework. The guidelines outline that there is significant scope to accommodate anticipated population growth and development needs, whether for housing, employment or other purposes, by building up and consolidating the development of our existing urban areas.
- It is considered that the subject site is appropriately located so as to accommodate a residential development of appropriate density within the centre of Monaghan in close proximity to existing public transport services and amenities. The design of any future development can respond to the topography of the area and the nature of the existing built

form so as to limit any impacts on existing amenities. The site is located within the centre of the immediate area and presents a direct opportunity to consolidate and guide the future growth of the area in a manner that limits the need for unsustainable commuting patterns and improves the sense of community and safety within the wider area. The development of the site is thus considered to be appropriate in the context of the Urban Development and Building Heights - Guidelines for Planning Authorities, December 2018.

Quality Housing for Sustainable Communities – Guidelines for Planning Authorities

- The purpose of these Guidelines is to assist in achieving the objectives for Delivering Homes, Sustaining Communities contained in the Government Statement on Housing Policy which focuses on creating sustainable communities that are socially inclusive by promoting high standards in the design and construction and in the provision of residential amenity and services in new housing schemes.
- The subject site is located within the centre of Monaghan and is situated within 2km of the Monaghan Bus Depot as well as local bus services.
- Residential development on the subject site would allow for the greater utilisation of these existing services and would allow for the formation of a strong community within the centre of Monaghan Town in accordance with the provisions of the Quality Housing for Sustainable Communities – Guidelines for Planning Authorities (2007).

Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024)

- As of January 2024, the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities supersede the Sustainable Residential Development in Urban Areas (2009).
- With an emphasis on sustainable residential development and the formation of compact settlements, the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities establish national planning policy and guidelines pertaining to the planning and development of urban and rural settlements. Under said guidelines, settlement types are categorised on their area types and are allocated a guiding density range. With the subject site being located in Monaghan Town, this means it can be described under the 'Key Towns and Large Towns (5,000+ population)'. The key priorities for such towns, in order of priority, are to:
 - a) plan for an integrated and connected settlement overall, avoiding the displacement of development generated by economic drivers in the Key Town or Large Town to smaller towns and villages and rural areas in the hinterland,*
 - (b) strengthen town centres,*
 - (c) protect, restore and enhance historic fabric, character, amenity, natural heritage, biodiversity and environmental quality,*
 - (d) realise opportunities for adaptation and reuse of existing buildings and for incremental backland, brownfield and infill development, and*
 - (e) deliver sequential and sustainable urban extension at locations that are closest to the urban core and are integrated into, or can be integrated into, the existing built up footprint of the settlement.*
- Compact growth has been recognised as key to the renewal of existing settlements, with an overall goal to reduce continued sprawl. The subject guidelines recognise the benefit of consolidation which improves access to services, ensures efficient use of land and allows for greater integration with existing infrastructure and public transport. It is accepted that compact growth is essential, particularly along transport corridors that support the more efficient use of energy and contribute to the achievement of net zero carbon emissions and other climate action targets by 2050.

- As a final point, it is considered that the location of the subject site is representative of 'Key Town / Large Town - Suburban/Urban Extension' as defined under Table 3.5 'Areas and Density Ranges Key Towns and Large Towns (5,000 population)' of the subject guidelines. In this regard we would note the following commentary as it relates to the appropriate density range for development at such locations:
'Suburban areas are the low density car-orientated residential areas constructed at the edge of the town, while urban extension refers to greenfield lands at the edge of the existing built-up footprint area that are zoned for residential or mixed-use (including residential) development. It is a policy and objective of these Guidelines that residential densities in the range 30 dph to 50 dph (net) shall generally be applied at suburban and urban extension locations of Key Towns and Large Towns, and that densities of up to 80 dph (net) shall be open for consideration at 'accessible' suburban / urban extension locations'
- A residential development upon the subject site in compliance with the above density range would comprise a scheme of between 69-116 dwellings. The development of the subject site to provide density in line with the guidance provided within the Compact Settlements Guidelines is considered appropriate to ensure the sequential development of Monaghan Town and the appropriate consolidation of the towns development boundary. The density range identified for lands such as those which are the subject of this submission of 30-50dph net represents a mid-density range, and thus the upgrade of the zoning to Residential A would ensure that this density target is achievable and further that any future development on the site would comply with the national policy direction, which seeks densification at appropriate locations.

Conclusion

- This submission is prepared in response to the Draft Monaghan County Development Plan 2025-2031 which has been prepared in replace of the existing Monaghan County Development Plan 2019-2025.
- In summary, this submission requests that Monaghan County Council consider the following:
- *That the submission lands zoned 'Residential B' under the Draft Monaghan County Development Plan 2025-2031 be rezoned 'Residential A'.*
- We request that the recommendations of this submission be given full consideration in preparation for the forthcoming Monaghan County Development Plan 2025-2031. As presented throughout this report, the landholding to which this report pertains is located within the centre of Monaghan Town, the strategically located and serviced county town of Monaghan.
- The town is serviced by multiple bus services which provide frequent and reliable high-capacity service to Dublin City Centre and other employment across Ireland. The site is surrounded by high-density housing on Cootehill Road and would be suited for further high-density housing to consolidate the area and support the growth of Monaghan town centre.
- The Draft Monaghan County Development Plan 2025-2031 has rezoned the existing zoning of 'Strategic Residential Reserve' to 'Residential B'. However, we believe that the land provides a critical opportunity for medium/high-density development due to its proximity to town centre and the existing settlement pattern in the vicinity; therefore, it should be zone 'Residential A' in the new Monaghan Development Plan 2025-2031.
- We consider that the submission lands are entirely suited for Residential land use zoning given the location of the land within an existing residential area in the centre of Monaghan Town and given the increase in population across the country. It is strongly recommended the submission lands in their entirety be zoned 'Residential A' as they are ideally located within the centre of Monaghan Town, close to services, amenities, public transport, and residential development on this land would further support the growing population of Monaghan Town and County Monaghan as a whole.

Chief Executive Response

The submission requests the rezoning of lands from 'Residential B' to 'Residential A'.

The submission lands are located at Drumbear, Monaghan Town, to the east of Cootehill Road and south of Drumbear Housing Estate, with access onto the Regional Road R188. The lands are on the southern periphery of the Settlement Envelope, are Tier 1 'Serviced Zoned Land' and are zoned 'Proposed Residential B' in the Draft Plan. A small portion of the submission lands are at risk of flooding.

It is requested to rezone lands from 'Proposed Residential B' to 'Proposed Residential A'. The Core Strategy of the Development Plan recognises the role of settlements in driving the development of the County and identifies the scope of development possible for the County, while remaining consistent with National and Regional policy. It also identifies the quantum and location of development for the plan period, consistent with the population targets and settlement hierarchy that reflects the availability of existing services, planned investment, sequential development and environmental requirements.

Whilst it is acknowledged that the Tier 1 lands have services available to them, the subject lands are located on the edge of Monaghan Town, south of the town centre.

Having regard to the Strategic Flood Risk Assessment, a small portion of the submission lands, referenced as MTFRA 35, are at risk of flooding. The OPR submission recommended that the MTFRA 35 site be reviewed as a result of its location within Flood Zone A and / or B. It also recommends that where the lands do not pass the Plan Making Justification Test, rezone such lands in Flood Zone A for water compatible use, and in Flood Zone B for water compatible or substitute for a land use appropriate to the level of flood risk. Based on the data available, it is considered appropriate to rezone the Proposed Residential B Flood Risk Area to Landscape Protection/Conservation as a flood risk avoidance measure.

Based on the peripheral location of the subject lands, c2km from the town centre, it is recommended that the subject lands are dezoned to facilitate the inclusion of more appropriate lands.

Chief Executive Recommendations

It is recommended that the lands are zoned 'Strategic Residential Reserve'.

It is recommended that the flood risk area be zoned 'Landscape Protection/Conservation'.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-55</u>	Dermot McNally	Dublin Road, Monaghan Town.	N/A

Summary of Submission & Issues Raised

- Submission relates to the Rossmore Factory site, Dublin Rd, Monaghan Town, specifically to a 'Flood Risk Area' denoted on the map.
- Submission is made by the owner of the commercial buildings namely the Rossmore Factory, Dublin Rd.
- The submission states that a manufacturing facility has existed on site since 1962 and since then there has never been a single incident of fluvial flooding onsite.
- The submission raises concerns at the effect the Flood Risk Area has on his business, his ability to get insurance and any plans for future improvements or expansions.
- A CAD topographical survey has also been submitted which confirms levels on the entire site.
- No Flood Risk Area indicated on previous Development Plans.
- SFRA commissioned by Monaghan Co Co and carried out by McCloys and which informed current proposed changes to flood risk zoning, did not include site specific surveys and this is a clear limitation to the methodology.
- The submission states that if a genuine flood risk existed on my site then the vast majority of those parts of adjacent lands, including graveyards, which are not already zoned at flood risk, would also be vulnerable.
- This submission requests that the proposed Flood Risk Area is withdrawn from the draft Development Plan 2025 to 31 and leave the zoning as it is in current plan.
- The submission includes a Flood Risk Assessment carried out by RPS Group which shows that this site is not at flood risk even in extreme scenarios.
 - The purpose of the Initial Flood Risk Assessment is to confirm the sources of flooding that may affect a site, to appraise the adequacy of the existing flood risk information and to scope the extent of the risk of flooding.
 - Comparison of the CFRAM predicted flood levels and site topographical levels shows that the building would not be located within the 1% AEP or 0.1% AEP flood extents.
 - The building would therefore be considered to be in Flood Zone C, low probability of flooding.

Chief Executive Response

The lands are currently zoned 'Industry/Enterprise/Employment in the Draft Monaghan County Development Plan 2025 – 2031. This zoning remains unchanged from the previous plan, Monaghan County Development Plan 2019 – 2025.

The submission includes a Flood Risk Assessment carried out by RPS Group which shows that this site is not at flood risk even in extreme scenarios. However, per the published CFRAM study, 0.1% AEP water levels at the site are predicted to range from 65.85mOD upstream of the site to 63.53mOD downstream. Minimum site elevations in the submitted topographic survey of 63.35m do not preclude the potential for flood risk at the site.

The flood extents on the subject lands are based on detailed modelling by the OPW, published under the Catchment Flood Risk Assessment and Management (CFRAM) Programme in 2016. The Flood Maps have been developed to comply with the requirements of the European Communities (Assessment and Management of Flood Risks) Regulations 2010 to 2015 for the purposes of establishing a framework for the assessment and management of flood risks, aiming at the reduction of adverse consequences for human health, the environment, cultural heritage and economic activity

associated with floods. The CFRAM study has identified that part of the subject lands fall within Flood Zone A and Flood Zone B. The extent of the flood risk identified, and more information can be found in Appendix 19 Strategic Flood Risk Assessment, prepared in conjunction with the Draft Monaghan County Development Plan 2025 – 2031.

CFRAM data is not prepared by Monaghan County Council and therefore the Council has no authority to amend mapping contained within it.

The Strategic Flood Risk Assessment has been reviewed/revised as per OPR recommendation; this data is reflected in the amended maps set out in the revised SFRA and the green 'Flood Risk Areas' have been removed from the draft zoning maps 2025-2031.

Issues relating to insurance fall outside the remit of the planning process and cannot be considered as part of the development plan review.

Chief Executive Recommendations

The flood zone maps have been reviewed and amended in the revised Strategic Flood Risk Assessment and the green 'Flood Risk Areas' have been removed from the draft zoning maps 2025-2031.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-56</u>	McGuigan Builders, c/o Hughes Planning and Development Consultants	Newgrove, Monaghan	12

Summary of Submission & Issues Raised

Request that lands zoned Landscape Protection/Conservation be rezoned to Industry, Enterprise and Employment.

Proposed justification – lands are located within the environs of Monaghan Town. The client has great interest in developing these lands for an extension of the existing industrial use. There is much needed commercial related floorspace. All existing units are occupied. The site is fully serviced.

Submission references Core Strategy Principal/Key Town objective SHO 1 recognising Monaghan at the top of the settlement hierarchy and to ensure population and development growth in an orderly and sustainable manner. Submission also references Monaghan Town Settlement Plan objectives in respect of position in the settlement hierarchy and growth (MTSO 1) and to promote the town as a key industrial and employment centre of the county (MTSO 8), along with other supporting settlement strategy and Industry Enterprise and Employment objectives, CSSO 1, IEO 1-6.

References planning permission granted in 2006 (ref. 06/379) which would have proceeded only for the economic downturn.

Flood Risk: a Site-Specific Flood Risk Assessment (SSFRA) was undertaken in 2019 for a previous proposal to extend the existing development. The screening assessment indicates that the site is not at direct risk of flooding due to 10% AEP (1 in 10 year) with minor effect from 1% (1 in 100 year) fluvial flood event in the Conawary Stream.

Submission states, In consideration of the findings of the SSFRA, and in the context of the 2009 Flood Risk Management Guidelines the site of the proposed development falls within Flood Zone B. The flood risk to and from the proposed development site is considered to be relatively low and development of the site is not expected to result in an adverse impact to the hydrological regime of the area or to significantly increase flood risk elsewhere.

Planning Policy Context: references NPF and RSES in support of growth and industry and employment.

Chief Executive Response

The Planning Authority acknowledges the importance of available zoned lands to support population, employment and economic growth.

The subject lands are at risk of flooding as identified in the Strategic Flood Risk Assessment and it would therefore be contrary to Planning System and Flood Risk Management Guidelines 2009 and sustainable development.

The Draft zoning of Landscape Protection/Conservation is considered appropriate as a flood risk avoidance measure.

Chief Executive Recommendation

No amendments recommended.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-57</u>	Paul Gilsean	Lands at Coolshannagh, Monaghan Town	13

Summary of Submission & Issues Raised

The submission request is tri-fold, as follows:

- Retain Proposed Residential A and amend the Land Use Zoning Matrix to facilitate "Camping/Caravan Park" to be "Open for Consideration"
- Alternatively, rezone the site from 'Proposed Residential A' to 'Strategic Residential Reserve' and amend the Land Use Zoning Matrix to facilitate "Camping/Caravan Park" to be "Open for Consideration "
- Failing both these requests, rezone the site 'Recreation and Amenity'

The landowner would like to establish an Urban Glamping Site on the land for the following reasons:

- site is in an ideal location for such a business with its close proximity to both Monaghan Town and the Ulster Canal Greenway
- it will help achieve the Tourism Strategy as outlined within the Development Plan, it will increase much needed bed spaces within Monaghan Town and will provide both economic and social advantages to all sectors in the area, the lands close proximity to the greenway offers tourists, current connectivity to Rossmore Park and in the near future, connectivity to Clones, Armagh and further afield
- site could become a hub for family's, friends and couples to come and base themselves while they explore the area both near and far
- As well as a Glamping Site, as the connectivity in the area improves through the CycleConnects and Active Travel projects, and the Development Plans greater focus on providing infrastructure to strengthen and support the creation of an environment that is attractive and safe for walking and cycling, landowner would look to establish a Bike Hire business on the site, which will help establish Monaghan Town as a tourist destination by improving visitor amenities on offer, allowing tourists to park up when they arrive in Monaghan and explore the area by bike rather than by car
- Landowner would like the option left open of possibly building a small house on the site and running the Glamping business alongside it
- Site is zoned "Proposed Residential A" in Draft Monaghan County Development Plan 2025-2031
- Amend the Land Use Zoning Matrix be facilitate Development Type "Camping/Caravan Park" to allow "Proposed Residential A" land to be "Open for Consideration" rather than its current category of "Not Normally Permitted". "Open for Consideration" rather than "Acceptable in Principle" allows the Council to retain the power to approve on a case by case basis.
- Alternatively, rezone the site from "Proposed Residential A" to "Strategic Residential Reserve" and that the Land Use Zoning Matrix be altered for Development Type- "Camping / Caravan Park" to allow "Strategic Residential Reserve" land to be "Open for Consideration " rather than its current category of "Not Normally Permitted". "Open for Consideration" rather than "Acceptable in Principle" allows the Council to retain the power to approve on a case by case basis.
- Failing both these requests, rezone the site "Recreation and Amenity"

Chief Executive Response

The submission request is tri-fold, as follows:

- Retain Proposed Residential A and amend the Land Use Zoning Matrix to facilitate "Camping/Caravan Park" to be "Open for Consideration"
- Alternatively, rezone the site from 'Proposed Residential A' to 'Strategic Residential Reserve' and amend the Land Use Zoning Matrix to facilitate "Camping/Caravan Park" to be "Open for Consideration "
- Failing both these requests, rezone the site 'Recreation and Amenity'

The subject lands are located at Coolshannagh, Monaghan Town, north-east of the Town Centre with frontage onto the National Primary Road N54 and a Local Road. The lands are very close to the Ulster Canal Greenway. The lands are within the Settlement Envelope, are Tier 1 'Serviced Zoned Land' and are zoned 'Proposed Residential A' in the Draft Plan.

The landowner has stated an interest in developing a glamping business and bike hire on the subject lands because same are an ideal location for such a business with its close proximity to both Monaghan Town and the Ulster Canal Greenway.

Section 4.12 of Chapter 4 (Economic Development) of the Draft Monaghan County Development Plan 2025-2031 states that tourism is an emerging sector in County Monaghan and has enormous potential for future growth.

Tourism Objective TMO 9 of the Draft Development Plan states *'To support and encourage the development of appropriately scaled alternative forms of tourism accommodation on suitable sites within the towns subject to Chapter 15 Development Management Standards of the Monaghan County Development Plan 2025-2031'*.

Based on the subject lands' proximity to the Ulster Canal Greenway, and to facilitate the development of a glamping/caravan site on the subject lands, it is recommended that these lands be zoned for Recreation/Amenity use.

Chief Executive Recommendation

It is recommended that these lands be zoned for 'Recreation/Amenity' use.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-58</u>	Moffett Investment Holdings c/o McGuigan Architects	Kilnacloy, Monaghan	14

Summary of Submission & Issues Raised

- The submission relates to an area measuring approximately 1.75 hectares, designated as 'Proposed Residential A'. This follows on from the previous site area of 4.49 hectares which has since been developed.
- The site is of a substantially mature setting and is currently in use to facilitate the construction of the last few dwellings in the current development. The proposed site boasts the necessary infrastructure/services to be easily accessible to the site with capacity having been provided within the current development.
- The site is predominately bounded by residential developments/one-off dwellings with some commercial premises in close proximity.
- The site is steeply sloping and rises from the access road on the southern boundary to the middle of the site before falling away steeply towards the river to the north.

Planning History

The submission provides details on planning applications which have been made in relation to the surrounding lands.

- Reference No: 18/307
- Reference No: 21/157
- Reference No: 21/282
- Reference No: 21/538
- Reference No: 21/625
- Reference No: 22/328
- Reference No: 23/8
- Reference No: 24/9004

Site Assets

The submission outlines a number of site assets, their value and a proposal on how to deal with same.

- Asset: Location & Access

Value: Located within the town and boasts connection to the existing road network including public transport (bus station neighbouring the site) offering ease of access to a wide range of local and national facilities.

Proposal: To promote a residential opportunity within the urban footprint and to promote walking and cycling together the use of public transport.

- Asset: Services (Water / Electrical / Storm / Foul)

Value: Services located within close proximity leaving ease of connection.

Proposal: Retain existing and connect into same – upgrade if necessary.

- Asset: Mature Site / Vegetation

Value: Visual and wildlife habitat.

Proposal: Retain and augment existing surrounding boundary vegetation and provide additional planting.

- Asset: Changes in level and landform

Value: Utilising the natural slope of the site, creating a visual link with adjacent development.

Proposal: Use of existing levels to create a development with distinct identities.

- Asset: Views

Value: Position and orientation of buildings utilising its southerly aspect.

Proposal: Exploit within the layout to benefit new residents.

- Asset: Wide variation in local architectural styles and material.

Value: No coherent architectural identity.

Proposal: To create an attractive urban development with a distinctive identity drawn from the best traditional characteristics of the wider area, providing variety and individuality in special treatments and unit design avoiding uniformity and repetition.

Existing Development

- As a Tier 1 serviced site in a suburban location the planning rationale was to deliver a high quality residential development.
- The initial phase was to maximise the sites assets and provide a community which creates a sense of place within the site and its surrounds. Principles of sustainable urbanism design were adopted. The scheme responds to its locational context in terms of density & scale while making the most efficient use of the site.
- The merits of the sequential approach in land use planning being well established. In this regard the development of land for residential purposes is influenced by multiple factors such as services, availability, accessibility and existing infrastructure.
- The proposed site is appropriate in terms of sequential development.
- The site is sequentially the next parcel of lands available for development to the north of Monaghan Town and should be zoned 'Proposed Residential A' in advance of other parcels in the Town given services in-situ and the extent of works already carried out on the lands.
- Delivery of a scheme via an appropriate land use zoning on these lands should therefore be supported by the Planning Authority in advance of many other land parcels elsewhere in the town which are 'Proposed Residential A'.

Proposal

- The site is located within the settlement limit for Monaghan Town as shown in the Draft Monaghan County Development Plan 2025-2031, part zoned as "Residential" and the remaining deemed "Landscape Protection/ Conservation".
- The submission welcomes the inclusion of the lands within the draft development plan, however, respectfully request that the boundary of the zoned lands be altered to take account of the existing ground levels.
- To amend the boundary would provide for a most cost effective development and bring the development to a close with the remainder of the lands within this site to be left as "Landscape Protection / Conservation".

Conclusion

- The Draft Monaghan County Development Plan 2025-2031 has rezoned the existing zoning of 'Landscape Protection/Conservation' to 'Residential A'. Taking into account the characteristics of the sites, its setting, location and capacity of existing infrastructure we believe the zoned parcel of land should remain as proposed residential with the boundary adjusted to take account of the land characteristics leaving for a more efficient and cost-effective development. The remaining balance of the site should be considered as Landscape Protection/ Conservation within the Development Plan 2025-31.

- Welcome the change in zoning and respectfully request that the boundary of lands zoned 'Residential A' under the Draft Monaghan County Development Plan 2025-2031 be adjusted to take account of the land characteristics leaving for a more efficient and cost effective development.
- Request that the recommendations of this submission be given full consideration in preparation for the forthcoming Monaghan County Development Plan.
- Strongly recommended the submission lands as outline be zoned 'Residential A' as they are ideally located within the centre of Monaghan town, close to services, amenities, public transport, and residential development on this land would further support the growing population of Monaghan.

Chief Executive Response

The submission helpfully provides an overview of the lands adjacent to the subject site, which have been recently developed to provide housing within Monaghan Town. The comments raised in respect of sequential development are acknowledged, and it is considered that the proposed zoning as 'Proposed Residential A' is reflective of the Planning Authorities recognition of the subject sites ability to accommodate further residential development, in an appropriate location within Monaghan Town.

The request made within this submission, to amend the boundary of the area zoned 'Proposed Residential A', is acknowledged. It is recommended that the draft plan be amended to accommodate this

Chief Executive Recommendation

It is recommended that the development limit be amended and area of 'Proposed Residential A' be extended.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-61</u>	Jane Keenan c/o Craftstudio Architecture	Latlorcan, Monaghan Town.	15

Summary of Submission & Issues Raised

- The subject lands are located at Latlorcan, Monaghan Town, with direct access onto the Dublin Road and an adjacent local road, the L5510 and situated within 1km of Monaghan Town. The subject lands are currently zoned as Strategic Residential Reserve.
- The subject lands span a total of 4.51 hectares across two folios and submission notes that the subject lands are well suited for residential development of varying densities having regard to the site's natural topography, which slopes upward from the centre towards the Dublin Road.
- It is proposed that the northern portion of site, closer to the Dublin Road is zoned as Proposed Residential B, which would facilitate the development of serviced residential sites and low-density housing. This approach will allow for a structured and coordinated development process that aligns with both the surrounding residential character and the natural topography of the site. The proposed zoning for this area ensures that the development is compatible with the existing neighbourhood, creating a cohesive urban environment while providing much-needed residential options. As a minimum, rezoning the area of lands immediately adjacent to Dublin Road to allow for individual houses will consolidate the existing streetscape on approach to Monaghan town centre. The owner of the subject lands has been in dialogue with Cavan Monaghan ETB in relation to potentially making lands available for expansion of Beech Hill Collage facilities. As it is in keeping with the established built character of the area and do not adversely impact upon the amenity of existing residential properties, Proposed Residential B zoning would also facilitate the future expansion of these community facilities.
- The southern portion of the site, benefits from level topography and it is therefore requested that this area is rezoned as Proposed Residential A. This higher-density development would be focused on the lower portion of the subject lands, where it would be less visually obtrusive due to the natural topography, allowing the development to blend seamlessly into the existing landscape. This location and approach align the density of the new housing with nearby residential estates, supporting continuity and visual harmony within the area.
- Access to the Proposed Residential A zone on the site's lower portion would be efficiently provided from Dublin Road, passing through the Proposed Residential B lands. Additional access would also be available via the adjoining minor road, ensuring strong connectivity and ease of movement. This layout supports coordinated development that prioritizes accessibility while respecting the area's existing infrastructure and traffic flow.
- By designating this area for higher-density development, the proposal offers an effective way to meet housing demands within a well-serviced, strategically located area of Monaghan. It enables sustainable growth within the town's urban footprint, supports a balanced residential environment, and aligns with the objectives of the Monaghan County Development Plan.
- The submission notes that the subject lands are ideally positioned, being located one kilometre from Monaghan Town Centre which affords for access to key services, amenities and job opportunities as well as making it easier for residents to walk, bike or take public transport and thus reducing reliance on private vehicles.
- The submission notes that sequential zoning supports eco-friendly urban planning by reducing carbon emissions associated with long commutes and vehicle dependence. By minimizing land conversion at the urban edge, it also helps protect natural habitats, agricultural land, and green spaces.
- The submission notes that the subject lands include flood-prone areas that can be preserved as natural meadows, serving as both a flood management solution and a green amenity. This

approach supports biodiversity by maintaining habitats, while also offering residents access to green spaces that enhance quality of life.

- It is proposed that the subject lands represent one of the few remaining large tracts within the established urban settlement pattern and, as undeveloped land, they visually disrupt the continuous development along Dublin Road. This gap in the urban fabric creates a noticeable interruption in the streetscape, potentially affecting both the aesthetic cohesion of the area and the flow of activity along this important corridor. It is contended that strategically developing these lands would not only fill this visual and functional gap, enhancing the overall appearance and continuity of the Dublin Road area, but would also align with the principles of sequential development. Such an approach supports compact urban growth, better utilization of nearby infrastructure, and improved connectivity within the community.
- The submission notes that prioritising development in areas adjacent to existing urban centres, whilst utilising existing infrastructure, such as roads, utilities, and public transit systems aligns with National Policy Objective 72a of the National Planning Framework (NPF).
- It is noted that the subject lands are identified as a Tier 1 site thus representing a prime opportunity to develop a sustainable urban neighbourhood with minimal need for additional infrastructure investments. This approach not only promotes compact, contiguous growth but also supports the creation of a well-integrated, eco-friendly community that capitalises on Monaghan's existing urban infrastructure.
- It is contended that the development of the subject lands would align with the National Planning Framework and specifically Objective 3a which sets a goal to "deliver at least 40% of all homes nationally within the built-up footprint of existing urban settlements." This target reflects a commitment to sustainable growth that prioritises compact, efficient land use while reducing urban sprawl. Developing within established areas not only enhances urban vitality but also conserves resources and strengthens community cohesion. In the context of the subject lands, which align with this framework, development here would support national goals for urban density and sustainability, making effective use of an already serviced, well-located site within the urban fabric.
- The draft Monaghan County Development Plan (CDP) 2025-2031 outlines a projected population increase of 1,303 residents in Monaghan town over the plan's duration. Given that Strategic Residential Reserve zoned land is not available for immediate development, the draft plan relies heavily on Proposed Residential A and Proposed Residential B zones, located at the town's edge, to meet the growing demand for housing.
- The draft CDP acknowledges the importance of infill/brownfield/regeneration lands within the built envelope of existing settlements and proposes that up to 20% of the population growth could be provided for through development of these sites. However, the proposed zoning of Proposed Residential A and Proposed Residential B on Map MTDP1 currently contradicts this proposal with most developable land on greenfield, town edge sites. Submission notes that the reliance on edge-of-town developments could present challenges in terms of promoting compact growth, efficient infrastructure use, and accessibility to central amenities.
- The submission notes that encouraging development closer to the town centre, especially through infill and serviced sites such as the subject lands, would help balance this growth more sustainably. By focusing on lands that are already well-serviced and ready for immediate development, Monaghan can accommodate its growing population within a compact urban footprint, reducing the need for further expansion into outlying areas.

Consideration

The submission requests the rezoning of the subject lands from 'Strategic Residential Reserve' to a mixture of 'Proposed Residential A' and 'Proposed Residential B'.

The submission relates to an area of land identified as reference MT41 on the Infrastructure Assessment and are deemed Tier 1 'Serviced Zoned Land' in Appendix 16 of the Monaghan County Development Plan 2025-2031.

The Core Strategy of the County Development Plan recognises the role of settlements in driving the development of the County and identifies the scope of development possible for the County, while remaining consistent with National and Regional policy. It also identifies the quantum and location of development for the plan period, consistent with the population targets and settlement hierarchy that reflects the availability of existing services, planned investment, sequential development and environmental requirements. Whilst it is acknowledged that the lands have services available to them, there are sufficient lands located within the existing settlement footprint of Monaghan Town which are suitable for residential development to meet the projected population increase over the plan period.

Lands zoned as Strategic Residential Reserve within the five main towns of the County have been done so to facilitate the longer-term growth needs of the County. A significant number of landbanks of Strategic Residential Reserve have been removed from the settlement envelope of Monaghan Town as a result of the recommendation of The Office of the Planning Regulator due to their peripheral location. It is considered that as a result of the strategic location of the subject lands, within the built-up area, the retention of the Strategic Residential Reserve zoning will support long term compact growth and will afford for potential development beyond this plan period. It is important therefore that these lands are protected for the long term expansion of the Key Town of Monaghan.

On this basis, the subject lands are most appropriately zoned 'Strategic Residential Reserve'.

Chief Executive Recommendation

No amendment recommended.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-63</u>	Pat Mohan	Mullaghduin, Clones Road, Monaghan Town.	16

Summary of Submission & Issues Raised

- Submission relates to a Light Industrial Unit located on lands at Mullaghduin, Clones Road, Monaghan Town.
- A map of the subject lands accompanies the submission, with the relevant area highlighted in red, indicating the industrial unit and associated entrance and yard area, located to the rear of a residential unit.
- Building was constructed circa 1970 and has been used for Processing, Packaging & Labelling of Goods continuously without interruption until recently.
- Reference is made to a definition of a 'light industrial building' in Class 4 of the Planning and Development Regulations 2001 (S.I. No. 600 of 2001) which is what the previous and current use on the site can be classed as.
- Monaghan County Council Commercial Rates Bill notes the building as 'Type 79' which relates to an 'Industrial Use Workshop'.
- This submission requests an amendment to the Draft Monaghan County Development Plan 2025 – 2031 with the industrial unit shown as commercial/industrial use, with the dwelling house remaining as residential.

Chief Executive Response

The subject lands are located at Mullaghduin on the Clones Road in Monaghan Town and comprise of a light industrial unit, located to the rear of a residential dwelling. It is acknowledged that the unit is in use as an industrial building and is accessed via a separate entrance to the dwelling house. It is therefore recommended that the subject lands be rezoned from Existing Residential to Existing Commercial, to reflect the current use of the site.

Chief Executive Recommendation

It is recommended that the subject lands be rezoned from 'Existing Residential' to 'Existing Commercial'.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-65</u>	Peter Coyle, Des McKenna and Dick Clerkin c/o Ger Fahy Planning	Killygowan, Ballybay Road, Monaghan Town	17

Summary of Submission & Issues Raised

- The subject lands measuring 6.4 hectares are currently zoned Strategic Residential Reserve (western portion) and Landscape Protection / Conservation (eastern portion)
- The submission requests the rezoning of the lands from Strategic Residential Reserve and Landscape Protection / Conservation to Proposed Residential A.
- The lands can be accessed from the N54 Clones Road via a recently purchased dwelling and are fully serviced by water, sewerage and electricity
- The lands are bounded to the south by residential development and are in close proximity to the leisure centre, the hospital, two primary schools and the town centre.
- The submission sets out an analysis of the draft development plan, particularly the Core Strategy, highlighting the focus on directing population growth towards urban areas, targets for growth of Monaghan Town, promotion of Town Centre First principles, and compact urban form through development of lands within the urban footprint.
- The zoning of the subject lands would accord with the above objectives.
- The draft development plan indicates that Monaghan Town will increase its population by 1,519 persons by 2031 and will require approximately 477 houses to accommodate this population based on average household size.
- The submission highlights objectives relating to Monaghan Town's position as the principle town in the County.
- The current zoning for Monaghan Town does not follow a pattern of orderly development with lands which are further away from the Town Centre currently zoned Proposed Residential A whereas the subject lands are zoned Strategic Residential Reserve.
- There are a number of inhibitors to the development of some of the lands zoned Proposed Residential which would prevent the immediate delivery of residential development, whereas the subject lands are readily available for development.
- Monaghan as a key town within the RSES is identified for population growth of 30% or more above Census 2016 levels to achieve a population of at least 10,000 by 2040 and to ensure this target is met Monaghan Town must achieve a population increase from 7,894 (2022) to 9,200 by the end of this development plan period.
- Whilst sufficient lands have been zoned to facilitate the provision of social and affordable houses, insufficient or unsuitable lands have been zoned to facilitate the development of households by private developers within the lifetime of the Plan.
- Some of the private lands zoned Proposed Residential A have a number of restrictions which would inhibit their development in the lifetime of the Plan, such as not having road access and being very steep sloped lands, while some lands have been zoned for decades without any development taking place.
- A reassessment of the Infrastructural Assessment and Settlement Capacity Audit in Appendix 16 of the Draft Plan is required in order to re-examine the whether the zoned lands in Monaghan Town are capable of achieving the required population growth to be delivered by the private sector.

- Some of the lands zoned Proposed Residential would not be capable of being developed within the lifetime of the plan and should therefore be rezoned Strategic Residential Reserve until such a time as they are not landlocked and are capable of being developed.
- Lands which have been zoned residential and not capable of being developed within the lifetime of the plan should therefore be rezoned Strategic Reserve until such time as they are capable of being developed.
- A plot of land to the north of the town is landlocked and two plots of land zoned Residential A to the south of the town are also landlocked and are further from the town centre than the subject lands. Three sites zoned Proposed Residential A yet currently landlocked reduces the development potential of same within the lifetime of the Plan.
- One of the sites currently zoned Residential B to the south of the town is a very steep sloping site which would make it difficult to develop in any meaningful way.
- A number of the sites currently zoned for many years (some since 2007) have not been developed and there are no guarantees the land will be developed.
- Section 4.4.1 of the Development Plan Guidelines for Planning Authorities (2022) states that it is best practice where land is zoned and has remained undeveloped through one or more development plan cycles, that alternative approaches be considered such as alternative zoning or de-zoning.
- Many of the lands zoned Proposed Residential B are further away from the Town Centre than the subject lands which have been zoned Strategic Residential Reserve.
- Part of the subject lands have been zoned Landscape Protection/Conservation in the Draft Development Plan due to flood risk.
- A Flood Risk Assessment (FRA) of the subject lands based on the Catchment Flood Risk Assessment and Management (CFRAM) data (the primary reference for flood risk planning in Ireland) has been carried out by RPS in accordance with The Planning System and Flood Risk Management Guidelines.
- The CFRAM involved the watercourses in the area being modelled, and flood maps produced which can be used to establish the existing flood risk at a site.
- According to the CFRAM maps there are limited areas of Flood Zone A and B within the site.
- The FRA argues that the majority of the subject lands are not located in Flood Zone A and are not prone to flooding and would not give rise to flooding of adjoining lands, in contrast to the larger area zoned Landscape Protection / Conservation in the Draft Development Plan.
- The assessment highlights that the 2024 Strategic Flood Risk Assessment (SFRA) states that the source of information for the area is the SFRA (dated September 2018) which was prepared as part of the Monaghan County Development Plan 2019-2025.
- The extent of the flood risk zoned land significantly differs from the CFRAM mapping, and the logic behind zoning a greater area for Landscape Protection than required for Flood Zone A is unclear.
- Based on the submitted site-specific Flood Risk Assessment by RPS there is justification for reducing this Landscape Protection Area to correlate with the area shown in the Flood Risk Assessment in line with the Government Guidelines on Flood Risk Management.
- As the site will be used for residential development which is classified as 'highly vulnerable' in the Flood Risk Guidelines this type of development is not suitable in either Flood Zone A or B, and therefore these areas should be avoided for built development, which should only take place in Flood Zone C.
- Flood Zones A and B within the site can be used for amenity open space provided the levels are not altered and it can still be allowed to safely flood if required.

- The Planning System and Flood Risk Management Guidelines state that a precautionary approach should be taken to climate change and as the flood extent may result from an increase in rainfall, a cautious approach to zoning land should be adopted in these potential transitional areas.
- Therefore, RPS recommends that the Office of Public Works (OPW) Mid Range Forecast Scenario (MRFS) flood extents are used to set any future development extent with the proposed levels of any future development set including an allowance for climate change and a suitable freeboard allowance.
- The subject lands should be zoned Proposed Residential A having regard to proximity town centre, nearby schools, amenities and community facilities.
- The lands are accessible as the landowners own four dwellings adjoining the subject lands and the lands are fully serviceable with water, sewerage and electricity.
- The zoning of the subject lands would constitute orderly development.
- The flood risk assessment confirms there is no potential for flooding on the majority of the site as it is located outside Flood Zones A and B.
- Only a small portion of the site is in Flood Zone A and as per the Guidelines this can be used as Open Space/Amenity Space as part of a residential development.
- The lands can be developed within the lifetime of the Development Plan.
- Proper planning and development policies prioritise orderly development with a town centre first approach being a strategic objective of Government policy and these lands are strategically located adjacent to the town centre and should therefore be prioritised for the delivery of residential development within the lifetime of the Plan.
- The lands are closer to the town centre than other more remote lands which have been zoned residential.
- A broad Social and Community Audit on the proximity of the site to social and community uses indicates that the leisure centre and primary schools are within 300 metres of the subject lands and the town centre is 340 metres from the lands, with the hospital 750 metres away. There are a number of bus stops in close proximity to the lands also.
- The subject lands were historically zoned Strategic Residential Reserve as they were landlocked but are now fully accessible for development as the dwelling to the front is now owned with the lands.

Chief Executive Response

The subject lands comprise of 6.4 hectares of agricultural fields to the rear of a line of dwellings along the Clones Road, Monaghan Town. The subject lands are within the built up area of the settlement, are Tier 1 'Serviceable Zoned Land' and are zoned 'Strategic Residential Reserve (western portion) and Landscape Protection / Conservation (eastern portion) on the basis that the lands are at risk of flooding in the Draft Plan.

The submission is twofold in that it requests a rezoning of the lands from Strategic Residential Reserve (approximately 4.5 hectares) to Proposed Residential A and a rezoning of part of the lands zoned Landscape Protection / Conservation which are not subject to flood risk to Proposed Residential A.

Given that the subject lands lie well within the built up area of the town, in close proximity to the town centre, local schools, leisure centre and other public facilities and services, it is considered that these lands should be zoned for residential use during the lifetime of the development plan, specifically Proposed Residential A given their central location. As the previous issues regarding access to the lands would appear to have been resolved by the purchase by the lands owners of a dwelling within the line

of dwellings along the Clones Road, and by the fact the three landowners also own three other dwellings within this line of dwellings, it is considered that the lands are now accessible and there is no impediment to their development in this regard. Although the dwelling through which access is being proposed is bounded to the rear by lands zoned Landscape Protection / Conservation, the zoning objective for this zoning does allow for the provision of services within these zoned areas to serve adjoining zoned lands.

In respect of the flood risk issue affecting the eastern portion of the lands, the submission and accompanying flood risk assessment has demonstrated that the area covered by the Landscape Protection / Conservation is more extensive than the area covered by the Catchment Flood Risk Assessment and Management (CFRAM) extent of potential flood risk. Given that CFRAM data is the primary reference for flood risk planning in Ireland it is considered that the Landscape Protection / Conservation zoning should be scaled back to cover only the CFRAM extent area.

To facilitate the rezoning of these lands and in order to comply with the Core Strategy and adhere to the quantum of zoning set out in the revised Core Strategy Table 2.5, approximately 5 hectares of Proposed Residential A or Proposed Residential B will have to be either dezoned, or rezoned as Strategic Residential Reserve or for another land use. In this regard a table is appended to this report setting out the proposed changes to zonings within each of the five towns where equivalent lands proposed be zoned Proposed Residential A or Proposed Residential B are either dezoned or rezoned to facilitate the rezoning of the subject lands to Proposed Residential A.

Chief Executive Recommendation

it is recommended that the subject lands are rezoned from Strategic Residential Reserve to Proposed Residential A, and that those lands which are zoned Landscape Protection / Conservation, which lie outside the Catchment Flood Risk Assessment and Management flood risk extents, be zoned Proposed Residential A. It is further recommended that the proposed changes to zonings included within the relevant table in Part 4 of this report detailing the equivalent lands proposed be zoned Proposed Residential A or Proposed Residential B in the draft plan to be either dezoned or rezoned to facilitate the rezoning of the subject lands to Proposed Residential A, be proceeded with.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-67</u>	Richard Shirley	Rooskey, Monaghan Town.	N/A

Summary of Submission & Issues Raised

- This submission relates to a private residential property and gardens at Rooskey, Monaghan Town.
- Subject site is bound on the northern side of my property being approx.150 meters in length.
- Landowner has been living in the house for 30 years. During that time one large flood was experienced, approx. 10/15 years ago, where the river overflowed some 10/15 feet in to the garden.
- The submission states that subsequent to the major flood the County Council dredged the river on two occasions from Old Cross Square to the roundabout at Maurice Graham’s, thereby lessening the risk of flooding.
- It is stated that the subject site slopes down to the river and the flood did not extend close enough to the house to cause concern. Reference is made to a good photographic view which can be seen on Google Maps.
- The submission notes the extent of the green line in proximity to the house on Monaghan Town (Map MTDP1) and requests a reduction in the line back towards the river.
- This submission raises concerns that this may affect home insurance in the future if an insurance company considered the house to be a risk based on the proposed plan.

Chief Executive Response

The lands are currently zoned ‘Existing Residential’ in the Draft Monaghan County Development Plan 2025 – 2031. The subject lands contain a dwelling house and associated gardens.

The flood extents on the subject lands are based on detailed modelling by the OPW, published under the Catchment Flood Risk Assessment and Management (CFRAM) Programme in 2016. The Flood Maps have been developed to comply with the requirements of the European Communities (Assessment and Management of Flood Risks) Regulations 2010 to 2015 for the purposes of establishing a framework for the assessment and management of flood risks, aiming at the reduction of adverse consequences for human health, the environment, cultural heritage and economic activity associated with floods.

CFRAM data is not prepared by Monaghan County Council and therefore the Council has no authority to amend mapping contained within it.

The Strategic Flood Risk Assessment has been reviewed/ revised as per OPR recommendation; this data is reflected in the amended maps set out in the revised SFRA and the green ‘Flood Risk Areas’ have been removed from the draft zoning maps 2025-2031.

The CFRAM study has identified that the lower part of the site, which falls easterly towards the river, falls within Flood Zone A and Flood Zone B. The extent of the flood risk identified and more information can be found in Appendix 19 Strategic Flood Risk Assessment, prepared in conjunction with the Draft Monaghan County Development Plan 2025 – 2031.

Issues relating to insurance fall outside the remit of the planning process and cannot be considered as part of the development plan review.

Chief Executive Recommendations

The flood zone maps have been reviewed and amended in the revised Strategic Flood Risk Assessment and the green 'Flood Risk Areas' have been removed from the draft zoning maps 2025-2031.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-70</u>	Eamonn Hackett	Dublin Road, Monaghan Town.	N/A

Summary of Submission & Issues Raised

- Submission is from Smarttanks Ltd, a small business operating from the Rossmore Factory, Dublin Rd, Monaghan Town.
- Author notes the proposal in the Draft County Development Plan to zone the Rossmore Factory as a Flood Risk.
- It is submitted that Smarttanks Ltd have been operating at these premises for many years and that there has never been a single incident of flooding on the site.
- The submission raises concerns at the effect the Flood Risk Area has on his business, his ability to get insurance and any plans for future improvements or expansions.
- The submission also raises concerns about the lack of direct communication with affected business owners prior to making this proposal public, as well as the insufficiently detailed rationale available for review on the Council's website.
- The submission refers to the SFRA Appendix in the Draft Monaghan County Development Plan 2019 – 2031, specifically to MTFRA48 which is vague and does not correspond with the site.
- It is submitted that a thorough, site-specific assessment was conducted and there is a lack of due diligence, especially given the serious implications of this zoning change. There is also a limited time available to make a comprehensive submission.
- Submission requests the withdrawal of the Flood Risk Area from the Rossmore Factory site and retain the zoning as currently exists in the Monaghan County Development Plan 2019 – 2025.

Chief Executive Response

The lands are currently zoned 'Industry/Enterprise/Employment in the Draft Monaghan County Development Plan 2025 – 2031. This zoning remains unchanged from the previous plan, Monaghan County Development Plan 2019 – 2025.

The flood extents on the subject lands are based on detailed modelling by the OPW, published under the Catchment Flood Risk Assessment and Management (CFRAM) Programme in 2016. The Flood Maps have been developed to comply with the requirements of the European Communities (Assessment and Management of Flood Risks) Regulations 2010 to 2015 for the purposes of establishing a framework for the assessment and management of flood risks, aiming at the reduction of adverse consequences for human health, the environment, cultural heritage and economic activity associated with floods. The CFRAM study has identified that part of the subject lands fall within Flood Zone A and Flood Zone B. The extent of the flood risk identified, and more information can be found in Appendix 19 Strategic Flood Risk Assessment, prepared in conjunction with the Draft Monaghan County Development Plan 2025 – 2031.

CFRAM data is not prepared by Monaghan County Council and therefore the Council has no authority to amend mapping contained within it.

The Strategic Flood Risk Assessment has been reviewed/revised as per OPR recommendation; this data is reflected in the amended maps set out in the revised SFRA and the green 'Flood Risk Areas' have been removed from the draft zoning maps 2025-2031.

The development plan process includes several periods of public consultation throughout the two year review including a 10 week consultation period following the publication of the draft county

development plan. The consultation period for the Draft Monaghan County Development Plan 2025 – 2031 ran from 5th September until 14th November 2024. There was a widespread advertisement campaign for the consultation period, in both the local print and audio media as well as regular posts on the local authority’s social media channels.

Issues relating to insurance fall outside the remit of the planning process and cannot be considered as part of the development plan review.

Chief Executive Recommendations

The flood zone maps have been reviewed and amended in the revised Strategic Flood Risk Assessment and the green ‘Flood Risk Areas’ have been removed from the draft zoning maps 2025-2031.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-73</u>	Cannon Kirk Ltd. c/o MJC Planning	Lands at Gortakeegan, Monaghan	18

Summary of Submission & Issues Raised

The submission requests the rezoning of lands from 'Industry, Enterprise and Employment to 'Proposed Residential B'.

Introduction

- Cannon Kirk is exclusively a house building enterprise that has been constructing family homes since its formation in 1981
- Cannon Kirk purchased its c.9.64ha holding in Gortakeegan – of which the subject site of c.3.34ha is a part – with the sole intention to construct houses thereon.
- The submitted location maps identify the subject site as outlined with a blue boundary line (Map 1), with a red coloured area showing the subject site within the overall landholding (Map 2).
- It can be noted from these that the subject site of 3.34ha is located in the south-western segment of Monaghan Town close to the Newbliss Road/Clones Road junction. It is bounded to the north by the Monaghan Town FC playing pitches, to the south by a series of one-off detached dwellings, the balance of the owner's landholding to the east, and the Newbliss Road to the west.
- The subject site (along with the balance of the landholding) was zoned for residential purposes in the 2007-2013 Monaghan County Development Plan (Ref: Monaghan Town Map MDP 1). It was then rezoned to Industry/Enterprise/Employment in the subsequent 2013-2019 County Plan, with such new zoning simply repeated in its replacement thereafter, namely the current 2019-2025 document. The Draft County Plan now seeks to continue with this non-residential zoning to 2031
- Envisaging its continuation as a site suitable for buildings - and their associated and ancillary works and services - to be placed thereon, the only issue to be addressed now as part of this Draft Plan process, is its appropriate land use.
- This Submission will outline that the proper planning and sustainable development of the County in general and of the Town especially, will be better served by zoning the subject site 'Proposed Residential B' rather than 'Industry/Enterprise/Employment'.

The Setting

- Given that this Industry/Enterprise/Employment zoning has therefore been in place for almost 12 years, with the intention at this stage to increase it to 18 years, the opportunity to assess if this continuation is appropriate needs to be taken, given that the subject site has never received a planning application for any IEE purpose, and that no offers or interest was forthcoming when it was previously placed on the market for sale
- The Draft Plan has outlined that the extent of the lands zoned for IEE purposes in the (current) County Development Plan 2019-2025 in the five main settlements of the County - which includes Monaghan Town - amounts to 547ha. Of this total over 70% (384ha) is undeveloped i.e. not in use or without the benefit of an extant permission.
- Specifically, within the Monaghan Town development boundary the current 2009-2025 County Plan has zoned 233ha for IEE uses, which equates to 43% of all the lands designated for such purposes in the County. Of this 233ha Town total, 71% (166ha) is undeveloped, as not more than 63ha is in use and only 4ha has an extant permission (Ref: Table 3, Section 1.0, Appendix 17: Review of Industry, Enterprise and Employment)

- Of the 166ha of undeveloped IEE lands in the Town, c.99ha has been determined as lying in close proximity to established businesses and as such this area is proposed to be reserved to allow for their possible expansion. The major established businesses identified include Combilift, IJM and Lakeland Dairies at the north-eastern extent of the Town, and Kingspan Century Homes to the south-west.
- Additionally, it is mentioned in the Draft Plan that some of these IEE lands are adjacent to residential and those other land uses that may be detrimentally impacted by such IEE operations. As such some of this c.99ha is also to be retained to provide a buffer between conflicting land uses.

The Rationale for the Omission of the Proposed IEE Zoning

Introduction

- Given that the IEE area that is occupied at present is 63ha, the proposed reserved area of c.99ha equates to a 150% increase in the total hectares given over in the Town to such uses. Notwithstanding, in addition the 67ha remaining (after the c.99ha is deducted from the 166ha of undeveloped land), is more than the 63ha total occupied at present by all the existing IEE businesses in the Town.
- In essence therefore, the Draft Plan is seeking to make provision for a multiple of 2½ times the existing in-use IEE lands.
- It is unlikely that this degree of expansion will be required over the next 6 years, especially given that only 4ha has the benefit of an extant permission at this time.
- (In context the proposed IEE zoning of the subject site would constitute only 0.6% of the County IEE total and less than 1.4% of the Town's 233ha total).

The Contours

- The subject site is at best 3.34ha in area. With reference to the attached contour plan drawings, it can be noted that some 1.96ha have a pronounced slope with the ground rising slowly in from the public road – from the 59m contour at the roadside to the 62m – and then increasing thereafter from the 62m to the 82m contour. It can be noted that retaining walls would have to be erected at the 62m contour to allow adequate space for an IEE building and its associated services.
- So given the limitations imposed on any possible IEE building due to retaining walls being required and the additional costs, the reasonable IEE development area of this site is effectively 1.38ha. This reduced area of the subject site would equate to only 2% of the 67ha in the Town (after the c.99ha is reserved) proposed for new IEE establishments.
- (This reduction would not be a factor in the provision of dwellings, given the innovation that can be employed on the design of both structures and sites and the higher value use that residential has over industrial floorspace. To this end it should be noted that Cannon Kirk have always employed a consultant architect to prepare its housing schemes).

The Immediate Location

- The subject site with the Newbliss Road defining its western edge, is bounded to the north by the amenity/activity space that is the Monaghan United FC playing pitches, and by a collection of one-off dwellings and the Killyconigan residential estate to the south and east respectively. A creche functions from a building directly opposite the subject site.
- With no IEE building on site, no retention of any part of this vacant subject land is required to create a buffer with the surrounding non-IEE entities. So that policy aspect is not relevant in this instance. Indeed, the use of this site for IEE development would likely create the problem the Council is seeking to avoid, notwithstanding the opposition that might be generated from the adjoining property owners.

- Also, with no IEE onsite building, none of subject site needs to be retained for its possible expansion.

Acceptable in Principle and Open for Consideration Land Uses

- Those uses listed in Table 9.3: Land Use Zoning Matrix include many that would likely generate opposition from First and Third Parties due to probable issues concerning noise, dust, traffic movements and visual impacts (e.g. boarding kennels, breakers yard, transport depot, heavy industry, waste transfer site).
- Other stated uses are already provided adjacent or elsewhere (e.g. creche, schools, service station, Fire Station), or would not function effectively due to the lack of sufficient space (e.g. warehousing) or would not be in that part of the Town where synergy would operate (e.g. other technology enterprises in the north-east part of the Town).
- As such the potential of this site for IEE purposes would be substantially reduced.

The Proposed IEE Lands

- The Draft Plan has appraised 19 separate pieces of land which it seeks to have zoned for IEE uses (Ref: Appendix 16: Infrastructural Assessment and Settlement Capacity Audit).
- Of the four with the largest areas, those two at the north-eastern segment of the Town, the 77.7ha in the Tullyhirm/Knockaconny/Drumrutagh/Annahagh Townlands (MN IEE 1) accommodate Combilift, and the 12ha Knockaconny Business and Technology Park which contains M:TeK I and II, an Advanced Technology Unit and the Bioconnect Research and Innovation Centre. The other is the 25ha of MN IEE 2 (Annahagh Townland), which has IJM at its southern extent.
- The remainder of this 102h total – generally consisting of level or slightly sloping ground - lies in the main undeveloped, and therefore can easily accommodate the expansion if required of the existing business thereon, provide for new arrivals, while at the same time allowing, if necessary, for the creation of buffer zones.
- At the south-western extent of the Town (where the subject site is located) the other two major IEE landbanks are to be found. These are the 22ha of MN IEE 6 of the Dunsinare Townland, which is free of development or any extant permission at this time. The other is the 31.7ha of MN IEE 10 in the Townland of Cornacessa Demense, which is also free of development (save for 0.69ha. given over to a dry goods storage building - MCC Reg No 22349/ABP 317805-23) - or any extant permission.
- Furthermore over 50% of the 8.2 ha. of the MN IEE 9 (Tullygrimes Townland) where Kingspan Century Homes is located is also vacant, an area that would allow expansion westwards, if required, to open agricultural lands with no part therefore necessary to be reserved for buffer purposes.
- The omission of the subject site's 3.34ha. from the Gortakeegan Townland MN IEE 8 area of 8.28ha will not create any impediment to the use of the balance of c.5ha, as this is on the opposite side of the Newbliss Road, with almost 70% of this remainder undeveloped and without an extant permission.
- Nor will it affect the MN IEE 7 (Killyconigan Townland) area of 4.4 ha as this land is to the north of the subject site to which it is not attached, with an undeveloped portion and a two-storey substantial floorspace building which is vacant at present.

Access/Road Relationship

- In the Draft Plan's Section 10.9, Chapter 10: Monaghan Town Settlement Plan, a set of new road and upgrade proposals are listed. These include an extension to the Oriel Way Southern Link Road, and a Northern Link Road connecting the N54 Clones Road to the N2 (Dublin-Derry) and the N12 (Monaghan-Armagh) National Primary Routes.

- The extension of the Oriel Way will travel in part along the northern extent of the Dunsinane IEE zoned area (MN IEE 6), while the Northern Link Road will travel in part along the western and northern sections of the perimeter of Cornacessa Demense (MN IEE 10).
- The subject site has no role to play in the provision of these proposed link roads. And given that such are likely to be developer led, the Council will undoubtedly prioritise the development of these IEE landbanks over all other land in the vicinity. The change of the proposed IEE zoning of the subject site to Proposed Residential B would not interfere with the advancement of these road proposals.
- In Section 10.7 of the County Plan, mention is made of the notable enterprises in the Town, which are principally located at its north-eastern extent. The opening of the Monaghan Town Bypass section of the N2 Dublin/Derry route in 2007 (with its serving Annahagh and Coolshannagh Roundabouts that allow direct access to the 102ha of the MN IEE 1 and 2 landbanks), provides linkages to Derry and Letterkenny by way of the A5 (the improvement to which is about to commence); to the M1/ Dublin by use of the N33 Link at Ardee; and to the Dublin/Belfast Economic Corridor and to Armagh and Belfast by availing of the N12, has attracted major employers to locate within this area.
- This north-eastern extent of the Town – where the 102h of the MN IEE 1 and 2 landbanks are located - will undoubtedly continue to be the primary focus for IEE development well into the future.
- The subject site does not have these road advantages, which provide easy access to the main markets on the island and beyond. Limited in usable area and steep in contour, it will generally be unattractive to prospective IEE purchasers, especially if in the main the Town Centre would need to be negotiated by its commercial traffic.

Establishing a Jobs Growth Target

- In Appendix 17 (Review of Industry, Enterprise and Employment Lands) of the Draft Plan, a direction of travel to arrive at a jobs growth target for the County to 2031 has been outlined.
- Two main methods have been used. The first, a job target based on population growth applying labour force participation and job ratios, projected an additional jobs target of 1,900. The second, a localised target derived from regional jobs targets set out in the Northern and Western Regional Assembly's Regional Spatial and Economic Strategy 2020. This methodology suggests a growth target of 2,345 additional jobs by 2031.
- Leading on therefrom the Draft Plan then sets out in Table 10, Section 3.0 of Appendix 17, the area of proposed IEE lands in each of the five settlements. Monaghan Town was given 236ha i.e. an additional 3ha over the quantity in the current County Plan. It is stated that *'the total number of potential jobs which these lands could accommodate exceeds 2,345'* though the preference is to accept that additional jobs target rather than the 1,900 one.
- With reference to Table 7: Jobs: Resident Workers-Settlement Level of the Appendix, it is noted that the total jobs in Monaghan Town is stated as 4,198 which is 50.5% of the total jobs of 8,310 in the four main settlements of the County.
- In Table 10: Proposed Industry, Enterprise and Employment Zoning, the proposed IEE 236ha zoning for Monaghan Town as part of the total IEE allocation of 480ha to the five main settlements, equates to 49.1%.
- Applying the c.50 percentage then to the proposed additional target figure of 2,345 jobs by 2031, an allocation of 1,184 jobs for Monaghan Town for the Plan period can reasonably be suggested.
- There is no indication in the Draft Plan documents as to the ratio of jobs to site area requirements for various land uses. If the example of Combilift (650 employees) on its 14.07ha site is used then this equates to an average of 46 jobs per hectare (0.022ha per job); if the existing 127ha of zoned lands in use in the four main settlements are accommodating 8,310

jobs then this gives an average of 65 jobs per hectare; and if the existing 4,198 jobs on 63ha of developed IEE land in the Town is used, this produces a figure of 67 jobs per hectare.

- Applying the 0.022ha per job to the Town's 1,184 additional jobs allocation, would then require the use of 26ha.
- If this 26ha is deducted from the 67ha of land remaining after the c.99 ha is reserved from the 166ha with no land use commitment for the expansion of existing business and to provide for buffer areas, and the c.3.34ha that is the subject site is rezoned 'Proposed Residential B', then 37ha (55%) will remain.
- Seeking to provide an area and locational aspect that spreads the IEE lands throughout the Town, there is 36ha of vacant land immediately adjacent to the subject site, 31ha alone at Cornacessa Demense MN IEE 10 which is at the Newbliss Road/Clones Road junction 290m from the subject site. Additionally, the Gortakeegan MN IEE 8 landbank sits directly opposite the site which has 5ha undeveloped at this time and with no extant permission related thereto. (Fig 3)
- The Draft Plan has added 3ha to the current County Plan's 233ha of zoned IEE lands. The particular landscape and topography of the subject site, its stand-alone situation, size, usable ground, and location between conflicting land uses and roads relationship, identifies it as inappropriate for IEE development.
- As such it should be released for other uses so that it may play its part in the proper planning and development of Monaghan Town, and that use should clearly be as 'Proposed Residential B'.

4.0 The Rationale for the 'Proposed Residential B' Zoning of the Subject Site

Introduction

- The National Planning Framework: Project Ireland 2040 (2018) outlined that in order to provide the required dwellings to accommodate the increase in population projected by the ESRI, between 30,000-33,450 residential units would be required annually.
- This 2018 NPF strategy was based on the population growth during the period 2011-2016 which was much lower than the current growth. Hence the Government had recently directed the ESRI to undertake an assessment of the current situation with a new National Development Plan being required.
- Just of late the Government has announced that a new target of 50,500 homes per year scaling up to 60,000 homes by 2030 (303,500 in total) and thereafter 54,000 per annum to 2040, with the revision of the National Planning Framework now proceeding to finalisation. It was indicated that these announced targets will only ever be the floor and not the ceiling, and where these can be surpassed such will be welcomed.
- Once finalised the revised National Planning Framework is to be incorporated into the Regional Spatial and Economic Strategies and thereafter in all of the City and County Development Plans that will then include updated Housing Supply Targets.
- (In this context, the CSO has recently indicated that the national population has increased by 4.46% in the two years since Census 2022; the Central Bank has suggested lately that over the next 10 years 68,000 dwellings will be required annually; while the Housing Commission's research in the first part of this year indicated that 488,400 residential units would be needed i.e. some 81,400 annually depending on population growth and household size, with an urgent need to deliver the 256,000 homes worth of pent-up demand).
- Given the lead time from planning application to house completion there would be merit in the Council being guided by the revisions to the Housing Supply Targets by its acceptance of the zoning of the subject site for 'Proposed Residential B' purposes.

The Proposed Residential Zoned Lands

- As part of the Draft Plan process 46 sites within the Town development boundary were assessed for residential purposes, and given either a Proposed Residential A, Proposed Residential B, Town Centre, or Strategic Residential Reserve designation. (Appendix 16: Infrastructural Assessment and Settlement Capacity Audit).
- The 15 Strategic Residential Reserve areas need to be left aside as the Draft Plan clearly states that the development of these will only be permitted in instances whereby 75% of the Proposed Residential A and B lands have been developed. The four Town Centre sites also, as these are already committed to non-residential development.
- That leaves a balance of 27 sites, of which 24 are without the benefit of an extent permission. Of the three remaining thereafter, MT 1 (0.1632ha) received an Outline permission 21/682 for one house in early 2022; MT 8 (2.6457ha) has a permission 19/441 for 42 units issued in June 2020; and MT 25 (0.9361ha) has the benefit of a permission 19/1 for 22 units granted in late 2022.
- (Only one of the 15 Strategic Reserve areas - MT 31- has permissions, for two one-off dwellings for family members on the family holding).
- There is no clear understanding why the development of only 3 of these A and B residentially zoned lands (3.745ha in total) has taken place. It is noted that many of the identified areas were zoned residential previously. but it is noted from the Draft Plan that *'the areas zoned for residential development have not substantially developed and the majority of residential units being developed throughout the County have been one-off dwellings'* (Ref; Section 2.9).
- The Draft Plan has outlined that the additional population to Monaghan Town of 1,303 by 2031 will need to be housed, at an average occupancy rate of 2.74 (with an extra 803 persons by 2040). These populations will likely be revised upwards when the new National Planning Framework is published, while the occupancy figure (which has fallen to 2.74 at the time of Census 2022), will likely continue to decrease.
- It is also of interest in the provision of the houses that can be provided on the subject site that the Draft Plan outlines that in the County the number of people aged 65 and over has grown by 21% over the six years to 2022 with many who may wish to move away from a single house in a rural setting into an urban one; the average weekly rent paid for a private house increased by 31% over the same period with the greatest demand for social housing in the County at present in Monaghan Town (44%) where the Council has no long term vacancy; the continued undersupply of new housing for sale coupled with growing demand is the main factor affecting the housing market; and nationally house prices were 5.8% higher in the first quarter of this year as opposed to the last quarter of 2023.
- In response to the forgoing, it should be recalled that Cannon Kirk is both the owner of the land and an experienced residential development company, that will bring forward and build, soon after the 'Proposed Residential B' zoning is obtained.
- There would then be an opportunity for the provision of Part V Social and Affordable dwellings, and for supply of houses locally to be increased at the earliest time.

The Sustainable Location of the Subject Site

- The Government's Climate Action Plan 2023 outlines policies to reduce transport emissions by adopting the Avoid-Shift-Improve approach – reducing the need for travel by shifting to walking, cycling and public transport.
- The concept is that ideally residents should have as many supporting needs as possible accessible by way of a combination of walking and cycling especially but also by public transport, that minimises travel by private car thereby reducing emissions that assists towards the achievement of National climate goals and targets.

- In this matter the residents of the dwellings that would occupy the subject site would be served by the following active travel options and the supporting services (Fig 4), which would render it one of the most sustainable locations for residential living:-

Bus Services

- A bus stop within 800m of a house in an urban area is Objective Action 13 of Smarter Travel: Sustainable Transport Future (2009).
- The MN3 (Monaghan Town – Mullan) and the 176 (Monaghan Town – Cavan) TFI Local Link bus routes serve the subject site. An MN3 bus stop is located in the Killyconigan Estate which is only a 630m walk from the subject site by use of the public footpath along the same side of the Newbliss Road and Canal Greenway that has public lighting throughout.
- The 176 service has stops on either side of the Clones Road immediately adjacent to its junction with the Newbliss Road, which is only a 290m walk from the subject site. The Clones Road has footpaths along each side and public lighting throughout.
- Thus, these bus stops are well within 800m of the subject site and are accessed by way of an easy and short walk on level ground.
- Both services operate seven days per week, with a total over 70 return journeys provided. Both stop in Dawson Street opposite the pedestrian entrances to Dunnes Stores and the Monaghan Shopping Centre, at the Old Library (adjacent to the Model School), St. Davenet's General Hospital, Monaghan Institute and the Bus Station with the new Library/Peace Campus directly opposite.
- Additionally, the MN3 has a stop at both the Coral Leisure Centre in Park Road where a number of schools are located and the Primary Care Centre in Rooskey, while the 176 calls at Macartan's College.
- The associated timetables show that once boarding, the journey to the Leisure Centre and the Park Road schools takes (in totals) only 2 minutes, 5 minutes to Dawson Street, 7 minutes to the Old Library, 10 minutes to St Davenet's Hospital, and 12 minutes to the Bus Station. The Primary Care Centre at Rooskey can be accessed 4 minutes after leaving the Bus Station.
- The Bus Station is the focal point to access the other MN1 and 2 Local Link services as well as the Bus Eireann onward routes. A private transport company operates a Dublin coach service that is available from the car park in Broad Road, which is less than two minutes from the stop in Dawson Street that is used by both the MN3 and 176 Local Link buses.

Childcare

- Two creches – one Crafty Kidz - occupies a substantial section of a stand-alone building on the Newbliss Road directly opposite the subject site.
- The other - Teach na bPaist - is in Oriel Way and can be reached either by using the Canal Greenway or the footpath along Clones Road. The MN3 bus service is also available which is less than a two minute journey from the Killyconigan bus stop and then a three minute walk along the Oriel Way thereafter.
- Both offer Full Day Care, Pre-School, and After School Services.

Schools

- St. Louis Infants School and St. Louis Girls National School in the Park Road; St. Mary Boys National School (St. Mary Hill); and St. Louis Convent Girls Secondary School (Broad Road) are all located in that same section of the Town as the subject site and a short distance therefrom. Therefore, the central streets and their related traffic do not therefore have to be negotiated.
- The Department of Education school bus service is also available from that stop in Killyconigan Estate, also used by MN3 with links to Park Road, a 2 minute travel time. Access to it from the subject site can be by way of the Canal Greenway's pedestrian and cycleway or the footpath along the Clones Road, both of which have formal hard surfaces
- Additionally, the Canal Greenway travels from Killyconigan to Glen Road where it meets the main gate to St. Louis Girls Secondary School, providing a 13 minute off-road cycle to that entrance. A shorter cycle journey of 10 minutes by way of the Canal Greenway and Park Road to its Broad Road entrance is also available.
- Alternatively, the MN3 and 176 bus services stop at Dawson Street, a 5 minute bus journey from the Killyconigan Estate or the Clones Road stops, with a one minute walk to the Broad Road school entrance thereafter.
- The MN3 and 176 buses also stop at the Model School (Old Library) and Monaghan Institute, while the 176 also serves St. Macartan's Secondary School.

Community Centre

- A Community Centre (Teach na Daoine), in located in Oriel Way. This can easily be reached by either availing of the Canal Greenway which would be a 6.7 minute cycle, the public footpath along the Clones Road or the MN3 from the Killyconigan Estate which stops 2 minutes later at the Oriel Way with a three minute walk thereafter.

Leisure and Recreation

- On the same side of the Newbliss Road as the subject site, Rossmore Forest Park which sits immediately to the south therefrom, can be reached by way of the public footpath that links the two. Some 328ha in area it possesses lakeside tracks and trails, nature walks, cycle trails, an adventure playpark, viewing points, picnic areas, cycle (and car) parking, café and restrooms.
- The Monaghan United FC football grounds, which has been zoned for Recreation and Amenity purposes since 2007, shares a common boundary with the subject site. It has one full size grass, one full size training, one full size all weather and four all-weather 5 aside pitches, all floodlight, which cater for two senior teams, 23 junior teams and four girls teams. Thus, all age groups are catered for and all who want to play have an opportunity to participate.
- A section of the Canal Greenway, the off-road pedestrian and cycle path, has its Newbliss Road entrance on the same side of this carriageway as the subject site to which it is attached by a footpath with public lighting standards, a 1.5 minute cycle or 3.5 minute walk away. This has links with Oriel Way, Park Road and the Glen Road. Three planned phases will add further to this existing 4.5km section, with that 21.6km addition westwards from the Newbliss Road to Clones due to open in 2027.
- The 11.5ha area of the St Louis Convent Campus now in control of the Council which contains green spaces, a lake and woodland planting, is within that same sector of the Town as the subject site. It can easily be reached using the Canal Greenway or by the MN3 bus especially but also the 176 service.
- The Coral Leisure Centre, Park Road/Clones Road, a fitness, lifestyle, and health enterprise, has a number of rooms/gyms where a range of classes take place, an indoor swimming pool and two outdoor all weather tennis courts. Onsite parking for 20 bikes is provided.

- This facility is open seven days per week primarily between 6.15am – 9.15pm, with slightly earlier closing on Sunday. The MN3 Local Link bus, which is available from Killyconigan, has a stop at the entrance to this building. A 2 minute bus journey is involved. Additionally, the cycle track of the Canal Greenway can be used for the majority of the journey with thereafter a short section of Park Road.

Shops

- Monaghan Retail Park, which can be accessed by way of the footpaths along the Newbliss and Clones Roads, a distance that will take a 7.5 minute walk/2.7 minute cycle. It houses a 5-screen multi-plex cinema (Omniplex), a food/household goods store (Home Affairs), and a hardware/electrical/plumbing outlet (Screwfix).

Service Station, Convenience Store and Café

- The Applegreen Service Station, which operates primarily between 7am and 11pm, is located on a section of the Clones Road immediately adjacent to its junction with Park Road. As such it can be easily accessed by those wishing to avail of its services that include a convenience shop and a 30 seat café, without the need to enter and negotiate the heavily trafficked central business area. The MN3 bus stop at the Leisure Centre, is adjacent to this convenience outlet.
- Being located on the same side of the Clones Road as the subject site, it will allow the pick-up of convenience items on the way home, while the café can be used as a social meeting place for those leaving in or waiting to collect children from those schools nearby in Park Road.

Employment

- Additionally, for those who are employed in the heart of the Town, or in the schools, or medical services (St. Davnet's Hospital, Rooskey Health Centre, GPs, dentists), or public administration, the MN3 and 176 bus services provide a range of sustainable journey options.
- There are employment opportunities provided by the retail outlets and cinema as well as the 15 business units at the rear of the Monaghan Retail Park; in the Tullygrimes (MT IEE 9) 8.2ha employment area where Kingspan Century Homes is located; in the Killyconigan (MT IEE 7) 4.4 ha area; and the Gortakeegan (MT IEE 8) 8.23ha area where a number of enterprises are already in place. (Fig 4)
- All are a short walk or cycle from the subject site, as is the Cornacessa Demense (MT IEE 10) 32ha employment landbank which alongside that at Tullygrimes, the Council recognises as strategically important. Regarding such it *'will facilitate and promote the sustainable development of these lands to consolidate, expand and complement existing significant enterprise activities at this location.'* (Ref: Section 10.7, Chapter 10, Monaghan Town Settlement Plan 2025-2031).

5.0 Conclusion

- The zoning of the subject site for IEE purposes is not necessary as the quantity of such zoned lands within the Town is more than sufficient to accommodate the expansion of existing enterprises and provide for buffer areas between these and competing land uses, while allowing for the establishment of new businesses and the additional jobs that are required to be created in conjunction with the projections for its population to 2031.
- Two relatively large IEE zoned lands and three smaller ones sit adjacent to the subject site to satisfy such needs in the south-west sector of the Town.
- The particulars of the subject site, including its formation and its locational relationship with the Town, main road routes and immediate neighbours, coupled with its limited usable space, render it unappealing to prospective developers for IEE purposes. This was clearly established when no purchaser or interest was forthcoming when it was placed on the market.

- Its continued zoning for IEE uses is thus simply wasteful of an asset of the Key Settlement that is Monaghan Town, that can and should be availed of for better use – namely residential – to which it is more sustainably suited.
- New housing units will be needed to provide for the accommodation of the additional population of (at least) 1,303 people to 2031. The zoning for ‘Proposed Residential B’ purposes of the subject site will allow soon thereafter for residential construction to commence, a situation that has not been forthcoming, with a few exceptions, from the zoned residential lands in the Town.
- The residents of the houses that will occupy the subject site will be sustainably supported by active travel facilities and other services including especially creches, schools, parks, that are within the same vicinity.
- The housing on the site will also add to the compactness of the Town given that it there are structures both immediate and beyond on all its sides, that are primarily dwellings.
- The Council is requested to zone the subject site ‘Proposed Residential B’

Chief Executive Response

The submission requests the rezoning of lands from ‘Industry, Enterprise and Employment’ to ‘Proposed Residential B’.

The subject lands are within a plot of lands c3.34Ha. within a larger landholding of 9.64Ha, located at Gortakeegan, Monaghan. The subject lands are located in the south-western section of Monaghan Town close to the Newbliss Road/Clones Road junction. It is bounded to the north by the Monaghan Town FC playing pitches, to the south by a series of one-off detached dwellings, the balance of the owner’s landholding to the east, and the Regional Road R189/Newbliss Road to the west.

The subject lands are within the settlement envelope, are Tier 2 ‘Serviceable Zoned Land’ and are zoned Industry, Enterprise, Employment.

Monaghan has a sufficient quantum of land zoned Industry, Enterprise, Employment, determined on a number of factors including the uptake of current zoned land, planning and environmental considerations, such as topography, developable area, flooding, sequential test, accessibility and jobs ratio. These key considerations influence both the quantum of lands proposed to be zoned, and the locations of same, within the County Development Plan 2025-2031. It is important to continue to support the aim in further strengthening and developing the economic and employment base of Monaghan Town, therefore, it is considered appropriate to retain the existing ‘Industry/Employment/Enterprise’ zoning on the submission lands.

Furthermore, the Core Strategy of the Development Plan recognises the role of settlements in driving the development of the County and identifies the scope of development possible for the County, while remaining consistent with National and Regional policy. It also identifies the quantum and location of development for the plan period, consistent with the population targets and settlement hierarchy that reflects the availability of existing services, planned investment, sequential development and environmental requirements.

Whilst it is acknowledged that these Tier 2 lands have some services available to them, the rezoning of the lands to Proposed Residential B would not contribute to the compact growth of the town as there are proposed residential lands in more sequentially appropriate locations to meet the projected population increase over the plan period.

Chief Executive Recommendation

No amendment recommended.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-74</u>	Margo Smyth c/o Aidan Sherlock	Latlurcan, Monaghan Town	19

Summary of Submission & Issues Raised

Point No.1

- The most significant point is that the site is located just on the outskirts of the main area of Monaghan town.
- The site is surrounded on both sides and in front by commercial properties but this site at present is zoned as 'Landscape/Protection and Conservation'.
- This does not accord with anything in the immediate location with a roadside location and would appear to have been zoned in this fashion due to the fact that the land to the rear of the subject lands was unkept with the subject lands is a maintained site with a stone yard type finish.
- It is for this reason that the planning authority rezone this land for commercial and industrial use to accord with proper planning and development in the area.

Point No.2

- In conjunction with the previous point, submission notes that the lands have a roadside location within the speed limit and town zoning. The current zoning of this land represents poor use of land in this prominent location.
- It is for this reason that the planning authority rezone this land for commercial and industrial use to accord with proper planning and development in the area.

Point No.3

- The Planning Authority should note that the subject site has an existing entrance with associated dropped kerbing.
- The site has an electrical supply and a water supply and can gravity feed to mains sewerage.
- The site contains an old house which is the subject of a current planning application, therefore unsure as to why the site has been zoned as it is currently.
- Submission includes a photograph showing the site from the roadside boundary – stating that the site lends itself to an appropriate use in keeping with the use of all lands in the surrounding area.
- It is for this reason that the submission requests the planning authority rezone this land for commercial and industrial use to accord with proper planning and development in the area.

Point No.4

- The site is well-maintained stoned piece of ground and not a piece of land that lends itself to landscaping etc within the areas surrounding the site with a commercial premises on both side of the land and a new creche on the opposite side of the road.
- From a study of Map MTDP 1 there are no other instances where an infill site has been zoned in this manner. This new development plan should right the inconsistent zoning decisions from the previous development plan considering all the above points and the condition and location of this site.

It is for this reason that the planning authority should rezone this land for commercial and industrial use to accord with proper planning and development in the area.

Chief Executive Response

The submission to the draft Monaghan County Development Plan 2025-2031 is welcomed. The submission requests a rezoning from 'Landscape Protection / Conservation', to commercial and industrial use.

The Land Use Objective, LUO 10 of the draft County Development Plan is to "Protect important landscape features within the towns from development that would detrimentally impact on the amenity of the landscape, on the *natural attenuation offered by flood plains*" and "to only permit development where it has been clearly demonstrated to the satisfaction of the Planning Authority that the development will not be contrary to the overall zoning objective of the lands, for example the provision of open space or services to adjoining land uses".

Planning History & Flood Risk

As referenced in the submission, there has been a recent planning application on part of the subject lands (Ref 24/32). Further Information was requested 18/06/2024, however it was deemed withdrawn on 07/01/2025 as the further information was not provided. The further information request identified that the Office of Public Works (OPW) Flood Risk maps indicate that the application site fell within an area that is at risk from fluvial flooding. Accordingly, the applicant was requested to submit a site-specific assessment of flood risk.

The Strategic Flood Risk Assessment (SFRA) (Appendix 19) identifies that the subject lands are within a flood risk area, partly within Flood Zone A and Flood Zone B. The SFRA at section 3.10.1 identifies that "in general, most types of development would be considered inappropriate in Flood Zone A. In Flood Zone B, highly vulnerable development would be considered inappropriate but less vulnerable development might be considered appropriate". Section 5.2 of the SFRA outlines vulnerability classification. Industry/ Enterprise/ Employment and Existing Commercial are categorised as "Less Vulnerable". The SFRA goes on to identify that such a use would be unsuitable in Flood Zone A, and "any proposal for development within Flood Zone B which involves changes in existing ground levels or provisions of structures will require site specific flood risk assessment at planning application stage which demonstrates that the proposed development will not at an unacceptable risk from flooding, and will not cause, contribute to, or exacerbate flooding elsewhere".

Given the flood risk associated with the subject lands, the zoning of Landscape Protection / Conservation is considered appropriate. It would not be appropriate to zone an area at risk of flooding for Industrial or Commercial Use.

Chief Executive Recommendation

No amendment recommended.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-77</u>	TF Partnership c/o The Planning Partnership	Tullygrimes, Monaghan	N/A

Summary of Submission & Issues Raised

Owner of Industrial Enterprise Employment Lands at Tullygrimes, Monaghan. A site layout is included of proposed manufacturing and business/start up units from planning application, ref. 10/179. Notes the Draft CDP outlines future road improvements and upgrades including new junction design on N54 and N2/N54 Northern Link Road, where the subject sites adjoin.

The submission refers to the relocation of the 60 kph speed limit zone 440m west of its existing location that is of key significance for the potential development.

Request a deadline be specified for this implementation to ascertain the completion of this alteration. The movement of this speed limit sign will have a significant impact on the proposed development, that was previously refused by An Bord Pleanála by reason of traffic safety.

Supporting policy context: Draft CD P Core Strategy Objectives CSO 2-3, Economic Development objectives and policies EDSO 1, EDO 1-3, 5, 6, 9, EDP 1-3, Strategic Objectives for Settlements IEO 1-7, SSO 7-8, Transport Infrastructure objectives ATP 11, NRP 4-5, Monaghan Town Settlement Plan MTO 8, 12.

Proposed Material Amendments Request to sections 10.7 and 10.9 (Monaghan Town Settlement Plan):

Paragraph 10.7: In recognising the strategically important parcel of zoned industry, enterprise and employment lands at Tullygrimes and Cornecassa Demesne, Monaghan County Council will facilitate and promote the sustainable development of these lands to consolidate, expand and complement existing significant enterprise activities at this location. The Monaghan Land Use and Transportation Study (MLUTS) recommend the relocation of the 60 kph speed limit westwards on the N54. To facilitate this the following is required:

- the relocation of the 60 kph speed limit zone on the N54, some 440m west westwards of its existing location, during the lifetime of this plan, and
- to prepare a new junction design on the N54 to facilitate the new Monaghan Town Northern link road, connecting the N54 Clones Road to N2/N12 National Primary Routes, during the lifetime of this plan.

Paragraph 10.9: Include additional text to a paragraph under section 10.9 as follows:

New road and upgrade proposals for Monaghan Town are as follows and will be executed during the lifetime of this plan:

- Monaghan Town Northern link road, connecting the N54 Clones Road to N2/N12 National Primary Routes.

Paragraph 10.9: Include the following as additional Monaghan Roads and Traffic Management Objectives:

MTO xx: The prepare the new junction design on the N54 to facilitate the new Monaghan Town Northern link road, connecting the N54 Clones Road to N2/N12 National Primary Routes, during the lifetime of this plan.

MTO xx: To relocate the 60 kph speed limit zone on the N54, some 440m west westwards of its existing location, during the lifetime of this plan.

Chief Executive Response

The Planning Authority acknowledges the importance of industrial, enterprise and employment zoned lands for the growth and development of the county. The MLUTS identifies this parcel of land within Key Recommendation 2 of the study:

Develop lands at Tullygrimes and Cornecassa Demesne: to facilitate and promote the sustainable development of a strategically important parcel of Industry, Enterprise and Employment lands at Tullygrimes and Cornecassa Demesne in order to consolidate, expand and complement existing significant enterprise activities at this location. To discuss the LUTS review of the previous (2014) access proposals with TII and agree the most reasonable and viable access proposal for the future of these lands.

In addressing the requests that are related to the provision of traffic infrastructure and junction designs within the lifetime of the CDP, the planning, design and execution of road projects is subject to funding, resources and approvals, and it is not appropriate to specify a timeframe for delivery of this project at this stage. It also may not be appropriate to design and implement a junction design without having a full design and approvals in place for the overall road, as this could be interpreted as project splitting.

Relocating speed limits on national roads requires the approval of TII, it is not appropriate to specify a timeframe for this.

A Local Transport Plan is currently being developed in conjunction with the NTA to identify transport requirements and solutions for Monaghan Town. The LTP will set out the outcomes of an Area Based Transport Assessment (ABTA) with the overall aim of improving the current sustainable transport offering. Recommendations from the MLUTS and LTP will be taken into account when considering road proposals.

The Planning Authority agrees to amend the text of section 10.7 to take account of the requirements to achieve the required design standards which conform with the MLUTS. Text amendments as follows:

The two bullet points at 10.7, paragraph 4 are to be omitted, which read as,

- the relocation of the 60 kph speed limit zone 440m west of its existing location, and
- a new junction design on the N54.

and replaced with the following

Recognising the strategically important parcel of zoned industry, enterprise and employment lands at Tullygrimes and Cornecassa Demesne, Monaghan County Council will facilitate and promote the sustainable development of these lands to consolidate, expand and complement existing significant enterprise activities at this location. The Monaghan Land Use and Transportation Study (MLUTS) recommend the relocation of the 60 kph speed limit westwards on the N54. To facilitate this the following is required:

- The relocation of the 60kph speed limit zone 440m west of its existing location, and
- A new gateway to the west of Monaghan Town.

Chief Executive Recommendations

Amendments to text of Paragraph 4 of section 10.7 are required.

Amend paragraph 4 of section 10.7 as follows (additional text in red):

Recognising the strategically important parcel of zoned industry, enterprise and employment lands at Tullygrimes and Cornecassa Demesne, Monaghan County Council will facilitate and promote the sustainable development of these lands to consolidate, expand and complement existing significant enterprise activities at this location. The Monaghan Land Use and Transportation Study (MLUTS) recommend the relocation of the 60 kph speed limit westwards on the N54. To facilitate this the following is required:

- The relocation of the 60kph speed limit zone 440m west of its existing location, and
- **A new gateway to the west of Monaghan Town.**

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-82</u>	Clarlan Limited c/o CS Hughes Planning and Development Consultant	Lands at Killygowan, Monaghan Town	20

Summary of Submission & Issues Raised

- The submission requests that lands be retained as ‘Proposed Residential A’ instead of ‘Proposed Residential B’.

Introduction

- It is considered appropriate and in accordance with the core principle of proper planning and sustainable development, to retain the existing ‘Proposed Residential A’ zoning designation pertaining to the submission lands
- The landholding to which this report pertains is located within the townland of Killygowan, in County Monaghan
- Killygowan is a well-established residential area, in proximity to the Monaghan Town Centre, which lies only 600m to its north
- It benefits from easy access on to Glen Road, the Ballybay Road and most importantly, national route N2 otherwise known as Dublin road.
- The lands are ideally suited for residential development, as they are well-serviced with regard to infrastructure, accessibility, and proximity to the town centre, and necessary amenities.

Comparison of Recent, Draft and Suggested Zoning Maps

- It is noted that the subject lands have been dezoned from the existing zoning of ‘Proposed Residential A’ (*MCDP 2019-2025*) to ‘Proposed Residential B’ (*Draft MCDP 20225-2031*).
- The subject lands are located within the environs of Monaghan Town. Monaghan Town is the county town of County Monaghan, a border county with Northern Ireland, and the largest town within Monaghan with a population of c. 8,000.
- The subject lands are located within an existing residential area of Monaghan Town, that is well-connected, easily accessible and well-serviced with infrastructure, facilities and amenities.
- The lands are surrounded by existing residential neighbourhoods, and so, the zoning of this land for residential use would support the sustainable development and consolidation of Monaghan Town Centre/Environs.
- At present, the site is underutilised as a greenfield site, surrounded by single-home, detached dwellings on generous plots of land. However, the landowner expresses great interest in developing these lands for a higher-density residential use and aims at submitting a planning application for the same imminently. This is evidenced in the forthcoming planning application for 33 no. residential units which will be submitted to the Council for consideration in the coming weeks. The planning application demonstrates that a high-quality residential development can be imminently achieved on the lands and supports the retention of the lands as ‘Proposed Residential A’ zoned lands.

Submission Lands

- The subject lands comprise a greenfield site located within the Killygowan townland in County Monaghan and extends to approximately 1.3 hectares. The site is positioned close to the intersection of Cootehill Road (R188) and Ballybay Road (R162), providing convenient access to the main motorway routes in the area. The submission lands have a considerable road frontage, presenting c.100m along its eastern boundary, on Glenview Heights.

- The landscape within the site is largely plain, with a very gradual slope, under 1%, and comprises predominantly unmanaged grassland with hedgerows along the boundaries. The surrounding land use includes a mix of suburban housing and few commercial premises.
- The submission lands are situated approximately 600m from the periphery of Monaghan Town Centre, benefiting from proximity to essential services, local amenities, and accessible infrastructure within Monaghan. Monaghan Town and its surrounding environs are notably well-suited to private-vehicle use, with an efficient road network facilitating connectivity to both local and regional destinations, such as Dublin, Galway, and Letterkenny in Ireland and Belfast and Derry in Northern Ireland. It is essential to note a new proposed road close to the submission lands. This will further enhance the ease of accessibility of the site.
- Public transportation to the site is provided via the Beechgrove/Tully bus stop, located within a 5-minute walking distance from the site. This stop serves the TFI Local Link Route MN2, linking Monaghan Town to Castleblayney, further enhancing the site's connectivity within the surrounding region.
- This site offers the potential for a well-planned higher-density residential development within an area that combines a rural character with urban connectivity, making it ideal for future residential and mixed-use proposals. While it is noted that the site is framed within a semi-rural, low-density suburban context, the current lack of newer, and more versatile residential accommodation is starkly highlighted, the provision of which, on this site, can help address the continuous demand for housing in Ireland.
- It can be noted that lands to the north-west and to the south of the submission lands have retained their 'Proposed Residential A' land use zoning under the Draft Monaghan County Development Plan 2025-2031. It is submitted that the landowners site is of an appropriate scale and location to accommodate adequate higher-density residential development.
- The site is notably less than a 10-minute walk from the Ulster Canal Greenway and Cycle Trail, which passes through Monaghan Town Centre. The Greenway passes three bridges, a lock house, and two locks, which form part of Monaghan Town's heritage. A tributary, part of the Ulster Canal, passes along the northwestern boundary of the submission lands.
- Retaining the land use zoning of the subject site as 'Proposed Residential A' will provide consolidation of the lands that are situated in a prime location adjacent to Monaghan Town Centre. The submission lands are surrounded by residentially zoned lands, existing low-density residential estates, and accessibility to basic services and amenities, making any future residential development at the submission lands ideal for supporting and enhancing the growth of the area.

Planning Context of the subject land

MCDP 2019-2025

- The Monaghan County Development Plan 2019-2025 identified three primary land use zoning objectives with regards to the delivery of future residential development Proposed Residential A, Proposed Residential B and Strategic Residential Reserve
- It is noted, having regard to the variations to the Monaghan County Development Plan 2019-2025 which have occurred in the interim period following the adaptation of this plan, that almost 25 hectares (24.84) of lands subject to the Strategic Residential Reserve within Monaghan Town have since been de-zoned thus limiting the extent of land suitable for residential development within the town
- With regards to the subject lands, under the provisions of the current Monaghan County Development Plan 2019-2025, the submission lands are zoned 'Proposed Residential A'
- Considering that Monaghan Town has been designated a Tier 1 – Principal Town under the settlement hierarchy for County Monaghan, and the proximity of the submission lands to the Town Centre (c.600m), the highest density that can be appropriately applied on the site under the current Development Plan is 20 units per hectare.

Draft MCDP 2025-2031

- Under the Draft Monaghan County Development Plan 2025-2031, the submission site has been de-zoned 'Proposed Residential B'
- Monaghan Town is designated as the only Tier 1 'Principal / Key Town' within Monaghan in the Draft Monaghan County Development Plan 2025-2031
- It is of note that the land uses listed above for both 'Proposed Residential A' and 'Proposed Residential B', are the same, however, the density expectations from both land uses are different, with 'Proposed Residential A' aimed at offering higher-density residential accommodation along with improved services, while 'Proposed Residential B' is reserved for low-density residential development to match existing low-density developments in the surrounding.
- Submission cites Policies and Objectives from the Draft MCDP 2025-2031 that support the submission including MTSO1, CCSO1, CSO1 and the Core Strategy
- Under 'Appendix 16 – Infrastructure Assessment and Settlement Capacity Audit', the submission lands have been referenced as MT12 – Killygowan Townland. MT12 has been regarded as a Tier 1 Zoned Land, with all the necessary infrastructure available, inclusive of Foul Sewerage Drainage, Water Supply, Surface Water Drainage, Road Access, Public Footpath, and Public Lighting. It is submitted that the designated land use zoning of 'Proposed Residential B' under the draft Development Plan to be in total contradiction of the above assessment. Given that the site has access to high-quality infrastructure and is located close to the Town Centre, it appropriate for the site to retain its 'Proposed Residential A' land use zoning objective.

Submission Request

In summary, this submission requests that Monaghan County Council considers the following:

That the submission lands zoned 'Proposed Residential B' under the Draft Monaghan County Development Plan 2025-2031 be retained under 'Proposed Residential A'.

Development Context

- The subject site is directly accessible via Glenview Heights on its eastern boundary, and presents a road frontage of c.100m, and as such can be developed swiftly, subject to planning permission being granted
- Additionally, as the overall lands under our client's ownership extend up till Cootehill Road (R188), the site can be accessed from its western boundary as well
- Our client is eager to develop the site for a higher-density residential scheme, subject to the retention of the 'Proposed Residential A' zoning objective and would be willing to engage with the Planning Authority in this regard
- It is further noted that our client intends to submit an application for a residential development of 33 no. units in accordance with the current 'Proposed Residential A' zoning objective pertaining to the lands
- The planning application demonstrates that retention of the current zoning objective is in accordance with the principles of the proper planning and sustainable development of the area.

Access

- With regards to the accessibility of public transport, it is noted that the site is situated within a 5-minute walking distance of the Beechgrove/Tully bus stop on Cootehill Road, which is served by TFI Local Link Route MN2, linking Monaghan Town to Castleblayney
- The site is also a 7-minute walk from the Monaghan County Council bus stop, which is served by Bus Éireann Intercity Route 175, which connects Monaghan Town to Cavan, strengthening the site's connectivity with the surrounding region

- The Monaghan Bus Station, located in Monaghan Town Centre, is at a 20-minute walking distance from the submission lands, and provides frequent access to Dublin Airport via Bus Éireann's Expressway Route no. 32, as well as Translink Goldline's Route no. X3
- In addition to public transportation, the submission lands are well-suited to access by private vehicles, due to a myriad of national and regional motorways passing close to the site.
- The site has excellent connectivity via road to major cities in Ireland and Northern Ireland
- It is noted that the submission lands are extremely accessible by car, which is favourable for residential development, and for attracting residents from major employment hubs
- Dublin Airport and Belfast Airport, both are a c.1.2hrs drive from the subject site, in the south-east and north-east directions respectively. Both are international airports, providing commercial airline services to national and European destinations
- The availability of reliable public transport services and accessibility to efficient road network within such close proximity to the subject site is seen as the principal factor with regard to its zoning to provide for residential development
- The use of the site to accommodate a planned and co-ordinated residential scheme in place of existing greenfield space will allow for the greater use of existing public transport services and will support the economic growth of these services as well as the growth of Monaghan Town as a Principle/Key Town, in line with regional policies.

Local Services

- Upon review of the area surrounding the subject site in Monaghan Town, it is considered the submission lands would be underutilised as an area of low-density residential development, due to its location in close proximity to the town centre and the myriad of amenities and services available
- It is thus requested that Monaghan County Council retain the land in its entirety under 'Proposed Residential A'
- The recreational facilities within the immediate area include the Coral Leisure Club, the Skateboard Park, and the Ulster Canal Greenway for pedestrian and cyclists
- The site has ease of access to services such as a convenience store and a fitness club, within a 10-minute walking distance
- A variety of options for shopping and dining are available within the Monaghan Town Centre, only c.600m from the site
- Further to this, there is an abundance of national and secondary schools within the Town Centre, easily accessible to the site, all of which are within a 25-minute walking radius of the site
- Further to the above, it is noted that the Rossmore Forest Park, is only a 15-minute drive from the submission lands, and forms an essential part of Monaghan's Tourism. It includes a playpark for children, a giant sculpture trail, picnic areas, lakeside walks, and viewing points, with free entry
- The development of the subject site presents an opportunity to guide the location of the future population of Monaghan Town to an area within close proximity to existing amenities and public transport services
- Moreover, the site is of sufficient size to accommodate ancillary community services as part of any potential residential development.

Infrastructure

- It is submitted that the submission lands are adequately serviced
- All roads within immediate access to the site have been maintained in good condition, and two new roads have been proposed in close proximity to the site
- Moreover, existing street lighting is in place on the site's western and eastern boundaries, indicating acceptable levels of visibility for pedestrians

- The Infrastructure Assessment and Settlement Capacity Audit undertaken by Monaghan County Council, clearly indicates the submission lands under MT12 area, to be Tier 1 Zoned lands, with an excellent availability of all essential infrastructure
- It is submitted that the submission lands are clearly well-suited for a higher-density residential scheme, which can appropriately utilise the available facilities and services of the site and provide for a much-needed housing development to support the local population.
- A well-designed development on this site can help in attracting talent from nearby towns and cities, and contribute to the growth Monaghan Town and County Monaghan.

Planning Policy - National Level

Regional Spatial and Economic Strategy for the Northern and Western Region

- The RSES designates Monaghan Town as a Key Town which occupies a strategic border location along the Dublin to Letterkenny/ Derry City corridor, and adjacent to the Dublin/Belfast eastern economic corridor.
- The RSES recognises the strategic development potential of Monaghan Town due to the availability of industry, enterprise and employment zoned lands and its proximity to Dublin.
- With regards to population growth, the RSES identifies that growth within the town is to be targeted at the delivery of compact growth with a mix of housing densities and plot ratios necessary due to the difficult topography of the town.
- As the submission site is located within the centre/environs of Monaghan Town, it is considered that the rezoning of the site to provide residential units is compliant with the Regional Spatial and Economic Strategy for the region as it will be providing much-needed accommodation within an existing built-up area within a Key Town.

Project Ireland 2040 – National Planning Framework

10 no. National Strategic Outcomes as follows:

1. Compact Growth

The submission site is located within the centre of Monaghan Town; thus it is located within close proximity to existing transport infrastructure including Bus Eireann bus services. We consider it representative of an appropriate location for residential development and the consolidation of this area. The development of the site allows for increased permeability within the immediate area and for the increased viability of existing local community infrastructure.

2. Enhanced Regional Accessibility

The subject site is located within 1.7kms of Bus Eireann services available via the Monaghan Bus Station in the Town Centre. As such, it is considered that the subject site is well serviced by public transport offering direct access to larger urban centres at Dublin, Galway and Letterkenny.

3. Strengthened Rural Economies and Communities

The development of the submission site presents a direct opportunity to consolidate development within the centre of Monaghan Town. A significant residential development at this location will result in the increased viability of commercial services within the immediate area and presents the potential for the further expansion of Monaghan Town.

4. Sustainable Mobility

In compliance with national policy guidance, the co-ordinated development of the submission site would ensure that all built form is constructed to the highest architectural standard and is suitably energy-efficient and equipped for challenges anticipated from a changing climate.

5. A Strong Economy supported by Enterprise, Innovation and Skills

The development of the submission site and associated consolidation of Monaghan Town could result in a heightened extent of commercial development, enterprise and innovation within the town in the future which would diversify and strengthen the local community.

6. High Quality International Activity

Monaghan Town is both strategically located and served by infrastructure so as to represent a unique location for the development of a sustainable urban centre. Whilst the development of this area will have no direct impact on international competitiveness, it is considered that the guided development of Monaghan Town and Monaghan more broadly, presents an opportunity to set an international precedent for sustainable development.

7. Enhanced Amenity and Heritage

The development of the submission site presents a direct opportunity to improve permeability within the immediate area through the improvement of the existing underutilised green fields into residential development with adequate amenity space and open space.

8. Transition to a Low Carbon and Climate Resilient Society

As stated previously, all built forms within the submission site will be suitably energy-efficient and equipped for challenges anticipated from a changing climate.

9. Sustainable Management of Water, Waste and other Environmental Resources

Any development of the submission site would be in line with the principles of Irish Water and the sustainable management and development of the area.

10. Access to Quality Childcare, Education and Health Services

The subject site is situated within proximity to various primary and secondary schools. Furthermore, with regard to local amenities, it is noted there are a range of local shops, restaurants, public houses and services available in the town. The further development of the area and associated increase in population growth is considered necessary to provide an economic justification for the provision of improved recreational and educational services with the provision of shopping facilities generally calculated on the extent of the local population available to avail of such services.

It is thus submitted that the subject site, which would be considered an underutilised agricultural site, would be best utilised by residential development and would therefore be consistent with the provisions of the National Planning Framework.

5.2.1 National Planning Framework Review

- The draft revisions of the NPF identifies an increased national population growth target of 6.1 million residents by 2040
- In the context of this submission, that the Northern and Western Region (NWRA) is expected to accommodate 10% of this increase in population growth with the population of the region expected to rise by 150,000 between 2022 and 2040 to a total of 1million.
- The draft revision notably reaffirms the focus on renewing and developing existing settlements as established under the NPF 2018, rather than allowing the continual expansion and sprawl of cities and towns out into the countryside, at the expense of town centres and smaller villages. The target is for at least 40% of all new housing to be delivered within the existing built-up areas of cities, towns and villages on infill and/or brownfield sites. The rest of our homes will continue to be delivered at the edge of settlements and in rural areas.
- With regards to key changes between the NPF 2018 and the draft revision, it is noted that number of houses required per annum has increased from between 30-35,000 per annum to a total of 50,000. Whilst this change is considered to reflect the ongoing housing crisis within the country it is noted that the document makes no specific reference to changing household sizes or increased demand for housing.
- The draft revision also places greater emphasis on land activation and active land management to ensure transport orientated development (TOD) opportunities are realised at greenfield and brownfield sites adjacent to public transport hubs. The revision makes reference to the creation of measures such as the Residential Zoned Land Tax and Land Value Sharing with the purpose of such tools being to better manage the supply of development land, to meet housing land requirements, ease pressure on building land and housing costs and to capture gains in land value from the development process for investment in necessary public infrastructure.

Urban Development and Building Heights - Guidelines for Planning Authorities, December 2018

- These guidelines are intended to set out national planning policy guidelines on building heights in relation to urban areas, as defined by the census, building from the strategic policy framework set out in Project Ireland 2040 and the National Planning Framework. The guidelines outline that there is significant scope to accommodate anticipated population growth and development needs, whether for housing, employment or other purposes, by building up and consolidating the development of our existing urban areas.
- It is considered that the subject site is appropriately located so as to accommodate a residential development of appropriate density within the centre of Monaghan in close proximity to existing public transport services and amenities. The design of any future development can respond to the topography of the area and the nature of the existing built form so as to limit any impacts on existing amenities. The site is located within the centre of the immediate area and presents a direct opportunity to consolidate and guide the future growth of the area in a manner that limits the need for unsustainable commuting patterns and improves the sense of community and safety within the wider area. The development of the site is thus considered to be appropriate in the context of the Urban Development and Building Heights - Guidelines for Planning Authorities, December 2018.

Quality Housing for Sustainable Communities – Guidelines for Planning Authorities

- The purpose of these Guidelines is to assist in achieving the objectives for Delivering Homes, Sustaining Communities contained in the Government Statement on Housing Policy which focuses on creating sustainable communities that are socially inclusive by promoting high standards in the design and construction and in the provision of residential amenity and services in new housing schemes.
- Residential development on the subject site would allow for the greater utilisation of these existing services and would allow for the formation of a strong community within the centre of Monaghan Town in accordance with the provisions of the Quality Housing for Sustainable Communities – Guidelines for Planning Authorities (2007).

Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024)

- As of January 2024, the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities supersede the Sustainable Residential Development in Urban Areas (2009).
- With an emphasis on sustainable residential development and the formation of compact settlements, the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities establish national planning policy and guidelines pertaining to the planning and development of urban and rural settlements. Under said guidelines, settlement types are categorised on their area types and are allocated a guiding density range. With the subject site being located in Monaghan Town, this means it can be described under the ‘Key Towns and Large Towns (5,000+ population)’. The key priorities for such towns, in order of priority, are to:
 - a) plan for an integrated and connected settlement overall, avoiding the displacement of development generated by economic drivers in the Key Town or Large Town to smaller towns and villages and rural areas in the hinterland,*
 - (b) strengthen town centres,*
 - (c) protect, restore and enhance historic fabric, character, amenity, natural heritage, biodiversity and environmental quality,*
 - (d) realise opportunities for adaptation and reuse of existing buildings and for incremental backland, brownfield and infill development, and*

(e) deliver sequential and sustainable urban extension at locations that are closest to the urban core and are integrated into, or can be integrated into, the existing built up footprint of the settlement.

- Compact growth has been recognised as key to the renewal of existing settlements, with an overall goal to reduce continued sprawl. The subject guidelines recognise the benefit of consolidation which improves access to services, ensures efficient use of land and allows for greater integration with existing infrastructure and public transport. It is accepted that compact growth is essential, particularly along transport corridors that support the more efficient use of energy and contribute to the achievement of net zero carbon emissions and other climate action targets by 2050.
- As a final point, it is considered that the location of the subject site is representative of ‘Key Town / Large Town - Centre and Urban Neighbourhood’ as defined under Table 3.5 ‘Areas and Density Ranges Key Towns and Large Towns (5,000 population)’ of the subject guidelines. In this regard the following commentary is noted as it relates to the appropriate density range for development at such locations:
‘The centre comprises the town centre and the surrounding streets, while urban neighbourhoods consist of the early phases of residential development around the centre that have evolved over time to include a greater range of land uses. It is a policy and objective of these Guidelines that residential densities in the range 40 dph-100 dph (net) shall generally be applied in the centres and urban neighbourhoods.’
- A residential development upon the subject site in compliance with the above density range would comprise a scheme of between 50-130 dwellings. However, given that Monaghan’s general pattern of development is low-density housing, and within 18 dph on average as per the Draft Development Plan, we would consider a density slightly higher than 18dph to be appropriate for the submission lands, while not meeting the compact settlement guidelines of 40-100 dph. Such a development of the subject site should be considered appropriate to ensure the sequential development of Monaghan Town and the appropriate consolidation of the towns development boundary.

Planning Application

- McGuigan Architects, on behalf of our client, is actively preparing a planning application for the subject lands with the intention of submitting the application by the end of 2024. The presence of a live planning application during the preparation phase of the County Development Plan provides a compelling planning rationale for retaining the ‘Proposed Residential A’ zoning designation.
- With site layouts and preliminary designs already under development, this forthcoming application reinforces the suitability and readiness of the subject lands to support the ‘Proposed Residential A’ zoning, as it aligns with Monaghan County’s objectives for urban housing growth and efficient land use, as well as higher density than the current average of 18 dwelling per hectare.
- The proposed development will provide for 33no residential dwellings, achieving a density of 25 dwellings per hectare. Approximately 2550 sq.m of open space will be maintained to serve the residential scheme, and additionally each unit has been designed with ample private open amenity space. Vehicular access to the site will be provided via Glenview Heights, while a secondary pedestrian route will be provided via Cootehill Road (R188). All dwellings will be provided the appropriate amount of vehicular parking places as per the Development Plan guidelines. The site will be complemented by a wide visual open space to the west of the submission lands (also under the ownership of the client). This has been proposed to maintain maximum natural vegetation and landscape in the area.
- This proactive submission highlights the viability and commitment to developing these lands at a density consistent with the objectives of ‘Proposed Residential A’ zoning as well as

Compact Settlement guidelines, supporting the local authority in their goal to accommodate sustainable residential development. By retaining the 'Proposed Residential A' zoning, the council would allow for the delivery of much-needed housing on lands already positioned for high-density use, which is critical given the strategic location of these lands and the growing demand for residential options in the area of Killygowan.

Conclusion

- This submission is prepared in response to the Draft Monaghan County Development Plan 2025-2031 which has been prepared in replace of the existing Monaghan County Development Plan 2019-2025.
- In summary, this submission requests that Monaghan County Council consider the following: *That the submission lands zoned 'Proposed Residential B' under the Draft Monaghan County Development Plan 2025-2031 be retained under 'Proposed Residential A'*
- It is requested that the recommendations of this submission be given full consideration in preparation for the forthcoming Monaghan County Development Plan 2025-2031. As presented throughout this report, the landholding to which this report pertains is located within the periphery of Monaghan Town, the strategically located and serviced county town of Monaghan.
- The submission lands are serviced by the TFI Local Link MN2, towards Castleblayney, and is well-suited for private transportation to nearby cities of Dublin, Galway, Letterkenny in Ireland, and Belfast and Derry in Northern Ireland. The site is surrounded by an established pattern of low-density residential estates, with potential for further housing development to consolidate the area and support the growth of Monaghan Town.
- McGuigan Architects, on behalf of our client, is actively preparing a planning application for the subject lands with the intention of submitting the application by the end of 2024. The presence of a live planning application during the preparation phase of the County Development Plan provides a compelling planning rationale for retaining the 'Proposed Residential A' zoning designation.
- The Draft Monaghan County Development Plan 2025-2031 has de-zoned from the existing zoning of 'Proposed Residential A' to 'Proposed Residential B'
- The submission lands are better suited for 'Proposed Residential A' land use zoning given the location of the land in proximity to the centre of Monaghan Town and given the increase in population across the country, as well as their ease of access to amenities, public transport.
- Furthermore, it is submitted that the imminent planning application for the development of a higher density residential scheme, will suitably address the zoning objectives for 'Proposed Residential A' land use, and provide for a well-thought-out housing development, which would further support the growing population of Monaghan Town and County Monaghan as a whole.

Chief Executive Response

The submission requests that lands be retained as 'Proposed Residential A' instead of 'Proposed Residential B'.

The submission lands are located within the townland of Killygowan, Monaghan Town within an existing residential area of the town and c600m south of the Town Centre. The lands have a road frontage of c100m along Glenview Heights.

The subject lands are within the settlement envelope, are Tier 1 'Serviced Zoned Land' and are zoned proposed Residential B in the Draft Plan.

Clarlan Limited have submitted a planning application under Plan Ref No24/60456 for 34no. residential dwellings, open space, vehicular access onto Glenview Heights and pedestrian access onto the Cootehill Road.

The Core Strategy of the Development Plan recognises the role of settlements in driving the development of the County and identifies the scope of development possible for the County, while remaining consistent with National and Regional policy. It also identifies the quantum and location of development for the plan period, consistent with the population targets and settlement hierarchy that reflects the availability of existing services, planned investment, sequential development and environmental requirements.

Whilst it is acknowledged that these Tier 1 lands have services available to them, the subject lands are located south of the town centre, and there are sufficient lands suitable for Proposed Residential A in more sequentially appropriate locations to meet the projected population increase over the plan period.

It is recommended that the subject lands be zoned 'Proposed Residential B' to provide for the development of lower density houses within the urban settlement of Monaghan Town which may provide suitable housing to meet the needs of people who might otherwise seek to build a one-off dwelling in the rural area.

On this basis, and to ensure compact growth of Monaghan Town, the subject lands are most appropriately zoned 'Proposed Residential B'.

Chief Executive Recommendation

No amendment recommended.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-85</u>	Joe Mallon	Tirkeenan, Monaghan Town	21

Summary of Submission & Issues Raised

- Wish to have a portion of land rezoned for housing purposes.
- The site is outside the sewage works restriction area and had previously been zoned for housing.
- The site is very close to the town centre and is an extension of an existing row of house, so it would seem to be natural to use it for residential development.

Chief Executive Response

The submission seeks a zoning amendment from 'Industry/Enterprise/Employment' to residential.

The submission states that the subject lands were previously zoned for housing. Both the Monaghan County Development Plan 2013-2019 and 2019-2025 zoned the subject lands for Industry, Enterprise and Employment. The subject land however formed part of town centre zoning within the 2006-2013 County Development Plan.

Having reviewed the subject lands and considered their proximity to the established enterprises on zoned 'Industry, Enterprise and Employment' lands to the north, in the interests of ensuring compatible land uses, the requested rezoning from 'Industry, Enterprise and Employment' to residential is not recommended. Furthermore, the proximity of Monaghan Town Waste Water Treatment Facility to the subject lands are noted and the close proximity and its potential to impact on smell sensitive development is also another reason why the subject lands are not recommended to be zoned for residential purposes.

Chief Executive Recommendation

No amendment recommended.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-86</u>	Joe Mallon	Dummy Lane, Anahagh, Monaghan Town	22

Summary of Submission & Issues Raised

- Submission requests a rezoning from ‘Landscape Protection/Conservation’ to residential use.
- Outline planning permission for a dwelling was previously granted on the subject lands (08/1165).
- Submission states there was a lot of work involved in this application including water levels measurements as well as negotiations with Waterways Ireland and Eastern Regional Fisheries Board.
- It would be regretful that this opportunity should be lost when there is an increasing demand for housing sites in the local area.

The submission includes supporting documentation which includes;

- Copy of Final Grant issued by Monaghan County Council for file number 08/1165
- Correspondence from Waterways Ireland dated 21 November 2008.
- Correspondence from Waterways Ireland dated 24 July 2008.
- Correspondence from Eastern Regional Fisheries Board dated 14th November 2008.

Chief Executive Response

The subject lands are designated as ‘Landscape Protection / Conservation’. The land use zoning objective for landscape protection/conservation, LUO 10, states *“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. To only permit development where it has been clearly demonstrated to the satisfaction of the Planning Authority that the development will not be contrary to the overall zoning objective of the lands, for example the provision of open space or services to adjoining land uses”*.

The Strategic Flood Risk Assessment (Appendix 19) identifies that the subject lands lie within Flood Zone B (moderate probability of flooding). Section 3.5 of the Flood Guidelines indicates that development in Flood Zone B should be avoided and/or only considered in exceptional circumstances. Considering the flood constraints on the subject lands, it is not considered appropriate to zone them for residential purposes.

Chief Executive Recommendation

No amendment recommended.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-87</u>	Phyllis Moffett c/o Hughes Planning and Development Consultant	Lands at Cootehill/Ballybay Road, Monaghan Town	23

Summary of Submission & Issues Raised

The submission requests a partial rezone the subject lands from the existing “Proposed Residential A” to “Strategic Residential Reserve”.

Comparison of Recent, Draft and Suggested Zoning Maps

- the subject lands have remained unchanged from the existing zoning of Proposed Residential A and Existing Commercial
- Request for the partial rezoning of the subject lands to Strategic Residential Reserve
- The subject lands are located within the environs of Monaghan Town. Monaghan Town is the county town of County Monaghan, a border county with Northern Ireland, and the largest town within Monaghan with a population of c. 8,000
- The subject lands are located within an existing residential area of Monaghan Town, that is well-connected, easily accessible and well-serviced with infrastructure, facilities and amenities. The lands are surrounded by existing residential neighbourhoods, and so, the zoning of this land for residential reserve would support the sustainable development and consolidation of Monaghan Town Environs.
- The southern section of land, currently zoned Residential A, is currently a greenfield site, while the northern section of the land, currently zoned Existing Commercial, is occupied by The Fitness Habit, a commercial gym operation
- The site is situated c.1 km from Monaghan town centre, which has an array of local shops, restaurants, pubs and grocery stores within walking distance
- Landowner does not have any interest in developing these lands for residential use at the present time
- The repurposed use of this land for Strategic Residential Reserve would allow residential accommodation to be provided at a future date, once more appropriate sites within Monaghan have been developed
- The landowner does not wish to develop this site at the present time, and so the zoning of Proposed Residential A at the southern end of the site would be misdirected from more suitable sites.
- It is emphasised that our client’s lands are zoned Proposed Residential A and Existing Commercial under the existing Monaghan County Development Plan 2019-2025, thus residential use on this land is currently considered acceptable by the Council
- Request Monaghan County Council consider this submission and rezone the land currently zoned Proposed Residential A to Strategic Residential Reserve.

Submission Lands

- The land subject to this submission extends to approximately 1 hectare and has an existing commercial activity operating at the northern end of the site
- The site is bound to the immediate west and further south by existing residential neighbourhoods and to the immediate east by an open greenfield site
- Lands to the northeast are zoned for Industry/Enterprise/Employment and further to the east for Recreation/Amenity.
- The site is located 1.4 km from the Monaghan Town Centre which has an array of local shops, amenities and facilities.

- There is a Spar located approximately 380 metres to the north of the site, selling a limited variety of household goods.
- It is noted that a large section of land to the immediate east of the site is zoned Proposed Residential A under the Draft Monaghan County Development Plan 2025-2031.
- These lands adequately meet the development needs of the town, and the submission lands can be de-zoned to Strategic Residential Reserve without impacting on the housing supply of the town
- The immediate area surrounding the subject lands is characterised by residential housing with some commercial and industrial activity also taking place
- The area is somewhat serviced by public transport, being situated c.270 metres from a bus stop servicing the MN2 route, which runs into town every 2-3 hours
- Further to this, public transport services are available via Bus Eireann Intercity bus nos. 162, 175, 175a, and 182 to Dundalk, Cavan, and Drogheda
- The bus station for Bus Eireann services is located a c. 30 minute walk from the subject site
- The rezoning of the submission lands to Strategic Residential Reserve will ensure appropriate residential development can occur closer to the Monaghan town centre, where services are better provided for and future residents can more easily meet their daily needs
- As shown by the above figures, the land is surrounded by a mix of residential and commercial activities, so is best suited for Strategic Residential Reserve to meet the needs of housing demand once all other options have been exhausted.

Planning Context of the subject land

MCDP 2019-2025

- It is noted, having regard to the variations to the Monaghan County Development Plan 2019-2025 which have occurred in the interim period following the adaptation of this plan, that almost 25 hectares (24.84) of lands subject to the Strategic Residential Reserve within Monaghan Town have since been de-zoned thus limiting the extent of land suitable for residential development within the town.

Draft MCDP 2025-2031

- Under the Draft Monaghan County Development Plan 2025-2031, the submission site has been zoned Proposed Residential A and Existing Commercial
- Monaghan Town is designated as the only Tier 1 'Principal / Key Town' within Monaghan in the Draft Monaghan County Development Plan 2025-2031
- The Draft Development Plan 2025-2031 aims to progress the development of Monaghan Town as a connected centre of scale, with the necessary critical mass, in terms of population and employment, to enable the area to compete and grow to fulfil its potential and drive regional and national development.
- The submission lands extend to 1 hectare, of which 0.55 hectares are occupied with the existing commercial activity The Fitness Habit
- It is considered inappropriate to develop the remaining portion of the land as it would disturb the existing commercial use, and access to the site is inadequate to support development at this time
- It is of note that the land uses listed above for Proposed Residential A and Strategic Residential Reserve serve different purposes, with Proposed Residential A enabling residential development in the immediate future and Strategic Residential Reserve being provision of 'back-up' land
- It is considered that the draft land use zoning objective for the submission lands is premature, and has not taken into account the use of existing commercial at the northern end of the site or the restricted access off Cootehill Road

- Request the Council to rezone the subject lands to Strategic Residential Reserve in order to support more consolidated growth near the existing services of Monaghan Town, in line with the sustainable development and planning of the area
- The proposed zoning of Proposed Residential A at the southern end of the site has not taken into consideration these objectives, as residential development should be prioritised closer to the Town Centre in a balanced and sustainable manner. The subject site does not enable residential development which will meet these objectives
- While the site is located within a 10-15 minute walk of the Monaghan Town Centre and has been identified as a site appropriate for infill development, this has not taken into consideration the existing use of the site with a commercial activity and the restricted access off Cootehill Road. MT14 encompasses a considerable land area, so the removal of this section of land from this Tier 1 zoning will not significantly impact on the capacity of this area. By freeing up this section of land and downzoning it to Strategic Residential Reserve, this will free up capacity elsewhere in Monaghan to be utilised by a site owner with plans to develop their site in the immediate future.

Submission Request

In summary, this submission requests that Monaghan County Council considers the following:

- *That the section of the submission lands zoned Proposed Residential A under the Monaghan County Development Plan 2025-2031 be rezoned Strategic Residential Reserve*

Development Context

- The subject site is directly accessible via Cootehill Road and Ballybay Road
- The northern end of the site is currently occupied by an existing commercial activity, The Fitness Habit, and is accessed off Ballybay Road. The southern section of the site, which is proposed to be zoned Proposed Residential A, is accessed off Cootehill Road
- The existing access to the southern section of the site is not sufficient to enable residential development to take place on the site, and as such the zoning is inappropriate
- The landowner has no intention to develop the site within the immediate future and does not wish to compromise the existing commercial use on site.

Access

- With regards to the accessibility of public transport, it is noted that the site is situated c.270 metres from a bus stop servicing the MN2 route which goes into Monaghan town centre every 2-3 hours
- Further to this, public transport services are available via Bus Eireann Intercity bus nos. 162, 175, 175a, and 182 to Dundalk, Cavan and Drogheda
- The bus station for Bus Eireann services is located c. 1.8 km from the subject site.
- The locations of the bus stops in relation to the site are also noted
- The lack of reliable public transport services within close proximity to a site of residential development is seen as a key factor with regard to its unsuitability for increased density
- The use of the subject site to develop a residential scheme will put additional pressure on the road network, as future residents would be wholly reliant on a private vehicle to access the Town Centre and meet their daily needs
- In addition to public transport services, the subject site is situated in excess of a two-hour drive from Dublin
- There are multiple journey options available including the N2 – M2 – Dublin, or the N2 – N33 – M1 - Dublin. Moreover, Dundalk is situated a 50-minute drive from Monaghan and is accessible via the N2 – N53 – Dundalk

- Considering the above, it is considered that the submission lands are only somewhat accessible via public transport and future residents would be mainly reliant on a car, which is not favourable for residential development.

Local Services

- Upon review of the area which indicates the subject sites' location outside of Monaghan's town centre, it is considered that the subject site would be inappropriate for residential development due to its location on the outskirts of Monaghan and the services available
- It is thus requested that Monaghan County Council rezone the southern portion of the site to Strategic Residential Reserve zoning
- The recreational facilities within the surrounding area include Monaghan Rugby Club, Coral Leisure Centre, Omniplex Cinema, Monaghan United Football Club, Rossmore Forest Park, a Skateboard Park, Monaghan County Museum, Blayney Academy Football Club, McCarren's Pub, the Universal Combat Arts Academy and The Fitness Habit
- There are shopping facilities, for local groceries and other services, within c. 1 km from the subject site, or c. 30 minutes walking distance. Further to this, the Ulster Canal runs through the town, as well as the Ulster Canal Greenway, c.1 km from the subject site
- Further to this, there is a selection of national and secondary schools within the vicinity, as well as Gaelscoil Ultain
- There are 4 no. schools within 1 km of the submission lands and St Louis Secondary School is situated a 15 minute walk from the subject site
- Further to this, there is a selection of national and secondary schools within the vicinity, as well as Gaelscoil Ultain
- There are 4 no. schools within 1 km of the submission lands and St Louis Secondary School is situated a 15 minute walk from the subject site
- The location of Monaghan as a centre for smaller settlements means that development of the town should be well thought out and within close proximity to existing amenities and public transport services
- The location of the subject site does not provide for this, and there are better suited sites throughout the town which can serve future residents more appropriately.

Infrastructure

- It is submitted that the submission lands are inadequately serviced by existing infrastructure
- Currently the existing commercial activity taking place at the northern end of the site is accessed off Ballybay Road
- The southern portion of the site is unable to use this access, and instead is accessed from Cootehill Road
- The access point from Cootehill Road is insufficient to meet the needs of future residents, as it is unformed and narrow
- In light of the above, it is considered that the submission lands are not located or well-served for future residential development.

Policy- National Level

Regional Spatial and Economic Strategy for the Northern and Western Region

- The RSES recognises the strategic development potential of Monaghan Town due to the availability of industry, enterprise and employment zoned lands and its proximity to Dublin. With regards to population growth, the RSES identifies that growth within the town is to be targeted at the delivery of compact growth with a mix of housing densities and plot ratios necessary due to the difficult topography of the town.

- As the submission site is located outside of the centre of Monaghan Town, it is considered that the rezoning of the site from Proposed Residential A to Strategic Residential Reserve is compliant with the Regional Spatial and Economic Strategy for the region as it will be ensuring future development occurs in locations which are well-connected and in proximity to goods and services.

Project Ireland 2040 – National Planning Framework

- It is considered prudent to note and respond to the commentary provided within the guidelines in relation to each of the 10 no. National Strategic Outcomes as follows:

1. Compact Growth

The submission site is located on the periphery of Monaghan Town; thus it is located some distance from existing transport infrastructure including Bus Eireann bus services. We consider it is not representative of an appropriate location for residential development and would contribute to the sprawl of this area. The development of the site would require future residents to be reliant on private transportation to meet their daily needs, as these goods and services are located within the town centre.

2. Enhanced Regional Accessibility

The subject site is located c. 1.8 km of Bus Eireann services available via North Road. As such, it is considered that the subject site is not well serviced by public transport offering direct access to larger urban centres such as Dublin, and therefore future residents of the site would be reliant on private vehicles for transportation.

3. Strengthened Rural Economies and Communities

The development of the submission site will not contribute to the consolidation of development within the centre of Monaghan Town. A significant residential development at this location would result in the continued sprawl of the town, reducing capacity of the rural economy and putting additional pressure on the road network to service future dwellings.

4. Sustainable Mobility

Due to the location of the subject site and given the layout of the existing public transport network in Monaghan, any residential development of this site would require future residents to be reliant on private vehicles to meet their daily needs. This is not in compliance with the Sustainable Mobility targets and will contribute to the acceleration of our changing climate.

5. A Strong Economy supported by Enterprise, Innovation and Skills

The development of the southern end of the submission site would put additional pressure on the existing commercial use of the northern end of the submission site and disturb the active commercial uses the site already has. In this case, development of the subject lands would not strengthen the local community and would not be in the best interests of the commercial activities already in operation.

6. High Quality International Activity

Monaghan Town is both strategically located and served by infrastructure so as to represent a unique location for the development of a sustainable urban centre. However, development within the town should be within existing built up areas to maximise use of established infrastructure services and to ensure sustainable development.

The subject site is not best placed to provide this form of residential development, and therefore alternative sites throughout Monaghan should be prioritised.

7. Enhanced Amenity and Heritage

The submission lands are located a distance from the centre of Monaghan Town, and not within the proximity of public spaces, parks or recreational infrastructure. There is opportunity to develop within Monaghan on sites closer to existing residential development, amenity space and open space.

8. Transition to a Low Carbon and Climate Resilient Society

As stated previously, all built forms within the submission site would not be suitably energy-efficient and equipped for challenges anticipated from a changing climate and therefore are not suited to residential development.

9. Sustainable Management of Water, Waste and other Environmental Resources

Any development of the submission site would not be in line with the principles of sustainable management and development of the area.

10. Access to Quality Childcare, Education and Health Services

Monaghan Town has various primary and secondary schools as detailed in Figure 24.0 of this report. Furthermore, with regard to local amenities, it is noted there are a range of local shops, restaurants, public houses and services available in the town. The further development of the town and associated increase in population growth is considered necessary to provide an economic justification for the provision of improved recreational and educational services with the provision of shopping facilities generally calculated on the extent of the local population available to avail of such services.

However, it is submitted that the subject site is not best placed to serve future residents of the town. There are more appropriate locations elsewhere, which are closer to the town centre, and development there would be more consistent with the provisions of the National Planning Framework.

National Planning Framework Review

- With regards to key changes between the NPF 2018 and the draft revision, it is noted that number of houses required per annum has increased from between 30-35,000 per annum to a total of 50,000
- Whilst this change is considered to reflect the ongoing housing crisis within the country it is noted that the document makes no specific reference to changing household sizes or increased demand for housing
- The draft revision also places greater emphasis on land activation and active land management to ensure transport orientated development (TOD) opportunities are realised at greenfield and brownfield sites adjacent to public transport hubs
- The revision makes reference to the creation of measures such as the Residential Zoned Land Tax and Land Value Sharing with the purpose of such tools being to better manage the supply of development land, to meet housing land requirements, ease pressure on building land and housing costs and to capture gains in land value from the development process for investment in necessary public infrastructure.

Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024)

- It is considered that the subject site is not appropriately located so as to accommodate a residential development of increased density as it is located on the outskirts of Monaghan town and a distance from public transport services and amenities
- The site is located on the outskirts of Monaghan and therefore any development of the site would not consolidate and guide the future growth of the area in a manner that supports sustainability or improves the sense of community and safety within the town
- The development of the site is thus considered to be inappropriate in the context of the Urban Development and Building Heights – Guidelines for Planning Authorities, December 2018.

Quality Housing for Sustainable Communities- Guidelines for Planning Authorities

- The site is situated on the outskirts of south Monaghan, with the Bus Eireann services located on the northern side of the town
- There is only one bus stop is close proximity to the subject site, which only services one route. There is no rail station near the subject site
- Residential development on the subject site would not allow future residents to be primarily reliant on public transport as a means of travel, and therefore would not be in accordance with the provisions of the Quality Housing for Sustainable Communities – Guidelines for Planning Authorities (2007).

Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024)

- With the subject site being located in Monaghan Town, this means it can be described under the 'Key Towns and Large Towns (5,000+ population)'. The key priorities for such towns, in order of priority, are to:
 - a) plan for an integrated and connected settlement overall, avoiding the displacement of development generated by economic drivers in the Key Town or Large Town to smaller towns and villages and rural areas in the hinterland,*
 - (b) strengthen town centres,*
 - (c) protect, restore and enhance historic fabric, character, amenity, natural heritage, biodiversity and environmental quality,*
 - (d) realise opportunities for adaptation and reuse of existing buildings and for incremental backland, brownfield and infill development, and*
 - (e) deliver sequential and sustainable urban extension at locations that are closest to the urban core and are integrated into, or can be integrated into, the existing built up footprint of the settlement.*
- As a final point, it is considered that the location of the subject site is representative of 'Key Town / Large Town - Suburban/Urban Extension' as defined under Table 3.5 'Areas and Density Ranges Key Towns and Large Towns (5,000 population)' of the subject guidelines.
- A residential development upon the subject site in compliance with the above density range would comprise a scheme of between 7.5-12.5 dwellings for a suburban and urban extension location.
- The subject site is not considered 'accessible' and is therefore not eligible for densities up to 80 dph or 20 houses. While 12.5 dwellings could be built on the subject site, the landowner has made it clear they have no intention of developing the area in the immediate future
- As such, zoning this site Proposed Residential A is inefficient for the development of Monaghan Town, as this zoning could be applied to another site which is better suited to development and has a landowner with intentions to build.

Conclusion

- In summary, this submission requests that Monaghan County Council consider the following:
That the section of the submission lands zoned Proposed Residential A under the Monaghan County Development Plan 2025-2031 be rezoned Strategic Residential Reserve
- The landholding to which this report pertains is located on the outskirts of Monaghan Town, the strategically located and serviced county town of Monaghan
- The site is unsuitable for development as the accessway to the site is too narrow to service the proposed density of development and it would disturb the existing commercial activity on the site
- While the site is surrounded by low density residential housing, the landowner has no intention to develop in the immediate future and therefore the zoning of Proposed Residential A would be better applied elsewhere in Monaghan
- The Draft Monaghan County Development Plan 2025-2031 has remained unchanged from the existing zoning of Proposed Residential A and Existing Commercial
- The submission lands are better suited for Strategic Residential Reserve zoning given the location of the land on the outskirts of Monaghan Town and given the availability of land in more suitable areas throughout the town
- It is strongly recommended the southern end of the submission lands be zoned Strategic Residential Reserve as the landowner has no intention to develop this land in the immediate future.

Chief Executive Response

The submission requests a partial rezone the subject lands from the existing 'Proposed Residential A' to 'Strategic Residential Reserve'.

The submission lands are located at Cootehill/Ballybay Road, Monaghan Town, approximately 1km south of Monaghan Town. Fitness Habit, a commercial gym is operating on the northern section of the subject lands. The adjoining lands to the south-east comprise a Church and associated grounds and are at risk of flooding, referenced as MTFRA 38 in the Strategic Infrastructure Assessment.

The subject lands are within the Settlement Envelope, are Tier 1 'Serviced Zoned Land' and are zoned Proposed Residential A in the Draft Plan.

The Core Strategy of the Development Plan recognises the role of settlements in driving the development of the County and identifies the scope of development possible for the County, while remaining consistent with National and Regional policy. It also identifies the quantum and location of development for the plan period, consistent with the population targets and settlement hierarchy that reflects the availability of existing services, planned investment, sequential development and environmental requirements.

The request to rezone part of lands from 'Proposed Residential A' to 'Strategic Residential Reserve' is acknowledged; however, to facilitate the expansion of the existing on site commercial enterprise, it is considered more appropriate to rezone these lands as 'Existing Commercial'.

Chief Executive Recommendation

Rezone part of lands from 'Proposed Residential A' to 'Existing Commercial'.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-95</u>	Colm Herron c/o Hughes Planning & Development Consultant	Lands at Drumbear, Monaghan Town	24

Summary of Submission & Issues Raised

The submission requests the rezoning of lands from Strategic Residential Reserve to Proposed Residential B.

Introduction

In summary, this submission requests that Monaghan County Council consider the following:

- *That the submission lands currently zoned Strategic Residential Reserve and Proposed Residential B in the Draft Monaghan County Development Plan 2025-2031 be rezoned Proposed Residential B (in accordance with current zoning).*

- The landholding to which this report pertains is located within the townland of Drumbear, in County Monaghan. Drumbear is a well-established residential area, in proximity to the Monaghan Town Centre, which lies only 1.8km to its south. It benefits from easy access on to Cootehill Road (R162 Regional Road) which connects to the N54 National Road.
- The current draft plan proposes to re-zone the lands to Strategic Residential Reserve.
- It is considered appropriate and in accordance with the principles of proper planning and sustainable development to retain the existing Proposed Residential B zoning designation pertaining to the lands. The lands are ideally suited for residential development noting they are serviced lands in proximity to Monaghan, well connected, easily accessible and well serviced with infrastructure, facilities, amenities.
- Indeed, our client is currently in the final stages of the submission of a planning application for 37 no. residential dwellings in accordance with the current residential zoning pertaining to the lands.

Comparison of Recent, Draft and Suggested Zoning Maps

- It is noted that part of the subject lands has been dezoned from the existing zoning of Proposed Residential B to Strategic Residential Reserve while the other portion of the subject lands retains its existing zoning designation of Proposed Residential B.
- It is important to note that this submission report pertains to two separate sites; Site 1 and Site 2 with one site being dezoned and the other site retaining its original zoning
- The subject lands are located at the threshold of Monaghan Town, in close proximity to the centre. Monaghan Town is the county town of County Monaghan, a border county with Northern Ireland, and the largest town within Monaghan with a population of c. 8,000.
- The subject lands are located within an existing residential area of Monaghan Town, that is well-connected, easily accessible and well-serviced with infrastructure, facilities and amenities
- The lands are surrounded by existing residential neighbourhoods, and so, the zoning of this land for residential use would support the sustainable development and consolidation of Monaghan Town Centre/Environs.
- By retaining the use of this land under 'Proposed Residential B', it can provide for much-needed housing, with ample amenities nearby, enhancing the area of the Drumbear Townland, and Monaghan Town.
- This is evidenced in the forthcoming planning application for 37 no. residential units which will be submitted to the Council for consideration in the coming weeks. The planning application

demonstrates that a high-quality residential development can be imminently achieved on the lands and supports the retention of the lands as residential zoned B lands.

Submission Lands

- The land subject to this submission comprises two distinct sites: **Site No. 1** and **Site No. 2**.
- Site No.1 covers an area of approximately 0.8 hectares, while Site No. 2 extends to approximately 0.31 hectares and benefits from considerable road frontage, presenting c. 47m of same along its eastern boundary adjacent to the R188 (Monaghan to Cootehill) regional road
- Site No. 1 is bound to the north by existing brownfield lands and, in part, by an established residential neighbourhood. To the west and south, it is surrounded by additional residential developments. A single dwelling lies between Site No. 1 and Site No. 2.
- Site No. 2 is bounded to the south by greenfield land, which is in the ownership of our client and currently zoned Existing Residential, and to the north by detached residential properties.
- The site is located approximately 2km from Monaghan town centre, which offers a variety of shops, amenities, and facilities. In closer proximity, the immediate area also features a fitness centre with a martial arts school, and a physiotherapy clinic as well as a nearby church.
- Given the site's prominent location close to the town centre and on a strategic transport route between the peripheral lands and the Town Centre, it is considered that the proposed zoning of Strategic Residential Reserve is an underutilisation of a serviced site within an established residential area.
- The maximisation of this land for residential use would provide for much-needed residential accommodation, within a close distance of Monaghan town centre, with ample amenities nearby.
- It is emphasised that the subject lands are zoned part Proposed Residential B under the existing Monaghan County Development Plan 2019-2025, thus residential use on this land is considered acceptable by the Council.
- The immediate area surrounding the site is characterised by low-density residential housing with established developments of detached and semi-detached dwelling units to the east, west and south of the subject lands.
- The surrounding area is well-served by public transport, primarily by bus. The nearest bus stop to Site No. 2 is approximately 550 meters from the eastern boundary, providing convenient ingress and egress for town access. Key services include the MN2 route from Castleblayney to Monaghan Town Centre, which passes through Drumbear. In addition, TFI Local Link operates the MN1 route within Monaghan Town, enhancing connectivity to local amenities and providing transfer options for broader regional travel.
- Monaghan also benefits from a number of inter-county connections. Bus Éireann operates Route 175, which links Monaghan to Cavan via Cootehill, and Route 162, which connects Monaghan with Dundalk. Route 182 extends from Drogheda to Monaghan, while Route 32 provides service from Monaghan to Letterkenny via Dublin Airport, facilitating long-distance travel and access to key transit hubs.
- Complementing these public options, McConnon Travel, a private service, offers daily routes between Monaghan and Dublin. This service caters to general passengers and students alike, with stops at major Dublin colleges and hospitals, including University College Dublin (UCD). Additionally, through partnership with Transport for Ireland, McConnon Travel provides discounted fares via the TFI GO app, making the route both accessible and economical. The subject site is also located c. 8-minute drive from Monaghan Town Centre
- The rezoning of the submission lands to retain the Residential B land use zoning will provide consolidation of the lands that are situated in a prime location proximate to Monaghan town centre. As detailed in the above Figures, the submission lands are surrounded by primarily residentially zoned lands, featuring established low-density housing.

- As previously noted, our client is intending to submit an application for a residential development of 37 no. units in accordance with the surrounding pattern of development and the existing amenities, services and infrastructure which supports the Residential B zoning pertaining to the site. Therefore, it is requested that the Residential B zoning designation is retained for these lands.
- Furthermore, designating these lands as a Strategic Residential Reserve, aimed at protecting them for future residential use, is unnecessary. The area is already well-served, with access to key amenities, reliable bus connections, and proximity to the town centre. Immediate residential development on the submission lands would support the consolidated growth of the area, enhancing Monaghan's capacity to accommodate residential demand effectively without deferring development in a well-connected and serviced location.

Planning Application on the Subject Lands

- McGuigan Architects is actively preparing a planning application for lands at Drumbear, with the intention of submitting the application by the end of 2024. The presence of a live planning application during the preparation phase of the County Development Plan provides a compelling planning rationale for retaining its zoning designation of Proposed Residential B.
- The proposed development consists of a total of 37 no. residential units, designed to integrate with the existing landscape and surrounding residential area. The proposed density is approximately 17 no. units per hectare, carefully calibrated to align with the site's topography and to protect the amenity of neighbouring properties. The development comprises detached and semi-detached dwellings around a central loop road, providing easy access for residents. Key access to the development is proposed from Cootehill Road, ensuring convenient connectivity to the wider Monaghan area. In addition, the design incorporates dedicated open green space along the western side of the site, which offers recreational space for residents.
- The planning application demonstrates the appropriateness of zoning the lands for Residential B to provide much needed housing delivered in a timely manner. The rezoning of the lands to Strategic Residential Reserve will prohibit the delivery of essential housing during a housing crisis. The lodgement of a planning application demonstrates a commitment to deliver 37 no. houses to serve Monaghan within the lifetime of the current and draft plan.

Planning Context of the subject land

MCDP 2019-2025

- The Monaghan County Development Plan 2019-2025 identified three primary land use zoning objectives with regards to the delivery of future residential development
- It is noted, having regard to the variations to the Monaghan County Development Plan 2019-2025 which have occurred in the interim period following the adaptation of this plan, that almost 25 hectares (24.84) of lands subject to the Strategic Residential Reserve within Monaghan Town have since been de-zoned thus limiting the extent of land suitable for residential development within the town.
- With regards to the subject lands, we note that under the provisions of the current Monaghan County Development Plan 2019-2025, the lands are zoned Proposed Residential B.
- As part of the Draft Plan, Site no. 1 of the subject lands has been downgraded from Proposed Residential B to Strategic Residential Reserve zoning. This downgrade represents a shift away from providing immediate housing solutions, as it limits development until 75% of other residential lands have been developed. Indeed the re-zoning is contrary to the intention of our client to submit an application on the lands for residential development and does not reflect the optimal use of the land, particularly given the current housing crisis as well as the site's location and its alignment with the wider goals of the Monaghan County Development Plan. As the plan states, Strategic Residential Reserve lands are intended:
'To protect lands that are considered strategic in location for future residential development.'

However, the development of these lands *'will only be permitted in instances whereby 75% of the proposed residential lands have been developed.'*

- This creates unnecessary delays in addressing current residential needs and fails to recognise the potential of the land for immediate development.
- The proposal to retain the current zoning of Proposed Residential B is a more appropriate use of the land, enabling more immediate residential development. This rezoning would better serve the current and future housing needs of the area, aligning with the plan's overarching goal to *'provide for the appropriate use of land which protects the amenity of the town's function whilst providing for current and future development demand.'*

Draft MCDP 2025-2031

- Under the Draft Monaghan County Development Plan 2025-2031, Site no. 1 of the submission lands has been rezoned Strategic Residential Reserve while Site no. 2 retains its existing zoning designation of Proposed Residential B
- Monaghan Town is designated as the only Tier 1 'Principal / Key Town' within Monaghan in the Draft Monaghan County Development Plan 2025-2031
- It is considered that the submission lands provide ample opportunity space to create a high-quality residential development in line with the above Strategic Goal. The submission lands of Site No. 1 extends to 0.8 hectares and Site No.2 extends to 0.31 hectares, which is considered spacious and adequate to provide a residential scheme of mixed unit typology with high-quality open space.
- It is of note that the land uses listed above for both Strategic Residential Reserve and Proposed Residential B applied to the sites as per the draft plan restrain the site from contributing to the consolidation of residential development in Monaghan Town. It is considered that the draft land use zoning objective for the submission lands is considered premature and restrictive.
- We ask the Council to rezone the subject lands to Residential B in order to support the growing populations of Monaghan Town, and Ireland as a whole, in line with the sustainable development and planning of the area.
- The subject lands are located within a Tier 1 area of the settlement boundary, making them ideally suited for development. Site Map References MT19 to the north and MT15 to the south of the subject site, have been rezoned as Proposed Residential B under the Draft Monaghan County Development Plan. Additionally, to the east, MT19, is proposed to be zoned as Proposed Residential A. These surrounding sites, which lie approximately 2km from the town centre, have been recognised as having strong potential for compact growth.
- Given the comparable Tier 1 zoning of the subject lands, it is clear that Proposed Residential B zoning would be appropriate, aligning with the surrounding sites of MT14, MT15, and MT19 sites. Additionally, the subject lands, being greenfield, present further development potential and are well-supported by essential infrastructure, including road and pedestrian access from Cootehill Road (R188 regional road). In line with the infrastructure standards applied in the area, the subject lands meet key assessment criteria in terms of road infrastructure, footpaths, public lighting, surface water drainage, wastewater, and water supply—services deemed adequate in the adjacent Proposed Residential B zoned sites MT15 and MT19.

Submission Request

In summary, this submission requests that Monaghan County Council considers the following:

- *That the submission lands zoned Strategic Residential Reserve and Proposed Residential B under the Draft Monaghan County Development Plan 2025-2031 be rezoned Proposed Residential (in accordance with their current zoning designation).*

Development Context

- Site 2 is directly accessible via the R188 (Monaghan to Cootehill) regional road, presenting considerable road frontage of c. 47m along its eastern boundary, and as such, allows for straightforward development access, and can be developed swiftly subject to planning permission being obtained.
- Additionally, the landowner owns adjacent lands to the south, currently zoned for Existing Residential use, which connects both Site 1 and Site 2, creating a cohesive U-shaped configuration, as illustrated in the proposed site layout plan above that our client intends to submit in the coming weeks (Figure 14.0.) This layout allows for access to both sites from the Cootehill Road, consolidating the entry points through the southern portion of the lands and facilitating efficient movement within the development.
- The landowner is eager to develop the site and, subject to the retention of the Residential zoning objective, would be willing to engage with the Planning Authority to prepare plans for future residential development.

Access

- With regards to the accessibility of public transport, it is noted that the subject lands are within c. 550 metres of the nearest bus stop. This stop is served by the MN2 route, which connects the site to Monaghan Town Centre multiple times daily, facilitating easy travel to local amenities.
- In addition, the TFI Local Link's MN1 route operates within Monaghan Town, providing further connectivity within the local area. Approximately 2km from the site, several Bus Éireann intercity routes (nos. 175, 162, 182, and 32) offer extensive regional and national connections. These routes link Monaghan with key destinations such as Dublin, Dublin Airport, Cavan, Dundalk, Drogheda, and Letterkenny, making the site highly accessible for inter-county travel.
- The availability of reliable public transport services within such close proximity to the subject site is seen as the principal factor with regard to its zoning to provide for Proposed Residential B development. The use of the site to accommodate a planned and co-ordinated residential scheme in place of existing agricultural green space will allow for the greater use of existing public transport services and will support the economic growth of these services as well as the growth of Monaghan as a Strategic Growth Settlement Town, in line with regional policies
- The Bus Éireann Expressway Route no. 32 provides service from Monaghan Bus Station to Dublin Airport every two hours, with a total travel time of just 1 hour and 37 minutes, offering a quick and convenient connection to the airport.
- In addition to public transport services, the subject site is situated a 1 hour-42-minute drive from Dublin. There are multiple journey options available including the N1 – M1 – Dublin, or the N2 or N2 – N33 – M1 – Dublin. Moreover, Belfast city is situated a c.1 hour-15-minute drive from Monaghan and is accessible via the N2 – M1.
- Considering the above, it is considered that the submission lands are extremely accessible via public transport and by car, which is favourable for residential development.

Local Services

- Given the location of the subject site c. 2km south of Monaghan Town, rezoning to Proposed Residential A is a strategic and appropriate choice due to the area's proximity to essential amenities, which support a higher-density residential development. Monaghan Town

provides a well-rounded offering of services and community resources that enhance the suitability of Proposed Residential B zoning.

- The town is well-served by educational facilities, with Gaelscoil Ultain and St. Mary's Boys' National School providing primary education, and Monaghan Collegiate School and St. Louis Secondary School nearby for secondary education. Healthcare access is available at Monaghan General Hospital and Monaghan Medical Centre. Recreational facilities include Rossmore Forest Park, Rossmore Golf Club, Coral Leisure Centre, a skateboard park, Monaghan Shopping Centre, and various retail options in the town centre providing a high standard of living for potential residents.
- Given the subject lands location to the town centre and the services available, we request that Monaghan County Council rezone the land in its entirety to Proposed Residential B zoning.
- The development of the subject site presents an opportunity to guide the location of the future population of Monaghan to the centre of the immediate area within close proximity to existing amenities and public transport services.

Infrastructure

- It is submitted that the submission lands are adequately serviced. The site is accessed from R188 Regional Road, at the east boundary of Site No. 2.
- Considering the factors outlined, the submission lands are strategically located and well-serviced making them an ideal fit for the planned residential development envisioned by the Council.

Policy- National Level

Regional Spatial and Economic Strategy for the Northern and Western Region

- The RSES recognises the strategic development potential of Monaghan Town due to the availability of industry, enterprise and employment zoned lands and its proximity to Dublin. With regards to population growth, the RSES identifies that growth within the town is to be targeted at the delivery of compact growth with a mix of housing densities and plot ratios necessary due to the difficult topography of the town.
- As the submission site is located within the centre/environs of Monaghan Town, it is considered that the rezoning of the site to provide residential units is compliant with the Regional Spatial and Economic Strategy for the region as it will be providing much-needed accommodation within an existing built-up area within a Key Town.

Submission Lands

Project Ireland 2040 – National Planning Framework

- It is considered prudent to note and respond to the commentary provided within the guidelines in relation to each of the 10 no. National Strategic Outcomes as follows;

1. Compact Growth

The submission site is located within the centre of Monaghan Town; thus it is located within close proximity to existing transport infrastructure including Bus Eireann bus services. We consider it representative of an appropriate location for residential development and the consolidation of this area. The development of the site allows for increased permeability within the immediate area and for the increased viability of existing local community infrastructure.

2. Enhanced Regional Accessibility

The subject site is located within 2km of Bus Eireann services available via Cootehill Road. As such, it is considered that the subject site is well serviced by public transport offering direct access to larger urban centres at Dublin and Belfast.

3. Strengthened Rural Economies and Communities

The development of the submission site presents a direct opportunity to consolidate development within the centre of Monaghan Town. A significant residential development at this location will result

in the increased viability of commercial services within the immediate area and presents the potential for the further expansion of Monaghan Town.

4. Sustainable Mobility

In compliance with national policy guidance, the co-ordinated development of the submission site would ensure that all built form is constructed to the highest architectural standard and is suitably energy-efficient and equipped for challenges anticipated from a changing climate.

5. A Strong Economy supported by Enterprise, Innovation and Skills

The development of the submission site and associated consolidation of Monaghan Town could result in a heightened extent of commercial development, enterprise and innovation within the town in the future which would diversify and strengthen the local community.

6. High Quality International Activity

Monaghan Town is both strategically located and served by infrastructure so as to represent a unique location for the development of a sustainable urban centre. Whilst the development of this area will have no direct impact on international competitiveness, it is considered that the guided development of Monaghan Town and Monaghan more broadly, presents an opportunity to set an international precedent for sustainable development.

7. Enhanced Amenity and Heritage

The development of the submission site presents a direct opportunity to improve permeability within the immediate area through the improvement of the existing underutilised green fields into residential development with adequate amenity space and open space.

8. Transition to a Low Carbon and Climate Resilient Society

As stated previously, all built forms within the submission site will be suitably energy-efficient and equipped for challenges anticipated from a changing climate.

9. Sustainable Management of Water, Waste and other Environmental Resources

Any development of the submission site would be in line with the principles of Irish Water and the sustainable management and development of the area.

10. Access to Quality Childcare, Education and Health Services

The subject site is situated within proximity to various primary and secondary schools as detailed in Figure 27.0 of this report. Furthermore, with regard to local amenities, it is noted there are a range of local shops, restaurants, public houses and services available in the town. The further development of the area and associated increase in population growth is considered necessary to provide an economic justification for the provision of improved recreational and educational services with the provision of shopping facilities generally calculated on the extent of the local population available to avail of such services.

It is thus submitted that the subject site, which would be considered an underutilised agricultural site, would be best utilised by residential development and would therefore be consistent with the provisions of the National Planning Framework.

National Planning Framework Review

- The draft revision notably reaffirms the focus on renewing and developing existing settlements as established under the NPF 2018, rather than allowing the continual expansion and sprawl of cities and towns out into the countryside, at the expense of town centres and smaller villages. The target is for at least 40% of all new housing to be delivered within the existing built-up areas of cities, towns and villages on infill and/or brownfield sites. The rest of our homes will continue to be delivered at the edge of settlements and in rural areas.
- With regards to key changes between the NPF 2018 and the draft revision, it is noted that number of houses required per annum has increased from between 30-35,000 per annum to a total of 50,000. Whilst this change is considered to reflect the ongoing housing crisis within the country it is noted that the document makes no specific reference to changing household sizes or increased demand for housing.

- The draft revision also places greater emphasis on land activation and active land management to ensure transport orientated development (TOD) opportunities are realised at greenfield and brownfield sites adjacent to public transport hubs. The revision makes reference to the creation of measures such as the Residential Zoned Land Tax and Land Value Sharing with the purpose of such tools being to better manage the supply of development land, to meet housing land requirements, ease pressure on building land and housing costs and to capture gains in land value from the development process for investment in necessary public infrastructure.

Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024)

- It is considered that the subject site is appropriately located so as to accommodate a residential development of appropriate density within the centre of Monaghan in close proximity to existing public transport services and amenities.
- The design of any future development can respond to the topography of the area and the nature of the existing built form so as to limit any impacts on existing amenities.
- The site is located within the centre of the immediate area and presents a direct opportunity to consolidate and guide the future growth of the area in a manner that limits the need for unsustainable commuting patterns and improves the sense of community and safety within the wider area.
- The development of the site is thus considered to be appropriate in the context of the Urban Development and Building Heights - Guidelines for Planning Authorities, December 2018.

Quality Housing for Sustainable Communities- Guidelines for Planning Authorities

- The subject site is located on the periphery of the centre of Monaghan Town and is situated within 2km of existing Bus Eireann services in the town.
- Residential development on the subject site would allow for the greater utilisation of these existing services and would allow for the formation of a strong community within the centre of Monaghan Town in accordance with the provisions of the Quality Housing for Sustainable Communities – Guidelines for Planning Authorities (2007).

Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024)

- With the subject site being located in Monaghan Town, this means it can be described under the 'Key Towns and Large Towns (5,000+ population)'. The key priorities for such towns, in order of priority, are to:
 - a) plan for an integrated and connected settlement overall, avoiding the displacement of development generated by economic drivers in the Key Town or Large Town to smaller towns and villages and rural areas in the hinterland,*
 - (b) strengthen town centres,*
 - (c) protect, restore and enhance historic fabric, character, amenity, natural heritage, biodiversity and environmental quality,*
 - (d) realise opportunities for adaptation and reuse of existing buildings and for incremental backland, brownfield and infill development, and*
 - (e) deliver sequential and sustainable urban extension at locations that are closest to the urban core and are integrated into, or can be integrated into, the existing built up footprint of the settlement.*
- Compact growth has been recognised as key to the renewal of existing settlements, with an overall goal to reduce continued sprawl. The subject guidelines recognise the benefit of consolidation which improves access to services, ensures efficient use of land and allows for greater integration with existing infrastructure and public transport. It is accepted that

compact growth is essential, particularly along transport corridors that support the more efficient use of energy and contribute to the achievement of net zero carbon emissions and other climate action targets by 2050.

- As a final point, it is considered that the location of the subject site is representative of 'Key Town / Large Town - Suburban/Urban Extension' as defined under Table 3.5 'Areas and Density Ranges Key Towns and Large Towns (5,000 population)' of the subject guidelines. In this regard we would note the following commentary as it relates to the appropriate density range for development at such locations:

'Suburban areas are the low density car-orientated residential areas constructed at the edge of the town, while urban extension refers to greenfield lands at the edge of the existing built-up footprint area that are zoned for residential or mixed-use (including residential) development. It is a policy and objective of these Guidelines that residential densities in the range 30 dph to 50 dph (net) shall generally be applied at suburban and urban extension locations of Key Towns and Large Towns, and that densities of up to 80 dph (net) shall be open for consideration at 'accessible' suburban / urban extension locations'

- A residential development upon the subject sites, in compliance with the above density range and considering the lands 'accessibility', would comprise a scheme of between 24-40 no. dwellings for Site No. 1 and 9-16 no. dwellings for Site No. 2.
- The development of the subject site to provide density in line with the guidance provided within the Compact Settlements Guidelines is considered appropriate to ensure the sequential development of Monaghan Town and the appropriate consolidation of the towns development boundary.

Conclusion

This submission is prepared in response to the Draft Monaghan County Development Plan 2025-2031 which has been prepared in replace of the existing Monaghan County Development Plan 2019-2025. In summary, this submission requests that Monaghan County Council consider the following:

- *That the submission lands zoned Proposed Residential B and Strategic Residential Reserve under the Draft Monaghan County Development Plan 2025-2031 be rezoned Proposed Residential B (maintaining their current zoning designation.)*

- the landholding to which this report pertains is located within the centre of Monaghan Town, the strategically located and serviced county town of Monaghan.
- The town is serviced by multiple public transport including Bus Éireann which provides frequent and reliable high-capacity service to Dublin City Centre and other employment across Ireland. The site is surrounded by low-density housing and would be suited for higher-density housing as envisioned under proposed Residential B zoning objective to consolidate the area and support the growth of Monaghan town centre.
- McGuigan Architects is actively preparing a planning application for the subject lands with the intention of submitting the application by the end of 2024. The presence of a live planning application during the preparation phase of the County Development Plan provides a compelling planning rationale for retaining the Residential B zoning designation.
- The Draft Monaghan County Development Plan 2025-2031 has dezoned part of the site (Site No. 1) from Proposed Residential B to Strategic Residential Reserve while Site No.2 remained unchanged from the existing Proposed Residential B Zoning.
- The submission lands are better suited for Residential land use zoning given the location of the land within an existing residential area in the centre of Monaghan Town and given the increase in population across the country. It is strongly recommended the submission lands in their entirety be zoned Proposed Residential B as they are ideally located within the centre of Monaghan Town, close to services, amenities, public transport, and residential development

on this land would further support the growing population of Monaghan Town and County Monaghan as a whole.

Chief Executive Response

The submission requests the rezoning of lands from Strategic Residential Reserve to Proposed Residential B.

This submission relates to two separate sites in Drumbear, Monaghan Town, approximately 1.8km to the south of Monaghan Town Centre. Drumbear is a well-established residential area with access on to Cootehill Road (R162 Regional Road) which connects to the N54 National Road.

Site No.1 is approximately 0.8 hectares, is bound to the north by existing brownfield lands and, in part, by an established residential neighbourhood. To the west and south, it is surrounded by additional residential developments. A single dwelling lies between Site No. 1 and Site No. 2. Site No. 1 of the submission lands is zoned as 'Strategic Residential Reserve' in the Draft Development Plan.

Site No. 2 is approximately 0.31 hectares and benefits from c47m of road frontage along its eastern boundary adjacent to the R188 (Monaghan to Cootehill) regional road. It is bounded to the south by greenfield land and one residential property, and to the north by detached residential properties. Site No. 2 is zoned Proposed Residential B in the Draft Development Plan.

A planning application has been submitted on Sites No 1 and No2, under Plan Ref No 24/60478 for 37no. residential dwellings, open space, vehicular and pedestrian access onto Cootehill Road.

The OPR submission recommended that these lands be reviewed and to rezone the lands for an appropriate land use where they do not support long term compact growth and / or do not follow a sequential approach to the zoning of lands and / or are in an area subject to flooding.

The Core Strategy of the Development Plan recognises the role of settlements in driving the development of the County and identifies the scope of development possible for the County, while remaining consistent with National and Regional policy. It also identifies the quantum and location of development for the plan period, consistent with the population targets and settlement hierarchy that reflects the availability of existing services, planned investment, sequential development and environmental requirements.

Whilst it is acknowledged that these Tier 1 lands have services available to them, the subject lands are located 1.8km south of the town centre. Site No2 has good road frontage and direct access onto the Cootehill Road and are more sequentially appropriate for residential development to meet the projected population increase over the plan period; on this basis, and to ensure compact growth of Monaghan Town, Site No2 lands are most appropriately zoned Proposed Residential B.

Site No1 lands do not have direct access onto the Cootehill Road and are less favourable from a sequential approach to the zoning of residential land, therefore, it is recommended that Site No1 lands be zoned as 'Strategic Residential Reserve'.

Chief Executive Recommendation

No amendment recommended.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-97</u>	Colm Herron c/o Hughes Planning and Development Consultant	Lands at Annahagh Lane, Monaghan Town	25

Summary of Submission & Issues Raised

The submission the rezoning of lands from Strategic Residential Reserve to Residential A and from Community Services/Facilities to Residential A.

Introduction

In summary, this submission requests that Monaghan County Council consider the following:

- *That the submission lands zoned Strategic Residential Reserve under the Draft Monaghan County Development Plan 2025-2031 be rezoned Proposed Residential A.*

And;

- *That the submission lands zoned Community Services/Facilities under the Draft Monaghan County Development Plan 2025-2031 be rezoned Proposed Residential A.*

- The landholding to which this report pertains is located within the townland of Annahagh, in County Monaghan.
- It is considered appropriate to rezone the submission lands from the existing Strategic Residential Reserve to Proposed Residential A zoning and to rezone the lands zoned Community Services/Facilities under the draft plan to Proposed Residential A noting the fact that the lands are accessible and serviced lands within proximity to Monaghan.

Comparison of Recent, Draft and Suggested Zoning Maps

- It is noted that the subject lands within the entirety of the site boundary have remained unchanged from the existing zoning of Strategic Residential Reserve and Community Services.
- The subject lands are located within an existing residential area of Monaghan Town, that is well-connected, easily accessible and well-serviced with infrastructure, facilities and amenities
- The lands are surrounded by existing residential neighbourhoods, and so, the zoning of this land for residential use would support the sustainable development and consolidation of Monaghan Town Centre, thus the lands are readily available for development.
- The land is currently underutilised as green space; however, our client expresses great interest in developing these lands for residential use. The site is situated c. 1.1km from Monaghan town centre, which has an array of local shops, restaurants, pubs and grocery stores within walking distance, ideal for residential development.
- The purposed use of this land for Proposed Residential A would provide for much-needed residential accommodation, with ample amenities nearby. Our client wishes to enhance the existing area of Annahagh and provide much-needed residential accommodation.
- It is emphasised that our client's lands are zoned Strategic Residential Reserve and Community Services under the existing Monaghan County Development Plan 2019-2025, thus residential use on this land is currently considered acceptable by the Council. We respectfully ask that Monaghan County Council consider this submission and rezone the entirety of the lands to Proposed Residential A.

Submission Lands

- The client's landholding covers approximately 3.36 hectares, with significant road frontage of about 212m along its western boundary on Black Lane.

- The lands currently hold two zoning designations: Strategic Residential Reserve and Community Services and Facilities.
- This submission pertains to the eastern portion of the lands, which is designated as Strategic Residential Reserve and spans roughly 1.69 hectares.
- The portion of the site currently zoned for Community Facilities is also proposed to be rezoned to Proposed Residential A.
- The subject site is bordered by a mix of land uses: to the north, it is partially adjoined by greenfield areas and existing residential developments; to the west, it is adjacent to the Monaghan Waste Water Treatment Plan; and to the east, it is bounded by established residential properties.
- The landowner also retains control over a strip of land along the Hillgrove Hotel Car park which could facilitate footpath and widened access to the submission lands.
- The site is c. 1km from Monaghan town centre which has an array of local shops, amenities and facilities.
- Moreover, directly to the south of the site is Hillgrove Hotel Leisure and Spa, which offers a fitness club, spa facilities, and dining options to both guests and non-guests alike.
- It is highlighted there are lands to south of the subject lands zoned for Proposed Residential A in the Draft Monaghan County Development Plan 2025-2031. We would argue our submission lands are of appropriate scale and location to accommodate adequate residential development which could further enhance this Proposed Residential A land use zoning nearby.
- The immediate area surrounding the site is characterised by predominantly low-density residential housing with adjacent properties located along Annahagh Lane.
- The location benefits from several nearby outdoor amenities, including the Ulster Canal Greenway, which provides a scenic walkway connecting to the town centre. Additional local facilities include the Monaghan Harps GAA Club and the Monaghan Town Scout Hall, further enhancing the area's appeal for recreation and community engagement.
- The area is well serviced by public transport with the nearest bus stop approximately 650 meters from the site's western boundary. This stop is served by route MN1, which connects the area with Monaghan's central Bus Station.
- Monaghan Bus Station, the main transit hub, offers a variety of inter-county routes. Key services include Bus Éireann Route 175, linking Monaghan to Cavan via Cootehill; Route 162, connecting Monaghan with Dundalk; Route 182, extending from Drogheda to Monaghan; and Route 32, which travels from Monaghan to Letterkenny via Dublin Airport.
- The rezoning of the submission lands to Proposed Residential A will provide consolidation of the lands that are situated in a prime location proximate to Monaghan town centre. Designating these lands as a Strategic Residential Reserve, aimed at protecting them for future residential use, is unnecessary.
- The area is already well-serviced, with access to key amenities, reliable bus connections, and proximity to the town centre.
- Immediate residential development on the submission lands would support the consolidated growth of the area, enhancing Monaghan's capacity to accommodate residential demand effectively without deferring development in a well-connected and serviced location.
- Substantial areas of land to the south and southeast have been designated as Proposed Residential A in the draft zoning plan, despite being located further from Monaghan town centre than the subject lands.
- The subject lands are ideally positioned, with closer proximity to the town centre and access to the Ulster Canal Greenway, which runs adjacent to the site and provides a safe, convenient pedestrian route into the town

- This strategic location would not only support residential use but also promote sustainable travel options, aligning with Monaghan County’s objectives for walkable, accessible communities.
- Furthermore, there is a noticeable scarcity of residentially zoned land in this area, despite high demand for new housing close to Monaghan’s amenities
- Rezoning the subject lands to Proposed Residential A would address this need by providing an appropriate, well-serviced site for future housing, while taking advantage of existing infrastructure and reducing urban sprawl
- Given the site’s locational advantages and the clear demand for residential land in the area, we respectfully submit that it would be a logical and beneficial addition to Monaghan’s Proposed Residential zoning designations.

Planning Context of the subject land

MCDP 2019-2025

- The Monaghan County Development Plan 2019-2025 identified three primary land use zoning objectives with regards to the delivery of future residential development
- It is noted, having regard to the variations to the Monaghan County Development Plan 2019-2025 which have occurred in the interim period following the adaptation of this plan, that almost 25 hectares (24.84) of lands subject to the Strategic Residential Reserve within Monaghan Town have since been de-zoned thus limiting the extent of land suitable for residential development within the town
- With regards to the subject lands, we note that under the provisions of the Monaghan County Development Plan 2019-2025, the lands are zoned Strategic Residential Reserve and community services/facilities.

Draft MCDP 2025-2031

- Under the Draft Monaghan County Development Plan 2025-2031, the submission site remains unchanged having been zoned Strategic Residential Reserve
- It is of note that the land uses listed above for Strategic Residential Reserve applied to the site as per the draft plan restrain the site from contributing to the consolidation of residential development in Monaghan Town
- It is considered that the draft land use zoning objective for the submission lands is considered premature and restrictive.
- Request the Council to rezone the subject lands to Proposed Residential A in order to support the growing populations of Monaghan Town, and Ireland as a whole, in line with the sustainable development and planning of the area.
- The subject lands, located within the built-up area of Monaghan, meet nearly all Tier 1 assessment criteria for development readiness. Adjacent to established Tier 1 zones, Map References MT7 and MT9, with access to essential infrastructure such as roadways, water supply, wastewater systems, and surface water drainage, these lands align closely with the infrastructure standards expected in a Tier 1 designation.
- It is noted that the Settlement Capacity Audit included in the Draft Monaghan County Development Plan states that the Ulster Canal Greenway provides safe, well-lit pedestrian access to the town centre, enhancing connectivity without reliance on main roadways. This secure pedestrian route, located to the immediate west of the subject lands, and could compensate for any on-site gaps, aligning the site with the infrastructure expectations upheld in adjacent Proposed Residential A zones, MT7 and MT9.
- Proximity to Monaghan’s Town Centre further underscores the site’s suitability for a Tier 1 designation. Positioned approximately a 14-minute walk from the town centre, the subject lands fall within the recommended 10–15-minute pedestrian range expected for Tier 1

locations. This proximity allows future residents convenient access to Monaghan's urban amenities and services, promoting compact growth and active travel.

- In terms of scale, accessibility, and infrastructure, the subject lands are on par with or exceed the attributes of other Tier 1-zoned areas, such as MT7 and MT9. Both sites were recognised for Proposed Residential A zoning in the Draft Monaghan County Development Plan, despite being located around 2 km or a 25-minute walk from the town centre. Given the subject site's more central location, superior greenway access, and development capacity as a greenfield site, applying a Proposed Residential A zoning designation would be consistent with the objectives for sustainable and compact urban expansion in Monaghan.

Submission Request

In summary, this submission requests that Monaghan County Council considers the following:

- *That the submission lands zoned Strategic Residential Reserve under the Monaghan County Development Plan 2025-2031 be rezoned Proposed Residential A.*

And;

- *That the submission lands zoned Community Services/Facilities under the Draft Monaghan County Development Plan 2025-2031 be rezoned Proposed Residential A.*

- The preceding sections of this report detail accessibility, services, location, and amenities afforded to the submission lands to justify their use as residential. It is also important to note that our client retains control over a strip of the Hillgrove Hotel car park which will facilitate the widening of the narrow access to the site. This will provide a safe road access as well as a footpath to the submission lands.
- The rezoning of the submission lands to Proposed Residential A will provide consolidation of the lands that are situated in a prime location proximate to Monaghan town centre. Designating these lands as a Strategic Residential Reserve, aimed at protecting them for future residential use, is unnecessary whilst the retention of the Community Services/Facilities zoning designation represents a missed opportunity to enable the delivery of housing on a prime site in Monaghan.
- The area is already well-served, with access to key amenities, reliable bus connections, and proximity to the town centre. Immediate residential development on the submission lands would support the consolidated growth of the area, enhancing Monaghan's capacity to accommodate residential demand effectively without deferring development in a well-connected and serviced location.

Development Context

- The subject lands benefit from direct accessibility via Annahagh Lane, with a lane between adjacent residential dwellings providing a generous access width of approximately 9.1 meters.
- This access point, combined with the subject site's favourable topography, enables a straightforward, efficient approach to site development.
- Furthermore, we note that access is also accessible from the south via the existing hotel.
- Such a configuration not only facilitates ease of entry and exit for future residents but also minimises potential disruptions to the established residential area, ensuring a smooth transition from planning to construction, contingent on securing planning approval.
- The landowner is eager to develop the site and, subject to securing the proposed Residential A zoning objective, would be willing to engage with the Planning Authority to prepare plans for future residential development.

Access

- With regards to the accessibility of public transport, it is noted that the subject lands are within c. 650 metres of the nearest bus stop. This stop is served by the MN1 route, which

connects the site to Monaghan Town Centre multiple times daily, facilitating easy travel to local amenities.

- In addition, several Bus Éireann intercity routes (nos. 175, 162, 182, and 32) offer extensive regional and national connections. These routes link Monaghan with key destinations such as Dublin, Dublin Airport, Cavan, Dundalk, Drogheda, and Letterkenny, making the site highly accessible for inter-county travel.
- The lands are located to the north of the existing Hillgrove hotel and our client retains control over a strip of the Hillgrove Hotel car park which will facilitate the widening of the narrow access to the site. This will provide a safe road access as well as a footpath to the submission lands.
- Additionally, the Ulster Canal Greenway (highlighted in green below), adjacent to the subject lands, provides a direct, pedestrian-friendly connection to the Monaghan town centre.
- The availability of reliable public transport services within such close proximity to the subject site is seen as the principal factor with regard to its zoning to provide for Proposed Residential A development. The use of the site to accommodate a planned and co-ordinated residential scheme in place of existing agricultural green space will allow for the greater use of existing public transport services and will support the economic growth of these services as well as the growth of Monaghan as a Strategic Growth Settlement Town, in line with regional policies.
- The Bus Éireann Expressway Route no. 32 provides service from Monaghan Bus Station to Dublin Airport every two hours, with a total travel time of just 1 hour and 37 minutes, offering a quick and convenient connection to the airport.
- In addition to public transport services, the subject site is situated a 1 hour-42-minute drive from Dublin. There are multiple journey options available including the N1 – M1 – Dublin, or the N2 or N2 – N33 – M1 – Dublin. Moreover, Belfast city is situated a c.1 hour-15-minute drive from Monaghan and is accessible via the N2 – M1.
- Considering the above, it is considered that the submission lands are extremely accessible via public transport and by car, which is favourable for residential development.

Local Services

- Given the location of the subject site c. 1km outside of Monaghan Town, rezoning to Proposed Residential A is a strategic and appropriate choice due to the area's proximity to essential amenities, which support a higher-density residential development.
- Monaghan Town provides a well-rounded offering of services and community resources that enhance the suitability of Proposed Residential A zoning.
- The town is well-served by educational facilities, with Gaelscoil Ultain and St. Mary's Boys' National School providing primary education, and Monaghan Collegiate School and St. Louis Secondary School nearby for secondary education.
- Healthcare access is available at Monaghan General Hospital and Monaghan Medical Centre. Recreational facilities include Rossmore Forest Park, Rossmore Golf Club, Coral Leisure Centre, a skateboard park, Monaghan Shopping Centre, providing a high standard of living for potential residents. Further to this, the Ulster Canal runs through the town, as well as the Ulster Canal Greenway adjacent to the subject site.
- Given the subject lands location to the town centre and the services available, we request that Monaghan County Council rezone the land in its entirety to Proposed Residential A zoning.
- The development of the subject site presents an opportunity to guide the location of the future population of Monaghan to the centre of the immediate area within close proximity to existing amenities and public transport services.

Policy- National Level

Regional Spatial and Economic Strategy for the Northern and Western Region

- The RSES recognises the strategic development potential of Monaghan Town due to the availability of industry, enterprise and employment zoned lands and its proximity to Dublin. With regards to population growth, the RSES identifies that growth within the town is to be targeted at the delivery of compact growth with a mix of housing densities and plot ratios necessary due to the difficult topography of the town.
- As the submission site is located within the centre/environs of Monaghan Town, it is considered that the rezoning of the site to provide residential units is compliant with the Regional Spatial and Economic Strategy for the region as it will be providing much-needed accommodation within an existing built-up area within a Key Town.

Project Ireland 2040 – National Planning Framework

- It is considered prudent to note and respond to the commentary provided within the guidelines in relation to each of the 10 no. National Strategic Outcomes as follows;

1. Compact Growth

The submission site is located within the centre of Monaghan Town; thus it is located within close proximity to existing transport infrastructure including Bus Eireann bus services. We consider it representative of an appropriate location for residential development and the consolidation of this area. The development of the site allows for increased permeability within the immediate area and for the increased viability of existing local community infrastructure.

2. Enhanced Regional Accessibility

The subject site is located within 1.8km of Bus Eireann services available via the Old Armagh Road. As such, it is considered that the subject site is well serviced by public transport offering direct access to larger urban centres at Dublin and Belfast.

3. Strengthened Rural Economies and Communities

The development of the submission site presents a direct opportunity to consolidate development within the centre of Monaghan Town. A significant residential development at this location will result in the increased viability of commercial services within the immediate area and presents the potential for the further expansion of Monaghan Town.

4. Sustainable Mobility

In compliance with national policy guidance, the co-ordinated development of the submission site would ensure that all built form is constructed to the highest architectural standard and is suitably energy-efficient and equipped for challenges anticipated from a changing climate.

5. A Strong Economy supported by Enterprise, Innovation and Skills

The development of the submission site and associated consolidation of Monaghan Town could result in a heightened extent of commercial development, enterprise and innovation within the town in the future which would diversify and strengthen the local community.

6. High Quality International Activity

Monaghan Town is both strategically located and served by infrastructure so as to represent a unique location for the development of a sustainable urban centre. Whilst the development of this area will have no direct impact on international competitiveness, it is considered that the guided development of Monaghan Town and Monaghan more broadly, presents an opportunity to set an international precedent for sustainable development.

7. Enhanced Amenity and Heritage

The development of the submission site presents a direct opportunity to improve permeability within the immediate area through the improvement of the existing underutilised green fields into residential development with adequate amenity space and open space.

8. Transition to a Low Carbon and Climate Resilient Society

As stated previously, all built forms within the submission site will be suitably energy-efficient and equipped for challenges anticipated from a changing climate.

9. Sustainable Management of Water, Waste and other Environmental Resources

Any development of the submission site would be in line with the principles of Irish Water and the sustainable management and development of the area.

10. Access to Quality Childcare, Education and Health Services

The subject site is situated within proximity to various primary and secondary schools as detailed in Figure 27.0 of this report. Furthermore, with regard to local amenities, it is noted there are a range of local shops, restaurants, public houses and services available in the town. The further development of the area and associated increase in population growth is considered necessary to provide an economic justification for the provision of improved recreational and educational services with the provision of shopping facilities generally calculated on the extent of the local population available to avail of such services.

It is thus submitted that the subject site, which would be considered an underutilised agricultural site, would be best utilised by residential development and would therefore be consistent with the provisions of the National Planning Framework.

National Planning Framework Review

- The draft revision notably reaffirms the focus on renewing and developing existing settlements as established under the NPF 2018, rather than allowing the continual expansion and sprawl of cities and towns out into the countryside, at the expense of town centres and smaller villages. The target is for at least 40% of all new housing to be delivered within the existing built-up areas of cities, towns and villages on infill and/or brownfield sites. The rest of our homes will continue to be delivered at the edge of settlements and in rural areas.
- With regards to key changes between the NPF 2018 and the draft revision, it is noted that number of houses required per annum has increased from between 30-35,000 per annum to a total of 50,000. Whilst this change is considered to reflect the ongoing housing crisis within the country it is noted that the document makes no specific reference to changing household sizes or increased demand for housing.
- The draft revision also places greater emphasis on land activation and active land management to ensure transport orientated development (TOD) opportunities are realised at greenfield and brownfield sites adjacent to public transport hubs.
- The revision makes reference to the creation of measures such as the Residential Zoned Land Tax and Land Value Sharing with the purpose of such tools being to better manage the supply of development land, to meet housing land requirements, ease pressure on building land and housing costs and to capture gains in land value from the development process for investment in necessary public infrastructure.

Urban Development and Building Heights- Guidelines for Planning Authorities December 2018

- It is considered that the subject site is appropriately located so as to accommodate a residential development of appropriate density within the centre of Monaghan in close proximity to existing public transport services and amenities.
- The design of any future development can respond to the topography of the area and the nature of the existing built form so as to limit any impacts on existing amenities.
- The site is located within the centre of the immediate area and presents a direct opportunity to consolidate and guide the future growth of the area in a manner that limits the need for unsustainable commuting patterns and improves the sense of community and safety within the wider area.
- The development of the site is thus considered to be appropriate in the context of the Urban Development and Building Heights - Guidelines for Planning Authorities, December 2018.

Quality Housing for Sustainable Communities- Guidelines for Planning Authorities

- The subject site is located just outside Monaghan Town Centre and is situated within 1.8km of existing Bus Eireann services in the town
- Residential development on the subject site would allow for the greater utilisation of these existing services and would allow for the formation of a strong community within the centre of Monaghan Town in accordance with the provisions of the Quality Housing for Sustainable Communities – Guidelines for Planning Authorities (2007).

Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024)

- As of January 2024, the Sustainable Residential Development and Compact Settlements Guidelines or Planning Authorities supersede the Sustainable Residential Development in Urban Areas (2009).
- With an emphasis on sustainable residential development and the formation of compact settlements, the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities establish national planning policy and guidelines pertaining to the planning and development of urban and rural settlements. Under said guidelines, settlement types are categorised on their area types and are allocated a guiding density range. With the subject site being located in Monaghan Town, this means it can be described under the ‘Key Towns and Large Towns (5,000+ population)’. The key priorities for such towns, in order of priority, are to:
 - a) plan for an integrated and connected settlement overall, avoiding the displacement of development generated by economic drivers in the Key Town or Large Town to smaller towns and villages and rural areas in the hinterland,*
 - (b) strengthen town centres,*
 - (c) protect, restore and enhance historic fabric, character, amenity, natural heritage, biodiversity and environmental quality,*
 - (d) realise opportunities for adaptation and reuse of existing buildings and for incremental backland, brownfield and infill development, and*
 - (e) deliver sequential and sustainable urban extension at locations that are closest to the urban core and are integrated into, or can be integrated into, the existing built up footprint of the settlement.*
- Compact growth has been recognised as key to the renewal of existing settlements, with an overall goal to reduce continued sprawl. The subject guidelines recognise the benefit of consolidation which improves access to services, ensures efficient use of land and allows for greater integration with existing infrastructure and public transport. It is accepted that compact growth is essential, particularly along transport corridors that support the more efficient use of energy and contribute to the achievement of net zero carbon emissions and other climate action targets by 2050.
- As a final point, it is considered that the location of the subject site is representative of ‘Key Town / Large Town - Centre and Urban Neighbourhood’ as defined under Table 3.5 ‘Areas and Density Ranges Key Towns and Large Towns (5,000 population)’ of the subject guidelines. In this regard we would note the following commentary as it relates to the appropriate density range for development at such locations:
 - ‘The centre comprises the town centre and the surrounding streets, while urban neighbourhoods consist of the early phases of residential development around the centre that have evolved over time to include a greater range of land uses. It is a policy and objective of these Guidelines that residential densities in the range 40 dph-100 dph (net) shall generally be applied in the centres and urban neighbourhoods.’*
- A residential development upon the subject site in compliance with the above density range would comprise a scheme of between 68-169 dwellings. The development of the subject site

to provide density in line with the guidance provided within the Compact Settlements Guidelines is considered appropriate to ensure the sequential development of Monaghan Town and the appropriate consolidation of the towns development boundary.

Conclusion

In summary, this submission requests that Monaghan County Council consider the following:

- *That the submission lands zoned Strategic Residential Reserve under the Monaghan County Development Plan 2025-2031 be rezoned Proposed Residential A.*

And;

- *That the submission lands zoned Community Services/Facilities under the Draft Monaghan County Development Plan 2025-2031 be rezoned Proposed Residential A.*

- The landholding to which this report pertains is located within the centre of Monaghan Town, the strategically located and serviced county town of Monaghan
- The town is serviced by multiple public transport including Bus Éireann which provides frequent and reliable high-capacity service to Dublin City Centre and other employment across Ireland. The subject site, as a greenfield parcel that is already well-serviced and readily available, is ideally suited for higher-density housing. Such development aligns with the Proposed Residential A zoning objective, aimed at consolidating residential areas and supporting the sustainable growth of Monaghan town centre.
- The Draft Monaghan County Development Plan 2025-2031 has remained unchanged from the existing zoning of Strategic Residential Reserve and Community Services/Facilities. We argue that the submission lands are better suited for Residential land use zoning given the location of the land within an existing residential area in the centre of Monaghan Town and given the increase in population across the country. It is strongly recommended the submission lands be zoned Proposed Residential A as they are ideally located within the centre of Monaghan Town, close to services, amenities, public transport, and residential development on this land would further support the growing population of Monaghan Town and County Monaghan as a whole.

Chief Executive Response

The submission requests the rezoning of lands from Strategic Residential Reserve to Residential A and from Community Services/Facilities to Residential A.

The subject lands comprise c3.36Ha. of greenfield lands that fall steeply from east to west. The lands are located in Annahagh Townland, Monaghan Town, approximately 1.1km from Monaghan town centre. The subject site is bordered by a mix of land uses: to the north, it is partially adjoined by greenfield areas and existing residential developments; to the west, is Monaghan Town Waste Water Treatment Plant; and to the east, it is bounded by established residential properties, with the Hillgrove Hotel located to the south.

It is submitted that the lands are accessible via Black Lane (west), Annahagh Lane (east) or through the Hillgrove Hotel (south). The landowner also retains control over a strip of land along the Hillgrove Hotel Car park which it is contended could facilitate footpath and widened access via Annahagh Lane to the submission lands.

The subject lands are within the Settlement Envelope, are Tier 2 'Serviceable Zoned Land' and currently hold two zoning designations: 'Strategic Residential Reserve' (c1.69Ha.) and 'Community Services and Facilities' in the Draft Plan.

The Core Strategy of the Development Plan recognises the role of settlements in driving the development of the County and identifies the scope of development possible for the County, while

remaining consistent with National and Regional policy. It also identifies the quantum and location of development for the plan period, consistent with the population targets and settlement hierarchy that reflects the availability of existing services, planned investment, sequential development and environmental requirements.

It is requested to rezone all the lands to 'Proposed Residential A'. These are Tier 2 lands and it is considered that they are not sequentially the most appropriate and suitable lands for residential development.

Given the topography, proximity to the waste water treatment plant, access options requiring upgrades, and the lack of some development services, it is considered that the most appropriate land use zoning for these lands is part 'Strategic Residential Reserve' and part 'Community Services/Facilities'.

Chief Executive Recommendation

No amendment recommended.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-104</u>	Monaghan County Board of the GAA c/o Armstrong Fenton Associates	Cornacassa Demense, Monaghan Town.	26

Summary of Submission & Issues Raised

The submission requests the rezoning of lands from ‘Strategic Residential Reserve’ to ‘Proposed Residential A’.

The submission is summarised as follows:

- This submission relates to lands in the townland of Cornacassa Demense, south of Scotstown Road (R186) west of the Knockroe Glen residential estate and north/northwest of the Clones Road (N54), Monaghan Town.
- The submission requests the rezoning of the subject lands to Proposed Residential, as outlined in the map accompanying the submission. The lands are currently zoned Strategic Residential Reserve and measure c.2.5ha.
- The subject site is located west of Monaghan town centre, with direct access onto the Scotstown Road (R186), and is in greenfield use. The subject site abuts existing housing, to the north and east.
- The submission states that Monaghan has been identified as Tier 1 Principal / Key Town in the Core Strategy of the Draft MCDP and is recognized being the largest town in the County, providing “broad range of services across the sectors including employment, education, health, cultural services, community services and entertainment” with reference made to Objective SHO1 of the Draft County Monaghan Development Plan.
- The submission notes that the Core Strategy of the Draft CDP identifies that the current population of Monaghan (as of 2022) is 7,894 persons and is projected to grow by 1,303 additional persons by 2031. The average household size is stated to be 2.74 persons which would equate to an average additional growth of c. 475 no. dwelling units.
- The submission also notes that Table 2.6 “Core Strategy Table 2” identifies that 32.04Ha are required to accommodate 380 new dwellings on greenfield lands. We have examined the lands proposed to be zoned objectives “Proposed Residential - A” and “Proposed Residential - B” in Monaghan and note that such lands that have no extant permission attached to same equate to c. 27Ha which is 5 Ha less than that available to accommodate 380 no. new housing units. The submission refers to the Core Strategy Objectives of CSO 2, CSO 4 and SHO 1.
- The submission notes the reference to NPO 9 of the NPF in the Draft plan and the designation of Monaghan Town as a key town within the RSES, and therefore is identified in the RSES for significant rates of population growth of 30% or more above Census 2016 population levels.
- This means that Monaghan Town should achieve a population of at least 10,000 by 2040. To ensure this target is met Monaghan Town must achieve a population of 9,200 by the end of this development plan period. Monaghan is the primary economic growth town to be promoted for regional enterprise where critical mass is a core objective to justify strategic infrastructure provision. Thus, Monaghan Town is designated as a Tier 1 settlement”.
- The submission notes one of the key aims of the Settlement Hierarchy is to ‘support the strengthening of the town and village network throughout the County, with priority being accorded to Monaghan Town to fulfil its designation as a key town in the RSES and its role as the principal town within the County, whilst targeting growth to supporting urban settlements and enabling the expansion of linkages within the region and nationally’.
- The submission notes the reference in the Northern and Western Regional Assembly, Regional Spatial and Economic Strategy 2020-2032 (NWRA, RSES) which defines Monaghan Town as a

'Key Town'. Key Towns are regionally strategic employment centres of a significant scale that can act as regional drivers that complement and support the higher order urban areas within the settlement hierarchy. The NWRA RSES also notes that Monaghan Town has the potential to accommodate a significant level of growth in population and employment.

- The submission notes that in order to promote growth in the designated settlements of County Monaghan one of the approaches to promote growth in the designated settlements and that the most logical approach to developing the subject site is to zone it for "Proposed Residential" use now rather than strategic land reserve.
- The subject site is a flat, greenfield site, identified as a "Strategic Residential Reserve" which demonstrates that the principle of housing on the subject site is acceptable. Retaining the current proposal on the site would further sterilise the development of the subject site until at least 2031.
- The site is a serviceable site, with direct access onto the Scotstown Road (R186) and is c.1km west of Monaghan Town Centre. The site can be developed for housing in keeping with the established and permitted pattern of development in the environs.
- The submission notes the flood risk area to the east of, and not including the subject site. An examination of the OPW Flood Maps identifies that the subject site can adequately be zoned and developed for new residential development. The wooded, southern part of the site is identified as being within the 1 in 1,000 year storm/flood event area, however, given the wooded status of this part of the site, it is envisaged that this part of the site may remain as such.
- The submission notes that based on the figures set out in the Core Strategy of the Draft MCDP, the development of the subject site (c. 2.5Ha) can accommodate housing in the region of 45 units, which represents only c.11% of the total housing allocation for Monaghan for the lifetime of the new MCDP. To zone the subject site for "Proposed Residential" use now, as opposed to having it reserved for an indefinite period of time does not accord with the stated approach in the Draft MCDP for dealing with the current housing need and demand for the town.
- The site's current and proposed designation as a "Strategic Residential Reserve" demonstrates its suitability for accommodating housing, in addition to the existence of housing to the immediate north and east, as well as its proximity to the town centre. Taking this into account, it is put forward that the subject site ought to be zoned for "Proposed Residential" land use under the new MCDP, 2025-2031.
- Having examined the current planning status of lands proposed to be zoned objectives "Proposed Residential - A" and "Proposed Residential - B" in the Draft MCDP, we estimate that c. 27Ha is available to accommodate new housing, as other lands are already committed with extant permissions in place. The Draft MCDP states that 380 no. new dwellings will be delivered over the lifetime of the new Development Plan and based upon the stated figures in the Core Strategy of the Draft MCDP, as well as the availability of c.27Ha, this equates to a density c. 14 units per hectare. If only c.27Ha is available, then that would cater for c.320 no. new dwellings, thus leaving a shortfall of 60 housing units in Monaghan. The subject site is c.2.5Ha in area and, based upon the figures set out in the Core Strategy, we estimate that the site could cater for c.45 no. dwellings (at a density of 18/Ha), which would not exceed the Core Strategy figures for growth. It is therefore evident that the subject site ought to be zoned for "Proposed Residential" land use upon the adoption of new Monaghan County Development Plan 2025-2031.
- The subject site is ideally located to provide for housing as it lies within the development boundary for Monaghan, is c.1km from the town centre and is ideally positioned to provide for family type housing.
- The submission states that the subject lands are of no current benefit, in the short-term period of the lifetime of next Monaghan County Development Plan to "strategically" reserve the

subject site for future housing when it can be developed now and deliver a quantum of housing that accords with the Core Strategy.

- The future residential development of the subject lands, upon the appropriate zoning for residential land use being applied to same, will cater for the current demand for housing, thus contributing to the housing infrastructure of Monaghan.
- An opportunity to develop the subject site will ensure that current housing targets for Monaghan are met and the rezoning of same as objective “Proposed Residential” is deemed a reasonable and appropriate land use for the subject site. It is respectfully put forward that this proposal to zone the subject site for “Proposed Residential” reflects the policies and objectives of the CDP, notably its Core Strategy.
- Given the location of the lands within the settlement / development boundary for Monaghan, and its status as a Key Town, the most appropriate and logical approach to these lands is to zone them for “Proposed Residential” land use, which will allow the development of this site and delivery of housing in the County Town.
- The site’s location and proximity to necessary and existing services, facilities and access to meaningful and necessary physical infrastructure provides the most rational and sequential approach to the future of this site.
- The most logical sequence for future development, in line with the recommended sequential approach, is to zone the subject site “Proposed Residential” in order to provide for future housing and that the subject site is best placed to cater for housing given its current zoned status which recognises the sites suitability to accommodate housing.
- It is contended that the zoning of the subject site accords with the spirit of the Planning and Development Act which requires the preparation of a Core Strategy as the location of this site accords with the policy that “there must be cognisance of the need to consolidate urban settlements by keeping them as physically compact as possible and applying the sequential approach to land use zoning”. The zoning of this site will mitigate against urban sprawl and future development that is located beyond the footprint of existing settlements. This site should be zoned for “Proposed Residential” land use in the new County Development Plan as it is located within the defined development boundary for Monaghan and has already been recognised as being suitable for residential land use under the current and Draft Development Plans by way of its Strategic Residential Reserve land use zoning.
- The zoning of the subject site for residential land use will make lands available to accommodate much needed housing.
- The site is readily available for development, subject to permission, given that access, roads and services are all available.
- It is submitted that a logical and rational approach to future planning in Monaghan is to zone our client’s site for “Proposed Residential” land use given its proximity to neighbouring existing residentially zoned lands, existing physical infrastructure, proximity to town centre and this proposal’s compliance with the Core Strategy of the CDP
- Zoning the subject site will allow for the genuine delivery of much need housing within the period of the new County Development Plan, as upon the zoning of same, there are no planning or infrastructural impediments to the delivery of housing, subject to permission, thus delivering the quantum of housing as envisaged by the Core Strategy within the lifetime of the new Monaghan County Development Plan 2025-2031.
- It is respectfully put forward that the most logical approach is to zone the subject site Proposed Residential”, given its size, the number of units it will accommodate and its locational context adjacent to existing residential development.
- The subject site has been deemed appropriate for the development of housing in its entirety, rather the issue is the timing and delivery of same. In the making of the new Development Plan, now is considered to be the opportune time to apply an appropriate land use zoning

objective to same, i.e. “Proposed Residential”, as it is put forward that the subject site is best placed to deliver housing given its location and planning context.

- The carrying out of residential development of these lands will be consistent with nearby residential development thus utilising the land in a most efficient and sustainable manner, along with complying with the sequential approach to development.
- This submission towards the new Monaghan County Development Plan requests that in the adoption of same, that the subject site at Cornacassa Demesne, Monaghan, i.e. c.2.5Ha (c.6 acres) be zoned “Proposed Residential” land use.
- A zoning map showing the extent of the subject lands, a Land Registry map, a letter from Waterman Moylan supporting the rezoning application and a map showing OPW Flood Extents Map within the subject site accompanies the submission.

Chief Executive Response

The submission requests the rezoning of lands from ‘Strategic Residential Reserve’ to ‘Proposed Residential A’.

The subject lands are greenfield lands (c2.5Ha.) in the townland of Cornacassa Demense, Monaghan Town. It is located west of Monaghan town centre and Knockroe Glen residential estate, south of Scotstown Road (R186), and north/northwest of the Clones Road (N54). The subject site has direct access onto the Scotstown Road (R186).

The subject lands are within the settlement envelope, are Tier 1 ‘Serviced Zoned Land and are zoned part Strategic Residential Reserve and part Landscape Protection/Conservation in the Draft Development Plan.

A second submission has been made on the subject lands, requesting a change of zoning of part of MT28 from ‘Strategic Residential Reserve’ to ‘Recreation /Amenity’. The lands appear to be in use; goalposts are noted on the site and it is submitted that the site is in use as a gaelic training ground by St Louis School.

The OPR in their submission recommended that this site be reviewed and to rezone the lands for an appropriate land use where they do not support long term compact growth and / or do not follow a sequential approach to the zoning of lands and / or are in an area subject to flooding.

The Core Strategy of the Development Plan recognises the role of settlements in driving the development of the County and identifies the scope of development possible for the County, while remaining consistent with National and Regional policy. It also identifies the quantum and location of development for the plan period, consistent with the population targets and settlement hierarchy that reflects the availability of existing services, planned investment, sequential development and environmental requirements.

Whilst it is acknowledged that the lands have services available to them, there are sufficient lands zoned Proposed Residential A, which are suitable for residential development in more sequentially appropriate locations within Monaghan settlement envelope, to meet the projected population increase over the plan period and to contribute to the compact growth of the town.

There is a flood risk area to the east of the subject site referenced MTFRA 25 in Appendix 19 of the Strategic Flood Risk Assessment and the southern portion of the subject lands is identified as being within the 1 in 1,000 year storm/flood event area (OPW Flood Maps).

Given the location, the potential flood risk from the subject and adjoining lands and the current use of the lands, and the restricted access, it is recommended that the subject lands be zoned for Recreation/Amenity use.

Chief Executive Recommendations

It is recommended that the subject lands be zoned to 'Recreation/Amenity' use.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-106</u>	Rossmore Assets Limited	North Road, Monaghan Town	N/A

Summary of Submission & Issues Raised

- The submission requests the removal of the flood designation from the site.
- The submission site is centrally-located within Monaghan’s town centre and already has a structure built upon it, that of Lakeside Walk.
- The submission site is located at Lakeside Walk, North Road, Monaghan Town, Co. Monaghan. It is bound to south, east and west by the built-up area of Monaghan’s town centre, and it is bound to the north by a road, beyond which is Peter’s Lake. The entirety of the area around Peter’s Lake is built-up and urbanised.
- The property as it currently stands comprises 27no apartments from first to fifth floor and 5,500sqf of commercial space on the ground floor. Rossmore Assets Limited are connected to the commercial space on the ground floor only. Rossmore Assets Limited are connected to the 3no units on the ground floor of Lakeside Walk, two of which are currently occupied and one which is vacant.
- The submission relates to the proposed designation of the site as a Flood Risk Area and seeks to remove this designation from the upcoming Monaghan County Development Plan 2025-2031. Rossmore Assets Limited have engaged RPS Consulting Engineers to carry out a Flood Risk Assessment (FRA) on current CFRAM information in regards to flooding at the subject site. This report can be found at Appendix A of this submission.
- The draft Monaghan County Development Plan 2025-2031 proposes to partially designate the site a Flood Risk Area with Flood Zone A and B affecting the submission lands.
- The FRA by RPS Consulting which accompanies this submission states that there is a culvert running south from Peter’s Lake to join the Shambles River. Part of this culvert is constructed beneath the Lakeside Walk building which results in “limited areas” of Flood Zones A and B within the site.
- It is submitted that to retain the flood zone designation at the site could potentially serve to be used by others in preparing Retail Impact Assessments for out-of-centre developments.
- The application of Flood Zone A and B on the site serves only to restrict the potential usage of the ground floor units and in this way contradicts the purpose of Town Centre zoning and the permitted uses that accompany it, such as retail, leisure, and commercial.
- The submission site, with its location within Monaghan town centre and affected by town centre zoning, would benefit from being unhindered by flood zone designations and as a result be more capable of contributing to the changing role of town centres as identified in local, regional and national policy. Subjecting the site to normal development management standards along with a SSFRA would contribute to this.

Summary of Justification for removal of Flood Zone Designation on the subject lands

Rossmore Assets Limited seeks the removal of the flood designation from the site and submits that a more appropriate way of managing development proposals on the lands would be to subject the site to normal development management standards along with a SSFRA which would provide a more accurate analysis of the true extent of flooding on the site (if any) which, as mentioned in the FRA by RPS Consulting, is “limited.” The flood zone designation stems from an existing culvert under the lands, as opposed to a watercourse running through the lands. Empirical evidence is that the site has not been subject to flooding. It is considered possible to maintain the development potential of the submission site facilitating a wide-range of town centre uses while simultaneously requiring a site specific Flood Risk Assessment to efficiently manage and mitigate any risk of flooding.

Chief Executive Response

The submission requests the removal of the flood designation from the site.

The subject lands relate to a 'Town Centre' mixed-use commercial and residential property known as Lakeside Walk, North Road, Monaghan Town. It is bound to south, east and west by the built-up area of the town centre, and it is bound to the north by a road, beyond which is Peter's Lake. The entirety of the area around Peter's Lake is built-up and urbanised.

Rossmore Assets Limited are connected to the commercial space on the ground floor only. The ground floor is split into 3no units, two of which are occupied and the third of which is currently vacant.

There is a culvert running south from Peter's Lake to join the Shambles River. Part of this culvert is constructed beneath the Lakeside Walk building. The draft map for Monaghan Town indicates Flood Zone A and B affecting the submission lands.

The flood extents on the subject lands are based on detailed modelling by the OPW, published under the Catchment Flood Risk Assessment and Management (CFRAM) Programme in 2016. The Flood Maps have been developed to comply with the requirements of the European Communities (Assessment and Management of Flood Risks) Regulations 2010 to 2015 for the purposes of establishing a framework for the assessment and management of flood risks, aiming at the reduction of adverse consequences for human health, the environment, cultural heritage and economic activity associated with floods.

The CFRAM study has identified that part of the subject lands fall within Flood Zone A and Flood Zone B. The extent of the flood risk identified and more information can be found in Appendix 19 Strategic Flood Risk Assessment, prepared in conjunction with the Draft Monaghan County Development Plan 2025 – 2031.

CFRAM data is not prepared by Monaghan County Council and therefore the Council has no authority to amend mapping contained within it.

The Strategic Flood Risk Assessment has been reviewed/ revised as per OPR recommendation; this data is reflected in the amended maps set out in the revised SFRA and the green 'Flood Risk Areas' have been removed from the draft zoning maps 2025-2031.

Chief Executive Recommendation

The flood zone maps have been reviewed and amended in the revised Strategic Flood Risk Assessment and the green 'Flood Risk Areas' have been removed from the draft zoning maps 2025-2031.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-108</u>	Monaghan Retail Park Co-Ownership c/o Tony Bamford Planning	Monaghan Retail Park, Cornacassa, Monaghan	N/A

Summary of Submission & Issues Raised

Submission relates to zoning of the lands, 'Existing Commercial' and the associated retail policy. It notes that the 'Retail Park' consists of 11 units (3,802 sq. m.), with 5 units vacant. 'Next' is identified as the only 'open comparison' shop.

The submission states that allowing the Park to continually experience high levels of vacancy and thus denying the creation of new jobs is directly in conflict with national policy and the Core Strategy of the current and Draft Development Plans, noting that large national and international retail names have searched for modern retail space in Monaghan, however due to planning restrictions have walked away from the town.

The submission refers to the NPF seeking the reuse of vacant and under-occupied buildings, and NPO 11 obligating a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, and reducing urban sprawl, and the efficient use of land.

The submission notes Section 9.3 Compact Growth, Consolidation and Urban Regeneration of the Draft CDP, and contends that directing development to vacant premises such as Monaghan Retail Park, is compliant with the general thrust of the section.

The submission notes the contribution of retail to the economy, references supporting text from the Core Strategy in the promotion of economic development and job creation, as well as Draft Objective EDS01; 'To promote County Monaghan as a local and regional centre of trade, business and tourism and to build on its strong spirit of enterprise to create a dynamic local economy with job creation at its heart.' It contends that if job creation is genuinely part of the Council's economic strategy, then addressing vacancy at the Retail Park should be a priority.

The submission suggests the inclusion of a new retail objective to directly address the issue of vacancy;

Objective MTO 6: 'The Council recognises the long-term vacancy at Monaghan Retail Park which must be addressed. It is an objective of the Council to support new retail in the Monaghan Retail Park.'

The submission contends that the current and Draft CDP, effectively ensures the only lands in Monaghan where convenience and comparison retail is acceptable in principle is the Town Centre. It is argued that convenience and comparison retail shopping should be a fundamental part of the retail hierarchy, which in Monaghan Town (County Town) should include Neighbourhood level convenience retail with appropriate attending services.

The impact of current policy protects individual food store interests in the town centre, as opposed to seeking to protect the overall vitality and viability of the town centre.

The Draft CDP (sec. 4.6.2) recognises that core areas are the most suitable locations for high order and comparison goods as they are generally the most accessible for the catchment population and can also provide a compact and sustainable critical mass of commercial activity and public amenities, thereby reducing the need to travel.

The submission contends that high order and comparison goods exclude convenience retailing which supplies basic day to day convenience retail. The town centre is a leisure shopping and socialising destination. Food shopping, in contrast, is a necessity and a chore. Having smaller food stores located closer to the wider neighbourhoods is highly sustainable. More modest offerings in the outskirts of towns help fill the gap as part of a Neighbourhood centre offering.

The Existing Commercial zoned lands in the suburbs are in substantial areas of new residential and employment land and next to or within established communities. To this end, and as a means to address vacancy in the Park, it is suggested that an objective should be included to allocate the Retail Park or part of it as a Neighbourhood Centre, of importance in delivering smaller groups of shops and services.

A relaxation on the sale of comparison goods is also requested. Allowing a relaxation of two vacant retail warehouse units to allow for open comparison retail would help address some vacancy in the short term (1-2 years) at a scale that is entirely sustainable for the vitality and viability of the town centre.

The submission suggests the inclusion of a new retail objective to allocate 'Monaghan Retail Park' or part thereof as a 'Neighbourhood Centre' and to alter the zoning matrix to include retail (convenience) and retail (comparison) to 'Acceptable in Principle'

The submission states that the current Retail Strategy 2016-2022 is out of date and needs updated to reflect spending levels, patterns of shopping, allocation of the opportunities for new retail. It is acknowledged that the Draft CDP proposes to review the Retail Strategy. The submission proposes that the Council should commit to preparing the Strategy within 2 years of the new CDP ensuring it is in place for the 2-year review.

The submission recommends the inclusion of a new objective; RTO1 – To prepare a new Retail Strategy for the County within the first two years of the Monaghan County Development Plan 2025 – 2031

In addition, it is recommended that the Council should include the 2016 – 2022 Retail Strategy in the new Development Plan, and to publish it as part of the Material Amendments to allow for public consultation on its content.

Chief Executive Response

The submission included the planning history relating to the site. Of particular note are planning references 05/978, 04/112, 02/571 which restricted the use of the floorspace of the units in the park to the retail sale and ancillary storage of bulky goods only.

Also of note are five applications received between 2009 and 2024 which related to a change of use of some of the units within the park to discount food/ convenience retailing. The 2024 planning

application is currently subject to a further information request by the Planning Authority. The remaining four applications were refused planning permission by Monaghan County Council for reasons relating to, inter alia, being contrary to national and local retail planning policy, sequential approach justification, and impact on vitality and viability of Monaghan town centre. Two of these applications were refused on appeal by ABP.

Summary of planning applications of note relating to discount food / convenience retailing:

09/320 Aldi (change of use of Units 9 & 10 to licensed discount food store)

Refused by MCC (excessive level of convenience retailing, contrary to retail hierarch of Retail Strategy; no justification in terms of sequential approach, adverse impact on vitality and viability of town centre; insufficient parking)

10/36 Aldi (change of use of Units 9 & 10 to licensed discount food store)

Refused by MCC (excessive level of convenience retailing, contrary to retail hierarch of Retail Strategy; no justification in terms of sequential approach, adverse impact on vitality and viability of town centre; insufficient parking)

10/425 Aldi & cinema (change of use unit 1 to leisure complex & amalgamation of units 9 & 10 with building modifications, increase parking)

Planning permission granted on appeal by ABP (Ref; PL18.238810) for leisure complex (unit 1) & refused for (units 9 & 10) as discount food store (contrary to retail policies, sequential approach justification, impact viability and vitality of town centre)

20/296 Iceland (change of use of Unit 2 to convenience retail) Refused by MCC and ABP (Ref PL18.308410 – 20 (contrary to retail policies/strategy, zoning objectives, sequential approach test not demonstrated, detract from vitality and viability of town centre)

A planning application (ref. 2460318) has been lodged with the Planning Authority for the retention of convenience goods and non-bulky comparison goods for Units 9 & 10 (amalgamated) in non-conformity with condition no. 10 of 05/978. Further Information was requested by the Planning Authority in respect of a number of matters on 24 October 2024, but as of 11 February 2025 this had not been responded to by the applicant.

In the OPR's recommendation to the Draft CDP they refer to the need to prioritise retail provision in the town core, to adopt a sequential approach to development and the need to preserve the capacity of the national road network, and in particular to:

- NPO 6 of the NPF for the regeneration of towns, and RPO 4.45 of the RSES, supporting retail in town and village centres;
- The sequential approach to development as set out in the Retail Planning Guidelines
- NPO 74 of the NPF and NSOs for compact growth, sustainable mobility and transition to a low carbon and climate resilient society; and
- Section 10(2)(n) of the P&D Act 2000, as amended, and the Climate Action Plan 2024 and the Climate Action and Low Carbon Development Act 2015, as amended.

The planning decisions by Monaghan County Council and An Bord Pleanála affirm the importance of the retail hierarchy and the need to protect the viability and vitality of the town centre. The OPR recommendation reaffirms the need to prioritise retail provision in the town core, and comply with national policy provisions and guidelines, to support regeneration, compact growth, sustainable mobility and a transition to a low carbon and climate resilient society.

The policies contained in the current Retail Strategy reflect the most up-to-date Retail Planning Guidelines (2012) which states that there should be a general presumption against large out-of-town retail centres. It references those located adjacent or close to existing, new or planned national

roads/motorways. The need to enhance the vitality and viability of city and town centres in all their functions through sequential development is an overarching objective in both documents.

It is considered reasonable that the Development Plan should set out a timeframe for the preparation of a new Retail Strategy to commence. As such it is recommended that Retail Objective RTO 1 be amended as follows (omit strikethrough text and include new text).

RTO 1 To ~~prepare~~ commence the preparation of a new Retail Strategy for the County within the ~~lifetime~~ first two years following the adoption of the Monaghan County Development Plan 2025-2031.

Retail Policy RTP 1 of the Draft CDP provides for retail development to comply with the County Monaghan Retail Strategy 2016 – 2022.

Chief Executive Recommendations

Having considered the submission, it is recommended that Retail Objective RTO 1 be amended as follows (omit strikethrough text and include new text in red).

RTO 1 To ~~prepare~~ **commence the preparation of** a new Retail Strategy for the County within the ~~lifetime~~ **first two years following the adoption** of the Monaghan County Development Plan 2025-2031.

No further amendments are recommended.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-109</u>	Francis McKenna Buildtec Innovations Ltd (T/A Buildtec Acoustics)	Dublin Road, Monaghan Town.	N/A

Summary of Submission & Issues Raised

- Submission is from Buildtec Innovations Ltd. (T/A Buildtec Acoustics) a local rate payer operating from the Rossmore Factory, Dublin Rd, Monaghan Town. Author notes the proposal in the Draft County Development Plan to zone the Rossmore Factory as a 'Flood Risk'.
- It is submitted that Buildtec Innovations Ltd have been operating at these premises for many years and that there has never been a single incident of flooding on the site.
- The submission raises concerns at the effect the Flood Risk Area has on his business, his ability to get insurance and any plans for future improvements or expansions.
- The submission also raises concerns about the lack of direct communication with affected business owners prior to making this proposal public, as well as the insufficiently detailed rationale available for review on the Council's website.
- The submission refers to the SFRA Appendix in the Draft Monaghan County Development Plan 2019 – 2031, specifically to MTFRA48 which is vague and does not correspond with the site.
- It is submitted that a thorough, site-specific assessment was not conducted. There is also a limited time available to make a comprehensive submission.
- Submission requests the withdrawal of the Flood Risk Area from the Rossmore Factory site and retain the zoning as currently exists in the Monaghan County Development Plan 2019 – 2025.

Chief Executive Response

The lands are currently zoned 'Industry/Enterprise/Employment in the Draft Monaghan County Development Plan 2025 – 2031. This zoning remains unchanged from the previous plan, Monaghan County Development Plan 2019 – 2025.

The flood extents on the subject lands are based on detailed modelling by the OPW, published under the Catchment Flood Risk Assessment and Management (CFRAM) Programme in 2016. The Flood Maps have been developed to comply with the requirements of the European Communities (Assessment and Management of Flood Risks) Regulations 2010 to 2015 for the purposes of establishing a framework for the assessment and management of flood risks, aiming at the reduction of adverse consequences for human health, the environment, cultural heritage and economic activity associated with floods.

The CFRAM study has identified that part of the subject lands fall within Flood Zone A and Flood Zone B. The extent of the flood risk identified and more information can be found in Appendix 19 Strategic Flood Risk Assessment, prepared in conjunction with the Draft Monaghan County Development Plan 2025 – 2031.

CFRAM data is not prepared by Monaghan County Council and therefore the Council has no authority to amend mapping contained within it.

The Strategic Flood Risk Assessment has been reviewed/revised as per OPR recommendation; this data is reflected in the amended maps set out in the revised SFRA and the green 'Flood Risk Areas' have been removed from the draft zoning maps 2025-2031.

Issues relating to insurance fall outside the remit of the planning process and cannot be considered as part of the development plan review.

Chief Executive Recommendation

The flood zone maps have been reviewed and amended in the revised Strategic Flood Risk Assessment and the green 'Flood Risk Areas' have been removed from the draft zoning maps 2025-2031.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-115</u>	Joe Conolly	Cornacassa, Monaghan	N/A

Summary of Submission & Issues Raised

- Submitter has viewed plans for a new bypass road to pass through the vicinity of their land.
- Would like to know the scale and size of this bypass.
- Would like to know the impact, when it begins, will have on farming life.
- Proposes that if the bypass road goes ahead that they will be given a right of way off the new by-pass to my lands.
- Requests to be kept up-to-date with proceedings of the new bypass as this will have a major life changing effect on my farm with a public road going through it.

Chief Executive Response

The submission is not accompanied by a map to confirm the farmlands which are referred to, but it is clear that their concerns relate to an 'Indicative Road Proposal' at Cornacassa as shown on Map MTDP 1 of the Draft Development Plan.

As has been confirmed by Monaghan County Council Road Design Section, any road proposal will be required to progress through a phased design process, will involve a feasibility study, constraints, environmental evaluation and design. Public consultation and stakeholder engagement will be a part of this process. The design process will not commence until funding becomes available, and will be undertaken in line with relevant transport planning guidelines, as outlined in section 7.3.1 and 7.3.4 of the draft County Development Plan.

Chief Executive Recommendation

No amendment recommended.

Submission Reference	Name/Organisation	Location of Subject lands	Map Booklet Page No.
<u>MN-C22-MCDP-120</u>	Gary McPhillips c/o Hughes Planning & Development Consultants	18 Old Cross Square, Monaghan Town	27

Summary of Submission & Issues Raised

Subject lands

- The submission requests that the subject lands zoned as ‘Existing Commercial’ are rezoned as ‘Proposed Residential A’.
- The subject land extends to approximately 0.06 hectares and has an existing building facing onto the R937 Regional Road. The land is bound to the immediate northwest and southwest by existing residential neighbourhoods and to the east by lands zoned as ‘Industry/Enterprise/Employment’. Further north are lands which are zoned ‘Town Centre’, with a mix of commercial, recreation, and employment services available.
- The site is circa 60 metres from Monaghan town centre which has an array of local shops, amenities and facilities. Moreover, directly opposite the site, is McCarren’s Pub and to the southwest the Blayney Academy Football Club. The recreational facilities within the immediate area include Monaghan Rugby Club, Coral Leisure Centre, Omniplex Cinema, Monaghan United Football Club, Rossmore Forest Park, a Skateboard Park, Monaghan County Museum, Blayney Academy Football Club, McCarren’s Pub, the Universal Combat Arts Academy and The Fitness Habit. There are shopping facilities, for local groceries and other services, within circa 600 metres from the subject lands, or circa 8 minutes walking distance. Further to this, the Ulster Canal runs through the town, as well as the Ulster Canal Greenway, circa 50 metres from the subject lands.
- It is highlighted in the submission that the majority of lands to the south of the site are zoned ‘Existing Residential’ under the Draft Monaghan County Development Plan 2025-2031.
- The immediate area surrounding the site is characterised by residential housing with the subject lands adjoined by residential properties along Old Cross Square. The area is well serviced by public transport with the site being situated circa 70 metres from a bus stop servicing the MN1 and MN2 routes. Further to this, public transport services are available via Bus Eireann Intercity bus nos. 162, 175, 175a, and 182 to Dundalk, Cavan, and Drogheda. The bus station for Bus Eireann services is located approximately a 12 minute walk from the subject lands.
- The availability of reliable public transport services within such close proximity to the subject lands is seen as one principal factor with regard to its zoning to provide for residential development. The use of the site to accommodate a planned and co-ordinated residential scheme in place of existing commercial space will allow for the greater use of existing public transport services and will support the economic growth of these services as well as the growth of Monaghan as a Strategic Growth Settlement Town, in line with regional policies.
- In addition to public transportation, the subject lands are well-suited to access by private vehicles, due to a myriad of national and regional motorways passing close to the site. The subject lands are situated a 2 hour drive from Dublin and there are multiple journey options available including the N2 – M2 – Dublin, or the N2 – N33 – M1 - Dublin. Moreover, Dundalk is situated a 50 minute drive from Monaghan and is accessible via the N2 – N53 - Dundalk. The site has excellent connectivity via road to major cities in Ireland and Northern Ireland.
- Dublin Airport and Belfast Airport, both are a c.1.2hrs drive from the subject lands, in the south-east and north-east directions respectively. Both are international airports, providing commercial airline services to national and European destinations.

- There is a selection of national and secondary schools within the vicinity, as well as Gaelscoil Ultain. There are 4 no. schools within 700 metres of the subject lands and Gaelscoil Ultain and Monaghan Collegiate School are situated a 10 minute cycle from the subject lands.
- The wider area consists of smaller settlements, many of which use Monaghan as a main centre for shopping, supplies, recreation, entertainment, education and employment. Carrickmacross is the next largest town and is situated approximately a 30 minute drive south of Monaghan. The Expressway 32 and 182 bus routes connect Carrickmacross to Monaghan.
- The rezoning of the subject lands to Proposed Residential A will provide consolidation of the lands that are situated in a prime location proximate to Monaghan town centre.

Planning Context of the Subject lands

- The Draft Development Plan 2025-2031 aims to progress the development of Monaghan Town as a connected centre of scale, with the necessary critical mass, in terms of population and employment, to enable the area to compete and grow to fulfil its potential and drive regional and national development.
- It is considered that the subject lands provide enough opportunity space to create a high-quality residential development. The subject lands extend to 0.06 hectares, which is considered adequate to provide a residential scheme with high-quality open space.
- It is of note that the land uses listed above for Existing Commercial restrain the site from contributing to the consolidation of residential development in Monaghan Town. It is considered that the draft land use zoning objective for the subject lands is considered premature and restrictive.
- The subject lands are located immediately adjacent to lands zoned Town Centre, making them approximately a 2 minute walk away and within the 10-15 minutes walk requirement for Tier 1 sites. In addition, they have the capacity for further development with an existing building at the front of the site and spare land at the rear which could accommodate between 1 and 5 new dwellings. When comparing the subject lands to those zoned Tier 1, it is clear that the application of a Tier 1 zoning would be appropriate.

Regional Spatial and Economic Strategy for the Northern and Western Region

- As the subject lands are located within the centre/environs of Monaghan Town, it is considered that the rezoning of the site to provide residential units is compliant with the Regional Spatial and Economic Strategy for the region in providing much-needed accommodation within an existing built-up area within a Key Town.

Project Ireland 2040 – National Planning Framework

- Strategies included in Chapter 2.2 of the National Planning Framework seek to target a greater proportion (40%) of future housing development to be within and close to the existing ‘footprint’ of built-up areas. This target is to be achieved by making better use of under-utilised land and buildings, including ‘infill’, ‘brownfield’ and publicly owned sites and vacant and under-occupied buildings, with higher housing and jobs densities, better serviced by existing facilities and public transport. It is considered that, subject to increased development, the subject lands is appropriately located so as to contribute to the national strategic outcomes of the National Planning Framework
- Submission notes that the rezoning of the subject lands to the 10 National Strategic Outcomes:
 1. *Compact Growth*
 - The site is located within the centre of Monaghan Town; thus it is located within close proximity to existing transport infrastructure including Bus Eireann bus services. It is an appropriate location for residential development and the consolidation of this area. The development of the site allows for increased permeability within the immediate area and for the increased viability of existing local community infrastructure.
 2. *Enhanced Regional Accessibility*

- The subject lands are located within 800 metres of Bus Eireann services available via North Road. As such, it is considered that the subject lands is well serviced by public transport offering access to larger urban centres at Dublin.

3. Strengthened Rural Economies and Communities

- The development of the subject lands presents a direct opportunity to consolidate development within the centre of Monaghan Town. A significant residential development at this location will result in the increased viability of commercial services within the immediate area and presents the potential for the further expansion of Monaghan Town.

4. Sustainable Mobility

- In compliance with national policy guidance, the co-ordinated development of the subject lands would ensure that all built form is constructed to the highest architectural standard and is suitably energy-efficient and equipped for challenges anticipated from a changing climate.

5. A Strong Economy supported by Enterprise, Innovation and Skills

- The development of the subject lands and associated consolidation of Monaghan Town could result in a heightened extent of commercial development, enterprise and innovation within the town in the future which would diversify and strengthen the local community.

6. High Quality International Activity

- Monaghan Town is both strategically located and served by infrastructure so as to represent a unique location for the development of a sustainable urban centre. Whilst the development of this area will have no direct impact on international competitiveness, it is considered that the guided development of Monaghan Town and Monaghan more broadly, presents an opportunity to set an international precedent for sustainable development.

7. Enhanced Amenity and Heritage

- The development of the subject lands presents a direct opportunity to improve permeability within the immediate area through the improvement of the existing underutilised green fields into residential development with adequate amenity space and open space.

8. Transition to a Low Carbon and Climate Resilient Society

- As stated previously, all built forms within the subject lands will be suitably energy-efficient and equipped for challenges anticipated from a changing climate.

9. Sustainable Management of Water, Waste and other Environmental Resources

- Any development of the subject lands would be in line with the principles of Irish Water and the sustainable management and development of the area.

10. Access to Quality Childcare, Education and Health Services

- The subject lands is situated within proximity to various primary and secondary schools. Furthermore, with regard to local amenities, it is noted there are a range of local shops, restaurants, public houses and services available in the town. The further development of the area and associated increase in population growth is considered necessary to provide an economic justification for the provision of improved recreational and educational services with the provision of shopping facilities generally calculated on the extent of the local population available to avail of such services. It is thus submitted that the subject lands, which would be considered an underutilised commercial site, would be best utilised by residential development and would therefore be consistent with the provisions of the National Planning Framework.

National Planning Framework Review (NPF)

- The draft revisions of the NPF identifies an increased national population growth target of 6.1 million residents by 2040, a significant increase from the originally adopted target of 5.8 million in 2018. Whilst the majority of this population growth is focused on the Eastern and Midland Region (EMRA), we would note, in the context of this submission, that the Northern and Western Region (NWRA) is expected to accommodate 10% of this increase in population growth with the population of the region expected to rise by 150,000 between 2022 and 2040 to a total of 1 million.
- The draft revision notably reaffirms the focus on renewing and developing existing settlements as established under the NPF 2018, rather than allowing the continual expansion and sprawl of cities and towns out into the countryside, at the expense of town centres and smaller villages. The target is for at least 40% of all new housing to be delivered within the existing built-up areas of cities, towns and villages on infill and/or brownfield sites. The remaining homes will continue to be delivered at the edge of settlements and in rural areas.
- With regards to key changes between the NPF 2018 and the draft revision, it is noted that number of houses required per annum has increased from between 30-35,000 per annum to a total of 50,000. Whilst this change is considered to reflect the ongoing housing crisis within the country it is noted that the document makes no specific reference to changing household sizes or increased demand for housing.
- The draft revision also places greater emphasis on land activation and active land management to ensure transport orientated development (TOD) opportunities are realised at greenfield and brownfield sites adjacent to public transport hubs. The submission makes reference to the creation of measures such as the Residential Zoned Land Tax and Land Value Sharing with the purpose of such tools being to better manage the supply of development land, to meet housing land requirements, ease pressure on building land and housing costs and to capture gains in land value from the development process for investment in necessary public infrastructure

Urban Development and Building Heights - Guidelines for Planning Authorities, December 2018

- It is considered that the subject lands is appropriately located so as to accommodate a residential development of appropriate density within the centre of Monaghan in close proximity to existing public transport services and amenities. The design of any future development can respond to the topography of the area and the nature of the existing built form so as to limit any impacts on existing amenities. The site is located within the centre of the immediate area and presents a direct opportunity to consolidate and guide the future growth of the area in a manner that limits the need for unsustainable commuting patterns and improves the sense of community and safety within the wider area. The development of the site is thus considered to be appropriate in the context of the Urban Development and Building Heights - Guidelines for Planning Authorities, December 2018.

Quality Housing for Sustainable Communities – Guidelines for Planning Authorities

- The subject lands is located adjacent to the centre of Monaghan and is situated within 800 metres of existing Bus Eireann services in the town. The site is situated within close proximity to multiple primary and secondary schools and numerous recreational, sporting and entertainment services.
- Residential development on the subject lands would allow for the greater utilisation of these existing services and would allow for the formation of a strong community within the centre of Monaghan Town in accordance with the provisions of the Quality Housing for Sustainable Communities – Guidelines for Planning Authorities (2007).

Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024)

- A residential development upon the subject lands in compliance with the above density range would comprise a scheme of between 2-6 dwellings. The development of the subject lands to

provide density in line with the guidance provided within the Compact Settlements Guidelines is considered appropriate to ensure the sequential development of Monaghan Town and the appropriate consolidation of the town's development boundary.

Conclusion

- The Draft Monaghan County Development Plan 2025-2031 has remained unchanged from the existing zoning of Existing Commercial.
- The subject lands are better suited for Proposed Residential A land use zoning given the location of the land within an existing residential area in the centre of Monaghan Town and given the increase in population across the country. The subject lands are ideally located within the centre of Monaghan Town, close to services, amenities, public transport, and residential development on this land would further support the growing population of Monaghan Town and County Monaghan as a whole.

Chief Executive Response

The submission requests that the subject lands which are zoned as 'Existing Commercial' are rezoned to 'Proposed Residential A'.

The subject lands comprise a two-storey property and associated sheds/outbuildings/yard area located to the rear. The property is located at the end of residential terrace and fronts onto Regional Road 937. Access to the rear of the lands can be obtained through the Pound Hill Road to the south of the site.

The lands are currently zoned as 'Existing Commercial'. The zoning relates to the subject lands in question as well as additional lands located to the north of the subject lands. It is considered however that given that the building located within the subject lands is residential in nature and the sheds to the rear are located within the curtilage of same, the land use zoning should be amended to 'Existing Residential'.

It should be noted that the rezoning of the subject lands to 'Existing Residential' does not preclude residential development on the lands subject to compliance with other relevant objectives and policies set out in the Development Plan.

Chief Executive Recommendation

It is recommended that the subject lands are rezoned from 'Existing Commercial' to 'Existing Residential'.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-136</u>	Eddie O’Gara	N/A	N/A

Summary of Submission & Issues Raised

- Submission wishes to question the proposed road from Old Cross Square along the greenway to Annahagh/ Combilift roundabout
- The proposed plan negatively impacts the greenway (maybe that was the plan in tarmacking it)
- Severs the pedestrian / cycle connection from Scout Hall to greenway.
- Adds traffic to the already busy old cross square junction.
- Negatively impacts the pedestrian circulation from Old cross Square to the south of the town (Latlorcan etc)
- Locks us further into vehicle movement at the expense of pedestrians and cyclists especially vulnerable pedestrians.
- Will increase traffic in town and therefore make worse the traffic problem within the town.
- Discourages active transport and therefore healthy lifestyles.
- Reduce the liveability of the town, therefore increase vacancy and negatively impact the economy of town.
- By all means open the lands opposite combi lift / fire station but as soon as the route gets close the greenway it should stop and pedestrian / cycle connection only from then into town.
- These roads should all be checked with our national transport emissions requirements etc.
- We know since the 1960's that more roads = more traffic and what Monaghan town does not need is more traffic

Chief Executive Response

The submission to the Draft Monaghan County Development Plan is welcomed and the comments made are noted. This submission centres upon an indicative road proposal shown on Map MTDP1 of the Draft Development Plan and raises concerns about potential impacts on the greenway and active travel, traffic at Old Cross Square, and increasing the dominance of vehicles.

As confirmed by Monaghan County Council Road Design Section, any road proposal will be required to progress through a phased design process, which will involve a feasibility study, constraints, environmental evaluation and design. Public consultation and stakeholder engagement will be a part of this process. Proposals will also need to consider how this proposed link road will interact with or affect other objectives of the County Development Plan, including active travel, road safety and urban regeneration. The design process will not commence until funding becomes available and will be undertaken in line with relevant transport planning guidelines, as outlined in section 7.3.1 and 7.3.4 of the draft Monaghan County Development Plan. In respect of comments made in relation to discouraging active travel and healthy lifestyles, it should be noted that the Draft Development Plan includes a number of policies and objectives relating to active travel and recreational walking and cycling (Section 7.4 of the Draft Development Plan). The overarching objective of which is to encourage and support increased active travel within the County during the lifetime of the plan, promoting walking and cycling as an efficient, sustainable, health, recreational and viable commuting mode of transport.

Chief Executive Recommendation

No amendment recommended.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-137</u>	Monaghan Harps GAA c/o Coyle Engineering	Lands at Cornecassa Demense, Monaghan Town	28

Summary of Submission & Issues Raised

The submission requests the rezoning of lands from Strategic Residential Reserve to Recreation/Amenity.

The submission is summarised as follows:

- An area of land referenced within Plot MT 28 on Monaghan Town Settlement Envelope, specifically the lands in the ownership of Monaghan County Board and known as Mullaghduin Playing Fields
- The lands are currently used as playing fields for GAA purposes by the St Louis School on a leased basis for a minimum of 3no years and have been used as playing fields as far back as 1923 by Monaghan Harps GAA Club.
- The land was zoned Recreation and Amenity in MCDP 2013-2019, Strategic Residential Reserve in MCDP 2019-2025 in error
- Given the limited number of amenity areas within Monaghan Town which is evidenced by St Louis current used on the lands, it is requested that the lands be returned to Recreation and amenity zoning
- Part of the lands are currently identified as a flood risk within the CFRAMS mapping which further supports return of the lands to Recreation and amenity zoning

Chief Executive Response

The submission requests the rezoning of lands from Strategic Residential Reserve to Recreation/Amenity.

This submission relates to greenfield lands (c2.5Ha.) in the townland of Cornacassa Demense, Monaghan Town. It is located west of Monaghan town centre and Knockroe Glen residential estate, south of Scotstown Road (R186), and north/northwest of the Clones Road (N54). The subject site has direct access onto the Scotstown Road (R186).

The subject lands are within the settlement envelope, are Tier 1 'Serviced Zoned Land and are zoned part Strategic Residential Reserve and part Landscape Protection/Conservation in the Draft Development Plan.

A second submission has been made on the subject lands requesting a change of zoning of part of MT28 from 'Strategic Residential Reserve' to 'Proposed Residential A'. The lands appear to be in use; goalposts are noted on the site and it is submitted that the site is in use as a gaelic training ground by St Louis School.

The OPR in their submission recommended that this site be reviewed and to rezone the lands for an appropriate land use where they do not support long term compact growth and / or do not follow a sequential approach to the zoning of lands and / or are in an area subject to flooding.

The Core Strategy of the Development Plan recognises the role of settlements in driving the development of the County and identifies the scope of development possible for the County, while remaining consistent with National and Regional policy. It also identifies the quantum and location of development for the plan period, consistent with the population targets and settlement hierarchy that

reflects the availability of existing services, planned investment, sequential development and environmental requirements.

Whilst it is acknowledged that the lands have services available to them, there are sufficient lands zoned 'Proposed Residential A', which are suitable for residential development in more sequentially appropriate locations within Monaghan settlement envelope, to meet the projected population increase over the plan period.

There is a flood risk area to the east of the subject site referenced MTFRA 25 in Appendix 19 of the Strategic Flood Risk Assessment and the southern portion of the subject lands is identified as being within the 1 in 1,000 year storm/flood event area (OPW Flood Maps).

Given the location, the potential flood risk from the subject and adjoining lands and the current use of the lands, and the restricted access, it is recommended that the subject lands be zoned for Recreation/Amenity use.

Chief Executive Recommendation

It is recommended that the subject lands be zoned to 'Recreation/Amenity' use.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-144</u>	Marie Curley and Marian Egan	Lands at Aghananiny, Monaghan Town	29

Summary of Submission & Issues Raised

The submission requests access to lands at Aghananiny or amendment to zoning of said lands.

The subject lands (16Ha.) are currently zoned Residential c1ha., Landscape Protected c13ha. and Agriculture c2ha.

Access:

- One access point through narrow single vehicle lane also used by other householders/property owners
- Access to the agriculture parcel is only accessible via the residentially zoned area initially and continuing on through the Landscape Protected zoned area
- It is the submitters understanding that a Residential zoned area does not allow the use or construction of Farm Buildings or the carrying on of Farming activities
- The Residential zoned area is surrounded by the Landscape Protected zoned area which, in turn does not permit the use or construction of Farm Buildings or the carrying on of Farming activities. This section is accessible only via the residential zoned section, which as already alluded to above, is only accessed via a shared single vehicle lane-way.
- The proposed R162 to Corlat Roundabout on the N2, which has been part of the Council's Development Plans for a considerable number of years now, cuts into a large section of approx two thirds of the perimeter of the property (Southern and Eastern aspects)
- Under current zoning and subsequent restrictions, it could be said that the potential of the property and the ability to plan for the future of the property, and by extension, the rights of the owners, have been severely curtailed.

It is requested that Monaghan County Council considers one of the following:

1. The section of the property zoned Landscape Protected be returned to Agricultural status, with consideration being given to alternative access point(s), in order to avoid heavy traffic/machinery having to go through the residential zone, and thereby freeing up the residential zoned area for future planning and development.

Or,

2. Consideration be given to a more appropriate and better functioning zoning plan, and one which, importantly, gives due consideration to additional/alternative Access Points. This in turn would allow for future planning and development. With the current housing crisis firmly in mind, this might include zoning for low density housing, i.e. Residential B Zoning, adjacent to the planned new road and/or the land directly adjacent to Cathedral Walk (Northern aspect), where the options for new Access point(s) and connection to utilities should already exist.

Overall, with the current zoning strategy and with only one Access Point via a shared narrow single lane-way this in itself, is problematic.

Additionally, in its current status, we have no useful insight as to when Monaghan County Council will commence the new by-pass road, which, as already mentioned, is planned to cut through a considerable portion of the property.

Taking all of the above into consideration, the owners are presented with, and have endured, a very difficult situation which has been ongoing for many years.

Chief Executive Response

The submission requests access to lands at Aghananimy or amendment to zoning of said lands.

The subject lands relates to 16Ha. of land at Aghananimy, Monaghan Town which is zoned in 3 parcels of land: c1Ha. 'Residential', c13Ha. 'Landscape Protection/Conservation' and c2Ha. Agriculture.

The residential and Landscape Protection lands are located immediately inside the south-eastern limit of Monaghan Town Settlement Envelope. An indicative road proposal (R162 to Corlat Roundabout on the N2) proposed in the southern and eastern two-thirds of the landholding splits the aforementioned lands from the agricultural lands outside the Settlement Envelope.

It is submitted that a shared single vehicle lane serves the zoned lands and the agricultural lands and that the current zoning strategy with only one access point is problematic. It is also submitted that the development potential and property owner rights have been severely curtailed by the zoning and subsequent restrictions.

The submission requests two zoning options for consideration as follows:

1. Rezone 'Landscape Protection/Conservation' parcel to Agriculture
Or,

2. Rezone 'Landscape Protection/Conservation' parcel to 'Proposed Residential B'

The Council notes that this zoning would be adjacent to the planned new road and/or the land directly adjacent to Cathedral Walk where the options for new access point(s) and connection to utilities may already exist.

The Core Strategy of the Development Plan recognises the role of settlements in driving the development of the County and identifies the scope of development possible for the County, while remaining consistent with National and Regional policy. It also identifies the quantum and location of development for the plan period, consistent with the population targets and settlement hierarchy that reflects the availability of existing services, planned investment, sequential development and environmental requirements.

The subject lands are located immediately inside the south-eastern limit of Monaghan Town settlement envelope and the rezoning of the lands for residential development would therefore not contribute to the compact growth of the town. Additionally, there are sufficient lands suitable for residential development in more sequentially appropriate locations to meet the projected population increase over the plan period.

On this basis, it is recommended that the Landscape Protection/Conservation parcel be dezoned and the Settlement Envelope be amended/reduced to reflect this dezoning.

Chief Executive Recommendation

It is recommended that the 'Landscape Protection/Conservation' parcel be dezoned and the settlement envelope be amended accordingly.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-149</u>	Cavan and Monaghan Education and Training Board	N/A	149

Summary of Submission & Issues Raised

- The submission from Cavan and Monaghan Education and Training Board requests the provision of a bus service and footpath from Monaghan Town to Monaghan Youthreach.
- Monaghan Youthreach offers fulltime education and training programmes for early school leavers aged between 15 and 20 years. Youthreach learners experience fine levels of disadvantage, and it is important these learners are supported to attend fulltime education.
- Monaghan Youthreach is a 25-place centre. Classes run from the beginning of September to the end of July each year and a number of our current learners who require transport from Monaghan Town to Youthreach on a daily basis.
- Transport for Ireland currently provide a bus service to learners attending Monaghan Institute and we request to have this service extended to cover Monaghan Youthreach learners.
- Request that consideration be given to the construction of a footpath out to Monaghan Youthreach. Monaghan Youthreach is located on an extremely busy road and the current footpath ends at the entrance to Monaghan Institute and M-TEK buildings.

Chief Executive Response

This submission requests an improved bus service provision, however, this falls outside of the remit of the County Development Plan. The comments made in respect of the construction of a footpath is noted. The provision of Active Travel will be prioritised to areas of greatest need based on an economic assessment which would include a Cost Benefit Analysis. In this instance, given the considerable cost estimate versus the relatively small number of pedestrians that would be serviced by the footpath, the Benefit-to-Cost ratio is unlikely to be unfavourable.

Chief Executive Recommendation

No amendment recommended.

Core Strategy Summary - Monaghan Town

As detailed in the Chief Executives response to the submission received from the Office of the Planning Regulator (Submission MN-C22-MCDP-126) the Core Strategy has been revised having regard to the amended Housing Supply Target Table. The residential zoned land requirement for Monaghan Town has been adjusted to 30.91ha as indicated in the revised Table 2.5, a reduction of 1.13ha from the draft Plan.

Following consideration of the submissions received, a number of residential zoning changes have been recommended for Monaghan Town in this report. To ensure alignment with the revised Core Strategy, further alterations to the residential zonings have been recommended as detailed in the table below. The left hand column of the table indicates the lands recommended to be zoned for residential use, while the column on the right recommends lands to be rezoned from Proposed Residential A or B. Related maps identifying the changes are attached for reference.

The Chief Executive's report recommends the rezoning of lands at Kilnacloy (Submission No 58) from 'Landscape Protection/Conservation' to 'Proposed Residential A'.

In addition, it is recommended to change in part, the zoning of lands at Mullaghduin (Submission No 65) from 'Strategic Residential Reserve' and 'Landscape Protection/Conservation' to 'Proposed Residential A'.

It is recommended that lands at Coolshannagh (Submission No 57) be rezoned from 'Proposed Residential A' to 'Recreation and Amenity'.

It is recommended that lands at Drumbear (Submission No. 87) be rezoned from 'Proposed Residential A' to 'Existing Commercial'.

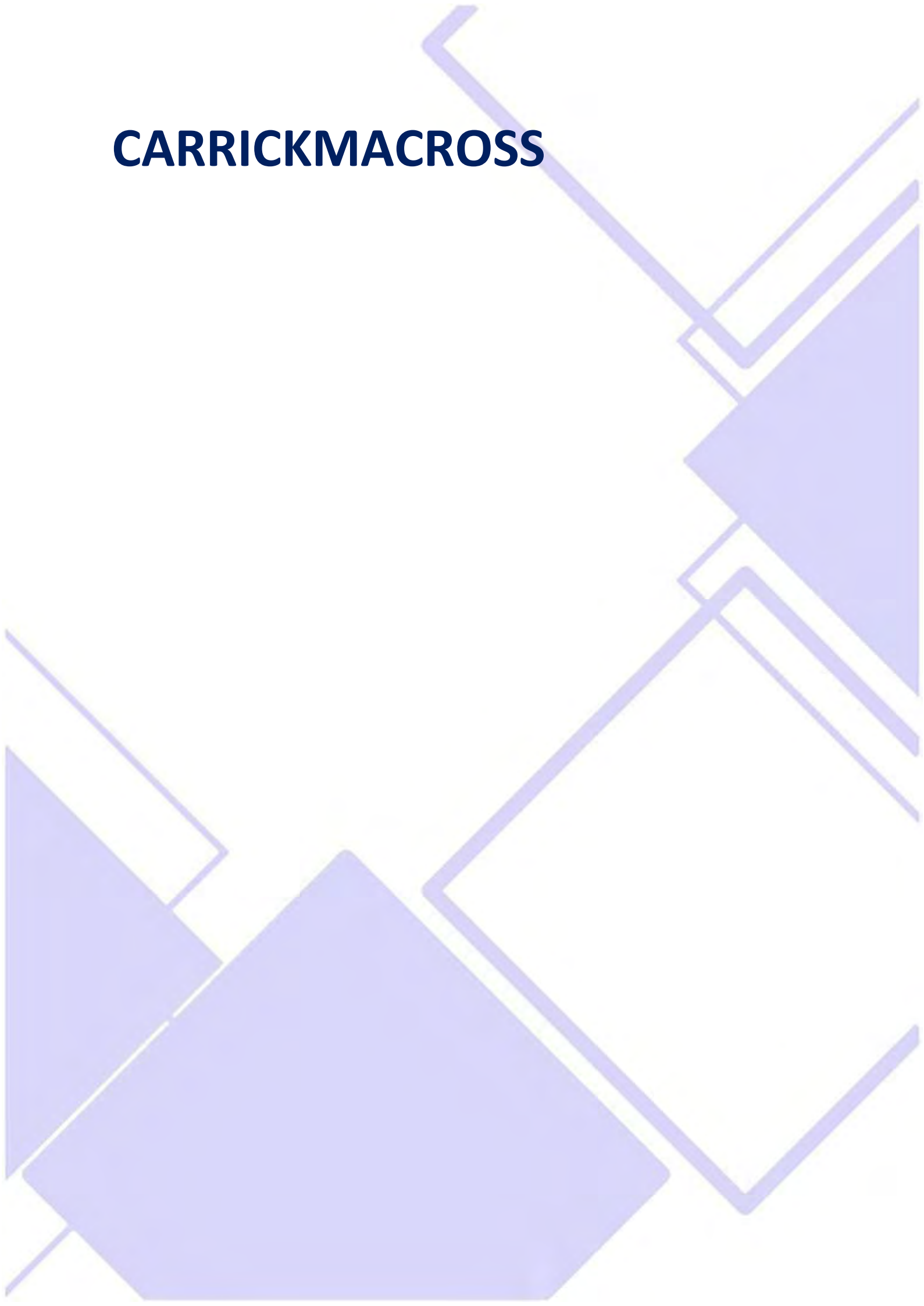
It is recommended that lands at Drumbear (Submission No 53) be rezoned from 'Proposed Residential B' to 'Strategic Residential Reserve', and a small portion as 'Landscape Protection/Conservation'.

It is recommended to rezone lands at Mullaghcroghery (identified on attached Amendment Map-Site No.1, Park Road) from 'Residential B' to Landscape Protection/Conservation.

It is recommended to rezone lands at Latlorcan (identified on attached Amendment Map-Site No.2, Latlorcan), lands at Mullaghduin (identified on attached Amendment Map-Site No.3, Mullaghduin), and lands at Drumbear (identified on attached Amendment Map-Site No.4, Drumbear) from 'Proposed Residential A and B' to 'Strategic Residential Reserve', due primarily to their peripheral locations within the settlement envelope, and/or potential servicing difficulties.

Submission No.	Area of proposed additional Residential A & B Zonings	Submission No./ Site No.	Area of proposed Residential A & B Zonings be rezoned/dezoned
58 (Kilnacloy)	0.879 ha	57 (Coolshannagh)	0.3802 ha
65 (Mullaghduin)	5.035 ha	87 (Cootehill/Ballybay Rd)	0.209 ha
		53 (Drumbear)	1.951 ha
		Site 1 (Mullaghcroghery)	0.4022 ha
		Site 2 (Latlorcan)	1.671 ha
		Site 3 (Mullaghduin)	1.227 ha
		Site 4 (Drumbear)	1.65 ha
Total area of lands proposed for addition	5.914 ha		
Reduction as per revised Core strategy	1.13 ha		
Total	7.044 ha	Total area of lands proposed for rezoning	7.490 ha

CARRICKMACROSS



Submissions relating to Carrickmacross			
Submission No.	Name/Organisation	Location of Subject Lands	Page No.
<u>MN-C22-MCDP-15</u>	Donagh and Siobhan Goulding	Lands at Nafarty, Carrickmacross	342
<u>MN-C22-MCDP-16</u>	Con and Kay Goulding	Lands at Nafarty, Carrickmacross	344
<u>MN-C22-MCDP-34</u>	Revalo Properties Limited c/o SCA Planning & Development Consultants	1 Kingscourt Road, Carrickmacross	347
<u>MN-C22-MCDP-36</u>	Aiden Daly c/o Ken Lonergan & Associates	Naffarty, Carrickmacross	349
<u>MN-C22-MCDP-38</u>	Ronan Casey	Link Roads, Carrickmacross	350
<u>MN-C22-MCDP-39</u>	Eakin Developments Ltd c/o Ken Lonergan & Associates	Drummond Otra, Dundalk Road, Carrickmacross	352
<u>MN-C22-MCDP-40</u>	Glassford Developments Ltd c/o Ken Lonergan & Associates	Magheross, Drumconrath Road, Carrickmacross	354
<u>MN-C22-MCDP-41</u>	Glassford Developments Ltd (2) c/o Ken Lonergan & Associates	Magheross, Drumconrath Road, Carrickmacross	356
<u>MN-C22-MCDP-42</u>	John Conlon c/o Ken Lonergan & Associates	Mullanarry, Carrickmacross, Co. Monaghan	357
<u>MN-C22-MCDP-43</u>	B & C Contractors (Glassford Developments Ltd) c/o Ken Lonergan & Associates	Cloghvally Lower, Carrickmacross	358
<u>MN-C22-MCDP-44</u>	B & C Contractors (Glassford Developments Ltd) c/o Ken Lonergan & Associates	Nafarty, Carrickmacross	359
<u>MN-C22-MCDP-46</u>	Michael McEvoy c/o Ken Lonergan & Associates	Lisanisk, Carrickmacross	360
<u>MN-C22-MCDP-47</u>	Kenneth Lonergan c/o Ken Lonergan & Associates	Naffarty, Carrickmacross	361
<u>MN-C22-MCDP-75</u>	Duffy Family c/o Steven Peck Planning	Lisanisk, Carrickmacross	363
<u>MN-C22-MCDP-80</u>	Inver College		370
<u>MN-C22-MCDP-83</u>	Clarlan Limited c/o Hughes Planning and Development Consultants	Lands at Carrickmacross	371
<u>MN-C22-MCDP-100</u>	Michael McMahon, Barry McCourt and Thomas Kelly c/o Stephen Ward Town Planning	Lands at Mullanarry, Carrickmacross, County Monaghan.	381
<u>MN-C22-MCDP-103</u>	Park Edge Contracting Ltd c/o Stephen Ward Town Planning	Coill an Ri, Carrickmacross, Co. Monaghan	388
<u>MN-C22-MCDP-107</u>	Pat McNally	Lands at Castleblayney Road, Carrickmacross	391
<u>MN-C22-MCDP-112</u>	Ardee and Drumconrath Road Residents c/o Tony Ewbanks	Drumconrath Road, Carrickmacross	392

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-15</u>	Donagh and Siobhan Goulding	Lands at Nafarty, Carrickmacross	N/A

Summary of Submission & Issues Raised

The submission requests the Council reconsider the location of the Indicative New Road Proposals – Inner Link Road and the inappropriate Industry, Enterprise, Employment Zoning of Land in the area.

Indicative New Road Proposals – Inner Link Road

- Monaghan County Council is requested to reconsider the (location of the) proposed inner link road between the R178 Shercock Road and the R180 Ballybay Road/Castleblayney Road (N2)
- It is stated that a key objective of this road is ***“to relieve traffic congestion and divert through traffic, particularly commercial traffic and heavy goods vehicles, from residential areas”***.
- However, as the Ballybay Road (R180) side of this proposed road is predominantly residential this is in direct contravention with the proposed objective of the road
- There are currently seventy-five (75) homes including 33 at Corr An Tobair, 41 at Tobair Na Carraig, and another 15-20 homes in the vicinity of the roundabout on the Ballybay Road.
- Such a link road will drive road traffic including commercial and heavy goods vehicles into this existing residential area.
- This road is unsuitable for such *commercial traffic and heavy goods vehicles* and this view was upheld by Monaghan County Council Planning who refused planning permission under ref 21/19

Zoning of Land as Industry, Enterprise, Employment

- Monaghan County Council is requested to reconsider the zoning of land in this area as Industry/Enterprise/Employment, which is inappropriate, given that;
 - The zoned Industrial land is essentially landlocked to industry. The only access to it is either through a residential area (Corr An Tobair and Tobair Na Carraig) or via the unsuitable single-carriage laneway from the Ballybay Road. Please refer to Planning ref 21/19 where Monaghan County Council Planning stated their concerns regarding access to a proposed industrial complex through the residential estate of Corr an Tobair or via the single path laneway from the Ballybay Road
 - The zoned Industrial land is sandwiched between existing housing, farmland, the Corr an Tobair and Tobair Na Carraig estates), the Nafferty Fen and Water Source (Landscape Protection/Conservation, Community Services/Facilities zone) and the Carrick Emmets GAA club (Recreation/Amenity area). We understand that industry and employment are needed in the area however, there is other land zoned “industrial” in Carrickmacross that is not beside homes or a Proposed Natural Heritage Area and Aquifer for the town. Since this land was first zoned industrial in 2019 no industrial or commercial enterprise has been built on it.
 - Reference to Refusal reason under MCC Ref No. 21/19

Chief Executive Response

The submission requests the Council reconsider the location of the Indicative New Road Proposals – Inner Link Road and the inappropriate Industry, Enterprise, Employment Zoning of Land in the area.

The subject lands are located to the north-west of Carrickmacross and outside the settlement envelope.

The submission cites concerns about a proposed new link road in Carrickmacross. The results of the planned Carrickmacross Local Transport Plan will inform the need for the road. The proposed project will be required to progress through a phased design process which will not commence until funding becomes available. The design process will involve a feasibility study, constraints, environmental evaluation, design, consideration of how this proposed link road will interact with or affect other objectives of the County Development Plan, including active travel, road safety and urban regeneration as well as public consultation and stakeholder engagement. No amendment to the Draft Development Plan is proposed as in respect of this request in so far as it relates to the proposed road.

Carrickmacross has a sufficient quantum of land zoned Industry, Enterprise, Employment determined on a number of factors including the developed and undeveloped lands, uptake of current zoned land, planning and environmental considerations, such as topography, developable area, flooding, sequential test, accessibility and jobs ratio. These key considerations influence both the quantum of lands proposed to be zoned, and the locations of same, within the County Development Plan 2025-2031. The subject lands do not have direct access onto the road and are less favourable from a sequential approach to the zoning of Industry, Enterprise, Employment land. On this basis, it is recommended that the land zoned Industry, Enterprise, Employment be removed from the settlement envelope and said envelope be amended to reflect the removal of zoned lands.

Chief Executive Recommendations

- No amendment recommended to the location of the Indicative New Road Proposal
- Remove the lands zoned 'Industry, Enterprise, Employment' and amend the settlement envelope.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-16</u>	Con and Kay Goulding	Lands at Nafarty, Carrickmacross	36

Summary of Submission & Issues Raised

The submission requests the Council reconsider the location of the Indicative New Road Proposals – Inner Link Road and rezone the lands to Residential.

Indicative New Road Proposals – Inner Link Road

- Monaghan County Council is requested to reconsider the (location of the) proposed inner link road between the R178 Shercock Road and the R180 Ballybay Road/Castleblayney Road (N2)
- It is stated that a key objective of this road is **“to relieve traffic congestion and divert through traffic, particularly commercial traffic and heavy goods vehicles, from residential areas”**.
- However, as the Ballybay Road (R180) side of this proposed road is predominantly residential this is in direct contravention with the proposed objective of the road
- There are currently seventy-five (75) homes including 33 at Corr An Tobair, 41 at Tobair Na Carraig, and another 15-20 homes in the vicinity of the roundabout on the Ballybay Road.
- Such a link road will drive road traffic including commercial and heavy goods vehicles into this existing residential area.
- This road is unsuitable for such *commercial traffic and heavy goods vehicles* and this view was upheld by Monaghan County Council Planning who refused planning permission under ref 21/19.

Zoning of Land

- Monaghan County Council is requested to re-zone the applicants lands to residential
- Subject land was previously zoned as residential under development plan 2007-2013 when like now there was a demand for housing
- The following services are currently available on or adjacent to subject land with easy access to them, provided under planning ref. 08/1185:
 - road
 - sewer/foul water to the public mains
 - Uisce Éireann water supply
 - Electricity supply
 - Gas supply
 - Telecoms connections
- Subject land is in very close proximity to Carrickmacross town. It is only a only a short walk to two secondary schools, shops, recreation/amenity (Carrick Emmets GAA and Carrick Rovers soccer pitch), employment (Carrickmacross Industrial Estate and N2 Business Park (Castleblayney Road))
- There is a right of way leading from subject land towards the town. Should Monaghan County Council consider opening this access, it would significantly shorten the pedestrian access to the town, shops, school, employment, etc.
- This area of Nafarty is an expanding residential area with Corr an Tobair (33 homes) and more recently Tobair an Carraig (41 homes) having been completed and occupied
- The re-zoning of subject land would be similar to the proposed re-zoning of land on the Ballybay Road which includes a commercial premises and recreational football pitch. These had been previously zoned industrial and but are now to be zoned residential. This land, like the subject lands, is adjacent to another residential area.

Community Services/Facilities Area

- Monaghan County Council is requested to re-zone the area marked Community Services/Facilities on subject land to be zoned as residential
- The extent of this zoned area, which has become larger over consecutive development plans, is unnecessary and its purpose is unclear
- The entire burden of this zoned area is on subject land and it is inexplicable as to why such a zone (if necessary at all) is not extended in a circular fashion to encompass all surrounding properties.
- Although there is a wayleave on a small portion of subject land, the right of way access to the well/pump house is via the single path to Carrickmacross Industrial Park (marked with an X on the above map).

Recreation/Amenity Area

- Monaghan County Council is requested to re-zone the area marked Recreation/Amenity on subject land to be zoned as residential

Chief Executive Response

The submission requests the Council reconsider the location of the Indicative New Road Proposals – Inner Link Road and rezone the lands to Residential.

The subject lands are located to the north-west of Carrickmacross and are within the settlement envelope and the speed limit. The submission lands have 3 zonings pertaining including part Industry, Enterprise, Employment, part Community Services/Facilities and part Recreation/Amenity and include an indicative new road proposal on said lands.

The submission cites concerns about a proposed new link road in Carrickmacross. The results of the planned Carrickmacross Local Transport Plan will inform the need for the road. The proposed project will be required to progress through a phased design process which will not commence until funding becomes available. The design process will involve a feasibility study, constraints, environmental evaluation, design, consideration of how this proposed link road will interact with or affect other objectives of the County Development Plan, including active travel, road safety and urban regeneration as well as public consultation and stakeholder engagement. No amendment to the Draft Development Plan is proposed in respect of this request in so far as it relates to the proposed road.

The submission requests that all the lands be rezoned as Residential. The Core Strategy of the Draft Development Plan recognises the role of settlements in driving the development of the County and identifies the scope of development possible for the County, while remaining consistent with National and Regional policy. It also identifies the quantum and location of development for the plan period, consistent with the population targets and settlement hierarchy that reflects the availability of existing services, planned investment, sequential development and environmental requirements.

Whilst the lands have some services, they have been identified as Tier 2 lands that are not currently sufficiently serviced. Additionally, the subject lands are located on the north-western edge of Carrickmacross settlement envelope and the rezoning of the lands would therefore not contribute to the compact growth of the town. Furthermore, there are sufficient lands located within the existing settlement footprint of Carrickmacross Town which are more suitable for residential development in sequentially more appropriate locations to meet the projected population increase over the plan period. Based on the above, the rezoning of these submission lands to Residential is not appropriate in this instance.

Carrickmacross has a sufficient quantum of land zoned Industry, Enterprise, Employment determined on a number of factors including both developed and undeveloped lands, the uptake of current zoned

land, planning and environmental considerations, such as topography, developable area, flooding, sequential test, accessibility and jobs ratio. These key considerations influence both the quantum of lands proposed to be zoned, and the locations of same, within the County Development Plan 2025-2031. The Industry, Enterprise, Employment parcel are Tier 2 lands and are located within the edge of the settlement envelope. The lands are accessed off a route which passes through a housing development potentially risking impacts to residential amenity.

To conclude, it is recommended that the indicative road proposal and those lands zoned as 'Community Services/Facilities' and 'Recreation/Amenity' be retained.

It is also recommended that the lands zoned part 'Industry, Enterprise, Employment' in the Draft Development Plan be removed and the settlement envelope be amended accordingly.

Chief Executive Recommendations

- No amendment recommended.
- Remove the lands zoned 'Industry, Enterprise, Employment' and amend the settlement envelope.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-34</u>	Revilo Properties Ltd. c/o SCA Planning & Development Consultants	1 Kingscourt Road, Carrickmacross	37

Summary of Submission & Issues Raised

- This submission relates to the zoning of the subject lands as 'Existing Commercial' and requests that the zoning be changed to 'Existing Residential'.
- Submits that this would more accurately reflect the existing and long-established use on the site.
- The submission makes reference to the Compact Settlement Guidelines which were introduced in January 2024. The guidelines support the creation of compact settlements and redevelopment of underutilised urban land, which is applicable to the subject lands.
- The subject lands are zoned existing commercial.
- Submission notes that within the MCDP that the *principal permitted use shall be related to the existing established commercial use on site. The redevelopment and expansion of existing commercial lands may be permitted.*
- It is submitted that the Existing Commercial zoning on the site is inappropriate and does not reflect that the site currently comprises a residential dwelling and associated shed. The lands are vacant and 'brownfield'.
- Commercial use would be non-conforming with the surrounding residential zoning and the established pattern of terraced residential development.
- There is no current commercial activity on this part of the Kingscourt Road and therefore, existing residential is the predominant surrounding land use.
- Submission refers to Carrickmacross being identified as a Tier 2 Strategic Town within the draft Development Plan's Settlement Hierarchy, that will be promoted in driving growth and economic development in the south of County Monaghan.
- Current Government Policy promotes residential development in town centres, promotes the re-use for residential development of brownfield town centre sites and the redevelopment of underutilised, serviced urban land for residential purposes.
- Carrickmacross has experienced the highest level of population growth compared to the other towns in Monaghan (referring to the KPMG Housing Need and Demand Assessment). This demonstrates a clear need for maintaining and utilising existing residential sites within the town to provide accommodation for the expanding population.
- Submission refers to recent activity on the site, including a notice of intention to place the site on the Derelict Sites Register being served in May 2024, however this was postponed due to a planning application being determined at the same time.
- The owners of the site intend to develop it for residential purposes but have been prevented from doing so principally due to the existing commercial zoning being incorrect and unsuitable.
- Planning Reference 24/60169 sought planning permission for the construction of semi-detached dwelling and 2 no. apartments on the subject site. The first reason for refusal was that the development as proposed would (i) contravene the designated land use zoning of the MCDP 2019-2025.
- It was clearly indicated in the public notices and plans of the existing buildings on the site that there was a residential dwelling to be demolished as part of the application. It was also acknowledged in the Planning Officers Report that *the existing to-be-demolished buildings appear to be garages linked with an unoccupied house.*
- Submits there is a clear consensus that there is an existing residential dwelling on the lands and therefore, the designated zoning, the reason therefore and the indicated acceptable landuse development, as 'Existing Commercial', is incorrect.

- The site is underutilised, brownfield and has been vacant for 6+ years. However, as confirmed in the High Court judgement in Dromapop v Leitrim County Council (IEHC 233 2024) a very long-established land use is not lost by vacancy alone.
- The location, on the junction of the Kingscourt and Maghercross Road is unsuitable for any commercial activity. The required sightlines cannot be achieved on the subject lands and the principle of a development with no vehicular access of car parking was accepted under Planning Ref 24/60169.
- Given the location, any commercial activity on the site would require vehicular access or carparking, which cannot be provided.
- A commercial development at this location would be non-conforming with the nature and pattern of development in the vicinity.

Summary

- The existing and established use is residential.
- Carrickmacross is an expanding town and underutilised town centre lands should be used to provide residential accommodation, in accordance with Government Policy.
- The site requires redevelopment as it is being considered for the Derelict Sites Register and the current zoning is preventing redevelopment for residential purposes.
- The location is unsuitable for future commercial development, which would be non-conforming with the established and adjoining use – residential use.
- A compact town centre residential redevelopment with no car parking would be suitable on the site and this should be facilitated by appropriate zoning.

Conclusion

With the passing of the new Planning Act, which has been signed into law by the President, the next Monaghan County Development Plan will likely have a duration of 10-years, so the case for timely rectifying the current zoning to support town centre residential development is clearly in accordance with the proper planning and sustainable development of the land and Government and Regional policy.

Chief Executive Consideration

The subject lands, although currently vacant, comprise a number of commercial type buildings/outbuildings. The Land Use Zoning Objective for Existing Commercial (LUO 7) is to 'provide for established commercial development and facilitate its appropriate expansion. The principal permitted use shall be related to the existing established commercial use on site. The redevelopment and expansion of existing commercial lands may be permitted'. Given the current buildings in situ, and the established use of the subject lands, it is considered appropriate that they remain as Existing Commercial and support land use zoning objective LUO 7.

Chief Executive Recommendation

No amendment recommended.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-36</u>	Aiden Daly c/o Kenneth D. Lonergan & Associates Ltd.	Naffarty, Carrickmacross	38

Summary of Submission & Issues Raised

- The plot lies adjacent to the development envelope of Carrickmacross on the north side of the town.
- It is served by suitable public paths, roads and all public utilities with adequate capacity in the collection network adjacent to the plot.
- There is no requirement for third party consent to access the property.
- The plot is adjacent to a high residential zoned plot recently completed and occupied.
- The plot is elevated from the public road and more suitable to residential than industrial/employment due to the topography of the site.
- The plot lies close to an extensive campus of recreational and educational amenities and it is not on a flood risk area.
- The owners are offering the plot to Housing Developers that can deliver a suitable high-end design and completed development for the benefit of the end user and promote an expanding community with easy access to the main N2 national road and other regional road networks.
- To promote continual high spec development in a suitable location request that the plot is zoned high density housing.

Chief Executive Consideration

The settlement hierarchy set out in the draft Monaghan County Development Plan designates Carrickmacross as a Tier 2 settlement – Strategic Town.

The Core Strategy of the County Development Plan recognises the role of settlements in driving the development of the County and identifies the scope of development possible for the County, while remaining consistent with National and Regional policy. It also identifies the quantum and location of development for the plan period, consistent with the population targets and settlement hierarchy that reflects the availability of existing services, planned investment, sequential development and environmental requirements.

The subject lands are located on the periphery of Carrickmacross Town, 1.5km north west of the town centre, outside of the settlement envelope, and the rezoning of the lands would therefore not contribute to the compact growth of the town. Additionally, there are sufficient lands located within the existing settlement footprint of Carrickmacross Town which are suitable for residential development in more sequentially appropriate locations to meet the projected population increase over the plan period.

Chief Executive Recommendation

No amendment recommended.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-38</u>	Ronan Casey	N/A	N/A

Summary of Submission & Issues Raised

This submission relates to the proposed link roads for Carrickmacross.

- There are 2 link roads for the Carrickmacross area referenced in the draft Monaghan County Development Plan 2025-2031.
- The same link roads were also proposed in the 2019-2025 and 2013-2019 Monaghan County Development Plans.
- Planning permission was granted for residential development (Application Reference Number's 19/571, 20/530, 19/160, 19/159) after implementation of the 2013-2019 development plan, and construction completed over the proposed link road routes.

Submission requests:

- Can the 2025-2031 Development Plan clarify if the proposed link road routes remain viable given these recent developments.
- If so, can the plan contain measures to prevent further private development onto the proposed routes; and
- If not, can the plan provide a link road route which is actually viable.

It is irresponsible to continue to allow the current high volume of HGV traffic driving at speed on the Castleblayney Road, with 2 schools in close proximity and crossing requirements for kids to the Carrick Emmets/ Carrick Rovers playing fields on the Ballybay Road.

This stretch of road is extremely dangerous for pedestrians, residents and road users, and a link road is urgently required to mitigate the risks in this area.

The submission includes extracts from the Draft Monaghan County Development Plan and current and previous Development Plans:

- Section 11.8 Roads and Traffic Management Monaghan County Development Plan 2025-2031
- Section 11.8 Roads and Traffic Management, Monaghan County Development Plan 2019-2025
- Section 10.9.1 Roads and Traffic Management Monaghan County Development Plan 2013-2019

Chief Executive Response

The comments raised in this submission relate to an indicative road scheme as shown on Map CKDP 1 and questions their viability and status. The Draft County Development Plan 2025-2031 identifies that *“these new potential links will be subject to options selection, detailed design and will be taken through the relevant consent procedures, as such, these indicative lines represent the centre line of a 100-metre-wide preliminary corridor”*.

Chapter 11 of the Draft Development Plan, ‘Carrickmacross Town Settlement Plan’, includes objectives specific to roads and traffic management. Particularly relevant to this submission is CMO 7 ‘undertake feasibility and viability studies regarding the options for potential relief roads around Carrickmacross Town, to include a review of the congestion at the junction of the Kingscourt Road and Dundalk Road, during the lifetime of this plan’ and CMO 8 ‘To protect, design and develop new road and road upgrade projects identified during the lifetime of this plan’.

Monaghan County Council Road Design Section confirmed that, they are currently of the opinion that, the proposed roads are required to remove traffic from the town centre, facilitate active travel and the re-allocation of road space, and to facilitate the growth and development of the town. The results on the planned Carrickmacross Local Transport Plan will inform the need for such roads. The proposed road projects will be required to progress through a phased design process, which will involve a feasibility study, constraints, environmental evaluation and design. Public consultation and stakeholder engagement will be a part of this process. Proposals will also need to consider how this proposed link road will interact with or affect other objectives of the CDP, including active travel, road safety and urban regeneration.

Their inclusion in the County Development Plan is important to safeguard their future design and delivery, which will be undertaken when funding and resources allow.

Chief Executive Recommendation

No amendment recommended.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-39</u>	Eakin Developments Ltd c/o Kenneth D. Lonergan and Associates Ltd.	Drummond Otra, Dundalk Road, Carrickmacross	39

Summary of Submission & Issues Raised

- The submission requests that the subject lands are rezoned from ‘Strategic Residential Reserve’ to High Density Residential.
- The subject lands lie within the settlement envelope of Carrickmacross, to the south of the town.
- The subject lands are suitably serviced by public utilities (footpaths and roads). There is adequate capacity in the network to accommodate development without the need for third party consent.
- The subject lands are adjacent to a high-density residential development which has been fully completed and lie closer to the town centre than the adjoining residential scheme. It would be sequentially suitable to zone for high density residential development.
- The subject lands are elevated from the public road and are suitable for residential development because of the topography of the site.
- The subject lands lie close to an extensive campus of recreational amenities such as Lisanisk Park, the athletics track, soccer fields as well as Convent Avenue. The site also has easy access to the main N2 national road and other regional road networks.
- The owners of the subject lands are experienced developers who can deliver a suitable, high-end design and completed development. The owners have already completed in excess of 200 dwellings in Carrickmacross and have a further 2 proposals within the planning system which they hope to commence in 2025 and complete in 2027. The owner is currently constructing 20 dwellings in the town centre which will be complete by Mid 2025.

Chief Executive Response

The submission requests that the subject lands are rezoned from ‘Strategic Residential Reserve’ to ‘High Density Residential’. It is assumed that in referring to High Density Residential the author is seeking a rezoning to ‘Proposed Residential A’.

The submission relates to an area of land referenced as CK13 on the Infrastructure Assessment which is deemed Tier 1 ‘Serviced Zoned Land’ in Appendix 16 of the Monaghan County Development Plan 2025-2031.

The Core Strategy of the County Development Plan recognises the role of settlements in driving the development of the County but also identifies the scope of development possible for the County, while remaining consistent with National and Regional policy. It also identifies the quantum and location of development for the plan period, consistent with the population targets and settlement hierarchy that reflects the availability of existing services, planned investment, sequential development and environmental requirements.

Whilst it is acknowledged that the lands have services available to them, there are sufficient lands located within the existing settlement footprint of Carrickmacross Town zoned for residential development to meet the projected population increase over the plan period.

Lands zoned as Strategic Residential Reserve within the five main towns of the County have been done so to facilitate the longer-term growth needs of the County. A number of landbanks of Strategic Residential Reserve have been removed from the settlement envelope of Carrickmacross Town as a result of the recommendation of The Office of the Planning Regulator due to their peripheral location. It is considered that as a result of the strategic location of the subject lands, within the built-up area and bounded by existing housing, the retention of the Strategic Residential Reserve zoning will support long term compact growth and will afford for potential development beyond this plan period. It is important therefore, that these lands are protected for the long term expansion of the Carrickmacross.

On this basis, the subject lands are most appropriately zoned 'Strategic Residential Reserve'.

Chief Executive Recommendation

No amendment recommended.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-40</u>	Glassford Developments Ltd c/o Kenneth D. Lonergan and Associates Ltd.	Magheross, Drumconrath Road, Carrickmacross	40

Summary of Submission & Issues Raised

- The submission requests that the subject lands are rezoned from ‘Industry/Enterprise and Employment’ to ‘High Density Residential’.
- The submission notes that the subject lands lie within the settlement envelope of Carrickmacross, to the south of the town and are suitably serviced by public utilities (footpaths and roads). It is also stated that there is adequate capacity in the network to accommodate development without the need for third party consent.
- The subject lands are adjacent to a land which are zoned as ‘Proposed Residential A’ and which are subject of a current planning application. The zoning of the subject lands would be sequentially suitable to be zoned for high density residential development.
- The inclusion of the subject lands for ‘Industry/Enterprise and Employment’ may cause issues due to their location and topography and would be more appropriately zoned as ‘High Density Residential’.
- The subject lands lie close to an extensive campus of recreational amenities such as, the athletics track, soccer fields as well as Convent Avenue with easy access to the main N2 national road and other regional road networks.
- The owners of the subject lands are experienced developers who can deliver a suitable, high-end design and completed development. The owners have already completed in excess of 150 dwellings in Carrickmacross and have 2 further housing developments at design stage which they hope to commence in 2025 and complete in 2027. The owner is currently constructing 58 dwellings in the town centre which will be complete by Mid 2025.
- The site is not at risk of flooding.

Chief Executive Response

The submission requests that the subject lands are rezoned from ‘Industry, Enterprise and Employment’ to ‘High Density Residential’. It is assumed that in referring to High Density Residential, the author is seeking a rezoning to ‘Proposed Residential A’.

The Core Strategy of the County Development Plan recognises the role of settlements in driving the development of the County but also identifies the scope of development possible for the County, while remaining consistent with National and Regional policy. It also identifies the quantum and location of development for the plan period, consistent with the population targets and settlement hierarchy that reflects the availability of existing services, planned investment, sequential development and environmental requirements. There are sufficient lands located within the existing settlement footprint of Carrickmacross Town which are considered more suitable for residential development, in more sequentially appropriate locations to meet the projected population increase over the plan period.

In recognition of its role in providing employment, housing and services for the south of the County, Carrickmacross is designated as a town with strategic potential on a regional scale in the Regional Spatial and Economic Strategy for the Northern and Western Regional Assembly Area. In this context it is of strategic economic importance that sufficient economic and employment lands are zoned for the town in spatially appropriate locations to ensure it can fulfil its economic role and continue to grow in a sustainable manner. Having regard to this, viable banks of zoned Industry, Enterprise and Employment lands are spatially distributed around the town. As such the most appropriate land use

zoning for these lands is 'Industry/Enterprise and Employment' which will further help to strength and develop the economic and employment base in Carrickmacross.

On this basis, the subject lands are most appropriately zoned 'Industry, Enterprise and Employment'.

Chief Executive Recommendation

No amendment recommended.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-41</u>	Glasford Developments Ltd c/o Kenneth D. Lonergan & Associates Ltd.	Magheross, Drumconrath Road, Carrickmacross	41

Summary of Submission & Issues Raised

- The plot lies outside of the settlement envelope of Carrickmacross Town/Urban Area on the south side of the town.
- It is serviced by suitable public paths, roads and all public utilities with adequate capacity in the collection network adjacent to the plot.
- There is no requirement for third party consent to access the property.
- The plot is adjacent to a proposed high residential zoned plot and adjacent to other individual residential properties on the south of the town.
- The plot is flat to the public road and more suitable to individual plots and low density residential due to the topography of the site.
- The plot lies close to an extensive campus of recreational and educational amenities such as athletic track, soccer fields and town parks.
- The owners are offering the plot to individual dwelling owners in a serviced site that will offer a much-needed housing stock in Carrickmacross. It would provide plots for individuals who may wish to design and construct individual design dwellings in a sustainable way to current high standard regulations.
- The owners are consistently asked to develop this site for single dwellings in individual plots.
- This site could be developed for one off dwellings in a serviced area and eliminate a need to locate outside the urban area of Carrickmacross.
- It may offer individuals to release existing housing stock in the town for others to enjoy.
- The site is on the road and path network for all schools, shops etc. with easy access to the main N2 national road and other regional road networks.
- To promote continual high spec development in a suitable location, request that the plot is zoned high density housing.

Chief Executive Consideration

This submission requests that the subject lands are included within the settlement envelope of Carrickmacross and zoned for 'high density housing' (Proposed Residential A).

The Core Strategy of the County Development Plan recognises the role of settlements in driving the development of the County and identifies the scope of development possible, while remaining consistent with National and Regional policy. It also identifies the quantum and location of development for the plan period, consistent with the population targets and settlement hierarchy that reflects the availability of existing services, planned investment, sequential development and environmental requirements.

Whilst it is acknowledged that the lands have services available to them, the subject lands are located on the periphery of Carrickmacross Town, outside the development limit, and the rezoning of the lands would therefore not contribute to the compact growth of the town. Additionally, there are sufficient lands located within the existing settlement footprint of Carrickmacross Town which are suitable for residential development in more sequentially appropriate locations to meet the projected population increase over the plan period.

Chief Executive Recommendation

No amendment recommended.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-42</u>	John Conlon c/o Kenneth D. Lonergan & associates ltd.	Mullanarry, Carrickmacross, Co. Monaghan	42

Summary of Submission & Issues Raised

- The plot lies within the development envelope of Carrickmacross.
- It is currently zoned agricultural from a recent decision by Monaghan County Council prior to the draft development plan mapping.
- The owner is actively involved in farming the plot as a pig farm with the adjacent property to the agricultural sheds and wishes to retain this use.
- The owner has no wish at present to have the property as residential, or in the future.
- Wishes that the Council will take on board the requests that the property is not yet suitable for housing, as long as the farm is active and viable entity.
- A previous application to have the property de-zoned under the RZLT application was approved.
- Requests that the plot is zoned as agricultural.

Chief Executive Consideration

The subject lands form part of a wider 'Strategic Residential Reserve' zoning, within the settlement envelope of Carrickmacross. The submission requests that the lands be rezoned to agriculture. It is noted that these lands were the subject of a de-zoning under Variation No.5 of the Monaghan County Development Plan 2019-2025.

The core strategy of the draft Monaghan County Development Plan sets out the quantum of lands required for residential development within Carrickmacross during the lifetime of the development plan, disaggregated across land use zonings 'Proposed Residential A', 'Proposed Residential B', and Town Centre. In addition, lands are zoned 'Strategic Residential Reserve' on the basis that they are considered strategic in location for future residential development. It is of particular note that the subject lands form a part of a wider Strategic Residential Reserve zoning. As such, the removal of the subject lands from this wider zoning would compromise the ability of these lands to be comprehensively developed in the future.

The subject lands are considered to form part of a parcel of lands which are strategic in location and importance for future of residential development within Carrickmacross. As such, their Strategic Residential Reserve zoning should remain.

To zone agriculture would potentially facilitate further agricultural development which may compromise future residential development in these and adjacent lands. Existing agricultural use can proceed as is without undue impacts.

Chief Executive Recommendation

No amendment recommended.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-43</u>	B & C Contractors Ltd (Glassford Developments Ltd.), c/o Kenneth D. Lonergan & Associates Ltd	Cloghally Lower, Carrickmacross	43

Summary of Submission & Issues Raised

- This submission relates to lands located at Cloghally Lower within the development envelope of Carrickmacross. The submission includes a zoning map and maps from the Property Registration Authority, with the subject lands marked P1 (Plot 1) on the zoning map accompanying the submission.
- The submission seeks the retention of the zoning of the subject lands for high density residential development. The follow reasons are outlined in support of the proposal:
 - Lands are serviced by suitable public paths, roads and all public utilities with adequate capacity in the collection network adjacent to the plot.
 - Lands are adjacent to a high residential zoned plot recently completed.
 - Subject lands are elevated from the public road and more suitable to residential development.
 - Subject lands are close to an extensive campus of recreational, educational and shopping and is not on a flood risk area.
 - The landowners are housing developers on a large scale throughout Ireland and can deliver a suitable high-end design and completed developments and promote an expanding community with easy access to the main N2 national road and other regional road networks.
 - The landowner has a proven record of delivering high spec residential estates from 2000 - to date on a continuous period with Carrickmacross. The owner has already completed in excess of 150 dwellings in Carrickmacross in various estates on the major roads approach to the town.
 - A further two estates are in the design process with a view to commence in 2025 and complete within the year 2027 hence the need to have additional lands rezoned for the dates between 2025 and 2032.
 - The owner is currently constructing 58 dwellings in the town centre which will be complete by Mid-2025.

Chief Executive Response

The Core Strategy of the County Development Plan recognises the role of settlements in driving the development of the County and identifies the scope of development possible for the County, while remaining consistent with National and Regional policy. It also identifies the quantum and location of development for the plan period, consistent with the population targets and settlement hierarchy that reflects the availability of existing services, planned investment, sequential development and environmental requirements.

The content of the submission is noted. The subject lands are zoned Proposed Residential A in the Draft Monaghan County Development Plan 2025 – 2031. The subject lands have good connectivity and access to services and amenity and the zoning of same contributes to the sequential development of land from the centre of the settlement outwards. The lands contribute to the quantum and location of residential development for the plan period, and it is recommended that the zoning is retained on the submission lands.

Chief Executive Recommendation

No amendment recommended.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-44</u>	B & C Contractors Ltd (Glassford Developments Ltd.), c/o Kenneth D. Lonergan & Associates Ltd	Nafarty, Carrickmacross	44

Summary of Submission & Issues Raised

- This submission relates to lands located at Nafarty within the development envelope of Carrickmacross. The submission includes a zoning map and maps from the Property Registration Authority, with the subject lands marked P2 (Plot 2) on the zoning map accompanying the submission.
- The submission seeks the retention of the zoning of the subject lands for high density residential development. The follow reasons are outlined in support of the proposal:
 - Lands are serviced by suitable public paths, roads and all public utilities with adequate capacity in the collection network adjacent to the plot.
 - Lands are adjacent to a high residential zoned plot currently under construction.
 - Subject plot is a brownfield site adjacent to public road, residential and recreation playing field.
 - Subject lands are close to educational area and shopping and is not on a flood risk area.
 - The landowners are housing developers on a large scale throughout Ireland and can deliver a suitable high-end design and completed developments and promote an expanding community with easy access to the main N2 national road and other regional road networks.
 - The landowner has a proven record of delivering high spec residential estates from 2000 - to date on a continuous period with Carrickmacross. The owner has already completed in excess of 150 dwellings in Carrickmacross in various estates on the major roads approach to the town.
 - A further two estates are in the design process with a view to commence in 2025 and complete within the year 2027 hence the need to have additional lands rezoned for the dates between 2025 and 2032.
 - The owner is currently constructing 58 dwellings in the town centre which will be complete by Mid-2025.

Chief Executive Response

The Core Strategy of the County Development Plan recognises the role of settlements in driving the development of the County and identifies the scope of development possible for the County, while remaining consistent with National and Regional policy. It also identifies the quantum and location of development for the plan period, consistent with the population targets and settlement hierarchy that reflects the availability of existing services, planned investment, sequential development and environmental requirements.

The content of the submission is noted. The subject lands are zoned Proposed Residential A in the Draft Monaghan County Development Plan 2025 – 2031. The subject lands have good connectivity and access to services and amenity and the zoning of same contributes to the sequential development of land from the centre of the settlement outwards. The lands contribute to the quantum and location of residential development for the plan period, and it is recommended that the zoning is retained on the submission lands.

Chief Executive Recommendation

No amendment recommended.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-46</u>	Michael McEvoy c/o Ken D. Lonergan and Associates Ltd.	Lisanisk, Carrickmacross	45

Summary of Submission & Issues Raised

- The submission requests that the subject lands are rezoned from ‘Strategic Residential Reserve’ to agriculture.
- The subject lands are currently zoned agriculture following a recent decision by Monaghan County Council with respect to the Residential Zoned Land Tax.
- The submission notes that the subject lands have no direct access to public services, footpath or access roads and access to the lands is via a small agricultural laneway.
- The submission states that the subject lands cannot be developed independently due to the development of the N2 bypass, supporting link roads and serving bridges etc

Consideration

The Submission requests that the subject lands are rezoned from ‘Strategic Residential Reserve’ to ‘Agriculture’. It is noted that these lands were the subject of a de-zoning under Variation No. 5 of the Monaghan County Development Plan 2019-2025.

Lands zoned as Strategic Residential Reserve within the five main towns of the County have been done so to facilitate the longer-term growth needs of the County. A number of landbanks of Strategic Residential Reserve have been removed from the settlement envelope of Carrickmacross Town as a result of the recommendation of The Office of the Planning Regulator due to their peripheral location. It is considered that as a result of the strategic location of the subject lands, within the built-up area, the retention of the Strategic Residential Reserve zoning will support long term compact growth and will afford for potential development beyond this plan period. It is important therefore that these lands are protected for the long term expansion of the Carrickmacross.

Additionally, to zone the subject lands as ‘agriculture’ would potentially facilitate further agricultural developments which may compromise future residential development on these and adjacent lands. Notably, the existing agricultural use can proceed without undue impacts.

On this basis, the subject lands are most appropriately zoned ‘Strategic Residential Reserve’.

Chief Executive Recommendation

No amendment recommended.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-47</u>	Kenneth Lonergan c/o Kenneth D. Lonergan & Associates Ltd.	Naffarty, Carrickmacross	46

Summary of Submission & Issues Raised

- The submission requests that the subject lands are rezoned from ‘Industry, Enterprise and Employment’ to ‘High Density Residential’.
- The subject lands are located within the settlement envelope of Carrickmacross on the Northern side of the town and are serviced by suitable public paths, roads with adequate capacity in the collection network adjacent to the plot
- The subject lands are located adjacent to a high-density residential development. It would be considered sequentially suitable to zone the subject lands for high density residential development.
- The current zoning as ‘Industry/Enterprise and Employment’ may be problematic as a result of the location and topography of the subject lands.
- The subject lands are located close to an extensive number of recreational amenities such as the local GAA playing field as well as educational secondary schools and other parks all accessible by public paths with suitable public lighting and road network.
- The submission notes that the owners of the subject lands can deliver a development which has access to the main N2 national road and other regional road networks.
- The submission notes that the owner of the subject lands has a proven record of delivering design and sign off on a range of high specification residential estates since 1992 in the three adjacent counties totalling over 550 dwellings of which over 360 are estate type dwellings in Carrickmacross alone. The development will contribute to the growth of the town.
- The owner of the subject lands recognises that Carrickmacross as a town is anchored to the regional centres of Dundalk and Drogheda as well as the national centre of Dublin and is aware that housing within the service area of Carrickmacross is critical for growth.

Chief Executive Response

The submission requests a rezoning of the subject lands from ‘Industry, Enterprise and Employment’ to ‘High Density Residential’. It is assumed that in referring to High Density Residential, the author is seeking a rezoning to ‘Proposed Residential A’.

The Core Strategy of the County Development Plan recognises the role of settlements in driving the development of the County but also identifies the scope of development possible for the County, while remaining consistent with National and Regional policy. It also identifies the quantum and location of development for the plan period, consistent with the population targets and settlement hierarchy that reflects the availability of existing services, planned investment, sequential development and environmental requirements.

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.

It is noted that an extant planning permission reference, 21/19 for the construction of an industrial/warehousing unit has been granted on adjoining lands to the north east of the subject lands. The inclusion of the subject lands for residential use may be prejudicial to development of the industrial lands to the north east.

Furthermore, having regard to the recently constructed residential development to the north of the subject lands, Tobair Na Carrig, it is considered that the development of the lands for 'Industry, Enterprise and Employment' purposes, is inappropriate and may have an impact on the amenity of the residents in the immediate vicinity.

Both developed and undeveloped lands have zoned as 'Industry, Enterprise, Employment' within the settlement envelope of Carrickmacross. This has been determined by a number of factors including the uptake of current zoned land, planning and environmental considerations, such as topography, developable area, flooding, sequential test, accessibility and jobs ration. These key considerations influence both the quantum of lands proposed to be zoned and the locations of same within the County Development Plan 2025-2031. It is considered therefore, that sufficient undeveloped land has been zoned Industry, Enterprise and Employment within the settlement envelope of Carrickmacross to accommodate job growth and provide for choice, variety and flexibility.

Chief Executive Recommendation

That the subject lands are de-zoned and the settlement envelope of Carrickmacross is revised accordingly.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-75</u>	Duffy Family c/o Stephen Peck Chartered Town Planner	Lisanisk, Carrickmacross	47

Summary of Submission & Issues Raised

- Submission relates to lands at Lisanisk, Carrickmacross.
- The subject land is currently zoned 'Strategic Residential Reserve'.
- This submission respectfully requests that the subject land is re-zoned from 'Strategic Residential Reserve' to the Development Plan land use zoning category 'Proposed Residential A'.
- In the event that Monaghan County Council declines to zone all or any part of the subject land 'Proposed Residential A', it is requested that any of the subject land not so zoned would be zoned 'Proposed Residential B'.

The planning justification for the foregoing is set out in the following sections:

1. County population projection and implications for calculating Proposed Residential A and Proposed Residential B zoning requirements in Carrickmacross.
 - Within the draft Development Plan, insufficient 'Proposed Residential A' and 'Proposed Residential B' zoning has been provided in Carrickmacross, due to a fundamental flaw in its method for calculating 'Proposed Residential A' and 'Proposed Residential B' zoning requirements, namely the projection of County Monaghan population by 2031 by extrapolation assuming the County's population growth continues at its 2016-2022 inter-census rate.
 - It is considered that this method of projecting county population is inconsistent with the National Planning Framework and the Development Plans Guidelines for Planning Authorities.
 - County Monaghan population instead, should be in line with population targets set out in the draft First Revision to the National Planning Framework, which is based in recent ESRI research set out within the ESRI's 2024 report 'Population projections, the flow of new households and structural housing demand'.
 - Section 2.3 of the draft First Revision to the National Planning Framework sets out that it will also be necessary to make provision for the higher in-migration scenario modelled within the aforementioned ESRI report. This identified that Ireland's population may reach 6.3 million people by 2040, i.e. 200,000 persons more than taken account of in the population targets set out in the draft First Revision to the National Planning Framework.
 - When a County Monaghan projected population growth figure based on the draft First Revision to the National Planning Framework population targets is used within the draft Development Plan method for calculating 'Proposed Residential A' and 'Proposed Residential B' zoning requirements in Carrickmacross, the result indicates that within the draft Development Plan there is a shortfall of 1.68 ha of Proposed Residential A zoning and 1.44 ha of Proposed Residential B zoning in Carrickmacross.
 - When a County Monaghan projected population growth figure based on the higher in-migration scenario modelled within the aforementioned ESRI report is used within the draft Development Plan method for calculating Proposed Residential A and Proposed Residential B zoning requirements in Carrickmacross, the result indicates that within the draft Development Plan there is a shortfall of 4.49 ha of 'Proposed Residential A' zoning and 3.85 ha of 'Proposed Residential B' zoning in Carrickmacross.
 - It is submitted that Monaghan County Council should increase the amount of 'Proposed Residential A' zoning and 'Proposed Residential B' zoning in Carrickmacross accordingly.

2. Summary of Draft Development Plan Method for Calculating Proposed Residential A and Proposed Residential B Zoning Requirements in Carrickmacross

The draft Development Plan method for calculating 'Proposed Residential A' and 'Proposed Residential B' zoning requirements in Carrickmacross during the plan period appears as follows in summary:

- The draft Development Plan projects County Monaghan population by 2031, by extrapolation assuming the County's population growth continues at its 2016-2022 inter-census rate. On this basis, a County Monaghan population of 71,516 persons by 2031 is projected, i.e. growth of 6,228 persons over its 2022 population.
- The draft Development Plan assigns portions of this projected population growth over 2022 levels to different tiers of settlements and the remaining rural area. Carrickmacross is assigned a projected target of 6,687 persons by 2031 (growth of 942 persons over its 2022 population), i.e. it is assigned 15.13% of total projected population growth in the County.
- 20% of this target growth of 942 persons is assigned to brownfield / infill / regeneration lands, leaving 80% (754 persons) assigned for greenfield lands.
- This population increase target of 754 persons to be accommodated on greenfield lands by 2031 is converted into a target number of greenfield housing units by dividing by a rate of 2.74 persons per unit, providing a target total of 275 no. greenfield units by 2031.
- To accommodate this 275 no. greenfield units by 2031, a housing land requirement of 23.18 ha is calculated, consisting of 12.48 ha earmarked at 18 units per ha average gross density, plus 10.7 ha earmarked at 10 units per ha average gross density.
- These area figures, consisting of 12.48 ha earmarked at 18 units per ha average gross density, plus 10.7 ha earmarked at 10 units per ha average gross density, appear as corresponding to the area totals of lands proposed to be zoned 'Proposed Residential A' and 'Proposed Residential B', respectively, within Carrickmacross.

Flaw in Method and Proposed Remedy

- Submission states that a fundamental flaw in this method is the projection of County Monaghan population by 2031 by extrapolation assuming the County's population growth continues at its 2016-2022 inter-census rate.
- Submission considers that this method of projecting county population is inconsistent with the National Planning Framework and the Development Plans Guidelines for Planning Authorities.
- Instead of this approach, it is submitted that County Monaghan population projections should be in line with population targets / set out in the draft First Revision to the National Planning Framework, which is based in recent ESRI research set out within the ESRI's 2024 report 'Population projections, the flow of new households and structural housing demand'.

Projecting County Monaghan Population based on Population Targets set out in the Draft First Revision to the National Planning Framework

- The draft First Revision to the National Planning Framework sets out future population targets over 2022 levels for the Northern and Western Regional Assembly Area (NWRA), of which County Monaghan forms part.
- The Draft First Revision to the National Planning Framework is based on recent demographic and econometric modelling undertaken by the ESRI, and its regional population targets represent a continuation of the long-running NPF policy for 'regional parity', which is considered as highly unlikely to change between the current draft and the finalised version when published.
- It is submitted that County Monaghan population projection should be in line with population targets set out in the draft First Revision to the National Planning Framework.

- Figure 2 (*reproduction of draft First Revision to the National Planning Framework Table 10.1 – National Planning Framework Phased Population Growth*) within the submission shows the first revision to the National Planning Framework future population targets over 2022 levels. The overall target is for population growth over 2022 levels of 150,000 persons by 2040, comprising 15% of the overall forecast population growth of the State. A larger proportion of this pop growth is targeted in the period to 2030 (approx 56.67%) than the subsequent period to 2040.
- If it is assumed that approximately 10% of the population growth targeted for the NWRA in the 10-year period 2030-2040 (i.e. growth of 6,500 persons) will occur during the year 2031, adding this to the 2030 population growth target for the NWRA, provides a 2031 pop growth target over 2022 levels for the NWRA of approximately 91,500 persons.
- Whilst the draft First Revision to the National Planning Framework does not set out population targets for specific counties, submission considers it reasonable to assume that the proportion of future overall NWRA population growth that County Monaghan will contribute will remain approximately the same as the proportion of the Region’s population growth it contributed during the 2016-2022 inter-census period, which was 7.72%.
- Applying this proportion of 7.72% for County Monaghan to the 2031 population growth figure over 2022 levels for the NWRA of approximately 91,500 persons set out above, provides a population growth figure by 2031 over 2022 levels for County Monaghan of approximately 7,064 persons. This is significantly higher than the projected growth within the same period of 6,228 persons set out in the draft Development Plan.

ESRI Higher In-Migration Scenario

- Submission again reemphasises that it is necessary to make provisions for the higher in-migration scenario within ESRI’s 2024 report ‘Population projections, the flow of new households and structural housing demand’.
- Assuming that 15% of this additional 200,000 person population growth would be targeted for the NWRA in line with NPF ‘regional parity’ population growth policy, and then assigning it to the years 2022-2031 in the way described in paragraph 2.8, and apportioning 7.72% of this growth to County Monaghan in the way described in paragraphs 2.9-2.10, provides, under this scenario, a population growth figure by 2031 over 2022 levels for County Monaghan of approximately 8,477 persons. This is significantly higher than the projected growth within the same period of 6,228 persons set out in the draft Development Plan.

Implications for Calculating Proposed Residential A and Proposed Residential B Zoning Requirements in Carrickmacross

- Submission includes Table 1: *Implications of the higher County Monaghan projected population growth figures discussed in the previous section for the calculation of Proposed Residential A and Proposed Residential A zoning requirements in Carrickmacross, using the same draft Development Plan method for calculating this as identified earlier in report.*

Submission highlights that Table 1 within the report sets out that:

- When using as a starting point the County Monaghan projected population growth figure based on the draft First Revision to the National Planning Framework population targets, within the draft Development Plan there is a shortfall of 1.68 ha of Proposed Residential A zoning and 1.44 ha of Proposed Residential B zoning in Carrickmacross; and
- When using as a starting point the County Monaghan projected population growth figure based on the higher in-migration scenario modelled within the aforementioned ESRI report, which the draft First Revision to the National Planning Framework sets out that it will also be necessary to make provision for, within the draft Development Plan there is a shortfall of 4.49

ha of Proposed Residential A zoning and 3.85 ha of Proposed Residential B zoning in Carrickmacross.

Conclusions

It is submitted that:

- Within the draft Development Plan, insufficient 'Proposed Residential A' and 'Proposed Residential B' zoning has been provided in Carrickmacross, due to a fundamental flaw in its method for calculating 'Proposed Residential A' and 'Proposed Residential B' zoning requirements, namely the projection of County Monaghan population by 2031 by extrapolation assuming the County's population growth continues at its 2016-2022 inter-census rate. It is considered that this method of projecting county population is inconsistent with the National Planning Framework and the Development Plans Guidelines for Planning Authorities.
- Instead of this approach, County Monaghan population projection should be in line with population targets set out in the draft First Revision to the National Planning Framework, which is based in recent ESRI research set out within the ESRI's 2024 report 'Population projections, the flow of new households and structural housing demand'.
- Further to this it is highlighted that Section 2.3 of the draft First Revision to the National Planning Framework sets out that it will also be necessary to make provision for the higher immigration scenario modelled within the aforementioned ESRI report. This identified that Ireland's population may reach 6.3 million people by 2040, i.e. 200,000 persons more than taken account of in the population targets set out in the draft First Revision to the National Planning Framework.
- When a County Monaghan projected population growth figure based on the draft First Revision to the National Planning Framework population targets is used within the draft Development Plan method for calculating 'Proposed Residential A' and 'Proposed Residential B' zoning requirements in Carrickmacross, the result indicates that within the draft Development Plan there is a shortfall of 1.68 ha of Proposed Residential A zoning and 1.44 ha of Proposed Residential B zoning in Carrickmacross.
- When a County Monaghan projected population growth figure based on the higher immigration scenario modelled within the aforementioned ESRI report is used within the draft Development Plan method for calculating 'Proposed Residential A' and 'Proposed Residential B' zoning requirement in Carrickmacross, the result indicates that within the draft Development Plan there is a shortfall of 4.49 ha of 'Proposed Residential A' zoning and 3.85 ha of 'Proposed Residential B' zoning in Carrickmacross.
- In view of the forgoing, it is submitted that Monaghan County Council should increase the amount of 'Proposed Residential A' zoning and 'Proposed Residential B' zoning in Carrickmacross accordingly.

Policy 'CAP' on Development on Proposed Residential B Zoned Land and Implications

- The draft Development Plan Core Strategy sets out a housing land requirement to cater for population growth assigned for greenfield lands in Carrickmacross during the plan period, consisting of 12.48 ha earmarked at 18 units per ha average gross density, plus 10.7 ha earmarked at 10 units per ha average gross density, appearing as corresponding to the draft Development Plan area totals of 'Proposed Residential A' and 'Proposed Residential B' zoned lands, respectively, within Carrickmacross.
- However, the draft Development Plan sets out within Section 15.8.8 that permission will only be granted for development on 'Proposed Residential B' lands where not more than 50% of all lands zoned as Proposed Residential B in the settlement have either been developed or have the benefit of extant planning permission.

- It is submitted that, due to this policy ‘cap’ on development on ‘Proposed Residential B’ lands, it is not possible for the draft Development Plan Proposed Residential B lands within Carrickmacross to accommodate all of population growth / housing allocated during the plan period to these lands in the draft Development Plan Core Strategy.
- It is considered that this is inconsistent with the Development Plans Guidelines for Planning Authorities.

It is submitted that due to this policy ‘cap’ on development on Proposed Residential B lands, within the draft Development Plan there is an effective shortfall of land zoning for greenfield housing in Carrickmacross, which would equate to a shortfall of approximately:

- 3.03 ha of Proposed Residential A zoned land, or 6.07 ha of Proposed Residential B zoned land – when a County Monaghan projected population growth figure based on the draft First Revision to the National Planning Framework population targets is used within the draft Development Plan method for calculating ‘Proposed Residential A’ and ‘Proposed Residential B’ zoning requirements in Carrickmacross; and
- 3.64 ha of Proposed Residential A zoned land, or 7.28 ha of ‘Proposed Residential B’ zoned land – when a County Monaghan projected population growth figure based on the higher in-migration scenario modelled within the ESRI’s 2024 report ‘Population projections, the flow of new households and structural housing demand’ is used within the draft Development Plan method for calculating ‘Proposed Residential A’ and ‘Proposed Residential B’ zoning requirements in Carrickmacross.

The draft First Revision to the National Planning Framework sets out that it will be necessary to make provision for the higher in-migration scenario modelled within the aforementioned ESRI report.

- It is submitted that Monaghan County Council should zone a further additional 3.64 ha of Proposed Residential A land in Carrickmacross, in order to compensate for the policy ‘cap’ on development on Proposed Residential B lands.
- This would thereby ensure that the Proposed Residential A and Proposed Residential B lands in Carrickmacross can accommodate all of population growth / housing allocated during the plan period to these lands in the Development Plan Core Strategy.

Request for Re-Zoning of Land at Lisanisk, Co Monaghan

The submission includes the following points in support of the rezoning request. This includes:

- Address Proposed Residential A Zoning Shortfall in Carrickmacross

Submission refers to points set out earlier in the submission relating to shortfalls of zoned land and flaws in the population projection.

- Infrastructure

The Infrastructure Assessment and Settlement Capacity Audit classifies the subject land as a Tier 1 site, for which all relevant forms of infrastructure are available.

- Sustainable Planning Criteria (Settlement Capacity Audit)

Infrastructure Assessment and Settlement Capacity Audit identifies the subject land as meeting criteria for ‘Location (within 10- 15 walk of Town Centre / 1-1.5km)’ and ‘Compact Growth – brownfield / infill / rounding off’.

- **Public Transport**

It is highlighted that the subject land is in close proximity to a bus stop (approximately 40 metres south of the subject land) served by a number of bus routes. Thus, it is submitted that the subject land benefits from very good levels of public transport connectivity in the context of the local area.

- **Flood Risk**

The Strategic Flood Risk Assessment accompanying the draft Development Plan does not indicate that the subject land is at risk of flooding from any sources.

- **Availability for Development during the Plan Period**

The published draft Development Plan documents contain no information in respect of the availability of lands for development during the plan period (e.g. whether respective landowners have recently confirmed their lands to be available for development and free from legal impediment to development) during the plan period. Without such analysis there is no basis to conclude that the various lands identified within the draft Development Plan for residential development within the plan period are all in fact developable within the plan period. Subject lands would perform favourably in availability terms.

It is respectfully requested that Monaghan County Council re-zones the subject lands, from 'Strategic Residential Reserve' to 'Proposed Residential A'. In the event that Monaghan County Council declines to zone all or any part of the subject land 'Proposed Residential B'. In this regard it is submitted that this submission demonstrates that within the Draft Development Plan there is a shortfall of 'Proposed Residential B' zoning within Carrickmacross which zoning the subject lands could address / assist in addressing.

Chief Executive Response

The submission includes a rezoning request and includes comments/observations on the proposed housing allocation for Carrickmacross, and associated population projections.

The submission requests that the subject lands are rezoned to Proposed Residential A, in the first instance, or if not Proposed Residential A, are zoned as Proposed Residential B.

The Core Strategy of the County Development Plan recognises the role of settlements in driving the development of the County and identifies the scope of development possible for the County, while remaining consistent with National and Regional policy. It also identifies the quantum and location of development for the plan period, consistent with the population targets and settlement hierarchy that reflects the availability of existing services, planned investment, sequential development and environmental requirements. In response to the OPR submission, MN-C22-, CDP-126, recommendations R(ii) and R(iii), the population projections in the Core Strategy have been reviewed having regard to the Housing Supply Target Table to address population growth over the plan-period in accordance with the Housing Supply Target Methodology and the approach set out at section 4.3.1. of the Development Plans Guidelines.

Whilst it is acknowledged that the lands have services available to them, the subject lands are located on the periphery of Carrickmacross Town, and the rezoning of the lands would therefore not contribute to the compact growth of the town. Additionally, there are sufficient lands located within the existing settlement footprint of Carrickmacross Town which are more suitable for residential development in more sequentially appropriate locations to meet the projected population increase over the plan period

The subject lands are considered to form part of a parcel of lands which are strategic in location and importance for future of residential development within Carrickmacross, as such, their Strategic Residential Reserve zoning should remain.

The submission refers to section 15.8.8 of the Draft Development Plan. In response to the OPR submission, MN-C22-, CDP-126, this stipulation has been removed.

Chief Executive Recommendation

No amendment recommended.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-80</u>	Inver College	Location close to Inver College, Carrickmacross	N/A

Summary of Submission & Issues Raised

Request to consider the rezoning of lands close to Inver College from Industrial to Community, in the event that Inver College continues to grow at the current expansion rate.

No specific lands identified.

Chief Executive Response

There are a number of parcels of land adjacent to Inver College which are zoned 'Industry, Enterprise and Employment' (IE). It is not stated within the submission, which IE lands the submission refers to.

A significant portion of IE land to the north-east has been developed following planning permission being granted, or benefit from extant planning permissions (Ref No.23/60049 & 22/144). Therefore, these lands have a committed use and cannot be rezoned for 'Community Services / Facilities'. A smaller portion of lands to the east of Inver College have not been the subject of any planning applications but facilitate the expansion of existing industrial development site.

Chief Executive Recommendation

No amendment recommended.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-83</u>	Clarlan Limited c/o Hughes Planning & Development Consultant	Lands at Carrickmacross	48 & 49

Summary of Submission & Issues Raised

The submission requests the rezoning of lands and the extension of the Carrickmacross settlement envelope as follows:

- Site A: Rezone lands from ‘Proposed Residential B’ to ‘Existing Commercial’ (Lands at Dundalk Road, behind O’Connors Hardware)
- Site B: Extend ‘Proposed Residential B’ up to Old Castleblaney Road.

Introduction

In summary, this submission requests that Monaghan County Council consider the following:

- *That Site A of the submission lands zoned ‘Proposed Residential B’ under the Draft Monaghan County Development Plan 2025-2031 be rezoned to ‘Existing Commercial’;*

And

- *That ‘Proposed Residential B’ land use zoning for Site B of the submission lands be extended up to Old Castleblaney Road.*

- The landholdings to which this report pertains is located within the town of Carrickmacross, in County Monaghan. Carrickmacross is a thriving market town, and the second-largest town in the County.
- The request is made on the basis that Site A comprises existing commercial development and as such a commercial zoning is more representative of the existing site conditions and future use of the lands. It is proposed to offset this residential zoning to lands within our clients ownership to the north of Carrickmacross.
- The majority of Site B is already zoned ‘Proposed Residential B’. However, in order to facilitate development of these lands it is requested to extend the residential zoning to Old Castleblaney Road. This will facilitate access to this parcel of land and the development of this zoned and serviced landbank to deliver high quality residential development.
- It is considered appropriate and in accordance with the principles of proper planning and sustainable development, to rezone Site A of the submission lands from the existing ‘Proposed Residential B’ to ‘Existing Commercial’ land use zoning, and in lieu of this rezoning, Site B of the submission lands under ‘Proposed Residential B’ land use zoning be extended. We request that the recommendations of this submission be given full consideration in preparation for the forthcoming Draft Monaghan County Development Plan 2025-2031.

Site A- Lands at Dundalk Road, behind O’Connors Hardware

Comparison of Recent, Draft and Suggested Zoning Maps

- Upon review of both the zoning map contained within the current Monaghan County Development Plan 2019-2025 (Figure 2.0) and the zoning map contained within the Draft Monaghan County Development Plan 2025-2031 as presented for public submission (Figure 3.0), it is noted that Site A has retained its ‘Proposed Residential B’ land use zoning designation.
- This submission gives justification for the rezoning of the site from ‘Proposed Residential B’ to ‘Existing Commercial’
- The subject land is located within the environs of Carrickmacross, the second-largest town in County Monaghan, bordered by the N2 national motorway. Carrickmacross has a population of c. 6000 as per the 2022 census

- The site lies behind an existing commercial development, and part of the lands under the client's ownership is currently in use as storage for the commercial development. It is approximately 500m away from the periphery of the Carrickmacross Town Centre, and is well-connected, easily accessible, and well-serviced with infrastructure, facilities and amenities.
- At present, most of the site is underutilised as a greenfield site, while the surrounding context of the site includes a mix of industry and commercial businesses, along with residential developments, community facilities, and is bordered on the east by the Lisanisk Lake and its environs, marked under 'Landscape Protection/Conservation' land use zoning. As the site is surrounded by an established pattern of industrial and commercial businesses, we submit that rezoning the site from 'Proposed Residential B' to 'Existing Commercial' will expand on the opportunities for commercial use, and support Carrickmacross's identity as a market town in County Monaghan.
- It is noted that while we propose for a rezoning of 'Proposed Residential B' lands to 'Existing Commercial', we submit that this reduction in residential land use can be offset by extending lands at Cloughvalley Lower in the north of Carrickmacross zoned 'Proposed Residential B', also under the ownership of our client. This proposal has been discussed in further detail in Section 3.0 of this report.

Submission Lands

- The submission land is a greenfield site, with a small portion to the front of the site currently in use as storage for a commercial facility. It extends to approximately 1 hectare in area and is located directly behind O'Connor's Hardware on Dundalk Road (R178). Access to the site can only be gained through O'Connor's Hardware, just off Dundalk Road. Its location offers acceptable levels of road visibility and access, beneficial for any future commercial development.
- The landscape within the site is largely plain, and predominantly an unmanaged grassland with mature hedgerows and some scattered trees marking the boundary lines. The site's surrounding context includes existing light industrial and commercial uses along the R178, and a few established residential developments enclosing its northern and eastern peripheries. To the south, the site is adjacent to an abundance of natural green spaces, that extends toward Lisanisk Lake, creating a buffer of mature vegetation between the site and open water.
- The submission lands are situated approximately 500m from the periphery of Carrickmacross Town Centre, benefiting from proximity to essential services, local amenities, and accessible infrastructure within Carrickmacross. The town and its surrounding environs are notably well-suited to private-vehicle use, with an efficient road network facilitating connectivity to both local and regional destinations, such as Dublin, Galway, and Letterkenny in Ireland and Belfast and Derry in Northern Ireland.
- Public transportation to the site is provided via the South Bypass bus stop, located within a 10-minute walking distance of the site. This stop serves the Bus Éireann Expressway No. 32 and TFI Local Link Route 170, linking Carrickmacross to Cavan.
- Given the proximity to the town centre, and existing established commercial use on the site, it is considered appropriate to rezone the submission land from 'Proposed Residential B' to 'Existing Commercial'. The site's strategic location along R178, and singular access point via an existing commercial development (O'Connor's Hardware) concludes that the rezoning the site for commercial use will maximise the site's potential and support local economic growth.
- It can be noted that lands to the immediate south-east of the site have been zoned for 'Existing Commercial' use, and therefore we would argue that our client's site is of an appropriate and similar scale and nature, to accommodate valuable commercial development.

Planning Context of the subject land- MCDP 2019-2025

- Noting both the objective and vision for lands subject to the ‘Proposed Residential B’ zoning designation, in conjunction with the location of such lands on the Monaghan County Development Plan 2019-2025 zoning map, it is clear that such lands represent lands which are slightly more peripheral and, as such, are suitable for low-density forms of residential development.

Draft MCDP 2025-2031

- Under the Draft Monaghan County Development Plan 2025-2031, the submission site has been retained under ‘Proposed Residential B’ land use zoning
- It is understood, having regard for the vision for ‘Existing Commercial’ land use zoning, that concentrated hubs of commercial development in close proximity of the Town Centre’s periphery is envisioned. The lands subject to this zoning criteria are considered to represent locations with existing commercial and mixed-use developments surrounded by residential developments, allowing for a healthy mix of uses and services all around the town. This land use zoning has also been identified for development and improvement by the Monaghan County Council, and there is a favourable inclination towards expanding on existing commercial lands.
- Carrickmacross has been identified as a Tier 2 ‘Strategic Town’ within County Monaghan in the Draft Monaghan County Development Plan 2025-2031
- Submission cites Policies and Objectives from the Draft MCDP 2025-2031 that support the submission including SSO2, CMO1, CMO5 and CMO17 and the Core Strategy
- Under ‘Appendix 16 – Infrastructure Assessment and Settlement Capacity Audit’, the submission land has been referenced as CK08 – Drummond Otra. CK08 has been regarded as a Tier 2 Zoned Land, with existing infrastructure of drainage, water supply, and road access, however it lacks in public footpath and lighting infrastructure, both of which are essential to providing for a high-quality residential development. We therefore reiterate that the site is not entirely suitable for residential development and should be rezoned for commercial use which will serve the town of Carrickmacross better.

Submission Request

In summary, this submission requests that Monaghan County Council considers the following:

- *That Site A of the submission lands zoned ‘Proposed Residential B’ under the Draft Monaghan County Development Plan 2025-2031 be rezoned to ‘Existing Commercial’*
- The preceding section of this report details the justification for the submission land to be rezoned to ‘Existing Commercial’ and considers that the submission land as it stands currently under the land use zoning of ‘Proposed Residential B’ would be grossly improper for residential development, given that the site has a singular point of access, which is through an operation commercial site, and is surrounded by mostly industrial and commercial businesses.

Development Context

- Surrounded on the west by O’Connor’s Hardware and adjacent to other light industrial and commercial uses along the R178 – Dundalk Road, the site naturally aligns with commercial activities more than residential
- The current residential zoning limits the efficient use of this land, as it sits in a transitional area between established residential neighbourhoods to the north and commercial properties along the main road corridor
- Additionally, mature vegetation buffers along the northern and eastern edges of the site would minimise any potential impact on nearby residential areas, creating a natural boundary

that would help integrate commercial use on the site, without disrupting residential amenity of nearby estates.

- The site's location makes it an ideal candidate for commercial use and presents an opportunity to expand Carrickmacross's commercial footprint in an area with established transportation links, and to support increase of businesses and job opportunities in County Monaghan overall.
- It is also important to note that part of the site is already in commercial use at present, serving as a storage facility for the adjacent O'Connor's Hardware.

Access

- The subject site has a singular access point, via an internal route of the existing commercial development – O'Connor's Hardware, on its south-western boundary
- The extension of the commercial zoning to the client's site would therefore be considered appropriate noting access is only via the existing commercial development.
- With regards to the accessibility of public transport, it is noted that the site is situated within a 10-minute walking distance of the South Bypass bus stop on R927, linking on to N2
- The bus stop is served by TFI Local Link Route 170, linking Carrickmacross to Cavan, as well as Bus Éireann Expressway Route no. 32 which connects Carrickmacross to Letterkenny in the north, and Dublin in the south.

Infrastructure

- It is submitted that the submission lands are partially serviced
- All roads within immediate access to the site have been maintained in good condition, however the site lacks access to good-quality public footpath and public lighting
- The Infrastructure Assessment and Settlement Capacity Audit undertaken by Monaghan County Council, clearly indicates the submission lands under CK08 area, to be Tier 2 Zoned lands, with partial availability of essential infrastructure
- It is submitted that while the submission lands are suited for expansion of commercial development, it may not be well-suited for residential development, given its limited infrastructure availability and the context of commercial development existing on and around the site.
- A well-planned commercial scheme on this site, can help in attracting talent from nearby towns and cities, and contribute to the economic growth and employment viability of Carrickmacross and County Monaghan.

Site B – Lands at Cloughvalley Lower

Comparison of Recent, Draft and Requested Zoning Maps

- It is requested to rezone Site A from 'Proposed Residential B' to 'Existing Commercial' which will result in the reduction of residential land within Carrickmacross
- However, to offset this impact, our client proposes to expand the residential zoning at Site B, located in Cloughvalley Lower, which is currently designated as 'Proposed Residential B' and is also under the ownership of the landowner
- This approach would ensure that the overall supply of residentially zoned land in Carrickmacross remains unchanged, while also facilitating the more appropriate and efficient use of Site A for commercial development as outlined in the preceding sections of this report.
- At present, Site B is a greenfield site, on the northern periphery of Carrickmacross. It is surrounded by existing residential developments, as well as lands under 'Strategic Residential Reserve' land use
- The site current does not have sufficient access and the proposed extension of zoning to Old Castleblayney Road will ensure the development of this parcel of land to deliver high quality residential development

- It is requested that the land use zoning of Site B, be expanded up till the Old Castleblaney Road, to provide effective access into the site, as well as to offset the reduction of residentially zoned lands as proposed for Site A.

Submission Land

- The submission land is a greenfield site located in proximity to the R927 roundabout and Ballybay Road (R180). It extends to approximately 1 hectare. While the site is in proximity to an excellent road network, due to the lack of direct access, and limitations of the Carrickmacross's boundary and land use zoning, the site cannot be accessed easily or developed, reducing its potential for development.
- The site is predominantly an undeveloped Greenfield, surrounded primarily by agricultural fields and open green spaces. To the south-west of the site, are clusters of residential houses along Ballybay Road. These residences are mostly single-family homes with landscaped yards, and a suburban low-density character
- The site is located approximately 700m from Carrickmacross Town Centre, which offers excellent accessibility to all essential services and amenities that would enhance the liveability of residents in Cloughvalley Lower
- The site is well-suited for private-vehicle use, with an efficient road network facilitating connectivity to both local and regional destinations such as Dublin, Galway, and Letterkenny in Ireland and Belfast and Derry in Northern Ireland
- Given its established proximity to residentially zoned lands, and existing residential estates, it is considered that expanding the zoning of the site and effectively the town's boundary, will be favourable for the future development of residential schemes in the area.

Draft Monaghan County Development Plan 2025-2031

- Under the Draft Monaghan County Development Plan 2025-2031, the submission site has been retained under 'Proposed Residential B' land use zoning
- From the land use zoning objectives under the Draft Monaghan Development Plan, it is clear that the Council already believes the subject site to be appropriate for residential development. However, given that the site abruptly ends without a direct road access, any future residential development in these lands will face issues of accessibility.

Submission Request

This submission requests that Monaghan County Council considers the following:

- *That 'Proposed Residential B' land use zoning for Site B of the submission lands be extended up to Old Castleblaney Road.*

Planning Policy- National Level

Regional Spatial and Economic Strategy for the Northern and Western Region

- The RSES introduces a Growth Framework for the Northern and Western Region, which includes a settlement hierarchy, growth ambitions and supporting policy framework to advance the spatial and economic development of the region
- The RSES designates Carrickmacross as a place of Strategic Potential which is a main economic driver for South Monaghan and is strongly positioned to attract businesses that need access to the Belfast/Dublin corridor
- The RSES recognises the strategic development potential of Carrickmacross due to the availability of land for employment, housing, and services, and its proximity to Dublin. With regards to population growth, the RSES identifies that growth within the town is to be targeted at the delivery of compact growth with a mix of housing densities and plot ratios necessary due to the difficult topography of the town

- As the both the submission lands are located within the environs of Carrickmacross, it is considered that the rezoning of Site A for commercial use, and extension of Site B for providing access to residentially zoned lands, will overall provide residential units in an appropriate zone, and is therefore compliant with the Regional Spatial and Economic Strategy for the region as it will be efficiently providing much-needed accommodation within an existing built-up area within a Strategic Town

Project Ireland 2040 – National Planning Framework

It is considered prudent to note and respond to the commentary provided within the guidelines in relation to each of the 10 no. National Strategic Outcomes as follows:

1. Compact Growth

The submission sites are located close to the Town Centre of Carrickmacross; thus, located within close proximity to existing transport infrastructure including Bus Eireann bus services. We consider Site A representative of an appropriate location for commercial development, while Site B is more suited for residential development and the consolidation of this area. The development of the sites will allow for increased permeability within the immediate area and for the increased viability of existing local community infrastructure.

2. Enhanced Regional Accessibility

Site A is located within 10-minutes of Bus Eireann services available via the South Bypass bus stop. As such, it is considered that the site is well serviced by public transport and is also served by an excellent road network for private-vehicular access to nearby towns and cities.

3. Strengthened Rural Economies and Communities

The development of the submission sites presents a direct opportunity to consolidate development within Carrickmacross. A significant residential development at Site B location will result in the increased viability of commercial services within the immediate area and presents the potential for the further expansion of Carrickmacross, while Site A offers excellent opportunity for the expansion of commercial services and retail offerings which can strengthen the economic opportunity for Carrickmacross's growth as a market town.

4. Sustainable Mobility

In compliance with national policy guidance, the co-ordinated development of the submission sites would ensure that all built form is constructed to the highest architectural standard and is suitably energy-efficient and equipped for challenges anticipated from a changing climate.

5. A Strong Economy supported by Enterprise, Innovation and Skills

The development of the submission Site A and associated consolidation of Carrickmacross could result in a heightened extent of commercial development, enterprise and innovation within the town in the future which would diversify and strengthen the local community.

6. High Quality International Activity

Carrickmacross is both strategically located and served by infrastructure so as to represent a unique location for the development of a sustainable urban centre. Whilst the development of this area will have no direct impact on international competitiveness, it is considered that the guided development of Carrickmacross and Monaghan County more broadly, presents an opportunity to set an international precedent for sustainable development.

7. Enhanced Amenity and Heritage

The development of the submission sites presents a direct opportunity to improve permeability within the immediate area through the improvement of the existing underutilised green fields into residential development (at Site B) and commercial (at Site A) with adequate open space, and amenities.

8. Transition to a Low Carbon and Climate Resilient Society

As stated previously, all built forms within the submission sites will be suitably energy-efficient and equipped for challenges anticipated from a changing climate.

9. Sustainable Management of Water, Waste and other Environmental Resources

Any development of the submission sites would be in line with the principles of Irish Water and the sustainable management and development of the area.

10. Access to Quality Childcare, Education and Health Services

Subject Site B is situated within 700m of Carrickmacross Town Centre, which offers access to various primary and secondary schools. Furthermore, with regard to local amenities, it is noted there are a range of local shops, restaurants, public houses and services available in the town. The further development of Site B and associated increase in population growth is considered necessary to provide an economic justification for the provision of improved recreational and educational services with the provision of shopping facilities generally calculated on the extent of the local population available to avail of such services.

It is thus submitted that the subject sites, which would be considered an underutilised greenfield site, would be best utilised by residential development and would therefore be consistent with the provisions of the National Planning Framework.

4.4 Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024)

- With the subject site being located in Carrickmacross, this means it can be described under the 'Key Towns and Large Towns (5,000+ population)'. The key priorities for such towns, in order of priority, are to:
 - a) plan for an integrated and connected settlement overall, avoiding the displacement of development generated by economic drivers in the Key Town or Large Town to smaller towns and villages and rural areas in the hinterland,*
 - (b) strengthen town centres,*
 - (c) protect, restore and enhance historic fabric, character, amenity, natural heritage, biodiversity and environmental quality,*
 - (d) realise opportunities for adaptation and reuse of existing buildings and for incremental backland, brownfield and infill development, and*
 - (e) deliver sequential and sustainable urban extension at locations that are closest to the urban core and are integrated into, or can be integrated into, the existing built up footprint of the settlement.*
- As a final point, it is considered that the location of Site B is representative of 'Key Town / Large Town - Centre and Urban Neighbourhood' as defined under Table 3.5 'Areas and Density Ranges Key Towns and Large Towns (5,000 population)' of the subject guidelines. In this regard we would note the following commentary as it relates to the appropriate density range for development at such locations:
'The centre comprises the town centre and the surrounding streets, while urban neighbourhoods consist of the early phases of residential development around the centre that have evolved over time to include a greater range of land uses. It is a policy and objective of these Guidelines that residential densities in the range 40 dph-100 dph (net) shall generally be applied in the centres and urban neighbourhoods.'
- A residential development upon the subject site in compliance with the above density range would comprise a scheme of between 40-100 dwellings.

Conclusion

In summary, this submission requests that Monaghan County Council consider the following:

- *That Site A of the submission lands zoned 'Proposed Residential B' under the Draft Monaghan County Development Plan 2025-2031 be rezoned to 'Existing Commercial'*
And
- *That 'Proposed Residential B' land use zoning for Site B of the submission lands be extended up to Old Castleblaney Road.*

- The landholdings to which this submission pertains is located within the periphery of Carrickmacross, the second largest town in County Monaghan.
- The submission lands are serviced by public transportation as well as well-suited for private transportation to nearby cities of Dublin, Galway, Letterkenny in Ireland, and Belfast and Derry in Northern Ireland.
- The Draft Monaghan County Development Plan 2025-2031 has retained zoning of Site A and Site B as 'Proposed Residential B', however, we argue that Site A of the submission lands are better suited for 'Existing Commercial' land use zoning, while it would be appropriate to offset the loss of residential zoning at Site A, by extending the 'Proposed Residential B' land use zoning at Site B, effectively extending the periphery of the town's boundary as well.

Chief Executive Response

The submission relates to two separate plots of land referenced Site A and Site B, are both Tier 1 'Serviced Zoned Lands' and are in the same ownership by Clarlan Limited.

Site A lands are c500m east of Carrickmacross Town Centre and are located adjacent to an existing commercial development (O'Connors Hardware), within the settlement envelope. Part of Site A lands is currently in use as storage for the commercial development. The remainder of Site A lands is currently as a greenfield site. The site is adjacent to an established pattern of industrial and commercial businesses and it is important to continue to support the aim in further strengthening and developing the economic and employment base of Carrickmacross Town. On this basis, it is considered appropriate to rezone Site A from 'Proposed Residential B' to 'Industry/Enterprise/Employment' which will facilitate certain commercial development on this zoning in accordance with the Land Use Zoning Matrix set out in Table 9.3 of Chapter 9 of the Monaghan County Development Plan 2025-2031.

Site B lands are c700m north of Carrickmacross Town Centre at Cloughvalley Lower and are located in proximity to the Regional Road R927 roundabout and Ballybay Road/Regional Road R180. Site B lands comprise a greenfield site located outside the settlement envelope. It is adjoining lands which are zoned as 'Existing Residential', 'Strategic Residential Reserve' and 'Landscape Protection/Conservation' in the Draft Development Plan. It is requested that the Carrickmacross settlement envelope be expanded up to the Old Castleblayney Road to provide effective access into the site, and that the enlarged Site B be zoned Proposed Residential B.

The Core Strategy of the Draft Development Plan recognises the role of settlements in driving the development of the County and identifies the scope of development possible for the County, while remaining consistent with National and Regional policy. It also identifies the quantum and location of development for the plan period, consistent with the population targets and settlement hierarchy that reflects the availability of existing services, planned investment, sequential development and environmental requirements.

Whilst it is proposed in the submission to offset residential zoned lands from Site A to Site B and that access to the site would be facilitated through an expansion of the settlement envelope up to the Old Castleblayney Road, it is considered that the expansion of the settlement envelope would not contribute to the compact growth of Carrickmacross Town. Additionally, there are sufficient lands located within the existing settlement envelope of Carrickmacross Town which are suitable for residential development in more sequentially appropriate locations to meet the projected population increase over the plan period. Therefore, it is appropriate to retain the existing Carrickmacross settlement envelope unaltered.

Chief Executive Recommendations

It is recommended that Site A lands (at Dundalk Road, behind O'Connors Hardware) are rezoned from 'Proposed Residential B' to 'Industry Enterprise Employment'.

It is recommended that Site B lands (adjacent to the Old Castleblaney Road) are not included within Carrickmacross Settlement Envelope.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-100</u>	Stephen Ward Town Planning and Development Consultants Ltd on Behalf of Michael McMahon, Barry McCourt and Thomas Kelly	Lands at Mullanarry, Carrickmacross, County Monaghan.	50

Summary of Submission & Issues Raised

- The submission relates to the proposed zoning of the subject site, which is ‘Strategic Residential Reserve’ in the draft Monaghan County Development Plan 2025- 2031. This submission seeks the rezoning of the lands to Proposed Residential A.
- The subject lands are submitted to be ‘ready to go’ in terms of availability of servicing, proximity to Carrickmacross town centre, and their ability to contribute to the consolidation of the built- up area of Carrickmacross.
- The Kingscourt Road provides a strong physical boundary to the lands, such that their development for housing will be self- contained and represent a defensible and limited rounding- off of the settlement.

Site Location

The submission lands are bound to the north and north-east by the Crann Nua housing development and to the south and south-east by open lands, a one-off dwelling and a piggery. To the west the lands are bound by the R179 / Kingscourt Road and one-off dwellings. There are multi-unit residential developments on the western / south -western side of the Kingscourt Road including a complex of apartments known as ‘An Crannog’ and housing developments including ‘Woodvale’ and ‘Coill Na Rí’. The site is c2.3 hectares and has a natural gradient from north to south.

The lands are effectively enveloped by existing built form, including the housing developments to the north/north-east, the Kingscourt Road itself to the south and south-west and the multi-unit residential developments to the south. The lands are on the settlement side (town side) of the Kingscourt Road so this road acts as a strong, defensible and effective boundary to expansion of the settlement in this area. The lands are fully accessible from the Kingscourt Road to the south and can avail of a pedestrian/cycle connection to the Crann Nua estate to the north, providing a safe and secure connection eastward to the town centre.

Key points

- The location of lands is more suited to residential A than others indicated. Highly accessible to the Town Centre, additional pedestrian access via existing housing developments, footpaths and street lighting.
- An indicative site layout was submitted.
- Feasibility study was undertaken (DFK Consulting Engineers) which demonstrates that the site is fully serviceable (access, water supply, surface water, foul water). In accordance with the Settlement Capacity Audit (SCA) which indicates the site as Tier 1.
- The site is not located within a Flood Risk Zone A or B.
- Under delivery of Housing from the last Plan periods.

Core Strategy

Population growth – Exceeds previous projections from 2022, and the Draft Plan aims to increase population in urban areas from 37.9 to 40%. The high population growth of Monaghan will no doubt have a ‘ripple’ effect across settlements within the County. The development of the submission lands

would contribute to the consolidation of Carrickmacross and would be fully in keeping with Core Strategy Objectives CSO 2, CSO 4 and CSO 5.

It is acknowledged in the draft MCDP that population growth at Carrickmacross far exceeded that of the principal town of Monaghan between 2016 and 2022. Carrickmacross is identified as having significant potential for further growth and is evidently an attractive location in which to live. This however is more reflective of underperformance of population growth at Monaghan Town. Carrickmacross has undergone the high population growth over the most recent Census period, between 2016 and 2022, more than double that experienced by Monaghan Town. It is a Tier 2 Strategic Town and should be prepared to accommodate the growth rate of 16.4% by 2031 applied to it. As it currently stands, the number of sites zoned for low density development far outweighs that of higher density development, which contradicts the principle of compact growth as contained in national and regional policy documents.

Housing Strategy

Under the previous Plan, 314 no. new units were found to be required in order to accommodate the target population of Carrickmacross, which was to be 6,053 by 2025 (Table 2.4). The results of a manual search using Monaghan's e-planning system and the National Planning Application Database show that c250 units have been granted permission in Carrickmacross during the lifetime of the previous Plan, with c220 of these units having been commenced. This is below the projected requirement of 314 no. units, a shortfall of 64no units permitted / c94 no. units commenced. Despite this shortfall, 275 no. 'greenfield' units is the required amount for Carrickmacross in order to accommodate the updated population projection in the draft MCDP. This is less than that required under the previous Plan despite the high population influx experienced by Carrickmacross between 2016 and 2022. Refers to 3 objectives HSO 1, HSO 2, UDO 2.

Existing and proposed residential zoned lands in Carrickmacross

The subject lands are currently zoned 'Strategic Residential Reserve' in the draft MCDP. This zoning also applied to the lands under the MCDP 2019-2025. It is acknowledged in the draft MCDP that residentially zoned lands under the previous MCDP were not substantially developed, and that most residential units have been one-off dwellings in the open countryside. In order to encourage the development of residentially zoned lands, the draft MCDP will take an approach which includes.

- Encouraging sequential development of lands from the settlement centre outwards.
- Retaining a large proportion of the zoning as allocated in the 2019 -2025 MCDP subject to its continued suitability for residential development.

It is submitted that some sites identified for Proposed Residential A may be unsuitable when examined under the above criteria of sequential land development and the retention of lands from the previous MCDP. Some lands have remained undeveloped throughout their status as Proposed Residential A lands. It is considered that, along with the criteria aforementioned, development activity on sites should also be taken into account when rezoning lands for the draft MCDP.

Settlement Capacity Audit

The subject site was found to be acceptable in terms of location and compact growth. However, it did not have extant planning permission, and therefore was given the zoning Strategic Residential Reserve. It is submitted that the application of the 'extant permission' criterion is unfair and unreasonable as it pushes lands without permission further down the order of priority when it would not have been possible to secure planning permission on these lands because of the Strategic Residential Reserve zoning in the previous MCDP 2019-2025, and the developer therefore being unable to apply for planning permission despite their wishes to do so.

In 2007, planning permission for 58no residential units in a mix of detached dwellings, semi-detached dwellings, terraced dwellings and apartments was successfully attained by Birdy Developments Limited on the submission site (PA Ref 071268).

With the two criteria of location and compact growth found to be fulfilled and the third criterion unable to be fulfilled due to constraints beyond the control of the applicant, it is submitted that the subject site is entirely suitable for advancement to Proposed Residential A, with there being no valid reason to maintain its Strategic Residential Reserve zoning.

It is submitted that the SCA needs refinement to ensure there is adequate and available lands at the right locations for residential development over the period of the 2025–2031 Plan. There are a number of sites which have had their Proposed Residential A zoning sustained despite being zoned for residential in the previous MCDP 2019-2025 and not being brought forward for development while having ample opportunity to do so. Other sites were found to be Tier 2 lands but were given Proposed Residential B zoning, ahead of other sites that were found to be Tier 1. There is also a site at the Ballybay Road which was given Proposed Residential A zoning despite having no extant planning permission, no planning history, and having not been assessed under the SCA as the rest of the sites have been.

In light of the widely acknowledged housing shortage it is submitted that the PA must provide sufficient headroom to enable planning permissions to be lodged and for housing developments to be constructed. This headroom must take account of the inactivity of sites that have been zoned Residential A over previous development plans, but which have not come forward for development. It is submitted it is not appropriate to simply rely on these sites in the hope they might come forward in the future, despite there being little or no construction on these sites over the period of the previous Development Plan.

The above suggested approach is also in keeping with the request of the Minister of Housing Local Government and Heritage (HLGH) for all local authorities to critically appraise their residential land use zonings and to take action where lands have been zoned and which are not coming forward for development. The above approach is also fully in keeping with the provisions of the Planning and Development Act 2024 which contains a specific provision (Section 86(7)) that states “Neither a planning authority nor the Commission shall refuse permission for proposed development for the reason only that the housing growth target included in the housing development strategy in respect of the settlement (within the meaning of Part 3) concerned has already been reached”.

The above provision essentially confirms there has been too much emphasis on ‘numbers’ and ‘caps’ in the planning system and this is serving to severely and negatively impact on the provision of much needed new housing. Indeed, it is worth stating that the new national housing requirement is now at least an average of over 50,000 dwellings per year. This serves to confirm that ‘caps’ can very quickly become outdated leading to a severe lag in the planning system adjusting to changing demographics and housing requirements. The 2024 Planning Act effectively acknowledges that in the zoning of sites for residential development detailed consideration must be given that the lands in question are available and at locations where people then have a choice. Otherwise, the sites simply will not come forward through the planning system. This is what has happened at Carrickmacross.

To support this contention and to provide further justification for the zoning of the submission lands as ‘Proposed Residential A’ we have examined a number of sites in the SCA that have not come forward for development. It is emphasised that this submission does not suggest de-zoning any of the following sites. The examination of these sites serves only to prove the suitability of the submission site and support its re-zoning from Strategic Residential Reserve to Proposed Residential A.

Lands at Magheross Road (CK 20)

The CK 20 lands have no extant permission despite having the opportunity to come forward for development during the lifetime of the previous Plan, have nonetheless had their Proposed Residential A zoning sustained. In contrast, the subject site at Mullanarry fulfils the same criteria as CK 20 with the landowners eager to attain planning permission for the lands. The only reason planning permission has not be sought on the submission lands is because they are not zoned for residential development under the previous Plan. Prior to this, the lands had full planning permission under PA Ref 071268.

In 2023, the owner of the CK 20 lands appealed their inclusion in the Residential Zone Land Tax to An Bord Pleanála (ABP Ref 316792), stating in their submission that the lands should be removed from the draft map on the basis that they are in agricultural use, and there is no intention to develop the site for residential uses.” The landowner further stated that “there are other lands in the area that would be more suitable for the development of housing than the subject lands” (Inspector’ s Report). Nonetheless, the inclusion of the lands on the Residential Zone Land Tax was sustained.

Lands at Kilmactrasna (CK 23) - The above CK 23 lands were not brought forwards for development despite being zoned Proposed Residential A in the previous Plan. There is no planning history evident on the site either. In contrast to the subject lands, this site is low- lying, adjacent to a body of water, and prone to flooding.

Lands at Drummond Otra (CK 8) - It is submitted that the zoning category applied to the above site contradicts SCA, in which it was found that the site did not have public lighting, public footpath accessibility, and was prone to pluvial flooding.

LANDS AT BALLYBAY ROAD / NAFARTY (NO REFERENCE) - The below lands were not included as part of the Settlement Capacity Audit in Appendix 16 of the draft MCDP but have been included as Proposed Residential A. This site does not have any extant planning permission.

LANDS AT MAGHEROSS / ARDEE ROAD (CK 19) - This site was zoned for residential development under the previous MCDP 2019- 2025 but failed to successfully attain planning permission. According to the SCA, these lands were retained as Proposed Residential A due to their extant permission. However, in June of 2024 An Bord Pleanála refused permission on the lands so there is no extant permission on them. In addition to this, the lands are at a further distance from Carrickmacross’ town centre than the subject lands, the latter of which can utilise an existing pedestrian connection from Crann Nua to Main Street.

The Urgent Need of Land for Housebuilding

It is widely acknowledged that there is a severe national housing shortage. It is expected that the review of the National Planning Framework will result in a significant increase in population projections and housing requirements. Indeed, the Draft NPF will now contain a requirement for at least 50,000 houses per annum on average, significantly above the existing NPF which contains a requirement of c33,000 houses per annum. The housing shortage has been identified by the American Chambers of Commerce Ireland as a constraint in bringing new employment opportunities to Ireland; its most recent survey stated that some 40% of people view housing as the biggest challenge for Ireland to overcome in order for companies to want to invest and expand here. Over 60% of respondents said housing required the most urgent investment from Government.

Only five sites in Carrickmacross are zoned Proposed Residential A under the draft MCDP. This means that only five sites are zoned for higher density residential development, with Proposed Residential B

sites being specified for low density residential development. Two of these Proposed Residential A sites were zoned the same under the previous Plan but failed to be brought forward for development.

No Strategic Reserve lands have been brought into either Proposed Residential A or B. The only site that has seen an advance from B to A is part of the lands at Cloghvalley Lower, but the southern portion of the site was changed from A to B at the same time.

Some sites that had been zoned Strategic Residential Reserve under the previous Plan have had other zoning categories applied to them in the draft MCDP, such as the below sites which have seen a proposed change from Strategic Residential Reserve to Industry / Enterprise / Employment, and from Strategic Residential Reserve to Community Services / Facilities. This is in spite of the zoning objective 'to protect lands that are considered strategic in location for future residential development.' These changes further constrain the availability of lands for new housing development in the settlement.

It is evident from the above information that lands in Carrickmacross are simply not being released for housing despite being zoned for Strategic Residential Reserve in the previous Plan. Instead, lands which have not come forward for development in the lifetime of the previous Plan are remaining zoned for residential development despite their inactivity. In a strategic town like Carrickmacross that has seen a significant population influx and is to grow at a rate compatible to that of the principal town of Monaghan, there is a dire need for more lands to be zoned Proposed Residential A.

It is submitted that the subject site at Mullanarry presents a serviceable site with pedestrian connectivity to Carrickmacross' town centre and is ideally suited to be zoned Residential A in the new County Development Plan.

Regional Spatial and Economic Strategy for the Northern and Western Region (RSES)

Monaghan is located within the area of the Northern and Western Regional Authority area. The Authority area covers the counties of Cavan, Donegal, Monaghan, Leitrim, Roscommon, Mayo and Galway (City and County). The Regional Spatial and Economic Strategy for the Northern and Western Region (RSES) notes Carrickmacross as a strategic location within County Monaghan, alongside the principal town of Monaghan. It is identified as a hub for south Monaghan, acting as a main economic driver for a wide and highly-populated catchment area and providing important sub-regional functions for employment, housing and services (p138).

Draft First Revision to the National Planning Framework (NPF)

The Draft First Revision to the National Planning Framework (NPF) was published in July 2024. It is part of the overall strategy of the revised NPF to target a level of growth in the Northern and Western Region, combined with the Southern Region, that will at least match that projected in the Eastern and Midlands Region. It is envisioned that the population of the Northern and Western Region will climb to just over one million people by 2040.

The draft revised NPF states that *"there is a projected total requirement to accommodate approximately 50,000 additional households per annum to 2040"* (p90). It further states that, *"In setting overall targets for future growth, it is a pattern of development that is being targeted, rather than precise numbers. From a long-term, national perspective, the targeted location, relative scale and proportionality of growth will assist in monitoring and assessing delivery and performance"* (p.18). The 2024 Report of the Housing Commission identified a deficit of 235,000 dwellings, and given this deficit, *"a period of accelerated housing delivery"* must be included in over 10% of households, policies and targets for future housing output. In order to overcome this deficit, the level of housing delivery required from 2024 to 2034 includes an added 50% to the increasing annual output for the period (p30).

The NPF and the RSES both make clear that population targets are not to be viewed as caps or ceilings. It follows that exceeding a population target or provision of lands for residential development that might result in a population being exceeded does not mean that the Plan is no longer consistent with national and/or regional planning policy as set out in the NPF and/or RSES. It is submitted, as mandated by the NPF, that the growth strategy should be focused on identifying lands with the capacity and greatest potential for coming forward within the lifetime of the draft MCDP. Taking the above into account, it is submitted that maximum flexibility must be applied to the residential land- use zoning allocation in the draft MCDP zoning map.

In this submission we have demonstrated the disadvantages of prioritising numbers or caps over the settlement pattern approach. It is submitted that simply dividing the areas of sites by an expected number of dwellings per hectare is too simplistic and does not in fact provide any indication of the number of dwellings coming forward. We have demonstrated and illustrated in this submission that there are many sites, even within Carrickmacross itself that are zoned Residential A but have simply not—and will not—come forward for development.

Summary

- The lands are very well related to the existing built-up area of Carrickmacross and are enveloped by existing development and other built infrastructure, including housing development to the north and north-east and by the Kingscourt Road to the west. Development of the lands would represent a limited, sensible and very well-defined extension to settlement. Extending to c2.3ha, the site could potentially accommodate c80 dwellings at a density of 35 dph.
- The site is sequentially preferable with excellent pedestrian/cycle connection to the Main Street, via the Crann Nua housing development and then Shirley House Lane facilitating use of active travel modes to and from the town centre. It is evident from the zoning map for the settlement that even on an ‘as the crow flies’ measurement, the lands are closest to Main Street and are closer to the centre than the SRR lands to the east, north-west and north of the town.
- The applicant has engaged Doherty Finnegan Kelly (DFK) Consulting Engineers to undertake an Engineering Assessment of the site and this is attached as Appendix A to this submission. The DFK Report confirms the lands are serviceable from all engineering perspectives including access, water supply, surface water (surface water design calculations are included in the Report), foul water, and flood risk. With regard to flood risk the Report concludes the lands are not within Flood Risk Zoned A or B and *“therefore, flooding is not considered as an issue with regards to the proposal”*.
- The findings of the DFK Report mirror those of the Planning Authority’s own In the Settlement Capacity Audit (SCA)—contained in Appendix 16 of the draft MCDP and associated SCA Map titled ‘Carrickmacross (Residential Lands)’—with the subject lands being identified as Tier 1 lands. This means that the appropriate infrastructure is found to be fully available for the site.
- The submission lands are not effected by any built or natural heritage or planning policy environmental constraints such as protected views, scenic routes, sensitive landscape designations, protected structures or architectural conservation areas and as such are unconstrained in this regard.
- There is insufficient land zoned for Proposed Residential A in the draft MCDP and a lack of coordination regarding the changes to zonings e.g. lands being changed from SRR to non-residential uses, no additional lands being brought forward for Proposed Residential A, lands zoned Proposed Residential A that have remained undeveloped over the previous Plan either due to disinterest of the landowner in developing them or other reasons.

Chief Executive Response

Monaghan County Council welcome the submission to the draft Monaghan County Development Plan 2025-2031. The submission includes a rezoning request and includes comments/observations on the proposed housing allocation for Carrickmacross, associated population projections, examines other sites which have been zoned in the draft plan and presents why these subject lands should be zoned.

The submission requests that the subject lands are rezoned from Strategic Residential Reserve to Proposed Residential A.

The Core Strategy of the County Development Plan recognises the role of settlements in driving the development of the County and identifies the scope of development possible for the County, while remaining consistent with National and Regional policy. It also identifies the quantum and location of development for the plan period, consistent with the population targets and settlement hierarchy that reflects the availability of existing services, planned investment, sequential development and environmental requirements.

Whilst it is acknowledged that the lands have services available to them, the subject lands are located on the periphery of Carrickmacross Town. The rezoning of the subject lands would therefore not contribute to the compact growth of the town. Additionally, there are sufficient lands located within the existing settlement footprint of Carrickmacross Town which are suitable for residential development in more sequentially appropriate locations to meet the projected population increase over the plan period.

The subject lands are however considered to form part of a parcel of lands which are strategic in location and importance for future of residential development within Carrickmacross. As such, their Strategic Residential Reserve zoning should remain.

Chief Executive Recommendations

No amendment recommended.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-103</u>	Park Edge Contracting Ltd c/o Stephen Ward Town Planning	Coill an Ri, Carrickmacross, Co. Monaghan	N/A

Summary of Submission & Issues Raised

- This submission relates to a portion of lands measuring approximately 0.55ha within the Coill an Ri Residential Development (currently under construction) at Kingscourt Road, Carrickmacross.
- The submission seeks the rezoning of the lands from Recreation/Amenity to Proposed Residential A. A map of the subject lands accompanies the submission.
- The subject lands are located in the SW corner of the development and forms part of a larger block of Open Space/Recreation zoned lands that extends in a northerly direction.
- The subject lands are surrounded on 3 sides i.e. to the east, south and west by the rear/side boundaries of existing dwellings and to the north by a pumping station.
- The lands are bounded to the north by the side boundaries of existing dwellings within the adjoining “Woodville” residential development; to the east in part by the side boundaries of permitted dwellings. In the Coill An Rí development and the front driveways of two permitted terraced blocks within the scheme; to the south by the rear boundaries of dwellings in the “Foxfield” residential development; and to the west by the rear boundaries of dwellings in “Foxfield”.
- The submission provides justification for the unsuitability of the subject lands for recreation/amenity uses:
 - The secluded location of the submission lands within the existing built-up area in conjunction with the lack of any opportunity to provide an active interface, passive overlooking or new connections to adjoining lands make them wholly unsuitable for Recreation /Amenity uses, as proposed in the Draft Plan.
 - There is no opportunity for permeability or overlooking of any kind. Whilst the boundary to the north is current ‘open’, the position of the pumping station eliminates any possibility of providing ‘eyes on the street’ from this location.
 - These characteristics render the submission lands virtually useless in terms of their capacity to provide a usable, functional and safe recreation and amenity space.
 - Their peripheral and backland location mean that they would fail to meet even the most basic design quality standards governing the design and location of public open space. Reference is made to Section 15.8 of the Draft Monaghan County Development Plan which states that ‘Peripheral areas, narrow tracks, backland areas, steeply sloping and poorly proportioned areas will not be considered acceptable’.
 - *Proposed Residential A* would be a much more appropriate use of this relatively small, backland area whilst also making more efficient and sustainable use of land.
 - The full extent of the lands zoned for Recreation/Amenity uses in the SW corner of the “Coill An Rí” development measures approximately 0.9 hectares. In quantitative terms, the rezoning of the submission lands to “Proposed Residential Phase A” would leave a balance of 0.35 hectares to be developed for “Recreation/Amenity Uses”.
 - Although smaller in area, in qualitative terms, the amendment to the zoning sought would facilitate the creation of a much higher quality area of public open space that is comfortable and safe arising from the opportunity to create natural surveillance and increased activity from the construction of dwellings to the south.
 - The rezoning of the submission lands to “Proposed Residential Phase A” would mean that any future active /green connection to residentially zoned lands to the west is

likely to be much more successful by virtue of the increased level of activity and passive surveillance that the construction of dwellings would bring.

- Reference is made to Section 15.8 of the Draft Development Plan which supports this approach calling for open space to provide linkages to adjoining residential areas and community facilities.
- Planning permission (ref. No. 15/11, extended and amended under 20/90004 and 22/113 refers to the site – a development of 96 dwellings. 1.08 hectares out of 5.077 hectares are set aside for open space uses, equating to over 21% of the overall residential area. These areas of public open space within the site are generally characterised by poor ground conditions meaning they simply were and are not capable of any significant loading bearing and as such were and are not suitable to be developed for residential uses.
- The quantum of open space provided therefore greatly exceeds the current national minimum standard of 10 per cent as prescribed in the Sustainable Development and Compact Settlement Guidelines for Planning Authorities (2024) and the 15 per cent standard proposed by the Draft Development Plan (Table 15.2) for residential developments comprising between 40-150 dwellings.
- In its current form, excluding the submission lands, the level of public open space within the Coill An Rí development already exceeds minimum standards by some 5 – 10 per cent. The rezoning of the submission lands would have no significant adverse impacts on the amenity of the area or the level of open space provision nor would it impede the opportunity to provide active linkages to adjoining residentially zoned lands to the west.
- At 0.55 hectares, the submission lands equate to just 1 per cent of the overall Coill An Rí site.
- It is stated that the rezoning of the subject lands for residential uses is likely to result in better quality provision of future open space and connections by reason of increased levels of surveillance and activity that residential development would bring.
- A review of relevant sources indicates the submission lands are not subject to any landscape designations or to environmental, heritage or conservation constraints such that would render them unsuitable for residential development.
- The submission notes the reference in the Regional Spatial and Economic Strategy for the Northern and Western Region (RSES) with Carrickmacross as a strategic location within County Monaghan, and National Policy Objective (NPO)3(c) as set out in the National Planning Framework, stipulating that 30 per cent of all new homes in settlements outside of the five Cities are delivered within the built-up footprint.
- The lands would form a natural and sensible extension to the Coill An Rí development and to the residential area within which they sit being enveloped by development and other built infrastructure to the north, south, east and west and fully serviceable.
- The lands are sequentially preferable with active travel connectivity to the Main Street available via the Coill An Rí development within which they are located.
- It is expected that the review of the National Planning Framework will result in a significant increase in population projections and housing requirements.
- The 2024 Report of the Housing Commission identified a deficit of 235,000 dwellings, and given this deficit, “a period of accelerated housing delivery” must be included in over 10% of households, policies and targets for future housing output. In order to overcome this deficit, the level of housing delivery required from 2024 to 2034 includes an added 50% to the increasing annual output for the period (p30).
- It is imperative that adequate and appropriate zoned lands are available for residential development to meet rising demand. As mandated by the NPF, the growth strategy

should be focused on identifying lands with the capacity and greatest potential for coming forward within the lifetime of the draft MCDP.

- With the Coill An Rí development currently under construction and boots on the ground, the rezoning of the submission lands to “Proposed Residential A” would contribute to a more sustainable and compact settlement form whilst providing urgently needed housing.
- The secluded location of the submission lands within the existing built-up area in conjunction with the lack of any opportunity to provide a passive overlooking or new connections to adjoining lands make them wholly unsuitable for Recreation /Amenity uses, as proposed in the Draft Plan renders them lands virtually useless in terms of their capacity to provide a usable, functional and safe recreation and amenity space.

Chief Executive Response

This submission requests a rezoning from ‘Recreation/Amenity’ to ‘Proposed Residential A’. The subject lands were identified as part of the open space provision for 96 houses approved under 15/11, as extended and amended under 20/90004 and 22/113. Consideration of the open space provision for the approved residential dwellings formed part of the planning assessment in the above permissions, as such, it is not considered appropriate to rezone the subject lands from ‘recreation/amenity’ to ‘Proposed Residential A’.

Chief Executive Recommendation

No amendment recommended.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-107</u>	Pat McNally	Lands at Castleblayney Road, Carrickmacross	52 & 53

Summary of Submission & Issues Raised

The submission requests the inclusion of lands within Carrickmacross settlement envelope and lands to be zoned ‘Industry, Enterprise and Employment’.

The rezoning of “Lands A and B” is requested to be zoned ‘Industry, Enterprise and Employment’, consistent with their designation in previous development plans and would align with the industrial businesses currently operating in this vicinity.

Chief Executive Response

The submission lands referenced as Lands A and B are both located outside the Settlement Envelope. Lands A are located to the north-west of the R927 roundabout while Lands B are located to the east of the N2 National Primary Road.

Carrickmacross has a sufficient quantum of land zoned Industry/Employment/Enterprise determined on a number of factors including developed and undeveloped lands, the uptake of current zoned land, planning and environmental considerations, such as topography, developable area, flooding, sequential test, accessibility and jobs ratio. These key considerations influence both the quantum of lands proposed to be zoned, and the locations of same, within the County Development Plan 2025-2031. It is important to continue to support the aim in further strengthening and developing the economic and employment base of Carrickmacross Town.

Given the quantum of lands located within the existing settlement footprint of Carrickmacross Town, which are suitable for ‘Industry/Employment/Enterprise’ development in more sequentially appropriate locations, it is recommended that the lands referenced as Lands A and B remain unzoned lands outside the Settlement Envelope.

In addition, the submission lands are the located outside the Settlement Envelope, and Lands B have access difficulties from the N2 and are at risk of flooding.

Chief Executive’s Recommendation

No amendment recommended.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-112</u>	Ardee Road and Drumconrath Road Residents c/o EHP Services	Drumconrath Road, Carrickmacross	54

Summary of Submission & Issues Raised

Highfield Estate Open Spaces

- The submission notes that the large areas of public amenity space running along the south eastern and north eastern edges between number 46 and 92 Highfield have been coloured white on the Draft Plan zoning map. It is assumed that this is a mapping error.
- The submission states that the 'de-zoning' of these long established and essential green space will facilitate future development of the open space and will facilitate vehicular access to the adjoining parcel of land zoned as Proposed Residential A in the Draft Development Plan.
- The submission requests that the area of recreational open space is reverted back to its previous 'Existing Residential' zoning or be zoned as 'Recreation and Amenity'.

Zoning of Lands along Drumconrath Road

- The land to which the submission relates is zoned as 'Proposed Residential A' within the current development plan (2019-2025) as well as the Draft Development Plan. The land was not zoned within the 2013-2019 plan and was located outside of the settlement envelope of Carrickmacross.
- Two unsuccessful planning applications, 22/344 (withdrawn) and 23/60218 (refused) have been made on these lands.
- The submission states that as the development of the subject site is entirely reliant upon third party property to provide a safe and compliant vehicular entrance onto the Drumconrath Road which is not under the ownership and/ or control of the subject site's current owner, the subject site should be rezoned to 'Proposed Residential B' or 'Strategic Residential Reserve'.
- In support of the request for rezoning, it is submitted that the delivery of Carrickmacross' future housing cannot nor should not be reliant upon land that, despite being zoned, cannot deliver and/or has failed in the past to secure planning permission.
- The submission recognises the designation of Carrickmacross as a Tier 2 Strategic Town. Based on the household size, submission states that the construction of between 335 and 244 new dwellings would be required to meet the increased population projected by 2031 (942 persons).
- The Infrastructure Assessment and Settlement Capacity Audit carried out designates the land as a Tier 1 site. The submission states that to accommodate the estimated need for circa 344 new houses within the lifetime of the plan, 64.8573 hectares of Tier 1 land is more than sufficient without the inclusion of the subject site.
- The submission notes that Appendix 16 does not elaborate upon what scoring system was used in the subsequent infrastructure Assessment or what marking weight was given to each assessment criteria but it is noted that only 4 of the 44 identified sites were designated as Tier2 and that many of those identified as Tier1, including the subject site, are located at the periphery of Carrickmacross rather than within the centre.
- The submission states that the inclusion of the site as a Tier 1 is an error, inappropriate and should be reconsidered for the following reasons:
 - Road Infrastructure: Development of the subject site requires substantial works to the Drumconrath Road. Planning Ref. No. 2360218 proposed the realignment of 100m section of the western northbound) lane of the Drumconrath Road, construction of a dual purpose pedestrian crossing and traffic calming raised table.

- Footpaths: There is no footpath on the subject site or western side of the Drumconrath Road connecting to the Ardee Road footpath. The substantial road works proposed in Planning Ref. No. 2360218 would necessitate new residents to cross the Drumconrath Road twice, travelling on foot towards Carrickmacross town centre.
- Public lighting: New street lighting has been recently installed along the Drumconrath Road.
- Surface Water: In refusing Planning Ref. 2360218 the second reason states the development would have an unacceptable impact on the water environment, including surface water and groundwater quality and quantity, was contrary to Policy WPP 11 of the County Development Plan 2019- 2025. In the absence of a ground water and surface water assessment, requested in the interests of environmental protection, the development' s potential impacts upon the water environment was not established. As such Planning Ref. No. 2360218 was considered contrary to Policy WPP11 and the proper planning and sustainable development of the area.
- Waste Water: Chapter 8 of the current County Plan and associated planning policies require co- ordination and compliance with Irish Water requirements. No issue of concern was raised in this regard when assessing Planning Ref. No. 2360218.
- Water Supply: In refusing Planning Ref. No. 2360218 the second reason stated the development would have an unacceptable impact on the water environment, including surface water and groundwater quality and quantity, was contrary to Policy WPP 11 of the County Development Plan 2019- 2025. In the absence of a ground water and surface water assessment, requested in the interests of environmental protection, the development' s potential impacts upon the water environment was not established. As such Planning Ref. No. 2360218 was considered contrary to Policy WPP11 and the proper planning and sustainable development of the area.
- The submission states that the subject site is more aligned as a Tier 2 site and further justifies the reconsideration of the zoning as 'Proposed Residential B' or 'Strategic Residential Reserve'.
- With respect to the Settlement Capacity Audit, the submission states that the justification for designating it a Tier 1 site is undermined for the following reasons:
 - Location (within 10-15mins/1.5km walk of Town Centre: The site is located c1.2km from the Town Centre (junction between Main Street and Farney Street).
 - Compact Growth: The site is a greenfield site, peripheral to the urban core. Development of the site promotes urban sprawl and the loss of a greenfield site in contravention of sustainable, compact urban growth.
 - Extant Permission: None
- The subject lands Tier 1 status is questionable. It is therefore submitted that the subject site does not justify its Tier 1 designation; it is wildly superfluous to Carrickmacross' future needs up to and beyond 2031. Its development is heavily dependent on substantial infrastructural services and so should be rezoned to 'Proposed Residential B' and/ or 'Strategic Residential Reserve'.
- Section 16.2 of the current County Development Plan outlines the benefit of a two year review on how well the Plan' s strategic objectives and planning policies are delivering upon the Core Strategy including the delivery of residential development. Section 16.2 states in the event that lands zoned as 'Proposed residential A' or 'Proposed Residential B' are not developed or have not secure planning permission for residential development within two years of adoption of the plan '... consideration should be given to rezoning parcels of land zoned Strategic Residential Reserve to Proposed Residential, where these are sequential and serviceable and where residential development can be delivered in lieu of zoned Proposed residential lands not actively progressed'.

- The Two Year Progress Review Report published in April 2021 concluded not to de-zone undeveloped residentially zoned sites due to potential legal impediments. It recommended the ‘... managed release ...’ of sequential and serviceable Strategic Residential Reserve zoned lands which are located within the existing footprint of the settlements. It also recommended ‘... further investigation and progression of this approach ...’. Assuming such investigation has progressed since 2021 it is submitted that the review of the draft County Development Plan is an excellent opportunity to carefully reconsider the zoning and subsequent development potential of the subject site and other peripheral greenfield sites in Carrickmacross.
- The submission states that the zoning of the subject site is contrary to both the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES) for the following reasons:
 - The NPF includes a major policy emphasises on renewing and developing existing settlements rather than ‘... continual expansion and sprawl of cities and towns out into the countryside at the expense of town centres and smaller villages’. Its sets a target for at least 40% of all new housing to be delivered within the existing built up areas of cities, towns and villages on infill and/or brownfield sites. One of the NPF’s National Strategic Objectives highlights consolidated growth as a means of managing the sustainable growth of compact towns and villages. National Policy Objective NPO) 3a seeks to deliver at least 40% of all new homes nationally within the built up footprints of existing settlements. NPO 33 prioritises the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location. Section 4.5 of the NPF states a significant proportion of future urban development is targeted on infill/ brownfield development sites within ‘... the built footprint of existing urban areas ...’ which is applicable to all scales of settlement.
 - The Northern and Western Regional Assembly’s Regional Spatial & Economic Strategy (RSES) 2020- 2032 underscores the NPF prioritisation of compact urban growth in meeting national housing targets and respective County based Core Strategies.
- The Department of the Environment, Heritage and Local Government’s Quality Homes for Sustainable Communities – Best Practice Guidelines for Delivering Homes and Sustaining Communities (2020) reinforces national policy objectives aimed at increased residential development within existing urban settlements as a means of achieving consolidated urban growth. Sections 1.4.1 and 1.4.2 encourage the use of infill and backland sites in order to help improve the cohesion of a town or village. The Department of Housing, Local Government and Heritage’s Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024) also recognise the need to achieve an efficient use of land through the appropriate and sensitive development of infill, backland and brownfield sites within established urban boundaries in preference to urban expansion through peripheral greenfield site development.
- The submission states that the continued zoning of the subject site as ‘Proposed Residential A’ and the subsequent questionable reliance upon its development is, fundamentally contrary to these national and regional objectives and principles of proper and sustainable development and within context of these planning objectives and guidelines there exists more than sufficient justification to rezone the subject site ‘Proposed Residential B’ and/or ‘Strategic Residential Reserve’.

Conclusion

- The Draft County Development Plan should place greater emphasis through its zoning and planning policies on the development of infill, brownfield and/or backland sites closer to Carrickmacross’ town centre than in continuing to facilitate the unsustainable and unrealistic development of peripheral, greenfield sites such as the subject site
- The metrics used to assess/classify the subject site as a Tier 1 site are in error and that rather than heedlessly replicating the current County Plan’s zoning map, the Draft Plan presents an

opportunity to place the subject site's development at a more appropriate, long term future date rather than within the draft County Plan's lifespan and only as and when services are made available and a proper and compliant vehicular site entrance can be provided.

Chief Executive Response

The submission requests:

1. That the area of recreation open space within Highfield Estate is amended to 'Existing Residential' or 'Recreation and Amenity' and
2. The subject lands are rezoned from 'Proposed Residential A' to either 'Proposed Residential B' and/or 'Strategic Residential Reserve'.

In addressing point 1 above, the colour as illustrated on the maps of all areas of open space located within residential developments was amended to 'white lands' to satisfy direction received from the Department in relation to the Residential Zoned Land Tax (RZLT).

In addressing point 2 above the Core Strategy of the County Development Plan recognises the role of settlements in driving the development of the County and identifies the scope of development possible for the County, while remaining consistent with National and Regional policy. It also identifies the quantum and location of development for the plan period, consistent with the population targets and settlement hierarchy that reflects the availability of existing services, planned investment, sequential development and environmental requirements. In recognition of its role in providing employment, housing and services for the south of the County, Carrickmacross is designated as a town with strategic potential on a regional scale in the Regional Spatial and Economic Strategy for the Northern and Western Regional Assembly Area.

The Development Plan acknowledges the need to include for the reuse, regeneration and renewal of land through active land management over the Plan period, having regard to legislative requirements and to National and Regional policy. The National Planning Framework (NPF) target of delivering 30% of new housing within the existing built-up footprint of settlements, on infill and brownfield lands and the principles contained within the Town Centre First Party are acknowledged in the Development Plan as key considerations in this regard. As a result, the Development Plan notes that a proportion of future urban development will occur on infill/brownfield/regeneration lands within the built-up envelope of existing settlements, and this has been reflected within the Core Strategy Table.

In accordance with NPF National Policy Objective 72a, the Planning Authority carried out an Infrastructural Assessment (IA) of the existing undeveloped zoned lands in Carrickmacross Town. The assessment considered the availability of service infrastructure (watermains, foul sewers, surface drainage systems) and transport infrastructure (roads, footpaths) that would allow the development of lands immediately or during the Plan period. As set out in Appendix 16 of the Draft Plan, the Tier 1 sites (i.e. fully serviced) resulting from the IA were then subject to a further examination as part of the Settlement Capacity Audit. The sites were assessed based on a number of criteria which are detailed within the Appendix. The subject lands were identified as Tier 1 'Serviced Zoned Lands', that is the lands can connect to existing development services for which there is service capacity available and where new development can therefore be accommodated.

The subject lands are located 350 metres from the edge of the Town Centre and are surrounded by residential development to the north west, north east and south east. Additionally, the subject lands are located within 700 metres of Carrickmacross Library and Municipal District Office, within 600 metres from Aldi Discount Food Store, and within 500 metres from Carrickmacross Primary Care Centre and Lidl Discount Food Store. In this regard it is considered that the zoning of the subject lands will contribute to the consolidation of the settlement envelope of Carrickmacross.

The submission states that the subject land is reliant upon third party property to ensure a safe and compliant vehicular entrance and states therefore that the lands should be rezoned to 'Proposed Residential B' or 'Strategic Residential Reserve'. The argument presented is however unclear, if it is suggested that the lands zoned as Proposed Residential A cannot be developed due to reliance upon third party land, it is unclear how the author suggests it merits a rezoning of the land. In the event that third party lands were required to facilitate the development of the subject site when zoned as 'Proposed Residential A', it would appear that this would also be the case if the subject lands were rezoned to 'Proposed Residential B' or 'Strategic Residential Reserve'.

The planning history of the subject lands is summarised as follows:

22/344: Erection of 51 houses. Withdrawn

23/60218: Erection of 50 dwellings. Refused.

24/60437: Erection of 51 dwellings. Under Consideration

Whilst to date, it is acknowledged that planning permission has not been granted for development on the site, it is noted that a recent planning application has been submitted and has yet to be determined.

Based on the above, the subject lands are most appropriately zoned 'Proposed Residential A'.

Chief Executive Recommendation

No amendment recommended.

Core Strategy Summary - Carrickmacross

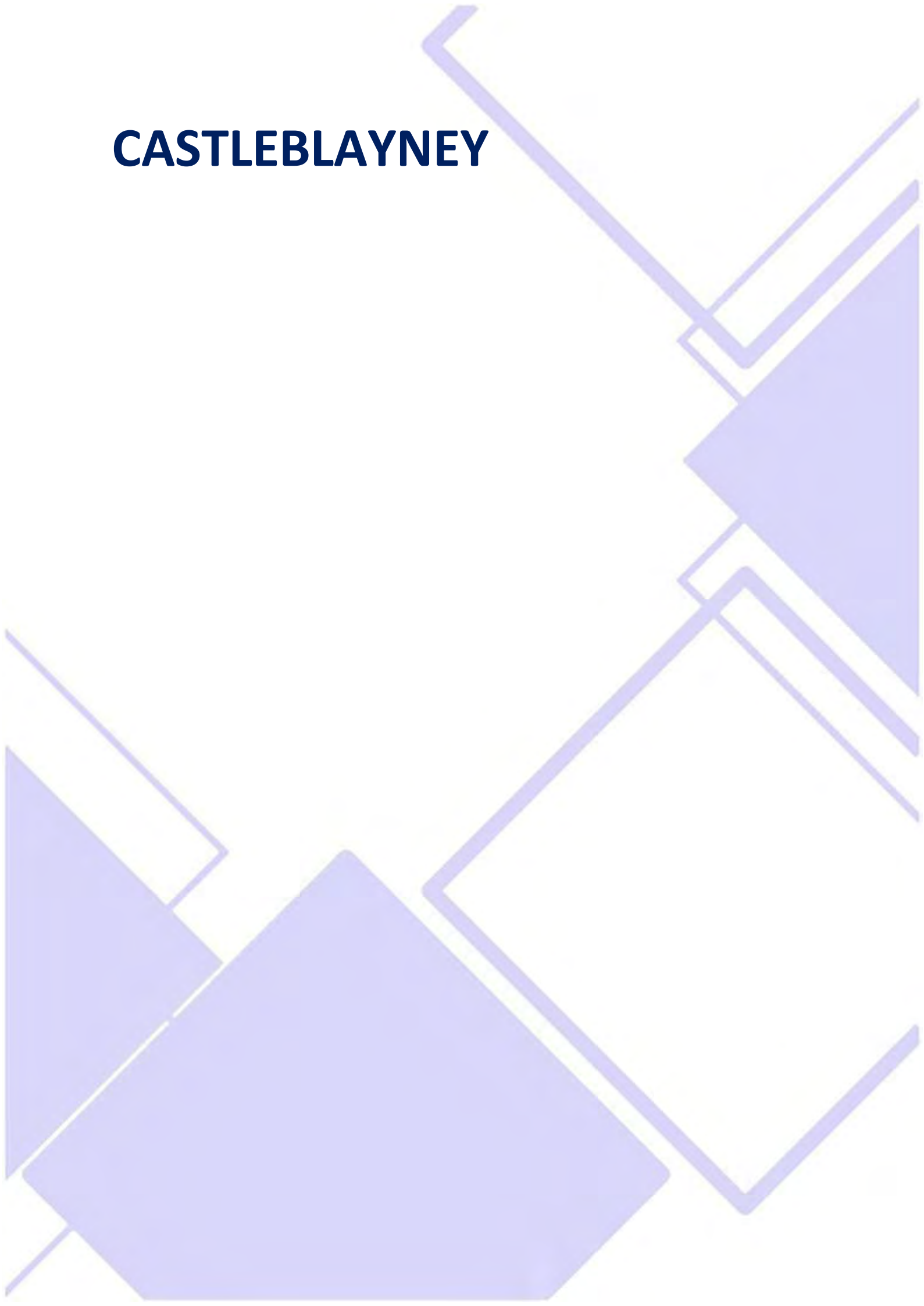
As detailed in the Chief Executives response to the submission received from the Office of the Planning Regulator (Submission MN-C22-MCDP-126) the Core Strategy has been revised having regard to the amended Housing Supply Target Table. The residential zoned land requirement for Carrickmacross has been adjusted to 22.38ha as indicated in the revised Table 2.5, a reduction of 0.8ha from the draft Plan.

Following consideration of the submissions received, one residential zoning change has been recommended for Carrickmacross in this report to ensure alignment with the revised Core Strategy, as detailed in the table below. The left hand column of the table indicates the lands recommended to be zoned for residential use, while the column on the right recommends lands to be rezoned from Proposed Residential A or B. Related maps identifying the changes are attached for reference.

The Chief Executive's report recommends the rezoning of the lands at Drummond Otra (Submission No. 83) from 'Proposed Residential B' to 'Industry/Enterprise/Employment'.

Submission No.	Area of proposed additional Residential A & B Zonings	Submission No./ Site No.	Area of proposed Residential A & B Zonings be rezoned/dezoned
-	-	83 (Drummond Otra)	0.93 ha
Total area of lands proposed for addition	-		
Reduction as per revised Core strategy	0.80 ha		
Total	0.80 ha	Total area of lands proposed for rezoning	0.93 ha

CASTLEBLAYNEY



Submissions relating to Castleblayney Town			
Submission No.	Name/Organisation	Location of Subject Lands	Page No.
<u>MN-C22-MCDP-7</u>	Shane Donnelly	Conabury Hill, Castleblayney.	399
<u>MN-C22-MCDP-19</u>	JC Developments (NI) Ltd c/o Genesis Planning Consultants	Annahale and Onomy, Castleblayney	400
<u>MN-C22-MCDP-24</u>	Concra Wood Golf and Country Club	Concra Wood	405
<u>MN-C22-MCDP-35</u>	IAT Futures c/o Genesis Planning Consultants	New Street Convent of Mercy, Castleblayney	408
<u>MN-C22-MCDP-54</u>	Lisa Morgan	Lands at Tullynacrunut, Castleblayney	411
<u>MN-C22-MCDP-68</u>	Brian Sherry	Tullynacrunnatt, Conabury	413
<u>MN-C22-MCDP-98</u>	Aldi Stores (Ireland) Limited c/o John Spain Associates	Castleblayney	415
<u>MN-C22-MCDP-99</u>	Gerard Campbell	Market Square Castleblayney	422
<u>MN-C22-MCDP-102</u>	Berwat Construction Ltd c/o Armstrong Fenton Associates	Killycard, Castleblayney	423
<u>MN-C22-MCDP-111</u>	Janet Coogan	Castleblayney, co. Monaghan.	426
<u>MN-C22-MCDP-130</u>	Gerald Murphy	Killycard and Tullyskerry, Castleblayney	428
<u>MN-C22-MCDP-147</u>	Paul McCormack c/o CS Pringle	Corracloghan, Monaghan Road, Castleblayney	429

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-7</u>	Shane Donnelly	Conabury Hill, Castleblayney.	57

Summary of Submission & Issues Raised

- Submission requests the dezoning of lands (or its capacity for any possible future development greatly reduced) on Conabury Hill, Castleblayney.
- Subject lands are zoned Proposed Residential A.
- Submission refers to a lack of suitable infrastructure, primarily a road that can cope with any further increase in traffic which is a health and safety matter.

Chief Executive Response

The subject lands are zoned Proposed Residential A in the Draft Monaghan County Development Plan 2025 – 2031.

The lands are classified as Tier 1 in the Infrastructure Assessment and Settlement Capacity Audit contained within Appendix 16 of the Draft Monaghan County Development Plan 2025 – 2031. Tier 1 lands are described as ‘Serviced’ Zoned Land, comprising lands that are able to connect to existing development services for which there is service capacity available and can therefore accommodate new development.

The subject lands are located in an area predominantly surrounded by residential development and sequentially close to the town centre (approx. 800m). The subject lands have good connectivity and access to services and amenity and the zoning of same contributes to the sequential development of land from the centre of the settlement outwards.

It is noted that there is another submission (MN-C22-MCDP-68) submitted on part of the subject lands which requests a part re-zoning on the subject lands from Proposed Residential A and to ‘Recreation/ Amenity’. It is important to note that this request corresponds with the 2007-2013 Development Plan which included a ‘Local Landscape Policy Area’ on the subject lands. The subsequent development plans, the 2013-2019 and 2019-2025 County Development Plan designated the subject lands as Strategic Residential Reserve.

It is recommended that the lands be retained within the settlement envelope of Castleblayney and zoned as Proposed Residential A. However, in response to MN-C22-MCDP-68 it is proposed to include a Landscape Protection/Conservation zoning on part of the site to allow for a landscape buffer.

Chief Executive Recommendation

Part re-zone of ‘Proposed Residential A’ zoning to ‘Landscape Protection/Conservation’.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-19</u>	JC Developments (NI) Ltd c/o Gensis Planning	Annahale and Onomy, Castleblayney	58

Summary of Submission & Issues Raised

Subject Lands:

- The subject lands cover approximately 3.642 hectares of land located at the eastern environs of Castleblayney Town and to the south east of the Town Centre.
- The subject lands are located along the northern boundary of the N53 and access to them is available through the existing entrance at Church Heath.
- The subject lands are being developed pursuant to planning permission 18/368.
- An Extension of Duration of this permission is currently under considered by the Planning Authority (24/9009).
- The subject lands are currently zoned Proposed Residential B and Strategic Residential Reserve. Applicant is seeking a rezoning of the lands to Proposed Residential A.
- As planning permission has been granted for a residential development at this location, it is contended that the subject lands are regarded as Tier 1 which could be developed to deliver a high-quality residential development which enhances the environment.

Sequential Development

- The author contends that the subject lands is appropriate in terms of sequential development give:
 - That the subject lands has an extant permission
 - The subject lands are currently being developed
 - The subject lands are serviced.
 - The subject lands are sequentially the next parcel of lands available for development along the Dundalk Road
- The subject lands are should therefore be zoned as Proposed Residential A in advance of other parcels in the Town given the in-situ services and the extent of the works already carried out on the site.

National Policy Context and Draft NPF Review 2024

- Submission provides a summary of National policy context and contends that zoning the subject lands as Proposed Residential A, would be wholly consistent with a number of objectives of the NPF and the overarching national planning policy to increase residential development at appropriate locations, and particular given the fact that the subject lands have the benefit of an extant permission.
- Submission references the review of the National Planning Framework, and the draft revision published in July 2024 and in particular references the National Population Growth Target which has increased from 5.8 million to 6.1 million by 2040.

Regional Policy Context

- Submission also provides the Regional Policy Context and notes that the subject lands are appropriate for residential zoning as envisaged by the Northern and Western Regional Spatial and Economic Strategy and is consistent with objectives RPO 177 and 178.

Local Policy Context- Monaghan County Development Plan 2019-2025

- The subject lands are currently zoned as 'proposed Residential B' and 'Strategic Residential Reserve'.
- Section 28 Development Plan Guidelines have a policy objective that sets out that lands currently zoned should not be de-zoned.
- The author contents that the lands can assist in the strategic growth of Castleblayney and be zoned as Proposed Residential A given that a live permission exists on the site and that works have recently commenced.

Monaghan County Development Plan 2019-2025 and Core Strategy

- The County Development Plan outlines 314 units allocated to Castleblayney up to 2025.
- The applicant states that since 2019, 222 housing units have been completed in Castleblayney averaging 41 units per year and is thus under the Core Strategy target which requires 53 units annually.
- The Housing Land Requirement for Castleblayney under the 2019-2025 County Development Plan was 25.9 hectares. With only 70% of the housing need fulfilled over the plan period it is clear that the figure of 25.9 hectares should be retained into the next development plan phase, particularly given the population growth is exceeding forecasts but yet the housing delivery is below the target of the Core Strategy.
- The previous allocation for housing delivery in the 2019-2025 plan should not be reduced further but instead a correct approach would be to carry forward units that have not been delivered from the previous plan into the 2025-2031 plan. This author contends that this is particularly relevant for Castleblayney Town given the viability constraints and to avoid a cyclical process of zoning less land in each development plan review.

Draft Monaghan County Development Plan and Core Strategy

- Submission notes that Section 2 of the Draft Plan identifies the uplift in population from the previous development plan and details an additional 942 persons envisaged over the plan period.
- The Housing allocation has however been reduced by 39 to 275 units.
- Despite the recognised population growth, there is no corresponding increase in housing or additional land designated for residential zoning which has resulted in a significant housing deficit.
- The Core Strategy 'target' should not be viewed as a maximum but rather a minimum, therefore requiring headroom in zoned lands for residential development.
- Overall, the Housing Land Requirement in the draft plan has been reduced to 23.18 hectares from 25.9 hectares in the previous plan. The author contends that this reduction is illogical during a housing crisis, particularly as previous objectives were unmet and population growth must be considered.
- The reduction in the housing allocation for Castleblayney is not justified given:
 - The CSO figures informing the CDP are outdated based on the period between 2016-2022.
 - The CSO figures now presented in the 2024 NPF revision and also the ESRI publication "Population projections, The Flow of New Households and Structural Housing Demand" shows a significant increase in population across the State that has not been captured into housing forecasts.
 - The CSO (Population and Migration Estimates- August 2023 and 2004) estimates that the population of the State increased by circa 196,300 people (or 3.7%) between April 2022 and April 2024 which suggests that circa 78% of the draft revision NPF 250,000 population uplift for 2022-2040 has already been reached in the past 2 years.
 - Ireland's population increased by 387,274 or 1.312% year on year between Census 2016 and Census 2022. If this growth were to continue, it would result in a total national population of circa 6.51 million people by 2040, equating to an increase of 1.36 million people on the 2022 Census. This compares to an annual rate of 0.95% for the draft NPF revision.
 - If the 2016-2022 growth rates were continued, the population in 2040 would be circa 411,000 persons higher than provided for in the draft NPF baseline projection.
- The author contends that these population growth figures need factored into the Core Strategy and also the Draft County Development Plan going forward with an associated increased and headroom in the provision of zoned residential lands to meet market demand for scheme housing.

- The submission states that the uplift in population as per the Draft CDP is restrictive, and conservative given the emerging census and demographic trends captured in both the NPF review and ESRI publications.
- Submission references the ESRI publication ‘Population Projections, The Flow of New Households and Structural Housing Demand’ (July 2024) document and with respect to same notes the following:
 - At a national level, in the baseline population scenario, the population is expected to increase by 922k between 2022 and 2040, resulting in a total population of over 6.106 million people by the end of the period.
 - This implies significant overall population growth of 1.0 per cent on an annual average basis, which is high relative to other countries.
 - At a regional level, while all regions are expected to experience population growth over the projection horizon, the Eastern and Midlands region is expected to experience relatively higher growth, concentrated in the Dublin and Mid-East regions, while the Northern and Western and Southern regions are expected to experience relatively lower population growth.
- Having regard to the above, the author states that given Monaghan County location proximate to the Eastern and Midlands Region, Castleblayney should not be constrained in accommodating the growing population and flexibility should be incorporated into both zonings and policy objectives that will facilitate housing delivery in a manner that correlates with population growth and actual housing demand in the market.

Infrastructure Assessment under the Draft CDP

- On review of the Infrastructure Assessment, the author notes the entirety of the site is classified as Tier 1 and identified as land parcel CB17.
- Despite all the site being classified as Tier 1 we note there are two different zonings proposed for the site, which is not justified as there are no constraints within the site to merit why only a percentage of the land is proposed to be zoned Residential A.
- The submission notes that there is no basis for justify different zonings within the subject lands particularly as the lands are subject to a permission under 18/368.
- The zoning should be amended to reflect the Infrastructure Assessment.
- Submission also highlights that other lands, namely CB15 under the Infrastructure Assessment, are further removed from the Town Centre and proposed as Residential A.

Development Plan Guidelines for Planning Authorities, 2022

- Submission highlights that the Guidelines require the sequential approach to the zoning of lands particularly for lands which have capacity to deliver residential units.
- Submission refers to Section 4.4.1 of the Guidelines which states that housing land which is serviced and zoned should not be subject to de-zoning.
- The author therefore contends that the proposed de-zoning of the subject lands (in part) is inconsistent with the policy objectives outline in Section 4.4.1 of the Guidelines.
- The Guidelines clearly require that maintaining zoned land which can contribute to meeting the housing demand, especially during times of urgent housing need.
- The Guidelines also highlight the requirement for sequential development of land and the submission refers to the series of Steps for Sequential Test in Residential Zoning in Settlements as stated within the Guidelines.
- In summary, the submission states that the proposed zoning of the lands is not consistent with Section 6.2.3 or the policy objective of the Guidelines as other lands which are further removed from the Town Centre are proposed as residential in advance of the subject lands.

Summary and Conclusion

- The subject lands have been deemed acceptable for residential development under permission references 18/368. We highlight this is a live permission with construction works commenced and an extension of duration application currently under consideration.

- There has been no change in the physical characteristics of the site and no basis for these lands not to be zoned as Residential A under the plan going forward.
- In terms of Housing delivery during the 2019-2025 CDP lifespan Castleblayney has only completed only 222 housing units since 2019, which equates to an average of 41 units per year. This falls significantly short of the Core Strategy's target, which sets an annual requirement of 53 units.
- This substantial failure necessitates the zoning of additional residential land in Castleblayney Town to provide for both the under-provision and population growth going forward. The Draft CDP and planning process has a role to address this under-provision of Housing Targets.
- The Core Strategy 'Target' should not be viewed as a maximum but rather a minimum; therefore, requiring headroom in zoned lands for Residential development.
- The HNDA correctly identifies that population growth is exceeding forecasts however, there is an under delivery of housing targets and it is proposed to reduce the quantum of zoned lands under the draft plan.
- Overall, the Draft CDP's HLR has been reduced to 23.18ha from 25.9ha in the previous plan. This reduction is illogical during a housing crisis, particularly as previous objectives were unmet, and population growth must be considered. Retaining the previously zoned lands is essential. Retaining the previous quantum of zoned lands is therefore proper planning and the approach should not be to base the Core Strategy on population growth trends during Covid but also the need and under-supply of Housing in the Town needs factored in.
- The proposed de-zoning of the subject lands is inconsistent with the policy objectives outlined in Section 4.4.1 of the Development Plan Guidelines and National Policy.
- The guidelines clearly require maintaining zoned land that can contribute to meeting housing demand, especially during times of urgent housing need.
- The proposal under the Draft CDP to de-zone the lands (in part) contradict the policy objective in the Development Plan Guidelines both in terms of de-zoning and sequential development requirements.
- The site not being Proposed Residential A lands is contrary to the Infrastructure Assessment which classifies the entirety of parcel CB17 as Tier 1.
- The delivery of the scheme as per permission 18368 is in conjunction with Tuath; an approved Housing Body (as agreed with Housing Section in Monaghan Co Council). It is therefore imperative that the lands are zoned Residential A going forward.
- The Planning Authority should designate the subject lands as outlined in this submission as suitable for zoning 'Proposed Residential A'.

Chief Executive Response

The submission requests the rezoning of lands from 'Proposed Residential B' and 'Strategic Residential Reserve' to 'Proposed Residential A'.

The subject lands are located within the settlement envelope of Castleblayney and are identified within the Infrastructure Assessment as Tier 1 'Serviced Zoned Land' (reference CB17).

The Core Strategy of the County Development Plan recognises the role of settlements in driving the development of the County and identifies the scope of development possible for the County, while remaining consistent with National and Regional policy. It also identifies the quantum and location of development for the plan period, consistent with the population targets and settlement hierarchy that reflects the availability of existing services, planned investment, sequential development and environmental requirements.

Within the Settlement Hierarchy as set out in the Draft Development Plan 2025-2031, Castleblayney is designated as a Strategic Town due it is existing population base and its infrastructural capacity to

accommodate new residential and commercial development. The settlement envelope designated around Castleblayney has been done so to manage development in a sustainable manner and restrict urban sprawl and the merging of distinctive areas as reflected within Objective SSO12.

It is recommended that the subject lands are zoned 'Proposed Residential B' to provide for the development of lower density houses which may provide suitable housing to meet the needs of people who might otherwise seek to build a one-off dwelling in the rural area.

Lands zoned as Strategic Residential Reserve within the five main towns of the County have been done so to facilitate the longer-term growth needs of the County. Given their strategic location, it is considered the retention of the Strategic Residential Reserve zoning on part of the subject lands will afford for potential development beyond this plan period. It is important therefore that these lands are protected for the long term expansion of Castleblayney.

On this basis, the subject lands are most appropriately zoned as 'Proposed Residential B' and 'Strategic Residential Reserve'.

Chief Executive Recommendation

No amendment recommended.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-24</u>	Concra Wood Golf and Country Club Plc	Concra Wood	N/A

Summary of Submission & Issues Raised

- As a premier golfing and tourist attraction in the region, the submission notes that Concra Wood Golf and Country Club is committed to supporting Monaghan’s growth and sustainable development, particularly in areas which foster tourism, economic growth, and community well-being.
- The submission requests the inclusion of policies and zonings which would facilitate the development of accommodation facilities at Concra Wood Golf Club.
- The submission justifies the necessity for accommodation under the following criteria:
 - Increase in Visitor Demand: Concra Wood attracts a significant number of tourists, including golf enthusiasts, anglers, and leisure travellers. The lack of on-site accommodation options limits the club’s ability to host events, tournaments, and extended golf holidays, angling events that could contribute significantly to the local economy.
 - Support for County Tourism Goals: Monaghan County’s tourism strategy emphasises the importance of enhancing visitor experiences to increase overnight stays and spending in the area. By providing accommodation, Concra Wood can play a critical role in meeting these goals, positioning itself as a unique destination that extends visitors’ length of stay and encourages further exploration of the region.
 - Economic Impact on Local Businesses: Extended stays at Concra Wood would naturally result in more revenue for local businesses, including restaurants, shops, and other service providers in Castleblayney and surrounding areas. This multiplier effect would benefit the county’s economy and create employment opportunities, particularly in the hospitality sector.
 - Event and Retreat Opportunities: On-site accommodation would enable Concra Wood to host corporate retreats, weddings, and other events that currently cannot be facilitated due to limited lodging options. Such events would not only increase direct revenue but also enhance the county’s reputation as a destination for special gatherings
- The submission notes that Failte Eireann is supportive of the initiative to increase facilities at this location.
- The submission outlines the suitability of the facility for accommodation development:
 - Natural Setting and Aesthetic Appeal: Situated on Lough Muckno, Concra Wood offers panoramic views of the lake and surrounding woodlands, making it a highly attractive location for visitors seeking tranquillity and scenic beauty. Accommodation facilities here would align with the county’s objective to leverage natural landscapes to enhance visitor experiences.
 - Existing Infrastructure and Accessibility: Concra Wood Golf Club is well-established, with existing road access, utilities, and ample space for controlled, phased development. The proximity to Castleblayney and main transport routes, including easy access from Dublin and Belfast, makes it an accessible yet secluded location, ideal for a destination-oriented development.
 - Land Availability for Sustainable Development: Concra Wood has sufficient land to accommodate a range of development options, from modest lodge-style accommodations to a full-service boutique hotel. This allows for a flexible approach that can be carefully planned to preserve the natural environment and maintain the aesthetic appeal of the location.

- Alignment with Sustainable Tourism Practices: The development would be designed in alignment with best practices for sustainable tourism, ensuring that environmental impact is minimised. This could include energy-efficient buildings, low-impact landscaping, and responsible waste management, which would reflect Monaghan County Council’s commitment to sustainability.
- The submission provides details of a proposed development concept:
 - Phase 1: Lodge-Style Accommodations: Small-scale, lodge-style accommodations in the initial phase would allow Concra Wood to increase its capacity for short-term stays, testing demand while creating a unique visitor experience.
 - Phase 2: Boutique Hotel and Event Centre: Based on the success of the initial phase, the development could expand to include a boutique hotel with an event centre, suitable for hosting corporate retreats, weddings, and tourism-based events that further promote Monaghan County as a destination.
 - Phase 3: Enhanced Amenities and Experiences: Additional recreational amenities, such as wellness facilities, hiking trails, and water-based activities on Lough Muckno, would complement the golf and accommodation facilities, making Concra Wood a comprehensive destination for leisure and tourism.
- The submission outlines the possible economic and social benefits which would result from the provision of additional facilities:
 - Job Creation and Economic Growth: The construction, operation, and maintenance of accommodation facilities would create direct employment opportunities and foster skills development within the community. Additionally, increased visitor spending would support local businesses and services.
 - Tourism Diversification: Adding accommodation at Concra Wood would diversify Monaghan's tourism offerings and attract visitors year-round, reducing the seasonality that can challenge rural tourism destinations.
 - Community Engagement and Well-being: By attracting a broader visitor base, Concra Wood would provide a community hub, supporting wellness and recreation for residents and visitors alike, enhancing the quality of life for all.
- In conclusion the submission notes that the inclusion of accommodation development at Concra Wood Golf Club aligns with the council's objectives of enhancing tourism, supporting economic growth, and creating sustainable, high-quality developments that leverage Monaghan’s natural assets.
- Concra Wood’s unique setting, infrastructure, and commitment to sustainable practices make it an ideal location for accommodation development.
- The author strongly urges Monaghan County Council to consider this proposal favourably, recognising the value it brings to the county and its residents.

Chief Executive Response

Concra Wood Golf and Country Club is located outside the settlement envelope of Castleblayney and as a result, no specific zoning objective applies to the facility.

The Development Plan recognises the importance physical recreation plays in everyday life and wellbeing. This is reflected in objective CFO 5 which seeks *‘to promote the assessment, provision, improvement and expansion of sports facilities within the County, subject to normal planning criteria and the proper planning and sustainable development of the County’*. More specifically, the Development Plan recognises the regional importance of Concra Wood Golf and Country Club and seeks to promote it as a premier golf attraction and support the development of associated facilities to strengthen this recognised asset. Additionally, Objective CBO 10 seeks *‘to prepare and implement a Masterplan and Development Framework for Lough Muckno and its environs which will act as a blueprint for its evolution as an exemplar recreational and amenity facility, having due regard to*

constraints and sensitivities associated with the area and relevant environmental protection requirements.'

The Masterplan and Development Framework shall prioritise actions and outline a phased delivery of interventions over its 10-year life. It shall include clearly identified objectives, policies, actions and projects together with measurable targets and milestones for delivery, where appropriate, and will act as a blueprint for the evolution and sustainable development of Lough Muckno and its environs as an exemplar recreational and amenity facility for Castleblayney and the wider border region.

Whilst the Council notes the important role Concra Wood Golf and Country Club plays as a tourist destination, and broadly supports its development to include tourism accommodation, it is considered appropriate that the issues raised are further considered as part of the proposed Masterplan and Development Framework.

It is noted that Concra Wood Golf and Country Club is accessed directly via the N53 National Route. Any future development proposals will therefore be considered against the Department of the Environment, Community and Local Government 'Spatial Planning and National Roads Guidelines'.

Chief Executive Recommendation

No amendment recommended.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-35</u>	IAT Futures c/o Genesis Planning Consultants	New Street Convent of Mercy, Castleblayney	59

Summary of Submission & Issues Raised

Purpose of Submission

- In preparing submission, the subject lands have been analysed in the context of the National Planning Framework, the Section 28 Guidelines ‘Architectural Heritage Protection’, the Regional Spatial Economic Strategy for the Region (RSES) and the draft CDP as published.
- The analysis undertaken identified a number of areas of interest which demonstrate that the subject lands should not be zoned as ‘Community Services/Facilities’ going forward and greater flexibility needs incorporated into the land use matrix to facilitate redevelopment and sustainable use(s) going forward.

Subject Lands in Context

- The lands are currently zoned as ‘Community Services/Facilities’ as per the current CDP 2019-2025. This is a long-established premises, which was the former Convent of Mercy.
- The lands have recently been acquired by IAT Futures.
- The lands were formerly in use by the Convent for residential and education purposes.
- Since ownership has changed in late 2024, it is not appropriate for this zoning to be retained going forward under the 2025-2031 Draft CDP.

Land Use Zoning Matrix & Draft MCDP 2025-2031

- Submission includes Table 9.3 of the Draft CDP.
- The submission notes the land use zoning objective for ‘Community Services/ Facilities’.
- The submission highlights where the draft CDP refers to Other Uses:
‘Proposed uses that are not listed in the land use zoning matrix will be considered on the merits of the individual planning applications having regard to the most appropriate use of a similar nature indicated in the Land Use Zoning Matrix. Uses that conflict with the general overall objective of the zoned area will not be permitted’.
- Reference made to section 9.3 of the Draft Development Plan, ‘Compact Growth, Consolidation and Urban Regeneration’.
- It is the intent of the landowner to redevelop the entire land holding, by adopting the current Protected Structure for reuse along with development of the associated lands.
- Feasibility and design proposals are not yet finalised, so the Draft CDP needs to provide for a flexibility for a mix of uses going forward.
- It is important for the zoning(s) and Land Use Matrix for these lands to facilitate a Mixed-Use development as this site can achieve both sustainable re-use of a historic site and which can also be a catalyst for further development of the Town.

Architectural Heritage Protection: Guidelines for Planning Authorities

- Submission highlights the existing protected structure on-site. Submission makes reference to the above-mentioned guidelines where they state:
‘On the whole, the best way to prolong the life of a protected structure is to keep it in active use, ideally in it’s original use. Where this is not possible, there is a need for flexibility within development plan policies to be responsive to appropriate, alternative uses for a structure. A

Planning Authority should carefully consider any proposed change of use and its implications for the fabric and character of the structure’.

- Going forward, the proposed zonings under the Draft CDP should provide flexibility, particularly so given the change in ownership in 2024 and the former use as a convent and school will not be continued.

Other Matters

- Note that the Draft zoning for the subject lands is ‘Community Services/facilities’ and this is a generic zoning applied to other CS lands elsewhere in the Town.
- Having reviewed the quantum of CS lands elsewhere in Castleblayney, submit that this being ‘Edge of Centre’ is distinguishable from other CS lands further removed from the Town Centre.
- The site is also distinguishable given that ownership has changed and it now privately owned, and will not be used for civic purposes, as with other CS lands.
- In this context, it is appropriate for the site to be designated as an ‘Opportunity Site’ with a zoning matrix that recognises both the ownership and locational opportunities and provides a context for flexibility in re-development.
- Reference made to a scenario being dealt with under the Donegal County Development Plan 2024-2030 which incorporates suggested approach to including opportunity sites.
- To avoid a Land Use Matrix being altered for all CS lands in Castleblayney, submit that such a scenario for a Key Site Objective to be applied to the subject lands.
- This approach will avoid undesirable ‘broad’ zonings applying to all CS lands, but appropriately designate this site as an Opportunity Site with a land matrix providing for a mix of uses to include for Residential and commercial uses.

Summary and Conclusion

In summary, this submission requests:

- That the proposed zoning is amended to ‘Opportunity Site 1’ going forward with a broadened range of potential uses.
- That the use classes associated with the zoning matrix be amended to provide for Residential, Residential Home, Retirement Home, Nursing Home, Assisted Living, Hotel, Hostel and to have a more dynamic range of ‘Open to Consideration’ uses, such as Renewable Technology, Business, Technology, Enterprise and Training’.

Submit that these amendments would provide for flexibility on how this strategic parcel of lands incorporating a Protected Structure can be developed in a manner that would benefit Castleblayney as a whole. It would also ensure that a key site objective would allow for the consideration of a mixed-use development.

Chief Executive Response

The submission centres on the request for the subject lands to be rezoned from ‘Community Services/Facilities’ to an ‘Opportunity Site’ and a revision to the Land Use Zoning Matrix.

Section 9.2 of the Draft Development Plan sets out Land Use Zoning Objectives in respect of each area identified on settlement maps, relevant to this submission is Map CYDP1 – Castleblayney Town. The Draft County Development Plan does not include ‘Opportunity Site’ as a land use zoning objective. The land reserved for relevant land use zoning objectives within Castleblayney, in particular the town centre, together with related planning policies and objectives are considered to adequately accommodate appropriate mixed use/residential/town centre related uses within the town during the lifetime of the development plan and it is considered that there is no justification to include a further land use zoning objective. In addition, it is also not considered appropriate to revise the land use zoning

matrix as submission requests. Table 9.1 of the Draft Development Plan protects the land use zoning objectives and ensures that development types are directed to the most appropriate locations, i.e those reserved for specific uses.

It is noted that the submission refers to the subject lands having recently changed ownership, however, land ownership is not a consideration in the zoning of lands. It is acknowledged that the subject lands occupy an important location within Castleblayney, in close proximity to the town centre. As such, any future development of the subject lands would require a review of the entire site, with a concept masterplan provided to demonstrate how the comprehensive redevelopment of the entire site may be achieved, having regard to the constraints and sensitivities of the site and associated protected structures.

Chief Executive Recommendation

No amendment recommended.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-54</u>	Lisa Morgan	Lands at Tullynacrunut, Castleblayney	60

Summary of Submission & Issues Raised

The submission requests the extension of Castleblayney Town Boundary to include an existing domestic entrance to family lands.

Planning History

- Planning application Ref No. 22/360 was withdrawn, as Transport Infrastructure Ireland (TII) recommended refusal for intensification of use of an existing access which was considered dangerous
- This despite several comprehensive traffic reports mitigating against this risk from specialist firms, when examined further, the involvement of TII hinged on the fact that TII jurisdiction extends from the roundabout on the N2 where it branches to the N53 onto which we currently exist from our family dwelling.

Road Network

- We see the implementation of the 2025 – 2031 Monaghan Co. Development Plan as a solution and an opportunity to have the Castleblayney town boundary extended to a point which will include the existing entrance to my family home and remove any third party control from TII.
- This is not a dangerous junction. It is well set back with public footpath on either side and ample sightlines.
- The extension of the town boundary is within the gift of the local authority and already extends beyond our site to the South where it encompasses the Old Coach Road which has been developed extensively over the years permitting access onto a roadway which also terminates on the N53.

Town Boundary

- We would respectfully request that this opportunity is used to modify the Castleblayney town boundary in order to include our domestic entrance within the town boundary and take back control of the decision to grant planning or otherwise to local level.
- We are a local family with a simple and essential ask and that is that we are permitted to construct our family dwelling on family lands in the community we reside and work.
- I am committed to serving my community and country and I need the Monaghan Co Development Plan to listen and hear my voice and to enable me to live and reside in my own community.
- The housing crisis in Ireland is well documented and we do not want to be a statistic in this debate.

Chief Executive Response

The submission requests the extension of Castleblayney Town Boundary to include an existing domestic entrance to family lands.

The submission relates to lands at Tullynacrunut, Castleblayney with access onto the National Primary Road N53. The subject lands are outside the settlement envelope of Castleblayney.

The submission requests an extension of the Castleblayney Town Boundary to allow for development of a single house with access onto a private lane.

On the basis that the location is outside the settlement envelope, it is considered appropriate to retain the existing settlement envelope unaltered.

Chief Executive Recommendation

No amendment recommended.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-68</u>	Brian Sherry	Tullynacrunnatt, Conabury	61

Summary of Submission & Issues Raised

- This submission relates to lands at Conabury & Tullynacrunnatt, Castleblayney, Co. Monaghan. Subject lands are identified in Appendix A.
- Propose that lands identified be partially zoned objective 'Recreation/ Amenity' upon adoption of the Monaghan County Development Plan.
- Specifically requests that a green area is retained in front of houses. This green area is integral to the community, providing aesthetic value and environmental benefits.
- Request that comments are taken into consideration in the preparation of the new Monaghan County Development Plan.

Submission states that the planning regulations have been thoroughly reviewed and the proposal is justified on the following reasons:

1. Environmental Benefits: The green area will contribute to the local ecosystem, providing a habitat for wildlife and improving air quality.
2. Community Well-being: The green space will offer a recreational area for residents, promoting physical activity and social interaction.
3. Aesthetic Value: Maintaining the green area will enhance the visual appeal of the neighbourhood and overall satisfaction among residents.
4. Health & Safety: Any new development coming out onto the existing Conabury Hill will only add further to the volumes of traffic, the existing road isn't capable of accommodating the current road traffic levels. This road acts as a link road between all the Primary and Post Primary Schools within Castleblayney as well been the main traffic artery for the residential estates of Rosevale, Knocktornagh and Ard Na Lorgan, adding any additional traffic will require substantial road infrastructure development to accommodate the increase in traffic volumes.

Request that the following matters be considered and incorporated into the Monaghan County Development Plan 2025-2031:

- i. The subject site has been zoned in the past for low density residential use, including the grant of planning permission, which never commenced.
- ii. A green area as identified on Appendix A was incorporated into these lands in the past and the subsequent grant of Planning Permission, Ref No: 08/ 986.
- iii. It is therefore considered that this site given its location and planning context and history attached to same, that the carrying out of residential development of these lands will be consistent with this submission and nearby residential developments thus utilising the land in a most efficient and sustainable manner.

Chief Executive Response

The subject lands include two lands zonings, 'Proposed Residential A' and 'Proposed Residential B'. It is also noted that there is another submission (MN-C22-MCDP-7) submitted on that part of the subject lands which are Proposed Residential B. This submission requests a part re-zoning on subject lands from Proposed Residential A and Proposed Residential B to 'Recreation/ Amenity'.

The comments made in respect of the planning history (Planning Ref 08/986) on the subject lands are acknowledged. It is important to note that the previous permission on these lands were in accordance with the land use zoning of the subject lands as defined by the Development Plan at that time, with the 2006-2013 Development Plan including a 'Local Landscape Policy Area' on the subject lands. The

subsequent development plans, the 2013-2019 and 2019-2025 County Development Plan designated the subject lands as Strategic Residential Reserve.

The rezoning of part of the subject lands to 'Landscape Protection/Conservation' is considered an appropriate amendment which shall be recommended.

Chief Executive Recommendation

Part re-zone of 'Proposed Residential A' zoning to 'Landscape Protection/Conservation'.

Rezone from 'Proposed Residential B' to 'Strategic Residential Reserve'.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-98</u>	Aldi Stores (Ireland) Limited c/o John Spain Associates	Castleblayney	N/A

Summary of Submission & Issues Raised

Introduction

- This submission primarily relates to retail policies and objectives set out in the draft Plan, the Retail Strategy and more specifically, retail provision in Castleblayney.
- Aldi Stores (Ireland) Limited currently operate a single store in Carrickmacross and is seeking to expand its retail offer across the region.
- Aldi has been seeking opportunities for convenience retail development opportunities in County Monaghan in accordance with its strategic plan to add at least 30 new stores and over 1,000 jobs to the c. 160 stores currently operating throughout Ireland.
- This will assist in enhancing and improving the convenience retail environment in Monaghan by the addition of variety and increased choice, in accordance with the Retail Planning Guidelines 2012 which promote healthy retail competition.
- Aldi are actively searching for development sites in Castleblayney and seek to ensure that the adopted Monaghan CDP 2025-2031 makes appropriate provision for convenience retail and medium supermarkets at suitable locations within the town.
- While Aldi's preferred location for trading is the town centre in accordance with the Retail Planning Guidelines, there are limited opportunities for an Aldi store within lands zoned 'town centre' in Castleblayney owing to the availability of land, insufficient site size, heritage and existing and adjoining development which add to constraints.
- In this regard, it is submitted that the CDP and its associated land use zoning maps make provision for additional convenience retail provision across County Monaghan and within Tier 1 and 2 settlements in the Retail Hierarchy including Monaghan Town and Castleblayney.
- The population of County Monaghan has increased by 6.4% in the intercensal period between 2016 and 2022 to 65,288, with a projected population of 71,516 in 2031. Table 2.4 of the draft Plan projects an additional population of 6,228 in the County over the Plan period, with an additional 1,818 units required to accommodate the population increase.
- It is noted that the draft revised National Planning Framework 2024 introduces significantly increased population projections in the period to 2040, with a target of c. 50,000 dwelling completions per year. These updated figures will inform the RSES for the Northern & Western Region and subsequently development plans. This will likely require greater levels of growth to that set out in the draft Core Strategy of the Monaghan CDP and should be fully accounted for in the adopted version of the Plan.
- It is noted that the Retail Strategy 2016-2022 remains in place in the draft Plan, however it is acknowledged that the strategy should be reviewed and updated, taking account of the Town Centre First Policy. Aldi support the review of the existing Retail Strategy to provide a current assessment of need, as well as health checks on town centres across the county.

Population & Core Strategy

- Submission includes Core Strategy Table 2.5 of the draft Development Plan, which sets out housing targets for the plan period based upon population projections.
- Submits that it is important to note that the draft revised NPF includes increased population projections for the period up to 2040, which will be required to be incorporated into development plans upon the publication of the final NPF expected in Q4 2024.

- National Policy Objective 3 of the draft revised NPF sets out “approximately 150,000 additional people between 2022 and 2040 (c. 210,000 additional people over 2016-2040) i.e. a population of just over 1 million” in the Northern & Western Region.
- In respect of Monaghan and the North East of the Northern & Western Region, the draft revised NPF seeks to address “economic resilience” and continued focus on cross-border movement and trade with “new opportunities to leverage employment and for sustainable population growth”.
- Monaghan will also benefit from enhanced connectivity through significant investment in the A5 North-West transport corridor upgrade and related N2 and road upgrade.
- In this respect, it is recommended that the Monaghan CDP 2025-2031 takes account of the increased population targets in the revised NPF upon publication and make provision for enhanced growth in the county over the Plan period.
- This increased population will require commensurate growth in convenience retail to meet a growing demand, whilst also contributing to enhanced competition and a healthy retailing environment. Aldi seeks to expand their presence in County Monaghan to respond appropriately to the projected population growth as set out the draft Core Strategy and as per the revised NPF and RSES figures when published.

Retail & Employment

- It is noted that the Retail Strategy 2016-2022 remains in place in the draft Plan, however it is acknowledged that the strategy should be reviewed and updated, taking account of the Town Centre First Policy.
- Aldi support Retail Objective RTO1 of the draft Plan to “prepare a new Retail Strategy for the County within the lifetime of the Monaghan County Development Plan 2025-2031”. This is required to provide a current assessment of need, as well as health checks on town centres across the county.
- The draft Plan notes the strong employment base in County Monaghan, with jobs equal to or exceeding resident worker populations in Monaghan Town, Carrickmacross and Castleblayney.
- Aldi stores create up to 30 full time jobs on a year-round basis. In addition, approximately 50 no. construction jobs would be created during the development of the stores. In this respect, Aldi are well positioned to contribute to consolidating the robust employment base in the county, create further jobs and drive competition in the retail sector, aligning with the objectives of the NPF for the county.
- Aldi is supportive of the Retail Hierarchy set out in the draft Development Plan.
- Aldi supports the draft Plan which states:
*“it is expected that the majority of new future retail developments in the County will be in the Tier 1 and Tier 2 towns of Monaghan, Carrickmacross and Castleblayney. The town centres are deemed to be the focus and preferred location for retail development...
 Monaghan Town has been designated as the County’s Key Town due to its strategic location and increasing population projections, it is therefore anticipated to attract substantially more future retail applications than other settlements in the County. Carrickmacross, given its proximity to major population centres, growing population, larger hinterland, established market and lower vacancy levels, may also draw further new retail floorspace.”*
- Aldi stores constitute medium sized convenience discount food stores and are considered appropriate in a Tier 1 and Tier 2 settlements in the hierarchy. Tier 3 settlements may also be suitable for Aldi stores at appropriate locations to enhance the retail environment as set out in the draft Plan.
- Aldi is supportive is Retail Objective RTO3. It is noted however that in some locations across the Tier 1 and Tier 2 settlements, the availability of appropriate and viable sites at town centre zoned lands to accommodate Aldi stores is curtailed.

- This is typically due to site size, existing buildings across multi-ownership, access, natural and built heritage, floor risk and market availability.
- In this respect, Aldi respectfully requests that Monaghan County Council ensure that sufficient 'town centre' and 'edge of centre' zoned lands are included in the adopted version of the County Development Plan to accommodate retail development of appropriate scale at suitable locations to serve an expanding population.

With regard to the extant Retail Strategy, Aldi is supportive of the following statement which remains relevant:

- *“What were considered ‘discount foodstores’ under the previous Retail Planning Guidelines are now categorised as ‘convenience shops’ within the current Retail Planning Guidelines, 2012. These stores offer alternative choice as consumers spread their convenience shopping between any numbers of different stores. An alternative shopping offer is therefore important if County Monaghan is to reduce retail leakage to other areas, including areas north of the border.”*

Submission states, in this respect, the enhanced provision of Aldi stores across County Monaghan will support the 'alternative shopping offer' and assist with reduced retail leakage to other areas and into Northern Ireland. This will also enhance the competitive retail environment in Monaghan and improve variety and choice for customers.

- The Retail Strategy notes that in relation to convenience retail *“Monaghan, Carrickmacross and Castleblayney saw substantial increases in convenience floorspace, Monaghan seeing a 45% increase, Carrickmacross an 83% increase and Castleblayney a 170% increase during the period 2003 – 2015”*, with very low levels of vacancy observed in Monaghan Town and Carrickmacross and vacancy of 17% in Castleblayney.
- A review of the Monaghan planning search online tool for the 5 years from 2019 to 2024 confirms a very limited number of permissions for convenience retail within this period.
- With the exception of permissions for new Lidl stores replacing existing stores in Castleblayney and Carrickmacross, providing a net increase in floor area of c. 700 sqm, there has been very little significant grants of permission for new convenience retail floor space across the county.
- A notable trend has seen applications seeking change of use away from existing retail uses.
- Submission notes that the Retail Strategy projected an additional 5,502 sqm of convenience retail floor space by 2022 highlighting the need for additional and alternative convenient retailers *“to meet the needs of existing and future population and expenditure across the county”*.
- Submits that this additional floor space requirement will have further increased having regard to the low number of planning permissions granted for new convenience retail in the period since 2019.
- The Retail Strategy and draft Plan both note the importance of preventing further expenditure leakage to other retail locations and also across the border. While this primarily relates to comparison and bulky goods retailing, it is important to ensure that convenience leakage is also addressed. Additional convenience retail provision at appropriate locations will increase footfall to settlements through additional linked trips and result in spin off benefits for existing retailers whilst creating potential for additional shops.
- This important issue is required to be addressed through the planning policy framework at County level.
- The CSO Census 2022 data confirmed a population of 65,288, a c. 6.4% increase in the intercensal period. The Core Strategy of the draft Plan projects a population of 71,516 to 2031.
- An increase in population countywide of 6,228 over the Plan period to 2031 based on the expenditure per capita figure of €3,652 as set out in Table 4.5 of the Retail Strategy will result in an additional €22,744,656 of surplus expenditure into the county up to 2031.

- This is in addition to the available estimated surplus of €49,654,320 in 2022, which has not been addressed due to limited convenience retail activity in recent years, with the additional floorspace requirements subsequently increasing. In reality, the available convenience retail expenditure surplus may be larger given the 2021 national expenditure per capita figure for convenience goods is estimated at €4,226 based on the CSO's Annual Services Inquiry (ASI), with the figure used in the Retail Strategy considerably lower.
- This highlights the requirement for the preparation of a new Retail Strategy for County Monaghan which Aldi would welcome in the short-term following the adoption of the new CDP.
- Aldi is supportive of the statement within the Retail Strategy which states *"in line with the Guidelines the preferred location for retail development is within existing town centres and the identified retail hierarchy. Development proposals not according with this must demonstrate compliance with the sequential approach and provide a Retail Impact Statement"*.
- Aldi's preferred location for operations is at town centre locations. However, as a medium sized supermarket, it is possible for Aldi stores to be located at the edge of town centres on appropriately sized, suitable sites with easy vehicular and pedestrian access and connectivity to existing established retailers. Such sites may also be considered sequentially preferable having regard to the suitability criteria set out in the Retail Planning Guidelines 2012.
- It is recommended that the Council make sufficient provision for medium-sized convenience retail stores at appropriate locations within the new Retail Strategy to ensure that the principles set out in the existing strategy to accommodate discount convenience retail as an alternative choice and to enhance competition is achieved.

Zoning Matrix

- Submission notes that the zoning matrix at Section 9.2 in the draft CDP notes 'Retail (Convenience)' as a 'Permissible' use under 'Town Centre' zoned lands only.
- Aldi request that the zoning matrix be amended appropriately to include 'Retail (Convenience)' at additional zoned lands.
- While it is noted that 'Existing Residential', 'Proposed Residential' and 'Strategic Residential Reserve' lands include 'Retail (Convenience)' as an 'Open for Consideration' use, this is likely to be curtailed in scale and very much a secondary or tertiary use to the primary residential use on the lands.
- 'Retail (Convenience)' is also an 'Open for Consideration' use on 'Existing Commercial' zoned lands which limits the potential for a medium sized supermarket due to the established uses operating from these locations at present. This poses a challenge in respect of site assembly and securing an appropriately sized premises which could accommodate an Aldi store.
- Upon review of these zoning objectives, the potential for new convenience retail stores would be severely curtailed based on the limitations set out within Table 9.1: Land Use Zoning Categories and Objectives of the draft Plan. While Aldi prefer to locate on 'Town Centre' zoned lands where feasible, these frequently consist of challenging brownfield sites which are constrained by a single or numerous of factors.
- Aldi therefore recommend that the adopted version of Monaghan CDP 2025-2031 includes 'Retail (Convenience)' as a 'Permissible' use on 'Industry / Enterprise / Employment' lands and 'Existing Employment' lands.
- This will ensure that medium sized convenience retail stores can be accommodated on additional lands which are typically closely linked to the town core in Tier 2 settlements of Carrickmacross and Castleblayney and adjacent to established residential communities in the Tier 1 settlement of Monaghan Town.
- Submission notes that the Retail Strategy refers to Neighbourhood Centres. Submission includes extract from the retail strategy, section 5.9.3.

- ‘Neighbourhood Centre’ zoning does not form part of the land use zoning matrix or appear on any zoning maps for the county. Given the limitations of town centre sites in some instances to accommodate appropriately scaled convenience retail stores to respond to the growing population, the Council may wish to consider the introduction of Neighbourhood Centre zonings proximate to established and proposed residential zoned lands to ensure accessibility for all residents.
- In the context of the Retail Planning Guidelines, Neighbourhood or District Centres are typically anchored by a convenience retail store of up to c. 1,500 sqm net retail floor area, with a range of other secondary associated retail and commercial uses serving a localised catchment removed from the town centre area. There may be opportunities for such zoning in Tier 1 and Tier 2 settlements of Monaghan Town, Carrickmacross and Castleblayney in the CDP and Aldi respectfully requests that this is reviewed by the Planning Authority in finalising the development plan.

Castleblayney

- Aldi has been actively searching for development opportunities in Castleblayney in recent years and seek to enhance the convenience retail offer in the town to support the town’s strong economic base.
- A discount food store will complement the existing retail provision in the town and provide additional variety and choice to local residents and the wider community and hinterland.
- Submission notes that the draft Plan identifies, *“Castleblayney serves a wide hinterland and provides important local level residential, retailing, social and leisure functions for the town and surrounding rural community. The town is a strategic town for the County that has significant potential for expansion and growth given its location”*.
- Submission notes Strategic Objective SHO 2 and SSO 2 of the development plan.
- Submits that the draft Plan places an emphasis on *“maintaining and supporting urban development by way of consolidation of the town centre and expansion of services to meet the needs of the locality commensurate with its position in the hierarchy”* whilst respecting the natural heritage value of Lough Muckno and its surrounds.
- Submits that development opportunities within the eastern part of the town are limited due to proximity to Muckno Park and Hope Castle, with a number of churches also located in the vicinity. Castleblayney Markes Square is a proposed Architectural Conservation Area and notes that there are a number of protected structures focused around Market Square all of which are located within ‘Town Centre’ zoned lands as per the draft Plan. This highlights the constraints for identifying a suitable and viable site within the town centre for the purposes of an Aldi discount foodstore.
- The inclusion of ‘Retail (Convenience)’ as a ‘Permissible use under ‘Existing Employment’ and ‘Industry / Enterprise / Employment’ lands would assist in facilitating a medium sized supermarket at an appropriate and accessible location within Castleblayney having regard to proposed land use zoning map for the settlement. This is particularly relevant in relation to the area around Monaghan Road given proximity to the town centre, vehicular access and existing residential development.
- Aldi recommend that the extent of the ‘Town Centre’ zoned lands within Castleblayney is reviewed and extended having regard to the constraints on this area as currently drawn to accommodate a medium sized convenience retail store.
- Recommended amendments will ensure that the strong employment base in Castleblayney is sustained and consolidated and the provision of convenience retail is accommodated in order to respond the growing population of the settlement which experienced an 8% growth in the intercensal period 2016-2022.
- Submits that they would also assist in achieving policies SHO and SSO2 to *“promote and develop”* the settlement through an appropriate addition to its existing retail provision,

adding to choice and competition and providing spin off benefits and additional footfall to existing retailers in the town.

Recommendations & Conclusion

In summary, Aldi is broadly supportive of the content of the draft Plan as it relates to retail development. However, in order to ensure that commensurate convenience retail is provided throughout the county, and in Tier 1 and Tier 2 towns in particular, to absorb the significant levels of surplus convenience expenditure and respond to low level of retail activity in County Monaghan since 2019, Aldi has proposed a number of recommendations within this submission to assist in addressing this. These are set out as follows:

1. Core Strategy

It is recommended that the Monaghan CDP 2025-2031 takes account of the increased population targets in the revised NPF upon publication and make provision for enhanced growth in the county over the Plan period.

2. Retail Strategy

It is recommended that the Council make sufficient provision for medium-sized convenience retail stores at appropriate locations within the new Retail Strategy to ensure that the principles set out in the existing strategy to accommodate discount convenient retail as an alternative choice and to enhance competition is achieved.

3. Zoning Objectives

Aldi recommend that the adopted version of Monaghan CDP 2025-2031 includes 'Retail (Convenience)' as a 'Permissible' use on 'Industry / Enterprise / Employment' lands and 'Existing Employment' lands.

4. Castleblayney

Aldi recommend that the extent of the 'Town Centre' zoned lands within Castleblayney is reviewed and extended having regard to the constraints on this area as currently drawn to accommodate a medium sized convenience retail store.

Chief Executive Consideration

The submission makes a number of recommendations and requests;

Core Strategy: The comments made in the submission regarding the revised population targets within the first revision to the NPF are noted. The Core Strategy of the County Development Plan recognises the role of settlements in driving the development of the County and identifies the scope of development possible for the County, while remaining consistent with National and Regional policy. It also identifies the quantum and location of development for the plan period, consistent with the population targets and settlement hierarchy that reflects the availability of existing services, planned investment, sequential development and environmental requirements. In response to the OPR submission, MN-C22-MCDP-126, the population projections in the Core Strategy figures have been reviewed and revised.

Retail Strategy: It is noted that the submission welcomes Retail Objective RTO 1 which commits to preparing a new Retail for Strategy for County Monaghan, during the lifetime of the Development Plan. RTO 1 is an acknowledgement that the County Monaghan Retail Strategy 2016-2022 should be reviewed and updated as necessary to ensure that it provides an up-to-date overview of the town

centres, the retail hierarchy and appropriately supports the vitality and viability of the County's towns. The revised retail strategy will be prepared taking account of the Town Centre First Policy and any town centre first plans which have been produced. How to accommodate and support discount convenient retail as an alternative choice at appropriate locations will be a key consideration of the revised Retail Strategy.

Zoning Objectives: The request to revise the zoning matrix to allow Retail (convenience) as a permissible use on 'Industry/Enterprise/ Employment' and 'Existing Employment' lands is noted. The draft Development Plan does however not include 'Existing Employment' zoning however it is assumed that the submission actually refers to 'Existing Commercial'.

Land Use Zoning Objective 6 is "to provide for new industrial, enterprise and employment generating development and to facilitate the expansion of existing industrial and employment generating enterprises". The principal permitted use on such lands are a range of employment, industry and business uses. It is important that Industry/Enterprise/Employment lands, identified as being suited to such purposes and in appropriate locations, are retained for such uses. Retail development is not considered to be an appropriate use on such lands and as such it is recommended that the land use zoning matrix not be amended as requested.

Castleblayney - Town Centre Boundary: The town centre boundary of Castleblayney, as proposed is considered to accurately reflect the established character of the town centre and its adjoining and adjacent land uses. The revised retail strategy may consider the capacity of the town centre boundary to accommodate future retail development, however, at this stage of the Development Plan it is considered that the town centre for Castleblayney as proposed, allows for sufficient retail development to be accommodated during the lifetime of the development plan.

Neighbourhood Centres

The comments made in respect of the inclusion of a Neighbourhood or District Centre, anchored by a convenience store are noted. The Development Plan has not proposed any neighbourhood or district centres. Section 5.9.3 of the Monaghan Retail Strategy 2016-2022 refers to Local Retail Units and Neighbourhood Centres, identifies that consideration should be given to the role and function of the settlement in the retail hierarchy, and where the local importance of such units can be substantiated, the planning authority should support the provision of such units.

The overarching objective of the Monaghan County Development Plan, as set out in retail objectives, seeks to locate retail development within town centres, the scale of which is commensurate with their role and function in the settlement hierarchy. It is considered that the town centres within the five main towns, with policies contained within the development, offer sufficient opportunity to accommodate retail development during the lifetime of the development plan.

The revised Retail Strategy will offer an opportunity to further review the need for neighbourhood / district centres within the County.

Chief Executive Recommendation

No amendment recommended.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-99</u>	Gerard Campbell	Market Square Castleblayney	62

Summary of Submission & Issues Raised

- Submission requests that a yard area and curtilage area be changed from 'Recreation/Amenity' to 'Town Centre'.

Chief Executive Response

The subject lands are located adjacent to the eastern boundary of the proposed town centre boundary. The subject lands lie to the rear of a residential dwelling which forms a part of a terrace of dwellings fronting onto Muckno Street. The subject lands form part of the curtilage of a dwelling.

It is important that the draft Development Plan accurately depicts existing use of land as appropriate, therefore the rezoning of the subject lands from 'recreation/ amenity' to 'town centre' is considered appropriate.

Chief Executive Recommendations

It is recommended that the subject lands are rezoned from 'Recreation / Amenity' to 'Town Centre' uses.

Rezone parcel of lands to the northwest of subject lands from 'Recreation / Amenity' to 'Town Centre'.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-102</u>	Berwat Construction Ltd c/o Armstrong Fenton Associates	Killycard, Castleblayney	63

Summary of Submission & Issues Raised

Subject Lands

- The subject lands are located west of Castleblayney town centre between the Mile Hill Road and the Shercock Road (R181), which connect to the N2 further west. The site is adjacent to the Castle Park residential development and has direct road frontage onto the Shercock Road.
- The subject land is a flat, greenfield site, currently zoned for 'Industry/Enterprise/Employment' uses under the current Monaghan County Development Plan. The existing lands abutting the site to the north are not proposed to be zoned under the current MCDP Draft Plan, thus removing the 'Industry/Enterprise/Employment' land use zoning in its entirety from this part of Castleblayney and reducing the development boundary for Castleblayney.
- The subject site, being positioned between lands zoned for Existing Residential (i.e. Castle Park to the east) and abutting, but within the development boundary for the town on its western boundary is last remaining parcel of undeveloped/uncommitted land in this western part of Castleblayney.
- It is a serviceable site, with proximate access to the N2 and town centre, and also has the benefit of a shared access arrangement with the adjoining Castle Park development.
- Submission notes that Berwat Construction Ltd has delivered the Castle Park residential development and is best placed to deliver much needed housing in Castleblayney.
- The site can be developed for housing in keeping with the established and permitted pattern of development in Castle Park, can utilise the permitted access into Castle Park from the Shercock Road and complete the Castle Park development in its entirety rather than having unused, underutilised zoned lands remaining for a number of years.
- The submission notes Castleblayney's status as a Tier 2 Strategic Town in the Core Strategy of the Draft Development Plan and notes that Table 2.6 of the Core Strategy identifies that 17.85 hectares of land has been identified to accommodate 177 new dwellings on greenfield lands within the settlement. The author has examined the lands zoned 'Proposed Residential A' and 'Proposed Residential B' and notes that no extant permission is attached to circa 13.4Ha which is 4.45Ha less than that available to accommodate 177 no. new housing units.
- Given the existing zoned status of the lands, albeit for industrial uses etc., and its position within the development boundary for the town alongside existing housing, it is put forward that the most logical approach to developing the subject site is to zone it for 'Proposed Residential' use now rather than strategic land reserve.

Strategic Considerations

- Based upon the figures set out in the Core Strategy of the Draft MCDP, the development of the subject site (circa 0.65Ha) can accommodate housing in the region of 6-12 units, which represents only circa 3-7% of the total housing allocation for Castleblayney for the lifetime of the new MCDP. To zone the subject site for 'Proposed Residential' use now, as opposed to having such a small site reserved for an indefinite period of time does not accord with the stated approach in the Draft MCDP for dealing with the current housing need and demand for the town.
- The submission notes that the subject site was previously zoned for residential land use under the 2007-2013 Monaghan County Development Plan and that it also formed part of the planning application site for the adjoining Castle Park residential development, under its original 'parent' application (Ref. 08/226). The subject site outlined in red is part of the overall and original landholding of Castle Park and is not a separate site. The author notes that

coupled with its existing and proposed zoned status, demonstrates that it is evident that this site is appropriate for development, that the most appropriate land use for same is 'Proposed Residential' and it ought to be zoned for 'Proposed Residential' land use under the new MCDP, 2025-2031.

- The submission estimates that 13.4 hectares of land is available within Castleblayney to accommodate new housing (the remaining zoned lands are committed with extant permissions in place). The Draft MCDP states that 177 no. new dwellings will be delivered over the lifetime of the new Development Plan and based upon the stated availability of 17.85Ha, this equates to a density circa 10 units per hectare. If only circa 13.4Ha is available, then that would cater for circa 134 no. new dwellings, thus leaving a shortfall of 43 housing units in Castleblayney
- The subject site is circa 0.65Ha in area and, based upon the figures set out in the Core Strategy, we estimate that the site could cater for circa 6-12 no. dwellings, which would not exceed the Core Strategy figures for growth.
- The submission contends that the site is of no current benefit, to 'strategically' reserve a site of circa 1.6acres (less than 1 Ha) for future housing when it can be developed now for a small quantum of housing thus completing the overall Castle Park development.

Proposal

- The submission requests that the subject lands are rezoned from 'Strategic Residential Reserve' to 'Proposed Residential A'.
- Given the location of the lands within the settlement envelope of Castleblayney and abutting the Castle Park development, the submission contents that this is the most appropriate and logical approach to these lands is to zone them for 'Proposed Residential' land use, which will allow the development of this site and completion of the overall Castle Park development in a timely manner.
- The submission notes that the site's location and proximity to necessary and existing services, facilities and access to meaningful and necessary physical infrastructure provides the most rational and sequential approach to the future of this site.
- Submission states that the zoning of the subject site accords with the spirit of the Planning and Development Act which requires the preparation of a Core Strategy as the location of this site accords with the policy that 'there must be cognisance of the need to consolidate urban settlements by keeping them as physically compact as possible and applying the sequential approach to land use zoning'. The zoning of this site will mitigate against urban sprawl and future development that is located beyond the footprint of existing settlements. This site should be zoned for 'Proposed Residential' land use in the new County Development Plan as it is located within the defined development boundary for Castleblayney and has been previously zoned for residential land use under previous Development Plans.

Merits of the Proposal

- The zoning of the subject site for residential land use will make lands available to accommodate much needed housing.
- The site is readily available for development, subject to permission, given that access, roads and services are all available.
- It is submitted that a logical and rational approach to future planning in Castleblayney is to zone the site for 'Proposed Residential' land use given its proximity to neighbouring existing residentially zoned lands, existing physical infrastructure, proximity to town centre and this proposal's compliance with the Core Strategy of the CDP.
- Zoning the subject site will allow for the genuine delivery of much need housing within the period of the new County Development Plan, as upon the zoning of same, there are no planning or infrastructural impediments to the delivery of housing, subject to permission, thus delivering the quantum of housing as envisaged by the Core Strategy within the lifetime of the new Monaghan County Development Plan 2025-2031.

Conclusion

- In summary, the submission requests that the following matters are considered:
 - The subject site has been zoned in its entirety in the past for residential use, including having planning permission for a residential development, the carrying out of which has commenced. The subject site is part of the overall and original landholding of Castle Park and is not a separate site. It is therefore considered that this site is best placed to deliver housing given its location, and planning context and history attached to same.
 - The carrying out of residential development of these lands will be consistent with nearby residential development thus utilising the land in a most efficient and sustainable manner, along with complying with the sequential approach to development.
 - The proposal to zone the subject site 'Proposed Residential' will complete the development of zoned lands on this overall landholding and allow for the completion of the Castle Park development in its entirety.

Chief Executive Response

The submission requests that the subject lands are rezoned from 'Strategic Residential Reserve' to 'Proposed Residential A'.

The Core Strategy of the County Development Plan recognises the role of settlements in driving the development of the County but also identifies the scope of development possible for the County, while remaining consistent with National and Regional policy. It also identifies the quantum and location of development for the plan period, consistent with the population targets and settlement hierarchy that reflects the availability of existing services, planned investment, sequential development and environmental requirements.

The subject lands comprise 0.65 hectares and are fully serviced. The lands adjoin Castle Park, a recently constructed residential development. Having regard to the ongoing development of housing in this location, it is considered reasonable that the subject lands are rezoned to 'Proposed Residential B' to facilitate the build out of the adjoining residential development and to provide for the development of lower density houses within the urban settlement of Castleblayney Town. These may provide suitable housing to meet the needs of people who might otherwise seek to build a one-off dwelling in the rural area.

To facilitate the rezoning of these lands and in order to comply with the Core Strategy and adhere to the quantum of zoning set out in the revised Core Strategy Table 2.5, approximately 1.039 hectares of Proposed Residential A or Proposed Residential B will have to be either dezoned or rezoned as Strategic Residential Reserve or for another land use. In this regard a table is appended to this report setting out the proposed changes to zonings within each of the five towns where equivalent lands proposed be zoned Proposed Residential A or Proposed Residential B are either dezoned or rezoned to facilitate the rezoning of the subject lands to Proposed Residential B.

Chief Executive Recommendation

It is recommended that the subject lands are rezoned from 'Strategic Residential Reserve' to 'Proposed Residential B'.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-111</u>	Janet Coogan	Annahale, Castleblayney, co. Monaghan.	64

Summary of Submission & Issues Raised

- This submission seeks the inclusion of lands at Annahale within the Castleblayney Settlement Envelope and zoned for Residential A.
- The submission states that the site previously contained a poultry and mushroom business on this site for over fifty years employing 20+ people and predated most of the residential developments in Annahale along the Dundalk road and Coach Road
- Lands were previously zoned in the previous plan but in May 2024 the landowner requested that the land be de-zoned due to the residential tax on zoned land until the suitability of the land was assessed for residential development. Following engagement with several engineering, surveyors and planning consultants the landowner is confident that the lands are accessible and viable for residential development.
- A topographical survey accompanies the submission.
- A justification for the zoning proposal is put forward in the submission which includes:
 - **Access:** Subject lands have access routes identified from the Coach Road with 13m+ of road frontage within the landowners ownership. Access options are demonstrated on the topographical survey map.
 - Infrastructure and Services:** Map 1 and Map 2 accompanying the submission indicates potential road and footpath access to the site, as well as existing facilities nearby such as foul sewer drainage, surface water drainage, water and electrical supply necessary for dwellings to be developed. A water pumping station and foul sewer drainage etc. all exist along the Old Coach Road with the potential to service the site.
- The site was previously used as an agricultural land for mushrooms and chickens, it is not contaminated or affected negatively in such a way that would preclude the provision of dwellings. No archaeological or historic remains have been noted on the site
- The submission states that the site is a brownfield site surrounded by residential development and is in a derelict state. Objectives contained within the Draft County Development Plan (UDO 5 and UDO 7) are referenced in the submission in support of the redevelopment of the brownfield site.
- The submission states that having regard to the existing residential developments contiguous to the subject landholding and the multitude of one off housing along both roads, the subject landholding can be regarded as an infill site.
- It is stated that the sustainable and sequential residential development of Castleblayney should be focused on existing derelict serviced/infill / brownfield/ backlands lands within the town boundary.

Chief Executive Response

The subject lands were included within the Monaghan County Development Plan 2019 – 2025 however they were de-zoned as part of the Residential Zoned Land Tax process in 2023, following a request from the landowner. The lands currently adjoin the settlement envelope of Castleblayney.

It is acknowledged that the site was previously used for agriculture, but has been disused for a number of years. 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 subject lands are located on the periphery of Castleblayney Town and the rezoning of the lands would therefore not contribute to the compact growth of the town. It is considered that there are sufficient lands located within the existing settlement envelope of Castleblayney Town which are suitable for residential development in more sequentially appropriate locations to meet the projected population increase over the plan period.

Chief Executive Recommendation

No amendment recommended.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-130</u>	Gerard Murphy	Castleblayney	65

Summary of Submission & Issues Raised

- The submission requests that the subject lands are included within the settlement envelopment of Castleblayney to reflect the zoning of the current Monaghan County Development Plan 2019-2035.
- The submission notes that the removal of the subject lands from the settlement envelopment has resulted the landowner having no access to other lands which are zoned in the Draft Development Plan.

Chief Executive Response

The submission relates to two portions of land which are located to the west and south west of Castleblayney Town Centre outside the draft Castleblayney settlement envelope. The lands are zoned in the Monaghan County Development Plan 2019-2025 as 'Industry/Enterprise/Employment'.

It is a priority of the Development Plan to promote County Monaghan as a location for economic development that is attractive and competitive in terms of inward investment as well as supporting indigenous businesses. A challenge for the Council is to assist in creating more jobs so that more people who live in County Monaghan can work in County Monaghan.

Specifically, the Development Plan recognises that Castleblayney's location on main transport corridors offers significant potential for growth in the industrial sector and this is reflected in objective CB0 2 which seeks '*to promote Castleblayney as a key industrial, enterprise and employment centre*'. An employment lands capacity analysis was prepared to inform future employment and industry zoning within the Development Plan for the plan period. As a result, approximately 93 hectares land has been zoned for 'Industry, Enterprise and Employment' development in Castleblayney which is considered sufficient to accommodate the anticipated level of industrial development in the town during the life of the Plan.

Having regard to the above, it is recommended that that the lands are not included within the settlement envelope of Castleblayney.

Chief Executive Recommendation

No amendment recommended.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-22-MCDP-147</u>	Paul McCormack c/o CS Pringle	Corracloghan, Monaghan Road, Castleblayney	66

Summary of Submission & Issues Raised

Location of Subject Lands

- The subject lands are located along the old N2 Monaghan Road, just outside the defined settlement envelope of Castleblayney.
- Over recent years the submission notes that the existing development stock has expanded out from the town along this road, creating a development of private one-off domestic dwelling houses.
- In 2005, a new foul sewerage system was constructed along the road to facilitate the existing houses in this locality and also the future development of the subject lands. Public lighting and public footpath are also located adjacent to the site.
- There are a number of existing residential units to the north west of the site and the submission notes that the inclusion of four more units on the subject lands could be considered an infill development.

New Motorway

- The N2 Motorway now by-passes the town of Castleblayney, and this has resulted in the N2 Monaghan Road to be downgraded. There is now an enormous reduction in traffic movements along this stretch of roadway. The road and existing fencing are well set back with good hard shoulders and good sight distances already available. This leaves it a lot safer for potential new residential development along this road.

Draft Monaghan County Development Plan 2025-2031

- The submission notes that the land within the vicinity of the subject lands has been zoned as existing residential and states that the subject lands have been zoned as Strategic Residential Reserve, effectively sterilising the site from being developed.
- Having regard to the Map CYDP1, the author states that there are very little lands zoned as Proposed Residential B and notes that apart from the very small areas proposed as Residential B to the rear of the Crescent Hill housing development, no other lands have been zoned as Proposed Residential B to the north of the Main Street/Mile Hill Road area.
- The submission also notes that the land to the rear of Crescent Hill is dramatically lower than the existing development and may therefore be more suitable as Proposed Residential A.
- Submission notes that serviced sites on Old Coach Road beside Old Coach Manor sold very well with only one site remaining.
- Having regard to the high contours of the subject lands, the submission notes that 4 number sites would be proposed. The development would be similar in size and character to the adjacent residential stock on each side.
- The submission contends that the zoning of the subject lands would not interfere with the zoning of other areas in the town as they would be associated with higher densities that proposed at this location.

Policy Context

- The author notes that the Residential Density Guidelines state that the National Strategy as outlined in the document “Sustainable Development a strategy for Ireland (DoELG 1997)” sets out the Government policy of encouraging more sustainable urban development and the proportion of higher residential densities in appropriate locations in harmony with improved public transport systems and to maximize the potential of already well serviced lands with regard to sewerage facilities, water facilities and road infrastructure.

- Submission recognises that the National Planning Framework targets a significant proportion of future urban development on infill/brown field sites within the built footprint of existing urban areas and notes that this is applicable to all scales of settlement, from the largest cities to the smallest village. The NPF targets 40% of new residential development should be within and close to the existing “footprint” of built areas. It states that we must make better use of under-utilised land and buildings including infill which are already fully serviced and adjacent to public transport.
- The author notes that it is advised in National Planning Framework that Planning Authorities should take this into account in their Development Plans and give specific recognition to the importance of achieving higher residential densities in appropriate areas on sites in proximity to town centres where public services and public transport corridors exist in the interests of providing more sustainable residential development. Submission states that the subject lands fulfils all of the criteria set out in the NPF.

Infrastructure and Services

- The lands are fully serviced with a foul sewer pipeline. Mains water supply, ESB, Telecom, Broadband, public footpaths and public lighting are already located adjacent to the site. In addition the submission states that the area is safe for walkers, cyclists and all vehicle users due to the downgrading of the road following the construction of the N2.

Existing and Planned Housing Stock

- Submission acknowledges the population growths estimated within the development plan and states that although social housing has been provided for within the town, there is a need for self build developments.
- Submission includes correspondence from a number of Auctioneers confirming the market for such types of development.
- Submission quotes Section 6.3 of the Sustainable Residential Development in Urban Areas Guidelines 2009 which states that offering alternatives to urban generated housing in some limited circumstances, notably where pressure for development of single homes in rural areas is high, proposals for lower densities of development may be considered acceptable at locations on serviced land within the environs of the town or village in order to offer people, who would otherwise seek to develop a house in an un-serviced rural area, the option to develop in a small town or village where services are available and within walking and cycling distance.
- Submission also quotes Section 6.12 of the aforementioned guidelines which states order to offer an effective alternative to the provision of single houses in surrounding un-serviced rural areas, it is appropriate in controlled circumstances to consider proposals for developments with densities of less than 15 - 20 dwellings per hectare along or inside the edge of smaller towns and villages, as long as such lower density development does not represent more than about 20% of the total new planned housing stock of the small town or village in question. This is to ensure that planned new development in small towns and villages offer a range of housing types, avoiding the trend towards predominantly low-density commuter-driven developments around many small towns and villages within the commuter belts of the principal cities and other Gateway locations. Such lower density development also needs to ensure the definition of a strong urban edge that defines a clear distinction between urban and the open countryside.
- Submission also quotes the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities and notes the following:
 - Section 3.3 states “deliver brownfield and infill development at scale at suitable strategic and sustainable development locations within the existing built-up footprint of the city and suburbs area or metropolitan towns”

- Section 3.3.3 Key Towns and Large Towns (5,000+ population) states “realise opportunities for adaptation and reuse of existing buildings and for incremental back land, brownfield and infill development”
- Section 3.3.4 Small and Medium Sized Towns (1,500 – 5,000 population) states “The recommended approach for small to medium sized towns will be to plan for growth arising from economic drivers within and around the settlement and to offer an improved housing choice as an alternative, including serviced sites, to housing in the countryside. Given the range of settlement types in this tier, planning authorities will, as part of the statutory plan making process, need to refine the density standards set out in Table 3.6 to respond to local circumstances. This section also seeks to ‘realise opportunities for adaption, reuse and intensification of existing buildings and for back land, brownfield and infill development’
- Section 3.3.6 Exceptions notes “In the case of very small infill sites that are not of sufficient scale to define their own character and density, the need to respond to the scale and form of surrounding development, to protect the amenities of surrounding properties and to protect biodiversity may take precedence over the densities set out in this Chapter”
- The author contents that policy guidelines clearly favour infill development as proposed with this rezoning request.

Conclusion

- The submission requests the inclusion of lands within the settlement of Castleblayney and zoned as Proposed Residential B for the following reasons:
 - The site is well located on the periphery of Castleblayney and is suitable as an infill residential site for four houses.
 - The site is serviced with existing foul sewerage pipe-line, mains water supply, ESB, Eircom, Broadband, public footpath and public lighting etc.
 - The Zoning of this plot as Proposed Residential ‘B’ will be compatible and sustainable in terms of the Monaghan County Development Plan in that there is existing residential community in this area at present and that this development will infill and consolidate this residential settlement area.
 - That there is a high back drop of land, mature trees and hedgerows creating a very visual and pleasing location for such development.
 - The site is within walking distance of the town centre and has the benefit of an existing public footpath which has public lighting.
 - The proposal will be in line with the policies set out in the (NPF) National Planning Framework, National Spatial Strategy, the Residential Density Guidelines and The Sustainable Residential Development in Urban Areas, Guidelines 2009 and the Sustainable and Compact Settlements Guidelines for Planning Authorities
 - There is a great demand for such self-build serviced sites at present with several genuine enquiries to purchase same.
 - That in order to offer an alternative to people who are thinking of building out in the rural area on un-serviced sites it is appropriate in controlled circumstances for proposed development along the edge of towns and villages as long as this development does not represent more than 20% of the total new town housing stock. The landowner’s proposal is nowhere near this 20% maximum target and therefore fulfils all of the criteria set down in these guidelines.

Chief Executive Response

The submission requests the inclusion of lands within the settlement envelope of Castleblayney and zoned as 'Proposed Residential B'.

It is noted that within the submission, the subject lands are referenced as being zoned as 'Strategic Residential Reserve', however this is incorrect. Within the Draft Plan, the subject lands are located outside the settlement envelope of Castleblayney and are therefore located within the rural area.

The submission refers to the National Planning Framework (NPF) and quotes the NPF target of providing 40% of new residential development within and close to the existing "footprint" of built areas. It should be noted that the 40% target is a national target as reflected within National Policy Objective 3a of the NFP whereas National Policy Objective 3c requires at least 30% of all new homes to be located in settlements other than the five Country Cities and their suburbs, within their existing built-up footprints. A key consideration in this regard includes development on infill and brownfield lands on lands within the built up envelop of existing settlements as well as compliance with the principles contained within the Town Centre First Policy. The submission references The Sustainable Residential Development in Urban Areas, Guidelines 2009 which were replaced by Sustainable Residential Development and Compact Settlements Guidelines in January 2024. These most recent guidelines set out policy and guidance in relation to the planning and development of urban and rural settlements and expand on the high-level strategy of the National Planning Framework as well as setting out detailed growth criteria to support the development of sustainable and compact settlements.

The Core Strategy of the County Development Plan recognises the role of settlements in driving the development of the County and identifies the scope of development possible for the County, while remaining consistent with National and Regional policy. It also identifies the quantum and location of development for the plan period, consistent with the population targets and settlement hierarchy that reflects the availability of existing services, planned investment, sequential development and environmental requirements.

Whilst it is acknowledged that the lands have services available to them, the subject lands are located on the periphery of Castleblayney, 1.5km from the town centre and outside the defined settlement envelope of the town. The inclusion of the lands within the settlement envelope of Castleblayney would not contribute to the compact growth of the town and would not constitute infill development within the existing built-up footprint of the settlement.

It is considered that the extent of 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. The inclusion of these lands would not support long term compact growth and/or follow a sequential approach to the zoning of land.

Having regard to the above, it is recommended that there is no change to the settlement envelope of Castleblayney.

Chief Executive Recommendation

No amendment recommended.

Core Strategy Summary – Castleblayney

As detailed in the Chief Executives response to the submission received from the Office of the Planning Regulator (Submission MN-C22-MCDP-126) the Core Strategy has been revised having regard to the amended Housing Supply Target Table. The residential zoned land requirement for Castleblayney has been adjusted to 15.35 ha as indicated in the revised Table 2.5, a reduction of 2.5 ha from the draft Plan.

Following consideration of the submissions received, a number of residential zoning changes have been recommended for Castleblayney in this report. To ensure alignment with the revised Core Strategy, further alterations to the residential zonings have been recommended as detailed in the table below. The left hand column of the table indicates the lands recommended to be zoned for residential use, while the column on the right recommends lands to be dezoned/rezoned from Proposed Residential A or B. Related maps identifying the changes are attached for reference.

The Chief Executive's report recommends the rezoning of the lands at Killycard (Submission No 102) from 'Strategic Residential Reserve' to 'Proposed Residential B'.

It is recommended that lands at Conabury (portion of Submission No 7) be rezoned from 'Proposed Residential B' to 'Landscape Protection/Conservation'.

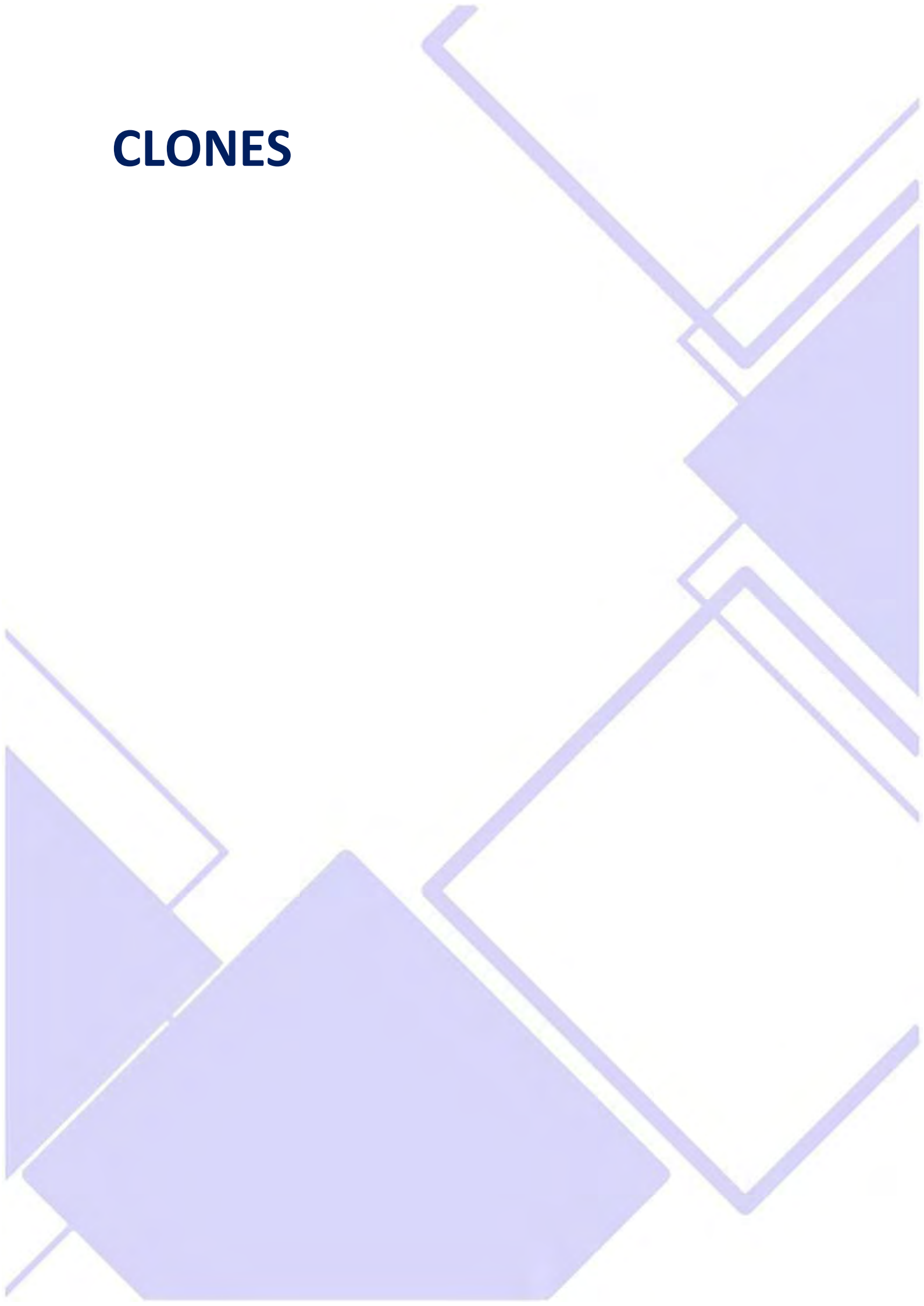
It is recommended that lands at Conabury (Submission No 68) be rezoned from 'Proposed Residential B' to 'Strategic Residential Reserve'.

It is recommended that a portion of lands at Bree (identified on attached Amendment Map-Site No.5, Bree), be rezoned from 'Proposed Residential A' to 'Landscape Protection/Conservation'.

It is recommended that lands at Moraghy (identified on attached Amendment Map-Site No.6, Moraghy), be dezoned and the settlement envelope adjusted, due primarily to their peripheral location.

Submission No.	Area of proposed additional Residential A & B Zonings	Submission No./ Site No.	Area of proposed Residential A & B Zonings be rezoned/dezoned
102 (Killycard)	1.039 ha	7 (Conabury)	0.324 ha
		68 (Conabury)	1.185 ha
		Site 5 (Bree)	0.2149 ha
		Site 6 (Moraghy)	1.599 ha
Total area of lands proposed for addition	1.039 ha		
Reduction as per revised Core Strategy	2.5 ha		
Total	3.54	Total area of lands proposed for dezoning/rezoning	3.32 ha

CLONES



Submissions relating to Clones Town			
Submission Reference	Name/Organisation	Location of Subject Lands	Page No.
<u>MN-C22-MCDP-1</u>	Boyle Sports Limited c/o Genesis Planning Consultants	Lands at the former Paragon Bar, Fermanagh Street, Clones	436
<u>MN-C22-MCDP-11</u>	Peadar Mackle c/o Genesis Planning Consultants	Lands at Largy Townland, Monaghan Road, Clones	438
<u>MN-C22-MCDP-12</u>	Peadar Mackle c/o Genesis Planning Consultants	Lands at Annalore Street, Clones	441
<u>MN-C22-MCDP-66</u>	Seamie McMahon on behalf of Clones Town Team	98 Avenue & The Fair Green Annalore Street	444
<u>MN-C22-MCDP-69</u>	Fintan Hamill	Teehill, Clones	445
<u>MN-C22-MCDP-78</u>	John McQuaid	Mullanamoy	447
<u>MN-C22-MCDP-135</u>	Gerry Corrigan	Lands at Cloonkeen Cole, Clones Town	449

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-1</u>	Gensis Planning Consultants on behalf of Boyle Sports Limited	Lands at the former Paragon Bar, Fermanagh Street, Clones	N/A

Summary of Submission & Issues Raised

- Request that the Record of Protected Structures (RPS) for Clones Town be amended so that Reference to No. 30 'Public House' (Paragon) be removed from the RPS going forward.
- The request is on the basis that this former building has been removed from the lands and no longer exists, by virtue of its structural collapse in recent years.
- The Draft Policy Objective BHP2 provides a context for the review of the register of Protected Structures.

Chief Executive Response

The building referred to in the submission relates to Reference No. 30 on the Protected Structure Register which lists the structure as the 'Public House (Paragon)', Fermanagh Street, Clones. The building in question was 3 stories in height and formed part of a terrace of properties fronting onto Fermanagh Street in Clones.

The Planning and Development Act 2000 (as amended) (the Act) sets out at Section 2 that a "protected structure" means—

(a) a structure, or

(b) a specified part of a structure,

which is included in a record of protected structures, and, where that record so indicates, includes any specified feature which is within the attendant grounds of the structure, and which would not otherwise be included in this definition.

The Act goes on to state that, "protection", in relation to a structure or part of a structure, includes conservation, preservation and improvement compatible with maintaining the character and interest of the structure or part.

Section 58 of the Act sets out the duty of owners and occupiers to protect structures from endangerment and Part (4) of Section 58 clearly states, 'any person who, without lawful authority, causes damage to a protected structure or a proposed protected structure shall be guilty of an offence.'

The Draft Development Plan process allows for the addition or deletion of Protected Structures from the register. The structural collapse, removal and/or demolition of a Protected Structure does not warrant its deletion.

The submission also referred to Policy Objective BHP2 of the Draft Monaghan County Development Plan 2025-2031 which states as follows:

'To review, maintain and update the Record of Protected Structures in consultation with the National Inventory of Architectural Heritage and to encourage the sympathetic conservation, renewal and repair of these structures.'

The words specifically reference the 'sympathetic conservation, renewal and repair'. If the structure needed repair or was indeed structurally unsound, then it is the duty of the landowner or occupier as per Section 58 to ensure that it is not endangered.

It is recommended that the building listed at No 30 Fermanagh Street remain on the Register of Protected Structures.

Chief Executive Recommendation

No amendment recommended.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-11</u>	Peadar Mackle c/o Genesis Planning Consultants	Lands at Largy Townland, Monaghan Road, Clones	71

Summary of Submission & Issues Raised

The submission requests the following on zoned 'Industry, Enterprise Employment' lands in the Draft Development Plan:

- That the proposed zoning is amended to 'Opportunity Site 1' (i.e. Land Use Matrix is altered for designated sites only)
- That the use classes associated with the Zoning Matrix be amended to provide for Retail to be 'Open for Consideration' on these lands

Introduction

- Genesis Planning have undertaken an analysis of the clients lands in context of the National Planning Framework, the County Development Plan, the Regional Spatial and Economic Strategy for the Region (RSES) and the Retail Planning Guidelines

Subject Lands in Context

- Zoned 'Industry/Enterprise/Employment' in current MCDP 2019-2025
- Retail Warehousing is 'Open for Consideration' in the current zoning and land use matrix
- Policy Objective RTP 5 is noted *'The preferred location for large scale retail developments is in town centres, with an explicit presumption against large out of town retail centres, in those located adjacent or close to existing, new or planned national roads. Alternative locations will only be considered in accordance with the Sequential Test, as required under the Retail Planning Guidelines for Planning Authorities 2012'*

Land Use Matrix and Draft MCDP 2025-2031

- Landowner intends to redevelop the entire landholding with a Discount Foodstore of c2500sqm
- No suitable or available sites to facilitate a Discount Foodstore in Clones Town Centre
- Retail Convenience or Comparison is 'Not Permissible' on site zoned 'Industry, Enterprise, Employment'
- Zoning Matrix for subject lands is not appropriate- it does not facilitate a 'Justification test' under the Retail Planning Guidelines to be applied to this 'Edge of Centre' location
- Draft Zoning Matrix is contrary to Section 4.6.2 of Draft MCDP 2025-2031
- Retail Objectives (RTO 1-13) and Retail Policy (RTP1) are outlined
- Request that Retail is 'Open for Consideration' in Land Use Zoning 'Industry, Enterprise, Employment'

Other Matters

- Donegal County Development Plan 2024-2030 has adopted an approach for opportunity sites to have a 'Key Site Objective' i.e. Land Use Matrix is altered for designated sites only, thereby avoiding undesirable 'broad' zonings applied to all lands

Retail Planning Guidelines

- Genesis Planning submits responses to 8 key policy objectives of the Retail Planning Guidelines to demonstrate that in certain instances 'Retail' complies with the Guidelines on zoned I/E/E lands thereby facilitating a Discount Foodstore

Summary and Conclusion

- That the proposed zoning is amended to 'Opportunity Site 1'
- That the use classes associated with the Zoning Matrix be amended to provide for Retail to be 'Open for Consideration' on these lands

Chief Executive Response

The submission requests the following on zoned 'Industry, Enterprise Employment' lands in the Draft Development Plan:

- That the proposed zoning is amended to 'Opportunity Site 1' (i.e. Land Use Matrix is altered for designated sites only)
- That the use classes associated with the Zoning Matrix be amended to provide for Retail to be 'Open for Consideration' on these lands

The subject lands are located at Largy Townland, Monaghan Road, Clones, and are close to the Town Centre. The lands are within the settlement envelope, are Tier 1 'Serviced Zoned Land' and are zoned 'Industry, Enterprise and Employment' in the Draft Development Plan. Lands have access onto the N54 National Road/Monaghan Road and are located within the speed limit zone. The lands can connect to existing development services that have capacity and can therefore accommodate new development. The redevelopment of the entire landholding is supported in principle.

It is noted that the landowner states that they intend to develop a Discount Foodstore (2500sqm) on the subject lands and requests that the proposed zoning is amended to 'Opportunity Site 1' and that the use classes associated with the Zoning Matrix be amended to provide for Retail to be 'Open for Consideration' on these lands.

In this regard,

- The Development Plan Objective for 'Industry, Enterprise and Employment' lands is to provide for new industrial, enterprise and employment generating development and to facilitate expansion of existing industrial and employment generating enterprises
- Development will be determined having regard to the Land Use Zoning Matrix set out in Table 9.3 of Chapter 9 of the Monaghan County Development Plan 2025-2031. Uses other than the primary use for which an area is zoned may be permitted, in certain circumstances, provided they are not in conflict with the primary land use zoning objective.

As previously stated, the redevelopment of the entire landholding is supported in principle for new and expanding industrial and employment generating enterprises. Uses other than the primary use for which an area is zoned may be permitted, in certain circumstances, provided they are not in conflict with the primary land use zoning objective. Therefore, it is recommended that the use classes associated with the Zoning Matrix in Monaghan County Development Plan 2025-2031 be retained.

Retail Objective RTO 1 commits to preparing a new Retail for Strategy for County Monaghan, during the lifetime of the Development Plan. RTO 1 is an acknowledgement that the County Monaghan Retail Strategy 2016-2022 should be reviewed and updated as necessary to ensure that it provides an up-to-date overview of the town centres, the retail hierarchy and appropriately supports the vitality and viability of the County's towns. The revised retail strategy will be prepared taking account of the Town Centre First Policy and any town centre first plans which have been produced. How best to accommodate and support discount convenient retail as an alternative choice at appropriate locations will be a key consideration of the revised Retail Strategy.

The Retail Planning Guidelines identifies that the order of priority for new retail development is town centre followed secondly by edge-of-centre sites. The County Development Plan does not zone lands as 'edge of town centre'. Applications which come forward for retail development on an edge of town centre sites will only be acceptable where it is demonstrated to the satisfaction of the Planning Authority that there are no sites or potential sites within the town centre that are suitable, available and viable.

The overarching objective of the Monaghan County Development Plan, as set out in retail objectives, seek to locate retail development within town centres, the scale of which is commensurate with their role and function in the settlement hierarchy. It is considered that the town centres within the five main towns, with policies contained within the development, offer sufficient opportunity to accommodate retail development during the lifetime of the development plan.

On the basis of the above, it is recommended that the most appropriate use of these Tier 1 lands is as 'Industry, Enterprise and Employment'.

Chief Executive Recommendation

No amendment recommended.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-12</u>	Peadar Mackle c/o Genesis Planning Consultants	Lands at Annalore Street, Clones	72

Summary of Submission & Issues Raised

The submission requests the rezoning of land from part 'Proposed Residential B' and part 'Landscape Protection/Conservation' to all 'Residential A' (Folio MN19275F).

Introduction and Background- Purpose of Report

- Genesis Planning have undertaken an analysis of the clients lands in context of the National Planning Framework, the Regional Spatial and Economic Strategy for the Northern and Western Region (RSES) and the current MCDP 2019-2025
- Analysis confirms that the lands are well-suited for residential development, being sequentially appropriate location and should be zoned ahead of other parcels elsewhere in the Town

Subject Lands and Site Location

- Subject lands of c3.89Ha are located to the south-east of Clones town centre, along the southern boundary of Annalore Street, in the townlands of Legarhill
- Brownfield site with works already commenced under a previous planning permission (04/20011, 08/20006 and 10/20001)
- Access via existing entrance on Annalore Street
- Site slopes from south to north and is naturally enclosed by mature trees
- Lands are within Clones settlement boundary and are zoned partly Residential A, Residential B and Landscape Protection in current MCDP 2019-2025
- Draft MCDP 2025-2031 proposes to 'dezone' the lands entirely to Landscape Protection

Local Connections

- Lands are well connected to Clones town centre and public transport via Annalore Street

Planning History

- 04/20011, 08/20006 and 10/20001 for residential development
- Lands are to be regarded as 'Tier 1', serviced and appropriate for development

Concept design and delivery

- Design team currently progressing proposal for residential development

Sequential Development

- Sites further removed from the town centre are 'Proposed Residential' which does not align with the sequential planning principles and these lands do not have previous planning
- Outlined attributes make these lands strategically important in the overall sequential development of Clones and should be zoned as 'Proposed Residential A' as they are ready to be developed

Residential Zoning Analysis

- Lands beyond 0.75km have been zoned for residential development
- Clients lands within the 0.75km boundary are not proposed for residential zoning

- In sequential principles, the clients lands should be prioritised for 'Residential A' zoning to meet local housing demand and to ensure the efficient use of serviced lands within Clones

Policy Context

National Policy

- Extracts demonstrate how the proposal is consistent with National Policy Context
 - National Planning Framework 2040 (Objectives 3a, 3c, 4, 5, 6, 11 13, 18a, 18b and 35)
 - Draft NPF Review, July 2024 (Objective NSO 10)

Regional Policy

- Consistent with Objective RPO 177 and 178 of RSES

Local Policy

- Lands are within Clones settlement boundary and are zoned partly Residential A, Residential B and Landscape Protection in current MCDP 2019-2025
- Section 28 of the Development Plan Guidelines have a policy objective that sets out lands currently zoned should not be de-zoned

MCDP 2019-2025 and Core Strategy

- Clones is designated a Tier 3 Service Town
- Clones has completed only 51 housing units since 2019, an average of 9 units per year, falling significantly short of the 18 units per year requirement
- Constraints include covid, cost price inflation and housing scheme not being viable
- The figure of 11.4Ha. should be retained into the MCDP 2025-2031
- Draft MCDP allocates housing for 83 units, representing a reduction of 21 units compared to MCDP 2019-2025
- Core Strategy is based on CSO Statistics 2022 which is at odds with the ERSI and NPF Review of population growth across the State
- Outdated CSO data undermines Clones Town Housing Allocation
- Correct approach would be to (a) carry forward units that have not been delivered from MCDP 2019-2025 and (b) provide headroom in the Core Strategy for residential development

Infrastructure Assessment

- Subject lands are not identified or scored in error in appendix 16
- Infrastructure Assessment needs to be revised to ensure subject lands are scored 'Tier 1' and zoned 'Proposed Residential A' in advance of other parcels further removed from the town centre

Development Plan Guidelines for Planning Authorities 2022

- Section 28 require the sequential approach to the zoning of lands, particularly for lands that have capacity to deliver residential units
- Section 4.4.1 state that housing land that is serviced and zoned should not be subject to de-zoning
- The proposed de-zoning of these lands is inconsistent with the Section 4.4.1 of Development Plan Guidelines for Planning Authorities 2022
- Other lands which are significantly further removed from the town centre are proposed as residential in advance of the subject lands which is inconsistent with Section 6.2.3 of the aforementioned Guidelines

Other Matters- Previous MCDP 2019-2025 and requested zoning

- Submission to zone lands Residential A was not included

- Current submission notes
 - Development Plan Guidelines 2022
 - Compact Settlement Guidelines 2024
 - Lands adjoin existing residential areas
 - Lands are sequentially appropriate
 - No constraints on the lands to prohibit residential development
 - Previous permissions on the lands
 - A cordon sanitaire buffer zone can be adopted between the proposed residential development and the existing sewage works

Current and recommended Zoning

- That the Planning Authority designate the subject lands as 'Proposed Residential A'

Summary and Conclusion

- Lands are sequentially appropriate and suitable for residential development given the proximity to Clones Town Centre
- Under the tiered approach set out in the NPF, these lands are Tier 1 (serviced) and should therefore be scored under a revision of the Infrastructure Assessment
- Core Strategy is based on CSO Statistics 2022 which is at odds with the ERSI and NPF Review of population growth across the State
- Outdated CSO data undermines Clones Town Housing Allocation
- Correct approach would be to (a) carry forward units that have not been delivered from MCDP 2019-2025 and (b) provide headroom in the Core Strategy for residential development
- That the Planning Authority designate the subject lands as 'Proposed Residential A'

Chief Executive Response

The submission requests the rezoning of land from part 'Proposed Residential B' and part 'Landscape Protection/Conservation' to all 'Residential A' (Folio MN19275F).

The subject lands are located to the south-east of Clones Town Centre, along the southern boundary of Annalore Street. The lands are within the settlement envelope, are Tier 1 'Serviced Zoned Lands' and are zoned part Proposed Residential B and part Landscape Protection/Conservation in the Draft Development Plan. The lands are accessed via the Regional Road R183/ Ballybay Road and are within the speed limit zone. Part of the lands are elevated and provide a buffer between the residential area of Annalore Street/Ballybay Road and the Waste Water Treatment Plant to the south.

The Core Strategy of the Development Plan recognises the role of settlements in driving the development of the County and identifies the scope of development possible for the County, while remaining consistent with National and Regional policy. It also identifies the quantum and location of development for the plan period, consistent with the population targets and settlement hierarchy that reflects the availability of existing services, planned investment, sequential development and environmental requirements.

Whilst it is requested that the submission lands all be rezoned to Proposed Residential A, there are sufficient Proposed Residential A zoned lands in Clones Town to meet the projected population increase over the plan period.

Based on the above, it is recommended that the zoning of land as part 'Proposed Residential B' and part 'Landscape Protection/Conservation' be retained.

Chief Executive Recommendation

No amendment recommended.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No's.
<u>MN-C22-MCDP-66</u>	Clones Town Team	98 Avenue & The Fair Green Annalore Street	73 & 74

Summary of Submission & Issues Raised

The submission refers to two sites, referenced as Site 1 and Site 2.

Site 1 (Former halting site).

- The town team in conjunction with the Municipal District have plans to develop this area as Recreation / Amenity.
- A number of plans are being discussed, including a skateboard park.

Site 2 (Fair Green Annalore)

- The town team in conjunction with the Municipal District have plans to develop this area as Recreation / Amenity.
- A number of plans are being discussed, including community allotments.

Chief Executive Response

The Draft County Development Plan 2025-2031 had zoned Site 1 for 'Industry/ Enterprise/ Employment' and Site 2 for 'Strategic Residential Reserve'.

The submission highlights ongoing ambitions and plans which the Clones Town Team and the Municipal District of Clones and Ballybay have for the development of subject lands. This has been confirmed by the Clones and Ballybay Municipal District Office. The proposed land use zoning objectives of 'Recreation/ Amenity' are considered acceptable on the subject lands. It should be noted that any future development would be subject to relevant planning permission / consents and shall comply with all other relevant policy considerations of the Monaghan County Development Plan 2025-2031.

Chief Executive Recommendation

Recommended to change Site 1 and Site 2 zoning to 'Recreation/Amenity'.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-69</u>	Fintan Hamill	Lands at Teehill, Clones	75

Summary of Submission & Issues Raised

The submission requests the rezoning of lands from Landscape Protection/Conservation to Proposed Residential for the following reasons:

- The percentage of lands zoned for residential inside the curtilage of the Clones Town boundary had shrunk drastically over the previous development plans. Furthermore, a huge portion of the lands currently identified on the Clones Town Map CDP1 are steep and difficult to develop leaving them unattractive and expensive for developers to acquire with huge civil costs.
- Young professionals are struggling to get on the property ladder and many who have the benefit of a full planning permission in a rural setting are failing to meet the banks criteria for loan approval. A young couple who are earning circa €100k gross will get loan approval for four-times this combined amount. However, the SCSi rate for constructing a dwelling in the North East between €154/€181 per sq.ft. An average 2500sq.ft dwelling in rural Monaghan is now costing €450k to construct before considering kitchens or finishes. The market is there for young hardworking professionals to acquire quality homes in an Urban Settlement. Clones has a lot to offer and the applicant is committed to working with reputable developer (s) to design and construct a quality development on this site should the land be zoned for development.
- Site has direct access to the public road, is within the Clones Town boundary and within 90.0m from a sewer connection.
- Lands zoned for residential development are owned by Clogher Diocese or private individuals with no interest in development. A substantial portion of the zoned lands and the strategic reserve are steep and unsuitable for development.
- A preliminary inspection of subject lands has indicated that the site is not at risk of flooding and recent works to the nearby Marina will help mitigate any concerns even further. The site is approximately 90.0 meters from a manhole connection on the Clones Town System.
- Under the 2007 - 2013 plan, these lands were previously zoned for high density. This was subsequently removed in recent plans.
- If our application to have this land zoned then the target will be for a mix of social and affordable housing with small bungalows to facilitate older people who may wish to downsize and still have access to the town facilities such as Shops, Doctors, Pharmacists, Hairdressers, Church Services etc and without having to use a car so it will be more beneficial environmentally.
- Clones is no different than any other mid-size town in Ireland. There are a substantial number of families and individuals on the Monaghan County Council housing list and a development proposal for this site should be welcome news. There has been no developments of this nature in Clones in recent years and a tasteful development in this location would serve to alleviate housing stock shortage in this locality. The location and future development of this site will look over to the new marina and there is a footpath and public lighting from the site to the facility.
- We would respectively suggest that inclusion of these lands as Proposed Residential would enable the applicant to submit a planning application, partner with a suitable developer and deliver quality affordable homes for the residents of Clones. The site would constitute contingent development on the periphery of Clones Town with easy access to all services and amenities.

Chief Executive Response

The submission requests the rezoning of lands from Landscape Protection/Conservation to Proposed Residential.

The subject lands are located at Teehill, Clones, south of the Town Centre, within the settlement envelope, opposite a large commercial/industrial premises, ABP Meat processing plant. The lands are located close to the Ulster Canal. The lands have frontage onto the Regional Road R212 and is within the speed limit zone.

The subject lands are within the settlement envelope and zoned 'Landscape Protection/Conservation' in the Draft Plan with the objective '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'.

The Core Strategy of the Development Plan recognises the role of settlements in driving the development of the County and identifies the scope of development possible for the County, while remaining consistent with National and Regional policy. It identifies the quantum and location of development for the plan period, consistent with the population targets and settlement hierarchy that reflects the availability of existing services, planned investment, sequential development and environmental requirements.

The rezoning of the lands to residential would not contribute to the compact growth of the town and there are sufficient lands suitable for residential development in more sequentially appropriate locations to meet the projected population increase over the plan period.

Based on the above, it is considered appropriate to retain the lands as 'Landscape Protection/Conservation'.

Chief Executive Recommendation

No amendment recommended.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-78</u>	John McQuaid	Mullanamoy	76

Summary of Submission & Issues Raised

- Requests a correction to the extent of the conservation area for practical reasons.
- Requests an extension to the settlement envelope and a proposed zoning to allow for residential construction.
- Submission thanks Monaghan County Council and Heritage Officer for help in securing a home for the Wetland animals amongst which are Snipe currently under threat.

Submission is accompanied with a supporting document, that notes:

- Correction to conservation zone by removing area 'A' (as shown on map), to reflect field conditions. The stone access lane does not provide habitat for the wetland birds.
- Extension to settlement envelope would facilitate the construction of single dwelling and access.
- This single dwelling would have access to the mains water/sewer/ services on the Newtownbutler Road at two points (as marked on map).

Chief Executive Response

The submission requests a change of zoning at two parts:

- The removal of 'Area A' (as marked on the submission accompanying map), from 'Landscape Protection / Conservation designation', and
- The extension of the settlement envelope and the zoning of additional lands for residential purposes.

The submission does not suggest a proposed land use zoning, but requests would facilitate the "construction of single dwelling and access".

As the submission states that 'Area A', does not provide wetland habitat, it is considered appropriate to amend the boundary to reflect this and remove 'Area A' from Landscape Protection / Conservation designation.

The Settlement Hierarchy of the draft Development Plan identifies Clones as a Tier 4 Service Town. The Core Strategy identifies a target for additional houses within Clones during the lifetime of the Development Plan, which translates into a land requirement. It is considered that the quantum of lands zoned for residential purposes within the settlement envelope of Clones shall adequately accommodate projected housing growth during the lifetime of the Development Plan. The lands which have been zoned for residential use have been chosen taking account of the sequential approach to zoning land and compact development, and as such it is not considered necessary in the interests of sustainable development and compact settlement growth to include further peripheral lands within the settlement envelope of Clones.

Chief Executive Recommendation

It is recommended to exclude the area marked 'A' from the landscape/protection zoning and adjust the settlement envelope accordingly.

It is not recommended to extend the boundary to zone land for residential use.

Chief Executive Response

The submission requests the rezoning of lands from Landscape Protection/Conservation to Proposed Residential.

The subject lands are located at Teehill, Clones, south of the Town Centre, within the settlement envelope, opposite a large commercial/industrial premises, ABP Meat processing plant. The lands are located close to the Ulster Canal. The lands have frontage onto the Regional Road R212 and is within the speed limit zone.

The subject lands are within the settlement envelope and zoned 'Landscape Protection/Conservation' in the Draft Plan with the objective *'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'*.

The Core Strategy of the Development Plan recognises the role of settlements in driving the development of the County and identifies the scope of development possible for the County, while remaining consistent with National and Regional policy. It identifies the quantum and location of development for the plan period, consistent with the population targets and settlement hierarchy that reflects the availability of existing services, planned investment, sequential development and environmental requirements.

The rezoning of the lands to residential would not contribute to the compact growth of the town and there are sufficient lands suitable for residential development in more sequentially appropriate locations to meet the projected population increase over the plan period.

Based on the above, it is considered appropriate to retain the lands as 'Landscape Protection/Conservation'.

Chief Executive Recommendation

No amendment recommended.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-135</u>	Gerry Corrigan c/o I Plan I Design	Lands at Cloonkeen Cole, Clones Town	77

Summary of Submission & Issues Raised

The submission requests the rezoning of Parcels A, B and C (c1.07Ha.) to 'Proposed Residential A'.

- It is requested to rezone some parcels of land which are included in a larger plot (c1.97 Ha.), in the townland of Clonkeen Cole, just north of Clones town
- The site is well situated north of Clones with adequate road frontage, ample entrances and sightlines. It is served by ESB, public sewage and water mains connections. It rises in elevation from south to north, but not excessively
- Majority of the site (c1.07 Ha.) is currently zoned Existing Residential. A building on the site which was previously a retirement home for a Religious order, now serves as an IPAS centre
- It is requested to rezone Parcels A, B and C to 'Proposed Residential A'
 - Parcel A (0.29 Ha.) which is currently zoned as Strategic Reserve, the zoning status of which remains unchanged in the proposed county development plan
 - Parcel B (0.44 Ha.) currently zoned Industrial and Employment and who's zoning status also remains unchanged in the new CDP
 - Parcel C (0.175 Ha.) which is currently outside the envelope of the clones town boundary, but is part of the overall holding. Its current zoning status is Agricultural, as is its proposed status.
- This would create a cohesive site which could accommodate up to 34 detached 3-bed affordable residences, with ample parking, green amenity space, access and egress and parking.
- The rationale for this is that the availability of Social and affordable housing is at an all-time low
- The intention is to build out a scheme that will maximise the use of the site if its area and Zoning could be maximized.
- It is proposed to build out for an Approved Housing Body (AHB) or for lease back to County Council. This would take the financial and logistical responsibility away from the Local Authority.
- Alternatively, the site could be repurposed to cater for Age Sensitive or independent retirement housing, which much needed in the county
- It is proposed to build to the highest modern build standards, with each unit having an 'A' energy rating
- This will add to local community and help clean up the site as not fit of purpose for nursing home/ IPAS Centre.

Chief Executive Response

The submission requests the rezoning of Parcels A, B and C (c1.07Ha.) to 'Proposed Residential A'.

The subject lands of c1.97Ha. are located in the townland of Clonkeen Cole, to the north of Clones Town. The lands are located are immediately inside the limit of the Settlement Envelope (for the most part).

The majority of the site (c.1.07Ha.) is currently zoned Existing Residential. It is understood that an IPAS Centre currently operates in the former retirement home building on the site.

The Core Strategy of the Development Plan recognises the role of settlements in driving the development of the County and identifies the scope of development possible for the County, while remaining consistent with National and Regional policy. It also identifies the quantum and location of development for the plan period, consistent with the population targets and settlement hierarchy that reflects the availability of existing services, planned investment, sequential development and environmental requirements.

Parcel A

It is requested to rezone Parcel A (0.29 Ha.) from 'Strategic Residential Reserve' to 'Proposed Residential A'. This parcel is within the same curtilage of the former retirement home and on this basis, it is recommended that Parcel A is rezoned 'Existing Residential'.

Parcel B

It is requested to rezone Parcel B (0.44 Ha.) from 'Industry, Enterprise, Employment' to 'Proposed Residential A'. Clones has 39Ha. of land zoned 'Industry, Enterprise, Employment' determined on a number of factors including the uptake of current zoned land, planning and environmental considerations, such as topography, developable area, flooding, sequential test, accessibility and jobs ratio. These key considerations influence both the quantum of lands proposed to be zoned, and the locations of same, within the County Development Plan 2025-2031. It is important to continue to support the aim in further strengthening and developing the economic and employment base of Clones Town, therefore, it is considered appropriate to retain the existing 'Industry/Employment/Enterprise' zoning on the submission lands. No amendment recommended to Parcel B.

Parcel C

It is requested to include Parcel C (0.175 Ha.) within an expansion of Clones Settlement Envelope and zone it 'Proposed Residential A'. These subject Tier 2 lands are not currently sufficiently serviced to support new residential development, and the rezoning of the lands would therefore not contribute to the compact growth of the town. Additionally, there are sufficient lands located within the existing settlement footprint of Clones Town which are suitable for residential development in more sequentially appropriate locations to meet the projected population increase over the plan period. No amendment recommended.

Chief Executive Recommendations

- It is recommended that Parcel A is zoned as 'Existing Residential'.
- It is recommended that Parcel B is retained as 'Industry Enterprise Employment'.
- It is recommended that Parcel C is not included within the Settlement Envelope.

Core Strategy Summary – Clones

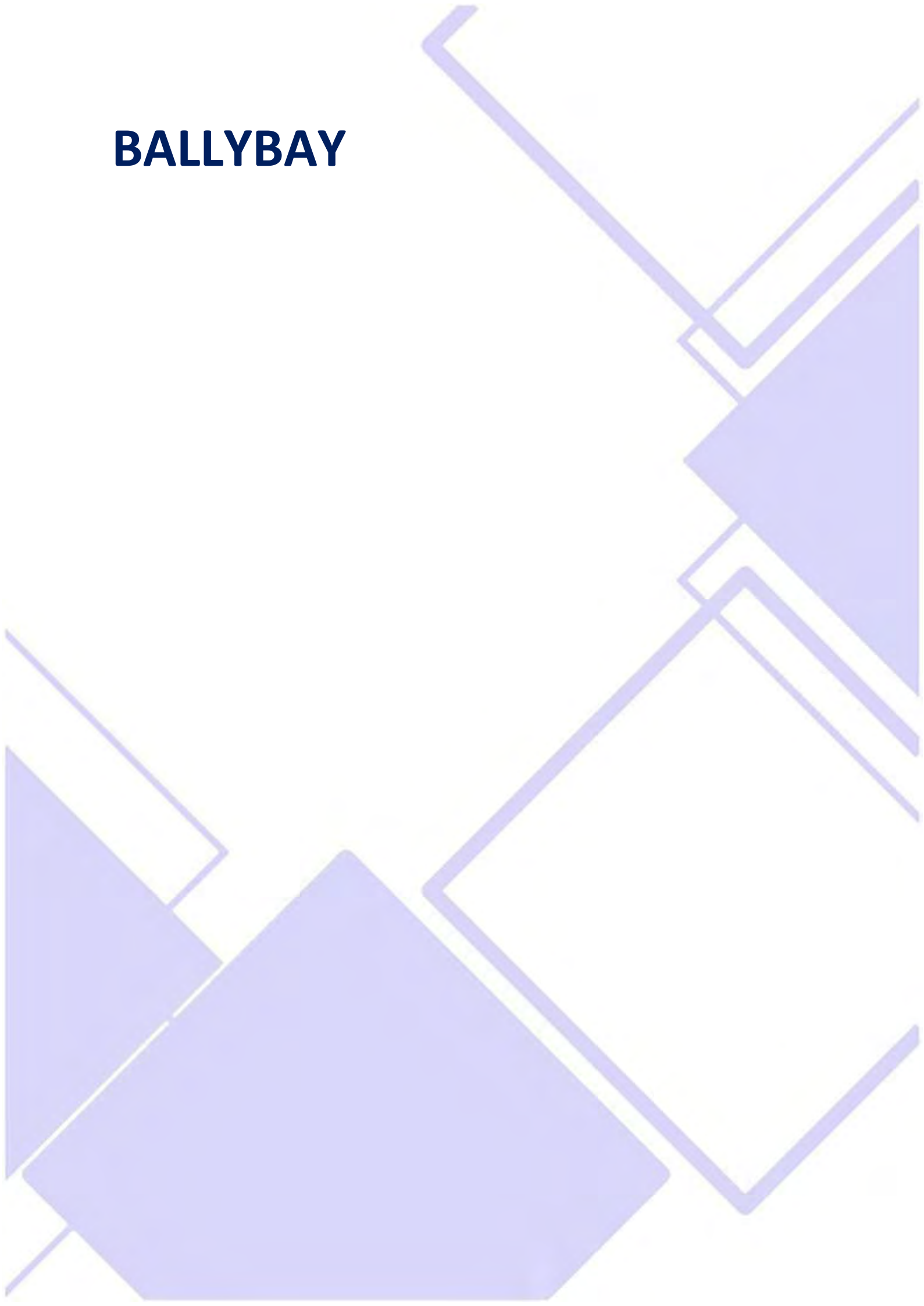
As detailed in the Chief Executives response to the submission received from the Office of the Planning Regulator (Submission MN-C22-MCDP-126) the Core Strategy has been revised having regard to the amended Housing Supply Target Table. The residential zoned land requirement for Clones has been adjusted to 7.67 ha as indicated in the revised Table 2.5, a reduction of 0.67 ha from the draft Plan.

To ensure alignment with the revised Core Strategy, alterations to the residential zonings have been recommended as detailed in the table below. The left hand column of the table indicates the lands recommended to be zoned for residential use, while the column on the right recommends lands to be rezoned/dezoned from Proposed Residential A or B. Related maps identifying the changes are attached for reference.

It is recommended that lands at Carn Lane (identified on attached Amendment Map-Site No.7, Carn Lane), and Legar Hill (identified on attached Amendment Map-Site No.8, Legar Hill) are dezoned and the settlement envelope amended, due primarily to their peripheral locations.

Submission No.	Area of lands proposed to be included	Submission No./ Site No.	Area of lands proposed to be removed
-	-	Site 7 (Carn Lane)	0.3062 ha
		Site 8 (Legar Hill)	0.4132 ha
Total area of lands proposed for addition	-		
Reduction as per revised Core strategy	0.67 ha		
Total	0.67 ha	Total area of lands proposed for dezoning	0.7194 ha

BALLYBAY



Submissions relating to Ballybay Town			
Submission Reference	Name/Organisation	Location of Subject Lands	Page No.
<u>MN-C22-MCDP-13</u>	Leonard Engineering c/o Genesis Planning Consultants	Cornamucklaglass & Knocknamaddy, Ballybay	453
<u>MN-C22-MCDP-14</u>	Leonard Engineering c/o Genesis Planning Consultants	Cornamucklaglass & Knocknamaddy, Ballybay	460
<u>MN-C22-MCDP-91</u>	Leonard Engineering c/o Genesis Planning Consultants	Knocknamaddy, Ballybay	467

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-13</u>	Leonard Engineering c/o Genesis Planning Consultants	Cornamucklaglass & Knocknamaddy, Ballybay	82

Summary of Submission & Issues Raised

- This submission relates to lands at the eastern environs of Ballybay Town.
- Submits that the subject lands will provide a suitable location for residential development. The subject lands measure 3.5 hectares in area and has road access to the R183 via the Ardveagh estate road that provides access to an existing residential development.
- Relevant Planning History: There is historic planning permissions associated with the subject lands, under Planning Reference 006/332 & 08/1315.

The overarching concept for the subject lands is to achieve:

- A scheme which creates a sense of place within the site and its surrounds.
- A scheme which adopts the principles of sustainable urbanism with a variety of house types.
- A high quality public realm, one which is enclosed by attractive buildings which actively front onto the road and internal aspects of the site providing pedestrian comfort and security.
- A scheme which responds to its locational context in terms of appropriate density and building scale, making the best and most efficient use of the land and the opportunities which it presents.

Policy Context

The submission provides an overview of national and regional policy context. This includes:

- National Planning Framework 2040 and relevant policy objectives contained within which seek to deliver housing.
- Draft NPF Review – 2024. Submission refers to the uplift in population growth set out in the NPF review and submits that this needs to be factored into the Draft County Development Plan 2025-2031 and the Core Strategy Housing provisions.
- Northern and Western Regional Assembly Regional and Spatial Economic Strategy (RSES). Submits that the proposed development is consistent with the policy objectives of the RSES, in particular its emphasis on the promotion of towns in rural areas.

In summary, the submission states that the subject lands are appropriate for residential zoning as envisaged by the National Planning Framework and the Regional Spatial Economic Strategy, as:

- Objectives 3a, 3c, 4, 5, 6, 7, 11, 13, 18a, 18b, 35 and NSO 10 of the NPF are complied with.
- The development would see significant delivery of a Tier 1 serviced site which is sequentially appropriate.
- Submit that the subject lands are appropriate for residential zoning and as a residential development as envisaged by the RSES given it is consistent with objectives RPO 177 and 178.
- The zoning of the subject lands will improve the supply of residential units for Ballybay in a sustainable manner, being located in a sequentially appropriate suburban location which is ideally suited for low-density residential development.

Local Policy Context – Monaghan CDP 2019-2025 Zoning

- The subject lands fall inside the current settlement boundary of Ballybay according to the current CDP for the period 2019-2025.
- The lands are currently zoned as ‘Proposed Residential A’ and ‘Proposed Residential B’.
- Section 28 Development Plan Guidelines have a policy objective that sets out lands currently zoned should not be de-zoned.

- Submission seeks to engage with the Planning Authority regarding the future planning and development of the subject lands and collaborate on the role the lands can play in the strategic growth of Ballybay and be included in the new zoning as 'Proposed Residential A'.

Monaghan 2019-2025 CDP & Core Strategy

- Ballybay has completed only 18 housing units since 2019, which equates to an average 3.5 units per year. This falls significantly short of the Core Strategy's target which sets an annual requirement of 16 units.
- Only 21% of the housing needed over the first three years of the County Development Plan has been delivered for the Town, highlighting a significant shortfall in meeting housing demand.
- This substantial failure necessitates the zoning of additional residential land in Ballybay, and the Draft County Development Plan has a role to address this under-provision of Housing Targets.

Draft Monaghan CDP and Core Strategy

- The Draft Development Plan identifies an uplift in population from the previous development plan, with an additional 181 persons envisaged over the plan period.
- The Draft CDP is proposing a housing allocation of only 53 units (a reduction of 41 from the 2019 CDP).
- Submits that despite the anticipated population growth and also factoring the under-delivery of Housing Units in the 2019-2025 CDP period, it is not good planning to reduce the Core Strategy Targets under the 2025 CDP.
- The shortfall from the last CDP, where only 18 units were constructed over 5 ½ years, is also highlighted and which has created significant pent-up demand for the local population.
- The Core Strategy 'Target' should not be viewed as a maximum but rather a minimum; therefore requiring headroom in zoned lands for Residential Development.
- The emerging ESRI and NPF review finding population growth across the State being higher than 2022 CSO data this needs factored into the Core Strategy.

Outdated Data Undermines Ballybay Housing Allocation

Submit that the reduction in Housing Allocation for Ballybay is not justified given:

- The CSO figures informing the CDP are outdated, based on the period between 2016-2022.
- The CSO figures presented in the 2024 NPF Revision and also ESRI publication "Population projections, the Flow of New Households and Structural Housing Demand" show a significant increase in population across the state that has not been captured into Housing Forecasts.
- The CSO (Population and Migration Estimates – August 2023 and 2024) estimates that the population of the State increased by c. 196,300 people (or 3.7%) between April 2022 and April 2024 which suggests that c. 78% of the draft revision NPF 250,000 population uplift for 2022-2040 has already been reached in the past 2 years.
- Ireland's population increased by 387,274, or 1.312% year-on-year, between Census 2016 and Census 2022 – if this growth rate were to continue, it would result in a total national population of c. 6.51 million people by 2040, equating to an increase of 1.36 million people on the 2022 census. This compares to an annual rate of 0.95% for the draft NPF revision.
- If the 2016-2022 growth rates were continued the population in 2040 would be c. 411,000 people higher than provided for in the draft NPF baseline projection.

Submission states that these population growth figures need factored into the Core Strategy and draft CDP going forward with an associated increase and headroom in the provision of zoned residential lands to meet market demand for scheme housing.

The uplift in population as per the draft CDP is restrictive and conservative, given the emerging census and demographic trends captured in both the NPF Review (2024) and ESRI publications.

ESRI Projections Highlight Population Growth above CSO Data & Forecasts

- Submission refers the Planning Authority to the ESRI publication, 'Population Projections, The Flow of New Households and Structural Housing Demand' (July 2024) and highlights key extracts, including, that at a regional level, while all regions are expected to experience population growth over the projection horizon, the Eastern and Midland region is expected to experience relatively higher growth, concentrated in the Dublin and Mid-East regions.
- Given Monaghan County is located proximate to the Eastern and Midlands Region, Ballybay should not be constrained into accommodating the growing population and flexibility needs incorporated into both zonings and policy objectives that will facilitate housing delivery in a manner that correlates with population growth and actual housing demand in the market.

Infrastructure Assessment under the Draft CDP

- On review of the Infrastructure Assessment (Appendix 16) submission notes that the entirety of the subject lands are identified as Tier 1 and fully serviced.
- Therefore the exclusion of the northern part of the site from the settlement boundary and not being proposed Residential A lands is contrary to the Infrastructure Assessment which classifies the entirety of parcels BB12 and BB13 as Tier 1.
- The lands being split into two different zonings (Proposed Residential A & Proposed Residential B) is not coherent with the identification of the entire lands as Tier 1.
- Submits that there is no basis to justify different zones within the subject lands.

Accordingly, in light of the Infrastructure Assessment, submit that both the zoning and settlement boundary needs revised to inform land zonings going forward in that:

- The subject lands are classified as Tier 1 entirely as scored accordingly in the Infrastructure Assessment.
- The subject lands should be zoned as Residential A in entirety.
- The settlement boundary needs revised so that the entirety of BB12 and BB13 is included in the settlement boundary.

Development Plan Guidelines for Planning Authorities 2022

- Submission highlights Section 28 Guidelines 'Development Plan Guidelines for Planning Authorities' (2022) which require a sequential approach to the zoning of lands, particularly for lands that have capacity to deliver residential units.
- Section 4.4.1 of the Guidelines states that housing land that is serviced and zoned should not be subject to de-zoning.
- The proposed de-zoning of the subject lands is inconsistent with the policy objectives outlined in Section 4.4.1 of the Development Plan Guidelines and National Policy.
- The guidelines clearly require maintaining zoned land that can contribute to meeting housing demand, especially during times of urgent housing need.
- Highlight that the Guidelines set out a requirement for Sequential Development of lands (section 6.2.3 of the Guidelines).
- The proposed zoning of the subject lands is not consistent with Section 6.2.3 or the policy objective of the Guidelines.
- Submit that these needs addressed going forward, both in relation to the Infrastructure Assessment and proposed zonings.

Delivery of Lands for Residential and local context.

Site Context

- The subject site has an overall area of approximately 3.3 hectares which includes existing road access.
- On review of site constraints (flood risk, topography), submission states that the entirety of the site is suitable for development in physical terms.
- The existing configuration and layout render the lands ideal for residential development with direct use of existing services.
- Residential land uses adjacent development on the subject lands is to be considered infill and sequentially appropriate.
- Several existing residential developments in Ballybay are located further from the town centre than subject lands.

Sequential Development

Submission refers to the merits of the sequential approach in land use planning, and highlights that the lands are appropriate in terms of sequential development given:

- The lands are directly accessible from the existing road infrastructure.
- The lands are serviced.
- The lands are available for development.
- The lands are sequentially the next parcel of lands available for development along the R183.
- The lands are sequentially appropriate in that it is closer to the town core than an existing residential development in the area.
- Lands immediately west, south and east are already developed for residential use.

Submit that these attributes make these lands strategically important in the overall sequential development of Ballybay and should be zoned as 'Proposed Residential A' as they are ready to be developed. Delivery of a scheme via an appropriate land use zoning on these lands should therefore be supported by the Planning Authority in advance of many other land parcels elsewhere in the town.

Settlement Boundary Analysis

- The northern portion of the subject lands have been excluded from Ballybay settlement boundary in the Draft Monaghan CDP, despite the entire site being zoned in the previous plan.
- The subject lands fall within the SAPMAP 2022 settlement boundary. The SAPMAP boundaries used by the CSO for the 2022 census, define the 'built-up area' of Ballybay.
- The Monaghan Draft CDP settlement boundary for Ballybay should align with the CSO SAPMAP boundaries, as these accurately represent the built-up area of the town.
- In the context of the CSO SAPMAP boundary, it is wholly appropriate that the subject lands be zoned as 'Proposed Residential A' as they represent the next logical and sequential extension of the built-up area.
- This would ensure that the zoning reflects the town's actual growth pattern for residential development within the settlement boundary.
- The Draft CDP proposal to de-zone a part of the subject lands is not appropriate and not in keeping with the findings of the Infrastructure Assessment.
- On review of the Draft CDP submission notes the settlement boundary at this quadrant of the town is not consistent with the CSO SAPMAP boundary, given it is proposed to reduce/amend the settlement boundary.

Recommended zoning

As part of the CDP 2025-2031, submission requests:

- The Planning Authority include the entirety of the subject lands within the settlement envelope of Ballybay Town in the 2025-2031 Monaghan County Development Plan.
- The Planning Authority designate the subject lands as outlined in this submission as suitable for zoning 'Proposed Residential A'.
- Submission emphasises that the entire site is classified as Tier 1, making it sound planning practice to adjust the zoning to 'Proposed Residential A' and to include all lands within the settlement boundary.
- On review of the local context, submits that the surrounding land uses in the immediate vicinity are compatible with a proposed residential scheme and residential development on the subject lands. Submission highlights:
 - The lands are adjacent to the established residential environs.
 - The subject lands are the next available parcel of lands on the local road R183.
 - The development of the lands for a residential development will be consistent with the residential profile of local environs.
 - The lands are sequentially appropriate for residential development given lands to the west, east and south of the site have already been developed for residential use.
 - The lands will provide a sustainable location for a residential scheme – achieving a balance in terms of residential units close to local services and centres of employment.
 - Zoning the subject lands as 'Proposed Residential A' would be consistent and appropriate in land use terms with the wider planning objectives to develop such serviced lands which are in proximity to the town centre and infill.
 - The lands have previously been included in the settlement limit and are currently within the limit of the 2022 CSO settlement map. The entirety of the lands should be returned to their previous status within the settlement boundary.

Summary & conclusion

- This submission requests that the Planning Authority designate the subject lands as outlined in the submission as suitable for zoning 'Proposed Residential A'.
- The subject lands have been deemed acceptable for residential use under the current Monaghan CDP 2019-2025. With there being no change in physical characteristics of the site there is no basis for the lands not to be zoned under the Draft CDP as published.
- In terms of the approach set out under the NPF for land zonings, the subject lands are appropriate for residential zoning as envisaged by the NPF given:
 - Under the tiered approach set out in the NPD these lands are Tier 1 (serviced) and should therefore be prioritised under the development plan process.
 - Objectives 3a, 3c, 4, 5, 6, 7, 11, 13, 35 and NSO 10 of the NPF are complied with.
 - The development would see significant regeneration of a sequentially appropriate and infill site along the R183 Road.
- Lands are appropriate for residential zoning as envisaged by the RSES given:
 - The lands are strategically positioned just inside the settlement boundary of Ballybay the zoning of the subject lands for residential development is consistent with the wider planning objectives set down by the NPF and RSES. The zoning of the subject lands will improve the supply of residential units for Ballybay in a sustainable manner.

The submission concludes with repeating several points which have been raised earlier in the submission, and for the purposes of summarising the submission in the Chief Executive Report, have not been repeated in summary of issues.

Concluding Statement

- The proposed de-zoning of the subject lands, in part, and reduction of the settlement boundary for the Town is inconsistent with the policy objectives outlined in Section 4.4.1 of the Development Plan Guidelines and National Policy. The guidelines require maintaining zoned land that can contribute to meeting housing demand, especially during times of urgent housing need.
- Trust that the Planning Authority will have regard to the contents of this submission in the preparation of the Monaghan County Development Plan 2025-2031 and the zoning request will be incorporated into the Draft Plan going forward.

Chief Executive Response

This submission relates to lands at Cornamucklaglass & Knocknamaddy, Ballybay, and includes two land use zoning requests, which are:

1. Extending the settlement boundary of Ballybay to include the entirety of the subject lands.
2. The entire subject lands are zoned 'Proposed Residential A'.

In regard to extending the settlement envelope of Ballybay, it is noted that the Settlement Hierarchy as set out in the Draft Development Plan 2025-2031, designates Ballybay as a Tier 3 settlement, Service Town. The Ballybay settlement envelope has been designated to manage development in a sustainable manner and restrict urban sprawl and the merging of distinctive areas in accordance with objective SSO 12.

The Core Strategy of the Development Plan recognises the role of settlements in driving the development of the County and identifies the scope of development possible for the County, while remaining consistent with National and Regional policy. It also identifies the quantum and location of development for the plan period, consistent with the population targets and settlement hierarchy that reflects the availability of existing services, planned investment, sequential development and environmental requirements.

The submission correctly acknowledges that the settlement envelope of Ballybay has been altered from the Monaghan County Development Plan 2019-2025, which results in the subject lands, in part, being outside of the settlement envelope. The draft settlement envelope of Ballybay is premised on sufficient lands located within the envelope which are suitable for residential development in more sequentially appropriate locations to meet the projected population increase over the plan period.

The submission emphasises that there have been low levels of housing completions within Ballybay since 2019. As such it is evident that there has been a low uptake of the lands zoned for residential purposes within Ballybay under the 2019-2025 Development Plan. It should be noted that Section 10(B) of the Planning and Development Act 2000 (as amended) makes it clear that there is no presumption in law that land zoned for any purpose in a development plan shall remain so zoned in any subsequent development plan.

Rezoning of subject lands

It should be noted that all the subject lands that are within the settlement envelope, are zoned for residential purposes. The lands which adjoin the public road are zoned 'Proposed Residential A', with 'Proposed Residential B'. Core Strategy Section 2.10 Sustainable Residential Densities, outlines the Planning Authorities approach to determining appropriate residential densities. It is considered that there are sufficient lands located within the existing settlement footprint which are suitable for residential development to meet the projected population increase over the plan period

Considering the lands zoned elsewhere within the settlement envelope, it is not considered necessary to zone the entirety of the subject lands for high density residential.

Other Considerations

The submission includes commentary on other matters:

- **Policy Context**

The policy context referenced within this submission, which includes the National Planning Framework 2040, the Draft NPF Review 2024 and also the Northern and Western Regional Assembly Regional Spatial and Economic Strategy is noted. The Draft Monaghan County Development Plan 2025-2031 has been prepared in accordance with National and Regional Policy, Aims and Objectives.

As acknowledged by the Office of the Planning Regulator in their response, the County Development Plan is being prepared at a crucial time during the process to update the National Planning Framework. The Draft First Revision to the National Planning Framework (July 2024) was published at a very late stage of the development plan process and remains in draft format.

- **Monaghan County Development Plan 2019-2025 & Core Strategy**

The comments made in respect of reviewing the Monaghan County Development Plan 2019-2025 and its Core Strategy are noted. This section raised concerns around the date used to inform the core strategy being outdated, and refers to the Draft First Revision to the NPF and the ESRI publication, "Population projections, The Flow of New Households and Structural Housing Demand".

- **Infrastructure Assessment (Appendix 16)**

The comments made in respect of the Infrastructure Assessment (Appendix 16) are noted. In accordance with NPF requirements National Policy Objective 72a, the Planning Authority carried out an Infrastructural Assessment of the existing zoned lands within Ballybay as designated within the Monaghan County Development Plan 2019-2025, to identify which lands were Tier 1 (Serviced) and Tier 2 (Serviceable within the Lifetime of the Development Plan). Uisce Éireann site specific comments in consultation response are noted, "PRA Site is served by a 150mm sewer and upgrade may be required. Pump Station upgrades may also be required depending on the level of development".

- **Settlement Boundary Analysis**

The comments made regarding the settlement boundary and the CSO SAPMAP 2022, are noted. National Policy Objective 3a within the NPF aims to "*Deliver at least 40% of all new homes nationally within the built-up footprints existing settlements*". However, as considered earlier, the settlement envelope of Ballybay has been drawn with the aim to consolidate existing development and promote the regeneration of existing derelict and/or vacant sites, and also on the premise of a sufficient quantum of land being zoned within the meet the projected population and housing requirements over the lifetime of the development plan. With the aim of creating compact settlements, it is not considered appropriate to extend the settlement envelope of Ballybay to align with the CSO built up footprint boundary.

Chief Executive Recommendation

No amendment recommended.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-14</u>	Leonard Engineering c/o Genesis Planning Consultants	Knocknamaddy, Ballybay	83

Summary of Submission & Issues Raised

This submission relates to lands measuring 6.56ha in area, located at the eastern environs of Ballybay town. The site has road access to the R183 via an existing access road.

Submission proposes that the subject lands offer a suitable site for a new business park campus incorporating industrial development.

The submission makes a number of comments under the following headings.

Concept Design & delivery

The Planning rationale is to deliver a high-quality industrial and employment development that provides appropriate economic infrastructure to grow the employment base in the Town.

The overarching concept for the subject lands aims to achieve:

- A new purpose-designed business park.
- Light Industry positioned in the smaller units, with a land-use matrix appropriate to the context.
- The scheme being developed to cater for a range of uses including Leonard Engineering's future growth plans and smaller units that can be utilised by the agri-food sector.
- A scheme that adopts sustainable industrial principles.
- Landscape buffers to surrounding lands.
- Storage areas removed from the public road.
- Utilising the existing access road in-situ that can cater for traffic volumes and provide access onto a regional road.
- Over-arching aim is to create a self contained and high quality business park as an integral part of the wider local economy.

Context

- The National Planning Framework 2040 sets out the importance of development within existing urban areas and sets out strategic objectives which Planning Authorities are to have regard to.
- Submission highlights a number of objectives contained within the NPF which are relevant:
 - Objective 7: 'Reversing the stagnation or decline of many smaller urban centres, by identifying and establishing new roles and functions and enhancement of local infrastructure and amenities'; and 'Encouraging population growth in strong employment and service centres of all sizes, supported by employment growth'...'in more self-contained settlements of all sizes, supporting a continuation of balanced population and employment growth'.
 - Objective 11: 'There will be a presumption in favour of development that encourages more people, jobs and activity within existing urban areas, subject to development meeting appropriate planning standards and achieving targeted growth'.
 - Objective 21: 'Enhance the competitiveness of rural areas by supporting innovation in rural economic development and enterprise through the diversification of the rural economy into new sectors and services, including ICT based industries and those addressing climate change and sustainability'.
 - Objective 23: 'Facilitate the development of the rural economy through supporting a sustainable and economically efficient agricultural and food sector, together with forestry, fishing and

aquaculture, energy and extractive industries, the bio-economy and diversification into alternative on-farm and off-farm activities, while at the same time noting the importance of maintaining and protecting the natural landscape and built heritage which are vital to rural tourism’.

- The NPF continues to support the proposed development as part of its national strategic outcomes in that outcomes 3 and 5 specifically state:
 - Outcome 3: Strengthened Rural Economies and Communities – ‘Continued Investment in the agri-food sector will underpin sustainable growth as set out in Food Wise 2025’, encouraging ongoing investment in the agri-food sector to underpin the sustainable growth of the sector.
 - Outcome 5 – A Strong Economy Supported by Enterprise, Innovation and Skills – A competitive innovative and resilient regional enterprise base is essential to provide the jobs and employment opportunities for people to live and prosper in the regions.

Submission states, in response, the proposed industrial/employment development aligns with the National Planning Framework 2040 by promoting growth within existing urban areas, supporting regional economic objectives, and addressing key goals such as revitalising smaller urban centres, fostering population and employment growth, encouraging sustainable land use, and advancing the circular economy. Additionally, it meets strategic outcomes 3 and 5 by contributing to a strong, competitive, regional economy supported by innovation and enterprise.

Realising Our Rural Potential: Action Plan for Rural Development

- The submission provides an overview of the main themes and objectives of the action plan.
- With regards to the proposed development the most notable of these objectives is contained within Pillar 2 – Supporting Enterprise and Employment where a key objective is to: ‘Support sectoral growth through the continued development of the agri-food sector through the implementation of Food Wise 2025 and roll out initiatives to development the renewable energy sector and International Financial Services in rural Ireland’.
- Submission refers to a number of objectives contained within the action plan, specifically 105, 106, 107, 108, 109 and 110.

Regional Spatial Economic Strategy

- The RSES sets out the spatial growth strategy for the border region and sets out a broad range of policies to encourage sustainable and economic growth of the area.
- The submission references key future priorities set out in the RSES, including Section 4.1, Section 4.5.3, RPO 3.4, RPO 3.13 and RPO 4.25.
- In response to the strategic objectives for the region we submit it is clear the RSES seeks to encourage innovation, commercialisation and the growth of small towns such as Ballybay.
- In this policy context the proposal incorporating the expansion of Industrial Lands in Ballybay to cater for both Leonard Engineering and creation of a new Business Park will also assist in growth of the Industrial and agri-food sector in the Town.
- Submits that the proposal is consistent with the objectives within the RSES.

Local Policy Context – Monaghan CDP 2019-2025 zoning

- Submission acknowledges that under the Monaghan County Development Plan 2019-2025, Ballybay is classified as Tier 3 Settlement – Service Town. The subject lands are outside of the settlement boundary of Ballybay as designated in same Plan.
- Submission refers to the recent and ongoing development of Leonard Engineering lands, comprising of 7 hectares at their existing premises being developed currently.

- With the 2025 Draft CDP covering the period until 2031 there is also a need for future growth scenarios to be provided for in land-use zonings.

Draft Monaghan 2025-2031 CDP

- Reference made to designation of Ballybay as a Tier 3 – Service Town.
- Policies BBSO 1, BBO 4, BBO 5 and BBO 8 highlighted as key policies to the development of Ballybay and in relation to the proposed zoning.

Zoning Shortfall and Need for Additional Industrial Land

- Submission notes that approximately 26 hectares have been proposed as Industrial, Enterprise, and Employment lands in Ballybay. While the plan asserts that this allocation is sufficient for the anticipated industrial development within the plan’s timeframe, highlight a critical oversight appears to have occurred.
- 7 hectares of the zoned land have already been granted permission for development under ref: 21/587 with development of this land-holding ongoing. This portion is already committed to a specific project, effectively reducing the available land for future industrial development to just 19 hectares.
- 19 hectares will not be adequate to meet the potential growth demands in Ballybay over the life of the Plan.
- Ballybay is strategically positioned to support both local and regional economic activity, and as the population and business needs increase, so too will the demand for industrial sites.
- The subject lands remain outside of the current zoning allocation and present a prime opportunity for future industrial expansion, as it would allow Ballybay to maintain the capacity for new industrial ventures, ensuring that the town continues to support economic growth in line with the strategic objectives of the Plan.
- Analysis of Appendix 17 of the Draft CDP has found that Ballybay already has the lowest share of zoned land in the County, accounting for just 5.5% of the County’s total. Given the rural hinterland the Town serves this is a strategic location for an increased quantum of industrial lands, as opposed to an under-supply and small businesses having to locate in rural areas.

On review of the draft CDP, submission wishes to highlight:

- Limited Remaining Capacity: Ballybay has a disproportionately low share of zoned industrial land compared to other settlements in the County, yet it has developed a significant portion of this land. The inclusion of the already-developed 7 hectares further exacerbates the scarcity of zoned land.
- Need for Additional Industrial Zonings: With a significant portion of Ballybay’s industrial land already developed or allocated to existing projects, there is a clear need to zone additional lands to ensure sufficient capacity for future industrial development and to attract new businesses and employment opportunities to the area.
- Going forward between 2025-2031 to maintain sufficient industrial land reserves and support the Town’s growth, submission states that it is essential that subject lands be included in the industrial zonings.
- This will safeguard Ballybay’s ability to respond to future economic opportunities and ensure that the town can continue to thrive as a key service and employment centre for its hinterland.

Population growth and Housing Demand: Implications for Zoning and Economic Development

- Submission refers the Planning Authority to the ESRI publication, ‘Population Projections, The Flow of New Households and Structural Housing Demand’ (July 2024).
- Submission highlights what they consider to be key extracts of the document.
- In the context of the document, the submission contends that with a growing population and increased economic activity for businesses to meet in terms of market demand, flexibility

should be integrated into both zoning designations and policy objectives to support economic growth and job creation in alignment with population increases and the rising demand for employment opportunities.

OPR Practice Note 04 – Planning for Employment Growth – The Development Plan

- The submission refers to the OPR Practice Note, outlining key aspects of the documents. The submission refers the Planning Authority to section 5.3 of the practice note which sets out an Enterprise and Employment Land Assessments. Submission notes that the OPR practice note also sets out the need for the Planning Authority to evaluate both greenfield and brownfield sites in terms of their suitability for future employment uses, considering factors such as accessibility, infrastructure and environmental constraints.
- This appraisal as per the OPR Practice Note has not been carried out, notwithstanding the objectives which seek to support Economic Growth of the County. In accordance with both the OPR Practice Note and the Planning Bill, submit that an Enterprise and Employment Land Assessment is required for Ballybay as part of the Draft CDP.
- Submission contends that this assessment will inform the need for these lands to be zoned as requested, given the 7-hectare land-holding that Leonard Engineering are currently developing is not available for future growth/land requirements in the lifetime of the plan.

3.0 Delivery of lands for Industry and local context

Site Context

- The subject lands are located at the eastern environs of the Town.
- The land is predominantly within 1km of the town centre and having regard to the constraints elsewhere affecting Ballybay (ie. flood risk and the Lough) the site is to be considered appropriate as there are no constraints affecting the lands.
- In accordance with the national planning policy and principles of sustainable development, priority should be given to the lands that are closer to the town core, maximising accessibility, infrastructure efficiency and the potential for compact growth.
- Site fully complies with the OPR Practice Note ‘Planning for Employment Growth’, Step 2, in terms of site suitability.

Sequential Development

- The merits of the sequential approach in land use planning, particularly for employment and industrial uses, are well established and it is also appropriate for greenfield parcels such as these lands to be incorporated into zonings.
- The suitability of land for industrial development depends on factors such as proximity to the town centre, accessibility, infrastructure, and services.

Submission highlights that the subject lands are sequentially appropriate for industrial development due to the following:

- They are the next sequential parcel of lands, allowing for residential on lands to the west
- They are directly accessible from existing road infrastructure, ensuring ease of movement.
- The subject lands are available and ready for development.
- Means of access onto the Regional Road.
- No physical constraints affecting the lands.
- These attributes make the site strategically important for the sequential development of Ballybay’s industrial sector and future growth.

4.0 Recommended Zoning

4.1 Current zoning (as per draft Monaghan CDP 2025-2031)

- Under the Draft CDP the lands are currently outside the settlement boundary.
- Submission highlights that the entirety of the lands should be included within the settlement boundary and zoned as 'Industry/Enterprise/Employment' as the next available parcel of lands ready for development.

4.2 Recommended zoning

Submission requests that the Planning Authority,

- Include the entirety of the subject lands within the settlement envelope of Ballybay Town in the 2025-2031 Monaghan County Development Plan.
- Designate the subject lands as suitable for zoning 'Industry/Enterprise/Employment' with a key site requirement to provide for serviced sites going forward.

4.3 Zoning Context

Submission contends that the surrounding land uses are compatible with the requested zoning and highlight the following:

- Leonard Engineering's existing lands are being developed pursuant to Planning Ref 21/587. This quantum of land (7ha) has to be provided for elsewhere in the town for the lifetime of the next CDP.
- Lands are readily accessible, Tier 1, given connections can be made to services.
- Subject lands are next available parcel for development along the R183, directly accessible from the existing road network, providing strong connectivity for industrial use.
- Developing these lands for industrial purposes would align with the industrial and employment profile of the surrounding area, supporting the towns economic growth.
- The location of these lands will support sustainable employment growth proximate to the town aligning with the demand for jobs close to population centres and transport links.
- Submit that zoning these lands for 'Industry/Enterprise// Employment' is consistent with the wider planning objectives of accommodating industrial growth and ensuring compact development.

5.0 Concluding Statement

5.1 Summary & Conclusion

The submission makes a number of concluding comments, the majority of which are repetition of comments made earlier in the submission. For the purposes of providing a summary of issues raised, they have not been repeated in this section.

In summary this submission requests that the Planning Authority:

- Include the subject lands in their entirety within the settlement envelope of Ballybay Town in the 2025- 2031 Monaghan County Development Plan.
- Designate the subject lands as outlined in this submission as suitable for zoning 'Industry/ Enterprise/ Employment'.

The submission states:

- the subject lands are appropriate for industrial zoning as envisaged by the RSES and the Draft CDP which seeks to encourage innovation, commercialisation and the growth of small towns such as Ballybay.
- In this policy context the proposal incorporating the expansion of Industrial Lands in Ballybay to cater for both Leonard Engineering and creation of a new Business Park will also assist in growth of the Industrial and agri-food sector in the Town.

- It is noted that lands proposed for industrial use in Ballybay are located adjacent to established residential areas. This can create a conflict of land use as industrial activities often involve noise, traffic and environmental impacts that can disrupt nearby residential communities, reducing quality of life for residents and potentially leading to future complaints or restrictions on industrial operations.
- In location terms it is good practice to position industrial lands at locations which have appropriate buffers from Residential and Town Centre land uses. The lands in this submission are ideally located as they are services and readily accessible from a Regional Road to cater for traffic.
- Ballybay has experienced relatively low levels of population growth in the last 10-15 years. To reverse this trend creation of a new business park as per request will act as a catalyst for regeneration of the town.
- Given the sequentially and physically appropriate nature of the site, submission contends that the lands are entirely appropriate for development going forward. This is supported by policy objectives at both the national and regional levels.
- Welcome the opportunities to participate in all stages of the plan making process and request that this submission be given full consideration by the Executive and Elected Members in preparation of the forthcoming CDP in accordance with Part II Section 11 of the Planning and Development Acts.

Chief Executive Consideration

The submission includes the following land use zoning request, which shall now be considered:

- Include the entirety of the subject lands within the settlement envelope of Ballybay Town; and
- Designate the subject lands as 'Industry/Enterprise/Employment' with a key site requirement to provide for serviced sites going forward.

The comments made in support of this request, within the submission, are noted. The subject lands lie outside of the settlement envelope of Ballybay, as per the Draft Monaghan County Development Plan 2025-2031. It should also be noted that they are also outside of the settlement envelope as defined by the current County Development Plan 2019-2025.

The Settlement Hierarchy contained within the draft Development Plan, designates Ballybay as a Tier 3 - Service Town. A settlement envelope has been drawn around the town in order to manage development in a sustainable manner and restrict urban sprawl and the merging of distinctive areas (Strategic Objectives for the Towns and Villages SSO 12).

The Core Strategy of the County Development Plan recognises the role of settlements in driving the development of the County and identifies the scope of development possible for the County, while remaining consistent with National and Regional policy. Section 2.5 of the Core Strategy includes an Economic Development Strategy, which identifies that the Core Strategy must also consider the economic function of the designated settlement to ensure the focus of growth is commensurate to the size and function of the settlement. The Economic Development Strategy goes on to acknowledge that the town of Ballybay "will be encouraged to create new local employment and opportunities".

Within the settlement envelope of Ballybay land is reserved for a variety of uses, including for 'Industry, Enterprise and Employment' (IE). As discussed further below, it is considered that a sufficient quantum of lands has been zoned within the settlement envelope to support the growth of employment related uses within Ballybay during the lifetime of the development plan.

Quantum of Industry, Enterprise and Employment Land Zoned

Comments made regarding the quantum of land zoned for IE use, within Ballybay, are noted. The assertion made that there is a zoning shortfall and a need for additional industrial land within Ballybay, however, is not agreed with.

Appendix 17 of the Draft Development Plan, Review of Industry, Enterprise and Employment Lands, acknowledges that Ballybay has developed a modest proportion of existing zoned land, and also references extant planning permissions which is referred to within this submission.

The Development Plan Guidelines (July, 2022), requires Planning Authorities, when zoning additional lands, to have a clear rationale for doing so, based on projected population, economic and employment growth and change over the lifetime of the development plan' (Section 6.2.25). The quantum of lands zoned in Ballybay are based on consideration of the town's population, commuter flows of workers, projected population growth during the lifetime of the development plan and the projected growth in working population. Whilst it is acknowledged that a portion of lands do have the benefit of extant planning permission, the remaining uncommitted zoned lands, i.e. those with no extant planning approval, are considered sufficient to cater for any future employment related growth during the lifetime of the Development Plan.

The approach to zoning for employment related uses requires a long-term strategic approach. In addition to adequate quantum of lands being zoned for such uses, the policies contained within the written statement of the Draft Development Plan are considered flexible to cater for any development which may come forward during the lifetime of the Development Plan. This includes Objective IEO 7 *"To consider proposals for industrial and commercial development on sites located in close proximity to the edge of towns, where it has been demonstrated to the satisfaction of the Planning Authority that the proposed development cannot be accommodated within the town development envelope due to lack of available suitably zoned lands, or on the grounds of amenity or environmental considerations"*.

OPR Practice Note 04 – Planning for Employment Growth – The Development Plan

Comments made in relation to OPR Practice Note 4, and submission request for the Planning Authority to complete an Enterprise and Employment Land Assessment, are noted. The Practice Note was published at a late stage of the draft development plan process, days prior to public consultation being launched. However, the draft Plan has addressed a number of points raised within the practice note, such as gathering existing data on enterprise and employment lands, assessing site suitability, and forecasting workforce supply.

Chief Executive Recommendation

No amendment recommended.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-91</u>	Leonard Engineering c/o Genesis Planning Consultants	Knocknamaddy, Ballybay	84

Summary of Submission & Issues Raised

- The draft Monaghan County Development Plan 2025-2031 designates the subject lands as outside the settlement boundary and have not been proposed for zoning.
- Submits that the proposed designation and no zoning for the subject lands is not appropriate, given the lands are within the CSO SAP Map for Ballybay Town.

Submission requests, that as part of the County Development Plan 2025-2031:

- The subject lands are zoned 'Proposed Residential A' and also the settlement boundary extended to correlate with the CSO SAP Map for Ballybay.
- Submits this zoning would allow for the completion of the existing residential development ensuring coherent development in line with the area's established town boundaries as per the CSO and also supporting the growth strategy for the town to deliver housing.

The submission includes a schematic layout which shows how the zoning request would allow for completion of the existing residential estate (figure 3 of submission).

Chief Executive Response

As the submission notes, the subject lands are outside of the settlement envelope of Ballybay, adjacent to an existing residential development to the east of the town. The Settlement Hierarchy within the draft Monaghan County Development Plan 2025-2031 designates Ballybay as a Tier 3 Service Town. The Core Strategy of the County Development Plan recognises the role of settlements in driving the development of the County and identifies the scope of development possible for the County, while remaining consistent with National and Regional policy. It also identifies the quantum and location of development for the plan period, consistent with the population targets and settlement hierarchy that reflects the availability of existing services, planned investment, sequential development and environmental requirements.

The subject lands are located on the periphery of Ballybay Town and the rezoning of the lands would therefore not contribute to the compact growth of the town. It is considered that there are sufficient lands located within the existing settlement envelope of Ballybay Town which are suitable for residential development in more sequentially appropriate locations to meet the projected population increase over the plan period.

The comments made regarding the settlement boundary and the CSO SAPMAP 2022, are noted. National Policy Objective 3a within the NPF aims to "*Deliver at least 40% of all new homes nationally within the built-up footprints existing settlements*". However, as considered earlier, the settlement envelope of Ballybay is drawn with the aim to consolidate existing development and promote the regeneration of existing derelict and/or vacant sites, and on the premise that a sufficient quantum of land has been zoned to meet the projected population and housing requirements over the lifetime of the development plan. With the aim of creating compact settlements, it is not considered necessary to extend the settlement envelope of Ballybay to align with the CSO built up footprint boundary.

Chief Executive Recommendation

No amendment recommended.

Core Strategy Summary – Ballybay

As detailed in the Chief Executives response to the submission received from the Office of the Planning Regulator (Submission MN-C22-MCDP-126) the Core Strategy has been revised having regard to the amended Housing Supply Target Table. The residential zoned land requirement for Ballybay has been adjusted to 6.4ha as indicated in the revised Table 2.5, a reduction of 1.6ha from the draft Plan.

To ensure alignment with the revised Core Strategy, alterations to the residential zonings have been recommended as detailed in the table below. The left hand column of the table indicates the lands recommended to be zoned for residential use, while the column on the right recommends lands to be rezoned from Proposed Residential A or B. Related maps identifying the changes are attached for reference.

It is recommended that the lands at Corkeeran (identified on attached Amendment Map-Site No.9, Corkeeran) be dezoned from ‘Proposed Residential B’, and the settlement envelope amended.

It is recommended that a portion of lands at Cornamucklaglass (identified on attached Amendment Map-Site No.10, Cornamucklaglass) be rezoned from ‘Proposed Residential A’ to ‘Landscape Protection/Conservation’.

It is recommended that lands at Corrybrannan (identified on attached Amendment Map-Site No.11, Corrybrannan) be rezoned from ‘Proposed Residential A’ to ‘Strategic Residential Reserve’.

Submission No.	Area of proposed additional Residential A & B Zonings	Submission No./ Site No.	Area of proposed Residential A & B Zonings be rezoned/dezoned
-	-	Site 9 (Corkeeran)	0.5899 ha
		Site 10 (Cornamucklaglass)	0.04844 ha
		Site 11 (Corrybrannan)	0.6288 ha
Total area of lands proposed for addition	-		
Reduction as per revised Core strategy	1.6ha		
Total	1.6ha	Total area of lands proposed for rezoning/dezoning	1.267 ha

PART 5

VILLAGE SUBMISSIONS



Submissions relating to Tier 4 Villages			
Submission Reference	Name/Organisation	Location of Subject Lands	Page No.
<u>MN-C22-MCDP-4</u>	Fintan McPhillips, on behalf of Seamus McQuaid	Scotshouse	470
<u>MN-C22-MCDP-9</u>	Brightsquare Properties Ltd	Smithborough	473
<u>MN-C22-MCDP-20</u>	Gwen Murphy Manager Doohamlet Community Centre	Doohamlet	475
<u>MN-C22-MCDP-49</u>	Inniskeen Enterprise & Dev Group Co.Ltd.	Inniskeen	476
<u>MN-C22-MCDP-81</u>	Glaslough Village Green Management Company Ltd	Glaslough	480
<u>MN-C22-MCDP-89</u>	Harry & Anthony Boylan	Smithborough	482
<u>MN-C22-MCDP-96</u>	Castle Leslie	Glaslough	486
<u>MN-C22-MCDP-113</u>	PJ & EJ Doherty	Inniskeen	493
<u>MN-C22-MCDP-119</u>	Gary McCaughey and Patrick Macklin	Ballinode	497
<u>MN-C22-MCDP-122</u>	Bernard Duffy and Fergus Cumiskey	Inniskeen	500
<u>MN-C22-MCDP-127</u>	Glaslough Village Green Management Company Ltd	Glaslough	503
<u>MN-C22-MCDP-129</u>	Glaslough Village Green Management Company Ltd	Glaslough	506
<u>MN-C22-MCDP-133</u>	McCaffrey Family	Emyvale	509
<u>MN-C22-MCDP-146</u>	Margaret Keenan	Smithborough	513

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-4</u>	Seamus McQuaid, c/o Fintan McPhillips	Scotshouse	92

Summary of Submission & Issues Raised

- The submission requests the inclusion of lands within the settlement envelope of Scotshouse.
- Lands adjoin the current settlement envelope and measure 0.471ha (c. 1 acre) in size. A map is included with the submission which shows the extent of the subject lands.
- A rationale for the proposed inclusion of the lands is provided as follows:
 - Lands are close to the heart of the village and directly opposite St. Enda’s National School and closer to the village than the local authority housing development and the private housing developments built in the early 2000’s – Oakland Grove and Scotshouse Close. And closer to the village centre than the community centre.
 - Lands are located outside the flood risk area.
 - Inclusion of the lands will enable the owner of the site to make a planning application for 10-12 social houses which will bring new families to the village.
 - Supports various objectives contained within the Draft County Development Plan.
 - To promote and facilitate development that is commensurate with the nature and extent of the existing villages and to support their role as local service centres and locations for housing.
 - To prepare tier 4 village plans during the lifetime of this plan, with a focus on housing, amenity, infrastructure, and parking provision.
 - Scotshouse village has a peripheral location but well served by public transport service, i.e. local link.
 - Lack of housing development in the area – search of properties to rent/buy on 26th September 2024 yielded no results.
 - Clear from Census 2022 that Scotshouse needs new houses - just 7 built in the past 15 years of which 1 was built since 2016.
 - No potential for housing development within the defined village settlement envelope.
 - The Scotshouse Community Plan was the catalyst for the commencement of a Community Childcare Service, which is now located within St Enda’s NS. Enrolment has increased from 40 to in excess of 70 and consequently is putting pressure on the school’s capacity to continue to accommodate the childcare service within its walls. Planning permission recently granted for a purpose-built childcare facility in the village close to St Enda’s NS.
 - No other potential development land when you take into account the grounds of St Andrew’s Church of Ireland, which is mostly graveyard, and the grounds of the Rectory of St Andrew’s Church.
 - Difficult to see how Scotshouse will achieve the projected growth in village population of 37 persons during the plan period without the availability of additional houses or building land within the existing village boundary.
 - Increased population will result in the local school and services thriving.

Chief Executive Response

The submission requests the inclusion of lands within the settlement envelope of Scotshouse.

Scotshouse is defined as a Tier 4 Village within the Draft Development Plan. The Core Strategy of the Development Plan recognises the role of settlements in driving the development of the County and identifies the scope of development possible for the County, while remaining consistent with National and Regional policy. It also identifies the quantum and location of development for the plan period,

consistent with the population targets and settlement hierarchy that reflects the availability of existing services, planned investment, sequential development and environmental requirements.

The designation of Scotshouse as a Tier 4 village is an acknowledgement of its importance in sustaining the vitality of its rural community and as such Objective SHO4 of the Draft Development Plan seeks *'To promote and facilitate development that is commensurate with the nature and extent of the existing villages and to support their role as local service centres and locations for housing'*. The development envelope around Scotshouse has been designated to manage the development of the village in a sustainable manner which will provide for appropriate growth as well as ensuring the protection of the village character, setting and function. The village settlement envelopes are based on the existing established footprint with the aim of consolidating existing development and promoting the regeneration of existing derelict and/or vacant sites.

There are sufficient undeveloped lands within the village envelope, which can provide for the projected population growth over the plan period. The Core Strategy and population projections set out in the Draft Development Plan set out a modest growth for the towns and villages of County Monaghan. It is considered that Section 2.6 and the relevant policies and objectives of the Plan provide for measured and sustainable growth of the Tier 4 settlements. As a result, there is no justification for the inclusion of the subject lands within the settlement limit of Scotshouse.

In recognition of the importance of Tier 4 villages in sustaining the vitality of rural communities, it is an objective of the Development Plan to prepare Tier 4 Village Plans during the lifetime of the Development Plan. It is envisaged that these plans will be delivered on a strategically phased basis following agreement with the Elected Members of Monaghan County Council.

The Tier 4 Village Plans will provide an overarching strategic framework for each of the villages and will focus on topics including housing, amenity, infrastructure, parking provision as well as sustainable reuse and regeneration. A level of community engagement will be afforded to enable interested parties to become involved in shaping the future of these villages and influence how their communities grow and develop.

In response to the OPR submission, MN-C22-MCDP-126, regarding the timeframes and focus of the village plans, it is recommended that Objective SHO 5 in Chapter 2 and VIO 4 in Chapter 9 are amended along with the inclusion of additional explanatory text in Section 9.15 as set out below.

Chief Executive Recommendation

It is recommended that Objective SHO5 in Chapter 2 and Section 9.15 and Objective VIO4 in Chapter 9 are amended as follows:

SHO 5: To prepare Tier 4 village plans during the lifetime of this plan, with a focus on housing, amenity, infrastructure, ~~and parking provision~~ **transport and the sustainable reuse and regeneration of existing derelict, vacant, or underutilised sites. At least one village plan will be prepared for a village in each of the three Municipal Districts per annum.**

9.15 Tier 4 Village Plans

In recognition of the importance of Tier 4 villages in sustaining the vitality of rural communities, it is an objective of the Development Plan to prepare Tier 4 Village Plans during the lifetime of the Development Plan. It is envisaged that these plans will be delivered on a strategically phased basis following agreement with the Elected Members of Monaghan County Council. Community engagement will be a key element to enable interested parties to become involved in shaping the future of these villages and influence how their communities grow and develop.

VIO 4: To prepare ~~plans for the Tier 4 villages~~ **plans during the lifetime of this plan, which with a focus on housing, amenity, infrastructure, parking provision and traffic calming transport during the lifetime of this plan, subject to available resources. and the sustainable reuse and regeneration of existing derelict, vacant, or underutilised sites. At least one village plan will be prepared for a village in each of the three Municipal Districts per annum.**

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-9</u>	Brightsquare Properties Ltd. c/o Genesis Planning Consultants	Lands at Maple Grove, Smithborough	93

Summary of Submission & Issues Raised

- The subject lands are designated as per the published Draft Monaghan County Development Plan 2025-2031 as within the settlement boundary.
- The proposed designation for the subject lands is appropriate, particularly in light of the 2019 planning permission (Reg Ref: 19/28) for 11 dwellings on the site, which was intended to complete the existing development in the area.
- The Applicant requests that the subject lands remain within the settlement boundary for Smithborough.
- To ensure the completion of the development permitted under Reg Ref: 19/28 it is important that the subject lands are zoned within the settlement boundary. This zoning will allow for the completion of the existing planning permission, ensuring coherent development in line with the area's established residential character and supporting the growth strategy for the village.

Chief Executive Response

The submission requests the retention of lands within the settlement envelope of Smithborough.

The submission lands are located within the proposed settlement envelope of Smithborough, a Tier 4 Village as per Core Strategy of the Monaghan County Development Plan. The Core Strategy of the Development Plan recognises the role of settlements in driving the development of the County and identifies the scope of development possible for the County, while remaining consistent with National and Regional policy. It also identifies the quantum and location of development for the plan period, consistent with the population targets and settlement hierarchy that reflects the availability of existing services, planned investment, sequential development and environmental requirements.

The designation of Smithborough as a Tier 4 village is an acknowledgement of its importance in sustaining the vitality of its rural community and as such Objective SHO4 of the Draft Development Plan seeks *“To promote and facilitate development that is commensurate with the nature and extent of the existing villages and to support their role as local service centres and locations for housing”*.

The settlement envelope around Smithborough has been designated to manage the development of the village in a sustainable manner which will provide for appropriate growth as well as ensuring the protection of the village character, setting and function. The village settlement envelopes are based on the existing established footprint with the aim of consolidating existing development and promoting the regeneration of existing derelict and/or vacant sites.

An expired Planning Permission was granted for a residential development on the subject lands under Ref No.19/28.

In recognition of the importance of Tier 4 villages in sustaining the vitality of rural communities, it is an objective of the Development Plan to prepare Tier 4 Village Plans during the lifetime of the Development Plan. It is envisaged that these plans will be delivered on a strategically phased basis following agreement with the Elected Members of Monaghan County Council.

The Tier 4 Village Plans will provide an overarching strategic framework for each of the villages and will focus on topics including housing, amenity, infrastructure, transport as well as sustainable reuse and regeneration of existing derelict, vacant, or underutilised sites. A level of community engagement

will be afforded to enable interested parties to become involved in shaping the future of these villages and influence how their communities grow and develop.

In response to the OPR submission, MN-C22-MCDP-126, regarding the timeframes and focus of the village plans, it is recommended that Objective SHO 5 in Chapter 2 and VIO 4 in Chapter 9 are amended along with the inclusion of additional explanatory text in Section 9.15 as set out below.

Given the location of the subject lands and the potential for development to contribute to the compact growth of Smithborough Village, it is appropriate that the subject lands are retained within the settlement envelope of Smithborough.

Chief Executive Recommendation

It is recommended that Objective SHO5 in Chapter 2 and Section 9.15 and Objective VIO4 in Chapter 9 are amended as follows:

SHO 5: To prepare Tier 4 village plans during the lifetime of this plan, with a focus on housing, amenity, infrastructure, ~~and parking provision~~ **transport and the sustainable reuse and regeneration of existing derelict, vacant, or underutilised sites. At least one village plan will be prepared for a village in each of the three Municipal Districts per annum.**

9.15 Tier 4 Village Plans

In recognition of the importance of Tier 4 villages in sustaining the vitality of rural communities, it is an objective of the Development Plan to prepare Tier 4 Village Plans during the lifetime of the Development Plan. It is envisaged that these plans will be delivered on a strategically phased basis following agreement with the Elected Members of Monaghan County Council. Community engagement will be a key element to enable interested parties to become involved in shaping the future of these villages and influence how their communities grow and develop.

VIO 4: To prepare ~~plans for the Tier 4 villages~~ **plans during the lifetime of this plan, which** with a focus on housing, amenity, infrastructure, ~~parking provision and traffic calming~~ **transport during the lifetime of this plan, subject to available resources. and the sustainable reuse and regeneration of existing derelict, vacant, or underutilised sites. At least one village plan will be prepared for a village in each of the three Municipal Districts per annum.**

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-20</u>	Gwen Murphy (Manager) of Doohamlet Community Centre	Lands at Doohamlet Community Centre	N/A

Summary of Submission & Issues Raised

- Pleased that Doohamlet has been designated as a tier 4 village.
- Query raised in relation to the current flood risk area shown in the vicinity of Doohamlet Community Centre, also along the west bank and opposite the Community Centre.
- Does not appear to have taken into consideration the change of levels or contours on the ground at present.
- Concerns regarding future development of the site and insurance of the buildings going forward if the flood risk area on the map remains.
- Requests that the boundary is reviewed and moved closer to the river, particularly on the community centre side (east side) of the river.

Chief Executive Response

The comments in respect of Doohamlet's designated as a tier 4 village and the change of levels and contours on the ground at present are noted.

The site is partially located in a Flood Zone based on the Office of Public Works NIFM 2021 mapping and although comments have been submitted advising that the levels have changed along with contours, no detailed Flood Risk Assessment was submitted with this submission that would challenge the NIFM 2021 mapping. However, regardless of the extent of the Flood Zones, the proximity of an NIFM mapped watercourse will require site-specific modelling and a Stage 3 Flood Risk Assessment for any future development.

The matters pertaining to insurance of the buildings fall outside the remit of planning.

Chief Executive Recommendation

No amendment recommended.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-49</u>	Inniskeen Enterprise & Development Group (IEDG) Ltd	Inniskeen Village	N/A

Summary of Submission & Issues Raised

Introduction

- The submission notes that the Inniskeen Enterprise & Development Group Ltd. organised a comprehensive public consultation meeting on Wednesday, 6th November 2024 which was attend by 154 community stakeholders to discuss the Draft Development Plan.
- Survey responses indicate that 73% of participants consider infrastructure, particularly roads and transport, to be a top priority for the community, while 75% emphasised the need for enhanced recreational facilities, and 67% stressed the importance of health and social care.
- The Draft Monaghan County Development Plan estimates Inniskeen’s current population at approximately 400 residents, yet this figure does not align with data from the Central Statistics Office (CSO), which reported a population of 2,832 for the Parish of Inniskeen in 2021.
- Inniskeen Parish is geographically spread over approximately 25 square kilometres and depends on the amenities, facilities and communal spaces within the village heart to avail of educational, cultural and recreational spaces
- St. Daigh’s Inniskeen National School has grown from 97 students two decades ago to a current enrolment of 287, underscoring a significant demographic shift.
- This population growth has placed substantial pressure on local amenities, infrastructure, and public spaces, a situation exacerbated by insufficient planning in prior development strategies.
- Survey results show that 88% of respondents support enhanced walking and cycling routes, reflecting a clear community desire for more accessible and sustainable social options.
- Given the notable population increase and increased usage of village resources, an expanded development area for Inniskeen is essential to ensure future sustainability.

Increased Development Area for Infrastructure and Amenities

- The community unanimously supports a larger development area within the CDP to accommodate essential infrastructural improvements. Currently, over 60% of respondents rated village infrastructure such as drainage, public spaces, and parking as ‘poor’ or ‘very poor’, with parking issues being particularly acute around the village centre and school.
- The Monaghan County Development Plan defines the ‘Community Facilities and Services’ zoning as aiming ‘to protect, provide and improve community, civic and educational facilities’. This aligns with the community’s goal to expand and improve amenities that can serve Inniskeen’s growing population over the next 20 years.
- The submission notes the Pre-Draft Submission made by The Department of Education dated 3rd July 2024 in relation to the Monaghan County Development Plan 2025-2031. A copy of the correspondence is attached to the submission.
- IEDG therefore supports this submission from the Department of Education in the context of the development of Inniskeen and the community requests that provision is made in the Monaghan County Council 2025-2031 for a new school site.
- The County Development Plan should include specific policy objectives in regards Inniskeen, with the current development envelope to be expanded as deemed appropriate by the Local Authority.
- The submission refers to Policy VIO3 of the draft plan which seeks ‘to facilitate additional community facilities and services within the village envelope where no other suitable sites are available where possible and on the fringes of the village envelope where no other suitable sites are available’.

- IEDG requests that the development envelope is increased appropriately, with the aim to consolidate the existing development pattern of the village, in order to provide additional lands for community, civic and educational facilities.

Parking and Traffic Management for Cultural Tourism and Village Heart

- Inniskeen experiences notable congestion, particularly around St. Daigh's National School, the Community Centre, Childcare Facilities, Graveyard and Patrick Kavanagh Centre all of which are located in very close proximity of each other. Survey responses overwhelmingly emphasised the need for enhanced parking solutions and traffic flow management to alleviate this congestion and support the village's growing role as a cultural tourism destination.
- The proposed development area should include designated parking to accommodate both civic activities and tourist demand, addressing these issues through sustainable urban planning measures.

Preservation of Heritage and Expansion of Public Realm Enhancements

- The community values Inniskeen's heritage sites and rural village charm, and any development should reflect this identity. There is robust support for Monaghan County Council's Inniskeen Public Realm proposal launched in 2021, which has laid a foundation for these enhancements.
- Implementing the Public Realm proposal will enrich the village, fostering local pride and attracting tourism. We encourage prioritising these works within the CDP to build on the momentum already established.

Recreational and Green Spaces for Quality of Life

- Inniskeen's population has voiced a strong desire for expanded and upgraded recreational amenities, including safe green spaces, playgrounds, and outdoor gathering areas. Survey results indicate that 78% of respondents would utilise an improved community playground and park.

Community Facilities & Civic Amenities to Support a Diverse Population

- The need for more inclusive facilities for youth, elderly residents, and those with mobility issues was a recurring theme. Survey feedback shows a clear need for a multi-use community space that can serve as a focal point for local activities and social services. 76% expressed interest in local primary healthcare facilities, highlighting gaps in essential services and amenities. Such facilities would align with the county's objectives to foster cohesive and sustainable community development.

Concluding Remarks

- To ensure Inniskeen's sustainable growth and community well-being, IEDG requests that Monaghan County Council prioritise the following:
 - Urgent Provision of Parking: Inadequate parking around St. Daigh's National School and the village centre is not only inconvenient but poses a significant health and safety risk, particularly for children. Addressing this will also support Inniskeen's position as a welcoming destination for cultural tourism.
 - Enhanced Community Facilities and Services: Given the projected growth over the next 20 years, it is essential to expand community, civic, and recreational facilities to sustain Inniskeen's development. This aligns directly with the zoning definition in the Monaghan County Development Plan; To protect, provide and improve community, civic and educational facilities.
 - Implementation of the Inniskeen Spatial Plan: The Spatial Plan, commissioned by Monaghan County Council in 2021, offers a comprehensive approach to enhancing Inniskeen's public realm and should be adopted as council policy to ensure cohesive and strategic village development.
 - Enlargement of the Development Area: The current development envelope does not meet the sustainable growth needs of Inniskeen's stakeholders. An expanded development area is critical for accommodating future infrastructure social, civic amenities and community facilities. Please refer to the Inniskeen map within the

Monaghan County Development Plan to consider boundary adjustments that will support the community's long-term growth.

- The Inniskeen Enterprise & Development Group Ltd. is prepared to collaborate closely with Monaghan County Council to achieve a long-term strategic Master Plan that supports Inniskeen's growth in alignment with sustainable development goals. Our community stands ready to partner with Monaghan County Council, sharing insights and resources to develop a thriving and inclusive future for Inniskeen

Chief Executive Response

Inniskeen is defined as a Tier 4 Village within the Draft Development Plan and its pronounced population increase of 38.7% between 2006-2022 is acknowledged within the Plan. The designation of Inniskeen as a Tier 4 village is an acknowledgement of its importance in sustaining the vitality of its rural community and as such Objective SHO4 of the Draft Development Plan seeks '*to promote and facilitate development that is commensurate with the nature and extent of the existing villages and to support their role as local service centres and locations for housing*'. The settlement envelope around Inniskeen has been designated to manage the development of the village in a sustainable manner which will provide for appropriate growth as well as ensure the protection of the village character, setting and function. The village development envelopes are based on the existing established footprint with the aim of consolidating existing development and promoting the regeneration of existing derelict and/or vacant sites.

There are sufficient undeveloped lands within the village settlement envelope, 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. It is considered that Section 2.6 and the relevant policies and objectives of the Plan provide for measured and sustainable growth of the Tier 4 settlements.

Lands are not zoned for specific uses within the villages in order to provide for a less restrictive approach to the suitable expansion and growth of the villages, however as noted within the submission, Objective VIO3 of the Plan does seek '*to facilitate additional community facilities and services within the village envelope where no other suitable sites are available where possible and on the fringes of the village envelope where no other suitable sites are available*'. Having regard to the provisions of this objective, it is not considered necessary to zone a specific site for a new school.

The Development Plan contains, within Chapter 15 Development Management Guidelines, car parking spaces requirements appropriate to the type and location of development proposed. An assessment of development proposals is done on a case-by-case basis through the development management process.

In recognition of the importance of Tier 4 villages in sustaining the vitality of rural communities, it is an objective of the Development Plan to prepare Tier 4 Village Plans during the lifetime of the Development Plan. It is envisaged that these plans will be delivered on a strategically phased basis following agreement with the Elected Members of Monaghan County Council.

The Tier 4 Village Plans will provide an overarching strategic framework for each of the villages and will focus on topics including housing, amenity, infrastructure, parking provision as well as sustainable reuse and regeneration. A level of community engagement will be afforded to enable interested parties to become involved in shaping the future of these villages and influence how their communities grow and develop.

In response to the OPR submission, MN-C22-MCDP-126, regarding the timeframes and focus of the village plans, it is recommended that Objective SHO 5 in Chapter 2 and Objective VIO 4 in Chapter 9 are amended along with the inclusion of additional explanatory text in Section 9.15 as set out below.

Chief Executive Recommendation

It is recommended that Objective SHO5 in Chapter 2 and Section 9.15 and Objective VIO4 in Chapter 9 are amended as follows:

SHO 5: To prepare Tier 4 village plans during the lifetime of this plan, with a focus on housing, amenity, infrastructure, ~~and parking provision~~ **transport and the sustainable reuse and regeneration of existing derelict, vacant, or underutilised sites. At least one village plan will be prepared for a village in each of the three Municipal Districts per annum.**

9.15 Tier 4 Village Plans

In recognition of the importance of Tier 4 villages in sustaining the vitality of rural communities, it is an objective of the Development Plan to prepare Tier 4 Village Plans during the lifetime of the Development Plan. It is envisaged that these plans will be delivered on a strategically phased basis following agreement with the Elected Members of Monaghan County Council. Community engagement will be a key element to enable interested parties to become involved in shaping the future of these villages and influence how their communities grow and develop.

VIO 4: To prepare ~~plans for the Tier 4 villages~~ **plans during the lifetime of this plan, which** with a focus on housing, amenity, infrastructure, ~~parking provision and traffic calming~~ **transport during the lifetime of this plan, subject to available resources.** **and the sustainable reuse and regeneration of existing derelict, vacant, or underutilised sites. At least one village plan will be prepared for a village in each of the three Municipal Districts per annum.**

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-81</u>	Glaslough Village Green Management Company Limited By Guarantee	Glaslough Village, Co. Monaghan.	N/A

Summary of Submission & Issues Raised

This submission notes and appreciates the council's dedication to preserving local heritage. By Maintaining the architectural and cultural heritage not only does it strengthen community identity but also draws visitors who contribute to the local economy.

The submission makes a number of proposals regarding heritage in Glaslough Village:

- **Cobbled Stone:** The installation of cobbled stone around the whole diamond area leading down both sides of the Main Street and New Line. This would bring the village back as near to its original format as possible, especially as Glaslough is seeking to get Heritage Status for the village. The introduction of these cobbled streets was designed also to slow traffic down in and on approach to the centre of the Diamond area of the village which is a very busy area.

Discussions have taken place with Monaghan Municipal that the agreed cobbling would be in line with the village limestone architecture with the famine walls and stone buildings. Furthermore, these would have to be accessible and easy to walk on also, unlike the olden days type of cobbles which may have been dangerous to walk on.

- **Location and Extension of ACA:** Glaslough Village is a proposed Architectural Conservation Area because of the special character of its streets and environs and their close historic relationship to the adjacent Castle Leslie estate. It is a good example of an estate village and both it and the estate retain much of their built fabric and natural setting. In keeping with this, the submission proposes that the village green development of 72 houses to be included and which need to be protected as part of the village heritage. Reference is made to Section 1.3 of the Glaslough ACA Report which details the location of the ACA. A map of the village is also provided with the submission.

Chief Executive Response

The draft Development Plan designates Glaslough as a Tier 4 Village. In recognition of the importance of Tier 4 villages in sustaining the vitality of rural communities, it is an objective of the Development Plan to prepare Tier 4 Village Plans during the lifetime of the Development Plan. It is envisaged that these plans will be delivered on a strategically phased basis following agreement with the Elected Members of Monaghan County Council. In response to the OPR submission, MN-C22-MCDP-126, regarding the timeframes and focus of the village plans, it is recommended that Objective SHO 5 in Chapter 2 and VIO 4 in Chapter 9 are amended along with the inclusion of additional explanatory text in Section 9.15 as set out below.

The Tier 4 Village Plans will provide an overarching strategic framework for each of the villages and will focus on topics including housing, amenity, infrastructure, parking provision as well as sustainable reuse and regeneration. A level of community engagement will be afforded to enable interested parties to become involved in shaping the future of these villages and influence how their communities grow and develop.

As referenced, Glaslough Village is designated as an Architectural Conservation Area (ACA) and submission requests an extension of the ACA boundary. It is an objective of the development plan

(ACO 1) is “to carry out a comprehensive review of the Architectural Conservation Areas within the County during the lifetime of this Plan”. This objective has been amended as per response O9(ii) of the response to the OPR Submission, MN-C22-MCDP-126.

Chief Executive Recommendation

It is recommended that Objective SHO5 in Chapter 2, Section 9.15 and Objective VIO4 in Chapter 9 are amended as follows:

Villages Objective	
SHO 5	To prepare Tier 4 village plans during the lifetime of this plan, with a focus on housing, amenity, infrastructure, and parking provision transport and the sustainable reuse and regeneration of existing derelict, vacant, or underutilised sites. At least one village plan will be prepared for a village in each of the three Municipal Districts per annum.

It is also recommended that Objective VIO 4 within Section 9.15 in Chapter 9 – Strategic Objectives for Settlements is amended as indicated below:

9.15 Tier 4 Village Plans

In recognition of the importance of Tier 4 villages in sustaining the vitality of rural communities, it is an objective of the Development Plan to prepare Tier 4 Village Plans during the lifetime of the Development Plan. It is envisaged that these plans will be delivered on a strategically phased basis following agreement with the Elected Members of Monaghan County Council. Community engagement will be a key element to enable interested parties to become involved in shaping the future of these villages and influence how their communities grow and develop.

Tier 4 Villages Objectives	
VIO 4	To prepare plans for the Tier 4 villages plans during the lifetime of this plan, which with a focus on housing, amenity, infrastructure, parking provision and traffic calming transport during the lifetime of this plan, subject to available resources. and the sustainable reuse and regeneration of existing derelict, vacant, or underutilised sites. At least one village plan will be prepared for a village in each of the three Municipal Districts per annum.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-89</u>	Harry and Anthony Boylan c/o CS Pringle	Lands at Smithbrough	94

Summary of Submission & Issues Raised

The submission requests the inclusion of lands within the settlement envelope of Smithborough and to be zoned as Residential.

Executive Summary

- The draft Development Plan 2025-2031 by Monaghan County Council proposes to retain the current development boundaries for Smithborough village.
- The subject lands are north of Smithborough, off the LS06100 road, adjacent to the designated Recreation & Amenity Zone (Éire Og GAA playing fields). This area lies just outside the proposed development limit, although part of these lands was previously included within the development boundary in the Smithborough Local Area Plan 2002-2007 and the Monaghan County Development Plan 2007-2013.
- a residential housing development is proposed on these lands, which would supply much-needed housing for the Smithborough community. The existing area within the development boundary that was included with the development zone in the previous development plan is currently at the additional information stage, and subject to planning approval, our client intends to commence works in Q1 2025. It would be then our clients intention to develop the lands contained with MN26720F/26721F with further private and possibility social and affordable housing.

Existing historical background

- A portion of these lands was included in the Development Plan 2007-2013 and the Smithborough Local Area Plan 2002-2007. While other lands zoned for development in Smithborough have not been developed, the Meadows Development remains the notable exception since 2009. Many of the currently zoned lands are held by owners who do not intend to undertake any new housing projects which is clear given the inactivity in the past 15 years on these lands. This risks impeding Smithborough’s and indeed County Monaghan planned growth and housing targets.
- Smithborough, a Tier 4 town, has grown from a population of 309 in 2006 to 495 in 2022—an increase of approximately 60%. This population is expected to rise to 553 by 2031, a further 20% increase. The landowners have played a central role in meeting this demand, with the Meadows Development on the Clones Road accommodating around 50% of the new residents between 2016 and 2022.
- There is a pressing need for additional residential housing in Smithborough. The lands owned are strategically located with ideal access for a residential development while maintaining proximity to village amenities. This site is visually linked to Smithborough and would not represent undesirable ribbon development or urban sprawl.

Development Plan 2025-2031

- The landowner is a respected developer having completed ‘The Meadows’ housing development to the West of Smithborough village with the entirety being occupied at present.
- All infrastructure needed to services for such a proposed housing development for this site are in place or in some instances such as footpaths and public lighting which stop adjacent to the site can be extended easily to readily accommodate this proposal.
- As outlined in the NPF ‘Ireland 2040’ *“In developing Ireland 2040, it is apparent that we have so many authentic communities and places with so much potential that there is no clear*

justification for the creation of entirely new settlements. It is the case, however, that many of our urban places are in need of improvement, regeneration and revitalisation and that many of our rural places are either at risk from urban-generated overspill or are suffering from depopulation. This doesn't mean that we need to start again, elsewhere, but it does mean that we need to accommodate our changing needs in a way that facilitates growth, improvement and regeneration, to bring new life and vitality to places, while avoiding overdevelopment." It is our opinion that the development proposed does exactly this and therefore the rezoning of these lands should be considered.

- The national policy objective 3a. states that we must *"Deliver at least 40% of all new homes nationally, within the built-up envelope of existing urban settlements"*. Given the location of this site as being visually linked with the centre of Smithborough village, the rezoning of these lands would enable this development to contribute to this target.
- NPF 'Ireland 2040' states that *"Opportunities exist to create the conditions to support residential development in rural towns, whether through parking and streetscape improvements, traffic diversions, the provision of small scale urban amenities such as open spaces or playgrounds, the acquisition of key sites and/or the opening up or amalgamation of backlands and the provision of services such as waste-water treatment."* It is our opinion that this statement is supportive of the development proposed for the subject land.
- 2.4.2 Housing Land Requirement of the Draft Monaghan County Development Plan 2019 – 2025 states that *"Provide for lower density housing on zoned land to expand the options for residential development and offer a wider choice of housing within the designated settlements as an alternative to rural one-off housing."* This development would be an alternative for the Smithborough area. With the occupation of new housing developments and the decreased supply of housing developments in Smithborough, there is an increasing demand for housing and to meet this demand home buyers, particularly from the area are forced to build one-off houses in the countryside which is leading to built up areas and in some case overdevelopment which is spoiling the surrounding countryside.

Site Details

- The site topography would lend itself to a residential development and the proposal would integrate onto the site and its surroundings in a sympathetic manner with a backdrop of existing mature trees to the rear.
- The site is close to the village centre which will enable the residents to access the same amenities and services by all village residents.
- Smithborough is located halfway between Monaghan and Clones and would be an attractive location for home buyers who commute to and from Monaghan or Clones.

Conclusion

To conclude, the rezoning of these lands which were originally zoned for residential housing will;

- Allow for much needed affordable residential housing in the Smithborough village and will be in keeping with the existing residential pattern, general design, layout, site size and character of the existing village.
- Given its location the development could be easily accommodated as the infrastructure and services are in place such as existing foul sewerage pipe-line, mains water supply, ESB, Eircom, Broadband, public footpath, and public lighting etc. all existing at this location at present.
- The site is within walking distance of the town centre on the existing public footpath which has public lighting.
- The proposal will be in line with the policies set out in the Places for People – the National Policy on Architecture, Climate Action Plan 2023, (NPF) National Planning Framework, National Spatial Strategy, Sustainable and Compact Settlements Guidelines for Planning Authorities and the Housing for All.

- As established developers within the town of Smithborough having established themselves as reputable builders through the construction of the ‘The Meadows’ development. The lands to which we are seeking your consideration for inclusion within the development limits would allow our clients to continue to provide their quality product within the village.

Chief Executive’s Response

The submission requests the inclusion of lands within the settlement envelope of Smithborough and to be zoned as Residential.

The subject lands are located outside the development envelope for Smithborough, a Tier 4 Village as per Core Strategy of the Draft Monaghan County Development Plan 2025-2031.

The Core Strategy of the Development Plan recognises the role of settlements in driving the development of the County and identifies the scope of development possible for the County, while remaining consistent with National and Regional policy. It also identifies the quantum and location of development for the plan period, consistent with the population targets and settlement hierarchy that reflects the availability of existing services, planned investment, sequential development and environmental requirements.

The designation of Smithborough as a Tier 4 village is an acknowledgement of its importance in sustaining the vitality of its rural community and as such Objective SHO4 of the Draft Development Plan seeks *“To promote and facilitate development that is commensurate with the nature and extent of the existing villages and to support their role as local service centres and locations for housing”*.

The settlement envelope around Smithborough has been designated to manage the development of the village in a sustainable manner which will provide for appropriate growth as well as ensuring the protection of the village character, setting and function. The settlement envelopes are based on the existing established footprint with the aim of consolidating existing development and promoting the regeneration of existing derelict and/or vacant sites. Lands are not zoned for specific uses within Smithborough Village, in order to provide for a less restrictive approach to the suitable expansion and growth of the village.

There are sufficient undeveloped lands within the settlement envelope, which can provide for the projected population growth over the plan period. The Core Strategy and population projections set out in the Draft Development Plan set out a modest growth for the towns and villages of County Monaghan. It is considered that Section 2.6 of the Draft Development Plan and the relevant policies and objectives therein provide for measured and sustainable growth of the Tier 4 settlements.

In recognition of the importance of Tier 4 villages in sustaining the vitality of rural communities, it is an objective of the Development Plan to prepare Tier 4 Village Plans during the lifetime of the Development Plan. It is envisaged that these plans will be delivered on a strategically phased basis following agreement with the Elected Members of Monaghan County Council.

The Tier 4 Village Plans will provide an overarching strategic framework for each of the villages and will focus on topics including housing, amenity, infrastructure, transport as well as sustainable reuse and regeneration of existing derelict, vacant, or underutilised sites. A level of community engagement will be afforded to enable interested parties to become involved in shaping the future of these villages and influence how their communities grow and develop.

In response to the OPR submission, MN-C22-MCDP-126, regarding the timeframes and focus of the village plans, it is recommended that Objective SHO 5 in Chapter 2 and VIO 4 in Chapter 9 are amended along with the inclusion of additional explanatory text in Section 9.15 as set out below.

Based on the above, the inclusion of lands within the settlement envelope of Smithborough and to be zoned as Residential, is not recommended.

Chief Executive's Recommendation

It is recommended that Objective SHO5 in Chapter 2 and Section 9.15 and Objective VIO4 in Chapter 9 are amended as follows:

SHO 5: To prepare Tier 4 village plans during the lifetime of this plan, with a focus on housing, amenity, infrastructure, ~~and parking provision~~ **transport and the sustainable reuse and regeneration of existing derelict, vacant, or underutilised sites. At least one village plan will be prepared for a village in each of the three Municipal Districts per annum.**

9.15 Tier 4 Village Plans

In recognition of the importance of Tier 4 villages in sustaining the vitality of rural communities, it is an objective of the Development Plan to prepare Tier 4 Village Plans during the lifetime of the Development Plan. It is envisaged that these plans will be delivered on a strategically phased basis following agreement with the Elected Members of Monaghan County Council. Community engagement will be a key element to enable interested parties to become involved in shaping the future of these villages and influence how their communities grow and develop.

VIO 4: To prepare ~~plans for the Tier 4 villages~~ **plans during the lifetime of this plan, which with a focus on housing, amenity, infrastructure, ~~parking provision and traffic calming~~ transport during the lifetime of this plan, subject to available resources. and the sustainable reuse and regeneration of existing derelict, vacant, or underutilised sites. At least one village plan will be prepared for a village in each of the three Municipal Districts per annum.**

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-96</u>	Castle Leslie Estate c/o Turley	Castle Leslie Estate & Glaslough Village	N/A

Summary of Submission & Issues Raised

The submission provides commentary on the following:

- Castle Leslie
- Glaslough
- Strategic Aim and Objectives
- Tourism
- Historic Houses and Designed Landscapes
- Architectural Heritage

Castle Leslie

The submission provides a number of comments in relation to Castle Leslie, including the variety of accommodation and dining options, and the range of on and off-site activities offered. Submission notes that Castle Leslie Estate has been voted by the public as 'Ireland's Favourite Place to Stay' for in 2022, 2023 and 2024. Submission also acknowledges the County Councils Tourism Strategy and its reference to Castle Leslie Estate being internationally significant. The submission outlines recent extensive restoration works which have taken place at the Estate and outlines the future growth ambitions.

Castle Leslie Estate employs over 200 local people at the height of the season and contributes over 10m euro to the local economy. It is the owners intention to develop Castle Leslie Estate into Ireland's most compelling eco-estate destination with any future development anchored in the well-being of the locally community. To achieve this the Estate has develop a number of signature projects which demonstrates the diversity, depth, breadth and reach possible.

Submits that the representation focuses on ensuring that Monaghan has a robust County Development Plan which is suitable to deliver the aspirations of Castle Leslie Estate for the good of the wider community. Encourage Monaghan County Council to consider recommendations in light of the significant environmental, historical and economic role of Castle Leslie Estate.

Glaslough

- The Draft Plan identifies Glaslough as 1 of 14 villages in 'Tier 4 of the Core Strategy Settlement Hierarchy'.
- The Draft Plan advises that inclusion of the 'Tier 4 – Villages' as part of the proposed Settlement Hierarchy '*... is an acknowledgement of their importance to the rural areas of County Monaghan in sustaining the vitality of rural communities. Each village has the necessary infrastructural capacity available to ensure they can continue their function as local growth settlements and serve the needs of their hinterlands. These villages provide services to rural communities, including housing, neighbourhood level retail and social facilities which are critical to the on-going viability of these rural communities.*'
- The Draft Plan advises that these larger villages '*... will also be encouraged to create new local employment opportunities as well as providing services to the population within their hinterlands.*' The Draft Plan contains the following objectives for the 'Tier 4 Villages', which include Glaslough:
Tier 4 Village Strategic Objective: VSO 1
Tier 4 Village Objective: VIO 1, VIO 2, VIO 3, VIO 4
Village Objectives: SHO 4, SHO 5

Submits that the retention of Glaslough's status as a larger village within 'Tier 4' of the Draft Plan's Settlement Hierarchy is welcomed noting the important rural service role that it performs for the population within its hinterland and also noting its tourism role in support of the Castle Leslie Estate.

Strategic Aim and Objectives

- Submission refers to the Draft Plan setting out a 'Strategic Aim' for the County which will be pursued by 10 overarching strategic objectives of the plan i.e SO 1- SO 10.
- Proposed Strategic Objective SO 6 is of particular note with respect to the Castle Leslie Estate and Glaslough as it relates to the County's rich natural resources, heritage, tourism assets and amenities.
- Noting the important role of these assets, and the contribution that they make to the County, it is vital that 'Strategic Objective SO 6' incorporates a clear intention to support the enhancement of these assets and provides appropriate flexibility to enable the assets to capitalise on opportunities that would help them to fulfil their full potential, improve their overall value/ offering, further enhance their contribution to the County and assist with their maintenance/ upkeep.
- Respectfully request that the wording of proposed Strategic Objective SO 6 is amended as follows:

"SO 6: To protect, nurture and enhance the County's rich natural resources, heritage, tourism assets and amenities along with the environmental quality of the natural and built environment in both the urban and rural areas".

Tourism

- Submission refers to Section 4.12 of the Draft Plan which states '*Tourism is an emerging sector in County Monaghan providing both economic and social advantages to the area.*' The Draft Plan notes that '*A successful tourism sector can bring about other significant benefits for other sectors such as agriculture, food and drinks, accommodation providers, transport and retail.*'
- Submission also refers to section of 15.16 of the Draft Plan which confirms that '*It is important that the Tourism sector within County Monaghan is developed in a sustainable manner that supports integration within communities and optimises the economic benefit for the County.*' It then advises that '*In general, the Council shall encourage and promote the development of tourist facilities, attractions and accommodation in order to develop this industry throughout County Monaghan. In the rural area, the Council shall encourage the provision of tourist accommodation and facilities in appropriate locations where the development is considered necessary to the nature and purpose of the proposed development and meets a clearly identified site- specific tourism need.*'
- The Draft Plan notes that '*Whilst the tourism sector of the County has made considerable progress over the last decade in relation to signature tourism projects such as...the estate of Castle Leslie, progress can still be made in relation to fulfilling the County's tourism potential.*' (submission emphasis)
- Castle Leslie is also named among County Monaghan's 'unique attractions' and Glaslough is described as an award-winning estate village and a destination of unique character in the north of the County.
- Submission notes that the Draft Plan contains 23 objectives with respect to tourism (TMO 1 – TMO 23). Objectives TMO 8 and TMO 11 are of particular note with respect to the Castle Leslie Estate and Glaslough.

TMO 8: To facilitate, *where appropriate*, the provision of high- quality sustainable tourism products and services within the County in order to increase the level of activity and the

sustainability of the tourism market. In particular the provision of quality hotels and other forms of tourism accommodation, and the development of tourism projects, facilities, activities, and attractions shall be a priority.

TMO 11: To promote *appropriate* innovation and entrepreneurship in the tourism sector, subject to compliance with other policies of the Monaghan County Development Plan 2025-2031, including those relating to settlements, amenities, environment, heritage, landscapes and technical design standards. In particular, the Council shall support the development and enhancement of the 'Borderlands' concept.'

- Submission identifies that Policy TOUP 1 is also of note.
- Submission welcomes the Draft Plan's acknowledgement of the importance of the emerging tourism sector for County Monaghan. This is particularly important for Monaghan County noting that the 'Monaghan Destination & Experience Development Plan (MDEDP) 2022' classifies Monaghan as an 'Aspiring' destination.
- Submission states that the following extracts from the MDEDP are of note:

'Based on Fáilte Ireland' s destination maturity criteria, Monaghan is classified as an 'Aspiring' destination, requiring an immediate focus on building effective local tourism networks, maximising the potential of the existing tourism product base and improving the visitor infrastructure.'

By addressing these requirements, an appropriate mix of interventions will be applied to build a distinctive Monaghan visitor destination. The immediate focus will be (i) the development of tourism clusters (ii) to create local conditions to increase reasons for visitors to consider Monaghan for a holiday and (iii) to increase their length of stay within the county.

The DEDP will promote a collaborative approach where tourism industry partners will cross sell, adopt new approaches and develop motivational Monaghan visitor itineraries. It will sustainably maximise the potential of destination assets such as the Ulster Canal, Sliabh Beagh, the Patrick Kavanagh Centre, Rossmore Forest Park and Castle Leslie Estate, as year- round attractors, and a base from which to grow additional supporting experiences.' (Submission emphasis)

- Submission highlights that it is an objective of the MDEDP to *"Capitalise on the wide range of opportunities Castle Leslie Estate offers"* and identifies the Castle Leslie Walled Gardens / Green Box as a 'Hero Project'.
- The proposed Tourism Objectives and Policies of the Draft Plan recognise that there could be unforeseen and imaginative tourism projects. However, noting the challenging and competitive nature of the tourism sector, and Monaghan's current 'Aspiring' destination status, additional flexibility could be built into the relevant objectives to: help remove uncertainty; foster investor confidence; facilitate further investment and opportunities; and reduce potential for any unintended consequences.
- In this regard, submission would welcome removal of 'appropriate' from proposed objectives TMO 8 and 11, or provision of clarifications in terms of what is considered 'appropriate' in the context of the Draft Plan.
- The MDEDP contains an objective to create 'Destination/ Visitor Hubs', including at Glaslough, which align with, and will help to deliver, Strategic Objectives of Failte Ireland's 'The Ireland Ancient East Regional Tourism Strategy 2022 – 2026'. For clarity and consistency, MCC is respectfully requested to consider including a similar objective/ policy in the Draft Plan which supports the development of a 'Destination/ Visitor Hub' at Glaslough.

The Draft Plan's acknowledgement of the importance of the Castle Leslie Estate as a signature tourism project, a unique attraction and its overall importance and contribution to tourism in the County. Not this, the submission respectfully request that Monaghan County Council consider:

- Amending 'The award- winning estate village, Glaslough, is a destination of unique character in the north of the County' to be consistent with the wording used in the 'Tourism Strategy for County Monaghan 2023- 2028' and recognise Castle Leslie's international significance, i.e. 'The award- winning estate village, Glaslough, with the internationally significant Castle Leslie Estate, is a destination of unique character in the north of the county.'
- Including an additional Tourism Objective as follows: '*In Glaslough and the Castle Leslie Estate, it is recognised that there is the potential and capacity for a day visitor attraction and associated sensitive development to complement the existing hospitality offering at Castle Leslie, building on the history, environment and heritage of the Estate and Village.*'

Historic Houses and Designed Landscapes

- Section 6.19 of the Draft Plan identifies 'Castle Leslie Estate/ Demesne, Glaslough' as one of 10 'Historic Houses/ Demesnes' in County Monaghan.
- Within the Castle Leslie Estate there are approximately 19 items identified in the Record of protected Structures.
- Castle Leslie is also identified in the National Inventory of Architectural Heritage and is provided with a 'National Rating'.
- Submission refers to 'Designed Landscape Policies' and 'Historic Houses, Demesnes and Designed Landscape Policies' DLP 1, DLP 2, HHDLP 1 which are considered to be of note in respect to Castle Leslie.
- The proposed policies align with those of the current MCDP and outline a balanced approach to protecting, restoring and enhancing the natural and built heritage by facilitating new development in the vicinity of historic houses/demesne and within designated landscapes which does not adversely affect the important features of the structures/demesne/landscapes.
- Submission welcomes the positive language of Section 15.3.4, however, noting the challenges associated with maintaining and improving heritages assets, MCC is respectfully requested to consider including specific wording in the relevant policies which outlines support for proposals which seek to reduce dereliction and disrepair and/or facilitate the maintenance, enhancement and longevity of the natural and built environment.

Architectural Heritage

- Submission refers to section 6.17.1 Architectural Heritage of the DMCDP.
- Whilst the Draft Plan refers to potential funding initiatives, submission notes that there is currently no policy provision included within the DMCDP which would allow historic assests to explore alternative financial funding mechanisms such as enabling development, to assist with maintenance and upkeep costs of a protected structure.
- Enabling development typically seeks to subsidise the cost of maintenance, major repair or conversion to the optimum viable use of a building where this is greater than its value to its owner or market value. The justification for allowing the enabling development lies in the overriding public benefit to be derived from the implementation of the principal proposal which otherwise would have little prospect of being carried out.
- Submission considers that this is an oversight by the Council and that consideration should be given to including a policy which would support enabling developments required to part fund the upkeep and maintenance of protected structures. There are numerous best practice examples of where similar policy has been applied in the UK and the benefits of such a policy

could be considered significant in preventing the loss or deterioration of the County's Architectural Heritage.

- Submits that the amendments / additions to the Draft Plan as outline will help to provide a more supportive local policy context for the Castle Leslie Estate and ensure that the final MCDP 2025-2031 does not contain, or create, any unintended negative effects for the development potential of the subject lands.

Chief Executive Response

The submission includes a number of suggested amendments to the draft Development Plan.

Suggested amendment to Strategic Objective SO 6: "SO 6: To protect, nurture *and enhance* the County's rich natural resources, heritage, tourism assets and amenities along with the environmental quality of the natural and built environment in both the urban and rural areas". The inclusion of the words 'and enhance' are considered to be an acceptable amendment, SO 6 will therefore be amended accordingly.

The removal of 'appropriate' from proposed objectives TMO 8 and 11. The word 'appropriate' is considered to be an important element of objectives TMO 8 and TMO 11. Any development should be appropriate to the nature and scale of its setting so the term 'appropriate' shall remain. The wording shall be amended to provide further clarification on 'appropriate'.

In response to the request to include an objective/ policy in the Draft Plan which supports the development of a 'Destination/ Visitor Hub', this is considered to be adequately addressed under objective TMO 2 *'To promote the development of destination hubs in towns and villages across County Monaghan'*.

The submission makes some recommendations in respect of including additional reference to Castle Leslie Estate and objective to support a day visitor attraction within Glaslough. The support of tourism development across the County, including Glaslough is considered to be adequately addressed within Tourism Objectives within Chapter 4 and also Tourism Objectives within Chapter 9.

In respect of the request to include specific wording to support proposals which seek to reduce dereliction and disrepair and/or facilitate the maintenance, enhancement and longevity of the natural and built environment, it is considered that the Monaghan County Development Plan policies and objectives are considered to provide support as requested, and no further amendments are required adequate support for same. Chapter 6 of the Draft County Development Plan *"Heritage, Conservation and Landscape"*, *acknowledge that Monaghan County Council is committed to working with relevant agencies, communities and individuals to ensure the conservation, protection and enhances of our natural and built heritage can be realised*". Furthermore, Heritage, Conservation, Biodiversity and Landscape Strategic Objective, HCLSO 1 *"To promote and encourage the conservation and preservation of the County's natural environment, cultural heritage and amenities in accordance with legislation, plans and policies developed to specifically address these areas and to ensure a rich cultural landscape, healthy environment and the full provision of ecosystems services in The County"*. Draft Development Plan Policy and Objective wording contained within Chapter 6 around the conservation, protection, preservation and enhancement supports proposals which would reduce dereliction and disrepair.

The suggestion to include a policy in relation enabling development is noted. The principle of 'Enabling development' relates to a development proposal that is contrary to planning policy and in its own right would not be permitted but may be allowed where it would secure a proposal for the long term future

of a significant place. Allowing development which would be contrary to the spirit of policies and objectives contained within Chapter 6 is not recommended. As such an ‘Enabling Development Policy’ would be considered to be an inappropriate addition to the County Development Plan. As the submission notes, the Development Plan makes reference to grant initiatives such as Historic Structures Fund and Built Heritage Investment Scheme.

The draft Development Plan designates Glaslough as a Tier 4 Village. In recognition of the importance of Tier 4 villages in sustaining the vitality of rural communities, it is an objective of the Development Plan to prepare Tier 4 Village Plans during the lifetime of the Development Plan. It is envisaged that these plans will be delivered on a strategically phased basis following agreement with the Elected Members of Monaghan County Council. In response to the OPR submission, MN-C22-MCDP-126, regarding the timeframes and focus of the village plans, it is recommended that Objective SHO 5 in Chapter 2 and VIO 4 in Chapter 9 are amended along with the inclusion of additional explanatory text in Section 9.15 as set out below.

The Tier 4 Village Plans will provide an overarching strategic framework for each of the villages and will focus on topics including housing, amenity, infrastructure, parking provision as well as sustainable reuse and regeneration. A level of community engagement will be afforded to enable interested parties to become involved in shaping the future of these villages and influence how their communities grow and develop.

Chief Executive Recommendations

Amend Plan Strategic Objective SO 6, as follows:

Plan Strategic Objectives	
SO 6	To protect, nurture <i>and enhance</i> the County’s rich natural resources, heritage, tourism assets and amenities along with the environmental quality of the natural and built environment in both the urban and rural areas.

Amend Tourism Objective TMO 8, as follows:

Tourism Objectives	
TMO 8	To facilitate, where appropriate, the provision of high-quality sustainable tourism products and services within the County <i>where it is of a scale and nature appropriate to its setting,</i> in order to increase the level of activity and the sustainability of the tourism market. In particular the provision of quality hotels and other forms of tourism accommodation, and the development of tourism projects, facilities, activities, and attractions shall be a priority.

It is recommended that Objective SHO5 in Chapter 2, Section 9.15 and Objective VIO 4 are amended as follows:

Villages Objective	
SHO 5	To prepare Tier 4 village plans during the lifetime of this plan, with a focus on housing, amenity, infrastructure, and parking provision <i>transport and the sustainable reuse and regeneration of existing derelict, vacant, or underutilised sites. At least one village plan will be prepared for a village in each of the three Municipal Districts per annum.</i>

It is also recommended that Objective VIO 4 within Section 9.15 in Chapter 9 – Strategic Objectives for Settlements is amended as indicated below:

9.15 Tier 4 Village Plans

In recognition of the importance of Tier 4 villages in sustaining the vitality of rural communities, it is an objective of the Development Plan to prepare Tier 4 Village Plans during the lifetime of the Development Plan. It is envisaged that these plans will be delivered on a strategically phased basis following agreement with the Elected Members of Monaghan County Council. Community engagement will be a key element to enable interested parties to become involved in shaping the future of these villages and influence how their communities grow and develop.

Tier 4 Villages Objectives	
VIO 4	To prepare plans for the Tier 4 villages plans during the lifetime of this plan, which with a focus on housing, amenity, infrastructure, parking provision and traffic calming transport during the lifetime of this plan, subject to available resources. and the sustainable reuse and regeneration of existing derelict, vacant, or underutilised sites. At least one village plan will be prepared for a village in each of the three Municipal Districts per annum.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-113</u>	PJ and EJ Doherty Ltd c/o Genesis Planning Consultants	Edenamo, Inniskeen	90

Summary of Submission & Issues Raised

- The submission requests that the settlement envelope of Inniskeen is amended to include the subject lands.
- The subject lands are currently partly within the settlement envelope of Inniskeen
- The submission states that the subject lands are conveniently located adjacent to the existing public roads, offering direct access to the Regional road network which has adequate capacity for any traffic generated from residential use and is therefore a strategically well-located site within Inniskeen village.
- The submission contends that the inclusion of the subject lands as outlined within the settlement envelope for Inniskeen will be consistent with the linear village form as established and not represent urban sprawl.
- The author states that the lands should be regarded as a parcel of lands which are serviced and represents a logical physical extension of the village. The public footpath is located adjacent to the lands and existing foul sewer and ESB connections are available. As defined in appendix 1 of the National Planning Framework, the lands should be given priority in terms of zoning through the development plan process.
- The submission provides details of previous grants of planning permission pertaining to the site, namely 04/1438, 06/2060, 06/2062, 09/478 and 10/9002.
- A breakdown of the substantial works carried out on the subject lands has been detailed within the submission and includes:
 - completed site clearance works to formation level for each plot; and laying of hardcore finish;
 - Main foul and storm drainage connections completed;
 - Site services within the development commenced;
 - new 250 metre long sewer line installed on the main road (costing €75k). This was completed out of sequence at the request of Monaghan County Council to act as the future connection to serve the subject lands. Submission includes correspondence from Monaghan County Council dated July 2009
- The submission refers to a recent decision from An Bord Pleanála (Ref 313034-22) within which it is contended that the Planning Inspector accepted that the development of the lands was appropriate. Paragraph 7.2.17 of the report refers.
- The submission refers to the National Planning Framework (NPF) which states: “The NPF targets a significant proportion of future urban development on infill/brownfield development sites within the built footprint of existing urban areas. This is applicable to all scales of settlement, from the largest city to the smallest village”.
- Also of note, submission refers to appendix 3 of the NPF which sets out a tiered approach to zoning of lands, namely that serviced lands should be identified and serviceable lands should be identified.
- It is submitted within the submission that the NPF sets out a clear policy direction for strengthening of existing urban areas and a move away from rural based one-off housing. The use of infill/brownfield sites is advocated and the tiered approach to zoning of lands set out and Planning Authorities, through the plan process, should identify ‘serviced lands’ and consider same as a priority.

- In terms of actual lands identified under the Draft CDP 2025-2031 submission notes that the settlement envelope as proposed for Inniskeen fails to take due account of physical constraints and does not identify which lands can actually be developed for housing purposes.
- The submission provides an illustration which outlines why a significant portion of lands within the settlement limit are not developable.
- As per the analysis, the author specifically highlights that a significant area of lands within the settlement envelope lie within the floodplain associated with the Fane River. Specifically, the CFRAM study and flood maps identify a significant area of lands lie within the 10% fluvial AEP floodplain. Submission also notes that given the low-lying nature of the areas identified at risk of flooding within the settlement limit it is reasonable to assume on planning grounds that mitigation cannot be designed into a scheme to allow for building within the 10% AEP fluvial flood plain as identified.
- Having regard to the area of lands which are subject to flooding as well as the lands designed recreation/amenity, the author contends that approximately 4.6 hectares of lands are not appropriate for development purposes within the settlement envelope.
- Additional constraints outlined within the submission concerning lands within the settlement limit include:
 - Glebe House;
 - Church of Ireland and attendant grounds;
 - O'Rourke's Mill and attendant grounds;
 - St Marys Church and attendant grounds;
 - 2no. protected monuments.
- The author therefore contends that the settlement envelope as proposed for Inniskeen does not provide adequate lands for future population growth, housing land requirements or employment generating enterprises.
- Furthermore the submission states that sequential development should not therefore be assessed in isolation but instead considered against the context of both what lands are suitable for development and how to prioritise/direct development onto such lands which are both brownfield and infill.
- The author submits that the development plan process must have regard to the fact that other lands within the village settlement envelope are either:
 - not suitable for development;
 - not brownfield/serviced;
 - not available for development; and
 - not of adequate size to deliver housing in a wholistic way and by a single developer that will be of such socio-economic benefit to the area.
- The submission also notes that only 5 units have been constructed in Inniskeen since 2001, and there are no extant permissions for any other residential units within the settlement limit.
- The author argues that lack of delivery of housing is not sustainable, and it is the role of the Planning process to facilitate delivery of Housing, particularly in a scenario where this land-owner has the commercial capacity to deliver scheme housing for the Village.
- The submission also includes details of pre-planning discussions with the Housing Section of Monaghan County Council, outlining a need for units in the village.
- Whilst the author notes that matters can be determined in relation to phasing, quantum of units and overall site design particulars at planning application stage, it is important at this that the Draft CDP facilitates a settlement boundary for lands that are developable and achieve the wider policy objectives of facilitating Housing Delivery.
- In summary the submission requests that settlement envelope for Inniskeen is revised to include 4.34 hectares of land at Edenamo, Inniskeen.

Chief Executive Response

Submission requests the inclusion of lands within the settlement envelope of Inniskeen.

Inniskeen is defined as a Tier 4 Village within the Draft Development Plan. The Core Strategy of the Development Plan recognises the role of settlements in driving the development of the County and identifies the scope of development possible for the County, while remaining consistent with National and Regional policy. It also identifies the quantum and location of development for the plan period, consistent with the population targets and settlement hierarchy that reflects the availability of existing services, planned investment, sequential development and environmental requirements

The designation of Inniskeen as a Tier 4 Village is an acknowledgement of its importance in sustaining the vitality of its rural community and as such Objective SHO4 of the Draft Development Plan seeks *'To promote and facilitate development that is commensurate with the nature and extent of the existing villages and to support their role as local service centres and locations for housing'*. The development envelope around Inniskeen has been designated to manage the development of the village in a sustainable manner which will provide for appropriate growth as well as ensuring the protection of the village character, setting and function. The settlement envelopes are based on the existing established footprint with the aim of consolidating existing development and promoting the regeneration of existing derelict and/or vacant sites.

The majority of the subject lands are included within the settlement envelope of Inniskeen, with the remaining lands located outside. It is considered that there are sufficient undeveloped lands within the settlement envelope, which can provide for the projected population growth over the plan period. The Core Strategy and population projections set out in the Draft Development Plan set out a modest growth for the towns and villages of County Monaghan. Section 2.6 and the relevant policies and objectives of the Plan provide for measured and sustainable growth of the Tier 4 settlements.

The submission refers to recent planning application 21/278 (ABP reference 313034-22) and notes that the Inspector's Report stated that the proposal was acceptable, albeit not sequentially closest to the village centre. However, the Board did not accept the recommendation to grant permission and ultimately refused the planning application noting the peripheral location of the site in Inniskeen and concluded that the development proposed would not represent a co-ordinated and consolidated pattern of growth.

In recognition of the importance of Tier 4 villages in sustaining the vitality of rural communities, it is an objective of the Draft Development Plan to prepare Tier 4 Village Plans during the lifetime of the Development Plan. It is envisaged that these plans will be delivered on a strategically phased basis following agreement with the Elected Members of Monaghan County Council.

The Tier 4 Village Plans will provide an overarching strategic framework for each of the villages and will focus on topics including housing, amenity, infrastructure, parking provision as well as sustainable reuse and regeneration. A level of community engagement will be afforded to enable interested parties to become involved in shaping the future of these villages and influence how their communities grow and develop.

In response to the OPR submission, MN-C22-MCDP-126, regarding the timeframes and focus of the village plans, it is recommended that Objective SHO 5 in Chapter 2 and VIO 4 in Chapter 9 are amended along with the inclusion of additional explanatory text in Section 9.15 as set out below.

Having regard to the above, it is recommended that there is no change to the settlement envelope of Inniskeen.

Chief Executive Recommendation

It is recommended that Objective SHO5 in Chapter 2 and Section 9.15 and Objective VIO4 in Chapter 9 are amended as follows:

SHO 5: To prepare Tier 4 village plans during the lifetime of this plan, with a focus on housing, amenity, infrastructure, ~~and parking provision~~ **transport and the sustainable reuse and regeneration of existing derelict, vacant, or underutilised sites. At least one village plan will be prepared for a village in each of the three Municipal Districts per annum.**

9.15 Tier 4 Village Plans

~~In recognition of the importance of Tier 4 villages in sustaining the vitality of rural communities, it is an objective of the Development Plan to prepare Tier 4 Village Plans during the lifetime of the Development Plan. It is envisaged that these plans will be delivered on a strategically phased basis following agreement with the Elected Members of Monaghan County Council. Community engagement will be a key element to enable interested parties to become involved in shaping the future of these villages and influence how their communities grow and develop.~~

VIO 4: ~~To prepare plans for the Tier 4 villages~~ **plans during the lifetime of this plan, which with a focus on housing, amenity, infrastructure, parking provision and traffic calming** ~~transport during the lifetime of this plan, subject to available resources.~~ **and the sustainable reuse and regeneration of existing derelict, vacant, or underutilised sites. At least one village plan will be prepared for a village in each of the three Municipal Districts per annum.**

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-119</u>	Gary McCaughey and Patrick Macklin c/o The Planning Partnership	Lands at Drumreask, Ballinode	88

Summary of Submission & Issues Raised

- The overall subject site known as Drumreask Demesne, extends to circa 43.95 ha and is located immediately east of the Ballinode Village settlement/development boundary which is a designated Tier 4 Village in the Draft Monaghan County Development Plan 2025-2031, and approximately 2km northwest of Monaghan Town, thereby benefitting from a strategic location in the mid-north of County Monaghan.
- The submission seeks to facilitate the development potential of the lands to accommodate a tourist and continuing care/nursing home with assisted and independent living units on lands located outside, but within the vicinity of the development limit of Ballinode.
- The submission notes that the Draft Monaghan County Development Plan 2025-2031 outlines support of nursing homes, retirement homes and care facilities in or adjacent to Tier 4 settlements, where the subject site adjoins the settlement/development limit boundary.
- The submission also quotes Section 15.16 of the Draft Plan which supports the development of tourism accommodation and facilities in rural locations are outlined where a clearly identified site-specific tourism need is demonstrated to the satisfaction of the Planning Authority.
- The submission details previous planning history associated with the site, namely planning permission reference 08/578 and Extension of Duration reference 14/9012.
- The submission highlights a number of objectives and policies which the development of the lands would support.
- The submission requests an adjustment of the Ballinode settlement/development limit boundary at its most eastern point, to include the area that resembles the gateway approach to Ballinode, considering the elements of public realm that are arranged at this location. Fundamentally, these components of public realm such as seating, footpaths, village signage and landscaping that comprise the specified area creates a real sense of arrival into Ballinode Village from this direction.
- The submission contends that the extension of the Ballinode village envelop will address any ambiguity that may arise regarding the subject site's proximity to the village, as the subject lands will physically adjoin the settlement envelope of Ballinode.
- The submission also seeks a minor text amendment to section 15.10.7 Nursing Homes, Retirement Homes, Care Facilities, as follows: There is a presumption against permitting nursing homes and care facilities in the rural area. The Planning Authority considers that these services should be located within the designated Tier 1-3 settlements of the County where public utilities are available and opportunities for greater social interaction and inclusion to the community exist. Proposals for nursing homes, retirement homes and care facilities in or adjacent immediate vicinity to Tier 4, 5 and 6 settlements, may be considered acceptable where there is a clearly identified need for the accommodation and a strong justification for the proposed location having regard to available services.
- The submission presents that the lands at Drumreask offer significant opportunity to deliver an appropriate, sustainable and consolidated plan-led development in accordance with local, regional and national policy objectives outlined in their associated plans, which respects and integrates with the existing natural, archaeological and architectural heritage of the site, ensuring its proper and sustainable development.

- The submission notes that the development of tourist and continuing care/nursing home with assisted and independent living units has the potential to provide an integrated and orderly development to serve the Ballinode and surrounding population with a better quality of life, general well-being and sense of community for all ages.

Consideration

The submission requests that the development limit of Ballinode is amended to include a portion of land to the east of the existing development limit as well as amendments to Section 15.10.7 of the Draft Plan.

Ballinode is defined as a Tier 4 Village within the Draft Development Plan. The Core Strategy of the Draft Development Plan recognises the role of settlements in driving the development of the County and identifies the scope of development possible for the County, while remaining consistent with National and Regional policy. It also identifies the quantum and location of development for the plan period, consistent with the population targets and settlement hierarchy that reflects the availability of existing services, planned investment, sequential development and environmental requirements.

The designation of Ballinode as a Tier 4 village is an acknowledgement of its importance in sustaining the vitality of its rural community and as such Objective SHO4 of the Draft Development Plan seeks *‘to promote and facilitate development that is commensurate with the nature and extent of the existing villages and to support their role as local service centres and locations for housing’*. The settlement envelope around Ballinode has been designated to manage the development of the village in a sustainable manner which will provide for appropriate growth as well as ensure the protection of the village character, setting and function. The settlement envelopes are based on the existing established footprint with the aim of consolidating existing development and promoting the regeneration of existing derelict and/or vacant sites.

There are sufficient undeveloped lands within the village envelope, which can provide for the projected population growth over the plan period. The Core Strategy and population projections set out in the Draft Development Plan set out a modest growth for the towns and villages of County Monaghan. It is considered that Section 2.6 and the relevant policies and objectives of the Plan provide for measured and sustainable growth of the Tier 4 settlements. Furthermore, a portion of the subject lands for inclusion within the development limit are located within a flood risk area. As a result, there is no justification for the inclusion of the subject lands within the settlement limit of Ballinode.

In recognition of the importance of Tier 4 Villages in sustaining the vitality of rural communities, it is an objective of the Development Plan to prepare Tier 4 Village Plans during the lifetime of the Development Plan. It is envisaged that these plans will be delivered on a strategically phased basis following agreement with the Elected Members of Monaghan County Council.

The Tier 4 Village Plans will provide an overarching strategic framework for each of the villages and will focus on topics including housing, amenity, infrastructure, parking provision as well as sustainable reuse and regeneration. A level of community engagement will be afforded to enable interested parties to become involved in shaping the future of these villages and influence how their communities grow and develop.

The submission notes that the subject lands could be developed for a range of uses including tourism, continuing care/nursing home and independent living units. The Development Plan recognises that the tourism sector has enormous potential for future growth but notes that the sector must be developed in a sustainable manner that supports integration within communities and optimises the economic benefit for the County. Such developments are not precluded from the rural area, and this

is reflected within the Development Plan which states that the Council shall encourage the provision of tourist accommodation and facilities in appropriate locations where the development is considered necessary to the nature and purpose of the proposed development and where it meets a clearly identified site-specific tourism need.

Additionally, whilst the Development Plan acknowledges that the demand for nursing homes, retirement homes, care facilities and associated services has grown as life expectancy has increased, it recognises that such developments should not be located within rural areas but instead within designated Tier 1-3 settlements. The Development Plan does however note that proposals for nursing homes, retirement homes and care facilities in or adjacent to Tier 4, 5 and 6 settlements, may be considered acceptable where there is a clearly identified need for the accommodation and a strong justification for the proposed location having regard to available services. Whilst it is acknowledged that some Tier 4 settlements would lend themselves suitable for the development of nursing homes, retirement homes, care facilities, by virtue of their size, location and characteristics, not all of the Tier 4 settlements would be considered appropriate for this type of development. Therefore, in the interest of sustainability and to ensure that this type of development is located where public utilities are available and opportunities for greater social integration and inclusion to the community exist, it is considered that the existing policy wording contained within Section 15.10.7 of the Draft Development Plan is retained.

Having regard to the above, it is recommended that there is no change to the settlement envelope of Ballinode.

In response to the OPR submission, MN-C22-MCDP-126, regarding the timeframes and focus of the village plans, it is recommended that Objective SHO 5 in Chapter 2 and VIO 4 in Chapter 9 are amended along with the inclusion of additional explanatory text in Section 9.15 as set out below.

Chief Executive Recommendation

It is recommended that Objective SHO5 in Chapter 2 and Section 9.15 and Objective VIO4 in Chapter 9 are amended as follows:

SHO 5: To prepare Tier 4 village plans during the lifetime of this plan, with a focus on housing, amenity, infrastructure, ~~and parking provision~~ **transport and the sustainable reuse and regeneration of existing derelict, vacant, or underutilised sites. At least one village plan will be prepared for a village in each of the three Municipal Districts per annum.**

9.15 Tier 4 Village Plans

In recognition of the importance of Tier 4 villages in sustaining the vitality of rural communities, it is an objective of the Development Plan to prepare Tier 4 Village Plans during the lifetime of the Development Plan. It is envisaged that these plans will be delivered on a strategically phased basis following agreement with the Elected Members of Monaghan County Council. Community engagement will be a key element to enable interested parties to become involved in shaping the future of these villages and influence how their communities grow and develop.

VIO 4: To prepare ~~plans for the Tier 4 villages~~ **plans during the lifetime of this plan, which** with a focus on housing, amenity, infrastructure, ~~parking provision and traffic calming~~ **transport** ~~during the lifetime of this plan, subject to available resources.~~ **and the sustainable reuse and regeneration of existing derelict, vacant, or underutilised sites. At least one village plan will be prepared for a village in each of the three Municipal Districts per annum.**

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-122</u>	Bernard Duffy and Fergus Cumiskey	Inniskeen	91

Summary of Submission & Issues Raised

- The submission requests that the subject lands are included within the settlement envelope of Inniskeen.
- The submission notes that the existing development envelope limits Inniskeen’s potential for sustainable growth and is stifling the village’s ability to expand and enhance the local amenities envisioned for the area.
- The authors notes that the village faces several infrastructure and safety issues which include:
 - Parking: Insufficient parking, especially for schools and childcare facilities, creates safety concerns during peak times, such as morning and afternoon hours
 - Access: Limited access to local amenities, including St. Daigh's School, local creches, the Patrick Kavanagh Centre, and various local businesses, hinders accessibility and usability.
 - Community Facilities and Amenities: The current plan lacks provisions for expanded civic and community facilities, essential for supporting the village's social and cultural activities.
- Enlarging the settlement envelope would provide the space to enhance:
 - Car and bus parking particularly for schools and community facilities
 - Community infrastructure, such as pedestrian pathways and road improvements.
 - Develop social and civic amenities to enrich community life.
- In summary, the submission states that increasing the settlement envelop is crucial to supporting Inniskeen’s sustained growth as well as improving the infrastructure for its residents.

Chief Executive Response

The submission requests the inclusion of lands within the settlement envelope of Inniskeen.

Inniskeen is defined as a Tier 4 Village within the Draft Development Plan. The Core Strategy of the Development Plan recognises the role of settlements in driving the development of the County and identifies the scope of development possible for the County, while remaining consistent with National and Regional policy. It also identifies the quantum and location of development for the plan period, consistent with the population targets and settlement hierarchy that reflects the availability of existing services, planned investment, sequential development and environmental requirements.

The designation of Inniskeen as a Tier 4 village is an acknowledgement of its importance in sustaining the vitality of its rural community and as such Objective SHO4 of the Draft Development Plan seeks *‘To promote and facilitate development that is commensurate with the nature and extent of the existing villages and to support their role as local service centres and locations for housing’*. The settlement envelope around Inniskeen has been designated to manage the development of the village in a sustainable manner which will provide for appropriate growth as well as ensure the protection of the village character, setting and function. The village settlement envelopes are based on the existing established footprint with the aim of consolidating existing development and promoting the regeneration of existing derelict and/or vacant sites.

It is considered that there are sufficient undeveloped lands within the village envelope, 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. It is considered that Section 2.6 and the relevant policies and objectives of the Plan provide for measured and sustainable growth of the Tier 4 settlements. As a result, there is no justification for the inclusion of the subject lands within the settlement limit of Inniskeen.

Lands are not zoned for specific uses within the village plans in order to provide for a less restrictive approach to the suitable expansion and growth of the villages, however as noted within the submission, Objective VIO3 of the Plan does seek '*To facilitate additional community facilities and services within the village envelope where no other suitable sites are available where possible and on the fringes of the village envelope where no other suitable sites are available*'.

The Draft Development Plan contains within Chapter 15 Development Management Guidelines, car parking spaces requirements, appropriate to the type and location of development proposed. An assessment of development proposals is done on a case-by-case basis through the development management process.

In recognition of the importance of Tier 4 villages in sustaining the vitality of rural communities, it is an objective of the Development Plan to prepare Tier 4 Village Plans during the lifetime of the Development Plan. It is envisaged that these plans will be delivered on a strategically phased basis following agreement with the Elected Members of Monaghan County Council.

The Tier 4 Village Plans will provide an overarching strategic framework for each of the villages and will focus on topics including housing, amenity, infrastructure, parking provision as well as sustainable reuse and regeneration. A level of community engagement will be afforded to enable interested parties to become involved in shaping the future of these villages and influence how their communities grow and develop.

In response to the OPR submission, MN-C22-MCDP-126, regarding the timeframes and focus of the village plans, it is recommended that Objective SHO 5 in Chapter 2 and VIO 4 in Chapter 9 are amended along with the inclusion of additional explanatory text in Section 9.15 as set out below.

Having regard to the above, it is recommended that there is no change to the settlement envelope of Inniskeen.

Chief Executive Recommendation

It is recommended that Objective SHO5 in Chapter 2 and Section 9.15 and Objective VIO4 in Chapter 9 are amended as follows:

SHO 5: To prepare Tier 4 village plans during the lifetime of this plan, with a focus on housing, amenity, infrastructure, ~~and parking provision~~ **transport and the sustainable reuse and regeneration of existing derelict, vacant, or underutilised sites. At least one village plan will be prepared for a village in each of the three Municipal Districts per annum.**

9.15 Tier 4 Village Plans

In recognition of the importance of Tier 4 villages in sustaining the vitality of rural communities, it is an objective of the Development Plan to prepare Tier 4 Village Plans during the lifetime of the Development Plan. It is envisaged that these plans will be delivered on a strategically phased basis following agreement with the Elected Members of Monaghan County Council. Community engagement will be a key element to enable interested parties to become involved in shaping the future of these villages and influence how their communities grow and develop.

VIO 4: To prepare plans for the Tier 4 villages ~~plans during the lifetime of this plan, which~~ with a focus on housing, amenity, infrastructure, parking provision and traffic calming ~~transport during the lifetime of this plan, subject to available resources.~~ and the sustainable reuse and regeneration of existing derelict, vacant, or underutilised sites. At least one village plan will be prepared for a village in each of the three Municipal Districts per annum.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-127</u>	Glaslough Village Green Management Company Limited By Guarantee	Glaslough Village, Co. Monaghan.	N/A

Summary of Submission & Issues Raised

This submission provides comment on pedestrian safety and infrastructure within the village of Glaslough and proposes improvements to active travel and the expansion of walking, cycling and running paths.

1. Proposal for Pedestrian Safety and Infrastructure Improvement

Active travel - increase of Walk/Run/Cycle Paths

- The submission notes that these paths will provide residents and visitors alike with accessible areas for physical activity, contributing to better mental and physical health for the community. Creating interconnected, safe routes throughout the village would support more active and sustainable lifestyles.
- The submission notes that no safe cycle routes or walking paths exist that do not cross over or are on busy rural road with no shoulders or markings.

Improving Pedestrian Safety by Removing Overhead Wires and Poles

- Reference is made to the path from the pottery studio to the village shop, where utility poles currently obstruct walkways, creating safety hazards and affecting the village's overall appearance.
- The submission suggests relocating overhead wires underground where possible to enhance safety and improve aesthetic appeal. Removing these obstructions will make the village more walkable and accessible for all, including those with limited mobility.

2. Traffic Calming and Parking Management – Glaslough Village

Objective:

- To ensure a safe, accessible, and pedestrian-friendly environment in Glaslough by implementing effective traffic calming measures and increasing parking capacity for residents and visitors. These efforts aim to enhance the village's appeal as a welcoming and safe place, while reducing traffic congestion and preserving its tranquil rural character.

Strategies and Policies:

1. Traffic Calming Measures

The submission proposes to introduce traffic calming features on main routes through Glaslough to manage vehicle speeds and improve safety for pedestrians and cyclists. Measures may include:

- Speed bumps, raised crosswalks, and rumble strips in high-traffic zones.
- Reduced speed limits in the village core, particularly near schools, residential areas, and community spaces.
- Clearly marked pedestrian crossings and designated walkways to encourage safe pedestrian movement.

2. Parking Solutions for Residents and Visitors

Increase parking availability through the creation of well-designed, unobtrusive parking areas that serve both residents and visitors. Proposed solutions include:

- Expanding existing parking lots and creating new designated spaces near the village center, parks, and popular visitor sites.

- Introducing resident-only parking zones in specific areas to prioritise local access.
- Exploring opportunities for overflow parking facilities on the village outskirts, with clear signage and safe walkways leading into the village.

3. Seasonal and Event-Based Parking Plans

Develop flexible parking strategies for peak tourist seasons and special events, which bring increased traffic to Glaslough. These could involve temporary parking zones, shuttle services from designated lots, or partnerships with local businesses to manage visitor parking without impacting residential areas.

4. Pedestrian and Cyclist Priority Zones

Establish pedestrian and cyclist priority areas, particularly around Glaslough's central amenities, to support a safe and enjoyable experience for non-motorized traffic. Pathway improvements and bicycle racks will encourage walking and cycling as primary modes of transport within the village.

5. Public Awareness and Community Engagement

Engage with Glaslough residents and stakeholders to raise awareness around new traffic and parking measures, ensuring community feedback shapes any adjustments. An annual review of these measures will be conducted to address emerging needs and community suggestions.

The Monaghan County Council's commitment to traffic calming and enhanced parking options will not only improve road safety but also strengthen Glaslough's accessibility and livability. These measures, in combination with the landscape preservation policies, will help maintain the village's peaceful atmosphere, making it a safe, convenient, and welcoming place for residents and visitors alike.

3. Community Spaces and Accessibility

Enhancing Public Spaces for Community Enjoyment

- Development of Viewing and Community Areas

The submissions proposes enhancing and introducing spaces that allow residents and visitors to view the natural beauty and heritage of the village, particularly with views of Glaslough Lake. Creating accessible viewing areas that celebrate both natural and heritage elements can enrich community pride and support the visitor experience.

Chief Executive Response

The draft Development Plan designates Glaslough as a Tier 4 Village. In recognition of the importance of Tier 4 villages in sustaining the vitality of rural communities, it is an objective of the Development Plan to prepare Tier 4 Village Plans during the lifetime of the Development Plan. It is envisaged that these plans will be delivered on a strategically phased basis following agreement with the Elected Members of Monaghan County Council. In response to the OPR submission, MN-C22-MCDP-126, regarding the timeframes and focus of the village plans, it is recommended that Objective SHO 5 in Chapter 2 and VIO 4 in Chapter 9 are amended along with the inclusion of additional explanatory text in Section 9.15 as set out below.

The Tier 4 Village Plans will provide an overarching strategic framework for each of the villages and will focus on topics including housing, amenity, infrastructure, parking provision as well as sustainable reuse and regeneration. A level of community engagement will be afforded to enable interested parties to become involved in shaping the future of these villages and influence how their communities grow and develop.

This submission requests active travel, public realm, traffic calming and parking upgrades to Glaslough village. It is considered that subject to funding and resources, the draft CDP makes provision to implement such projects through policies Urban Area Road Policies UARP 2, UARP 3 And Active Travel and Recreational Walking and Cycling Policies ATP 1- ATP 13.

Some of the comments made in the submission are outside of the remit of the County Development Plan, i.e. resident only parking zone and seasonal and event-based parking zones.

Chief Executive Recommendation

It is recommended that Objective SHO5 in Chapter 2, Section 9.15 and Objective Vio 4 in Chapter 9 are amended as follows:

Villages Objective	
SHO 5	To prepare Tier 4 village plans during the lifetime of this plan, with a focus on housing, amenity, infrastructure, and parking provision transport and the sustainable reuse and regeneration of existing derelict, vacant, or underutilised sites. At least one village plan will be prepared for a village in each of the three Municipal Districts per annum.

It is also recommended that Objective VIO 4 within Section 9.15 in Chapter 9 – Strategic Objectives for Settlements is amended as indicated below:

9.15 Tier 4 Village Plans

In recognition of the importance of Tier 4 villages in sustaining the vitality of rural communities, it is an objective of the Development Plan to prepare Tier 4 Village Plans during the lifetime of the Development Plan. It is envisaged that these plans will be delivered on a strategically phased basis following agreement with the Elected Members of Monaghan County Council. Community engagement will be a key element to enable interested parties to become involved in shaping the future of these villages and influence how their communities grow and develop.

Tier 4 Villages Objectives	
VIO 4	To prepare plans for the Tier 4 villages plans during the lifetime of this plan, which with a focus on housing, amenity, infrastructure, parking provision and traffic calming transport during the lifetime of this plan, subject to available resources. and the sustainable reuse and regeneration of existing derelict, vacant, or underutilised sites. At least one village plan will be prepared for a village in each of the three Municipal Districts per annum.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-129</u>	Glaslough Village Green Management Company Limited By Guarantee	Glaslough Village, Co. Monaghan.	N/A

Summary of Submission & Issues Raised

This submission relates to landscape preservation and protection in Glaslough Village and its surrounds.

The community of Glaslough envisions a future that honours and protects its scenic landscape, unique heritage, and natural beauty. This plan aims to preserve the village's character and environment for future generations, ensuring sustainable development that complements the local landscape:

Landscape Conservation Zones

Designate specific areas within and around Glaslough as Landscape Conservation Zones where significant natural or scenic value is identified. These zones will restrict developments and guide permissible activities to those that align with landscape preservation.

Tree and Vegetation Protection

Implement policies for tree and vegetation protection to maintain the ecological health and aesthetic quality of the village. Any development proposals must include plans to preserve existing mature trees, hedgerows, and other natural features that define Glaslough's rural landscape.

Sustainable Development Standards

Require that all new developments meet sustainable and low-impact design standards. These include limits on building height and massing, appropriate material use that harmonizes with the natural setting, and landscaping practices that support native flora and fauna.

Preservation of Historical Landmarks and Views

Identify and protect historical landmarks, heritage buildings, and important viewpoints. Development proposals should respect these elements by maintaining sightlines, visual integrity, and appropriate buffers around Glaslough's historical assets.

Community Involvement in Landscape Planning

Foster community involvement in landscape planning decisions to ensure that future changes align with local values. This will include public consultation sessions, a feedback process, and the creation of a community-led landscape advisory committee.

Environmental Impact Assessment for Development

Require comprehensive environmental impact assessments for any proposed developments that may alter Glaslough's natural environment. These assessments will evaluate potential impacts on biodiversity, water quality, and landscape views, and outline mitigation strategies where necessary.

The submission notes that by prioritizing the preservation of Glaslough's natural and historic landscape, Monaghan County Council commits to protecting the village's character while allowing for sustainable, mindful development. The council will work closely with residents, developers, and other stakeholders to uphold these values and ensure Glaslough remains a place of beauty, heritage, and ecological richness.

Chief Executive Response

The draft Development Plan designates Glaslough as a Tier 4 Village. In recognition of the importance of Tier 4 villages in sustaining the vitality of rural communities, it is an objective of the Development Plan to prepare Tier 4 Village Plans during the lifetime of the Development Plan. It is envisaged that these plans will be delivered on a strategically phased basis following agreement with the Elected Members of Monaghan County Council. In response to the OPR submission, MN-C22-MCDP-126, regarding the timeframes and focus of the village plans, it is recommended that Objective SHO 5 in Chapter 2 and VIO 4 in Chapter 9 are amended along with the inclusion of additional explanatory text in Section 9.15 as set out below.

The Tier 4 Village Plans will provide an overarching strategic framework for each of the villages and will focus on topics including housing, amenity, infrastructure, parking provision as well as sustainable reuse and regeneration. A level of community engagement will be afforded to enable interested parties to become involved in shaping the future of these villages and influence how their communities grow and develop.

The comments in relation to tree and vegetation protection are noted. The County Development Plan acknowledges the contribution of tree, hedgerows and woodlands as reflected in Policies TWP 1 and TWP 2.

The comments made in relation to sustainable development standards are also noted. Proposals within Architectural Conservation Areas (ACAs) shall comply with the Architectural Conservation Areas Objectives & Policies as set out within Chapter 6 of the development plan, in addition to relevant policies and objective set out in Chapter 15 Development Management Standards.

Glaslough Village is designated as an Architectural Conservation Area (ACA) and submission requests an extension of the ACA boundary. It is an objective of the development plan (ACO 1) is “to carry out a comprehensive review of the Architectural Conservation Areas within the County during the lifetime of this Plan”. This objective has been amended as per response O9(ii) of the response to the OPR Submission, MN-C22-MCDP-126. The review of Glaslough ACA affords the opportunity to identify and protect further historical landmarks and heritage buildings within Glaslough. Furthermore, the objectives and policies contained within the draft Development Plan are considered to afford sufficient protection of the historic landmarks and buildings.

The suggestion of a community-led landscape advisory committee is outside of the remit of the County Development Plan. Whether a development requires an Environmental Impact Assessment to be conducted is determined by legislative requirements as set out in EIA Directive.

Chief Executive Recommendation

It is recommended that Objective SHO5 in Chapter 2, Section 9.15 and Objective VIO 4 in Chapter 9 are amended as follows:

Villages Objective	
SHO 5	To prepare Tier 4 village plans during the lifetime of this plan, with a focus on housing, amenity, infrastructure, and parking provision transport and the sustainable reuse and regeneration of existing derelict, vacant, or underutilised sites. At least one village plan will be prepared for a village in each of the three Municipal Districts per annum.

It is also recommended that Objective VIO 4 within Section 9.15 in Chapter 9 – Strategic Objectives for Settlements is amended as indicated below:

9.15 Tier 4 Village Plans

In recognition of the importance of Tier 4 villages in sustaining the vitality of rural communities, it is an objective of the Development Plan to prepare Tier 4 Village Plans during the lifetime of the Development Plan. It is envisaged that these plans will be delivered on a strategically phased basis following agreement with the Elected Members of Monaghan County Council. Community engagement will be a key element to enable interested parties to become involved in shaping the future of these villages and influence how their communities grow and develop.

Tier 4 Villages Objectives	
VIO 4	To prepare plans for the Tier 4 villages plans during the lifetime of this plan, which with a focus on housing, amenity, infrastructure, parking provision and traffic calming transport during the lifetime of this plan, subject to available resources. and the sustainable reuse and regeneration of existing derelict, vacant, or underutilised sites. At least one village plan will be prepared for a village in each of the three Municipal Districts per annum.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-133</u>	McCaffrey Family c/o Craftstudio Architecture	Emyvale	89

Summary of Submission & Issues Raised

- Subject lands are accessible solely from within the urban area. The village boundary narrows to encompass the L11602 local road to the south before widening to include established residential developments to the west.
- The L11602 local road, lying within the town boundary, is an attractive thoroughfare equipped with a public footpath and street lighting on one side, and it has adequate capacity to accommodate increased traffic flow.
- The lands benefit from scenic views of the Mountain Water River, a distinctive natural feature of Emyvale. The L11602 area is characterized by a mix of detached homes and a semi-detached residential estate, Mill Race, which directly borders the western edge of the subject lands. To the north Oriel Park residential estate and additional agricultural lands are located, while to the east, the Scarna Court neighbourhood provides additional residential context and is accessible from Emyvale’s Main Street.
- The topography of the site slopes from the southern boundary, a gradient that has proven feasible for residential development, as shown by existing housing in the area and elsewhere in the village. Given the site’s integration with surrounding residential zones and its capacity for infrastructure support, it presents a compelling opportunity for further development aligned with Emyvale’s growth objectives.
- The subject lands are ideally positioned, located within 190 metres of Emyvale Main Street. This proximity improves accessibility to key services, amenities, and job opportunities making it easier for residents to walk, bike, or take public transport and reducing reliance on private vehicles. Nearby services and amenities include:
 - Emyvale Main Street (shops /restaurants / pubs etc.) – 190 metres / 3 minutes on foot
 - Emyvale Primary Care Centre – 250 metres / 3 minutes on foot
 - Emyvale Cycling Club – 300 metres / 5 minutes on foot
- Sequential zoning and careful town boundary planning are essential components of eco-friendly urban development, as they help reduce carbon emissions by limiting long commutes and vehicle dependency. By limiting development at the urban fringe, sequential zoning also plays a vital role in preserving natural habitats, agricultural lands, and green spaces.
- The submission notes that the subject lands, nearly encircled by residential developments, are among the last available tracts in Emyvale capable of supporting infill housing. Presently, these lands interrupt the urban pattern along the L11602 local road, creating a visible gap in the streetscape that appears unkempt and overgrown.
- The author states that incorporating these lands within the urban boundary would enable strategic developing of this area that would fill this visual and functional void, enhancing both the continuity and aesthetic appeal of the area. It would also adhere to the principles of sequential development, supporting compact and sustainable growth while making efficient use of nearby infrastructure. This approach would improve local connectivity, provide cohesion to the community’s layout, and advance Emyvale’s goals for sustainable, eco-conscious development.
- The submission states that Emyvale's existing housing stock exhibits three primary themes:
 - Historic Main Street: Housing along Main Street predominantly features historic residences and modern infill dwellings, with some accommodation located above commercial premises, reflecting the village’s traditional core. Providing additional housing within this area represents the most sustainable approach to development, however there are very few opportunities left to do so.

- Eastern Urban Sprawl: To the east, individual detached homes on large plots have developed along main artery routes, illustrating a pattern of urban sprawl extending into the countryside.
- Dense Residential Estates: West of Main Street, several established residential estates—such as Mill Race, Oriel Park, Lake View, and Scarna Court—represent denser residential development. These estates reflect a more compact, community-oriented housing approach within the village.
- The submission states that the draft Monaghan County Development Plan proposes an urban boundary for Emyvale to direct future growth within a controlled area. The submission notes that only four potential sites are available for multi-unit housing development and each present significant challenges.
- The Monaghan County Development Plan 2025-2031 anticipates a population increase of 75 people in Emyvale, bringing the population to an estimated 713 by 2031—a projected growth of 11.7% based on 2022 figures.
- While Emyvale is well-positioned for commuting and offers local employment opportunities, its housing shortage presents a major barrier to attracting and retaining younger generations, which is essential for reaching the predicted population growth.
- Given the constraints outlined above, the identified sites within the proposed urban boundary face considerable limitations in accommodating multi-unit housing to meet predicted demand. Consequently, alternative sites or innovative approaches, such as rezoning appropriate land for compact infill development, will need to be considered to meet Emyvale's housing needs sustainably while adhering to the principles outlined in the development plan.
- Objective 3a of the framework specifically sets a goal to "deliver at least 40% of all homes nationally within the built-up footprint of existing urban settlements." This target reflects a commitment to sustainable growth that prioritizes compact, efficient land use while reducing urban sprawl. Developing within established areas not only enhances urban vitality but also conserves resources and strengthens community cohesion.
- The National Planning Framework 2040 emphasizes the need for development within urban areas to maximize the use of underutilized land, particularly through infill and brownfield sites, as well as publicly owned land. By focusing on these areas, the framework aims to support higher densities of housing and employment, improve accessibility to services, and make better use of existing facilities and public transport networks.
- Author notes that the inclusion of the subject lands within the urban boundary, would support national goals for urban density and sustainability, making effective use of an already serviced, well-located site within the urban fabric.
- Chapter 2.7 of the Draft CDP reflects the regeneration of Existing Lands *'It is therefore important to acknowledge that a proportion of future urban development will occur on infill/brownfield/regeneration lands within the built envelope of existing settlements. In order to encourage this type of development within the urban centres, a relaxation of some development management standards will be considered where appropriate'*. Whilst the current draft boundary map does not include the subject lands in the urban area, author suggest that they are already very much part of the existing settlement as a result of being only accessible from the town and enveloped by existing residential development.
- The submission concludes as follows:
 - The current draft of the County Development Plan identifies the subject lands part of the rural area. If the urban boundary of Emyvale were amended to incorporate the subject lands, they would serve as an ideal location for infill housing ensuring seamless integration with the established community. Furthermore, their proximity to the village core offers convenient access to essential services and amenities, supporting a walkable and connected lifestyle for future residents.

- Including the lands within the urban boundary would embody the principles of compact and sustainable development, allowing Emyvale to grow in a way that maximises the use of existing infrastructure while preserving the rural character of the surrounding landscape. This strategic expansion would effectively address housing demand, reduce pressure on outlying greenfield areas, and enhance the village's overall connectivity and vitality.
- The submission requests that the Planning Authority redesignate the subject lands, outlined in this submission, as being within the urban boundary of Emyvale. This designation will support the development of these strategically located lands to meet current and future housing needs in a sustainable, well-coordinated manner consistent with national and local planning objectives.

Chief Executive Response

Submission requests the inclusion of lands within the settlement envelope of Emyvale.

Emyvale is defined as a Tier 4 Village within the Draft Development Plan. The Core Strategy of the Development Plan recognises the role of settlements in driving the development of the County and identifies the scope of development possible for the County, while remaining consistent with National and Regional policy. It also identifies the quantum and location of development for the plan period, consistent with the population targets and settlement hierarchy that reflects the availability of existing services, planned investment, sequential development and environmental requirements.

The designation of Emyvale as a Tier 4 village is an acknowledgement of its importance in sustaining the vitality of its rural community and as such Objective SHO4 of the Draft Development Plan seeks '*To promote and facilitate development that is commensurate with the nature and extent of the existing villages and to support their role as local service centres and locations for housing*'. The settlement envelope around Emyvale has been designated to manage the development of the village in a sustainable manner which will provide for appropriate growth as well as ensure the protection of the village character, setting and function. The village settlement envelopes are based on the existing established footprint with the aim of consolidating existing development and promoting the regeneration of existing derelict and/or vacant sites.

It is considered there are sufficient undeveloped lands within the village envelope, which can provide for the projected population growth over the plan period. The Core Strategy and population projections set out in the Draft Development Plan set out a modest growth for the towns and villages of County Monaghan and any increase in these projections is considered unjustified. It is considered that Section 2.6 and the relevant policies and objectives of the Plan provide for measured and sustainable growth of the Tier 4 settlements. As a result, there is no justification for the inclusion of the subject lands within the settlement limit of Emyvale.

In recognition of the importance of Tier 4 villages in sustaining the vitality of rural communities, it is an objective of the Development Plan to prepare Tier 4 Village Plans during the lifetime of the Development Plan. It is envisaged that these plans will be delivered on a strategically phased basis following agreement with the Elected Members of Monaghan County Council.

The Tier 4 Village Plans will provide an overarching strategic framework for each of the villages and will focus on topics including housing, amenity, infrastructure, parking provision as well as sustainable reuse and regeneration. A level of community engagement will be afforded to enable interested parties to become involved in shaping the future of these villages and influence how their communities grow and develop.

In response to the OPR submission, MN-C22-MCDP-126, regarding the timeframes and focus of the village plans, it is recommended that Objective SHO 5 in Chapter 2 and VIO 4 in Chapter 9 are amended along with the inclusion of additional explanatory text in Section 9.15 as set out below.

Having regard to the above, it is recommended that there is no change to the settlement envelope of Emyvale.

Chief Executive Recommendation

It is recommended that Objective SHO5 in Chapter 2 and Section 9.15 and Objective VIO4 in Chapter 9 are amended as follows:

SHO 5: To prepare Tier 4 village plans during the lifetime of this plan, with a focus on housing, amenity, infrastructure, ~~and parking provision~~ **transport and the sustainable reuse and regeneration of existing derelict, vacant, or underutilised sites. At least one village plan will be prepared for a village in each of the three Municipal Districts per annum.**

9.15 Tier 4 Village Plans

In recognition of the importance of Tier 4 villages in sustaining the vitality of rural communities, it is an objective of the Development Plan to prepare Tier 4 Village Plans during the lifetime of the Development Plan. It is envisaged that these plans will be delivered on a strategically phased basis following agreement with the Elected Members of Monaghan County Council. Community engagement will be a key element to enable interested parties to become involved in shaping the future of these villages and influence how their communities grow and develop.

VIO 4: To prepare ~~plans for the Tier 4 villages~~ **plans during the lifetime of this plan, which** with a focus on housing, amenity, infrastructure, ~~parking provision and traffic calming~~ **transport during the lifetime of this plan, subject to available resources.** **and the sustainable reuse and regeneration of existing derelict, vacant, or underutilised sites. At least one village plan will be prepared for a village in each of the three Municipal Districts per annum.**

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-146</u>	Margaret Keenan c/o McNamee Chartered Building Surveyors Ltd	Lands at Smithborough	95

Summary of Submission & Issues Raised

The submission requests the inclusion of lands within the Settlement Envelope of Smithborough.

Location

- The lands are located in the centre of the Village of Smithborough
- The lands are located with existing street frontage to the N54
- The lands are very accessible with significant street frontage and that allows access to the lands at the rear
- There is immediate access to the local road networks all with existing footpaths, public lighting, public transport etc.
- Request to include the lands to the rear of the property within the Development Boundary Limit
- The current Development Boundary steps in from the adjoining property to the east and then step out again on adjoining property to the west
- At minimum the Development Boundary should be continuous in a line
- The landowner owns the entirety of property (folio No. MN23472F)
- A new planning application is to be submitted within next few days for demolition of existing dwelling and re-development of this location
- The lands requested to be re-zoned to the rear are in effect a green field site.

Infrastructure and Services

- The site is in an area where there is adequate existing services including foul sewerage, water supply, road infrastructure with footpaths, public lighting, public transport via Bus Routes and cable communications
- There is adequate site area for all stormwater to be treated on site
- There is existing connectivity between the site and Monaghan Town via a public road network.

Existing Zoned Lands near fully developed

- The adjoining lands to the east and west are now fully developed so there are no other available service lands in this location
- The adjoining lands have been granted permissions for development under planning references 031007, 9929, 06472, 98251 and 07559 to name just a few adjacent.

Schools

- There are several schools within a close range including Scoil Mhuire, Magherarney, Smithborough and Latnamard Primary School in Smithborough which is a 10 minute walk from the lands.
- The Secondary Schools in Monaghan Town including St. Louis, Monaghan Collegiate School and Coláiste Oiriall are with existing bus and regional road connections .

Compact Growth

- The lands adjacent to the east and west have been fully developed.
- The lands requested to be re-zoned are infill between them
- These lands are now the only accessible piece left in this location for development as Residential

- The term “25 minute city” is used by various authorities to describe compact neighbourhoods with an array of local services and amenities and access to public transport all within a short walk or cycle from homes. This should be the objective when planning for sustainable residential development and compact settlements. Planning authorities at settlement level should plan for an integrated network of well designed neighbourhoods that can meet day to day needs such as food, health care, education, sports and professional services. The lands in question meet this requirement within Smithborough Village Centre with proximity to Monaghan Town and in addition existing shops, businesses etc in proximity along the N54. It is submitted that the subject land offers excellent scope for intensification and compact growth, along with alignment of new development with sustainable transport to deliver sustainable development.

The need for Housing and Population Growth

- It is a well-publicised fact in the national media that there is a National Housing crisis due to a shortage of housing. The current spatial strategy for this region identifies that Monaghan and surrounding villages are regional growth centres.
- There has been considerable population growth in Co. Monaghan in the last few years with the speed of growth much higher than anticipated or projected. The Census results show that Monaghan's population increased by 3,446 people to 64,832 from 2016 – 2022. Monaghan is projected to have a population of 76,698 inhabitants by the year 2050.
- Local Villages such as Smithborough have a very important role to play in Co. Monaghan and general region in meeting the population growth, therefore the development potential of these well located, serviced, connected, available for construction and economically viable lands provides a significant opportunity that should be encouraged to provide for residential development to meet population growth.
- Monaghan Co. Development Plan 2025-2031 gives significant priority to Monaghan and surrounding villages as a growth centres in respect of population, housing and employment growth and it is evident that Monaghan Co. Council are committed to ensuring that they can meet the housing demand that will be generated by the increase in population. In this regard this submission is on the basis that the lands in question can support this commitment in providing much need housing to meet population growth.
- The lands are located between two existing residential developments including The Meadows to the west and Mulladuff OPD'S to the east and is effectively an infill site. There are no other potential development lands with direct access. There are only existing residential areas already built on. The subject land is considered as significant under-utilised land in the centre of Smithborough ideally located for residential infill development. Land uses to the east and West and North are primarily residential in nature. The inclusion of these lands within the development boundary would therefore help meet the shortfall in Zoned lands. It is submitted that the Zoning of these lands as residential can support the commitment to achieving the above objectives. At present the rate of construction of housing units is well below the demand. This land are green field, serviced and with existing connectivity to Monaghan, therefore any construction could begin without delay.

Flood Risk

- An extract from the OPW mapping which clearly identifies that the lands are not subject to flooding
- The OPW/RPS CFRAM maps show no risk of flooding.
- The lands are in the area marked with a dot in red on submitted map and not within a flood zone.

Conclusion

- It is demonstrated why the inclusion of the subject lands to be within the development boundary limit should be given serious consideration as part of the New Plan.

Chief Executive Response

The submission requests the inclusion of lands within the settlement envelope of Smithborough, a Tier 4 Village as per Core Strategy of Draft Monaghan County Development Plan 2025-2031.

The Core Strategy of the Development Plan recognises the role of settlements in driving the development of the County and identifies the scope of development possible for the County, while remaining consistent with National and Regional policy. It also identifies the quantum and location of development for the plan period, consistent with the population targets and settlement hierarchy that reflects the availability of existing services, planned investment, sequential development and environmental requirements.

The designation of Smithborough as a Tier 4 village is an acknowledgement of its importance in sustaining the vitality of its rural community and as such Objective SHO4 of the Draft Development Plan seeks *“To promote and facilitate development that is commensurate with the nature and extent of the existing villages and to support their role as local service centres and locations for housing”*.

The settlement envelope around Smithborough has been designated to manage the development of the village in a sustainable manner which will provide for appropriate growth as well as ensuring the protection of the village character, setting and function. The settlement envelopes are based on the existing established footprint with the aim of consolidating existing development and promoting the regeneration of existing derelict and/or vacant sites.

There are sufficient undeveloped lands within the village envelope, which can provide for the projected population growth over the plan period. The Core Strategy and population projections set out in the Draft Development Plan set out a modest growth for the towns and villages of County Monaghan. It is considered that Section 2.6 of the Draft Development Plan and the relevant policies and objectives therein provide for measured and sustainable growth of the Tier 4 settlements.

In recognition of the importance of Tier 4 villages in sustaining the vitality of rural communities, it is an objective of the Development Plan to prepare Tier 4 Village Plans during the lifetime of the Development Plan. It is envisaged that these plans will be delivered on a strategically phased basis following agreement with the Elected Members of Monaghan County Council.

The Tier 4 Village Plans will provide an overarching strategic framework for each of the villages and will focus on topics including housing, amenity, infrastructure, transport as well as sustainable reuse and regeneration of existing derelict, vacant, or underutilised sites. A level of community engagement will be afforded to enable interested parties to become involved in shaping the future of these villages and influence how their communities grow and develop.

In response to the OPR submission, MN-C22-MCDP-126, regarding the timeframes and focus of the village plans, it is recommended that Objective SHO 5 in Chapter 2 and VIO 4 in Chapter 9 are amended along with the inclusion of additional explanatory text in Section 9.15 as set out below.

Based on the above, the inclusion of lands within the settlement envelope of Smithborough is not recommended.

Chief Executive Recommendations

It is recommended that Objective SHO5 in Chapter 2 and Section 9.15 and Objective VIO4 in Chapter 9 are amended as follows:

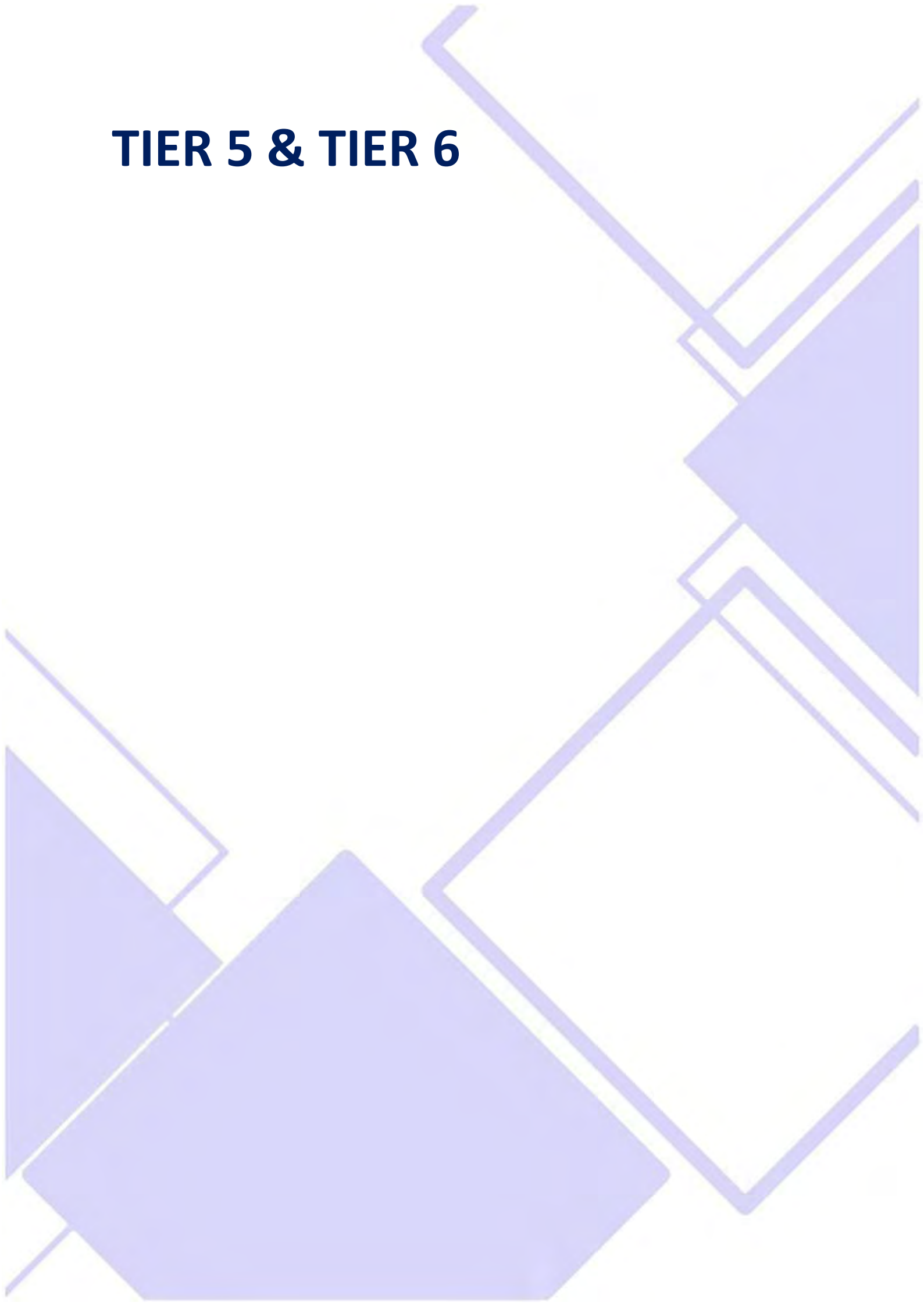
SHO 5: To prepare Tier 4 village plans during the lifetime of this plan, with a focus on housing, amenity, infrastructure, ~~and parking provision~~ **transport and the sustainable reuse and regeneration of existing derelict, vacant, or underutilised sites. At least one village plan will be prepared for a village in each of the three Municipal Districts per annum.**

9.15 Tier 4 Village Plans

In recognition of the importance of Tier 4 villages in sustaining the vitality of rural communities, it is an objective of the Development Plan to prepare Tier 4 Village Plans during the lifetime of the Development Plan. It is envisaged that these plans will be delivered on a strategically phased basis following agreement with the Elected Members of Monaghan County Council. Community engagement will be a key element to enable interested parties to become involved in shaping the future of these villages and influence how their communities grow and develop.

VIO 4: To prepare ~~plans for the Tier 4 villages~~ **plans during the lifetime of this plan, which** with a focus on housing, amenity, infrastructure, ~~parking provision and traffic calming~~ **transport during the lifetime of this plan, subject to available resources.** **and the sustainable reuse and regeneration of existing derelict, vacant, or underutilised sites. At least one village plan will be prepared for a village in each of the three Municipal Districts per annum.**

TIER 5 & TIER 6



Submissions relating to Tier 5 & Tier 6 Villages			
Submission Reference	Name/Organisation	Location of Subject Lands	Page No.
<u>MN-C22-MCDP-51</u>	Laura Hughes	Tyholland	518
<u>MN-C22-MCDP-52</u>	Pauline Treanor	Carrickroe	519
<u>MN-C22-MCDP-72</u>	Billy McQuaid on behalf of Tyholland Community Development	Tyholland	520
<u>MN-C22-MCDP-105</u>	Michael Fisher	Tydavnet	522
<u>MN-C22-MCDP-124</u>	Thady Kelly	Annayalla	524

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-51</u>	Laura Hughes	Lands at Tyholland	98

Summary of Submission & Issues Raised

The submission requests the inclusion of lands in Tyholland to be zoned Residential.

Chief Executive Response

The Core Strategy of the Draft Monaghan County Development Plan 2025-2031 recognises the role of settlements in driving the development of the County and identifies the scope of development possible for the County, while remaining consistent with National and Regional policy. It also identifies the quantum and location of development for the plan period, consistent with the population targets and settlement hierarchy that reflects the availability of existing services, planned investment, sequential development and environmental requirements. The relevant policies and objectives of the Plan provide for measured and sustainable growth of the Tier 5 and Tier 6 settlements.

The lands are located in Tyholland, a Tier 6 “Dispersed Rural Community” in the Core Strategy of the Development Plan. Tier 6 Settlements do not have a defined settlement envelope. In addition, lands are not zoned for specific uses within the settlements that have a defined settlement envelope. Residential development within Tier 6 settlements will be considered where the developer has provided evidence to the satisfaction of the Council.

The submission lands are located onto the National Primary Road N12 which has a speed limit of 80km/h at this location. Based on the information submitted, the lands would require a new access from the N12. A proposed new access would not comply with the policy document ‘Spatial Planning and National Roads – Guidelines for Planning Authorities, January 2012’, published by the Department of the Environment, Community and Local Government, therefore an alternative access point would be required.

In addition, the site is located within Flood Zone A and shown as a significant flow path and area of floodplain by National Indicative Fluvial Mapping (NIFM).

Based on the above, there is no justification for the inclusion or zoning of said lands for residential development within this plan period.

Chief Executive Recommendation

No amendment recommended.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-52</u>	Pauline Treanor	Lands at Drumbriston, Carrickroe	97

Summary of Submission & Issues Raised

The submission requests the inclusion of lands in Drumbriston, Carrickroe and to be zoned (purpose not stated)

Chief Executive Response

The Core Strategy of the Development Plan recognises the role of settlements in driving the development of the County and identifies the scope of development possible for the County, while remaining consistent with National and Regional policy. It also identifies the quantum and location of development for the plan period, consistent with the population targets and settlement hierarchy that reflects the availability of existing services, planned investment, sequential development and environmental requirements. The relevant policies and objectives of the Plan provide for measured and sustainable growth of the Tier 5 and Tier 6 settlements.

The lands are located at Drumbriston in Carrickroe, a Tier 5 “Rural Community Settlement” in the Draft Core Strategy. Tier 5 Settlements do not have a defined settlement envelope. In addition, lands are not zoned for specific uses within the settlements that have a defined settlement envelope. Residential development within Tier 5 settlements will be considered where the developer has provided evidence to the satisfaction of the Council.

Based on Carrickroe being identified as a Tier 5 settlement, there is no justification for the inclusion or zoning of said lands for development within this plan period.

Chief Executive Recommendation

No amendment recommended

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-72</u>	Billy McQuaid c/o Tyholland Community Development	Tyholland	99

Summary of Submission & Issues Raised

The submission requests the upgrade of Tyholland parish to Tier 5 or Tier 4.

Development

- No housing development in the parish for the last 40 years
- New housing would encourage families to settle in the community
- Fear of losing school numbers, teachers etc

Employment

- Proximity of Tyholland to many large employers
- New homes in the parish would help sustain and encourage employment, enable local businesses and expand and boost the local economy and enrich quality of life
- Letters of support from schools and local businesses, GAA club submitted

Land at Kildonagh and Leitrim is prime development land

- Subject land is the heart and future of the parish development
- Site had direct access to the sewerage pumping station, access to the N12 and access to the Old Armagh Road
- Access from the N12 is not allowed

Location

- Kildonagh Lands are located 3miles from Monaghan with all its amenities
- Proposed a footpath for residents to safely access the bust Local Link service

Planning Permission

- N12 is not a viable option which could hinder the development opportunity
- Proposal has suggested an alternative entrance
- Access onto the N12 has been obtained previously and is often used by HGV trucks and fridges

Chief Executive Response

It is requested to include lands at Kildonagh and Leitrim, Tyholland as a Tier 4 or Tier 5 settlement. Tyholland is located 3 miles from Monaghan Town.

The Core Strategy of the Development Plan recognises the role of settlements in driving the development of the County and identifies the scope of development possible for the County, while remaining consistent with National and Regional policy. It also identifies the quantum and location of development for the plan period, consistent with the population targets and settlement hierarchy that reflects the availability of existing services, planned investment, sequential development and environmental requirements. The relevant policies and objectives of the Plan provide for measured and sustainable growth of the Tier 5 and Tier 6 settlements.

The lands are located in Tyholland, a Tier 6 “Dispersed Rural Community” in the Draft Core Strategy. Tier 6 Settlements do not have a defined settlement envelope. In addition, lands are not zoned for specific uses within the settlements that have a defined settlement envelope. Residential development within Tier 6 settlements will be considered where the developer has provided evidence to the satisfaction of the Council.

The submission lands are located onto the National Primary Road N12 which has a speed limit of 80km/h at this location. The submission shows that the lands would be accessed via a local road. If a

new access was proposed at this location on the N12, it would not comply with the policy document 'Spatial Planning and National Roads – Guidelines for Planning Authorities, January 2012', published by the Department of the Environment, Community and Local Government.

Based on the above, there is no justification for the inclusion or zoning of said lands for residential development within this plan period.

Chief Executive Recommendation

No amendment recommended.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-105</u>	Michael Fisher	Tydavnet	N/A

Summary of Submission & Issues Raised

- Author refers to a previous submission which requested the district electoral areas of Tydavnet and Killylough should be grouped together because of their interconnection along the Monaghan to Clogher Road.
- The submission queries the designation of Tydavnet as a Tier 5 settlement and states that the Council should be focusing on developing a plan for Tydavnet which, along with Killylough, has a combined population of around 2,000 which should mean Tydavnet is included as a Tier 4 settlement (like Ballinode and Scotstown) or a Tier 3 settlement (like Emyvale).
- Childcare was one of the main facilities requested by local residents in a survey carried out by the SmartVillage participants and this should be built into any plan.
- Attention must be paid to placing Tydavnet firmly on the map as indicated in road signs and not just rely on the townland which contains the old spelling of Tedavnet (not to be confused with the Tydavnet/Killylough catchment area).
- The potential to expand the twinning link with Geel in Belgium should also be explored as well as the development of a St Dymphna Trail.
- There was a considerable effort put in by Cavan County Council in association with the local community to bring the relics of St Killian to Mullagh in October. An interpretative centre also exists in that village telling the story of the Saint. Tydavnet could do the same and this would boost tourism.
- Connections in the North Monaghan area with the leading Irish author William Carleton (hedge school at Glennan) should be further explored and developed maybe through walking trails connecting to the Clogher Valley.
- The submission states that there is limited content in the development plan regarding literary tourism and states that too much concentration is given to Patrick Kavanagh.

Chief Executive Response

Tydavnet is designated as a Tier 5 Rural Community Settlement, and although it does not have a defined settlement envelope, development in such settlements is supported and encouraged at a scale which is appropriate to the character of the settlement. This designation is laid out in the Core Strategy which informs the spatial development of the County over the plan period having regard to population figures, demographic trends, household sizes, etc. Population targets have therefore been allocated accordingly for each Tier of the Settlement Hierarchy.

The comments made in relation to the provision of childcare facilities in Tydavnet are noted. The Draft Development Plan recognises that childcare facilities are an essential element of the economic and social wellbeing of our population and notes that as a result of the rural nature of the population of County Monaghan, consideration will be given to established rural communities and the creation of private childcare provision which meets the criterion of Policy CFP3 which seeks *'To facilitate and support, where a need is identified, in cooperation with the Monaghan County Childcare Committee, the provision of childcare facilities in appropriate locations, and where possible within towns and villages and/or adjacent to existing community facilities to facilitate localised provision, accessibility and sustainable development'*.

The Draft Development Plan recognises both the economic and social advantages the tourism sector can bring the County. As such the Draft Plan contains a comprehensive suite of objectives and policies to promote and enhance tourism in the County, including policies to promote and support the County's twinning partnerships as well as the development of linked tourist trails which showcase the

wealth of natural, historical and cultural heritage of the County and contribute towards its unique identity and quality of life.

The Kavanagh County: A Literary Landscape Character Assessment and Management Plan was prepared in 2012 and as such is referenced within the Draft Plan. However, the Development Plan also recognises that in addition to its natural assets, the County also offers an array of cultural and creative experiences and notes that the Council is committed to working with other relevant statutory bodies, businesses, community groups and individuals to develop a clear and sustainable approach necessary to successfully showcase the County on the widest stage possible through the promotion and facilitation of sustainable tourism development.

Chief Executive Recommendation

No amendment recommended.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-124</u>	Thady Kelly c/o Peter Culleton	Annayalla	96

Summary of Submission & Issues Raised

- The submission requests the inclusion of the lands within the development envelope of Annayalla.
- The submission notes that the lands adjoin an existing small scale housing development “Drumakelly” and are within easy reach of existing services such as water and public sewerage.
- The lands are also serviced by way of a recently constructed footpath lining them to the remainder of the village.

Chief Executive Response

The submission requests the inclusion of lands within the settlement envelope of Annayalla.

Annayalla is defined as a Tier 4 Village within the Draft Development Plan. The Core Strategy of the Development Plan recognises the role of settlements in driving the development of the County and identifies the scope of development possible for the County, while remaining consistent with National and Regional policy. It also identifies the quantum and location of development for the plan period, consistent with the population targets and settlement hierarchy that reflects the availability of existing services, planned investment, sequential development and environmental requirements

The designation of Annayalla as a Tier 4 village is an acknowledgement of its importance in sustaining the vitality of its rural community and as such Objective SHO4 of the Draft Development Plan seeks ‘*To promote and facilitate development that is commensurate with the nature and extent of the existing villages and to support their role as local service centres and locations for housing*’. The development envelope around Annayalla has been designated to manage the development of the village in a sustainable manner which will provide for appropriate growth as well as ensure the protection of the village character, setting and function. The village development envelopes are based on the existing established footprint with the aim of consolidating existing development and promoting the regeneration of existing derelict and/or vacant sites.

It is considered that there are sufficient undeveloped lands within the village envelope, 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. It is considered that Section 2.6 and the relevant policies and objectives of the Plan provide for measured and sustainable growth of the Tier 4 settlements. As a result, there is no justification for the inclusion of the subject lands within the settlement limit of Annayalla.

In recognition of the importance of Tier 4 villages in sustaining the vitality of rural communities, it is an objective of the Development Plan to prepare Tier 4 Village Plans during the lifetime of the Development Plan. It is envisaged that these plans will be delivered on a strategically phased basis following agreement with the Elected Members of Monaghan County Council.

The Tier 4 Village Plans will provide an overarching strategic framework for each of the villages and will focus on topics including housing, amenity, infrastructure, parking provision as well as sustainable reuse and regeneration. A level of community engagement will be afforded to enable interested parties to become involved in shaping the future of these villages and influence how their communities grow and develop.

In response to the OPR submission, MN-C22-MCDP-126, regarding the timeframes and focus of the village plans, it is recommended that Objective SHO 5 in Chapter 2 and VIO 4 in Chapter 9 are amended along with the inclusion of additional explanatory text in Section 9.15 as set out below.

Having regard to the above, it is recommended that there is no change to the settlement envelope of Annayalla.

Chief Executive Recommendation

It is recommended that Objective SHO5 in Chapter 2 and Section 9.15 and Objective VIO4 in Chapter 9 are amended as follows:

SHO 5: To prepare Tier 4 village plans during the lifetime of this plan, with a focus on housing, amenity, infrastructure, ~~and parking provision~~ **transport and the sustainable reuse and regeneration of existing derelict, vacant, or underutilised sites. At least one village plan will be prepared for a village in each of the three Municipal Districts per annum.**

9.15 Tier 4 Village Plans

In recognition of the importance of Tier 4 villages in sustaining the vitality of rural communities, it is an objective of the Development Plan to prepare Tier 4 Village Plans during the lifetime of the Development Plan. It is envisaged that these plans will be delivered on a strategically phased basis following agreement with the Elected Members of Monaghan County Council. Community engagement will be a key element to enable interested parties to become involved in shaping the future of these villages and influence how their communities grow and develop.

VIO 4: To prepare ~~plans for the Tier 4 villages~~ **plans during the lifetime of this plan, which** with a focus on housing, amenity, infrastructure, ~~parking provision and traffic calming~~ **transport during the lifetime of this plan, subject to available resources.** **and the sustainable reuse and regeneration of existing derelict, vacant, or underutilised sites. At least one village plan will be prepared for a village in each of the three Municipal Districts per annum.**

PART 6

GENERAL SUBMISSIONS



General Submissions		
Submission Reference	Name/Organisation	Page No
<u>MN-C22-MCDP-18</u>	Barry Dolan	527
<u>MN-C22-MCDP-21</u>	Carol Lambe	529
<u>MN-C22-MCDP-31</u>	An Post	531
<u>MN-C22-MCDP-32</u>	Vantage Ireland Ltd	536
<u>MN-C22-MCDP-59</u>	Jerome Savage	538
<u>MN-C22-MCDP-60</u>	Safe Ireland	541
<u>MN-C22-MCDP-62</u>	Anne Walker Summers	543
<u>MN-C22-MCDP-76</u>	Saint Gobain Mining (Ireland) Ltd	546
<u>MN-C22-MCDP-79</u>	Age Friendly Ireland	549
<u>MN-C22-MCDP-88</u>	Kevin V. & Claire Mulligan	554
<u>MN-C22-MCDP-90</u>	Keep Ireland Open	555
<u>MN-C22-MCDP-92</u>	Energia	559
<u>MN-C22-MCDP-101</u>	Heritage Officer	563
<u>MN-C22-MCDP-110</u>	EDF Renewables Ireland Ltd	565
<u>MN-C22-MCDP-114</u>	Conroy Gold and Natural Resources PLC	569
<u>MN-C22-MCDP-117</u>	Local Link Cavan Monaghan	571
<u>MN-C22-MCDP-118</u>	Roadstone Limited	574
<u>MN-C22-MCDP-123</u>	Stream Bioenergy Ireland Limited	576
<u>MN-C22-MCDP-138</u>	Rose Deery Wacks	591
<u>MN-C22-MCDP-140</u>	Monaghan IFA	594
<u>MN-C22-MCDP-141</u>	Noel McGuigan	598
<u>MN-C22-MCDP-150</u>	David O'Rourke	602

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-18</u>	Blayne Academy c/o Barry Dolan	N/A	N/A

Summary of Submission & Issues Raised

- The submission raises concerns regarding the lack of sports facilities available in the County, particularly for female sporting teams.
- The submission highlights the need for a ‘Peace Link’ style recreational facility in the Monaghan/Mid Monaghan area and states that venues which should be considered for such a facility include Rossmore Park, Beech Hill School or The Convent grounds in Monaghan town.

Chief Executive Response

Section 5.5 of the Draft Monaghan County Development Plan recognises the importance of sport and physical recreation in everyday life and notes the vital role it has in promoting wellbeing. The Draft Plan supports the provision of additional sporting facilities at suitable locations throughout the County and this is reflected within Objective CFO6 which seeks *‘to promote the assessment, provision, improvement and expansion of sports facilities within the County, subject to normal planning criteria and the proper planning and sustainable development of the County’* and Objective REO4 which also supports *‘the development of social, recreational, sporting and community facilities in appropriate locations’*.

Lands have been zoned for Recreation and Amenity uses within the 5 main towns of the County. The principal permitted use for said lands is for passive and active recreation, as well as ancillary related uses such as recreational buildings or car parks. Developments which comply with this zoning objective are generally permitted subject to compliance with the relevant policies, standards and requirements contained within the Development Plan. In addition, having regard to Table 9.3 ‘Land Use Zoning Matrix’ it is noted that recreational facilities/sports club developments are ‘open for consideration’ on all zoned lands within the 5 main County Towns. Developments which are considered ‘open for consideration’ are those which by reason of their nature and scale would not be in conflict with the primary zoning objective for the area and would be in the interest of the proper planning and sustainable development of the area.

As a result of the extent of zoned lands which would facilitate the provision of sporting facilities, it is considered unnecessary to identify lands specifically for sports facilities.

The submission also details several potential venues where the provision of a ‘Peace Link’ facility could be located within the Monaghan/Mid Monaghan area.

Rossmore Park: Rossmore Park is located outside the settlement envelope of Monaghan Town and as such is not zoned for a particular use. Additionally, the Park is designated as an Area of Secondary Amenity Value to ensure it is protected from inappropriate and insensitive development. Consequently, only compatible amenity developments which do not unduly impact on the visual amenity of the area would be permitted as reflected in Policy SAP1 of the Development Plan which states *‘To limit development in Areas of Secondary Amenity Value and to only permit compatible amenity developments where they do not unduly impact on visual amenity’*.

Beech Hill School: The Beech Hill School site is zoned as ‘Community Services/Facilities’ within the Draft Development Plan and as such, the principle of developing recreational/sports club facilities as well as playing fields at this location is ‘open for consideration’.

The Convent grounds, Monaghan Town: As above, a portion of the Convent grounds is zoned as 'Community Services/Facilities' within the Draft Development Plan and as such, the principle of developing recreational facilities/sports club as well as playing fields is 'open for consideration'.

Chief Executive Recommendation

No amendment recommended.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-21</u>	Carol Lambe	Lands at Inniskeen and the surrounding area	N/A

Summary of Submission & Issues Raised

- In 2012 Inniskeen Enterprise Development Group commissioned an audit of all the remaining sites which feature in Patrick Kavanagh's work, assessing their condition and advising on their conservation.
- This Landscape Character Assessment report provided a framework for creating a national park which offered protection to the sites immortalised by Kavanagh.
- Since 2012, Kavanagh Country has changed in ways which are regrettable.
- The boarding house that Kavanagh's grandfather lived in has been removed, the field opposite Kavanagh's house, 'Cassidy's Hanging Hill', now sports a red bricked bungalow. The Kavanagh's homeplace, has removed hedges which gave shape to the haggard at the front of the house - the haggard was a feature of traditional Irish farmhouses, and Kavanagh's haggard featured often in his work. Following sensitive restoration, Billy Brennan's Barn is now in jeopardy, the former tree-lined lane has recently been removed. Across the road from Billy Brennan's is the hill of Shancoduff, with its 'triangular field under the fort at Rocksavage'. Kavanagh speaks about using the hedges of this little farm as a library for stashing books.
- The road that links Billy Brennans Barn around the back of Rocksavage Fort to Kednaminsa Cross had no houses on it in the 1990's. Today there are 4 or 5 huge mansions along that road, completely ruining the character of a very rural area.
- The request is for Monaghan County Council to create a National Literary Park, similar to the national parks in the UK, where development is possible but strictly controlled and must be in character with the vernacular of 1920's-1940's rural Ireland.
- There are opportunities within this framework for economic development if the area preserves what is unique about it. If it continues its present course, pressure for more housing will erode the character of what is a beautiful village, but more importantly will wipe out a unique and special literary legacy which cannot be replaced nor replicated.

Chief Executive Response

The Kavanagh County remains a vital cultural, heritage and tourism asset to County Monaghan. This is reflected in the Draft CDP 2025-2031. Section 6.4.1 of the Draft CDP which is headed Kavanagh Country, and it states, 'Kavanagh County: A Literary Landscape Character Assessment and Management Plan was prepared in 2012 and includes a site inventory which represents the sites referred to in his work and ones that present the most intact physical evidence of the places that appear in the literature. The aim of the plan is to guide development and protect access to Kavanagh Country. It is considered that, where appropriate, regard to any relevant recommendations contained within the plan should be had when assessing proposals for development located within Kavanagh Country'. This acknowledges the importance of the surrounding landscape context of Kavanagh Country.

The Landscape Character Assessment was undertaken in 2012 and is due for review. As such it is recommended that an updated Landscape Character Assessment is undertaken which will have regard to the Kavanagh County, and that this undertaken in conjunction with the Renewable Energy Strategy.

Additionally, in recognition of the importance of Tier 4 villages in sustaining the vitality of rural communities, it is an objective of the Development Plan to prepare Tier 4 Village Plans during the lifetime of the Development Plan. It is envisaged that these plans will be delivered on a strategically phased basis following agreement with the Elected Members of Monaghan County Council.

The Tier 4 Village Plans will provide an overarching strategic framework for each of the villages and will focus on topics including housing, amenity, infrastructure, parking provision as well as sustainable reuse and regeneration. A level of community engagement will be afforded to enable interested parties to become involved in shaping the future of these villages and influence how their communities grow and develop.

In response to the OPR submission on timeframes and focus of village plans, it is recommended that Objective SHO 5 in Chapter 2 and VIO 4 in Chapter 9 be amended as set out below.

Chief Executive Recommendations

It is recommended at Chapter 6 Heritage, Conservation and Landscape, Section 6.4 titled Landscape Character Assessment, be amended to include a further objective as follows:

Landscape Character Assessment Objective	
LCO 5	To review and update the Landscape Character Assessment in tandem with the preparation of the Renewable Energy Strategy for the County.

It is recommended that Objective SHO 5 within Section 2.6.4 in Chapter 2 – Core Strategy is amended as indicated below:

Villages Objective	
SHO 5	To prepare Tier 4 village plans during the lifetime of this plan, with a focus on housing, amenity, infrastructure, and parking provision transport and the sustainable reuse and regeneration of existing derelict, vacant, or underutilised sites. At least one village plan will be prepared for a village in each of the three Municipal Districts per annum.

It is also recommended that Objective VIO 4 within Section 9.15 in Chapter 9 – Strategic Objectives for Settlements is amended as indicated below:

In recognition of the importance of Tier 4 villages in sustaining the vitality of rural communities, it is an objective of the Development Plan to prepare Tier 4 Village Plans during the lifetime of the Development Plan. It is envisaged that these plans will be delivered on a strategically phased basis following agreement with the Elected Members of Monaghan County Council. Community engagement will be a key element to enable interested parties to become involved in shaping the future of these villages and influence how their communities grow and develop.

Tier 4 Villages Objectives	
VIO 4	To prepare plans for the Tier 4 villages plans during the lifetime of this plan, which with a focus on housing, amenity, infrastructure, parking provision and traffic calming transport during the lifetime of this plan, subject to available resources. and the sustainable reuse and regeneration of existing derelict, vacant, or underutilised sites. At least one village plan will be prepared for a village in each of the three Municipal Districts per annum.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-31</u>	An Post c/o RMLA Planning Consultants	N/A	N/A

Summary of Submission & Issues Raised

This is a general submission that requests:

- Include a specific land use classification for postal facilities ‘A building which facilitates mail services that can include the processing, sortation and distribution of mail.’
*Note: This use can be assessed on a case by case basis appropriate to site context and all other relevant policies, objectives and standards set out in this Plan.
- Flexible Zoning Objectives: That a ‘Postal Facilities’ land use is considered as ‘Permitted in Principle’ or ‘Open for Consideration’ across all zoning objectives in the County Development Plan, and any associated Local Area Plan within the County.
- Supporting Specific Policies
- Local Transport Plans
- Car Parking
- Delivery and Access
- Engagement with An Post

Introduction

It is requested that the Local Authority carefully consider this submission in the preparation of the Monaghan County Development Plan 2025-2031 and accommodate future engagement with An Post. An Post, as a semi state body, is committed to the objectives of Project Ireland 2040 and the NPF, which seeks to guide the sustainable development of Ireland’s primary settlements over the next number of decades.

Background

An Post, operates two distinctive businesses in an increasingly digital environment:

- An Post e-Commerce (Mails & Parcels): providing world class national and international mails and e-commerce parcel logistics services; and
- An Post Customer (Retail): providing a growing range of Financial Services in an omni-channel environment, including Ireland’s largest retail network of c. 950 Post Offices.
 - An Post is currently undertaking detailed assessments of its existing facilities nationwide and considering a programme of works to ensure these facilities are best in class while also seeking new sites capable of accommodating modern delivery operations to serve new and expanding catchment areas.
 - The Draft CDP sets out the overall development strategy and planning policy objectives for the County for the coming years. The County Development Plan will support economic growth, education services and community-related development in line with proper planning and sustainable development principles. The CDP’s policy objectives, guidance and standards have been informed by best practice, national and regional planning guidance.
 - In light of the above, this submission is being made to set out An Post’s current and future requirements to adequately serve expanding catchment areas and to request that Monaghan County Council provide a supportive policy framework for the future provision of postal infrastructure. An Post would be happy to engage with Monaghan County Council, as part of its future assessment of postal facilities across the County.
 - It is considered that the enhancement of An Post’s facilities and the future provision of new facilities could generate employment in Towns across the County, increasing economic development; reinvigorate redundant and underutilised lands; and support climate change mitigation with the transition to e-vehicles in An Post’s fleet.

Operational and Supportive Requirements

- As set out above, An Post is currently assessing their existing facilities and lands within their ownership to devise a nationwide programme of development that will enhance their capability of providing a robust and reliable public service
- In this regard, An Post are seeking to engage with Local Authorities to ensure this future development can be undertaken in a sustainable and efficient manner that benefits local areas and accords with local and national planning policy.

County Monaghan

- An Post own and/or operate a number of postal services within County Monaghan including An Post Retail and An Post Mails and Parcel Distribution facilities in Monaghan Town, Carrickmacross and Castleblayney.
- As part of their overall consolidation and optimisation strategy, An Post may consider the expansion and consolidation of their existing sites in order to ensure the ability to continue to meet the operational needs of an expanding population and a growing market
- Additionally, the potential to redevelop sites which are no longer fit for purpose and the potential to acquire adjoining lands to facilitate expansion or to relocate to new sites that are considered better suited to meet the operational requirements of An Post will be explored to ensure that An Post can continue to meet the operational needs of an expanding population and a growing market.

Flexible Zoning Objectives

- In relation to An Post's existing and future facilities and operational requirements, it is considered that Monaghan County Council should provide flexibility under their strategic land use zonings and objectives. It is important that appropriate zoning objectives are included as part of the County Development Plan, and any Local Area Plan, to allow for the enhancement of existing facilities and the development of new postal infrastructure
- Both An Post Customer (Retail) and An Post e-Commerce (Mails & Parcels distribution/logistics) operations are a necessity in urban locations in order to effectively provide an essential public service, and it is submitted that these uses can, and do, work within tight urban constraints and amongst a variety of other land uses.
- It is therefore requested that Monaghan County Council include a specific land use classification for postal facilities in the Monaghan County Development Plan 2025-2031 and the associated Local Area Plans for County Settlements as outlined below:
- Postal Facilities: *A building which facilitates mail services that can include the processing, sortation and distribution of mail.* *Note: This use can be assessed on a case by case basis appropriate to site context and all other relevant policies, objectives and standards set out in this Plan.*
- It is also requested that a 'Postal Facilities' land use is considered as 'Permitted in Principle' or 'Open for Consideration' across all zoning objectives in the County Development Plan, and any associated Local Area Plan within the County.

Providing clarity in relation to the above would greatly assist An Post in their ambition to ensure that their current sites or any potential new sites in the County are considered appropriate from a planning perspective and are capable of facilitating postal infrastructure that will enable An Post to provide a highly efficient postal service that can cope with modern requirements. The inclusion of policy objectives, which provide a supportive policy framework that can assist An Post in ensuring their ability to continue to meet the operational needs of an expanding population and a growing market, is encouraged for the Monaghan County Development Plan 2025-2031.

Supportive Policies

It is considered important that during the finalisation of the County Development Plan and any associated Local Area Plans or Masterplans, Monaghan County Council carefully consider the existing and future operational requirements of An Post and include appropriate policies to support An Post's ambition to enhance postal facilities in the County. We would request that Monaghan County Council include supportive policies to facilitate enhanced postal services in the County over the 6-year Development Plan period.

Policies, such as the below would assist greatly in the delivery of future An Post projects in the County:

"To support An Post in the provision of new postal facilities and the enhancement of existing facilities, including operational requirements, in the County."

"To facilitate the provision of postal infrastructure at suitable locations in the County."

"To promote the integration of appropriate postal facilities, including both post offices and processing, sortation and distribution facilities, within new and existing communities that are appropriate to the size and scale of each settlement."

The inclusion of policy objectives such as the above would provide a supportive policy framework that could assist An Post as they invest in the mails and parcels infrastructure in the County over the next decade.

It also requested that the Local Authority recognise the specific operational requirements of An Post with regards the operation of post offices and mail sorting offices. These facilities are central to the operation of a reliable public postal service and their long-term viability should be protected. Specific requirements, which will be set out below, primarily relate to car parking, access and deliveries.

Additional Policy Objectives

An Post also supports the following policy objectives included in the Draft CDP which aim to support the establishment and expansion of industrial, commercial or such activities that will provide increased employment opportunities:

- IEO 1: *To ensure that sufficient and suitable land is reserved for new industrial development at appropriate locations, where there are existing infrastructural facilities, services and good communications, or where they can be provided at a reasonable cost.*
- IEO 2: *To facilitate the growth and/or expansion of existing industrial enterprises where appropriate, subject to the Development Management Standards in Chapter 15, of the Monaghan County Development Plan 2025-2031. Such developments should not unduly impact on the residential amenity of existing residential properties.*
- IEO 3: *To encourage and promote the sustainable development of industry within the towns over the plan period.*
- MPO 6: *Promote Monaghan as the key industrial and employment centre in line with its County Town Status.*
- CBO 2: *To promote Castleblayney as a key industrial, enterprise and employment centre.*
- CMO 5: *To promote Carrickmacross as the key industrial, enterprise and employment centre in the south of the County.*

Local Transport Plans

The Draft CDP notes Local Transport Plans are to be prepared for Monaghan Town and Carrickmacross, along with a Sustainable Mobility Plan to be prepared for Castleblayney. An Post is supportive of the making of these plans and requests that the Local Authority recognise the need to facilitate HGV movements and all other operational requirements associated with the postal service throughout the planning, construction and operational phases of any works/ new transport initiatives. It is further requested that full collaboration and discussions are held with An Post prior to and during any such construction and implementation works.

Local Action Area Plan

An Post currently have a facility in Castleblayney that is located within the designated area for a Local Action Area Plan. The Draft CDP states that Local Area Action Plans will be developed to establish strategic planning principles for each identified area including land use, infrastructure provision, layout, open spaces, linkages and design in line with objective SSO 10:

- SSO 10: *To prepare, as resources permit, specific local area action plans and/or masterplans for the towns to provide for the most efficient and suitable coordinated development to take place.*

It is requested that in the preparation of the Local Action Plan, the Local Authority, similar to any Local Transport Plans, have regard to and recognise the importance of HGV movements and all other operational requirements associated with the postal service and it is requested that full collaboration and discussions are held with An Post during the preparation of the Local Action Plan.

Deliveries & Access

Regarding accessibility, it is important that the specific requirements regarding access and deliveries to postal facilities, including post boxes and collection points located in town centre areas are recognised. Access is typically required to premises on a 24-hour basis, although early morning deliveries and late evening collections are of particular importance to ensure mail can be delivered onward to catchment areas in a timely manner.

In this regard, it is imperative that, in order to protect the smooth operation of the existing postal service across the County, any restrictions on the times of deliveries/collections to/from An Post facilities as well as customer access are protected at all collection points including retail offices, Delivery Service Units and post boxes as this could have a serious impact on the ability of An Post to meet the postal needs of the public and agreed service legal agreements with the State. We request that the Local Authority recognise this requirement as part of the Monaghan County Development Plan 2025–2031 and in the future assessment and preparation of planning policy.

Additionally, it is requested that Monaghan County Council engage with An Post should any future area plan or project propose to amend delivery hours in town centre locations. An Post is committed to working with the Local Authority and local residents in minimising potential disturbances to adjacent properties and in providing emission free deliveries in town/city centres.

Further to the above, it is important that a sufficient level of vehicular access is maintained, and that sufficient loading bay space is provided to accommodate the collection and delivery of mail and to accommodate customers who require use of a vehicle to visit an An Post facility. We would request that during the preparation of any future public realm and movement strategies, Monaghan County Council consult with An Post to ensure sustainable solutions are considered to maintain a sufficient level of access whilst also improving the appearance and function of town centre areas for the public.

Car Parking

An Post requires use of c.3,000 vehicles on a daily basis to transport mail within and between settlements throughout the Country. Due to the increasing number of larger parcels being processed, it is considered likely that this requirement will increase over time and as such, An Post facilities may require greater levels of parking spaces, including electric vehicle charging points, as a steady transition is made to the use of environmentally sustainable vehicles. It is important to note, however, that car parking spaces are not only required for An Post delivery vehicles but also for vehicles used by staff that typically travel to An Post facilities by private car and customers collecting mail items.

As outlined above, older postal facilities have been adapting to the increased volumes of mails and parcels and changing operational requirements. In this regard, older facilities face challenges regarding additional space and car parking requirements. In addition, as shifts typically start early in the morning, at times when public transport is not in operation, staff generally travel by private car. As such, these facilities generally require areas of car parking for staff, as well parking storage areas for the delivery vehicles used to transport mail. Moreover, as An Post transition to the use of

environmentally sustainable vehicles, appropriate parking facilities are required to support same, with one EV parking station required per vehicle. This requirement is relatively specific to An Post and is of particular importance given that An Post operates an essential public service. In this regard, any relevant parking standards in the new CDP should only apply to visitor and staff parking associated with An Post postal facilities, while the storage of all other vehicles used for the operation of the Irish postal service should not be included within parking standards.

It is, therefore, requested that Monaghan County Council provide flexibility with car parking standards for postal facilities which, as demonstrated above, require sufficient car parking spaces to operate in an efficient manner. It is also important to note that postal facilities may require a greater quantum of car parking areas going forward as postal trends continue to evolve, making it imperative that facilities are future proofed to ensure the long-term viability of An Post's operations.

Engagement with An Post

As mentioned previously, the efficient operation of postal facilities is central to the successful provision of postal services for businesses and personal customers across the area. It is imperative that access for deliveries/collections are protected and will not be impacted or restricted in any way, at all postal facilities in order to protect the operations of the service.

An Post welcomes and supports the undertaking of public realm works within Town Centres. However, it is requested that the Local Authority carefully consider the operational requirements of An Post at all stages of the development process for any public realm works and it is further requested that full collaboration and discussions are held with An Post prior to and during any such works.

It is requested that the Local Authority have regard for HGV movements and all other operational requirements associated with the postal service throughout both the construction and operational phases of any works.

Conclusion

Our client welcomes the publication of the Draft Monaghan County Development Plan 2025-2031 and the opportunity to comment on the future development of the Town. As outlined previously, An Post own and operate postal facilities in the County and are continually aiming to enhance their capability of providing a robust and reliable public service.

Chief Executive Response

An Post own and/or operate a number of postal services within County Monaghan including An Post Retail and An Post Mails and Parcel Distribution facilities in Monaghan Town, Carrickmacross and Castleblayney. An Post, operates An Post e-Commerce (Mails & Parcels) and An Post Customer (Retail) in 950 Post Offices.

Monaghan County Council supports An Post and its mail services that includes the processing, sortation and distribution of mail.

The Council will accommodate future engagement with An Post in the preparation of Local Transport Plans, Local Action Area Plans, car and HGV parking, storage areas for mail and consider An Post services under the context of the Zoning Objectives and Zoning Matrix of the Draft Plan.

The Council will support the expansion, consolidation of their existing sites, relocation to new sites in accordance with the objectives and policies of the Development Plan.

Chief Executive Recommendations

No amendment recommended.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-32</u>	Vantage Towers c/o Charterhouse Infrastructure Consultants	N/A	N/A

Summary of Submission & Issues Raised

- Vantage Towers are a leading European tower company whose operations include the ownership and management of 1300 telecommunications towers. These towers provide multi-operator network coverage across the Republic of Ireland, their importance is significant in terms of enabling connectivity, in helping Irelands attractiveness as a place to live and work, economic development etc.
- Elements of the telecoms policy within the Draft Monaghan County Development Plan 2025-2031 are potentially damaging for future telecommunications rollout across Monaghan County and run contrary to the objectives of Ireland’s Digital Connectivity Strategy and for that reason request that they be modified or deleted.

Policies which cause concern are as follows:

1. TCO 4 – *To support and encourage engagement between telecommunication providers and local residents, prior to the installation of telecommunications infrastructure, and*
 2. Section 15.9 Development Management Standards – G. *Any application for telecommunication (sic) should be accompanied with a communication strategy, this should indicate how the proposal has been discussed with relevant stakeholders such as the local community.*
- Policy TCO 4 encourages engagement between telecommunications operators and residents prior to the installation of telecommunication infrastructure. The words ‘*support*’ and ‘*encourage*’ given their normal meaning indicates that local engagement is not a pre-condition to make a planning application, nor should it be.
 - The policy wording is unclear on whether this engagement should happen before planning permission has been applied for, or before construction commences. If it requires local engagement before the planning application is made, this is problematic.
 - It would introduce a new layer of procedure which will be difficult for telecommunication applicants to enact.
 - For example, who would the tower developer reach out to, does it need to engage with nearby residents, if so, within what radius of proposed site, and what happens if local residents object to the proposal.
 - Section 15.19 of the Development Management Standards, Point G, takes matters a step further by directing the applicant to submit a communication strategy, showing how the proposal has been discussed with relevant stakeholders in the community prior to the making of the application.
 - Point G should be deleted, it introduces a process which is difficult to satisfy, and it introduces a layer of work that is hard to quantify.
 - Along with local residents, what other stakeholders are considered relevant and how does one contain the list of stakeholders?
 - The above-mentioned policies are opposed as both are unworkable in practice, and at odds with Ireland’s Digital Connectivity Strategy. Under this strategy, all populated areas will be covered by 5G by 2030.
 - These policies are not contained within any Department Circular or Section 28 Guidance Documents and both policies are at odds with Ireland’s Digital Connectivity Strategy.

- Believe that the planning authority has over stepped national policy in placing poorly thought through and contradictory policies within its draft development plan which will potentially give rise to legal challenge in due course.
- Request that both policies listed be removed from the Draft Monaghan County Council Development Plan.

Chief Executive Consideration

It should be noted that the submission has mis referenced two of the Draft County Development Plan objectives and policies. Comments made in relation to Telecommunications Objective TCO 4, actually relate to TCO 5. Similarly, the submission reference to Section 15.9 of the Development Management standards, should actually be Section 15.19 Telecommunications Antennae and Support Structures.

The importance of supporting digital infrastructure connectivity within the County is acknowledged within various chapters of the draft Development Plan, including Chapter 4 Economic Development and Chapter 7 Transport and Infrastructure. Whilst the comments within the submission are noted, the principle of engagement between local communities and the providers of telecommunication infrastructure is considered to be an important one and an example of good practice, and as such is reflected within telecommunication objective TCO 4.

Criteria G of Section 15.19 of the Development Management Standards also states the wording 'should' it does not make it mandatory. But however, places emphasis on good practice which encourages engagement with relevant stakeholders. It is noted that a query has arose in respect of 'relevant stakeholders', these could account for neighbours to the proposal, members of the public, local community groups or organisations, there is no specific list as it is important to note the word 'relevant' it is to whom you determine should be relevant to the discussion process.

Criteria G of Section 15.19 shall be reworded however to address a grammatical error.

The level of engagement appropriate for each development shall be commensurate with the scale, nature and location of the telecommunication infrastructure for which permission is being sought.

Chief Executive Recommendation

Amend Section 15.19, Criteria G as follows:

~~"g) Any application for telecommunication should~~ Be accompanied with a communication strategy, ~~this should~~ **which** indicates how the proposal has been discussed with relevant stakeholders such as the local community"

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-59</u>	Jerome Savage	N/A	N/A

Summary of Submission & Issues Raised

This submission relates to themes including housing, environment, business and local economy and acknowledging people.

Housing

- The submission states that the Government's International Protection Accommodation Services (IPAS) policy has shifted a burden on local government, straining services such as schools, medical and housing.
- It is stated in the submission that many of those labelled refugees arrive from countries with no conflict and should not be considered in need of protection.
- The submission suggests that housing policy must include the following:
 1. Native Monaghan people are prioritised.
 2. Followed by other Irish
 3. Refer non-Irish to national agencies
 4. Where non-Irish cannot present identification, consideration should be given to reporting them to gardai
 5. Consider financial aid to allow them to return to their countries. Some may be happy to accept if they find this country not meeting expectations. This will alleviate the county's financial burden, even in the short term.
 6. Even persons presenting with recently acquired Irish passports and with poor English should be encouraged to repatriate.
 7. Allow local initiatives for the use of mobile homes etc where housing is problematic. The favouritism shown by government for modular home accommodation to much travelled visitors is abhorrent with fair play or natural law. The planning laws should reflect this for Irish people to avoid a two-tier planning system - soft on visitors to the country and stringent on native Irish.
 8. The council must acknowledge it is fostering an apartheid type system which only induces bitterness & consternation. It should be priority to stop & reverse this obvious unfairness.

Environment

- Garish shop fronts should be refused permission and a return to traditional shop fronts encouraged.
- End any policy to reduce open hearth fires Man made climate change are largely now debunked. 0.04% of atmosphere being carbon.
- Encourage growing of our own in the interest of sustainability by providing advice by reducing allotment fees etc. Organic food is and can be a valuable resource.
- Routinely measure EMF waves from phone masts and publish results in local media & annual report. Identify where limits are breached and follow up with the company. This should also apply to urban areas.
- Ban weed killer e.g. round up. Proven to cause cancer. The submission refers to an article in the New York Times - <https://www.nytimes.com/2019/03/27/us/monstanto-roundup-california-verdict.html>

Taking Monaghan Responsibilities seriously

- The submission states that the bias against Irish local people needs to be addressed with favouritism for foreigners to be recognised as unfair and no less than racist - especially when it comes to housing. Reference is made to a recent RTE Katie Hannon Show (11/11/24).

Business and Local Economy

- Encourage traditional craft Irish shop fronts produced by local carpenters. To update existing fronts to a historic & relevant traditional type - provide grant support.
- Begin phasing out of garish neon plastic shop fronts which have a non-traditional aspect.
- Apply a dereliction tax to new multinational stores whose financial might inevitably causes local family based stores to close. Monopoly characteristics ensures their ability to withstand short term & even long-term financial pressures - unlike local traders.
- Allow partial rates refund to traditional Irish family-based stores.

Our people – Acknowledging our prime responsibility

- Consider special status for a shrinking ethnic Irish population in towns & villages, a population in danger of being isolated in ethnic Irish pockets and a minority in their own areas.
- Irish retailers are diminishing at a noticeable rate in our towns & villages. In many Irish towns ethnic Irish retailers are a minority. Other ethnic populations from outside Ireland are unable to utilise considerably more resources for whatever reason. This support should be matched for ethnic Irish. Presently ethnic Irish cannot avail of state financial support.

There is an obvious need for local authorities to become more independent & recognise that central government has its priorities set in Brussels and in other less than democratic institutions. This must be acknowledged and to plan nationally to make local government more responsive to the people it serves rather than to less than sympathetic bodies without any empathy with rural or small town Ireland.

Chief Executive Response

Several of the issues raised within the submission fall outside the remit of the Development Plan. Issues of relevance to the Development Plan are dealt with as follows:

The distribution of housing is guided by the provisions of the Core Strategy in terms of demographic trends, household sizes, employment patterns etc and national policy and guidance related to housing. The Development Plan sets out principles and policies to guide the development of housing in urban and rural areas based on national guidelines and having regard to local conditions based on the prevalent character of development in the area.

Section 15.10.5 and Policy TRAP1 of the Development Plan acknowledge that it may be necessary to provide temporary residential accommodation to facilitate site specific, exceptional and/or personal circumstances, and in these instances, the Planning Authority may consider granting temporary permission for the installation of temporary residential accommodation.

Section 15.4 of the Development Plan acknowledges that well maintained shopfronts add character to a street, and they have an important role in defining the character of the streetscape and note that the quality of townscapes can be diminished by shopfronts in poor condition or of poor design. As such, the Development Plan states that the retention and refurbishment of historic shopfronts in lieu of their removal and replacement with a modern shopfront will be required, unless demonstrated otherwise to the satisfaction of the Planning Authority. This section of the plan also states that the use of plastic, vinyl or neon signs should be avoided, and only high-quality materials used with respect to shopfront signage.

Circular Letter PL/07/12 indicates that Planning Authorities should be primarily concerned with the appropriate location and design of telecommunications structures and do not have the competence for health and safety matters in respect of telecommunications infrastructure. These are regulated by other codes and such matters should not be additionally regulated by the planning process. The Guidelines provide that an installation is considered safe where it complies with the appropriate international standard ICNIRP Guidelines. ComReg has the primary responsibility for the monitoring and enforcement of health and safety issues.

Chief Executive Recommendation

No amendment recommended.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-60</u>	Safe Ireland	N/A	N/A

Summary of Submission & Issues Raised

- The submission requests that a line is inserted into the County Development Plan to indicate intent, and to make real at local level, the Government's commitments to mitigate violence against women. This commitment is set out in Zero Tolerance - the 3rd National Strategy on Domestic Sexual and Gender-Based Violence (DSGBV), published in June 2022.
- The National Domestic Strategy specifies a direct role for Local Authorities in the:
 - Development of Emergency Refuge and Pathways to Stable Housing
 - Creating Safer Public Environments for Women and Girls
 - Coordination of Local Initiatives by LCDCs
- Zero Tolerance also specifies a Community Development Approach to responding to DSGBV at local and/or community level. To this end, within the strategy there are 62 actions across the four pillars, the development of which must be either co-designed or supported by community organisations.
- The submission states that it is therefore important that these commitments are evidenced in a statement of acknowledgement and support within current and emerging County Development Plans to ensure policy at local level can follow national strategy in a coherent manner.
- The submission includes a document with extracts of the aforementioned Zero Tolerance Goals and Actions with page and action references to the source document, along with Safe Ireland's relevant publications: Safe Space Series- Safe Homes, Safe Practice and Safe Mayo a vision strategy for Mayo.
- It is Safe Ireland's wish to develop an evidence-based, whole county, collaborative response that encompasses integrated strategies for prevention, early intervention, response and recovery, so that homes and communities can be safe and equal.
- Submission notes that "Refuge is not the Answer to Domestic Violence" and whilst welcoming the development of emergency accommodation for victims fleeing violence and coercion, the organisation would rather work at 'prevention' level. Submission hopes that this can be done in Cavan and in Monaghan through good planning and roll-out.
- Submission recommends that the following wording is included within the Development Plan "Support for local and community initiatives to prevent and mitigate Domestic, Sexual and Gender Based Violence in accordance with the 3rd National Strategy on Domestic Sexual and Gender-Based Violence Implementation Plan".

Chief Executive Response

The Monaghan County Development Plan acknowledges that the creation of strong inclusive communities is essential to the promotion of County Monaghan as an attractive place to live and work. The importance of community participation in the improvement and maintenance of community facilities is also recognised by Monaghan County Council. The Development Plan notes that community buildings and facilities are vital to fostering a sense of community identity and wellbeing and recognises that continued growth in population has implications for community services as the needs of the population base change. It is essential that through the planning process adequate measures are taken to secure community services to improve the quality of life experienced by the population of County Monaghan.

In addition to objective HSO7 which seeks '*To facilitate the provision of suitable accommodation, where a need is identified, for those with special needs, for the homeless and for those in need of emergency accommodation*', the Development Plan adopts a flexible and supportive approach

towards proposals for community facilities on suitable sites within other land use zoning categories, where such a proposal is suitably located within the settlement boundary and is easily accessible for all sections of the community.

Zero Tolerance: Third National Strategy on Domestic, Sexual and Gender Based Violence 2022-2026, published in June 2022, is a 'whole-of-government' strategy to combat domestic, sexual and gender-based violence (DSGBV). The overarching purpose of the Strategy is that of zero tolerance in Irish society for DSGBV, delivering an enhanced understanding of the root causes and impacts of DSGBV across society, ensuring significant and ongoing reduction in the incidence of DSGBV and supporting changes in behaviour. The Strategy also recognises and acknowledges the need to provide support for all victims/survivors of DSGBV so that Ireland becomes a place where victims and survivors receive quality supports and justice. In this context it is considered appropriate to include the requested wording into Chapter 5, Community of the Development Plan.

Chief Executive Recommendation

It is recommended that Section 5.3, Community Facilities, in Chapter 5, Community is amended as follows:

5.3 Community Facilities

The importance of community participation in the improvement and maintenance of community facilities is recognised by Monaghan County Council. The community voluntary sector in association with relevant statutory bodies sustains vital facilities for the population, playing a vital role in the future development of the County. Community buildings and facilities are vital to fostering a sense of community identity and wellbeing. Continued growth in population has implications for community services as the needs of the population base change. It is essential that through the planning process adequate measures are taken to secure community services to improve the quality of life experienced by the population of County Monaghan. A flexible and supportive approach will be adopted towards proposals for community facilities on suitable sites within other land use zoning categories, where such a proposal is suitably located within the settlement boundary and is easily accessible for all sections of the community. **Monaghan County Council shall continue to provide support for local and community initiatives to prevent and mitigate Domestic, Sexual and Gender Based Violence in accordance with the 3rd National Strategy on Domestic Sexual and Gender-Based Violence Implementation Plan to ensure there is zero tolerance in our society for domestic, sexual and gender-based violence.**

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-62</u>	Anne Walker Summers	N/A	N/A

Summary of Submission & Issues Raised

This submission raises the following points including:

- Concern about the large spread spraying of weed killer in residential areas and the possible side effects which should be published so residents are aware of the health issues with use.
- The submission questions the removal of fires and oil heating in older council houses as these new systems are not suitable for older houses and are causing huge financial difficulties to many poorer families.

Housing

- The submission states that the Government's International Protection Accommodation Services (IPAS) policy has shifted a burden on local government, straining services such as schools, medical and housing.
- It is stated in the submission that many of those labelled refugees arrive from countries with no conflict and should not be considered in need of protection.
- The submission suggests that housing policy must include the following:
 1. Native Monaghan people are prioritised.
 2. Followed by other Irish
 3. Refer non-Irish to national agencies
 4. Where non-Irish cannot present identification, consideration should be given to reporting them to gardai
 5. Consider financial aid to allow them to return to their countries. Some may be happy to accept if they find this country not meeting expectations. This will alleviate the county's financial burden, even in the short term.
 6. Even persons presenting with recently acquired Irish passports and with poor English should be encouraged to repatriate.
 7. Allow local initiatives for the use of mobile homes etc where housing is problematic. The favouritism shown by government for modular home accommodation to much travelled visitors is abhorrent with fair play or natural law. The planning laws should reflect this for Irish people to avoid a two-tier planning system - soft on visitors to the country and stringent on native Irish.
 8. The council must acknowledge it is fostering an apartheid type system which only induces bitterness & consternation. It should be priority to stop & reverse this obvious unfairness.

Environment

- Garish shop fronts should be refused permission and a return to traditional shop fronts encouraged.
- End any policy to reduce open hearth fires Man made climate change are largely now debunked. 0.04% of atmosphere being carbon.
- Encourage growing of our own in the interest of sustainability by providing advice by reducing allotment fees etc. Organic food is and can be a valuable resource.
- Routinely measure EMF waves from phone masts and publish results in local media & annual report. Identify where limits are breached and follow up with the company. This should also apply to urban areas.
- Ban weed killer e.g. round up. Proven to cause cancer. The submission refers to an article in the New York Times - <https://www.nytimes.com/2019/03/27/us/monstano-roundup-california-verdict.html>

Taking Monaghan Responsibilities seriously

- The submission states that the bias against Irish local people needs to be addressed with favouritism for foreigners to be recognised as unfair and no less than racist - especially when it comes to housing. Reference is made to a recent RTE Katie Hannon Show (11/11/24).

Business and Local Economy

- Encourage traditional craft Irish shop fronts produced by local carpenters. To update existing fronts to a historic & relevant traditional type - provide grant support.
- Begin phasing out of garish neon plastic shop fronts which have a non-traditional aspect.
- Apply a dereliction tax to new multinational stores whose financial might inevitably causes local family based stores to close. Monopoly characteristics ensures their ability to withstand short term & even long-term financial pressures - unlike local traders.
- Allow partial rates refund to traditional Irish family-based stores.

Our people – Acknowledging out prime responsibility

- Consider special status for a shrinking ethnic Irish population in towns & villages, a population in danger of being isolated in ethnic Irish pockets and a minority in their own areas.
- Irish retailers are diminishing at a noticeable rate in our towns & villages. In many Irish towns ethnic Irish retailers are a minority. Other ethnic populations from outside Ireland are unable to utilise considerably more resources for whatever reason. This support should be matched for ethnic Irish. Presently ethnic Irish cannot avail of state financial support.

There is an obvious need for local authorities to become more independent & recognise that central government has its priorities set in Brussels and in other less than democratic institutions. This must be acknowledged and to plan nationally to make local government more responsive to the people it serves rather than to less than sympathetic bodies without any empathy with rural or small town Ireland.

Chief Executive Response

Several of the issues raised within the submission fall outside the remit of the Development Plan. Issues of relevance to the Development Plan are dealt with as follows:

The distribution of housing is guided by the provisions of the Core Strategy in terms of demographic trends, household sizes, employment patterns etc and national policy and guidance related to housing. The Development Plan sets out principles and policies to guide the development of housing in urban and rural areas based on national guidelines and having regard to local conditions based on the prevalent character of development in the area.

Section 15.10.5 and Policy TRAP1 of the Development Plan acknowledge that it may be necessary to provide temporary residential accommodation to facilitate site specific, exceptional and/or personal circumstances, and in these instances, the Planning Authority may consider granting temporary permission for the installation of temporary residential accommodation.

Section 15.4 of the Development Plan acknowledges that well maintained shopfronts add character to a street, and they have an important role in defining the character of the streetscape and note that the quality of townscapes can be diminished by shopfronts in poor condition or of poor design. As such, the Development Plan states that the retention and refurbishment of historic shopfronts in lieu of their removal and replacement with a modern shopfront will be required, unless demonstrated otherwise to the satisfaction of the Planning Authority. This section of the plan also states that the use of plastic, vinyl or neon signs should be avoided, and only high-quality materials used with respect to shopfront signage.

Circular Letter PL/07/12 indicates that Planning authorities should be primarily concerned with the appropriate location and design of telecommunications structures and do not have the competence for health and safety matters in respect of telecommunications infrastructure. These are regulated by other codes and such matters should not be additionally regulated by the planning process. The Guidelines provide that an installation is considered safe where it complies with the appropriate international standard ICNIRP Guidelines. ComReg has the primary responsibility for the monitoring and enforcement of health and safety issues.

Chief Executive Recommendation

No amendment recommended.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-76</u>	Saint-Gobain Mining (Ireland) Ltd c/o SLR Environmental Consulting (Ireland) Ltd	N/A	N/A

Summary of Submission & Issues Raised

- The Draft Development Plan refers to the extractive industry in Sections 4.9 and 15.18. The author welcomes the recognition of the *“Policy Statement on Mineral Exploration and Mining – Critical Raw Materials for the Circular Economy Transition”* published by the Department of the Environment, Climate and Communications (DECC) in December 2022.
- The submission notes that the Draft Plan is generally in line with previous development plans and seeks to provide a balance between the need to extract a geological resource with the proper protection of environmental and social considerations as appropriate. The authors are supportive of this approach
- The submission notes that the Draft Plan also refers to the *“Quarries and Ancillary Activities – Guidelines for Planning Authorities”*, published by the Department of Environment, Heritage and Local Government (now DECC) in April 2004. Chapter 2 of these guidelines provide advice to County Development Plan policies and states the following: *“In an area containing significant aggregate resources, the plan should acknowledge their economic value, which may be of national or regional importance. Since aggregates can only be worked where they occur, priority should be given to identifying the location of major deposits, and to including a commitment to safeguard valuable unworked deposits for future extraction. This does not imply a blanket ban on other forms of development, but consideration should be given to the fact that the proximity of major new housing developments, for example, could effectively sterilise such deposits.”*
- The submission states that in both the DECC’s guidance document and policy statement, there is reference to the protection of the geological resource from potential sterilisation due to development. Submission continues to state that it is clear that this guidance does not suggest a ban but encourages balanced planning that respects both extractive and non-extractive developments.
- Section 15.18 of the Draft Development Plan acts counter to these policies. Section 15.18 states *“Proposals for extractive industry shall normally be resisted in the following circumstances: b) Where it is located in close proximity to existing extractive sites of significant resource potential and such developments would limit future exploitation of the existing extractive site”*. The Draft Development Plan therefore suggests that the only development which may need to be resisted if located next to existing extractive development is a proposed extractive development.
- It is common that proposed extractive industry is required to be located next to, or near to, existing extractive development as a geological resource is geographically fixed. For example, Saint-Gobain’s mines developed over an extended time are all co-located and all mine the same gypsum resource. Sterilisation is not a concern due to co-location. However, the Draft Plan wording may create confusion as it suggests that there is some form of a concern if locating proposed and existing extractive industry in close proximity.
- The current Monaghan County Development Plan 2019 – 2025 includes the following policy: *“EIP 3 - To restrict development proposals located in close proximity to existing extractive sites of significant resource potential where such developments would limit future exploitation”*, whilst the previous Monaghan County Development Plan 2013 – 2019 provided: *“EIP 6 - Restrict other development in the neighbourhood of existing extractive sites or sites which have significant resource potential, where such developments would limit the future exploitation.”*

- It is further noted that the Chief Executive’s Report (February 2024) for the pre-draft submission round has stated in relation to the existing mines operated in the county: *“...it is important to note that the mine is a strategic national resource (being the only operational gypsum mine in the Country) which contributes to the economy of Monaghan and a raw material for the construction Industry. Monaghan County Council have no mandate to ban Mineral Extraction. The consideration of large-scale applications such as the Mine must be thoroughly and robustly assessed against relevant Planning and Environmental Policy.”*
- The submission requests a review of the current policy to ensure protection of mineral resources, which is consistent with national guidelines and notes that the policies previously included within the 2013 and 2019 development plans align more closely with national policy.
- The submission requests that Section 15.18 of the Draft Plan could be edited to include the following text taken from previously published editions of the Monaghan County Development Plan: *“Restrict other development in the neighbourhood of existing extractive sites or sites which have significant resource potential, where such developments would limit the future exploitation”* and that reference to resisting proposals for extractive development near existing extractive sites and paragraph “b” be omitted from the final CDP.
- In conclusion, the submission notes that the minor revision would help prevent unintended resource sterilisation and streamline the planning process for future industry proposals in Monaghan.

Chief Executive Response

The County Development Plan acknowledges that mineral reserves are processed at many locations across County Monaghan. It also recognises that these significant natural resources make an important contribution to the local economy and acknowledge that they should be safeguarded for future use as reflected in Objective MEO 1 which seeks *‘to promote developments involving the extraction of mineral reserves and their associated processes, where such developments are carried out sustainable manner that does not adversely impact on the environment or on other land uses’*.

By their nature, aggregates can only be worked where they occur, and it is acknowledged that there will be a continuing need for some new or expanded aggregate quarrying operations on land to meet regional and local requirement and therefore it is important to safeguard sites of significant resource potential from other developments as opposed extractive industry developments which would limit/prevent future exploitation.

Mineral extraction, such as working with stone, sand and gravel, can however generate environmental capacity problems for the surrounding areas and therefore it is also considered important to ensure that impacts on the environment and communities from such developments are acceptable.

Chief Executive Recommendation

It is recommended that Section 15.18, Extractive Industry, in Chapter 15, Development Management Guidelines, is amended as follows:

Any application for an extractive industry shall have regard to the Quarrying and Ancillary Activities, Guidelines for Planning Authorities (DEHLG 2004), Guidelines for Environmental Management in the Extractive Industry (EPA, 2006), Guidelines on Biodiversity in the Extractive Industry (NPWS), Geological Survey of Ireland Geological Heritage Guidelines for the Extractive Industry (2008), the Archaeological Code of Practice (2009) and the Architectural Heritage Protections Guidelines for Planning Authorities (DAHG, 2011) and any new or update/subsequent documents.

In recognition of the important contribution extractive industries make to the local economy, development proposals located in close proximity to existing extractive sites or sites which have

significant resource potential, will be resisted where such development would limit the future exploitation of these sites.

Proposals for extractive industry shall normally be resisted in the following circumstances:

- a) Where it is located within an Area of Primary or Secondary Amenity, Special Protection Area, Special Area of Conservation, Natural Heritage Area or Proposed Natural Heritage Area, Architectural Conservation Area or on or near protected structures, recorded monuments and places, unless in exceptional circumstances where the Planning Authority is satisfied that the need for the resource outweighs the environmental impact.
- b) Where it is located in close proximity to existing ~~extractive sites of significant resource potential and such developments would limit future exploitation of the existing extractive site~~ **developments where potential sources of nuisance are considered to be incompatible.**
- c) Where it may have a detrimental impact on the natural or built environment or matters of acknowledged public importance.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-79</u>	Age Friendly Ireland	N/A	N/A

Summary of Submission & Issues Raised

- The submission has been made in the context of population ageing and the need to prepare appropriate housing options for older people to support ageing in place, independent living, and overall health and wellbeing in the community.
- Ireland’s population is growing and is expected to reach 6.69 million in 2051. The Central Statistics Office anticipates substantial rises in the population of older people, projecting up to 1.7 million people aged 65 and over by 2051. This age group will comprise over a quarter of the population at mid-century. The number of people aged 80 years and over is projected to rise from 189,100 in 2022 to potentially 549,000 (+271.4%) in 2051.
- The submission takes into consideration the actions outlined in the policy statement entitled Housing Options for Our Ageing Population (2019) prepared by the Department of Housing, Planning and Local Government and the Department of Health (2019), Section 6.4 entitled Age Friendly Communities of the National Planning Framework (Project Ireland 2040) and Housing Policy Objective 6: Increase and improve housing options for Older People within Housing for All, A New Housing Plan for Ireland prepared by the Department of Housing, Planning and Local Government (2021).
- The submission strongly recommends that the draft Monaghan County Development Plan considers enhancing the focus on Age Friendly Universal Design for the future delivery of Age Friendly developments to make County Monaghan a great place to age and grow older with accessibility for everyone of all ages and abilities.
- The 2019 joint policy statement Housing Options for our Ageing Population included specific actions as follows:
 - Ensure that 50% of apartments in any development that are required to be in excess of minimum sizes are suitable for older people/mobility impaired people and develop a template layout guide for same. (Action 4.4)
 - In partnership with industry, introduce measures to ensure that over a five-year period delivery is increased to ensure that 30% of all new dwellings are built to incorporate universal design principles to accommodate our ageing population. (Action 4.6)
- In Ireland, the Housing Options for Our Ageing Population Policy Statement (2019) emphasises the importance of choice in housing for older people. A key principle underpinning Government housing policy is to support older people to live in their own homes with dignity and independence for as long as possible.
- In the design and delivery of age friendly homes in county Monaghan, Age Friendly Ireland recommends that following criteria are considered within the draft Monaghan County Development Plan:
 - The principles of age friendly universal design that support the optimal design and layout of buildings and neighbourhoods that cater for all age groups, and the promotion of energy efficiency to improve the environmental performance of buildings and the integration of renewable technologies into the design of new buildings is also encouraged. This concept of providing lifetime adaptable homes is a national policy stated in National Policy Objective 34 of the NPF, which states “Support the provision of lifetime adaptable homes that can accommodate the changing needs of a household over time”. The following guidance documents are useful reference points in relation to the design and layout of residential developments:
 - a) Design Manual for Quality Housing, DHLGH (2023)
 - b) Ten Universal Design Features to include in a Lifetime Adaptable and Age Friendly

Home (Age Friendly Ireland) – as attached with this submission.

c) Universal Design Guidelines for Homes in Ireland (National Disability Authority & Centre for Excellence in Universal Design)

d) Building for Everyone (National Disability Authority & Centre for Excellence in Universal Design)

e) Being Age Friendly in the Public Realm, Guidelines and Good Practice, (Age Friendly Ireland) – as attached with this submission.

f) Universal Design Guidelines Dementia Friendly Dwellings for People with Dementia, their Families and Carers (National Disability Authority & Centre for Excellence in Universal Design)

- Age Friendly Ireland recommends that Monaghan County Council considers the inclusion of a new objective within the County Development Plan to require the provision of between 15-30% of dwellings and apartments in new private residential developments of ten units or more to be Age Friendly Adaptable Lifetime Homes, suitable to accommodate or adaptable to provide accommodation for people with disabilities and older people in accordance with the requirements of the 'Housing Options for Our Ageing Population Policy Statement' (2019), published by the Department of Housing, Planning and Local Government and the Department of Health and 'Building for Everyone: A Universal Design', 'Universal Design Guidelines for Homes in Ireland' developed by the Centre for Excellence in Universal Design (National Disability Authority). Planning applications will be required to demonstrate compliance with this objective, and to show an accessible route to the residential units from the boundary of the property. Proximity and access to local services must also be considered relative to the units. A universal design statement shall be provided as part of all new planning applications to demonstrate this requirement.
- Age Friendly Ireland recommends that Monaghan County Council considers the inclusion of a policy requiring 30% of social housing in new residential developments of ten units or more to be Age Friendly Adaptable Lifetime Homes, suitable to accommodate or adaptable to provide accommodation for people with disabilities and older people in accordance with the requirements of the 'Housing Options for Our Ageing Population Policy Statement' (2019), published by the Department of Housing, Planning and Local Government and the Department of Health and 'Building for Everyone: A Universal Design', 'Universal Design Guidelines for Homes in Ireland' developed by the Centre for Excellence in Universal Design (National Disability Authority). Planning applications will be required to demonstrate compliance with this objective, and to show an accessible route to the residential units from the boundary of the property. Proximity and access to local services must also be considered relative to the units. A universal design statement shall be provided as part of all new planning applications to demonstrate this requirement.
- In accordance with the principles of Housing Options for Our Ageing Population – Policy Statement 2019, Age Friendly Ireland recommends that Monaghan County Council will promote an age friendly approach with respect to new residential developments in County Monaghan. Applicants for residential development should consider the incorporation of homes suitable for older persons within proposed schemes and homes should include the age friendly principles taken from the Ten Universal Design Features in a Lifetime Adaptable and Age Friendly Home published by Age Friendly Ireland. These set out that an Age Friendly Home should include the following features:
 - a. Neighbourhood Location and Close to Amenities,
 - b. Is well-connected to local amenities,
 - c. Is easy to approach and enter,
 - d. Is connected to the outdoors,
 - e. Is easy to move about in,
 - f. Has accessible and adaptable toilets and bathrooms,

- g. Has a guest bedroom,
 - h. Has easy to use fittings and fixtures,
 - i. Are energy and cost efficient,
 - j. Has good security and technology system.
- Age Friendly Ireland recommends that Monaghan County Council consider proposals, including the development of small infill sites for appropriate forms of residential development for age friendly housing, including opportunities for those wishing to rightsize from larger family homes to more appropriately sized units 'Right-Sizing' with benefits of town centre living and proximity to community infrastructure, transport etc. Housing proposals specifically aimed at older people should be designed having regard to Universal Design Standards enabling the property to be future proofed for the possible care needs of the occupant and to ensure sufficient floor space to cater for care assistance/visitors. In this regard, development proposals will be required to comply with any future technical guidance relating to design specifications for housing for older people in place at the time of making the planning application.
 - Under Section 15.2.13 Access for All of Volume 1 – Written Statement and Maps, Age Friendly Ireland recommends that Monaghan County Council, includes the requirement an age friendly universal design statement to be provided by all applicant for all new residential development of ten dwellings/apartments or more demonstrating the age friendly universal design principles applied through the proposed development and how the proposed development complies with the 'Building for Everyone: A Universal Design', 'Universal Design Guidelines for Homes in Ireland' developed by the Centre for Excellence in Universal Design (National Disability Authority).
 - The submission notes that many local authorities stipulate within their development plans minimum percentages for Universal Design and Age Friendly housing. For instance, Policy Objective HOU 29 of the Louth County Development Plan (2021 to 2027) states: To seek that all new residential developments in excess of 20 residential units provide for a minimum of 30% universally designed units in accordance with the requirements of 'Building for Everyone: A Universal Design Approach' published by the Centre for Excellence in Universal Design and Policy Objective UB-P-11 of the Donegal County Development Plan (2024 to 2030) requires that: all new residential developments in excess of 20 residential units provide for a minimum of 30% universally designed units in accordance with the requirements of 'Building for Everyone: A Universal Design Approach' published by the Centre for Excellence in Universal Design. The recommendations within this submission are in line with government policy and best practice in other jurisdictions.

Chief Executive Response

As of 2022, there were 10,397 people over the age of 65 living in County Monaghan, constituting 15.9% of the population and increasing by 21% since Census 2016. This proportion is higher than the state average of 15.1%. The Draft Development Plan recognises that housing is a function that must adapt to meet the needs of a growing number of older people and notes that Monaghan County Council will continue to work with relevant agencies and the private sector to facilitate suitable proposals for the accommodation of older people.

Section 3.17.7 of the Development Plan acknowledges that there is a demand for accessible private housing for older people and/or people with disabilities and that a measure is required to encourage the provision of accessible housing within the private market. This Section also notes that housing should be designed to be flexible to accommodate the changing needs of the groups, families and individuals who occupy them over the lifetime of a house. Additionally, the Development Plan recognises that the needs of occupants will vary as individual circumstances change and states that lifetime housing should be fully accessible and easily adaptable at minimum cost and minimum

disruption. Crucially, the Development Plan clearly states that the principles of universal, inclusion, barrier free design should be demonstratively applied where possible and notes that the development of flexible housing design will be supported.

It is therefore considered that the following objectives encourage the provision of housing which is accessible for all ages and abilities:

HSO 9: To encourage and support proposals for new residential developments that offer a range of types, sizes, design and tenures of housing units, such as retirement housing or assisted housing schemes.

HSO 10: To support a range of mixed tenure housing types and forms which provide affordable and accessible housing for people of various ages, abilities, and family sizes, while meeting all planning and environmental considerations, particularly in respect of housing in the rural areas.

HSO 12: To support the development of nursing homes, residential care facilities and sheltered housing whilst ensuring these facilities are integrated within the communities they serve.

Section 15.2.13 of the Development Plan deals specifically with Access for All and states 'The refurbishment of existing buildings or proposals for new development, particularly those intended for public use, must be designed in accordance with the standards outline in the National Disability Authority – Building for Everyone; A Universal Design Approach (2012) (or any new or updated/subsequent versions) and in compliance with Part M of the Building Regulations'.

Section 15.8.4 of the Development Plan, recognises the important of the provision housing of different types, sizes and tenures and states that developers will be encouraged to provide single storey dwellings for the elderly, those with impaired mobility, and to facilitate downsizing in all developments. Additionally, the Development Plan states that in private housing schemes, normally a minimum of 10% of housing units shall be 2-bedroom units and also that the design of new dwellings shall have a high degree of flexibility to allow for adaptability for lifetime housing needs and for those with impaired mobility. However, it is considered that specific reference to the principles of Housing Options for Our Ageing Population – Policy Statement 2019 and Ten Universal Design Features to include in a Lifetime Adaptable and Age Friendly Home – June 2021 should be provided to reinforce the Council's commitment to the provision of Age Friendly Housing.

The Development Plan seeks to promote sustainable compact development forms including infill sites. Section 15.2.3 of the Plan specifically deals with infill development in towns and villages. Whilst development proposals will be encouraged on infill sites, proposals shall be considered individually on their merits and assessed against the relevant objectives and policies of the Development Plan.

As a result of the thrust of the existing objectives and policies contained within the Development Plan as detailed above, it is not considered necessary to require minimum percentages for Universal Design and Age Friendly housing to be provided within residential developments nor is it necessary to require the submission of a universal design statement with respect to all residential developments.

Chief Executive Recommendation

It is recommended that Section 15.8, Multi-Unit Residential Developments, in Chapter 15 is amended as follows:

15.8.4 Dwelling Mix

For a residential development to be considered inclusive, it should make provision for housing of different types, sizes and tenures. This provides choice and helps to create a balanced, sustainable community. The provision of a variety of different house types will create visual variety and social dynamic, thereby preventing residential development being homogenous in character. **In accordance with the principles of Housing Options for Our Ageing Population – Policy Statement 2019, the Council will promote an age-friendly approach by ensuring that both existing and proposed residential developments are future proofed for an ageing population.** In particular, developers will be encouraged to provide single storey dwellings for the elderly, those with impaired mobility, and to facilitate downsizing in all developments. **Where the Planning Authority deems appropriate, applicants for residential development should consider the incorporation of units suitable for elderly persons within proposed schemes and consideration should be given to accompanying facilities and materials in line with the age friendly principles taken from the Ten Universal Design Features to include in a Lifetime Adaptable and Age Friendly Home – June 2021, published by Age Friendly Ireland.** In private housing schemes, normally a minimum of 10% of housing units shall be 2-bedroom units. The design of new dwellings shall have a high degree of flexibility to allow for adaptability for lifetime housing needs and for those with impaired mobility.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-88</u>	Kevin V. and Claire Mulligan	Greaghlonge, Carrickmacross, County Monaghan, A81 KH52	N/A

Summary of Submission & Issues Raised

- Seeks the addition to the Record of Protected Structures (RPS) of a vernacular farmhouse at Greaghlonge (NIAH ref. 41403015).
- The house has been recorded by the National Inventory of Architectural Heritage (NIAH) featured in the NIAH architectural heritage publication at page 26, and more recently the house has been the subject of one of the Heritage Office podcasts which was used as a case study in Vol. 2 of the County Monaghan Heritage Series, Monaghan's Traditional Rural Houses (2024) produced by Lotts Architecture with Monaghan County Council.
- This important vernacular farmhouse was subject to a ministerial recommendation for inclusion in the RPS in 2015 (evidence attached to submission) and despite expressing their approval and support of this, the property was not added to the RPS at that time. Since then, repeated efforts over the past ten years have been made to have the property included and some assurances were given from the local authority that it would be included under the relevant processes (attached correspondence). It was therefore reasonably expected that the building would finally be included as an addition to the Draft Monaghan County Development Plan 2025-2031 in accordance with Section 12. subsection (3) (a) & (b) of the Planning and Development Act 2000 (the Act).
- This submission therefore requests that the local authority use its powers under the Act 2000 to formally make the addition of this vernacular farmhouse (NIAH 41403015) to the RPS now, where the act allows for material alterations to the Draft CDP, under Section 12 subsection 7.
- There are well-established precedents for similar additions (and deletions) to the RPS as material alterations, such as those within the Kerry County Development Plan 2022-2028.
- Historical email correspondence pertaining to this request was included within this submission.

Chief Executive Response

The submission seeks the additional of a building onto the Record of Protected Structures. The emails/letter correspondence with the Councils Forward Planning team dating back to 2015 included with this submission are noted. This correspondence requested the inclusion of this building onto the Protected Structures Register. The submission includes the appraisal of this building within the NIAH which states, *'Recently sensitively renovated and extended, this house and its outbuildings retain their form and scale which contribute to its character and charm. Its form and fabric are representative of Irish vernacular farmhouses. The building footprints appears to have changed little since the early nineteenth century. Typically, of vernacular farmhouses, the front elevation faces south, to benefit from the path of the sun. The small openings, simple forms, local materials, and the placing of outbuildings to the front rather than the rear of the house, are all typical of the vernacular tradition'*.

The building was not included as an addition to the Draft Monaghan County Development Plan 2025-2031 which went on public display. The landowners have sought the inclusion of this structure and given that it represents a preserved vernacular farmhouse recognised in the NIAH, it is recommended that it be added to the RPS based on its special architectural categories of interest.

Chief Executive Recommendation

It is recommended to include the following addition in red text to the RPS for County Monaghan, **Vernacular Farmhouse at Greaghlonge, Carrickmacross, A81 KH52 (Appendix 1A)**.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-90</u>	Keep Ireland Open	N/A	N/A

Summary of Submission & Issues Raised

Keep Ireland Open (KIO) is a voluntary organisation with primary aim to lobby for the legal right to reasonable access to the countryside.

Comments in respect of format of chapters, layout, and cross-referencing from Policy Chapters to Development Management Standards.

Submits that prefixing with '*Contribute to*' should be deleted as it could be interpreted as meaning that somehow the provisions aren't the primary responsibility of Councils, which isn't the case. Submits that '*subject to funding and resources*' should be deleted as many other policies and objectives have financial implications, and it is invidious to single out particular ones.

Refers to content of various other CDPs, in respect of policies/objectives that could be included in the Monaghan CDP.

Economic Development: consider objectives to support small rural enterprise, buildings in the countryside and having regard to social and environmental impacts.

Agriculture and Forestry: submits that these should be dealt with separately, and should include additional policies/objectives in relation to adoption of a Land Use Strategy, support agri-environmental schemes, impact on amenity, landscape, environment, compliance with EU strategies on food, biodiversity, intensive agricultural units impact on environmental and natural heritage, amenity of forests, provision of public access, encourage forestry in accordance with national & EU standards, landscape capacity assessment for commercial afforestation, sustainable forestry, community schemes, biodiversity and environmental protection.

Quarrying: submits the inclusion of objectives for rehabilitation of disused quarries and extractive sites to include for habitat restoration and recreation, quarrying activities to comply with EU Habitats Directive, and Planning, EPA Guidelines, Landscape, consider impacts on environment, heritage, conservation, important sites, amenity.

Tourism: supports objectives

Community: submit that cycling and walking should be dealt with separately. Submit way-marked ways should be included and data base of website, and objectives to promote walking and expansion of network of safe walking trails. Also submit that a Table of cycle routes with maps should be included along with objectives to promote and support a network of safe cycle routes, including engaging in CPO if necessary, and to provide cross-county strategic network. Support recreational potential of the countryside in accordance with the National Countryside Recreation Strategy.

Public Rights of Way: requests that Policy CFO 24 be amended so that the process of mapping and listing public rights of way be commenced '*within two years*' of the adoption of the plan, along with additional polices to support identification, recognition and protection of rights of way

Heritage, Conservation and Landscape

Heritage and Biodiversity Plan: requests additional objectives to support, promote and implement the objectives and actions of the Plan

Heritage Conservation and Landscape: requests objectives to protect county and local level landscapes designations from incompatible developments, including for updated County Landscape Character Assessment supporting national and regional legislation and guidance, and supporting the regional approach to landscape assessment.

European Sites: submit the addition of objectives to ensure protection of European sites, SACs, SPAs, NHAs, pNHAs, Geological sites, wetlands, compliance with Habitats Directives, and for Appropriate Assessment in accordance with legislation and guidance.

Archaeological Heritage: submit the addition of objectives/policies with regard to signage complying with state legislation, opening hours of site, access to sites, protection of sites, excavations carried out under best practice, to support community initiatives and awareness.

Renewable Energy Objectives: submit that the Renewable Energy Strategy for the county should be prepared '*within two years*' rather than over the lifetime of the Plan, along with additional objectives to encourage and facilitate various forms of renewable energy development, in accordance with relevant guidelines along with community consultation at initiation of project planning, the recording and monitoring of renewable energy potential, promote micro-renewables, having regard to Habitats Directive and environmental and landscape considerations.

Telecommunications Antennae and Support Structures: proposes amendments to section 15.19, to include for high quality, best practice in design in the interests of visual amenity and protection of sensitive landscapes, and in respect of co-location, with co-location agreements and demonstration of reasonable effort to share facilities/cluster.

Submit for the inclusion of additional objectives: for protection of existing public rights and to prohibit development if they impinge thereon or on any recreational amenity or public access to the countryside, to ensure landscape protection, location within existing forestry, if possible, ensure consistency with Habitats Directive.

Electricity and Gas Infrastructure: should include additional policies on Undergrounding and Overgrounding.

Undergrounding: consider the feasibility of undergrounding or alternative routes, especially in landscape character areas of high sensitivity, so as to ensure the provision of new transmission networks can be managed in terms of their physical and visual impacts on the natural environment and the conservation value and the ecological integrity of European sites. And to cooperate with agencies to facilitate undergrounding of all electricity cables in all environments, where possible, in the interests of visual amenity. Proposals for undergrounding cables should demonstrate that environmental impacts are minimised, including: habitat loss as a result of field boundaries and hedgerows (rights of way preparation) followed by topsoil stripping to ensure machinery doesn't destroy soil structure or drainage properties, short to medium impacts on the landscape where hedgerows are encountered and impacts on underground archaeology, on soil structures and drainage and on surface waters as a result of sedimentation.

Overgrounding: to locate transmission lines in non-scenic areas where possible, to support the implementation of Eir Grid's 25 Investment Programme, 'Shaping Our Electricity Future Roadmap,' ensure routes don't have detrimental/adverse impacts on natural heritage, landscape, amenities, environment, designated sites and wildlife habitats, communities, that best practice is followed in siting and design, and the least environmental impact on landscape.

Landscaping and Boundary Treatment: should include policies/objectives for Views and Prospect and Scenic Routes for provision and maintenance of facilities, incl. viewing areas, lay-bys, safe pedestrian access, parking, seats, signage; to safeguard and preserve listed protected views and prospects from intrusive/inappropriate development, regulate development that would seriously obstruct and detract from designated scenic routes

Fencing of hitherto open lands: concerns in relation to fencing on uplands, with barbed wire with no stiles, impinging on access to walkers, and with fences in disrepair endangering safety. Contends that new fencing of land open to or used by the public during the ten years preceding is not exempt development in accordance with Article 9 (l) (a) (x) of the Planning Regulations. Proposed policy objective to preserve the status of traditionally open/unfenced landscapes, to include that fencing in upland or amenity areas will not normally be permitted unless essential to the viability of the farm and conforms to best agricultural practice, with details to be agreed, barbed wire no to be used for top line of wire, and requirement for stiles or gates.

Historic Graveyards and Burial Grounds: to support the work of Historic Graveyards Network, to include objectives to support and protect all historic burial grounds and their settings and encourage and promote appropriate care management and maintenance in accordance with conservation principles and best practice guidelines.

Islands: to include for protection of islands in lakes and rivers from inappropriate development, including landscape character, heritage, historic and scenic amenity, and to support, promote and facilitate public access with cooperation of owners.

Mass Rocks and Holy Wells: proposes a study over the lifetime of the Plan to assess the significance of Mass Rocks and Holy Wells, and to preserve, protect and enhance, where necessary.

Peatlands: to support and work with relevant agencies in advancing rehabilitation works to prepare a comprehensive after use framework plan for large cutaway bog sites and associated workshops, office buildings and industrial sites which provide for future sustainable environmental needs and are a significant resource for amenities when peat harvesting finishes. To support and implement any relevant recommended actions of the National Peatlands Strategy 2015 and National Raised Bog SAC Management Plan 2017-2022, to prioritise restoration of raised and blanket bogs, (Heritage Ireland Act 2030), to prepare a Peatlands Strategy, to ensure and work in partnership with stakeholders.

Greenways, Blueways, Peatways: supports continued funding and development of these to achieve Sport Ireland Trail registration for all existing and proposed trails, wherever possible, to integrate natural borders/buffers as integral component of design so as to promote natural enhancement, and to support the development of strategic greenways, blueways and peatways in accordance with 'The Strategy for the Future Development of National and Regional Gateways 2018.'

The Draft CDP fails to comply with, have regard to or take account some of the provisions in plans in adjoining counties, Heritage Act 1995, Heritage Ireland 2030, RSES.

Chief Executive Response

The contents of the submission are noted. The Planning Authority is satisfied that the policies and objectives of the Draft Plan appropriately address the concerns raised in the submission, with the exception of points raised in relation public rights of way and a Renewable Energy Strategy.

In respect of the preparation of a Renewable Energy Strategy for the county, and also noting the recommendation of the OPR, requesting the Planning Authority to commit to the preparation of a Renewable Energy Strategy and to a variation of the County Development Plan to incorporate its recommendations into the adopted Plan within one year of the publication of the Methodology for Local Authority Renewable Energy or a regional renewable electricity strategy, whichever is the sooner (Objective REO 2), the policy is to be amended to commit to the preparation of a renewable energy strategy for the County and to vary the County Development Plan to incorporate its recommendations into the adopted Plan within one year of the publication of the Methodology for Local Authority Renewable Energy Strategies or the Regional Renewable Electricity Strategy for the Northern and Western Region, whichever is the sooner.

Amend policy REO 2: 'To prepare a Renewable Energy Strategy for the County ~~over the lifetime of this plan and subject to the availability of resources~~ within one year of the publication of the Methodology for Local Authority Renewable Energy Strategies or the Regional Renewable Electricity Strategy for the Northern and Western Region, whichever is the sooner. Such a Strategy shall be shaped and informed by environmental considerations, constraints and sensitivities relevant to the Plan Area – including biodiversity, European sites, and landscape and visual amenity related designations.'

In respect of public rights of way, and also noting the observation from the OPR, requesting the Planning Authority to commit to, while having regard to the requirements of section 10(2)(o) of the Planning and Development Act 2000, as amended, to amend objective CFO 24 to include an 18- month timeframe for preparation of the maps identifying public rights of way and incorporation into the Development Plan by way of variation.

In respect of public rights of way, and also noting observation from the OPR, requesting a commitment to an 18-month timeframe for preparation of the maps identifying public rights of way and incorporation into the Development Plan by way of variation, given the complexity of the matter relating to identifying public rights of way within the County, it will be difficult to achieve an objective of listing and mapping all public rights of way within the County during the first 18 months of the plan. Furthermore, there is a significant number of objectives that are required to be achieved within the first two years of the development plan. Therefore, it is proposed to amend the policy, to the following: Amend Objective CFO 24: To identify and preserve existing public rights of way to recreational areas and to commence the process of mapping and listing public rights of way in the County ~~over~~ within the ~~lifetime~~ first four years of this development plan, ~~as resources allow~~, under the provisions of Section 14 of the Act 2000 (as amended).

Chief Executive Recommendations

Consideration of this submission has contributed to a review of policy objectives **REO 2** and **CFO 24**. Amendments to these objectives have been proposed in response to the OPR submission which adequately address the matters raised in this submission. Therefore, no amendments are recommended here.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-92</u>	Energia	N/A	N/A

Summary of Submission & Issues Raised

- The submission advocates for progressive policies in the Development Plan that align with national climate action goals, particularly the need for stronger emphasis on renewable energy deployment.
- The Development Plan acknowledges climate change and supports renewable energy but does not explicitly adopt a presumption in favour of the promotion of Renewable Energy projects and meeting national renewable energy targets.
- The author welcomes the policies and objectives within the Development Plan which lean towards a permitting environment for renewable energy projects in line with meeting Ireland’s 2030 targets, through the Climate Action Objectives and supports Objective REO1 which states: ‘To support and advance the provision of renewable energy resources and programmes in line with the Governments’ National Energy and Climate Plan 2021 – 2030 and any new or updated/subsequent versions during the lifetime of this plan.’
- The submission notes that the policies within the Development Plan do not go far enough to prioritise the provision of new renewable energy projects and calls for policies that seek to directly prioritise the deployment of renewable energy infrastructure such as the introduction of a minimum megawatt target, to encourage more renewable energy projects within the County and therefore contribute to National targets.
- The submission welcomes Objective REO 2 which seeks “To prepare a Renewable Energy Strategy for the County over the lifetime of this plan and subject to the availability of resources. Such a Strategy shall be shaped and informed by environmental considerations, constraints and sensitivities relevant to the Plan Area - including biodiversity, European sites, and landscape and visual amenity related designations.’ Submission notes that the “Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change” provide that it is a specific planning policy requirement (under Section 28(1C) of the Planning Acts) that, in making a development plan, with policies or objectives that relate to wind energy developments, the Council is obliged to carry out the following:
 - Ensure that overall national policy on renewable energy as contained in documents such as the Government’s ‘White Paper on Energy Policy - Ireland’s Transition to a Low Carbon Future’, as well as the ‘National Renewable Energy Action Plan’, the ‘Strategy for Renewable Energy’ and the ‘National Mitigation Plan’, is acknowledged and documented in the relevant development plan,
 - Indicate how the implementation of the relevant development plan ... over its effective period will contribute to realising overall national targets on renewable energy and climate change mitigation, and in particular wind energy production and the potential wind energy resource (in megawatts); and
 - Demonstrate detailed compliance with the item above in any proposal by them to introduce or vary a mandatory setback distance or distances for wind turbines from specified land uses or classes of land use into their development plan or local area plan. Such a proposal shall be subject to environmental assessment requirements, for example under the SEA and Habitats Directives. It shall also be a material consideration in SEA, when taking into account likely significant effects on climatic factors, in addition to other factors such as landscape and air, if a mandatory setback or variation to a mandatory setback proposed by a planning authority in a development plan or local area plan would create a significant limitation or constraint on renewable energy projects, including wind turbines, within the administrative area of the plan.”

- The submission notes that it is essential that any future Renewable Energy Strategy prepared in respect of Monaghan County should be cognisant of national obligations, ensure that climate change is a key consideration in the preparation of the document and that it is open to new and emerging technologies.
- The submission welcomes the provisions of objective REO 3 which states “To facilitate the sustainable development, renewal and maintenance of energy generation infrastructure in order to maintain a secure energy supply while protecting the landscape, archaeological and built heritage and having regard to the provisions of the Habitats Directive” but also emphasises the need for significant investment in grid infrastructure to support renewable energy development. This support is in context of EirGrid’s predictions of significant growth in the energy demands over the coming 10 years with vast changes in both demand and supply as we move from fossil fuel generation to renewable energy and the changes in the consumer demands.
- The author states that the changing demand and generation supply landscape will require coordinated management of both the volume and type of new capacity, alongside new ways of managing increasing demand to ensure security of supply. To prepare for this change, the submission states that the electricity grid network is required to be stronger and more flexible. Given the scale of change, there is a need to plan for a great deal of new grid infrastructure.
- The draft Plan recognises the role of infrastructure in economic development but does not place sufficient emphasis on the expansion of grid capacity specifically for renewable energy. This presents a gap in ensuring that County Monaghan can facilitate large-scale renewable energy projects like those proposed by Energia. The draft Plan recognises the role of infrastructure in economic development but does not place sufficient emphasis on the expansion of grid capacity specifically for renewable energy. This presents a gap in ensuring that County Monaghan can facilitate large-scale renewable energy projects like those proposed by Energia
- The submission welcomes Objective REO 4 ‘To support the production of sustainable energy from renewable sources such as wind, solar, bio-energy and the development of waste to energy/combined heat and power schemes at suitable locations and subject to compliance with the relevant planning policy, the Habitats Directive, and other environmental considerations’ but considers that it does not go far enough to accommodate the ever-changing technologies that are emerging such as Battery Energy Storage Systems (BESS).
- There is specific need for flexible policies that accommodate emerging technologies. This is supported by national and regional policies and objectives. The draft Plan should incorporate more explicit support for these technologies to ensure that the county remains aligned with Ireland’s long-term energy transition. That being the case, the draft Plan should therefore adopt more flexibility to accommodate emerging renewable BESS, synchronous condensers, and other innovations that will support grid stability and enhance renewable energy integration such as green hydrogen production.
- The submission welcomes the provisions of Renewable Energy Objective REO 8 which states: ‘To work in partnership with local communities and other relevant stakeholders to develop energy efficient and renewable energy projects which benefit the County subject to Development Management Standards as set out in Chapter 15’. Submission notes that it is important that the economic benefits of a renewable energy project should be weighted in the decision-making process.
- The submission refers to Climate Action Objective CAO 4 which seeks to support diversification and innovation in the local economy by endorsing investment in emerging products, services and technologies that assist in the delivery of a low carbon future for County Monaghan. The author states that although the draft plan is broadly supportive of traditional renewable energy technologies like wind and solar, it falls short of direct provision for the support of

meeting national targets and lacks specific mention of emerging technologies such as energy storage.

- Additionally, it is noted that whilst the Development Management Standards set out in Chapter 15 acknowledge there are no national planning guidelines for this type of developments and that applications of this kind will be assessed under the normal planning criteria, there is a potential that this gap could slow the adoption of new technologies that are critical to achieving national energy targets. The author advocates that the use of technologies such as BESS are provided for in objectives and are weighted in the light of achieving national targets.
- The 'Economic Development' section of the draft plan (Chapter 4) has a number of initiatives, policies and objectives in relation to the "green economy", but doesn't sufficiently highlight the significant economic development potential and opportunities that Monaghan's renewable energy resources represent, while largely remaining untapped.
- Chapter 4 contains 10 individual economic objectives and 4 economic development policies, none of which are 'green economy' or 'green energy' policies. Submission notes that Renewable Energy proposals have the ability to generate significant investment opportunities for County Monaghan (as discussed above) throughout its lifetime and to contribute to communities through community benefit funds and to the local authority through rates. It is therefore recommended that the economic development objectives are amended to permit the ability to recognise the level of potential economic contribution of renewable energy schemes to the local economy.
- The Draft Plan does not include policies to provide for the repowering and extension of existing renewables schemes. Section 8.2.6 acknowledges that there are 3 existing windfarms within the county (including Energia asset Drumlins Park) but does not specifically set out parameters or policy for the redevelopment of existing sites. Submission therefore advocates for the inclusion of a policy tailored to repowering or extension of existing renewables assets.
- There is a gap in relation to both policy and general guidelines for the co-location of such renewable technologies. On the point of renewable energy co-location developments, the plan provides no direct instruction either within the policy or guidance. Potential for co-location of renewable technologies has clear advantages over new site selection with the utilisation of land already in use for renewable energy and encourages development of key technologies essential to meeting energy demands such as energy storage systems. In order to guarantee a consistent supply of renewable energy increased utilisation of energy storage will be required which is ideally suited to co-location development
- Submission states that, while supportive of renewable energy in principle, the Draft Plan adopts a more cautious approach, particularly regarding local environmental impacts and community concerns. To better align with national goals, the plan would benefit from stronger commitments to renewable energy deployment, grid infrastructure development, and integration of new technologies
- In conclusion, the submission recommends that the Draft Plan is amended to:
 - Actively encourage the expansion of the grid network within the county to facilitate future renewable energy development.
 - Recognise through specific objective and policy support the role of emerging technologies such as BESS.
 - Make clear in the Development Plan proposed policies to facilitate extension to lifetime and repowering of existing wind farms.
 - Include policy to facilitate the co-location of renewables technologies.
 - Identify the operational Drumlins Park wind farm and consented Coolberrin Wind Farm in any Renewable Energy Strategy prepared during the course of the plan.

Chief Executive Response

The Development Plan recognises that reducing the county's carbon footprint and promoting energy-efficient development patterns are vital in efforts to combat climate change and notes that a favourable approach to renewable energy developments will be adopted. This is reflected within Objective REO 1 which seeks *'to support and advance the provision of renewable energy resources and programmes in line with the Government's National Energy and Climate Plan 2021-2030 and any new or updated/subsequent versions during the lifetime of this plan'* and Objective REO 3 which seeks *'to facilitate the sustainable development, renewal and maintenance of energy generation infrastructure in order to maintain a secure energy supply while protecting the landscape, archaeological and built heritage and having regard to the provisions of the Habitats Directive'*.

Additionally, the Draft Plan acknowledges the significant contribution wind energy can make to reducing greenhouse gas emissions and seeks to achieve a balance between enabling the wind energy resource of the County whilst responding to government policy on renewable energy. In the interest of proper planning and sustainable developments, applications for renewable energy proposals will be assessed having regard to normal planning considerations and the locational criteria applicable to other types of renewable energy developments.

Monaghan County Council acknowledges the importance of a Renewable Energy Strategy for supporting renewable energy. In respect of the preparation of a Renewable Energy Strategy for the County and also noting the recommendation of the OPR (submission MN-C22-MCDP-126), Objective REO 2 in Chapter 8 - Environment, Energy, and Climate Change is proposed to be amended to commit to the preparation of a Renewable Energy Strategy for the County, within a specified timeframe as set out below. Furthermore, it is proposed to include three additional objectives to ensure the security of energy supply and provide for future needs.

Chief Executive Recommendation

It is recommended that Objective REO2 in Chapter 8 Environment Energy and Climate Change is amended and that following objectives are also included, REO 10, 11 and 12:

Renewable Energy Objective	
REO 2	To prepare a Renewable Energy Strategy for the County over the lifetime of this plan and subject to the availability of resources <i>within one year of the publication and adoption of the publication of the Methodology for Local Authority Renewable Energy Strategies or the Regional Renewable Electricity Capacity Allocations for the Northern and Western Region, whichever is sooner.</i> Such a Strategy shall be shaped and informed by environmental considerations, constraints and sensitivities relevant to the Plan Area-including biodiversity, European sites, and landscape and visual amenity related designations.
REO 10	<i>Support the sustainable development, upgrading and maintenance of energy, generation, transmission, storage and distribution infrastructure, to ensure the security of energy supply and provide for future needs, as well as protection of the landscape, natural, archaeological and built heritage, and residential amenity.</i>
REO 11	<i>Support and facilitate proposals for secure, appropriately scaled energy storage systems and infrastructure, including green hydrogen gas storage which support energy efficiency and reusable energy systems, provided such proposals have regard for health and safety and accord with the principles of proper planning and sustainable development of the area.</i>
REO 12	<i>Support and facilitate proposals for hybrid energy systems and/or co-location of renewable energy where applicable where such development has satisfactorily demonstrated that it will not have adverse impacts on the surrounding environment.</i>

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-101</u>	Heritage Officer	Monaghan Town	N/A

Summary of Submission & Issues Raised

- This submission states that Monaghan County Council were awarded funding for the Heritage Council' s Historic Towns Initiative for a Heritage Led Regeneration Plan for Monaghan Town.
- Following widespread consultation and engagement, a Heritage Led Regeneration Plan for Monaghan Town has been developed and has been presented to Monaghan Municipal District and the Senior Management Team.
- This submission requests that the new County Development Plan take cognisance of this Heritage Led Regeneration Plan for Monaghan Town and that the text of the Development Plan be amended to reflect its existence.
- The submission states that many of the actions and proposed policies align with the County Development Plan as it currently stands but that it is important that this document is referred to and recognised within the County Development Plan.
- Section 9 of the Heritage Led Regeneration Plan for Monaghan Town contains a number of discrete actions including some that are already included within the Draft Plan, such as a review of the Architectural Conservation Areas and the Record of Protected Structures as well as recommending the development of a shopfront strategy and a design palette for the town
- Other actions refer to specific buildings, monuments or streets and are intended to focus and prioritise funding towards specific projects which can be funded through the Heritage Council or other funding schemes.
- Another aspect of the plan are the proposed policies in Section 8 of the Heritage Led Plan all of which are standard best practice when dealing with a historic town as well as dealing with recording and specialist advice and the loss of historic fabric and proposed alterations within Architectural Conservation Areas or the historic core of the town.

Chief Executive Response

In addition to the objectives and policies contained within Chapter 6 of the Draft Development Plan, Chapter 10 specifically acknowledges the architectural interest of Monaghan Town.

The Historic Towns Initiative is a joint undertaking by the Department of Housing, Local Government and the Heritage Council which aims to promote the heritage-led regeneration of Ireland's historic towns and villages to improve their quality for residents and visitors.

Monaghan Town Historic Towns Initiative Report is a positive road map for the successful heritage led regeneration of Monaghan, helping it to fulfil its potential as a historic town. This plan focusses on the historic core of Monaghan and aims to enhance the streets, buildings and monuments that make up the unique character of Monaghan town. The plan suggests a number of actions which draw on Monaghan town's heritage assets and offers guidance on its future growth.

This Plan was adopted by the Elected Members in November 2024.

It is therefore considered reasonable to reference this plan within Chapter 10 – Monaghan Town Settlement Plan.

Chief Executive Recommendation

That the following text is inserted into Section 10.13

10.13 Built Heritage

Monaghan Town has a wealth of buildings of architectural interest. The present layout of Monaghan Town is striking in its unconventional triangular branching from the centre. The town centre consists of a series of four urban spaces of quite different character, Market Square, Church Square, Old Cross Square and the Diamond. The open space of the Diamond, with the Rossmore Memorial at the centre provides the main focus of the town. The prevalence of softly rounded corners on buildings is one of the most striking and unique features of the town's architecture, a feature to be repeated in the redevelopment of corner sites. Another interesting architectural feature is the arch, a typical feature of the town's buildings. Both the open arch and the arch incorporated into the wall, the arch at first floor level and segmented arches at ground level are all worthy architectural features. The streetscape is characterised by a narrow plot width with buildings of two and three storeys forming narrow wedges along a uniform building line.

Monaghan Town Historic Towns Initiative Report was adopted by the Monaghan Municipal District Elected Members in November 2024 and is a positive road map for the successful heritage led regeneration of Monaghan, helping it to fulfil its potential as a historic town. This plan focusses on the historic core of Monaghan and aims to enhance the streets, buildings and monuments that make up the unique character of Monaghan town. The plan suggests a number of actions which draw on Monaghan town's heritage assets and offers guidance on its future growth. Where relevant, regard shall be given to the report, however in the event of any conflict or ambiguity between the documents, the objectives and policies contained within the Development Plan shall take precedence.

There are eleven Architectural Conservation Areas (ACAs) within Monaghan Town as indicated in Table 6.9 of Chapter 6 of the Monaghan County Development Plan 2025-2031. Within ACAs the repair and refurbishment of existing buildings will be favoured over demolition and new build. New development should be sympathetic in scale, massing and detailed design to the existing character of the area. Guidance in relation to new development/works situated within an ACA is provided in Chapter 15 Development Management Standards of the Monaghan County Development Plan 2025-2031.

A list of Protected Structures located within Monaghan Town is contained in Appendix 1 of the Monaghan County Development Plan 2025-2031.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-110</u>	EDF Renewables (EDFR)	N/A	N/A

Summary of Submission & Issues Raised

- EDFR is part of one of the world’s largest electricity companies and our investment and innovation in renewable energy projects is bringing down costs for consumers and delivering significant benefits for communities.
- EDFR welcomes the First Draft Revision National Planning Framework and supports the Government’s strategy for developing the National plan for Ireland out to 2040 and beyond. The plan will play a key role in Irelands’ response to the Climate and Biodiversity emergency and in our ambition to achieve the Climate Action Plan (CAP) targets by 2030.
- It is crucial that the Development Plan (CDP) not only provides policy support for additional wind energy and other renewable electricity resources, but that its policies and objectives are internally consistent and will facilitate the implementation of appropriate additional wind energy infrastructure within the County.
- Our primary concern with the CDP is that the Draft Plan should not restrict the ability of Monaghan to achieve its renewable energy targets (and, by extension, should not restrict the County, Region and Nation from reaching their climate change targets, policies and objectives). To address this, it is requested that Monaghan County sets an ambitious climate action and renewable energy policy framework as part of the drafting of the CDP 2025-2031.

Our detailed observations, concerns and recommendations for the CDP are as follows:

European and National Legislation – The National Planning Framework sets out that the overarching EU Legislation relating to ‘Accelerating Renewables’ and reducing reliance on fossil fuels. These will require Member States to adopt and implement them into national policies and regional strategies. The European Commission’s REPowerEU Plan, “seeks to support the expansion of renewable infrastructure through a number of measures, such as streamlining the permitting processes for wind and solar projects and specific arrangements for the repowering of existing installed capacity”. In addition, the recast Renewable Energy Directive III (“RED III”) requires Member States to identify “renewables acceleration areas”. The RED III has spatial implications in relation to where renewable energy developments can be prioritised for delivery. European Legislation is welcomed into Irish Policy and into Regional and County level plans, and specifically for the allocation of renewables acceleration areas within the Renewable Energy Strategy to be prepared in accordance with Renewable Energy Objective 2 (REO2) of the CDP.

Local Climate Action Plans – It should be noted that Local Authorities are required to prepare individual Climate Action Plans (CAP) that are updated every five years, and these must be aligned with their CAP.

Renewable Energy Strategy - Chapter 8, section 8.2 of the CDP sets out an overview of the Renewable Energy Strategy within County Monaghan. This strategy aims to “promote and support the diversification of the energy sector in accordance with EU, National and Regional policy and the provisions of the Monaghan Local, Economic and Community Plan (LECP) 2023 – 2029” to achieve “The realisation of National targets...at local level” through its Renewable Energy Objectives. The guidance provided under Section 15.17 of the CDP in relation to encouraging renewable energy proposals at suitable locations is welcomed.

Renewable Energy Objectives – It is noted that Objectives for Renewable Energy in Chapter 8, section 8.2, *Energy* (p.188), the CDP supports the practical delivery of this commitment by enabling appropriate development of renewable generation through the recommended arrangements set out

in the preceding points. The Renewable Energy Objectives, as set out on pages 193 and 194, REO1 – REO9 are welcomed.

- **Sufficient Flexibility for Wind Energy Development** - It is requested that MCC provides sufficient flexibility surrounding the development of wind energy in order for both Monaghan and the Country as a whole to successfully meet the Government's overarching targets of 9 GW of onshore wind, 5 GW of offshore wind and 8 GW of solar by 2030, as well as supporting at least 500 MW of local community-based renewable energy projects and increased levels of new micro-generation and small-scale generation by 2030.

- **Site-specific opportunities for Wind Energy** - Request that MCC is mindful of EU and national renewable energy policies and targets and is not overly restrictive in the development of the Renewable Energy Strategy referred to in REO 2. Request that MCC facilitates the implementation of wind energy at the scale required by allowing individual projects the opportunity to prove their suitability in accordance with Section 15.17 of the CDP, through site specific and targeted Environmental Impact Assessment (EIA) and Appropriate Assessment (AA) processes and that this option is incorporated in the CDP. In this site-specific opportunity, the onus is placed on the project and any prospective applicant to prove the suitability of any proposed development to the Planning Authority based on its merits, but without being deemed unacceptable in advance due to a strict application of strategic level policy constraints, which may not be applicable to a site-specific review.

To provide an example, Ireland's largest Onshore Wind Farm, Galway Wind Park, is sited in an environmentally sensitive area, within Connemara Bog Complex Special Area of Conservation (SAC) to the west and Special Area of Conservation (SPA) to south, Oughterard District Bog Natural Heritage Area (NHA) to the east and Margaritifera Sensitive Area (SA) to the North. This wind farm is fully operational and has had negligible environmental effects on the surrounding area, despite its location in close proximity to environmentally sensitive areas. This is a great example of a successful large-scale renewable energy project which can co-exist with the local environment, without presenting a negative visual impact on the surrounding area, due to careful planning of the site.

- **Support for Wind Energy Development** - It is requested that MCC allows for potential wind energy development sites throughout the County to be assessed based on the merits of a site on a case-by-case basis, rather than an overarching restriction based on the high-level implementation of constraints (which could result in an overly precautionary outcome). Designating large areas as being unsuitable due to the application of broad-brush strategic level constraints can severely limit the site selection process, reduce the ability to meet national targets and can also artificially restrict highly suitable development sites from being brought forward. The EIA and AA processes have proven effective and robust in demonstrating that sites at a project level are in accordance with the principles of land use planning and sustainable development, while ensuring significant environmental effects are avoided. It is requested that MCC builds in the provision for developments to be assessed on the merits of their individual applications, rather than making blanket designations for large areas.

- **Co-location** - There are many benefits for local Communities associated with renewable energy projects, including job creation, revenue generated through commercial rates, and Community Benefit Funds (CBFs). The opportunities to work together with communities to find workable solutions where every party can benefit and where the activities can be carried out in a sustainable and environmentally sensitive manner. To support the concept of co-location between renewable energy projects and other land-uses such as agricultural activities that supports both a reduction in carbon emissions and land-use diversification options for farmers in line with the carbon budget programme and the Climate Action Plan. This can have significant economic development opportunity for rural and coastal communities.

• **Climate Emergency** - EDFR welcomes the commitment of the Council to facing the challenges of the Climate Emergency as set out in the Draft CDP 2025-2031 and note that the Council remains supportive of all forms of renewable energy development in line with the Government's overarching strategy and climate goals for 2030 and beyond. In support of this commitment, it is believed that a range of renewable energy technologies will be necessary to meet our 2030 climate targets and beyond. Monaghan has a strong renewable energy resource. It is important that the appropriate use of this low carbon resource is enabled by the CDP, combined with supportive policies for renewables.

Considering the factors set out above, it is requested that the following actions are taken in the finalisation of the CDP 2025-2031 by MCC:

- To implement greater flexibility within the CDP through the development of a comprehensive Renewable Energy Strategy that is mindful of EU and national renewable energy policies and targets and is not overly restrictive. This will provide policy support for renewable energy development projects which can demonstrate that they are suitable and appropriate, in terms of all relevant environmental sensitivities, through the EIA and AA processes.
- To update its policy objectives to ensure that the onshore grid infrastructure necessary to facilitate both on and offshore renewable energy development is directly referenced and supported, subject to appropriate design measures being implemented.

Through these steps, MCC will actively demonstrate its support and facilitation of the transition to a low carbon society over the lifetime of the CDP 2025-2031.

In conclusion, it is considered that due to the restrictions arising from the current versions of the Draft Monaghan CDP 2025-2031, it will be difficult, if not impossible, for Monaghan to achieve its strategic goals surrounding renewable energy. It is requested that MCC sets an ambitious climate action and renewable energy policy framework within the future CDP with arrangements that enable appropriate renewable energy development.

Chief Executive Response

The comments put forward by EDF Renewables are noted. It is acknowledged that MCC does not currently have a Renewable Energy Strategy, and a clear objective in the Draft Plan at REO 2 is to undertake this during the lifetime of the plan. However, to provide greater certainty going forward it is agreed that this Strategy should be undertaken within a specified timeframe. As a Council the importance and the necessity for renewable energy going forward is noted. Any Strategy prepared by the Council will be mindful of EU and national renewable energy policies and targets, ensuring that all projects demonstrate they are suitable and appropriate in terms of environmental sensitivities through the EIA and AA process and in accordance with Chapter 15 of the CDP.

A Renewable Energy Strategy will address onshore grid infrastructure in the County and shall set clear requirements, including design measures to facilitate these types of developments. An additional objective to support this has been added below.

The Renewable Energy Strategy will set out a Framework which will work in conjunction and in support of the Council's Climate Action Plan Framework (2024-2029) which is aligned to the Government's National Climate Objective. The current objectives set out in the current draft CDP are not restrictive, and it should be noted that a number of additional renewable energy objectives are recommended in this report.

Chief Executive Recommendations

The following change is recommended.

1. At Chapter 8 Environment Energy and Climate Change, Section 8.2.11 titled Passive Housing, within this section at objective REO 2 add the red text as follows with the deletions in black with a strike through and in addition add a new objective REO 10 as follows:

Renewable Energy Objective	
REO 2	To prepare a Renewable Energy Strategy for the County over the lifetime of this plan and subject to the availability of resources <i>within one year of the publication and adoption of the publication of the Methodology for Local Authority Renewable Energy Strategies or the Regional Renewable Electricity Capacity Allocations for the Northern and Western Region, whichever is sooner.</i> Such a Strategy shall be shaped and informed by environmental considerations, constraints and sensitivities relevant to the Plan Area-including biodiversity, European sites, and landscape and visual amenity related designations.
REO 10	<i>Support the sustainable development, upgrading and maintenance of energy, generation, transmission, storage and distribution infrastructure, to ensure the security of energy supply and provide for future needs, as well as protection of the landscape, natural, archaeological and built heritage, and residential amenity.</i>

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-114</u>	Conroy Gold and Natural Resources PLC c/o SLR Environmental Consulting (Ireland) Ltd	N/A	N/A

Summary of Submission & Issues Raised

- The submission notes that the draft plans remains broadly consistent with previous county development plans and that it remains supportive of the extractive industry whilst recognising the balance with environmental and social matters.
- The authors note however that Section 15.18 and in particular part ‘b’ of the Draft Plan appears confusing.
- The wording of section 15.18 states *“Proposals for extractive industry shall normally be resisted in the following circumstances: b) Where it is located in close proximity to existing extractive sites of significant resource potential and such developments would limit future exploitation of the existing extractive site.”*
- Authors suggest that the above wording implies that there is some form of a resource sterilisation concern solely when locating proposed extractive industry next to existing extractive industry, although it caveats that such development could go ahead if it won’t limit the resource exploitation.
- The submission states that in practice, much of the extractive industry in Ireland operates by locating extractive industry adjacent to existing extractive industry through extension planning applications where a site extends their development vertically or laterally. This allows continued exploitation of the geological resource rather than sterilization to occur
- The current Monaghan County Development Plan 2019 – 2025 includes the following policy EIP 3 – *‘To restrict development proposals located in close proximity to existing extractive sites of significant resource potential where such developments would limit future exploitation’*, whilst the previous Monaghan County Development Plan 2013 – 2019 provided: EIP 6 – *‘Restrict other development in the neighbourhood of existing extractive sites or sites which have significant resource potential, where such developments would limit the future exploitation’*.
- The author contends that the proposed wording may have been an inadvertent evolution between current and proposed plans and requests that the following wording be updated and included within the development plan *‘Restrict other development in the neighbourhood of existing extractive sites or sites which have significant resource potential, where such developments would limit the future exploitation’*.
- The submission concludes that revised wording would provide better protection of both existing extractive sites and include recognition of unexploited geological resources - as has been recognised in previous plans.

Chief Executive Response

The County Development Plan acknowledges that mineral reserves are processed at many locations across County Monaghan. It also recognises that these significant natural resources make an important contribution to the local economy and acknowledge that they should be safeguarded for future use as reflected in Objective MEO 1 which seeks *‘to promote developments involving the extraction of mineral reserves and their associated processes, where such developments are carried out sustainable manner that does not adversely impact on the environment or on other land uses’*.

By their nature, aggregates can only be worked where they occur, and it is acknowledged that there will be a continuing need for some new or expanded aggregate quarrying operations on land to meet

regional and local requirement and therefore it is important to safeguard sites of significant resource potential from other developments as opposed extractive industry developments which would limit/prevent future exploitation.

Mineral extraction, such as working with stone, sand and gravel, can however generate environmental capacity problems for the surrounding areas and therefore it is also considered important to ensure that impacts on the environment and communities from such developments are acceptable

Chief Executive Recommendations

It is recommended that Section 15.18, Extractive Industry, in Chapter 15, Development Management Guidelines, is amended as follows:

Any application for an extractive industry shall have regard to the Quarrying and Ancillary Activities, Guidelines for Planning Authorities (DEHLG 2004), Guidelines for Environmental Management in the Extractive Industry (EPA, 2006), Guidelines on Biodiversity in the Extractive Industry (NPWS), Geological Survey of Ireland Geological Heritage Guidelines for the Extractive Industry (2008), the Archaeological Code of Practice (2009) and the Architectural Heritage Protections Guidelines for Planning Authorities (DAHG, 2011) and any new or update/subsequent documents.

In recognition of the important contribution extractive industries make to the local economy, development proposals located in close proximity to existing extractive sites or sites which have significant resource potential, will be resisted where such development would limit the future exploitation of these sites.

Proposals for extractive industry shall normally be resisted in the following circumstances:

- a) Where it is located within an Area of Primary or Secondary Amenity, Special Protection Area, Special Area of Conservation, Natural Heritage Area or Proposed Natural Heritage Area, Architectural Conservation Area or on or near protected structures, recorded monuments and places, unless in exceptional circumstances where the Planning Authority is satisfied that the need for the resource outweighs the environmental impact.
- b) Where it is located in close proximity to existing ~~extractive sites of significant resource potential and such developments would limit future exploitation of the existing extractive site~~ **developments where potential sources of nuisance are considered to be incompatible.**
- c) Where it may have a detrimental impact on the natural or built environment or matters of acknowledged public importance.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-117</u>	Local Link Cavan Monaghan	N/A	N/A

Summary of Submission & Issues Raised

Submission No.MN-C22-MCDP-117 raises the following request:

- Replace text in Draft Plan with extract in the submitted introduction
- Address challenges faced with the public- bus lanes and bus priority to make the modal shift,
- Local Transport Plan process to consider a public transport town centre hub
- Make Active Travel and Public Transport a collaborative
- Bus stop infrastructure and permeable active travel solutions by NTA
- Prove bus stop and shelter infrastructure on either side of the roundabout on the N12 Armagh Road Stop Infrastructure for (Monaghan Institute and M-Tek campuses)

The submission is summarised as follows:

Introduction

- The National Transport Authority is responsible for the Rural Transport Programme/TFI Local Link
- TFI Local Link is managed and administered nationally by 15 Transport Co-ordination Units who are operating on behalf of Transport for Ireland (TFI)
- TFI Local Link operate two different types of service: Regular Rural Bus Services and Door-to-Door Bus Services
- Regular Rural Bus Services operate on a fixed route between towns and villages and have a scheduled timetable, just like any other public transport bus service
- Door to Door Services are route-based services with the added benefit of collecting and dropping off passengers directly at their homes
- TFI Local Link Cavan Monaghan (Cavan Monaghan TCU CLG) have responsibility for the geographic area of Cavan Monaghan.

Observations

- Below is extract from the draft plan, it is proposed to revise this extract using the introduction above.

‘Cavan Monaghan Transport Co-ordination Unit, also known as Local Link Cavan Monaghan (Local Link), was established in 2014 as part of the National Restructuring Programme by the NTA. It replaces Cavan’s ‘CART’ and Monaghan’s ‘BALTI’ local service bus schemes. The CMTCU currently operate approximately 70 services in the Cavan/Monaghan region. Services operate at various frequencies across the two counties. A door-to-door collection is provided, and the service can cater for wheelchair users and those with impaired mobility. The services are designed to provide access to a range of public services including transport, finance, and health and shopping. The services are operated by private operators on behalf of Local Link. Local Link also work on behalf of state agencies in the area to manage and co-ordinate transport on their behalf. The Local Link provides an invaluable support service to individuals without access to a private car or who live in remote or isolated locations.’

- TFI Local Link Cavan Monaghan play a key role in contributing to delivery of government policy, under the NPF, NDP, Sustainable Mobility Policy and Climate Action.
- The provision of Rural Regular Services in County Monaghan provides viable alternatives to private car usage across the county, operating multiple times per day, seven days per week.

Route No Towns and Villages served

MN 1 Knockatallon, Tydavent, Scotstown, Ballinode, Monaghan Town

MN 2 Castleblayney, Doohamlet, Ballybay, Ardagh, Beachgrove, Monaghan Town
 MN 3 Mullan, Carrickroe Emyvale, Glaslough, Tyholland, Monaghan Town, Killyconnigan
 176 Scotshouse, Clones, Newbliss, Threemilehouse, Monaghan
 171 Shercock, Carrickmacross, Inniskeen, Dundalk

- In 2023, these services carried over 350,000 passengers in Monaghan, in daily terms this represents almost 1000 people per day using public transport in the county.

Below shows the growth in usages on Monaghan based Local Link services

Year	2019	2020	2021	2022
Passengers	99212	109213	212445	317035

Challenges faced by Public Transport

- In an ideal world, bus lanes and bus priority would be in all major urban centres, for people who decide to use public transport, it would be a further incentive for others to make the modal shift, if there was an advantage to being on a bus when it comes to traffic queues.
- It is encouraged that through the Local Transport Plan process, the consideration to a public transport town centre hub, a location that facilitates two-way traffic and where the opportunity then exists, for services timing to connect allowing passengers better options to switch between services for onward travel.
- Active Travel and Public Transport go hand in hand, therefore planning of Active Travel measures and public transport should be a collaborative process where possible.
- The NTA have responsibility for bus stop infrastructure, however creation of permeable active travel solution to urban settlements may be worth exploring in order to give people access to public transport, where buses are unable to route through.

N12 Armagh Road Stop Infrastructure

- The Monaghan Institute and M-Tek campus are a major demand destination for the service, however, it would be preferential to have bus stop and shelter infrastructure on either side of the roundabout on the N12.

Chief Executive Response

This submission requests a public transport town centre hub, collaboration in the planning of active travel measures and public transport and specifically requests bus stop facilities for Monaghan Institute/Active Travel on the N12.

Chapter 7 Transport and Infrastructure of the Monaghan County Development Plan 2025-2031 includes specific objectives and policies in Section 7.4 Active Travel and Recreational walking and cycling and Section 7.5 Public and Shared Transport to address this submission.

Policy PTO 4 of Section 7.5 Public and Shared Transport makes provision for bus facilities on the N12 *“Support the creation of safe and appropriately located bus stops and ancillary facilities along the road network and make provision for the safe and effective use of those facilities by passengers and bus service operators”*.

However, in response to this submission, it is proposed to amend the wording of the introductory text on Local Link, and minor amendments to the wording of Section 7.4 Active Travel and Recreational walking and cycling and Section 7.5 Public and Shared Transport, as set out below.

Chief Executive Recommendations

The following is recommended:

- Replace Extract below from the draft plan,
‘Cavan Monaghan Transport Co-ordination Unit, also known as Local Link Cavan Monaghan (Local Link), was established in 2014 as part of the National Restructuring Programme by the NTA. It replaces Cavan’s ‘CART’ and Monaghan’s ‘BALTI’ local service bus schemes. The CMTCU currently operate approximately 70 services in the Cavan/Monaghan region. Services operate at various frequencies across the two counties. A door-to-door collection is provided, and the service can cater for wheelchair users and those with impaired mobility. The services are designed to provide access to a range of public services including transport, finance, and health and shopping. The services are operated by private operators on behalf of Local Link. Local Link also work on behalf of state agencies in the area to manage and co-ordinate transport on their behalf. The Local Link provides an invaluable support service to individuals without access to a private car or who live in remote or isolated locations.’

With this Extract, as submitted:

‘The National Transport Authority is responsible for the Rural Transport Programme/TFI Local Link. TFI Local Link is managed and administered nationally by 15 Transport Co-ordination Units who are operating on behalf of Transport for Ireland (TFI).

TFI Local Link operate two different types of service; Regular Rural Bus Services and Door-to-Door Bus Services. Regular Rural Bus Services operate on a fixed route between towns and villages and have a scheduled timetable, just like any other public transport bus service. Door to Door Services are route-based services with the added benefit of collecting and dropping off passengers directly at their homes.

TFI Local Link Cavan Monaghan (Cavan Monaghan TCU CLG) have responsibility for the geographic area of Cavan Monaghan’.

- Amend Section 7.4 Active Travel and Recreational walking and cycling to include:
 - Policy ATP 6: Where appropriate, make provision for other infrastructure ancillary to Greenways, Active Travel routes or recreational walking/cycling facilities to increase the attractiveness of Active Travel, to improve user experience, or to connect with public transport services.
 - Policy ATP 8: To plan for and develop, in co-operation and consultation with adjoining local authorities and cross border bodies, active travel infrastructure and greenways networks to connect main urban centres and public transport services throughout central Ulster Region.
- Amend Section 7.5 Public and Shared Transport as follows:
 - PTO 3: Provide and co-ordinate with ancillary public transport infrastructure, including active travel infrastructure, that enhances and improves user experience and comfort, thereby creating an environment where people are encouraged and supported to make a modal shift toward sustainable, low-carbon travel options for everyday journeys.
 - PTO 5: Support the development of an integrated public transport service through the development of bus depots and hubs, bus parking or bus waiting areas in appropriate locations and where a need has been identified
 - New Policy: PTO 12: To require that facilities to support public transport services are provided for in the development of new or expanding institutions, employment centres, sports complexes, and leisure facilities, including bus stops, bus shelters and bus turning areas as appropriate.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-118</u>	Roadstone Ltd c/o SLR Environmental Consulting (Ireland) Ltd	N/A	N/A

Summary of Submission & Issues Raised

- The submission notes that Roadstone Ltd are supportive of Monaghan County Council and its work to further a spatial planning framework for the future growth of County Monaghan.
- Roadstone Ltd as landholders of a strategic landbank, would encourage the Local Authority to review the wording of Chapter 15.18 to safeguard the extractive industry to ensure the supply of aggregates and construction materials in the County of Monaghan, in line with National Policy.
- The National Planning Framework and the Draft National Planning Framework, states 'Extractive industries are important for the supply of aggregates and construction materials and minerals to a variety of sectors, for both domestic requirements and for export. The planning process will play a key role in realising the potential of the extractive industries sector by identifying and protecting important reserves of aggregates and minerals from development that might prejudice their utilisation'.
- Submission includes extracts from the existing Monaghan County Development Plan 2019-2025 and the Draft Monaghan County Development Plan with respect to the extractive industry.
- Submission notes that the Draft Plan is generally supportive of the extractive industry and acknowledges the critical role minerals have in assisting job creation and the transition to a circular economy within the County and acknowledges that the draft policies and objectives promote development of the extractive industry and aim to safeguard all identified locations of major mineral deposits in the County for future extraction.
- The author notes that although the Draft Plan mirrors the importance of the extraction industry as set out in national policy and the Monaghan County Development Plan 2019-2025., there is a key change to the wording of Policy EIP3 of the Monaghan County Development Plan 2019-2025, which is of concern.
- The current Monaghan County Development Plan 2019 – 2025 includes the following policy EIP 3 – 'To restrict development proposals located in close proximity to existing extractive sites of significant resource potential where such developments would limit future exploitation', whilst the draft policy EIP1 states 'Proposals for extractive industry shall normally be resisted in the following circumstances.....b) Where it is located in close proximity to existing extractive sites of significant resource potential and such developments would limit future exploitation of the existing extractive site'.
- Author contends that the removal of the text, 'development proposals' from the policy, seems to imply that any application for extraction will be resisted where it is in close proximity to existing extractive sites, as opposed to the 2019 CDP where it was understood that 'development proposals' in close proximity to existing extractive sites would be resisted.
- Monaghan County Council has acknowledged the importance of the extractive industry to the County and the critical need to protect these important resources. Quarries provide essential raw materials from which future infrastructure and housing will be built. These aggregates can only be accessed where they occur and must be permitted to expand as the resources allow. They must be protected from development which could limit future exploitation.
- Submission requests that Policy EIP1 reverts back to the wording of the 2019-2025 Monaghan County Development Plans 'To restrict development proposals located in close proximity to existing extractive sites of significant resource potential where such developments would limit future exploitation'.

Chief Executive Response

The County Development Plan acknowledges that mineral reserves are processed at many locations across County Monaghan. It also recognises that these significant natural resources make an important contribution to the local economy and acknowledge that they should be safeguarded for future use as reflected in Objective MEO 1 which seeks *“to promote developments involving the extraction of mineral reserves and their associated processes, where such developments are carried out sustainable manner that does not adversely impact on the environment or on other land uses”*.

By their nature, aggregates can only be worked where they occur, and it is acknowledged that there will be a continuing need for some new or expanded aggregate quarrying operations on land to meet regional and local requirement and therefore it is important to safeguard sites of significant resource potential from other developments as opposed extractive industry developments which would limit/prevent future exploitation.

Mineral extraction, such as working with stone, sand and gravel, can however generate environmental capacity problems for the surrounding areas and therefore it is also considered important to ensure that impacts on the environment and communities from such developments are acceptable

Chief Executive Recommendation

It is recommend that Section 15.18, Extractive Industry, in Chapter 15, Development Management Guidelines, is amended as follows:

Any application for an extractive industry shall have regard to the Quarrying and Ancillary Activities, Guidelines for Planning Authorities (DEHLG 2004), Guidelines for Environmental Management in the Extractive Industry (EPA, 2006), Guidelines on Biodiversity in the Extractive Industry (NPWS), Geological Survey of Ireland Geological Heritage Guidelines for the Extractive Industry (2008), the Archaeological Code of Practice (2009) and the Architectural Heritage Protections Guidelines for Planning Authorities (DAHG, 2011) and any new or update/subsequent documents.

In recognition of the important contribution extractive industries make to the local economy, development proposals located in close proximity to existing extractive sites or sites which have significant resource potential, will be resisted where such development would limit the future exploitation of these sites.

Proposals for extractive industry shall normally be resisted in the following circumstances:

- a) Where it is located within an Area of Primary or Secondary Amenity, Special Protection Area, Special Area of Conservation, Natural Heritage Area or Proposed Natural Heritage Area, Architectural Conservation Area or on or near protected structures, recorded monuments and places, unless in exceptional circumstances where the Planning Authority is satisfied that the need for the resource outweighs the environmental impact.
- b) Where it is located in close proximity to existing ~~extractive sites of significant resource potential and such developments would limit future exploitation of the existing extractive site~~ **developments where potential sources of nuisance are considered to be incompatible.**
- c) Where it may have a detrimental impact on the natural or built environment or matters of acknowledged public importance.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-123</u>	Stream BioEnergy Ireland Limited submission by McCutcheon Halley Chartered Planning Consultants	N/A	N/A

Summary of Submission & Issues Raised

- Stream BioEnergy Ireland Limited is a biogas development and operation company who deliver infrastructure to process organic waste in Ireland and the UK. As part of a vision for an improved, safer, more secure and sustainable clean energy future, Stream BioEnergy promotes the use of anaerobic digestion (AD) technology to convert organic materials into renewable energy and nutrient-rich biofertiliser in a way that safeguards the environment, delivering a more secure and sustainable clean energy future.
- Submissions highlights a number of recommendations which should be integrated into the Development Plan to ensure full alignment with Ireland’s obligations under European law while also effectively supporting the development of renewable energy infrastructure, creating employment opportunities, and contributing to the transition towards a more sustainable and circular economy in County Monaghan.

Policy Context

- Submission states that it is essential that European and higher-order planning policies are reinforced within the development plan to provide a strong framework for decision-making and also to ensure that stakeholders, including developers, local communities, and other interested parties, understand the rationale behind the inclusion of specific policies on renewable energy and the circular economy. The submission states that by embedding these priorities into the Development Plan, the Council will demonstrate its commitment to supporting European and National environmental and renewable energy goals.
- It is contended that clarifying these mandates within the MCDP also provides important certainty for development management, ensuring that public and private sector stakeholders can confidently plan and invest. Submission notes that this certainty is particularly valuable as the County works towards achieving the State’s renewable energy targets, supporting sustainable economic growth, and contributing to the broader climate action objectives.

European Policy

- The submission states that the development plan must be structured to align with and respond to the requirements of these legally binding frameworks. In this regard, policy should actively support the transition to sustainable energy solutions, ensuring that development aligns with national and European climate and environmental goals.
- REPower EU is a package of legislative proposals, policy papers, and best practice & guidance documents published by the European Commission (EC) in response to the impact on Europe of the war in Ukraine. The measures are designed to: (i) diversify energy sources away from Russian fossil fuels, and (ii) accelerate clean energy transition by speeding up delivery of renewable energy in the EU.
- By July 2025, Member States are expected to have made significant progress in scaling up biomethane production and integrating it into energy systems, particularly for use in transport and industry.
- Submission notes that whilst biomethane production has been scaled up significantly across European, it remains in the early stages of development in Ireland. Currently Ireland has only two operational biomethane facilities injecting biomethane into the gas grid.

- The European Green Deal (EGD) 2020/0036(COD) aligns with the legally binding Paris Agreement objective to keep the global temperature increase to well below 2°C and pursue efforts to keep it to 1.5°C.
- In September 2024, the European Commission issued guidance for EU Member States on implementing domestic measures to accelerate the deployment of renewable energy. The guidance pertains to the revised Renewable Energy Directive (2023/2413/EU), commonly known as RED III. This directive, which came into effect in November 2023, aims to fast-track the EU's green transition and reduce energy dependence in the wake of the Russia-Ukraine conflict in 2022. RED III sets an ambitious EU-wide target of 42.5% renewable energy consumption by 2030, a substantial increase from the 32% target under RED II. This timeline is important as it aligns with the forthcoming Monaghan County Development Plan 2025-2031. To achieve this, the Directive introduces a range of new requirements across various sectors and technologies, many of which were to be implemented by 1 July 2024.
- RED III's biomethane measures are part of the EU's broader strategy to decarbonise the energy sector, reduce reliance on fossil fuels, and meet renewable energy targets for 2030. RED III seeks to establish biomethane as a key renewable energy resource in the EU's green transition by creating the right incentives and frameworks.
- Specific measures have been introduced to promote biomethane as a key component of the EU's renewable energy strategy. These measures aim to increase the production and use of biomethane, contributing to the EU's renewable energy targets and reducing dependency on fossil fuels, particularly natural gas. The key provisions related to biomethane under RED III are listed as follows:
 - Biomethane Binding Target - RED III sets a binding EU target for the production of biomethane, aiming to significantly increase its share in the energy mix by 2030. Biomethane is seen as a crucial alternative to natural gas.
 - Sustainability Criteria — Biomethane must meet specific sustainability criteria to qualify for support under renewable energy targets. This includes requirements to ensure that biomethane production does not result in significant negative environmental impacts. The Directive includes provisions to promote the use of waste and residue materials for biomethane production, helping to minimise competition with food production and protect biodiversity
 - Support for Biomethane Infrastructure — Member States are encouraged to implement measures that will support the infrastructure necessary for the production, storage, and distribution of biomethane. This includes incentives for the building of biomethane plants and upgrading existing gas infrastructure to accommodate biomethane injection into the grid. To this end, Member States are expected to develop national action plans to facilitate biomethane deployment as part of their broader renewable energy strategies.
- A key requirement under RED III is the acceleration and simplification of permitting renewable energy infrastructure. Member States must ensure that the procedures for granting permits to build, repower, or operate renewable energy assets adhere to specific timelines based on the asset type, size, and location. This is expected to speed up both development and transaction timelines. However, Ireland did not meet the 1st of July 2024 deadline for transposing these provisions and, on the 26th of September 2024, received a formal notice from the European Commission. The Commission has requested that full transposition of the provisions be notified by late November 2024.
- Additionally, by 21 February 2024, Member States had to adopt a legal presumption that renewable energy projects are in the "overriding public interest" during environmental and planning assessments. Moreover, Member States are expected to take measures to protect biodiversity by promoting bioenergy. While many domestic measures are already in effect, the final deadline for full implementation of RED III is 21 May 2025.

- Submission therefore requests that the Monaghan County Development Plan recognises renewable energy projects as being of ‘overriding public interest’.
- The submission also requests that the Development Plan facilitates renewable energy production, storage and distribution infrastructure to meet legally binding international renewable energy commitments.

National Policy

- The submission notes that the policy landscape in Ireland is evolving quickly, driven by ongoing government support, infrastructure investment, and efforts to scale production in line with international climate commitments. The Draft Development Plan must align with national and regional planning frameworks, which are guided by national policies and guidelines designed to fulfil the State's binding European obligations.

National Planning Framework (NPF)

- The NPF notes the importance renewable energy will play in achieving the NSO ‘Transition to a Low Carbon and Climate Resilient Society and highlights the role of biogas power generation as a key planning and development priority.
- The submission notes that the NPF contains a number of National Policy Objectives which are aimed at increasing renewable energy generation, supporting the circular and bio economy and sustainable waste management.

Draft Revision of the National Planning Framework

- Submission notes that the revised text in Chapter 9 highlights the growing importance of the circular bio-economy to Ireland’s economic and sustainability objectives and also underscores biomethane’s crucial role, referencing the recently published National Biomethane Strategy, which sets a target of producing 5.7 TWh of indigenous biomethane by 2030.
- Submission welcomes references to the circular economy and bio-economy action plan in Section 8.2.7 of the Draft Plan.
- The submission recommends that the following objective and policy are included within the draft plan:
 - Objective: To support the transition to a low-carbon economy, enhance energy security, and meet Ireland’s national renewable energy targets, Monaghan will seek to maximise its potential for biomethane production. This will be achieved by supporting the development of biogas plants and associated infrastructure and collaborating with relevant stakeholders.
 - Policy: The Monaghan County Development Plan 2025-2031 promotes the development of biogas plants, to harness organic waste and agricultural residues for renewable energy production. The Council will work with local industry, agricultural stakeholders, and energy providers to ensure that the County’s potential for biomethane production is fully utilised.

Climate Action Plan 2024

- The Climate Action Plan 2024 (CAP24) has the objective of achieving indigenous production of 5.7 TWh of biomethane by 2030 from the target of 1.6 TWh in the CAP 2021.
- The poultry sector, like other livestock industries, contributes to GHG emissions, although it typically has a lower carbon footprint compared to ruminant livestock such as cattle or sheep. However, emissions from poultry farming are still significant, and understanding them is crucial for developing strategies to reduce the sector's environmental impact. One of the main sources of GHG emissions in the poultry sector comes from manure management.
- A baseline study of the poultry sector undertaken by Monaghan County Council in 2021 estimated that 255,217 tonnes of poultry manure is produced per annum, and of this, a

significant quantity is transported for land spreading outside Co. Monaghan, as far south as County Carlow. This transportation also contributes to CO₂ emissions.

- By diverting waste to a biogas plant, the organic materials are processed in an enclosed system which prevents the uncontrolled release of methane. Replacing fossil fuels with renewable energy generated in this manner also reduces GHG emissions. A biogas plant not only recovers energy from organic waste but also produces a nutrient-rich digestate that can be used as an organic fertiliser. The nutrients contained in digestate are more amenable to plant uptake than other organic fertilisers, and thus, its use has water quality and environmental and health benefits as it decreases organic pollution potential.
- CAP24 identifies key metrics to deliver abatement in agriculture and supports land use diversification options such as anaerobic digestion, which is listed as a metric.
- The draft MCDP includes a welcome narrative on CAP24, and it is positive that it incorporates the key performance indicators for carbon abatement, providing a clear and measurable target that those engaging with the Plan can rely on. However, the same approach is not applied to the CAP metrics for agriculture, and this should be addressed in the forthcoming MCDP.
- It is therefore recommended in line with the inclusion of key performance indicators (KPIs) for carbon abatement, that the next iteration of the MCDP adopt a similar, structured approach to the agricultural metrics. These metrics should be clearly defined, measurable, and aligned with the national targets, ensuring that agricultural practices in the county contribute effectively to carbon reduction goals and environmental sustainability.

National Biomethane Strategy

- The National Biomethane Strategy was published in May of this year and is the roadmap for implementing the targets set in the Climate Action Plan. It identifies that, in Ireland, there are currently only two operational biomethane facilities. The total volume produced is approximately 75 GWh per annum, which accounts for just 0.001% of Ireland's current gas demand. Achieving the targets presents a significant challenge and will require strong support at all levels of government and industry.
- The strategy outlines various feedstock inputs and provides estimates for biomethane production. This is particularly relevant given Monaghan's high concentration of intensive agricultural activities, which generate significant quantities of broiler litter, layer manure, spent mushroom compost, and other agricultural by-products that require off-site disposal. The draft MCDP acknowledges the important economic role these industries play in the county while also emphasising the critical need to safeguard the environment. Without a sustainable management approach, there is a risk that these industries could face significant restrictions.
- Submission notes that the Draft Plan restricts intensive agriculture, poultry and pig where they would result in an increase in ammonia and/or nitrogen emissions within 10km of a European Site (Natura 2000 site). Submission notes that their client operates a plant in Northern Ireland that successfully helps address nutrient management challenges, and which will support the viability of the poultry sector in Monaghan. Submission states that it is clearly in the Council's interest to ensure that every effort is made to support the delivery of this infrastructure in Monaghan.
- Submission recommends that in light of Monaghan's unique circumstances and the potential for achieving sustainable solutions through the National Biomethane Strategy, the County Development Plan should integrate clear references to the strategy and provide a supportive framework for its implementation. The absence of such a reference in the current draft Plan is identified as a missed opportunity, and it is recommended that the next iteration of the MCDP address this gap.

National Waste Management Plan for a Circular Economy 2024-2030

- The National Waste Management Plan for a Circular Economy seeks to influence sustainable consumption and prevent waste generation, improve material capture to optimise circularity and enable compliance with policy and legislation.
- Core Policy CP12 identifies the need to support and protect existing and future 'nationally' and 'regionally' important waste infrastructure and move towards self-sufficiency. For plants incorporating anaerobic digestion, the thresholds are 50,000 tonnes per annum to meet regional significance and 90,000 tonnes per annum to be considered national significance.
- The submission recommends that the MCDP should clearly define the targets and thresholds for bioenergy plants to qualify as nationally or regionally important waste infrastructure. Regional Importance: Plants with a capacity to process 50,000 tonnes per annum. National Importance: Plants with a capacity to process 90,000 tonnes per annum. In addition, the submission recommends that the Draft Plan includes reference to Core Policy 12 which recognises and supports the need for essential waste infrastructure, including bioenergy plants. This policy should acknowledge the importance of such infrastructure in achieving the county's climate action and waste management goals.

Draft Monaghan County Development Plan

- Submission acknowledges that the draft plan recognises the potential of bioenergy to realise several objectives contained in this draft County Development Plan in the areas of energy supply and energy security, climate change, environmental quality and pollution, economic development, and rural development.
- Anaerobic Digestion plants can service the poultry sector which generates approx. 255,000 tonnes of organic waste according to a report commissioned by Monaghan County Council, *Baseline Study - Poultry Sector in County Monaghan*.
- The Draft Plan confirms the constraints that exist in Co. Monaghan with respect to the management, and specifically the land spreading of organic fertilisers generated from intensive agriculture within the county
- In a study, *Baseline Study Poultry Sector, Co. Monaghan*, commissioned by Monaghan County Council in 2021, the significant quantity of poultry manure being produced within the county and transported for land spreading outside Co. Monaghan is highlighted. A recommendation provided within this study is: *The industry should investigate and develop sustainable outlets for poultry manure to reduce the reliance on land spreading e.g., fuel for alternative and renewable energy production (anaerobic digestion, combined heat and power). This is an opportunity for the sector to seek improvements, improve efficiency, establish best practice and become a leader in sustainable poultry farming. The establishment of alternative outlets for poultry waste e.g., anaerobic digestion would provide benefits in terms of improving the sector's circular economy and provide scope for the sector to avail of Climate Change Action Fund and other possible financial supports that may be available."*
- Further, the Monaghan Local Economic and Community Plan 2023-2029 (LECP), was developed through consultation with a range of different stakeholders which took place from March – June 2023. Climate and the Environment was one of the key themes addressed at the consultation and the following was outlined under this theme within the LECP *Similarly, notwithstanding the good progress made in the agricultural sector to date, it was felt that further collaborative efforts with the farming community were needed to enhance sustainability in the sector. This could include an enhanced provision of grants to assist with developing more energy efficient buildings, specific studies into solutions for ammonia emissions related to poultry farming, the use of more sustainable transport for agriculture and the development of anaerobic digesters.* (Emp added)
- Submission includes a table which contains the development plan policies and objectives which relate to biogas. However, although the submission notes that the Draft Plan provides

substantial support for the biogas sector, which is welcomed, targeted measures could further strengthen these policies and better position the industry for success in County Monaghan.

Renewable Energy & Waste Management

- Submission notes that Chapter 8, Environment, Energy and Climate Change, references biogas/bioenergy whilst Section 8.2.7 deals specifically with bioenergy. Submission states however, that when developing biogas infrastructure, it is crucial that planning policy fully accommodates the diverse range of organic feedstocks available to optimise biogas production. Submission considers that as currently written, the Draft Plan may unintentionally restrict the variety of feedstocks eligible for biogas production, potentially hindering the sector's ability to meet the State's legally binding CAP24 target of 5.7 TWh of biomethane by 2030. This limitation could substantially hinder the successful development of biogas plants needed to meet this target and would run counter to the State's obligations under RED III. Specifically, it would undermine both the renewable energy consumption targets set for 2030 and the requirement for Member States to accelerate and streamline the permitting process for renewable infrastructure.
- Submission states therefore that the policy framework must be designed with flexibility and foresight, ensuring that all sustainable organic feedstocks, such as agricultural residues, food waste, manure, and industrial by-products, are considered viable feedstocks for biogas production. This would help unlock biogas's full potential in terms of renewable energy generation and waste management.
- The submission highlights that feedstock flexibility is crucial for the following reasons:
 - Maximising Renewable Energy Output
 - Waste Reduction
 - Supporting Agricultural and Rural Economies
 - Improving Biogas Plant Viability
 - Local sourcing
- Submission therefore recommends that renewable energy policies must provide for all suitable feedstocks to maximise the County's biogas potential. The submission recommends that a flexible, forward-looking approach to feedstock eligibility will maximise the energy output from biogas production, reduce waste, and significantly benefit the local economy. The submission states that the Plan should encourage innovation and that the Council review and augment the planning framework to ensure that biogas plants can thrive by utilising the full range of organic feedstocks available.

Water Quality

- Submission states that in June 2024, The Environmental Protection Agency (EPA) released its *Water Quality in 2023: An Indicators Report*, which provides an update on the status of Ireland's water bodies based on monitoring data collected throughout 2023. The report highlights that, nutrient levels remain too high in a significant portion of rivers, lakes, estuaries, coastal waters, and groundwater.
- The draft MCDP highlights, among other things, that the intensification of agriculture in recent decades has increased the risk of environmental pollution, particularly affecting natural water systems. It also underscores the importance of safeguarding both the quality and quantity of our water resources to protect public health, support economic development, and ensure ecological sustainability.
- The protection of good and high-status water quality where it exists is a key requirement of the Water Framework Directive (WFD). The draft MCDP sets out that County Monaghan is known for its intensive agricultural activities, particularly its poultry and mushroom industries, which generate large amounts of manure and waste products like broiler litter which are dependent on off-site disposal. This is because grasslands counties, such as Monaghan, have

limited spreading opportunities, and have many sensitive water bodies and substantial areas of wet soils and soils with high runoff risk. In addition, the demand for nitrogen and phosphorus in many grassland farming situations can largely be met by on farm bovine manures.

- The draft MCDP makes clear that the sustainable development of the agri-food sector in Monaghan depends on having quality waste management systems.
- Anaerobic digestion of chicken litter and other farm wastes can help address the water quality issues that exist in Monaghan by providing a more sustainable way to manage these wastes. Anaerobic digestion stabilises the nutrients in wastes, particularly nitrogen and phosphorus, which are typically the main contributors to water pollution. By converting these nutrients into a more stable form, the risk of them leaching into water bodies through runoff is significantly reduced when compared with mineral fertilisers. The digestate produced can be used as an organic fertiliser, which can be applied to land in a controlled manner, reducing the over-application of nutrients that often contributes to water quality problems.
- Submission recommends that the County Development Plan should promote the sustainable management of poultry and other agricultural wastes through anaerobic digestion to reduce nutrient runoff, improve water quality, minimise greenhouse gas emissions, and support renewable energy generation, while ensuring the protection of local and water resources.

Economic Development

- The Monaghan County Council Commissioned *Baseline Study - Poultry Sector in County Monaghan* states, *If the sector is to continue to expand and grow in Co. Monaghan measures will need to be implemented to mitigate the impacts of ammonia and nitrogen emissions and to ensure sustainable management of poultry manure.*
- An IBEC report, *Poultry Sustainability Roadmap Core Priority Areas for the Irish Poultry Industry to 2030*, identifies that the poultry sector (meat and eggs) remains a critical part of the rural economy in many parts of the country, delivering around €700 million in output and supporting over 5,000 jobs. The Border region accounts for around 70% of the flock. The poultry sector is a lynchpin in many local communities in Monaghan regarding its economic contribution to rural economies.
- If poultry manure is not managed sustainably, it can lead to severe environmental and economic risks, ultimately jeopardising the viability of the poultry sector and the rural economy. Unsustainable manure management practices, such as improper disposal, can result in water pollution, greenhouse gas emissions and soil degradation, all of which negatively affect agriculture, biodiversity, and the livelihoods of rural communities.
- There is real potential to turn litter from a product that costs in terms of disposal to a situation where it delivers value by creating a circular economy loop.
- Establishing biogas plants in rural areas can create new employment opportunities, not just in the poultry industry but also in biogas production, operation, and maintenance. These jobs can contribute to local economic development and help stem rural-to-urban migration.
- The construction, operation, and maintenance of biogas plants can stimulate local businesses, including those involved in engineering, agriculture, waste management, and energy supply. This fosters a more resilient local economy and supports regional development.
- Submission recommends that the Plan should explicitly recognise the importance of sustainable manure management in safeguarding the poultry sector and rural economies. The Plan should outline specific actions to facilitate the integration of biogas plants as part of the broader rural economy strategy outlined in Chapter 4.
- In addition, submission recommends that the Plan should acknowledge the multi-tiered employment benefits that Biogas Plants would generate in Monaghan. Unlike other renewable energy technologies, biogas has a unique ability to underpin and strengthen the local rural economy and provide direct employment during construction and operational phases.

Development Management Criteria

- REDIII establishes that renewable energy projects are of overriding public interest, and as such, development management criteria must reflect this priority. The proximity to the grid is a fundamental consideration in the economic viability of biogas projects; the greater the distance from the grid the more economically challenging and less attractive these projects are.
- Typically, beyond 5 km (or perhaps less) direct pipe connection becomes unviable and projects have to opt for virtual pipelines which are much more economically challenging (as indicated in section 2.2.4 only 9% of biomethane plants in Europe are not connected to the grid), However, the gas grid is extremely limited in counties like Monaghan.
- Furthermore, biogas plants are generally large-scale infrastructure comprising a feedstock building, tank farm, and ancillary plant that cannot be easily screened within the landscape, which presents a challenge in terms of visual impacts. As such, the development management criteria need to be balanced to ensure that they are not so restrictive that they undermine the State's ability to meet legally binding renewable energy targets. This approach must allow for the necessary development of biogas infrastructure while also safeguarding the local environment and communities.
- Given the high concentration of poultry installations within County Monaghan, balance is necessary to minimise transport distances and associated emissions and maximise proximity to the main gas network.
- Biogas plants should be facilitated where public roads can serve them with sufficient capacity to absorb increased traffic flows.
- Submission therefore recommends that the criteria set out in Chapter 15 reviewed to ensure that they do not unintendedly prevent the development of a Biogas plant. Regard must be given to the bespoke locational criteria required for this type of renewable energy installation.

Chief Executive Response

The comments put forward by Stream BioEnergy Ireland Limited are noted. The 12 recommendations put forward will be addressed broadly in the order in which they were raised:

The submission requests that the Monaghan County Development Plan recognises renewable energy projects as being of 'overriding public interest'. EECSO 1 which is a Strategic objective, states as follows; To afford a high level of environmental protection in County Monaghan through:

- the provision of quality environmental services which adhere to the precautionary principle,
- the adoption and application of the principles of sustainable development,
- the promotion of reduced energy consumption, energy efficiency and renewable energy to deliver a low carbon future for County Monaghan, and
- the implementation of measures to reduce the human causes of climate change and to consider its effects when formulating Development Plan policies.

It is felt that the strategic objective is sufficient to adequately addresses this recommendation, it places importance on renewable energy and a low carbon future, the test of 'public interest' is dependent on numerous factors and variables, which can only be applied if and when proposals come before the Local Authority.

The submission also requests that the Development Plan facilitates renewable energy production, storage and distribution infrastructure to meet legally binding international renewable energy commitments. It is the responsibility of the government to ensure legally binding international energy commitments are met. As a Local Authority we acknowledge the role it plays working towards those commitments endeavouring to facilitate renewable energy production, storage and distribution infrastructure, in an environmentally sustainable manner in accordance with the parameters set out

in Chapter 15 in conjunction with the targets set Nationally. It is not considered necessary to include recommendation two as Renewable Energy Objective REO 1 and REO 4 adequately addresses this.

The submission states that the Draft Development Plan must align with national and regional planning frameworks, which are guided by national policies and guidelines designed to fulfil the State's binding European obligations. It is accepted that further guidance and policies have been released and should be referenced in the plan, as set out in the chief executive recommendation below.

The submission recommends that a further objective is included in the Draft Plan, the objective put forward will align with the Regional and Spatial Economic Development Strategy RPO 4.28, therefore it is agreed to support this emerging renewable energy however the objective will be amended to correspond with the RSES and will be recommended to be added, as set out below.

The submission proposes that a further policy is included within the draft plan. It states as follows; The Monaghan County Development Plan 2025-2031 promotes the development of biogas plants, to harness organic waste and agricultural residues for renewable energy production. The Council will work with local industry, agricultural stakeholders, and energy providers to ensure that the County's potential for biomethane production is fully utilised. The Council already promotes all aspects renewable energy in objective REO 1 and 4.

The submission recommends that in line with the inclusion of key performance indicators (KPIs) for carbon abatement as set out in Climate Action Plan 2024, it is recommended that the next iteration of the MCDP adopt a similar, structured approach to the agricultural metrics. These metrics should be clearly defined, measurable, and aligned with the national targets, ensuring that agricultural practices in the county contribute effectively to carbon reduction goals and environmental sustainability. It is noted within this document that, *'efforts are in progress to improve the measurability of KPIs, which will help both to better track KPIs and better model their impacts on agricultural emissions'*. Without definitive and measurable KPI's whereby their impacts can be modelled it is unrealistic to seek a Local Authority to include these. The document goes on to state, *'Emissions reduction in the agriculture sector is particularly challenging because it is a biological system; as long as we produce food, fuel or fibre, there will always be residual emissions. In particular, there is a lack of mature technologies to directly mitigate methane emissions from livestock in pasture-based systems'*. Considering the above it is not felt that KPI indicators should be included in respect of agricultural metrics or practices at this time.

Submission recommendation five states that that in light of Monaghan's unique circumstances and the potential for achieving sustainable solutions through the National Biomethane Strategy, the County Development Plan should integrate clear references to the strategy and provide a supportive framework for its implementation. The absence of such a reference in the current draft Plan is noted and it is recommended that the next iteration of the MCDP address this gap. See content of text recommended to be added below.

The submission recommends (No.6) that the MCDP should clearly define the targets and thresholds for bioenergy plants to qualify as nationally or regionally important waste infrastructure. Regional Importance: Plants with a capacity to process 50,000 tonnes per annum. National Importance: Plants with a capacity to process 90,000 tonnes per annum. In addition, the submission recommends that the Draft Plan includes reference to Core Policy 12 which recognises and supports the need for essential waste infrastructure, including bioenergy plants. Stating that this policy should acknowledge the importance of such infrastructure in achieving the county's climate action and waste management goals. In response to this it is recommended that the National Waste Management Plan will be referenced.

Recommendation 7 suggests the incorporation of Core Policy 12 of the National Waste Management Plan into the MCDP which recognises and supports the need for essential waste infrastructure, including bioenergy plants. Reference to the National Waste Management Plan is included in Chapter 8 Section, 8.3 Waste Management and the Circular Economy and is sufficient to address this recommendation.

The submission recommendation 9 suggests that the County Development Plan should promote the sustainable management of poultry and other agricultural wastes through anaerobic digestion to reduce nutrient runoff, improve water quality, minimise greenhouse gas emissions, and support renewable energy generation, while ensuring the protection of local and water resources. This recommendation is covered by REO 4 within the draft CDP. However, a further objective will be added to the Waste Management Objectives.

The submission recommendation (10) suggests that Renewable Energy policies are included as part of the broader rural economy strategy. Stating that the MCDP should explicitly recognise the importance of sustainable manure management in safeguarding the poultry sector and rural economies. The Plan should outline specific actions to facilitate the integration of biogas plants as part of the broader rural economy strategy outlined in Chapter 4. In response to this Waste Management Objective WMO 5 states, 'to support the circular and bioeconomy through the efficient use of resources and to support any development proposals which contribute to this concept. WMO 5 places emphasis on the bio economy and is sufficient to recognise its importance to rural economies. As such recommendation 10 has not been included in the MCDP as it has already been addressed.

Recommendation 11 of the submission places emphasis on the employment benefits of these types of renewable energy. It is accepted that there is a multi-tiered employment benefits arising out of all types of renewable energy infrastructure and facilities. It is recommended to add further text to reflect this in chapter 8.

Recommendation 12 within the submission suggests that the criteria set out in Chapter 15 is reviewed to ensure that they do not unintentionally prevent the development of a Biogas plant. Regard must be given to the bespoke locational criteria required for this type of renewable energy installation. All proposal for renewable energy should consider the location of the area and the surrounding landscape. A proposal for biomethane energy development would not be an exception and should still be in keeping with the policy requirement set out in Chapter 15, Section 15.17 Renewable Energy Development. This is not a recommendation to be included.

It is acknowledged that MCC does not currently have a Renewable Energy Strategy, and an objective in the Draft Plan at REO 2 is to undertake this during the lifetime of the plan. However, to provide greater certainty going forward it is agreed that this should be within a specific timeframe. The importance of renewable energy going forward is recognised by MCC. Any Strategy prepared by the Council will be mindful of EU and national renewable energy policies and targets. Ensuring that all projects demonstrate they are suitable and appropriate in terms of environmental sensitivities through the EIA and AA process and in accordance with Chapter 15 of the CDP.

Chief Executive Recommendations

The following changes are recommended along with those listed in red text below.

1. At Chapter 8 Environment, Energy and Climate Change, Section 8.2.2 EU Legislation add in the following text in red:
Energy efficiency helps to reduce overall energy consumption and is therefore central to achieving the EU's climate ambition, while enhancing present and future energy security and

affordability. The ‘Energy Efficiency Directive’ (EED) (EU/2023/1791) and the guidance issued to Member States which pertains to the revised Renewable Energy Directive (2023/2413/EU), commonly known as RED III, significantly raises the EU’s ambition on energy efficiency, and it also sets out the exemplary role that the public sector has in contributing to this EU target.

2. The following objective added at Chapter 8.

Renewable Energy Objectives	
REO 11	Support and facilitate proposals for secure, appropriately scaled energy storage systems and infrastructure, including green hydrogen gas storage which support energy efficiency and reusable energy systems, provided such proposals have regard for health and safety and accord with the principles of proper planning and sustainable development of the area.

3. At Section 8.2.7 Bio energy in the draft CDP, it specifically states that, ‘these fuels can be produced from purpose grown energy crops, forestry deposits and agricultural wastes’, this sentence will be amended to read as follows, ‘these fuels can be produced from purpose grown energy crops, forestry deposits, ~~and agricultural wastes~~ all sustainable organic/suitable feedstocks, such as agricultural residues, food waste, manure, and industrial by-products’.
4. The National Biomethane Strategy was produced in May 2024 after the draft plan went to public consultation, due to its importance in this sector of renewal energy it is important to refer to it within the CDP, as such as Section 8.2.7 the following paragraphs will be added: ‘The Government is committed to supporting delivery of up to 5.7TWh of indigenously produced biomethane by 2030. A first key step to delivering on this ambitious target is the publication of the National Biomethane Strategy.

The National Biomethane Strategy (May 2024) sets out the necessary policy and regulatory measures, and provides a roadmap, to developing a biomethane industry of scale in Ireland. The development of the Strategy focused on a framework of five interlinking pillars seen as critical to target delivery:

- sustainability;
- demand for biomethane;
- bioeconomy and the circular economy;
- economics of biomethane; and
- enabling policy requirements’.

In July 2022, DECC published a target of up to 5.7 TWh, 10% of national gas demand, to come from biomethane by 2030 as part of the Sectoral Emissions Ceilings. The Environmental Protection Agency (EPA) (EPA – Ireland’s Provisional Greenhouse Gas Emissions report) released in July 2023 on Ireland’s provisional 2022 emissions, highlights the urgency to deliver decarbonisation options for Ireland to meet its 2030 targets. Monaghan Council will give due regard to the National Biomethane Strategy in conjunction with any land use planning requests for biomethane facilities.

5. At Section 8.3 Waste Management and the Circular Economy the inclusion of the following sentence will read as follows:
The National Waste Management Plan sets the thresholds for ‘nationally’ and ‘regionally’ important waste infrastructure.

6. A further objective will be added to the Waste Management Objectives as follows:

Waste Management Objectives	
WMO 12	To promote the sustainable management of poultry and other agricultural wastes through renewable energy facilities to reduce nutrient runoff, improve water quality, minimise greenhouse gas emissions, and support energy generation, while ensuring the protection of local and water resources.

7. Add to Chapter 8 Environment, Energy and Climate Change, Section 8.1 add in the following text in red, re economy and employment benefits:

It is recognised that renewable energy infrastructure can have multi-tiered employment benefit which have a unique ability to underpin and strengthen the local rural economy and provide direct employment during construction and operational phases.

8. At Chapter 8 Environment Energy and Climate Change, Section 8.2.11 titled Passive Housing, within this section at objective REO 2 add the red text as follows with the deletions in black with a strike through.

Renewable Energy Objective	
REO 2	<i>To prepare a Renewable Energy Strategy for the County over the lifetime of this plan and subject to the availability of resources within one year of the publication and adoption of the publication of the Methodology for Local Authority Renewable Energy Strategies or the Regional Renewable Electricity Capacity Allocations for the Northern and Western Region, whichever is sooner. Such a Strategy shall be shaped and informed by environmental considerations, constraints and sensitivities relevant to the Plan Area-including biodiversity, European sites, and landscape and visual amenity related designations.</i>

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-129</u>	Glaslough Village Green Management Company Limited By Guarantee	Glaslough Village, Co. Monaghan.	N/A

Summary of Submission & Issues Raised

This submission relates to landscape preservation and protection in Glaslough Village and its surrounds.

The community of Glaslough envisions a future that honours and protects its scenic landscape, unique heritage, and natural beauty. This plan aims to preserve the village’s character and environment for future generations, ensuring sustainable development that complements the local landscape:

Landscape Conservation Zones

Designate specific areas within and around Glaslough as Landscape Conservation Zones where significant natural or scenic value is identified. These zones will restrict developments and guide permissible activities to those that align with landscape preservation.

Tree and Vegetation Protection

Implement policies for tree and vegetation protection to maintain the ecological health and aesthetic quality of the village. Any development proposals must include plans to preserve existing mature trees, hedgerows, and other natural features that define Glaslough’s rural landscape.

Sustainable Development Standards

Require that all new developments meet sustainable and low-impact design standards. These include limits on building height and massing, appropriate material use that harmonizes with the natural setting, and landscaping practices that support native flora and fauna.

Preservation of Historical Landmarks and Views

Identify and protect historical landmarks, heritage buildings, and important viewpoints. Development proposals should respect these elements by maintaining sightlines, visual integrity, and appropriate buffers around Glaslough’s historical assets.

Community Involvement in Landscape Planning

Foster community involvement in landscape planning decisions to ensure that future changes align with local values. This will include public consultation sessions, a feedback process, and the creation of a community-led landscape advisory committee.

Environmental Impact Assessment for Development

Require comprehensive environmental impact assessments for any proposed developments that may alter Glaslough’s natural environment. These assessments will evaluate potential impacts on biodiversity, water quality, and landscape views, and outline mitigation strategies where necessary.

- The submission notes that by prioritizing the preservation of Glaslough’s natural and historic landscape, Monaghan County Council commits to protecting the village’s character while allowing for sustainable, mindful development. The council will work closely with residents,

developers, and other stakeholders to uphold these values and ensure Glaslough remains a place of beauty, heritage, and ecological richness.

Chief Executive Response

The draft Development Plan designates Glaslough as a Tier 4 Village. In recognition of the importance of Tier 4 villages in sustaining the vitality of rural communities, it is an objective of the Development Plan to prepare Tier 4 Village Plans during the lifetime of the Development Plan. It is envisaged that these plans will be delivered on a strategically phased basis following agreement with the Elected Members of Monaghan County Council. In response to the OPR submission, MN-C22-MCDP-126, regarding the timeframes and focus of the village plans, it is recommended that Objective SHO 5 in Chapter 2 and VIO 4 in Chapter 9 are amended along with the inclusion of additional explanatory text in Section 9.15 as set out below.

The Tier 4 Village Plans will provide an overarching strategic framework for each of the villages and will focus on topics including housing, amenity, infrastructure, parking provision as well as sustainable reuse and regeneration. A level of community engagement will be afforded to enable interested parties to become involved in shaping the future of these villages and influence how their communities grow and develop.

The comments in relation to tree and vegetation protection are noted. The County Development Plan acknowledges the contribution of tree, hedgerows and woodlands as reflected in Policies TWP 1 and TWP 2.

The comments made in relation to sustainable development standards are also noted. Proposals within Architectural Conservation Areas (ACAs) shall comply with the Architectural Conservation Areas Objectives & Policies as set out within Chapter 6 of the development plan, in addition to relevant policies and objective set out in Chapter 15 Development Management Standards.

Glaslough Village is designated as an Architectural Conservation Area (ACA) and submission requests an extension of the ACA boundary. It is an objective of the development plan (ACO 1) is “to carry out a comprehensive review of the Architectural Conservation Areas within the County during the lifetime of this Plan”. This objective has been amended as per response O9(ii) of the response to the OPR Submission, MN-C22-MCDP-126. The review of Glaslough ACA affords the opportunity to identify and protect further historical landmarks and heritage buildings within Glaslough. Furthermore, the objectives and policies contained within the draft Development Plan are considered to afford sufficient protection of the historic landmarks and buildings.

The suggestion of a community-led landscape advisory committee is outside of the remit of the County Development Plan. Whether a development requires an Environmental Impact Assessment to be conducted is determined by legislative requirements as set out in EIA Directive.

Chief Executive Recommendation

It is recommended that Objective SHO5 in Chapter 2 and Section 9.15 and Objective VI4 in Chapter 9 are amended as follows:

Villages Objective	
SHO 5	To prepare Tier 4 village plans during the lifetime of this plan, with a focus on housing, amenity, infrastructure, and parking provision transport and the sustainable reuse and regeneration of existing derelict, vacant, or underutilised

	sites. At least one village plan will be prepared for a village in each of the three Municipal Districts per annum.
--	---

It is also recommended that Objective VIO 4 within Section 9.15 in Chapter 9 – Strategic Objectives for Settlements is amended as indicated below:

9.15 Tier 4 Village Plans

In recognition of the importance of Tier 4 villages in sustaining the vitality of rural communities, it is an objective of the Development Plan to prepare Tier 4 Village Plans during the lifetime of the Development Plan. It is envisaged that these plans will be delivered on a strategically phased basis following agreement with the Elected Members of Monaghan County Council. Community engagement will be a key element to enable interested parties to become involved in shaping the future of these villages and influence how their communities grow and develop.

Tier 4 Villages Objectives	
VIO 4	To prepare plans for the Tier 4 villages plans during the lifetime of this plan, which with a focus on housing, amenity, infrastructure, parking provision and traffic calming transport during the lifetime of this plan, subject to available resources. and the sustainable reuse and regeneration of existing derelict, vacant, or underutilised sites. At least one village plan will be prepared for a village in each of the three Municipal Districts per annum.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-138</u>	Eugene Wacks and Rose Deery Wacks	N/A	N/A

Summary of Submission & Issues Raised

- Wishes to make a submission in relation to the Draft Plan, specifically in relation to noise and noise impacts.

Introduction

- The very first sentence of the WHO’s Environmental Noise Guidelines for the European Region 2018 says that: *“Noise is one of the most important environmental risks to health and continues to be a growing concern among policy- makers and the public alike.”*
- Sadly, despite the resoundingly strong comments and findings of the WHO in the aforesaid publication, and many indeed with similar comments made by other eminent bodies and persons regarding the seriousness of noise pollution and its impacts, the Draft Plan in its current form disappointingly contains rather terse and limited references to noise and noise impacts which is very problematic.

The following are the Noise Objectives in the Draft Plan (with items emphasised in **bold** below):

*NO 1 To **promote** the implementation of the Noise Directive 2002/49/EC and associated Environmental Noise Regulations 2006.*

Comment: The language “promote” simply lacks significance. Why, for instance, is not more binding language used here, for example “to ensure compliance with....” as opposed to simply promote?

*NO 2 To ensure development design **considers** noise alleviation measures, were appropriate, to reduce noise and vibration impacts on surrounding amenities, particularly residential amenity and other noise sensitive locations (e.g., places of worship, healthcare facilities).*

Comment: While mitigation measures are generally welcomed once they are proven to be effective, the obligation here is simply that such measures are considered and nothing more. With this proposed objective, a mitigation measure may well be considered by the planning authority, but that doesn’t necessarily mean that it will be imposed by way of planning condition.

Again, the language used in relation to residential amenity is non-binding:

*All developments must **have regard** to their potential impact upon the residential amenity of existing and permitted residential land uses in the vicinity of the development.*

Comment: This means that a development could in theory have regard to the impact it has on residential amenity but impact it very negatively and still receive the benefit of planning permission. This is simply problematic.

This shows that there are significant shortcomings with the Draft Plan provisions on noise and noise emissions.

Comparative Examples

- Submission states that other current County Development Plan contain much more robust provisions around noise and noise emissions. Some extracts include:

- Wicklow Development Plan:
- NPO 65 Promote the pro-active management of noise where it is likely to have significant adverse impacts on health and quality of life and support the aims of the Environmental Noise Regulations through national planning guidance and Noise Action Plans.
- CPO 15.14 To regulate and control activities likely to give rise to excessive noise (other than those activities which are regulated by the EPA).
- CPO 15.15 To require proposals for new developments with the potential to create excessive noise to prepare a construction and/ or operation management plans to control such emissions.
- CPO 15.16 To require activities likely to give rise to excessive noise to install noise mitigation measures to undertake noise monitoring etc.

Galway County Council Development Plan:

- NP 4 Noise Pollution and Regulation: Restrict development proposals causing noise pollution in excess of best practice standards and regulate and control activities likely to give rise to excessive noise, other than those activities which are regulated by the EPA.
- NP 5 Noise Mitigation Measures: Require activities likely to give rise to excessive noise to install noise mitigation measures and monitors. The provision of a noise audit may be required where appropriate.

Wexford County Council Development Plan:

- Objective N05: To regulate and control activities likely to give rise to excessive noise, other than those activities which are regulated by the Environmental Protection Agency.
- Objective N06: To ensure new development does not cause an unacceptable increase in noise levels affecting noise sensitive properties. Proposals for new development with the potential to create excessive noise will be required to be accompanied by a construction and/ or operation management plan to control such emissions.

Conclusion

In the Supreme Court in *AG (McGarry) v Sligo County Council* [1991] 1 IR 99, Walsh J described a development plan in the following terms:

“The plan is a statement of objective; it informs the community, in its draft form, of the intended objectives and affords the community the opportunity of inspection, criticism and if thought proper, objection. When adopted it forms an environmental contract between the planning authority, the Council and the community, embodying a promise by the Council that it will regulate private development in a manner consistent with the objectives stated in the plan.”

Submitters reside circa 140 metres from a clay pigeon shooting grounds, we are subjected to listening to highly tonal and impulsive noise which has a terrible impact on residential amenity. We understand very well the plight that neighbours to noise emitting developments must endure and it is imperative that the Draft Plan recognises and responds to noise and noise impacts in an objectively meaningful and effective way.

Submission states Draft Plan has serious shortcomings in relation to safeguarding residents and communities from noise emissions. When objectively viewed in comparison to other County Development Plans in the context of noise and noise emissions, such as those examples cited above, the Draft Plan can only be described critically.

We trust that our concerns are noted and sincerely hope that the Draft Plan will be amended to include robust, meaningful and enforceable objectives in relation to noise and noise pollution given the profound impacts of noise polluting developments on families and communities.

Chief Executive Response

The submission correctly identifies that the Draft Development Plan contains Noise Objective NO 1 & NO 2, at Section 8.11. The comments made within the submission raise particular concern with the inclusion of the term “*promote*” within NO 1, and “*considers*” in NO 2.

- NO 1: To promote the implementation of the Noise Directive 2002/49/EC and associated Environmental Noise Regulations 2006.
- NO 2: To ensure development design considers noise alleviation measures, where appropriate, to reduce noise and vibration impacts on surrounding amenities, particularly residential amenity and other noise sensitive locations (e.g., places of worship, healthcare facilities).

The comments made in relation to Section 15.22.2, Residential Amenity’ are noted. However, as 15.22.2 states, “development which has the potential to detrimentally impact on the residential amenity of properties in the vicinity of the development, by reason of overshadowing, overbearing, overlooking, dominance, emissions (e.g. noise, smell, pollution) or general disturbance, shall be resisted. It is considered that this is clear and unambiguous and as such no further amendment to this wording is considered necessary.

It should also be noted, that the above mentioned objectives are not the only reference to noise within the Draft Development Plan. The importance of protecting the residential amenity enjoyed is considered at sections 15.12.1 (Industrial and Commercial Developments within Tier 1-4 Settlements), 15.12.2 (Industrial and Commercial Developments Outside Settlements), 15.13.1 (General Requirements for Agricultural Development), 15.17 (Renewable Energy Development), 15.30 (Construction Wastes and Construction and Environmental Management Plans) and 15.33 (Protection of Public Assets and Infrastructure)

The examples of other Local Authority Development Plans provided within the submission are noted. In summary, it is considered that the draft Development Plan 2025-2031, when read in the round, is considered to provide satisfactory protection for residential amenity, specific to the comments raised in this submission, by ensuring that development which would detrimentally impact upon residential amenity by way of noise emission, shall be resisted.

Chief Executive Recommendation

No amendment required.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-140</u>	Monaghan Irish Farmers Association (IFA)	N/A	N/A

Summary of Submission & Issues Raised

- Submission notes that Monaghan IFA is committed to ensuring a sustainable high-quality environment for food production and to ensuring their members and their families are respected in their freedom to farm and to live and be enabled to develop an economically viable future for themselves and future generations.

Planning and Sightlines

- Monaghan IFA strongly oppose the requirement from Monaghan County Council to request applicants seeking planning permission to submit the form referred to in '*Appendix 13 Form of Agreement–Visibility Splays and Forward/Rear Visibility*' in its current legal format. Having a legally binding burden placed on a landowner's deeds can potentially be devastating to relationships in rural communities, pitting land owners against each other.
- Monaghan IFA proposes that an alternative legal form signed by both parties, be presented as part or attached to a bundle of deeds as opposed to being placed directly as a burden on the deeds themselves.
- Submission includes a revised agreement to replace the legal agreement contained within Appendix 13 of the Draft Development Plan.
- The author states that in the event that the revised agreement wording is not to the satisfaction of the Council, the farmer consenting to the sight distances should sign an affidavit authorising consent as maybe required.
- Submission notes that the issue is hindering rural housing developments as well as causing problems regarding the day to day running of farms, where farmers have not been able to secure permission to live on their farm.

Intensive Agriculture, Poultry and Pig Installations

- Submission quotes Section 15.3.2 of Chapter 15 of the Draft Plan which states "Intensive agricultural installations such as poultry units are of important economic benefit to the County. However, due to their nature, intensive agricultural developments must be regulated to ensure there are no adverse environmental impacts arising from them. In this regard, any development which will result in an increase in ammonia and/or nitrogen emissions within 10km of a European Site (Natura 2000 site) shall not be permitted". Submission notes that this restriction will halt economic development in the County.
- The submission queries whether this restriction is specially related to poultry and questions the ammonia figures on which the restriction is based.
- Monaghan IFA requests that Monaghan County Council make a freedom of information request, for the EPA Ammonia figures that the restriction was based upon and review these figures on annual basis.
- Monaghan IFA is aware of a taskforce which was set up regarding the issues of ammonia/nitrogen and the effects on Natura 2000 sites and which included Council representatives, industry representatives, processors etc but no farming representatives. Monaghan IFA recommend that farmer input is vital and request at least 1 representative be included on this taskforce, at a minimum.

Planning Permission along National Routes

- Submission raises concerns regarding the restriction of new or the intensification of existing accesses onto National Routes and notes that the restriction results in farmers being unable to build housing, it devalues farmland assets and prevents farmers from developing their businesses.

- The requirement to grant planning permission along national routes is a necessity for many planning applications, as in many instances the only available land for development is along a national route and is a requirement for the continued existence of family farms.

Critical Sustainable Infrastructure

- Monaghan IFA requests that rural road networks are maintained to an acceptable standard equivalent to road standards in urban areas and that if a complaint is made to a Councillor/County Council Official in relation to road quality; a process to investigate the complaint should be put in place.
- Monaghan IFA acknowledge the level at which Monaghan County Council engages with IFA representatives on major infrastructure projects i.e. N2 Border to Clontibret & N2 Clontibret to Ardee projects and we hope to build upon this level of engagement going forward into the future.

Septic Tanks

- Monaghan IFA is aware from local media that issues surrounding older septic tanks in the county are causing problems to groundwater. Monaghan IFA requests that Monaghan County Council extend the eligibility criteria for the upgrading Septic tanks to anyone who is interested in participating in the scheme.

Hedge Cutting

- Monaghan IFA request that in the interest of the safety of road users and silage contractors/farmers, a minimum level of maintenance hedge cutting at junctions and pinch points is required, especially during the summer “Silage Season” to enhance visibility and help prevent vehicle collision with injury and possible loss of life. Consultation with local residents and representatives would quickly identify such areas.

Roadside Trees and Roadside Ash Dieback Removal Scheme

- Submission states that Monaghan IFA is seeking the introduction of a financial support package for farmers and landowners, who would be responsible for coordinating the safe removal of the trees by providing grants to support farmers and landowners to hire relevant professionals to safely fell these trees. The scheme would be administered by Monaghan County Council who would also be responsible for coordinating the safe removal of the trees by providing support to farmers and landowners. Submission asks that Monaghan IFA be consulted with on the production of this scheme.

Chief Executive Response

The Draft Development Plan acknowledges the importance of agriculture in contributing to the economic development of the County and as a source of employment in rural areas

Planning and Sightlines

This matter was comprehensively considered during the preparation of previous County Development Plans and the use of legal/forms of agreement is considered to be best practice to ensure that adequate road safety is maintained/provided and to prevent issues in the event of a re-sale. Agreements are utilised in situations where the requisite sight splays can only be achieved via third party lands.

The Development Plan notes that a well-designed access is important for the safety and convenience of all road users, those proceeding on the public road, as well as those using the access. In accordance with Section 15.23.2 of the Development Plan, development proposals involving new accesses or the intensification of an existing access onto non-urban roads are required to comply with the minimum visibility standards as detailed within Table 15.5 of the Development Plan. It is however proposed that Table 15.5 of the Plan is amended to reflect the Design Speed (km/hr) in each road category and that visibility splays are adjusted accordingly in line with Transport Infrastructure Ireland (TII) standards.

Additionally, it is noted that Section 15.23.2 of the Plan affords for a reduction in the standards set out in Table 15.5 where it has been satisfactorily demonstrated by way of a site-specific survey and accompanying report completed by a suitably qualified, competent technical professional, that a reduced standard would be appropriate and safe.

Intensive Agriculture, Poultry and Pig Installations

Monaghan County Council and the EPA are the relevant regulatory authorities for poultry development in the County and are responsible for implementing relevant Environmental legislation and the provisions of the Habitats Directive.

Due to the cumulative impacts of ammonia on European Sites, the EPA issued new guidelines in 2021 which stated that they would no longer grant Licences for Poultry Developments within 10km of European Designated sites. In addition, existing farms would need to invest in technologies to control or reduce ammonia levels before any expansion applications would be considered. Monaghan County Council has a responsibility to protect European Sites (Special Protection Areas and Special Areas of Conservation), and as a consequence is required to align with EPA Guidance. As a result, Section 15.13.2 of the Draft Plan restricts any development which would result in an increase in ammonia and/or nitrogen emissions within 10km of a European Site (Natura 2000 site).

Planning Permission along National Routes

The national road network provides County Monaghan with strategic links to the surrounding region and nationally, connecting the County to major urban areas, ports and airports. The protection of the capacity and safety of the national roads network is therefore of significant importance for the Council. The Development Plan includes a number of objectives and policies that seek to maintain the strategic function, capacity, and safety of the national roads network including a policy which seeks to avoid the creation of any additional access point from new development, or the generation of increased traffic from existing access to national roads to which speed limits greater than 60kmph apply, in accordance with the requirements of the Section 28 Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities'.

Critical Sustainable Infrastructure

The issues raised in the submission relating to critical infrastructure, specifically relating to complaint procedures relating to road quality fall outside the remit of the development plan.

It remains a policy of the Development Plan to progress the N2 Clontibret to Border and the N2 Ardee to Castleblaney Road Schemes.

Septic Tanks

The issue raised within the submission relating to the eligibility criteria for upgrading septic tanks falls outside the remit of the development plan. The development plan does however include objectives and policies which seek to protect groundwater.

Hedge Cutting

The issue raised in the submission relating to critical infrastructure, specifically relating to maintenance and hedge cutting at junctions, fall outside the remit of the Development Plan.

Roadside Trees and Roadside Ash Dieback Removal Scheme

The issue raised in the submission relating to the introduction of a financial support package for farmers and landowners, regarding the safe removal of trees falls outside the remit of the development plan. However, as proposals for afforestation constitute development, it is considered reasonable that

additional wording is included within Section 15.15 Forestry of Chapter 15 to ensure that proposed for forestry development do not adversely impact upon overhead electricity and telecommunication lines.

Chief Executive Recommendation

It is recommended that Section 15.15 and Table 15.5 in Chapter 15, are amended as follows:

15.15 Forestry

The Planning Authority will facilitate afforestation in appropriate locations in accordance with the principles of sustainable forest management and code of best practice.

Proposals for forestry, including harvesting will only be considered acceptable where it does not adversely impact upon the following:

- a) The visual amenity of the rural environment
- b) The integrity of habitats, biodiversity and designated sites (for example Natura 2000 sites, NHAs, pNHAs)
- c) Public rights of way
- d) Public road network
- e) Water quality
- f) Residential amenity
- g) Archaeology
- h) **Overhead Electricity and Telecommunication Lines**

Table 15.5 Minimum Visibility Standards

Road Category	Design Speed (Km/hr)	Y distance (m)	X Setback distance (m)	Eye Height/Object height (m)
National (upgraded)*	100	215	3.0	1.05 – 2.0m
National (not upgraded)	85	160	3.0	1.05 – 2.0m
Regional (upgraded)*	85	160	3.0	1.05 – 2.0m
Regional (not upgraded)	70 85	120	2.4	1.05 – 2.0m
Local Primary (80km/hr)	60 85	90	2.4	1.05 – 2.0m
Local Primary (60km/hr)	60 70	90 70	2.4	1.05 – 2.0m
Local Secondary	50 70	70	2.4	1.05 – 2.0m
Local Tertiary	42 60	50	2.4	1.05 – 2.0m
Cul-de-sac	42	35	2.4	1.05 – 2.0m

*Upgraded to TII standards

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-141</u>	Noel McGuigan c/o CS Pringle	N/A	N/A

Summary of Submission & Issues Raised

Proliferation of unused derelict dwellings and Vernacular Rural Buildings

- Submission notes there is a proliferation of unused old houses and old farm buildings throughout County Monaghan, with many becoming visually unsightly in the landscape over time and therefore a positive approach is required in the development plan to promote and engage with the owners of such structures to help encourage them to rejuvenate these old buildings.
- Submission refers to the definition of a dwelling house as defined within The Affordable Housing Act 2021.
- Submission notes that The Vacancy, Dereliction and Regeneration Bill 2022 was a welcome document but mainly deals with town centre first properties and not rural dereliction.
- Section 4 of the Vacancy, Dereliction and Regeneration Bill 2022 refers to the fact that one needs planning permission to change the use of a Dwelling House to any other use. The author asks whether structures used for the temporary storing of animals should therefore be ignored by planners when for example they are asked to pass an old dwelling for an extension under Exempted Development Application.
- Submission references Section 5 of the Vacancy, Dereliction and Regeneration Bill 2022 that the Housing Authority may require a house to be made fit for human habitation.
- Submission notes that the local authority has powers under the Dereliction Act 1990 & 2000 to give notice to persons who allow a dwelling house to deteriorate to such a degree as to leave it uninhabitable. The author queries why there are so many derelict dwelling houses throughout the County.
- Submission states that it appears, in cases where dwellings have been used to store animals on a temporary basis without obtaining planning permission to do so, the use of the structure reverts back to residential in line with the provisions of the Vacancy, Dereliction and Regeneration Bill 2022
- Section 15.9.3 of the Draft Development Plan is welcomed by the author but the submission notes that criteria 'e' and 'f' are not helpful and will prevent many renovation projects. Submission requests that criteria 'e' and 'f' are omitted from Section 15.9.3.
- The author acknowledges that the content required to build within 100 metres of an agricultural building is to protect the farmer and their livelihood. However, the submission queries whether a legal document from the applicant proposing to renovate the derelict structure signs a legal document to confirm that the applicant will not object to any exiting or future farming activities would suffice.

Replacement of Vernacular and Non-Vernacular Buildings and Dwellings

- Submission requests that criteria 'e' and 'h' are removed from Section 15.9.4 of the Draft Development Plan.

Local Needs exemption for existing derelict rural dwellings

- The submission requests that the 'local needs' rule is relaxed with respect to derelict dwellings. Submission states that a dwelling remains a dwelling unless permission for a change of use is sought and granted.
- Submission requests that all planning applications for replacement dwellings should not be subject to local needs criteria or to the 100 metre agricultural policy.
- Submission welcomes the amendment to the local needs policy which removes the requirement to prove that a dwelling has not been vacant for a period in excess of 10 years.

Vacant Property Refurbishment Grant

- Submission states that some of the policies proposed in the Draft Plan are at variance with government scheme to promote the renovation and re-habitation of older dwellings.

Conclusion

- Submission requests that the following points are considered in the making of the development plan:
 - That the status of a dwelling house even in derelict form should be still treated as a dwelling house unless a planning application has been made on this building to change its status.
 - That Monaghan County Council should play a more proactive role in promoting the rejuvenation of old buildings in the rural countryside of County Monaghan and that hurdles placed in the Draft Plan be removed with regard to the following:
 - (i) The 100m rule.
 - (ii) That old unused or derelict dwelling houses in Areas Under Strong Urban Influence be exempt from the Local Needs Policies.
 - That sections 15.9.3 and 15.9.4 are amended to remove the reference to the requirement to provide letters of consent if a property is within 100 metres of an agricultural building. Submission states that in the case where people are already living in a property and wish to extend the property, the consent letter should not be required.
 - That the definition of 'Immediate Family' and in particular the reference to 10 years is reduced to 2 years. This is required to allow people who have lived abroad for less than 10 years to be able to return and build on family land.
 - All planning policies should be compatible with the new Vacant House Grants.

Chief Executive's Response

The submission quotes the definition of a dwelling as provided for within The Affordable Housing Act 2021. The Affordable Housing Act seeks to provide for the provision of dwellings for the purpose of sale under affordable dwelling purchase arrangements; to provide for the provision by housing authorities of financial assistance to purchase dwellings under affordable dwelling purchase arrangements; to provide for dwellings to be made available on a cost rental basis; to provide for funding to be made available for the purchase of dwellings in accordance with a scheme of shared equity; to enable housing authorities to notify the public and assess eligibility and priority in relation to dwellings provided by the Agency.

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

'habitable house' means a house which:

- (a) is used as a dwelling,
- (b) is not in use but when last used was used, disregarding any unauthorised use, as a dwelling and is not derelict, or
- (c) was provided for use as a dwelling but has not been occupied;

'house' means a building or part of a building which is being or has been occupied as a dwelling or was provided for use as a dwelling but has not been occupied, and where appropriate, includes a building which was designed for use as 2 or more dwellings or a flat, an apartment or other dwelling within such a building.

Submission also quotes The Vacancy, Dereliction and Regeneration Bill 2022. This Bill lapsed with the dissolution of the Dáil in November 2024 and has not been signed into power by the President. In this

regard, Section 5 Exempted Development Applications shall be determined in accordance with the provisions of the Planning and Development Act 2000 (as amended) and the Planning and Development Regulations 2001 (as amended).

The submission also references the powers the Local Authority has under the Derelict Sites Act 1990 (As Amended) and queries why so many derelict houses are still located within the County. Monaghan County Council continues to be proactive in tackling dereliction throughout the County. In 2024, 117 Derelict Sites Notices were issued with 43 properties being entered under the Derelict Sites Register as a result.

In line with National and Regional policy, and in particular Regional Policy Objective RPO 3.3 which seeks to “deliver at least 20% of all new housing in rural areas on brownfield sites”, the Draft Development Plan recognises opportunities to achieve this target through for example, the encouragement of the renovation of vacant or derelict dwellings, the provision of on-site replacement dwellings, the redevelopment of previously developed residential sites and former homesteads, and the redevelopment of sites containing industrial or agricultural buildings. This is reflected within Objective RSO2 of Chapter 2, Core Strategy. Additionally, Section 15.9.4 of the Draft Development Plan clearly notes that the restoration or adaption of existing vernacular buildings and dwellings over demolition will be encouraged and notes that where a new building is necessary, the original building or dwelling should be retained for ancillary uses.

However, in recognition of the County’s significant agricultural base, it remains important that the current operations of a working farm are protected, and it is considered that where a residential dwelling is located within 100 metres of a third party agricultural structure, the submission of written agreement which has been signed by both parties and witnessed by a Solicitor or Peace Commission is the most appropriate means through which this is undertaken.

The submission requests that criteria ‘f’ (replacement dwellings) of Policy RSP7 ‘Rural Settlement Polices’ is removed. Within the current Monaghan County Development Plan 2019-2025, Policy RSP 7 reads ‘The dwelling is to replace an existing dwelling, where the dwelling to be replaced; was in use or last used as a dwelling; has not been changed to a dwelling from another use without planning permission; has not been vacant for a period in excess of 10 years prior to the date of submission of a planning application; exhibits all the essential characteristics of a habitable dwelling house and is reasonably intact’. Within the Draft Development Plan, the wording of Policy RSP 7 has been amended to read ‘The dwelling is to replace an existing dwelling, where the dwelling to be replaced; was in use or last used as a dwelling; has not been changed to a dwelling from another use without planning permission; exhibits all the essential characteristics of a dwelling house and is reasonably intact’. By removing the criteria to prove that the dwelling has not been vacant for a period in excess of 10 years, the policy is now less restrictive and facilitates the reuse of brownfield sites.

In line with the requirements of The Sustainable Rural Housing Guidelines (2005), the Draft Plan has identified categories of rural areas to ensure the protection of those rural areas on the edge of the urban centres, whilst encouraging new development needed to sustain and renew the established rural community in the wider rural area. Therefore, within the Draft Plan, the areas around Monaghan, Carrickmacross, Castleblayney and Clones towns have been designated as Rural Areas Urban Strong Urban Influence, to support the sustainable growth of the urban areas, to provide for the immediate local rural community who have a genuine housing requirement, and to direct urban generated housing into the designated settlements. It is considered that in these areas of the County which have been identified as being under urban influence, the policy requirements should be specific to ensure that a clear distinction between the built-up areas of settlements and the surrounding countryside is preserved. It is therefore recommended that criteria ‘f’ remains.

Sections 15.9.3 and 15.9.4 of the Draft Plan relate to the restoration of vernacular buildings and dwellings and the replacement of vernacular and non-vernacular buildings and dwellings respectively. In these cases, if the proposal involves restoration works, or involves the replacement of a dwelling or the change of use from a non-residential structure to a residential structure and such proposals are located within 100 metres of an agricultural structure, written consent is required from the owner of the agricultural structure. Where written consent has been provided, a condition restricting the first occupancy of the dwelling to the applicant or members of their immediate family or heirs shall be included in any grant of permission. As previously stated, in recognition of the County's significant agricultural base, it remains important that the current operations of a working farm are protected and therefore no amendments to these Sections of the Draft Plan are recommended.

The submission requests that the definition of 'immediate family' is amended and that the reference to 10 years is reduced to 2 years. The submission notes that if a son/daughter of a landowner moved abroad for less than 10 years and wished to come home and build within a Rural Area Under Strong Urban Influence, they would not be able to because they would have had to have lived away for a period of 10 years. The definition of 'immediate family' as provided within the Draft Plan is 'a sibling, son or daughter, or adopted child of the landowner. Where the landowner's child(ren) have resided outside the state or Northern Ireland for a minimum continuous period of ten years or where the landowner has no children, a niece/nephew maybe considered a landowner's family member'. If a son/daughter of a landowner lived away for a period less than 10 years, they would still be considered an immediate family member in accordance with the first line of the definition. This is considered reasonable and as such no amendment is recommended.

Chief Executive Recommendation

No amendment recommended.

Submission Reference	Name/Organisation	Location of Subject Lands	Map Booklet Page No.
<u>MN-C22-MCDP-150</u>	David O'Rourke	N/A	N/A

Summary of Submission & Issues Raised

Wish to draw particular focus to proposing Local Government under the General Authority preserved, to the greatest extent, adopting Smart Planning Provisions in the forthcoming densification of Small Cell Deployment in Public Rights of Ways within the Municipality.

To condense to bullet points, the relevant issues and foreseeable challenges of unmanaged small cell deployment on street furniture in public rights of way is a formidable and challenging ask.

There is a vast resource of new scientific, Medical, Technical, Legal evidence invalidating health assumptions and environmental assumptions underlying ICNIRP and current government policy to exposure limit determinations for radio frequency: implications for 5g small cell rollout.

The entire subject is complex and complicated.

Many Local Councillors have first-hand knowledge and experience of representation with the community to the bureaucratic process, hurdles arguments and challenges to object to inappropriate siting of telecommunication infrastructure.

Propose an appropriate small cell policy deployment committee be appointed to investigate, understand, deliberate technical, economic, environmental, biological and legal and liability issues, aspects and exposures to the council and community for due diligence, management controls, oversight, risk assessment and mitigation to placements densification and operation of this technology in the public rights of way in the municipality of Monaghan County.

The current EU wide recognition of electro sensitivity as a Disability causing neurological symptoms has implications under disability recognition, obligations and accommodation's affecting many aspects within the European community and its member states.

Electro sensitivity Disability and causation may have implications to due diligence, considerations for risk assessment, risk mitigation and required accommodations within Local Authority in its services, facilities and access provided in the future e.g

- Due Diligence and Risk Assessments, Mitigation measures
- Councils Occupier' s Liability for stakeholders and tenants,
- White ways/ low Rf- Emf zones and routes through rights of ways
- S. 1. 337 of 2016
- Sensitive areas and Sensitive Receptor Exposure Mitigation

Much can be learned and perhaps adopted here with in our planning policy from successful implemented Small Cell policy in other Jurisdictions. Consider it wise "Local Small cell deployment Policy" should at least be referenced in the current development plan, which can have weight of material consideration to address inappropriate siting and issues in the future.

The submission was accompanied with 18 supporting documents. For the purpose of providing an overview of the submission and issues raised, they have not been included within submission summary.

Chief Executive Response

This submission refers to small cell deployment. The EU Gigabit Infrastructure Act (GIA) will come into law by November 2025 and will bring new stipulations regarding small cell deployment.

It is noted that the submission suggests that a ‘small cell deployment committee be appointed’, however, it is noted that there is currently a GIA steering group featuring members of DECC and CCMA which examine all requirements under the GIA. Any further changes in relation to the deployment of infrastructure and the telecommunication policy for local authorities are likely to emerge through this steering group. Submission refers to International Commission on Non-Ionizing Radiation Protection (ICNIRP). Considered that such national/international bodies are better equipped to make informed decisions than a local small cell deployment committee.

It is likely that there will be ongoing demand for 5G, 6G and 7G in the foreseeable future and as such, it is important that there are policies and guidelines in place to facilitate these technologies and the location of small cells. Whilst this will follow as a legal requirement under the provisions of the GIA, the County Development Plan shall also be amended to include reference to supporting small cell deployment.

Chief Executive Recommendation.

Include reference to small cell deployment within Section 7.9 of the County Development Plan 2025-2031.

“The existence of high quality and sustainable telecommunications network is vital to the continued growth of the economy and the quality of life in the County. There have been considerable advancements in the provision of telecommunications infrastructure in the last two decades. Broadband is central to the development of a knowledge-based economy and can help to combat social exclusion by providing access to information and services in the areas of education, banking, research and business. **It is also acknowledged that small cell deployment within the County is likely to increase during the lifetime of the development plan, such technologies shall be sensitively located to ensure connectivity whilst protecting community wellbeing”.**

PART 7

SUPPLEMENTARY MAP AMENDMENTS



Supplementary Map Amendments – Explanatory Note

The supplementary amendments are being recommended following internal consultation of the Draft Plan and where notable omissions were identified.

Supplementary Map Amendments		
Chapter	Section	Amendment
Chapter 9	Village Maps (Annayalla)	Amend mapping/zoning error on site at Mullaghduff, Annayalla for the location of the Sewerage Treatment Works – insert map
Chapter 9	Village Maps (Scotshouse)	Amend mapping/zoning error on site at Aghnahola, Scotshouse for the location of the Sewerage Treatment Works and Recreation/Amenity – insert map
Chapter 10	Map MDP 2	Amend mapping/zoning error on lands at Old Cross Square, Monaghan Town from Recreation/Amenity to Town Centre – insert map
Chapter 11	Map CKDP 1	Amend mapping/zoning error on site at Kingscourt Road (Coill an Rí) from Recreation/Amenity to Existing Residential – insert map
Chapter 11	Map CKDP 1	Amend mapping/zoning error on site at Lurgans from Existing Residential to Rural Area – insert map
Chapter 12	Map CYDP 1	Amend mapping/zoning error on site at Drumillard Little from Industry/Enterprise/Employment to Community Services/Facilities – insert map
Chapter 14	Map BBDP 1	Amend mapping/zoning error on site at Corrybrannan from Community Services/Facilities to Landscape Protection/Conservation – insert map