OPR Ref: DP- 016-23



14th November 2024

Monaghan County Council, County Offices, The Glen Monaghan, H18 YT50.

Re: Draft Monaghan County Development Plan 2025-2031

A chara,

Thank you for your authority's work in preparing the draft Monaghan County Development Plan 2025-2031 (the County Development Plan).

The Office of the Planning Regulator (the Office) wishes to acknowledge the considerable work your authority has undertaken in the preparation of the County Development Plan against the backdrop of an evolving national and regional planning policy and regulatory context.

As your authority is aware, a key function of the Office is the assessment of statutory plans to ensure consistency with legislative and policy requirements relating to planning.

The Office has evaluated and assessed the County Development Plan under the provisions of sections 31AM(1) and 31AM(2) of the Planning and Development Act 2000, as amended (the Act) and this submission has been prepared accordingly.

Recommendations issued by the Office relate to clear breaches of the relevant legislative provisions, of the national or regional policy framework and/or of the policy of Government, as set out in the Ministerial guidelines under section 28. As such, 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.



Observations take the form of 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 Planning Authority is requested by the Office to action an observation.

A submission also can include advice on matters that the Office considers would contribute positively to the proper planning and sustainable development of the area. The Planning Authority is requested by the Office to give full consideration to the advice contained in a submission.

Overview

The County Development Plan is being prepared at a crucial time during the process to update the National Planning Framework (NPF) and the Northern and Western Regional Assembly Regional Spatial and Economic Strategy (RSES), which seek to promote the rebalancing of regional development in a sustainable manner, and the enactment of the Planning and Development Act 2024. The County Development Plan has proactively embraced many of the challenges and opportunities identified in the NPF and the 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 (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.

In this context, the Office considers that further work is required in the preparation of the core strategy to identify housing targets in accordance with the Housing Supply Target Methodology for Development Planning, Guidelines for Planning Authorities (2020) (Housing Supply Target Methodology), in order to provide a sound basis for



the implementation of the plan and monitoring against CSO housing completion data in the context of government targets for housing nationally.

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.

Although some of these corrections are likely to affect changes to the core strategy, including the estimation of the requirement for residential zoned lands, the Office generally considers that the approach to zoning is consistent with the compact, sequential and proportionate growth of the towns and villages across the county. It is clear, however, that the County Development Plan more than provides a sufficient supply of zoned land to meet the housing needs of the county, and careful consideration should be given to the introduction of significant additional zoning objectives by way of material alterations, particularly where the land in question is peripherally located and non-sequential in terms of zoned or undeveloped land closer to town centres.

The submission below does, however, raise 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.

The Office has also identified a number of amendments that will be required to ensure that the risk of flooding to people and property is avoided and managed.

As acknowledged in the County Development Plan, Monaghan already 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.

¹ According to chapter 2 core strategy of the draft Plan Between 2012 and 2022 67.3% of all permitted housing granted comprised rural housing.



The Planning Authority will also be aware that the Office's evaluation of the plan is required under section 31AM(2)(a) to address, in particular, matters within the scope of section 10(2)(n) of the Act in relation to climate change. The definition of appropriate settlement boundaries, the zoning of lands for specific uses (section 10(2)(a) of the Act), and the establishment of guiding policies for smaller towns and settlements are vital tools available to the Planning Authority in promoting effective integration of land use and transportation policies and addressing the requirements of section 10(2)(n).

In addition, in the context of the NPF's strategic priority to transition to a low carbon and climate resilient economy, and the statutory obligations of the Climate Action and Low Carbon Development Act 2015, as amended (the Climate Act) and the Climate Action Plan 2024 (Climate Action Plan) the Office has highlighted the need to provide a firmer commitment to prepare a renewable energy strategy and to support the protection and development of electricity infrastructure.

It is within this context the submission below sets out fifteen (15) recommendations and ten (10) observations under the following twelve (12) themes:

Key theme	Recommendation	Observation
Core strategy and settlement	Recommendation 1, 2,	Observation 1
strategy	<u>3, 4</u>	
Sustainable development	Recommendation 5, 6	Observation 2
Housing strategy and relevant	Recommendation 7	Observation 3
policies		
Rural housing and regeneration	Recommendation 8, 9	-
Community and social	-	Observation 4
<u>infrastructure</u>		
Economic development and	Recommendation 10,	Observation 5, 6
employment	<u>11</u>	
Sustainable transport and	Recommendation 12	-
<u>accessibility</u>		



Climate action and renewable	Recommendation 13	-
Energy		
Flood risk management	Recommendation 14	-
Environment, heritage and	Recommendation 15	Observation 7, 8
amenities		
Implementation and monitoring	-	Observation 9
General and procedural matters	-	Observation 10

1. Core strategy and settlement strategy

1.1 Housing and population targets

The Office considers that the total county population projections, as set out at table 2.4 of the County Development Plan, are broadly consistent with the population prescribed for the county in the RSES and the Implementation Roadmap for the NPF. However, the Office notes that the population projections are for the population growth anticipated between 2022-2031, and not for the plan-period.

The Office also notes that the Planning Authority has not prepared a Housing Supply Target for the 2025-2031 plan-period in accordance with the section 28 Housing Supply Target Methodology and instead applies an alternative methodology based on the allocation of the projected population between 2022-2031 to determine housing land requirements.

This approach is not consistent with the Development Plans, Guidelines for Planning Authorities (2022) (the Development Plans Guidelines), which specifies that the methodology in the Housing Supply Target Methodology must be used in meeting the statutory obligations for the core strategy. As a consequence, revisions are required to the core strategy as set out in Recommendation 1 below.

The Office has calculated a housing supply target for the plan period of c.2,385, and can provide further practical advice and technical support in the working out of the core strategy parameters.



Recommendation 1 – Core Strategy and Housing Supply Target

Having regard to the requirement to set out a core strategy in accordance with section 10(2A) and of the Planning and Development Act 2000, (as amended) and, in particular to:

- NPO 36 of the NPF to improve the evidence-base, effectiveness and consistency in the planning process for the housing provision through section 28 guidelines;
- the Development Plans, Guidelines for Planning Authorities (2022) (the Development Plans Guidelines), including section 4.3.1 Population and Housing in the Core Strategy and the Policy and Objective that the core strategy requirements set out in section 10(2A)(c) and (d) of the Act must be applied; and
- the Housing Supply Target Methodology for Development Planning, Guidelines for Planning Authorities (2020) (Housing Supply Target Methodology);

the Planning Authority is required to:

- 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;
- (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;
- (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; and

 (iv) consider consolidating 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.

Appendix A of the Development Plans Guidelines provides a useful reference and illustrative example for the presentation of this information in the core strategy table.

The Planning Authority may also consider it necessary to update the draft Housing Strategy and Housing Needs Demand Assessment in light of the finalisation of the Housing Supply Target in accordance with the methodology as per (i) above.

1.2 Settlement Hierarchy and distribution of growth

The Office is generally satisfied that the positioning of settlements within the county settlement hierarchy is consistent with policies and guidance in the RSES and the settlement typology approach set out in section 4.5.1 of the Development Plans Guidelines.

The distribution of future population growth across Tiers 1 - 4 of the settlement hierarchy provides a strategy that sufficiently responds to the policies and objectives of the NPF and RSES, with growth primarily directed to the top four tiers of the settlement hierarchy and which supports compact growth, regeneration and developing centres of scale consistent with NPOs 3c, 9, 16, 18a of the NPF and RPO 3.1 of the RSES.

With regard to Tier 5 rural settlements and Tier 6 remaining rural area, the Office considers that the outcome of the review of the proposed core strategy at Recommendation 1 should ensure that any reallocated growth is directed to Tiers 1 – 3 in the settlement hierarchy to ensure consistency with the NPF and RSES.



Recommendation 2 – Settlement Strategy

Having regard to the provision of a settlement strategy that supports compact, proportionate and balanced growth across the county, and the regeneration and renewal of rural towns and villages, and in particular to:

- NPO 3c of the NPF and RPO 3.1 of the RSES for compact growth, and
- NPO 9, NPO 18a, and NPO 33 of the NPF for balanced, proportionate and sustainable growth, regeneration and renewal, and the alignment of investment in infrastructure, employment and supporting amenities and services,

the Planning Authority is required to ensure that in revising the proposed core strategy at Recommendation 1, any revised population and housing target growth is directed to the Tier 1 - 3 settlements.

1.3 Core strategy and zoning for residential use

The Office welcomes the inclusion of zoning maps and settlement plans for the five higher order settlements in the County Development Plan.

Having reviewed the detail set out in chapter 2 and chapter 3 of draft County Development Plan, the Housing Needs Demand Assessment, settlement plans for each Tier 1 - 3 town (chapters 10 - 14), and taking account of the Office's calculation of a housing supply target of 2,385 units required over the plan-period, the Office is generally satisfied that a sufficient supply of residential zoned land (Proposed Residential A and B) has been provided within the County Development Plan to accommodate the housing supply targets and associated future population growth.

However, the Office notes that the County Development Plan also includes the extensive Strategic Residential Reserve zoning, particularly in Monaghan Town, which vastly exceeds the quantity of land zoned for proposed residential development. The location of this land in many instances, is peripheral and is



contrary to national and regional objectives to provide for compact growth (NPO 3c of the NPF and RPO 3.2c of the RSES).

In other instances, lands are zoned as Strategic Residential Reserve which are closer to the town centres, and therefore more sequential to lands zoned as Proposed Residential in Monaghan and Carrickmacross. This is contrary to the development of zoned land in a sequential manner.

There are also areas of land zoned Strategic Residential Reserve in Monaghan Town and Castleblayney which are located in areas that are at risk of flooding.

The Office advises therefore that a more focussed approach to zoning lands as Strategic Residential Reserve is required which will assist in forward planning for infrastructure delivery and support compact growth principles in the longer term.

The Office recognises that these lands may represent legacy from previous development plans which predate the current policy framework for compact, sequential and sustainable growth. It is important, therefore that the Planning Authority gives very careful consideration to which of these lands is best placed to ensure the growth of the town in the next plan cycle in accordance with these national and regional policies.

This is likely to require significant re-zoning of peripheral and non-sequential lands that are more difficult to service and do not support the provision of a sustainable transportation and settlement strategy (as per section 1.3.5 of appendix A of the Development Plans Guidelines).

Furthermore, given the location and extent of lands concerned, the Land Use Zoning Objective (LUO 5) would benefit from additional clarity to make it clear that such lands will not be considered for development during the plan-period, including for single dwellings which could undermine the future development potential of the lands and their role as a strategic resource.



Recommendation 3 – Strategic Residential Reserve

Having regard to the quantity of land zoned for Strategic Residential Reserve, the principles of compact growth and the sequential approach, and the co-ordination of land use zoning, infrastructure and services, and in particular to:

- NPO 3c of the NPF and RPO 3.1 and 3.2c of the RSES, compact growth;
- NPO 57 of the NPF requiring implementation of The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009);
- NPO 72a-c of the NPF for the tiered approach to zoning and the policy and objective that land use zoning should be informed by a Settlement Capacity Audit at section 6.2.1 of the Development Plans, Guidelines for Planning Authorities (2022) (the Development Plans Guidelines); and
- the policy and objective for a sequential approach when zoning lands for development at section 6.2.5 of the Development Plans Guidelines,

the Planning Authority is required to:

(i) review the following sites² 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;

² As identified and referenced in appendix 16 Infrastructure Assessment and Settlement Capacity Audit and illustrated on the zoning maps



- f) MT 28;
- g) MT 31;
- h) MT 32;
- i) MT 36;

Carrickmacross

- j) CK 11;
- k) CK 12;
- I) 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; and
- x) BB 18;



(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.

The Planning Authority is advised to liaise with Uisce Éireann and Office of Public Works to address this recommendation.

In addition, the approach to zoning for residential use needs to be refined to reflect the outcome of the revisions to the core strategy at Recommendation 1 and to ensure that the core strategy and associated zoning objectives appropriately apply national and regional policy taking account of any specific local considerations. This includes:

- using densities in the calculation of housing yield that are based on density assumptions consistent with the Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities (2024) (Compact Settlements Guidelines);
- providing for 30% compact growth within the existing built-up footprints of the Tier 1 - 3 settlements in accordance with NPO 3(c) of the NPF and RPO 3.2(c) of the RSES; and
- including the area and potential housing yield of both Residential zoned lands and other lands zoned for a mixture of residential and other uses, as required by section 10(2A)(c) and (d) of the Act for all settlements which include residential and mixed use development land which has the potential to deliver residential development.

The Development Plans Guidelines provide clear guidance in terms of ensuring that sufficient housing lands/sites are provided in development plans based on the housing unit yield of land zoned for residential and a mix of residential and other uses. This is critical in terms of the ability to plan for the timely delivery of physical



and social infrastructure in the right location to serve new housing development, and to support compact and sequential growth.

It is important, therefore, that the core strategy table clearly demonstrates how this is to be achieved, including that the requirement for zoned land is based on density assumptions consistent with the Compact Settlements Guidelines.

The Office accepts that it is reasonable for the County Development Plan to provide a tailored approach to densities when estimating the requirement for zoned land depending on the size and character/function of individual settlements. It is nonetheless important that the consideration and refinement of the assumptions used are consistent with the ranges set out in the Compact Settlements Guidelines, in order to support national and regional objectives for compact and sustainable growth.

The recommended densities in the Compact Settlement Guidelines are not, however, currently reflected in table 2.6 of the core strategy. For example, average densities of 18 units per hectare (gross) for 70% of lands and 10 units per hectare (gross) for 30% of lands have been applied in Monaghan Town and Carrickmacross, and less than this for all other settlements. While the Office acknowledges the topographical constraints in the county, particularly in Monaghan Town, these densities are considered to be unjustifiably low.

Notwithstanding discrepancies between residential land use zoning illustrated on zoning maps, core strategy housing land requirements and zoning identified in the Settlement Capacity Audit (appendix 16) highlighted above, the Office notes that the Infrastructure Assessment identifies all residential zoned lands as either Tier 1 or Tier 2, as defined at appendix 3 of the NPF: A Methodology for a Tiered Approach to Land Zoning.

It is not clear, however, from the Infrastructural Assessment that Tier 2 zoned lands are serviceable within the plan-period as a reasonable estimate of the full cost of delivery of the required infrastructure for the identified zoned lands are not provided. It is critical that there is a reasonable expectation of infrastructure delivery for zoned lands to ensure that infrastructure providers can prioritise lands on which



development will be realised during the plan-period. For example, the Office notes that there may be constraints in the Monaghan Town wastewater network, and as such the planning authority is advised to engage with Uisce Éireann (UÉ) on this matter.

Finally, the Development Plans Guidelines provide for the zoning of residential sites in addition to those required to meet the settlement housing target, which would appear to be in case in your draft County Development Plan. However, the use the Additional Provision of residential lands in a particular settlement, must be clearly set out in the core strategy, and a number of criteria must be considered, as set out at section 4.4.3 of the Development Plans Guidelines.

Recommendation 4 – Residential Land Supply

Having regard to the provision of a sufficient supply of zoned lands to support compact and sustainable growth and the co-ordination of land use zoning, infrastructure and services, and in particular to:

- NPO 3c of the NPF and RPO 3.1 and RPO 3.2c of the RSES for compact growth;
- NPO 35 of the NPF for residential density in settlements;
- NPO 9, NPO 18a, and NPO 33 of the NPF for balanced, proportionate and sustainable growth, regeneration and renewal, and the alignment of investment in infrastructure, employment and supporting amenities and services;
- NPO 72a-c of the NPF for the tiered approach to zoning and the coordination of land use zoning, infrastructure and services, and
- the Development Plans Guidelines for Planning Authorities (2022), including section 4.4 The Core Strategy and Zoning for Residential Use, the policy and objective that the core strategy requirements set out in section 10(2A)(c) and (d) of the Act must be applied; the policy and objective for a



sequential approach to zoning; and the policy and objective for zoned land to be informed by the settlement capacity audit,

the Planning Authority is required to:

- (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) and Recommendation 1 above, and amend the core strategy accordingly;
- (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, and amend the core strategy accordingly;
- (iii) review the Infrastructural Assessment in appendix 16, and engage 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 provide clarity as to whether Tier 2 zoned lands are serviceable within the planperiod in order to fully satisfy the tiered approach to zoning, and review the zoning objectives to ensure that lands that cannot be reasonably or cost effectively delivered within the plan period are not zoned for development; and
- (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.



Observation 1 – Residential land use zoning

The Planning Authority is requested to consider two residential zoning objectives identifying Existing Residential and Proposed Residential, instead of the three identified at section 9.2 Land use zoning (Existing Residential, Proposed Residential A and Proposed Residential B), to provide a consistent approach to zoning objectives and aid understanding of zoning objectives.

Appendix B of the Development Plans, Guidelines for Planning Authorities (2022) provides useful guidance in this regard.

2. Sustainable development

2.1 Development approach for settlements

The Office welcomes the inclusion of zoning maps and settlement plans for each Tier 1 - 3 settlement, and maps for each Tier 4 settlement illustrating a settlement boundary for each, within the County Development Plan, and the inclusion of Objectives SHO 5 and VIO 4 to provide for the preparation of Tier 4 village plans during the lifetime of the plan to provide guidance for development and future growth in accordance with national and regional policy objectives such as NPO 3c of the NPF and RPO 3.1 of the RSES.

While the Office generally supports this approach, the County Development Plan should clearly set out detailed policy objectives for Tier 1 - 3 settlements in respect of key areas for development, infrastructure priorities, natural and built heritage features, key sustainable mobility priorities and any further relevant key future priorities.

In addition, the identification of key future priorities and implementation measures to support the achievement of RSES growth targets (RPO 3.1) for Monaghan Town should be included in chapter 10 of the County Development Plan. Section 7 of this submission letter also discusses sustainable transport and accessibility including the



matter of Local Transport Plans (LTPs) and sustainable mobility plan measures which should be embedded into the County Development Plan.

Observation 2 – Settlement Plans

Having regard to the compact, sustainable and connected growth of settlements throughout the county consistent with NPO 3 and NPO 6 of the NPF and RPO 3.1, RPO 3.2c and RPO 7.20 of the RSES, the Planning Authority is requested to 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).

2.2 Compact growth & regeneration

The Office commends the Planning Authority on successfully securing funding under the Urban Regeneration and Development Fund and Rural Regeneration and Development Fund for projects throughout the county including Dublin Street Regeneration North and South in Monaghan Town, Castleblayney library and Newbliss enterprise and digital hub. These initiatives demonstrate the Planning Authority's commitment to delivering town and village regeneration, in addition to the emphasis on promoting sustainable compact development in the overarching County Development Plan objectives, alongside Urban Regeneration Objectives URO 1 – 6.

Notwithstanding, the Office notes that the core strategy (table 2.5) includes population growth allocated to 20% infill / brownfield lands and 80% to greenfield sites for Tier 1 - 3 settlements which is not consistent with NPO 3c and RPO 3.2 and RPO 3.2(c), as the NPF and RSES require the delivery of 30% of all new homes targeted within settlements within their existing built-up footprints.



The Office notes that reference is made in chapter 10 Settlement Plan for Monaghan Town to regeneration plans and a masterplan for Dublin Street North and South, and Roosky Lands. While objectives MTO 1 - 3 require development proposals to have regard to these strategies, chapter 2 core strategy within the County Development Plan would benefit from the incorporation of some detail from these strategies, if residential development is part of these projects, as referenced at Recommendation 4(i) above.

A key future priority in the RSES for Monaghan Town is to deliver 20% of projected growth through regeneration and renewal of a significant area of the town centre. There are four specific target areas within the town centre whereby regeneration and renewal will be pursued but there are several smaller town centre sites that could also potentially become available for redevelopment. It is not clear from chapter 10 Settlement Plan for Monaghan Town how the delivery of 20% of projected growth through regeneration and renewal of a significant area of the town centre will be achieved.

Without quantifiable data, including the location and quantity of infill, brownfield and town centre opportunity sites, it is not clear how the RSES' key future priority for Monaghan Town nor 30% of future housing requirements within the existing built up footprint of Tier 1 - 3 settlements can be delivered in accordance with NPO 3c of the NPF and RPO 3.1 and RPO 3.2(c) of the RSES.

Measurable data is necessary to facilitate monitoring of the County Development Plan and to establish if the RSES' key future priority for Monaghan Town, 30% target for Tier 1 - 3 settlements and the 20% target for Tier 4 settlements and the rural area has been achieved at the end of the plan-period. While the County Development Plan references the monitoring of the plan strategic objectives including promoting sustainable compact urban forms (Strategic Objective SO 3) this approach could be further strengthened by establishing measurable targets and timelines against which the implementation can be measured and monitored. Section 11 addresses implementation and monitoring.



While future Local Area Action Plan locations are identified on the zoning maps for Monaghan Town, Carrickmacross and Castleblayney, having regard to the legislative changes to be enacted under the recently adopted Planning and Development Act 2024, the Office considers that key opportunity sites should be identified in the County Development Plan and on the zoning maps for the Tier 1 - 3 settlements to clarify their locations and to illustrate the priority areas where infill / brownfield development can be achieved, in accordance with NPO 3c of the NPF and RPO 3.2(c) of the RSES.

The Urban Regeneration Objectives (URO 1 - 6) supporting a range of site activation measures including the Derelict Sites Act 1990, Town Centre First Plans and encouraging collaboration with the Land Development Agency, are welcomed.

The Office notes the Planning Authority's urban regeneration objective URO 4 with regard to the implementation of an Active Land Management Strategy and to maintain and update as required a vacant sites register. To ensure effective implementation, a clear timeline and strategic approach in carrying out the active land management approach and to set measurable targets (perhaps by settlement for Tiers 1 - 4) and timelines against which the implementation can be monitored and measured should be provided. Section 11 addresses implementation and monitoring.

Recommendation 5 - Compact Growth and Regeneration

Having regard to the regeneration and renewal of rural towns and villages, and in particular to:

- NPO 3c of the NPF and RPO 3.1 and RPO 3.2(c) of the RSES for compact growth;
- NPO 6, NPO 18a, and NPO 33 of the NPF for balanced, proportionate and sustainable growth, regeneration and renewal, and the alignment of investment in infrastructure, employment and supporting amenities and services; and



section 6 of the Development Plans, Guidelines for Planning Authorities (2022),

the Planning Authority is required to:

- (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; and
- (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.

2.3 Standards and guidelines

The County Development Plan makes reference to a number of development management standards applicable to development projects, which support the overall objectives in the County Development Plan, including the objective to promote sustainable compact development forms. The Office welcomes the housing density policy HDP 1 requiring a density of units within multi-unit residential schemes in accordance with the Compact Settlements Guidelines. However, the Office has a number of concerns relating to specific guidelines and standards, as follows:

- the density standards in LDRP1 and single dwelling provisions in SDPRP 1 are not consistent with the Compact Settlements Guidelines which support national and regional policy objectives for compact growth. Notwithstanding topographical constraints highlighted at chapter 2 of the County Development Plan, these can be dealt with at a site specific level rather than the blanket adoption of a low density zoning objective (Proposed Residential B) and associated low densities that will result in unsustainable car-dependent development rather than supporting compact growth;
- the public open space standards in RPSP 1 set out at table 15.2 should clarify that the minimum required open space for multi-unit residential development,



according to unit numbers is based on the net site area, to ensure compliance with Policy and Objective 5.1 of the Compact Settlements Guidelines; and

- NPO 13 of the NPF signals a move away from rigidly applied, blanket planning standards in favour of performance based standards where appropriate.
 Prescriptive standards set out in chapter 15 of the County Development Plan, that are above the requirements set out in Ministerial Guidelines, could militate against the principle of promoting appropriate density and compact growth in the higher order settlements, including:
 - private open space requirements (Policy ROSP 2, table 15.3) whereby the minimum private open space standards must be applied as set out in SPPR 2 of the Compact Settlements Guidelines; and
 - table 15.6 Car Parking Standards, whereby it must be clarified that the requirement as stated is for maximum standards.

Recommendation 6 – Development Management Standards

Having regard to the provision of appropriate development management standards consistent with compact and sustainable growth and the provision of sustainable settlement and transportation strategies to reduce greenhouse gas emissions, and in particular to:

- section 10(2)(n) of the Planning and Development Act 2000, as amended; the Climate Action Plan 2024; and the Climate Action and Low Carbon Development Act 2015, as amended;
- NPO 3c of the NPF and RPO 3.2c of the RSES for compact growth;
- NPO 35 of the NPF for residential density in settlements;
- NPO 13 of the NPF for planning and related standards; and
- Policy and Objective 5.1 and the density and open space standards set out in the Sustainable Residential Development and Compact Settlements



Guidelines for Planning Authorities (2024) (Compact Settlements Guidelines),

the Planning Authority is required review and amend the development management standards and policy objectives of Monaghan County Development Plan 2025-2031(the County Development Plan) to:

- (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);
- (ii) define parking standards in the County Development Plan as maximum standards;
- (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; and
- (iv) review the public open space and private open space standards to ensure consistency the Compact Settlements Guidelines.

3. Housing strategy and relevant policies

3.1 Housing need demand assessment

The Office notes that the Housing Strategy set out at chapter 3 of the County Development Plan is informed by the Housing Need Demand Assessment 2023-2031 (HNDA), which is based on population projection scenarios that have since been exceeded, as recognised at section 2.3 of chapter 2 of the County Development Plan.

To ensure the Housing Strategy is informed by a robust evidence-base the Planning Authority should consider updating the HNDA in order to correlate and accurately align future housing requirements, in accordance with NPO 37 of the NPF.



Observation 3 – Housing Need Demand Assessment

The Planning Authority is advised to 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, in accordance with NPO 37 of the NPF.

3.2 Traveller accommodation

The Office welcomes the Housing Strategy Objective (HSO 5) to provide accommodation for all sectors of society, including the Travelling Community in accordance with the current, and any future Traveller Accommodation Plan. The Office notes reference to the existing Gortakeegan halting site at section 3.17.3 of the County Development Plan, which will provide Traveller specific accommodation for those who seek it, subject to availability.

The Office notes, however, that the land use zoning maps do not appear to indicate the location of the existing Gortakeegan halting site to provide for such accommodation, as required under section 10(2)(i) of the Act, and should be amended.

Recommendation 7 - Traveller Accommodation

Having regard to the requirements of section 10(2)(i) of the Planning and Development Act 2000, as amended, the Planning Authority is required to identify in the Monaghan County Development Plan 2025-2031 the use of particular areas for traveller accommodation. This will include the identification of specific locations in the land use zoning maps for the county.



4. Rural housing and regeneration

4.1 Rural housing policy

The County Development Plan recognises the rural character of Monaghan and the dispersed nature of rural housing in the countryside. The Office notes the overarching Strategic Objective (SO 2) to sustain traditional settlement patterns while developing the role and function of each town, village and settlement.

The Office welcomes the categorisation at section 2.13 of the County Development Plan of rural area typologies namely, rural areas under strong urban influence (Category 1) and remaining rural areas (Category 2) in accordance with NPO 19.

While the Office accepts the extent of rural areas under strong urban influence as presented on the core strategy map and accompanying Rural Area under Strong Urban Influence Maps, the Office advises the Planning Authority to monitor rural housing activity in the county and in particular in the area surrounding Ballybay. Implementation and monitoring is addressed in further detail in section 11.

The Office notes that of the 14 serviced villages identified within the Tier 4 Large Village Network, Clontibret and Oram have no available wastewater treatment capacity available at present. The Planning Authority should liaise with UÉ in this regard to determine if there are projects planned, and if they will be delivered during the plan period.

Recommendation 8 - Infrastructure capacity

Having regard to the provision of a rural settlement strategy that supports homes and jobs at locations that can support sustainable development and the coordination of development, infrastructure and services, and in particular to:

- NPO 33 of the NPF to prioritise the provision of new homes at locations that can support sustainable development; and
- NPO 63 of the NPF to ensure the efficient and sustainable use and development of water services infrastructure,



the Planning Authority is required to 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, and if not remove Clontibret and Oram from Tier 4 in the settlement hierarchy.

4.2 Rural regeneration

The Office notes that section 2.12 addresses housing in rural settlements and welcomes Rural Settlements Objective (RSO 1) to support a balanced approach to the development of rural areas to retain vibrancy, to accommodate within the rural area people who are functionally or socially part of the rural community, and to direct urban generated housing demand into established settlements.

In accordance with RPO 3.3 of the RSES, the County Development Plan Objective (RSO 2) seeks to deliver at least 20% of all new housing in rural areas on brownfield sites by encouraging a variety of mechanisms including the renovation of vacant or derelict dwellings, and the redevelopment of sites containing agricultural or industrial buildings.

The Office considers that further clarification and/or strengthening of policies RSO 1 and RSO 2 is required to ensure that new housing in serviced rural villages and settlements is favoured in the first instance, in preference to the open countryside. Without such policy support it is unclear how the 20% target for the delivery of all new housing in rural areas on brownfield sites can be achieved, which may include proactive land management, site acquisition and assembly and the preparation of development briefs to bring forward lands that might not otherwise be developed.

In addition, the Office notes that Tier 4 village plans will be prepared during the lifetime of the County Development Plan (SHO 5) which will provide an opportunity to clarify how the 20% target for the delivery of all new housing in rural areas on brownfield sites will be achieved, and to strengthen the delivery of regeneration and renewal, consistent with RPO 3.4 of the RSES, and the delivery of development within the built up footprint. The inclusion of timeframes for the delivery of the Tier 4 village plans would further support the delivery of NPO 16 of the NPF through the



identification of sustainable targeted measures that address vacant premises and deliver sustainable reuse and regeneration outcomes.

Recommendation 9 - Rural Regeneration

Having regard to the regeneration of the county's rural villages (Tier 4), rural settlements (Tier 5) and remaining rural area (Tier 6) and in particular to:

- NPO 16 and NPO 18b of the NPF for the regeneration of rural villages and to provide serviced sites with appropriate infrastructure; and
- RPO 3.3, RPO 3.4 and RPO 3.7 of the RSES for the regeneration and revitalisation in rural areas and to support the delivery of new housing on brownfield sites,

the Planning Authority is required to:

- (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; and
- (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.

5. Community and social infrastructure

5.1 Community facilities and services

The Office welcomes the community section of the County Development Plan which has a key role to play in the creation of a healthy and inclusive community. The Office notes that the development of effective community and social infrastructure is supported through the zoning and strategic objectives included in the settlement plans. Furthermore, the Office understands that a flexible and supportive approach will be adopted towards proposals for



community facilities on suitable sites within other zoning categories (e.g. Residential, Existing Commercial and Recreation and Amenity). The Office welcomes the intention to direct any such proposals to locations within the development limits of settlements, which will support active travel and sustainable settlements.

The Office notes that the objective of the Community Facilities and Services zoning (LUO 8) is to protect, provide and improve community facilities and services. The principal permitted uses are community, civic, religious, medical / health, educational facilities and ancillary uses such as playing fields and car parks, with other uses such as residential open for consideration.

The Office considers that the range of uses open for consideration on the Community Facilities and Services zoning could be curtailed especially regarding residential uses to better reflect the intent of the zoning objective.

Observation 4 - Community Facilities and Services Land Use Zoning

Having regard to:

- the objective of the Community Facilities and Services zoning (LUO 8);
- the range of uses normally permitted and open for consideration within the Community Facilities and Services zoning as provided for in the Land Use Zoning Matrix (table 9.2) in chapter 9;
- National Strategic Outcome 10 Access to Quality Childcare, Education and Health Services; and
- section 6.2.1 of the Development Plans, Guidelines for Planning Authorities (2022) for zoning in the development plan,

the Planning Authority is requested to:

 (i) review the range of uses open for consideration with the Community Facilities and Services zoning; and



 (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.

Alternatively, the Planning Authority could provide an appropriate policy framework for the consideration of development proposals through the development management system.

6. Economic development and employment

6.1 Employment zoned land

The Office welcomes the inclusion of appendix 17 Review of Industry, Enterprise and Employment Lands which estimates that approximately 384 hectares of Industry, Enterprise and Employment zoned lands are undeveloped, and these lands can accommodate a job growth target of 2,345 over the plan-period, providing for choice, variety and flexibility.

In terms of consistency with national planning policy, it is critical that Employment zonings do not conflict with the National Strategic Outcomes in the NPF for compact growth, sustainable mobility and transition to a low carbon and climate resilient society by facilitating development in areas poorly served by public transport.

As set out at section 6.2.5 of the Development Plans Guidelines, an evidence-based approach to zoning for employment development is a critical part of the County Development Plan preparation process. In this respect, the Office considers that further consideration is required to ensure that there is clear and robust evidence and rationale underpinning the location and extent of each area zoned for Employment purposes.

In particular, the lands zoned Industry, Enterprise and Employment west of Carrickmacross and north of Castleblayney are in peripheral locations outside the CSO settlement boundaries, and it is not clear from the Infrastructure Assessment and Settlement Capacity Audit (appendix 16 of the County Development Plan) whether the lands are capable of being serviced during the plan-period. In addition,



an area of the lands to the north of Castleblayney is also identified as at risk of flooding.

Furthermore, the Office notes that although the scale of Employment zonings in each Tier 1 – 3 settlement broadly follows the settlement hierarchy set out in chapter 2 of the County Development Plan, the extent of Employment zoned lands in Castleblayney marginally exceeds Employment land zoned in Carrickmacross. However, Carrickmacross is anticipated to have greater population growth over the plan-period and is recognised in the RSES as having strategic potential with important sub-regional functions.

Appendix 16 Infrastructure Assessment and Settlement Capacity Audit of the County Development Plan identifies all Employment zoned land as either Tier 1 or Tier 2 as defined in appendix 3 A Methodology for a Tiered Approach to Land Zoning of the NPF. As set out at section 2.4 above, it is not clear from the Infrastructural Assessment that Tier 2 zoned lands are serviceable within the plan-period as a reasonable estimate of the full cost of delivery of the required infrastructure for the identified zoned lands are not provided. It is critical that there is a reasonable expectation of infrastructure delivery for zoned lands to ensure that infrastructure providers can prioritise lands on which development will be realised during the planperiod.

The County Development Plan includes an Economic Development Objective (EDO 7) to promote the use of appropriate lands at Lough Egish for the development of employment generating, industrial and other such uses to enhance and contribute to its growth as a centre for industrial development. The Office notes that although lands are not zoned at Lough Egish, the existing facility comprises of approximately 25 hectares of land, similar to the extent of Employment lands zoned within Ballybay, and the County Development Plan objective EDO 7 aims to promote and enhance its growth as a centre for industrial development.

A policy framework for the facility at Lough Egish should, therefore, be considered by the Planning Authority to provide clarity regarding the consideration of any future development proposals on the lands, and to establish specific development



management and sustainable transport objectives for the area in accordance with NPO 10 and NPO 23 of the NPF and RPO 4.24 of the RSES.

Recommendation 10 - Employment Zoned Land

Having regard to the provision of employment at locations that can support compact and sustainable development and the co-ordination of land use zoning, infrastructure and services, and in particular to:

- section 10(2)(n) of the Planning and Development Act 2000, as amended, concerning the promotion of sustainable settlement and transport strategies and associated mandatory targets for greenhouse gas emissions reduction targets under the Climate Action and Low Carbon Development Act (2015) as amended;
- NPO 74 of the NPF and the National Strategic Outcomes for compact growth, sustainable mobility and transition to a low carbon and climate resilient society;
- NPO 72a-c of the NPF and associated NPF appendix 3, tiered approach to zoning;
- NPO 57 of the NPF requiring implementation of The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009);
- NPO 10b of the NPF to identify suitable areas for strategic employment development and the Development Plans, Guidelines for Planning Authorities (2022) in respect of the policy and objective under section 6.2.1 for zoning to be informed by the settlement capacity audit, the policy and objective under section 6.2.3 for the sequential approach to zoning, and section 6.2.5 for the provision of an evidence and rationale underpinning the zoning of land for employment purposes; and
- NPO 23 of the NPF and RPO 4.24 of the RSES to facilitate the rural economy while maintaining and protecting the natural landscape and built heritage;



the Planning Authority is required to:

- (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; and
 - (c) CB IEE24,
- (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 planperiod, including a reasonable estimate of the full cost of delivery of the required infrastructure; and
- (iii) include a policy framework for the industrial development area at Lough Egish including specific objectives for development management and sustainable transport.

Where an evidence-based rationale consistent with national and regional policy cannot be provided for these, or any other Employment zonings, the subject zoning objective should be removed from the Monaghan County Development Plan 2025-2031.

6.2 Retail

The Office welcomes that the retail hierarchy set out at section 4.6.1 of the County Development Plan is consistent with the settlement hierarchy, and that the location of the majority of future retail developments in the county will be focussed on the town centres of Tier 1 and 2 settlements consistent with national and regional policy

³ As identified on the Castleblayney (Industry/Enterprise/Employment Lands) Settlement Capacity Audit (May 2024)

⁴ As above



objectives to support the regeneration and renewal of towns and the compact and the sequential approach.

The Office notes that the land use zoning matrix (table 9.3) provides for retail warehousing as a permitted use within the Existing Commercial zoning. As the Existing Commercial land use zoning objective is to provide for established commercial development and facilitate its appropriate expansion, this would provide for the expansion of existing retail warehouse facilities in peripheral and car dependent locations on the edge of the towns.

In accordance with the Retail Planning Guidelines for Planning Authorities (2012) there should in general be a presumption against further development of out-of-town retail parks, unless the development plan and retail strategies identify whether there is a need for their provision. In this regard, the Office considers that retail warehousing should not be permitted within the Existing Commercial zoning, and the land use zoning matrix (table 9.3) should be amended accordingly.

Recommendation 11 - Retail Warehousing

Having regard to the need to prioritise retail provision within 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 for Planning Authorities (2012);
- NPO 74 of the NPF and the National Strategic Outcomes for compact growth, sustainable mobility and transition to a low carbon and climate resilient society; and



 section 10(2)(n) of the Planning and Development Act 2000, as amended, and the Climate Action Plan 2024 and the Climate Action and Low Carbon Development Act 2015, as amended,

the Planning Authority is required to amend the land use zoning matrix (table 9.3) to ensure that retail warehousing is not permitted on Existing Commercial zoned land.

6.3 Rural economy & tourism

The Office acknowledges the importance of the rural economy and tourism to the county and that the County Development Plan gives particular attention to this sector, consistent with NPO 23 of the NPF, and RPO 4.7 and RPO 4.8 of the RSES.

The Office welcomes tourism objective TMO 6 and TMO 7 of the County Development Plan which support the RSES key future priority for the development of the Ulster Canal Greenway. The Office notes tourism objectives TMO 8 and TMO 9 support the development of tourism accommodation. However, as written, TMO 8 does not encourage the location of such facilities in the first instance within towns where such uses and development could contribute to a potential reduction in town centre vacancy rates and encourage town centre regeneration in accordance with NPO 16 of the NPF.

Observation 5 – Rural Tourism

The Planning Authority is advised to 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.

The NPF acknowledges the key role the planning process has to play in realising the potential of the extractive industry and the importance of identifying and protecting important reserves of aggregates and minerals from development that might



prejudice their utilisation. Section 4.9 of the County Development Plan sets out the economic policy objectives for the extractive industry however, no map to identify the location of these resources within the county is included. The Office considers that this would be a welcome addition to the County Development Plan and the policy objectives set out in this regard.

Observation 6 – Extractive Industry

Having regard to:

- NPO 23 of the NPF; and
- Quarries and Ancillary Activities Guidelines for Planning Authorities 2004,

the Planning Authority is advised to include a map to show the location of quarries and minerals across County Monaghan.

7. Sustainable transport and accessibility

The Office welcomes the overarching infrastructure strategic objective (TISO 1) to promote and facilitate a sustainable, efficient, and integrated transport system and transport policy TP 1 to develop an ITP for the county.

The Office notes that a number of objectives and policies support a modal shift from car based travel to other modes (TO 4, ATP 3, ATP 9, PTO 3), however there are no specific modal share targets defined for the county, and at the local level for settlements and the rural area.

The Office welcomes the preparation of LTPs for Monaghan Town and Carrickmacross, and sustainable mobility plans for Castleblayney, Clones and Ballybay (Objective TP 2) which will be key to achieving more sustainable transport patterns. The preparation of these plans provides an opportunity for the inclusion of how modal share targets for the plan period can be achieved for the settlements (Tier 1 - 3), which should be translated into policies / objectives in the County Development Plan alongside baseline figures for modal share and modal share



targets for the plan period at a county level and at an aggregate level for rural villages and the rural area (Tier 4 - 6).

Further, the Planning Authority should consider translating specific measures / proposals from the ITP, LTPs and sustainable mobility plans into the County Development Plan to give them statutory weight and clarity on the settlement zoning maps.

Recommendation 12 - Sustainable mobility

Having regard to the provision of a sustainable transport strategy and the transition to a low carbon and climate resilient society including the reduction of greenhouse gas emissions, and in particular to:

- section 10(2)(n) of the Planning and Development Act 2000, as amended, concerning sustainable settlement and transport strategies;
- RPO 6.27 and RPO 6.28 of the RSES for Local Transport Plans (LTPs);
- NPO 74 of the NPF and National Strategic Outcome 5 for sustainable mobility; and
- NPO 27 for safe and convenient alternatives to the car, NPO 54 to reduce our carbon footprint, and NPO 64 for improved air quality,

the Planning Authority is required to:

- (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 in the Monaghan County Development Plan 2025-2031 (the County Development Plan);
- (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; and
- (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.

8. Climate action and renewable energy

8.1 Climate action

The Office welcomes the Planning Authority's support for the implementation of the county's Climate Action Plan (Objective CAO 6) and the encouragement of the implementation of mitigation and adaptation measures to address climate change (Objective CAO 8) including the implementation of the measures identified for the Monaghan Town Decarbonisation Zone (Objective CAO 7). However, addressing the recommendation above for sustainable mobility will be an important factor in mitigating climate change consistent with the objectives of the Monaghan Climate Action Plan.

8.2 Renewable energy and infrastructure

The Office welcomes the objective to promote a broad spectrum of renewable energy development (Objective REO 4) and accompanying development management standards (Policy REP 1). The Office notes that a Renewable Energy Strategy for the county will be prepared over the lifetime of the plan (Objective REO 2). However, having regard to the urgent need to meet national targets for renewable energy under the Climate Action Plan, the Office considers that a firmer commitment to prepare the strategy is required.

Furthermore, the Office notes that the landscape character map, which will inform the renewable energy strategy dates from 2008, and will also need to be reviewed as part of that process.

The Office welcomes the recognition at section 15.20 of the County Development Plan that the development of secure and reliable electricity transmission infrastructure is critical to support economic development, and must be balanced against a requirement to protect the environment.



NSO 8, NPO 54 and NPO 55 of the NPF and RPO 4.17 of the RSES 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.

The Office considers that policies EGP 1 and EGP 2 of the County Development Plan are not consistent with these national and regional objectives, the Government's energy security strategy, Energy Security in Ireland to 2030, nor the requirements of Article 16(f) of the Renewable Energy Directive (EU) 2023/2413 due to their restrictive nature which has the potential to impede the development of critical infrastructure of strategic national and regional importance.

Furthermore, the Office appreciates the intention to provide a policy framework which protects the local environment and character however, there is no justification to provide for circumstances at section 15.20 a) to j) where electricity and gas infrastructure specifically will be resisted as these are addressed in the following policies of the County Development Plan:

- a) adverse impacts on amenities and surrounding landscape are dealt with at Objective HCLO 6 and Policy HCLP 2;
- b) adverse impacts on residential amenities are dealt with at Policy RAP 1;
- c) cumulative adverse visual impact across the local landscape is dealt with at Objective HCLO and Policies HCLP 1, HCLP 2 and HCLP 3;
- d) adverse visual impact on Areas of Primary and Secondary Amenity, scenic routes and any other designated scenic landscapes is dealt with at Objective HCLO 8 and Policies HCLP 1, HCLP 2, HCLP 3, PAP 1 and SAP 1;
- e) adverse impacts on nature conservation, ecology, soil, hydrology, groundwater, archaeology, built heritage and public rights of way are dealt with at Objectives HCLO 3, NBHO 5, PMPO 7, REO 6, WPO 1 and Policies ACP 1, PMP 1, DLP 1 and DLP 2; and
- f) adverse impact on the road network is dealt with at Objectives TO 6, NRP 1 and Policies RRP 4 and UARP 6.



Similarly, Policy EGP 2 is not necessary as the County Development Plan contains appropriate policies addressing potential adverse impacts as described above.

Recommendation 13 - Renewable Energy Strategy and Infrastructure

Having regard to the national requirement for a sustainable renewable energy supply and the transition to a low carbon and climate resilient society, and in particular:

- section 10(2)(n) of the Planning and Development Act 2000, as amended;
- the Climate Action and Low Carbon Development Act 2015, as amended and the Climate Action Plan 2024;
- NPO 54 of the NPF to integrate climate action into the planning system in support of national targets for climate policy mitigation and adaptation objectives, as well as targets for greenhouse gas emissions reductions;
- NPO 55 of the NPF to promote renewable energy use and generation at appropriate locations;
- RPO 4.17 of the RSES to position the region to avail of the emerging global market in renewable energy;
- the forthcoming Methodology for Local Authority Renewable Energy Strategies;
- the Development Plans, Guidelines for Planning Authorities (2022); and
- the Wind Energy Development Guidelines (2006),

the Planning Authority is required to:

(i) amend Objective REO 2 in chapter 8 of the Monaghan County Development Plan 2025-2031 (the County Development Plan) 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;

- (ii) review the landscape character map in the County Development Plan in tandem with the preparation of the renewable energy strategy;
- (iii) amend section 15.20 in chapter 15 of the County Development Plan 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; and

(iv) omit Policy EGP 2 in chapter 15 of the County Development Plan.

9. Flood risk management

The Office welcomes the preparation of the Strategic Flood Risk Assessment (SFRA) (appendix 19 to the County Development Plan), in accordance with NPO 57 of the NPF and The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) (Flood Guidelines), and Objective FRMO 1 to fully implement and support, in conjunction with the Office of Public Works, the provisions of the EU Flood Risk Directive 2007/30/EC, the European Communities (Assessment and Management of Flood Risks) (Amendment) Regulations 2015, and the Flood Guidelines.

The Office also welcomes the identification of flood risk areas on the land use zoning maps for the towns and village maps. However, the Office has identified some inconsistencies between these and the maps included in the appendix A to the SFRA In addition, a number of sites are zoned for vulnerable land uses that appear to be located within the flood zones that have not passed the plan-making justification test. The suitability of these zoning objectives should be reviewed in accordance with the Flood Guidelines. Where the lands do not pass the plan-making justification test, these will need to rezoned to accommodate only appropriate uses.

The Office welcomes the inclusion of plan-making justification tests, however it is noted that some of the tests relate to lands that would not meet the criteria for



justification tests due to their location and the apparent availability of alternative sites to accommodate these uses.

Land use zonings for undeveloped lands which have not satisfied all criteria of the plan-making justification test in Flood Zone A should be zoned for water compatible use, and in Flood Zone B should be zoned water compatible, or substituted for a land use appropriate to the level of flood risk.

In addition, the land use zoning matrix and the village maps provide that a range of vulnerable uses are open for consideration on undeveloped zoned lands which are identifed as being at risk of flooding.

For existing development, when avoidance or substitution is not possible and all criteria cannot be satisfied, a policy should be included to limit development to minor extensions only in accordance with section 5.28 of the Flood Guidelines and limit new development accordingly.

Recommendation 14 - Flood Risk Management

Having regard to the need to manage flood risk and, in particular:

- NPO 57 of the NPF requiring implementation of The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) (Flood Guidelines) and integration of sustainable water management solutions; and
- RPO 3.10 of the RSES, flood risk management and integration of sustainable water management solutions,

the Planning Authority is required to:

 (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;



(ii) review the following undeveloped sites⁵ 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;
- (I) CMFRA25;
- (m) CMFRM26;

Castleblayney:

- (n) CBFRA1;
- (o) CBFRA2;
- (p) CBFRA9;

⁵ As identified and referenced in the Maps set out in Appendix X of the Strategic Flood Risk Assessment (Appendix 19 to the County Development Plan)



- (q) CDFRA10;
- (r) CDFRA12;

Clones:

- (s) CSFRA26;
- (t) CSFRA4;
- (u) CSFRA15;
- (v) CSFRA18;

Ballybay:

- (w) BBFRA15;
- (x) BBFRA23;
- (ii) 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;
- (iii) 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;
- (iv) review and amend the flood zone maps to ensure the correct datasets and probability extents have been illustrated;
- (v) accurately overlay the flood zone maps with the land use zoning maps and village maps; and
- (vi) include a policy at section 15.22.8 of chapter 15 Development Management Standards to require compliance with section 15.22.8.

The Planning Authority should liaise with the Office of Public Works to address this recommendation.

⁶ This refers to sites CL IEE1 and CL IEE3 identified on the Clones (Industry/Enterprise/Employment Lands) Settlement Capacity Audit (May 2024)



10. Environment, heritage and amenities

10.1 Rights of way/ record of protected structures

Chapter 6 Heritage, Conservation and Landscape and section 8.1 of chapter 8 Environment, Energy and Climate Change address the mandatory objectives relating to the protection and conservation of the natural and built environment.

Section 6.17.2 identifies 20 Architectural Conservation Areas (ACAs) in Monaghan Town, Carrickmacross, Clones and Glaslough village, and Objective ACO 1 commits to the carrying out of a comprehensive review of the ACAs within the county during the lifetime of the County Development Plan. The Office considers there is merit to the inclusion of ACAs within the land use zoning maps for the towns and the village map for Glaslough which would set a strong precedent to conserving and enhancing those settlements.

Observation 7 – Architectural Conservation Areas

The Planning Authority is requested to consider the inclusion of 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.

Section 10(2)(o) of the Act requires public rights of way to be located on both a map and on a list appended to the plan. The Office notes that Objective CFO 24 seeks to identify and preserve existing rights of way to recreational areas and to commence the process of mapping and listing them over the lifetime of the County Development Plan under the provisions of section 14 of the Act. The Office considers that clear timeframes should be included in Objective CFO 24. The Planning Authority's attention is drawn to examples of good practice identified in the Office's Case Study Paper on this subject matter.



Observation 8 – Public Rights of Way

Having regard to the requirements of section 10(2)(o) of the Planning and Development Act 2000, as amended, the Planning Authority is requested 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 Monaghan County Development Plan 2025-2031 by way of variation.

10.2 Environmental assessments

The Office notes that the Strategic Environmental Assessment report concludes that the adoption of the environmental mitigation measures integrated into the County Development Plan will prevent, reduce and fully offset potential negative environmental effects due to the implementation of the County Development Plan and that no further mitigation measures are required. It is also concluded that the County Development Plan will not have any likely, significant transboundary impacts.

The Natura Impact Report (NIR) identifies measures as Additional Environmental Mitigation at table 5-2 to mitigate potential adverse effects of the County Development Plan and concludes the County Development Plan individually or combination with other plans or projects would not adversely affect the integrity of any European site in view of the sites' Conservation Objectives, and that all potential effects that may be transmitted to designated sites in Northern Ireland will also be appropriately mitigated with the adoption of the defined mitigation measures.

The Office notes, however, that the additional mitigation measures identified for Objectives SSO 12 and URO 5 are not integrated in the County Development Plan.

In addition, the information notified to the Office does not appear to include the mandatory appropriate assessment screening determination referenced at section 3.5 of the NIR.



Recommendation 15 - Natura Impact Report

Having regard to:

- NPO 75 of the NPF to ensure that development plans are subject to the relevant environmental assessment requirements;
- Article 6(3) of the Habitats Directive;
- Part XAB of the Planning and Development Act 2000, as amended; and
- the Appropriate Assessment of Plans and Projects in Ireland Guidance for Planning Authorities (2010),

the Planning Authority is required to:

- (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; and
- (ii) produce a stage 1 appropriate assessment screening determination.

11. Implementation and monitoring

The Office welcomes section 16.1 of the County Development Plan which provides for the delivery by the Planning Authority of core strategy monitoring on an annual basis in accordance with section 10.3 of the Development Plans Guidelines and plan objectives to be monitored and reported on in the two year progress report by the Chief Executive on the County Development Plan in accordance with section 15(2) of the Act.

The Office advises the Planning Authority to set clear targets and provisions for monitoring and implementation of the County Development Plan, in particular for the areas of compact growth, regeneration, rural housing and regeneration, and sustainable transport.

The Office also notes that a range of objectives and policies contain text to the effect that the objective/policy will be implemented '*subject to the availability of resources*'



or 'as resources allow', for example Objectives REO 2, REO 9, GIO 2, ACO 1, and CFO 24. The Office considers that this text should be removed as the implementation of the objective / policy is undermined by its inclusion and is not consistent with section 5.1 of the Development Plans Guidelines.

Observation 9 – Implementation and Monitoring

Having regard to the effective implementation and monitoring of the Monaghan County Development Plan 2025-2031 (the County Development Plan), and in particular to sections 10.3 and 5.1 of the Development Plans, Guidelines for Planning Authorities (2022), the Planning Authority is advised to:

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

The Office of the Planning Regulator's Paper on Development Plan Monitoring, Measuring What Matters (2024) provides a useful reference for measuring and monitoring planning outcomes; and



(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.

12. General and procedural matters

12.1 Inconsistencies

It is critical that there is consistency between the residential land use requirement in the core strategy, the Infrastructure Assessment and Settlement Capacity Audit and the zoning maps to provide a clear and robust evidence base for the zoning of land.

The Office notes discrepancies between residential and employment land identified on the zoning maps and sites identified in the Infrastructure Assessment and Settlement Capacity Audit. For example, employment lands to the west of Carrickmacross, illustrated on the zoning map (CKDP1), have not been assessed as part of the Infrastructure Assessment and Settlement Capacity Audit.

Observation 10 – Mapping Inconsistencies

The Planning Authority is advised to address discrepancies between residential and employment land identified on the zoning maps and sites identified in the Infrastructure Assessment and Settlement Capacity Audit.

Summary

The Office requests that your authority addresses the recommendations and observations outlined above. As you are aware, the report of the Chief Executive of your authority prepared for the elected members under section 12 of the Act must summarise these recommendations and the manner in which they will be addressed.

In accordance with section 12(5)(aa), where the Planning Authority decides not to comply with any of the Office's recommendations made in the County Development Plan and report, they shall inform the Office, by notice in writing containing the reasons for the decision.



At the end of the process, your authority is required to notify this Office within five working days of the decision of the Planning Authority in relation to the County Development Plan. Where your authority decides not to comply with the recommendations of the Office, or otherwise makes the plan in such a manner as to be inconsistent with the recommendations of the Office, the Chief Executive must inform the Office accordingly and state the reasons for the decision of the Planning Authority.

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

Yours sincerely,

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Anne Marie O'Connor

Deputy Regulator and Director of Plans Evaluations