



Oifig an
Rialaitheora Pleanála
Office of the
Planning Regulator

2nd July 2026

Senior Executive Planner,
Forward Planning Section,
Cavan County Council,
Farnham Centre,
Farnham Street,
Cavan Town,
H12 C9K1.

**Re: Proposed Variation No. 1 to the Cavan County Development Plan 2022-
2028**

A chara,

Thank you for your authority's work on preparing the Proposed Variation No. 1
(proposed Variation) to the Cavan County Development Plan 2022-2028
(Development Plan).

As Cavan County Council (Planning Authority) is aware, a key function of the Office of the Planning Regulator (Office) is to evaluate and assess statutory plans to ensure consistency with legislative requirements and national and regional planning policy. The Office has undertaken this evaluation and assessment pursuant to Part 3 of the Planning and Development Act 2024 (Act) and its functions under section 546, and this submission sets out the outcome.

In this context, the submission includes recommendations and observations. Recommendations arise where the Office identifies clear inconsistencies with legislative provisions or policy frameworks and are intended to be addressed to ensure compliance. Observations highlight areas where further clarification, justification, or refinement would strengthen the plan. The submission may also include advice to support the proper planning and sustainable development of the area.

Following adoption of the Variation, the Office will carry out a further assessment under section 63 of the Act.

1. Overview

The proposed Variation introduces a number of changes to the Development Plan to support the implementation of the NPF Implementation: Housing Growth Requirements (2025) (Housing Growth Guidelines), most notably the zoning or rezoning of lands in nine settlements throughout County Cavan in order to provide for the development of housing. Amendments are also proposed to the Development Plan to reflect the Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities (2024) and the Planning Design Standards for Apartments, Guidelines for Planning Authorities (2025).

The following recommendations and observations set out below are intended to support the Planning Authority in further strengthening the proposed Variation and ensuring its effective implementation:

Subject	Recommendation	Observation
Implementation of housing growth requirements	-	Observation 1
Flood risk management	Recommendation 1	-
Transportation	Recommendation 2	Observation 2

2. Implementation of housing growth requirements

The Office notes that while the housing supply target of 666 units per annum for Cavan has not increased to 2034, the Planning Authority recognises Policy and Objective 2 of the Housing Growth Guidelines in relation to the zoning of land to provide for up to 50% additional residential development over the life of the plan. In this context, the Planning Authority proposes new land zonings to accommodate residential development in nine settlements throughout County Cavan, including: Cavan Town, Virginia, Ballyjamesduff, Bailieborough, Kingscourt, Cootehill, Belturbet, Mullagh and Ballyconnell, where a total of 97 ha is proposed for Proposed Residential and 4 ha for Proposed Low Density. The Office notes however that the

associated yield related to the individual sites has not been specified in the Settlement Capacity Audit (SCA), and the inclusion of same would improve clarity and transparency.

In addition to the above, section 2.4 of the Housing Growth Guidelines states that SCAs should specify enabling infrastructure including public transport capacity and, in the case of enabling social infrastructure, schools provision and community facilities. The Office notes however that the SCA for Cavan does not include information with respect to such enabling infrastructure.

It is important that proposed residential sites are identified in locations that can support sustainable development, particularly walking and cycling, thereby reducing reliance on private modes of transport. The Office notes that while footpath access may be stated as either being present or proposed as part of the development of a particular site in the SCA, there are no continuous footpaths between the site and the centre of the settlements in a number of cases, which would then result in the promotion of car-based travel. Such is the case for example, with respect to Sites B and D which are located circa one kilometre to the southeast of the centre of Mullagh. The Planning Authority should therefore undertake a full and comprehensive review of the SCA with respect to each proposed development site to determine whether a continuous footpath exists from the identified sites to the centre of the relevant settlement. It is important that pedestrians are provided with a safe walking route between residential areas and the settlements with which they are connected in order to promote active travel in favour of more car dependent travel behaviour.

Observation 1 - Housing Growth Targets

Having regard to and having considered:

- section 3.3 of the Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities (2024) related to densities;
- section 1.2.2 of the Development Plans, Guidelines for Planning Authorities (2022) with respect to Settlement Capacity Audits (SCAs); and

- section 2.4 of the NPF Implementation: Housing Growth Requirements (2025) with respect to SCAs,

the Planning Authority is advised to:

- (i) update the Core Strategy Table with regard to the quantum of land (ha), the associated densities (gross/ net) and housing yield (units);
- (ii) update the SCA to provide details on the quantum (ha), density (gross / net) and housing yield (units) of each identified site along with information with respect to public transport (routes / nodes) and the location of social, community and cultural facilities; and
- (iii) review the SCA with respect to each proposed development site to indicate whether a continuous footpath exists from each site to the centre of the relevant settlement. In the event that such a continuous footpath does not exist, the Planning Authority should confirm that such an important piece of infrastructure can be provided during the life of the plan.

3. Flood risk management

With regard to Site A in Mullagh (Proposed Residential), the EPA Water Flow Network data indicates a watercourse running parallel and circa 30 meters to the south of the southern boundary of the proposed development site. However, the extent of this watercourse is unclear and therefore it is difficult to determine if there is any flood risk associated with Site A.

Recommendation 1 - Flood Risk Management

Having regard to flood risk management and having considered:

- NPO 78 of the NPF related to flood risk; and
- The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) (Flood Guidelines),

the Planning Authority is recommended to:

- (i) undertake Stage 1 (Flood risk identification), Stage 2 (Initial flood risk assessment) and Stage 3 (Detailed flood risk assessment) as set out in section 2.21 of the Flood Guidelines, with respect to Site A at Mullagh, due to the presence of an unmapped watercourse to the south of this site; and
- (ii) where it is determined that any part of Site A, Mullagh is located within either Flood Zone A or Flood Zone B and the Plan Making Justification Test has not been passed, the Planning Authority should re-zone the relevant part of Site A for an appropriate use consistent with the Flood Guidelines. In the interests of clarity, highly vulnerable development should not be facilitated within Flood Zone A or B, or less vulnerable development in Flood Zone A.

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

4. Transportation

Sites A, B and C (a ringfort) to the north of Virginia are located within an Emerging Preferred Option Bypass Corridor as identified in the Development Plan. The Office understands that since the adoption of the Development Plan no new route or amendment to this bypass corridor has been identified. The Office therefore has concerns relating to the location of land use zonings within a bypass corridor for the N3 Virginia Bypass that has been identified as a specific project in both Project Ireland 2040: National Development Plan 2021-2030 and Regional Policy Objective (RPO) 6.7 of the Regional Spatial and Economic Strategy (RSES) for the Northern and Western Regional Assembly. Furthermore, section 2.9 of the Spatial Planning and National Roads Guidelines for Planning Authorities (2012) clearly states that

...the zoning of land, must not compromise the route selection process, particularly in circumstances where road scheme planning is underway and potential route corridors or upgrades have been identified.

Recommendation 2 - Virginia Bypass

Having regard to the extent of proposed national infrastructure projects and having considered:

- Project Ireland 2040: National Development Plan 2021-2030 related to the N3 Virginia Bypass;
- RPO 6.7 of the RSES related to a national commitment to progress the N3 Virginia Bypass; and
- section 2.9 of the Spatial Planning and National Roads Guidelines for Planning Authorities (2012), where the zoning of land must not compromise route selection processes,

the Office recommends that the Planning Authority clarifies whether any amendments have been made to the Emerging Preferred Option Bypass Corridor as identified in the Cavan County Development Plan 2022-2028 (Development Plan) and to provide details of same, as relevant.

Consequent to this clarification or update, the Office recommends that the Planning Authority removes any proposed land use zonings that are located within the bypass corridor as identified in the Development Plan or, where there have been changes to the emerging bypass corridor to a location outside of Sites A, B and C to the north of Virginia, clarity should be provided in respect of that amendment.

The Office notes and welcomes that a Local Transport Plan (LTP) is being prepared for Cavan Town. However, as the LTP has not yet been finalised it is unclear how the location of the proposed residential sites in Cavan Town relate to the emerging LTP. The Office notes RPO 6.27(a) of the RSES wherein it states (in relation to a number of settlements, including Cavan Town) that the 'LTP will inform the urban area plans, development plans, local area plans and other planning framework documents'. Furthermore, RPO 6.28 of the RSES states that policies, objectives and measures from LTPs shall be incorporated into development plans.

Taking account of the above, the Office considers it reasonable and appropriate that the Planning Authority would vary the Development Plan when the LTP has been finalised in order to ensure that both the measures identified in the LTP and the proposed residential sites in the proposed Variation with respect to Cavan Town, align with each other.

Observation 2 - Local Transport Plan

Having regard to RPO 6.27(a) and RPO 6.28 of the RSES with respect to the preparation of Local Transport Plans (LTP), the Planning Authority is advised to include an objective to vary the Cavan County Development Plan 2022-2028 (Development Plan) when the LTP for Cavan Town has been finalised, in order to ensure that the measures identified in the LTP align with the proposed residential sites in the proposed Variation.

5. Summary

The Office requests that the Planning Authority addresses the recommendations and observations set out above.

As part of this process, the Chief Executive's report to the elected members, prepared under section 58(11) of the Act should summarise the Office's recommendations and outline how it is proposed to address same.

Following adoption of the Variation, the Planning Authority is required to:

- provide the Office with a copy of the adopted Variation, together with any submissions received from the Minister, the relevant Regional Assembly, and the National Transport Authority during the plan preparation process, within **one week** of adoption;
- inform the Office, **as soon as practicable**, where it decides not to comply with a recommendation, including the reasons for this decision; and
- publish notice of the Variation within **one week** of adoption, confirming that the Development Plan as varied will be available for inspection (online and at a specified location) no later than **five weeks** after adoption.

The Office looks forward to continued constructive engagement with the Planning Authority. If further clarification or discussion would be helpful, the Office would be pleased to assist and can be contacted at plans@opr.ie.

Is mise le meas,

A handwritten signature in dark ink, appearing to read 'AM O'Connor'.

Anne Marie O'Connor

Deputy Regulator and Director of Planning Policy Implementation

Designated Public Official under the Regulation of Lobbying Act 2015
