



14 August 2020

Forward Planning Team,
Cavan County Council,
Johnston Centre,
Farnham Street,
Cavan Town,
H12 V3W4

Re: Issues Paper for the Cavan County Development Plan 2022 – 2028

A chara,

Thank you for your authority's work in preparing the *Cavan County Development Plan 2022-2028 Issues Paper*. The Office acknowledges and welcomes the publication of this paper and your authority's work more broadly in advancing the review of the Cavan County Development Plan (the plan).

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

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

The Office has set out some comments for your authority to consider in formulating the draft plan.

These comments are offered without prejudice to any statutory observations and recommendations as may be forthcoming from the Office at future stages of the plan making process, and do not affect the obligation on your planning authority to comply with the relevant legislative requirements.

Consultation strategies

The Office commends the planning authority for the strategies used to inform the public about the review of the plan which included, inter alia, public events, radio adverts and opportunities for one-to-one consultation.

In particular, the Office welcomes the use of social media and a video explaining the purpose of the plan and how to make a contribution. The Office would appreciate feedback on the effectiveness of the planning authority's consultation approach in due course.

Core Strategy & Settlement Strategy

The formulation of the Core Strategy in line with section 10 of the Act is the most significant element in developing the planning authority's draft plan.

The NPF and the RSES for the Northern and Western Regional Assembly area, in addition to relevant specific planning policy requirements (SPPRs) specified in Ministerial guidelines under section 28 of the Act, will be key determinants in making the Core Strategy for your functional area.

One of the National Strategic Outcomes of the NPF is 'compact growth' which, from an urban development perspective, means that *'...we will need to deliver a greater proportion of residential development within existing built-up areas of our cities, towns and villages and ensuring that, when it comes to choosing a home, there are viable attractive alternatives available to people'¹.*

National Policy Objective (NPO) 3c has a target to *'Deliver at least 30% of all new homes that are targeted in settlements other than the five Cities and their suburbs, within their existing built-up footprints'².*

The Office notes that the Issues Paper does not make reference to 'compact growth' or the need for the plan to deliver at least 30% of all new homes within the existing built-up footprints of the county's settlements. In this regard, the Office advises that the policies and objectives in the plan will need to make clear reference to these aspects of national planning policy.

1 Page 139 of the NPF
2 NPO 3c, page 159 of the NPF

As the planning authority will be aware, the NPF has a target population for County Cavan of 83,000-84,500 by 2026 and 86,000-88,000 by 2031. This represents a population increase for the county of 7,000 to 8,500 people to 2026 above its 2016 census figure of 76,000.

The overall population target for the county in the Core Strategy is required to be consistent with the NPF Implementation Roadmap, with the projected growth of settlements also required to be consistent with the policy objectives of the NPF and the RSES concerning the distribution of population growth.

In this regard, the Office advises that a significant proportion of the county's future population growth will need to be allocated to the Key Town of Cavan and larger settlements consistent with the RSES which also identifies Virginia as a location with *strategic development potential of a regional scale*³.

The Office can provide further practical advice and technical support in the working out of the Core Strategy parameters above and within our statutory remit as the planning authority may require.

Local Area Plans

The Office notes that section 19(1)(b)(ii) of the Act requires the preparation of a local area plan (LAP) for Cavan Town and that this will replace the Town and Environs Development Plan 2014-2020.

Given Cavan Town's designation as a Key Town and the need to address issues such as the lack of suitably zoned lands to support economic development⁴, the Office welcomes the planning authority's proposal to advance the LAP and merge into the process of preparing the new development plan.

Regional Policy Objective (RPO) 6.27 supports the collaborative preparation of a Local Transport Plan (LTP) for Cavan Town led by the planning authority in conjunction with the National Transport Authority (NTA) and other stakeholders, and for the LTP to inform the LAP. In this regard, the Office advises the planning authority to consult with the NTA regarding any updates or revisions required to the current transportation plan.

The Office advises the planning authority to limit the number of development plan objectives requiring the preparation of a LAP especially for the smaller towns / villages or where limited growth is anticipated. The Office can provide further advice to the planning authority on these matters if required.

3 Page 106 of the RSES

4 Section 3.8.4, page 101 of the RSES

Urban Regeneration

The NPF recognises that the regeneration and rejuvenation of cities, towns and villages of all types and scale can play a role in making stronger urban places and contributing to compact growth.

In this regard, the Office welcomes the following statement in the Issues Paper: *‘A strong focus for the new development plan will be to encourage growth and regeneration of our towns and villages.’*

One of the key future priorities listed in section 3.8.4 of the RSES is to *‘support the actions set out in the Cavan Town Revitalisation Plan including the prioritisation of projects having regard to Cavan being listed as an Urban Priority Region by the EPA’.*

Acknowledging that Key Towns including Cavan Town are targeted to have a 30% population uplift in the RSES, the development plan and LAP will need to prioritise the development of opportunity sites close to the town centre, such as the Abbeylands Cultural Quarter, in the first instance.

The NPF supports the use of performance based standards for infill / brownfield development stating⁵:

‘In particular, general restrictions on building height or universal standards for car parking or garden size may not be applicable in all circumstances in urban areas and should be replaced by performance-based criteria appropriate to general location, e.g. city/town centre, public transport hub, inner suburban, public transport corridor, outer suburban, town, village etc.’

In this regard, there is an opportunity to review the current development management standards in Chapter 10 of the plan, in particular the sections dealing with standards for residential and apartment development, to ensure they are consistent with the relevant and any updated section 28 guidelines.

Economic Development & Employment

The Office notes that the county’s economic base has expanded from a previous reliance on the agricultural sector and agri-related activities and now has a stronger presence in the industrial, enterprise and services sectors⁶.

The Office considers that the current high jobs ratios in Cavan Town and Cootehill place these settlements in a strong position to support sustainable growth, and reduce pressure for one off housing in their rural hinterlands.

⁵ Page 67 of the NPF

⁶ Page 12 of the Issues Paper

However, the Office also notes that most of the towns at tier 2 of the county settlement hierarchy have a ratio of jobs to resident workers significantly below 1.0 which indicates high levels of outbound commuting from these settlements.⁷

The Office considers that this will be significant issue to address in the forthcoming plan, in particular for Virginia, which the RSES identifies as a location with *strategic development potential of a regional scale*, and is proposed to be bypassed as part of further improvements to the national road network⁸.

The Office considers that the plan should be proactive in identifying sites or opportunities to support economic development and employment, consistent with national, regional and local policies, and in particular the principles in the section 28 guidelines on retail planning⁹ and national roads¹⁰.

Transport & Infrastructure

The Issues Paper recognises that a successful transport system is dependent on co-ordination and integration with land-use planning. The Office welcomes the following statement in the Issues Paper:

*'The development plan will set out to plan developments to use existing infrastructure and transport modes so that new housing and economic developments are in locations where these already exist.'*¹¹

In view of the greenhouse gas (GHG) emissions from transport (which are second only to agricultural emissions in terms of national emissions¹²) and the energy use for transport (highest energy use by sector, accounting for 43% total final consumption in 2017), it will be essential for the planning authority to achieve a significant modal shift in the county in order to meet the requirements under section 10(2)(n) of the Act. In view of same, the Office would encourage the planning authority to include modal shift targets to be achieved over the plan period, aligned to relevant implementation measures, in order to achieve meaningful improvements in GHG emissions and energy use in line with section 10(2)(n).

The NPF sets out a two-tier approach to land zoning referred to as the tiered approach to land zoning. In this regard, the planning authority's attention is drawn to the requirement in NPO 72a which states:

7 Page 176 of the NPF

8 Page 41 of the National Development Plan

9 Guidelines for Planning Authorities Retail Planning (Apr 2012)

10 Spatial Planning and National Roads Guidelines (Jan 2012)

11 Page 16 of the Issues Paper

12 EPA: www.epa.ie/ghg/currentsituation/

‘Planning authorities will be required to apply a standardised, tiered approach to differentiate between i) zoned land that is serviced and ii) zoned land that is serviceable within the life of the plan.’

Further information regarding the above is provided in Appendix 3 of the NPF: *A Methodology for a Tiered Approach to Land Zoning*.

In respect of the provision of wastewater and water infrastructure, there is a need to work proactively with Irish Water to progress projects that deliver infrastructure for the county’s settlements and support development in strategic development areas consistent with the NPF and RSES.

A key issue for the next development plan is to ensure that policies maximise the benefits of existing and planned public transport investment and that planned improvements to the national road network are not eroded by a growth in demand for car travel, especially for short distances, in the absence of long term public transport infrastructure.

In this regard, the plan should ensure that the route corridor options for the N3-Virginia bypass are protected and that local policies and development management standards regarding access to national roads including exceptional circumstances are consistent with the *Spatial Planning and National Road Guidelines* (2012).

Commitment to the proactive implementation of the Design Manual for Urban Roads and Streets (as revised) in the required locations, consistent with RPO 6.26, will also assist sustainable and active transport modes, in addition to improvement in the street environment and overall quality of life of urban areas and settlements of all sizes.

Rural Development

Recognising that ‘... *there remains an on-going demand for rural dwellings*’¹³, it is important that the next development plan provides the appropriate balance between policies supporting rural housing and those that proactively address issues of town / village decline and compact growth. In this regard, the plan’s policies will need to demonstrate consistency with NPO 19 and NPO 20¹⁴ and RPO 3.3 which seeks to ‘*deliver at least 20% of all new housing in rural areas on brownfield sites*’¹⁵.

Furthermore, the plan will need to consider the practical implementation of appropriate policy objectives through suitable land activation approaches and proactive facilitation of the building of

13 Page 8 of the Issues Paper

14 Page 74 of the NPF

15 Page 38 of the RSES

homes within the footprint of rural settlements through measures such as site acquisition and serviced sites consistent with NPO 18a and NPO 18b.

Such initiatives have the potential to alleviate pressure on the open countryside through provision of a desirable alternative to one-off housing for families who would like to reside close to the facilities, services and amenities available in rural villages and towns whilst maintaining ties to the wider rural community.

Strategic Flood Risk Assessment

The planning authority will be aware of the need to prepare a Strategic Flood Risk Assessment (SFRA) as part of the forthcoming draft development plan, consistent with *The Planning System and Flood Risk Management Guidelines for Planning Authorities*.

In this regard, the Office advises against the use of information from the Office of Public Work's Preliminary Flood Risk Assessment (PFRA) and arterial drainage benefitting land maps to inform the SFRA. The planning authority will need to undertake adequate flood risk assessment to determine if there is sufficient information to inform zoning decisions or if further more detailed analysis is required.

Climate Action and Energy

The planning authority will 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.

Having regard to the *Climate Action Plan 2019* and to the objectives of the NPF and the RSES, the transition to a low carbon economy and the overall reduction in carbon emissions will become a central issue for planning policies during the preparation of the plan.

The Office welcomes the following statement on page 9 of the Issues Paper:

'Climate change is a key consideration in the development of the Core Strategy and the strategic objectives of the plan.'

Regarding climate change mitigation measures pertinent to section 10(2)(n), section 6.2 – Transport and section 6.3 – Transport Investment Priorities (including RPOs 6.27, 6.28, 6.29, 6.30, 6.31 and 6.32) of the RSES are of relevance regarding the integration of land use and transport planning.

The promotion of renewable energy sources within the county in accordance with the section 28 *Wind Energy Development Guidelines* (2006), Circular Letter PL 5/2017: *Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change and Wind Energy*

Development Guidelines 2006 – Update on Review (July 2017) , or any replacement guidelines issued by the Minister, will also be critical to ensure Ireland meets its national targets and commitments to increase renewable energy supply and reduce greenhouse gas emissions.

In this regard, the attention of the planning authority is drawn, in particular, to the SPPR under the aforementioned interim guidelines. This requires, inter alia, that the planning authority indicate how the implementation of the relevant development plan or LAP over its effective period will contribute to realising overall national targets on renewable energy and climate change mitigation, and in particular wind energy production and the potential wind energy resource (in megawatts).

Summary

The Office commends your authority for the preparation of this Issues Paper and supporting consultation material, and for its strategies to engage with the community.

The Office advises your authority to pay particular attention to the following issues in the formulation of the county development plan:

- National and regional objectives for population growth, compact growth and regeneration in determining the Core Strategy, including the settlement hierarchy for your functional area. In this regard, the Office advises that a significant proportion of the county's future population growth should be directed to Cavan Town and other key settlements such as Virginia. This settlement hierarchy should also inform the quantum of land zoned for residential development in other settlements, and the allowance allocated to the rural remainder.
- The coordination of economic development and employment with population growth which capitalises on strengths such as the high jobs ratio in some of the county's larger towns and addresses challenges such as outbound commuting from towns in the east of the county.
- The need for the development plan to identify and zone suitable employment land in Cavan Town, Virginia and other tier 2 settlements to address demand for such land, and to counteract commuting outside the county for employment.
- The inclusion of specific policies and implementation measures to deliver infill / brownfield development in the county's towns and the building of homes within the footprint of rural settlements. These policies and implementation measures should be specific, targeted, and measurable (i.e. include monitoring measures).
- The development of rural housing policies that are consistent with NPOs 19 and 20 of the NPF, and which in turn support the regeneration of rural towns and villages by directing residential development to serviced areas and facilitating more sustainable transport patterns.
- The need for consultation with transport agencies including the NTA and Transport Infrastructure Ireland during the preparation of land use and transport plans and to ensure that policies and development management standards regarding access to national roads including

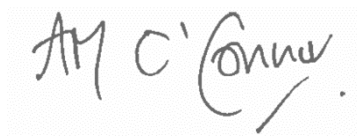
exceptional circumstances are consistent with the *Spatial Planning and National Road Guidelines* (2012).

- The promotion of sustainable settlement and transport strategies for urban and rural areas with measures to reduce GHG emissions, reduce energy usage and to adapt to climate change. The plan should include targets for modal shift over the plan period aligned to specific implementation and monitoring measures.
- The promotion of renewable energy sources within the county in accordance with the relevant section 28 guidelines.

The Office looks forward to reviewing the plan and is committed to continued positive engagement with your authority in the implementation of national and regional policies at county and local level.

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

Yours sincerely,

A handwritten signature in black ink that reads "AM O'Connor". The signature is written in a cursive, slightly slanted style.

Anne Marie O'Connor
Deputy Planning Regulator

087 689 4771

Annemarie.oconnor@opr.ie