

4th July 2023

Forward Planning Team,
Monaghan County Council,
Planning Offices,
1 Dublin Street,
Monaghan,
H18 X982

Re: Issues Paper for the Monaghan County Development Plan 2025 - 2031

A chara,

Thank you for your authority's work in preparing the *Monaghan County Development Plan 2025 – 2031 Issues Paper* (the Issues Paper). The Office of the Planning Regulator (the Office) acknowledges and welcomes the publication of the strategic Issues Paper and your authority's work more broadly in advancing the review of the Monaghan County Development Plan (the Development 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 *Project Ireland 2040: 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.

1. Consultation strategies

The Office commends the planning authority for the strategies used to inform the public about the review of the Development Plan which provided for public events, radio adverts and opportunities for one-to-one consultation.

There are many great innovative methods which can encourage further public participation on the development plan process. To assist local authorities, the OPR has produced a document entitled *Increasing Public Engagement in Local Authority Development Plans – A communications toolkit*¹. It draws on existing good practices already used by many local authorities. It also offers practical suggestions and refers to particular examples which have worked to good effect.

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

2. 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.

The NPF has a target population for County Monaghan of approximately 68,000 people by 2026 and 71,000 by 2031. This represents a population increase for the county of approximately 9,500 people to 2031 above its 2016 census figure of 61,500. The recent preliminary census results indicate that the population for County Monaghan has increased

¹ <https://www.opr.ie/wp-content/uploads/2020/05/Increasing-Public-Engagement-with-Local-Authority-Development-Plans-A-Communications-Toolkit.pdf>

from 61,386 (2016) to 64,832 (2022) representing a 5.6% increase in the last six years. This rate of population growth is generally on track to meet the county's 2026 NPF target.

The core strategy housing requirement to accommodate this level of population growth should then be calculated on the basis of the section 28 guidelines *Housing Supply Target Methodology for Development Planning* (2020).

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.

A key function of the core strategy is the determination of a settlement hierarchy and the level of growth for the towns and villages across the county over the plan-period consistent with the policy objectives of the NPF and the RSES.

The Issues Paper provides a series of five core strategy options identified as part of the Issues Paper which are described as pre-draft alternative core strategy options aimed at generating debate and discussion. The Office notes that the core strategy options outlined in the Issues Paper will evolve over the course the Development Plan as it progresses. In this regard, the Office advises that a significant proportion of the county's future population growth and housing supply target should be allocated to the Key Town of Monaghan and larger settlements consistent with the RSES, which anticipates a 30% population uplift for Monaghan Town and also identifies Carrickmacross as an area with strategic development potential of a regional scale².

The Office refers to the *Development Plans, Guidelines for Planning Authorities* (2022) (the Development Plans Guidelines) in relation to the distribution of population and housing targets to the various settlements in the settlement hierarchy, including rural areas, and reminds the planning authority of the need for an evidence-based approach. In this regard, a comprehensive Settlement Capacity Audit (SCA) of the land and sites with potential for delivering sustainable future development at a settlement level over the plan-period will be required to inform the drafting of the settlement/core strategy.

The SCA requires an infrastructural assessment of lands within, and adjacent to, settlements as a key research element to inform the settlement strategy. The purpose of the SCA is to ensure that proposals to facilitate housing development through land use zoning

² Page 139 of the RSES

should be based upon a sound evidence base that demonstrates services are / will be available within the lifetime of the plan in order to facilitate development.

The Office also draws the planning authority's attention to the requirement to carry out an Infrastructure Assessment in accordance with NPO 72 and *Appendix 3*³ of the NPF which sets out a two-tier approach to land zoning referred to as the tiered approach to land zoning. This requires planning authorities to distinguish between lands that are serviced (Tier 1) and those that are serviceable (Tier 2).

The Office advises the planning authority to liaise closely and collaborate with the relevant prescribed authorities concerning the delivery of essential services and infrastructure.

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'*⁴.

National Policy Objective (NPO) 3c has set 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'*⁵.

The local authority is reminded of the critical role of compact growth in the promotion of sustainable settlement and transportation strategies in urban and rural areas⁶ and should seek to further refine and identify mechanisms through which the Development Plan will seek to deliver on NPO 3c and RPO 3.1 in respect of delivering significant compact growth within the Key Town of Monaghan.

The Issues Paper correctly identifies the need to prepare a housing needs and demand assessment (HNDA) and it is noted that the planning authority is preparing a HNDA to inform the housing strategy and housing policies for the Development Plan.

Finally, the core strategy must also present data on employment and enterprise zonings, this evaluation should include data on the rate of take-up of existing employment zonings in

³ Appendix 3 of the NPF: *A Methodology for a Tiered Approach to Land Zoning*

⁴ Page 139 of the NPF

⁵ NPO 3c, page 159 of the

⁶ Section 10 (2)(n) of the Planning and Development Act 2000 (as amended)

the core strategy. Matters relating to economic development and employment are addressed further below.

3. 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 Monaghan Town and Carrickmacross given their population and designation within the RSES. The Office notes that there are no existing LAPs for these settlements but rather, detailed settlement plans are contained with the existing Monaghan County Development Plan 2019 – 2025.

While the Office generally supports this approach, the Development Plan should clearly set out its intentions regarding the preparation of LAPs for Monaghan Town and Carrickmacross. In this regard, the planning authority should ensure it fulfils its obligations under section 19(1)(b)(ii) of the Act in relation to the preparation of LAPs.

The Office advises the planning authority to limit the number of development plan objectives requiring the preparation of LAPs, 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.

4. 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.

The Office commends the planning authority for its recent initiatives under the *Urban Regeneration and Development Fund* (URDF) scheme, including the *Dublin Street North Regeneration Plan* and the *Roosky Lands Master Plan* in Monaghan Town through the provision of various infrastructure measures. While these initiatives demonstrate the planning authority's commitment to delivering town and village regeneration, the emphasis on prioritising urban-led development and the regeneration of brownfield sites in order to promote compact growth as advocated by the NPF and RSES could have been more strongly articulated in the Issue Paper as being a key objective of the forthcoming Development Plan.

The RSES sets out a number of key future priorities for the Key Town of Monaghan which seeks to deliver 20% of its projected future growth through regeneration and renewal of a significant area of the town centre. The RSES also recognises that 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 which may also provide opportunities for redevelopment.

As part of the measures to advance brownfield development, the Office notes that the government intends to legislate for enhanced powers of compulsory purchase of privately owned sites to ensure the necessary physical restructuring and transformation of places in need of regeneration. It is expected that local authorities will purchase vacant properties through their compulsory purchase powers and should also utilise the existing *Buy and Renew Scheme* and *Repair and Leasing Scheme* to maximise opportunities to return vacant properties to productive use. The Department of Housing, Local Government and Heritage is providing additional funding to local authorities to support vacant homes officers within local authorities.

Acknowledging that Key Towns such as Monaghan are targeted to have a 30% population uplift in the RSES, the Development Plan will need to prioritise the development of opportunity sites which are proximate to the town centre and which will assist in supporting compact growth, settlement consolidation and the identification of regeneration areas. The NPF supports the use of performance-based standards for infill/brownfield development stating⁷:

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.

The planning authority should also be mindful of the policy approach in relation to density and development management standards in respect of residential development and should have regard to the section 28 guidelines in respect of residential densities; *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas: Cities, Towns and Villages* (2009), and *Circular Letter: NRUP 02/2021* in respect of residential densities in towns and villages⁸. The Office also advises the planning authority of the emerging policy approach in relation to density and development standards for housing, and recent

⁷ Page 67 of the NPF

⁸ <https://www.opr.ie/wp-content/uploads/2021/04/21-04-21-NRUP-02-2021-Circular-Application-of-Residential-Densities-in-Towns-and-Villages.pdf>

consultation paper *Sustainable and Compact Settlements Guidelines for Planning Authorities - Proposed Policy Approach* (2023)⁹.

The planning authority should also seek to ensure that any new development reflects the compact growth and *Town Centre First: A Policy Approach for Irish Towns* (2022) (Town Centre First) agenda which is critical to addressing climate change via a reduction of private transport modes, extent of green-field land consumption, and ineffective provision of infrastructure.

5. 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 sectors. The Office notes that County Monaghan also occupies a strategic border location along the Dublin to Letterkenny/Derry City corridor, and adjacent to the Dublin/Belfast eastern economic corridor.

County Monaghan has developed a strong employment-base hosting a mix of established domestic and international companies as well as a prevalent agri-food and agricultural sector which facilitates around 60% of the county's total employment profile. The current high jobs ratios in Monaghan Town, Carrickmacross and Castleblaney place these settlements in a strong position to support sustainable growth and to reduce pressure for one off housing in their rural hinterlands.

The NPF recognises that addressing the economic resilience and connectivity will be a strategic priority for this area. The maintenance of seamless cross-border movement for people, goods and services, together with improvements in digital and physical infrastructure will create new opportunities to strengthen the local employment base and for sustainable population growth focused on county towns.

The Office notes that the RSES sets out a number of key future priorities in relation to economic development for Monaghan Town including the lands to the north east of the town which could be connected to the national road network. The RSES recognises that the employment lands to the north east should be integrated with population growth and are of strategic importance for the future employment of the town. Section 3.8 of the RSES also provides a strategy which seeks to anticipate and plan for jobs and economic development

⁹ <https://www.gov.ie/en/publication/64207-sustainable-and-compact-settlements-guidelines-for-planning-authorities/>

of regional scale including Key Towns, such as Monaghan, which exhibit specific characteristics where strategic development potential of a regional scale exist.

The Office encourages the planning authority to be proactive in identifying sites or opportunities to support economic development and employment particularly urban-led and brownfield regeneration sites, consistent with national, regional and local policies, and in particular the principles in the section 28 guidelines on retail planning¹⁰ and national roads¹¹.

In relation to the future zoning of employment lands, ensuring that the economic strategy of the Development Plan is translated into the appropriate land-use zoning proposals is an important consideration in the plan making process. The evidence base and rationale underpinning the zoning of employment uses should be clear and strategic in nature and seek to cater for the sustainable delivery and provision of employment led uses as well as supporting a live-work community. In this regard, the Development Plan should be grounded upon an up-to-date evidence base that relies on sound datasets in order to provide an accurate and reliable spatial analysis of employment typologies, their location, concentration and future growth areas.

The Office encourages the planning authority to provide information on the existing quantum and capacity of employment lands, both developed and undeveloped as well as servicing information in order to fully understand future capacity requirements and where shortfalls/oversupplies in provision may exist. It is noted that significant parcels of land are currently zoned for Industry/Enterprise/Employment to the north-east of Monaghan Town and Carrickmacross a lot of which appears undeveloped.

In this regard, the Development Plan must include a methodology and justification in circumstances where new employment lands are proposed and/or retained from previous development plans. The local authority may formulate a methodology that suits its own enterprise/employment profile and local characteristics however the approach should be logical and evidence-based particularly in relation to the quantum of lands proposed for zoning and should generally follow the approach outlined in Appendix A, section 1.4 of the Development Plans Guidelines.

¹⁰ Retail Planning Guidelines for Planning Authorities (2012)

¹¹ Spatial Planning and National Roads Guidelines for Planning Authorities (2012)

The local authority should also ensure that Enterprise and Employment zoning objectives (including the zoning matrix) avoid conflicting uses that could give rise to competing operational and environmental requirements.

The local authority should be mindful of the sequential approach to zoning in regards to site servicing, access arrangements, proximity to public transport and settlement consolidation. Furthermore, accessibility is a central component in identifying employment zonings and the transport provision of potential locations for new development should be considered strategically. For example, low intensity employment uses such as distribution and logistics centres will require convenient access to the strategic road network. Similarly, high intensity employment uses such as offices will require the highest level of accessibility by public transport and sustainable transport modes such as walking and cycling.

6. Transport & Infrastructure

The Issues Paper recognises the importance of a multi-modal transport network system in contributing to Monaghan's business and industrial competitiveness. In this regard, the Office welcomes the commitment to promoting sustainable development in the Issues Paper:

The Development Plan will seek to develop, improve, protect, and enhance, the range and accessibility of infrastructural services in a manner that promotes sustainable development in the County.

The Office notes that there are several routes within and proximate to County Monaghan which facilitate strategic connections to larger urban areas, and provide particular linkages for cross border movement to Northern Ireland which carry significant volumes of traffic. These include but are not limited to: the Dublin – Belfast corridor (M1/A1); North Western Route (N2/A5); Central Radial Route (N3/M3/A509); and, East West Link Road (Dundalk/Sligo route).

The Office welcomes the progression of key infrastructural projects which are understood to be at planning and design stage, including the N2 Clontribret to border which will see the upgrading of the route seeking to remove through traffic from Emyvale and improvements to noise and air quality. The Office also notes that a preferred route has been identified for the N2 Ardee to Castleblaney project which will provide significant upgrades to the route to enhance safety, and reduce direct access points and turning movements, as well as the provision of new cycling and walking infrastructure. In this regard, the Office encourages the planning authority to consult with Transport Infrastructure Ireland (TII) and recognise and

support the future delivery and implementation of these projects through appropriate development plan objectives.

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 38% total final consumption in 2021, 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 light of this, the Office encourages the planning authority to work with the National Transport Authority (NTA) to inform modal share targets to be achieved over the plan-period in order to ensure meaningful reductions in GHG emissions and energy use in line with section 10(2)(n). The Office advises the planning authority to include specific modal share targets for Monaghan Town and potential aggregate targets for lower tier settlements. The Laois County Development Plan 2021 – 2027 provides a good practice example of how to integrate baseline modal share information and targets into the Plan¹³.

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 relation to the national road network, the planning authority should ensure that any emerging policies in the Development Plan are consistent with RPO 6.5 regarding the capacity and safety of the region's land transport networks and the *Spatial Planning and National Road Guidelines for Planning Authorities* (2012).

Commitment to the proactive implementation of the *Design Manual for Urban Roads and Streets* (revised 2019) 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.

In respect of the provision of wastewater and water infrastructure, there is a need to work proactively with Uisce Éireann to progress projects that deliver infrastructure for the county's settlements and support development in strategic development areas consistent with the NPF and RSES. The provision of waste infrastructure is a necessary component for the future development of the region and can be of equal importance to other infrastructure in

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

¹³ Section 3.4 - *Integrating Climate Change into the plan* and table 14.1 (Chapter 14)

securing economic development. The Office encourages the planning authority to have regard to RPOs 8.8 - 8.11 in relation to wastewater infrastructure and RPOs 8.12 – 8.23 in relation to water services infrastructure.

7. Rural Development

It is important that the next development plan considers the 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 of the RSES which seek to deliver at least 20% of all new housing in rural areas on brownfield sites¹⁵.

The Office commends the planning authority's recent progress with urban-led regeneration projects in smaller settlements such as the Clones Renewal Scheme providing for 24 new residential units within the town centre on brownfield and derelict sites and the completion of an unfinished multi-use development along the Main Street in Ballybay.

That being said, the Office notes the predominantly rural nature of the county with over 68%¹⁶ of residential constructions being single dwellings, which is significantly above the national average of around 40% in the last plan-period. In contrast, urban areas such as Monaghan Town have had relatively low new dwelling completions in recent years¹⁷. Furthermore, there was a significantly high proportion of rural one-off dwellings (551) approved over the last plan-period. The continuation of this trend has the potential to divert unsustainable levels of housing to small rural settlements, which may lack the necessary infrastructure such as wastewater treatment. Furthermore, the continuation of a car-dependant pattern of development is contrary to the mandatory requirements for sustainable settlement and transportation strategies to reduce energy demand objectives under section 10(2)(n) of the Act.

This high proportion of rural generated development will, therefore, be a critical issue for the Development Plan to address. In this regard, the Development Plan must give consideration to how best it can prioritise the regeneration and rejuvenation of rural villages and towns

¹⁴ Page 74 of the NPF

¹⁵ Page 46 of the RSES

¹⁶ Central Statistics Office (CSO) database

¹⁷ Figure 19 Regional Spatial and Economic Strategy – Two year monitoring report 2020-2022

and seek to develop a clear rural strategy that provides a detailed spatial analysis of development patterns, including rural housing trends.

The Office encourages the planning authority to revisit the existing rural housing strategy including the settlement typology map, and explore the implementation of a specific land-use zoning objective for the rural area particularly for areas under significant pressure from rural housing. An assessment of the spatial distribution of rural housing trends to identify development patterns and assess the implementation of rural housing policies would also usefully inform rural housing policy in the Development Plan¹⁸. In addition, the planning authority should also be cognisant of rural housing demand extending across administrative boundaries therefore an understanding of these cross boundary functional urban areas is also required.

Furthermore, the Development Plan will need to consider the practical implementation of appropriate policy objectives through suitable land activation approaches and proactive facilitation of the building of homes within the footprint of rural settlements through measures such as site acquisition and serviced sites consistent with NPO 18a and NPO 18b. These measures have the potential to alleviate pressure on the open countryside through the provision of a desirable alternative to one-off housing for those who would like to reside close to the facilities, services and amenities available in rural villages and towns while maintaining ties to the wider rural community.

Funding support has been made available under the *Ready to Build Scheme* whereby local authorities will make serviced sites in towns and villages available to potential purchasers. The Office encourages the planning authority to develop existing sites in their control or purchase sites and make them available for development by providing the necessary services and access arrangements.

The Office also encourages the planning authority to be proactive in providing an alternative to housing in the open countryside through the provision of serviced sites in villages and lower tier settlements. The serviced sites schemes in Ballyroan and Durrow in County Laois supported under the *Croí Cónaithe (Towns) Fund Scheme* provide good examples of an approach which has strong policy support in the Laois County Development Plan 2021-2027.

¹⁸ Kildare County Councils Rural Housing Study provided a spatial analysis of rural housing trends to inform the Kildare County Development Plan 2017-2023.

8. 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* (2009).

The planning authority should ensure that it has regard to the detailed requirements and provisions of these guidelines, including the staged approach to flood risk assessment and, in particular, the application of the sequential approach and the requirement to carry out the plan-making justification test.

In this regard, the Office particularly 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 as this information is not appropriate for this purpose.

The Office also requests that the flood risk zones are overlaid on the land use zoning maps in the draft Plan and that a copy of digital mapping data is made available to the Office and to the OPW to facilitate assessment.

The planning authority is strongly advised to liaise with the OPW in relation to the preparation of the SFRA to avoid issues arising at draft plan stage.

9. Climate Action and Energy

The preparation of the Development Plan provides an opportunity for the local authority to demonstrate leadership on climate action and set out local roadmaps to deliver on national emissions reduction targets. 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.

In this regard, the forthcoming Development Plan process should play a significant role in reducing the county's carbon footprint, through the creation of less energy and travel-intensive patterns of development, facilitation of energy generation from low carbon sources, and the adaptation of communities to the effects of climate change.

Having regard to the *Climate Action Plan 2023* (Climate Action Plan) and to the objectives of the NPF and the RSES, the transition to a low carbon economy, the overall reduction in carbon emissions will become a central issue for planning policies during the preparation of the Development Plan.

Regarding climate change mitigation measures pertinent to section 10(2)(n) of the Act, 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 planning authority should also have regard to RPOs 6.33 and 6.34 in relation to Electric Vehicles.

The Office welcomes the recognition of the need for mitigation and adaptation measures on page 6 of the Issues Paper:

Climate change is recognised as the significant challenge of our time, and will do so into the future. Responding to this challenge requires a dual approach of both mitigation (tackling the cause) and adaptation measures reducing the impacts and building adaptive capacity and resilience.

Notwithstanding, the Office notes that renewable energy generation in County Monaghan is comparatively low. As such, the Regional Development Monitor indicates that the county has three connected¹⁹ and two planned²⁰ wind farm developments and no solar farms²¹.

Under Policy EP2 in the existing development plan the planning authority committed to the preparation of a *Renewable Energy Strategy* (RES) which seeks to support the development of renewable energy infrastructure for the county. In this regard, the Office notes that a RES was not adopted as a variation to the existing Development Plan. The preparation of a RES as part of the draft Plan will therefore be critical to ensure County Monaghan contributes to national targets and commitments to increase renewable energy supply and reduce GHG. The forthcoming update to the *Local Authority Renewable Energy Strategy* Methodology prepared by SEAI, together with the section 28 *Wind Energy Development Guidelines* (2006) should provide guidance in this respect.

The Minister for Environment, Climate and Communications has recently launched *Local Authority Climate Action Plan Guidelines* (CAP Guidelines)²² which set out detailed guidance for local authorities in preparing local authority CAPs and to ensure that a coherent and consistent approach is implemented under the *Climate Action and Low Carbon Development (amendment) Act 2021* (Climate Act 2021). The CAP Guidelines require local authorities to exercise a strong link between spatial planning and positive

¹⁹ Maximum output capacity of 26.2 MW as of 17/2/23

²⁰ Maximum output capacity of 81.9 MW as of 17/2/23

²¹ <https://rdm.geohive.ie/>

²² *Local Authority: Climate Action Plan Guidelines*

climate action to ensure that land-use planning and development integrates considerations of adaptation and mitigation.

The Office welcomes the pre-draft consultation in relation to the five-year *Local Authority Climate Action Plan* (LACAP) which is currently open for public consultation until 14th July 2023. The LACAP will further enhance Monaghan County Council's ability to lead, engage and coordinate the response to the ongoing climate crises and also provides an opportunity to implement climate mitigation in the emerging development plan. It is understood that the anticipated timeline for the adoption of the LACAP is February 2024.

Research has shown that development plans that tackle the climate crises are those that clearly, succinctly and effectively document the local aspects of climate action facing that particular local authority area. In this regard, critical elements of the LACAP will be a robust supporting evidence including a Climate Change Risk Assessment, baseline evidence for emissions and emissions inventory for Monaghan Town which is the dedicated Decarbonization Zone for the county.

In light of this, the Office strongly encourages the planning authority to align their climate change policy objectives and associated policy basis in the draft Development Plan with the emerging LACAP. Further to this, the Development Plan should outline the local roadmaps that help to achieve the national targets setting out specific contributions that the implementation of specific planning policies can make such as reducing energy demands, alternative sources of renewable energy, sustainable infrastructure provision and promotion of sustainable transport modes. This will be critical to ensure that climate action is at the core of the Development Plan and recognises the role and responsibility the Development Plan has in setting out the targets, ambitions and objectives, particularly at a local level, to assist in the broader national aspirations.

The Office encourages the planning authority to refer to the recently published case study paper: *Climate Action and the Local Authority Development Plan* (2022)²³ which sets out practical comparative information that local authorities can learn from and use in incorporating evidence based and realistic climate mitigation measures into their development plans.

²³ <https://publications.opr.ie/view-file/89>

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 Development Plan:

- a significant proportion of the county's future housing and population growth should be allocated to the Key Town of Monaghan and larger settlements consistent with the RSES;
- the planning authority should refer to the Development Plans Guidelines in relation to the distribution of future population and housing targets to the various settlements in the settlement hierarchy, including rural areas which will require an evidence based assessment;
- Key Towns such as Monaghan are targeted to have a 30% population uplift in the RSES therefore prioritisation of opportunity sites proximate to the town centre is encouraged in order to support compact growth, settlement consolidation and the identification of regeneration areas;
- the approach to residential zoning in towns and villages should be consistent with the core strategy of the plan itself, and with national and regional policy on compact growth, the sequential approach to development, and infrastructure capacity;
- an infrastructure capacity assessment should be carried out for all zoned land including enterprise and employment uses;
- the planning authority should ensure it fulfils its obligations under section 19(1)(b)(ii) of the Act in relation to the preparation of LAPs, as relevant;
- zoning for enterprise and employment uses should reflect the economic strategy of the Development Plan and should be grounded upon an up-to-date evidence base that relies on sound datasets and a reliable spatial analysis of different employment typologies, their location, concentration and future growth areas;
- the Development Plan should ensure that policies maximise the benefits of existing and planned public transport investment as well as indicate how modal share targets are to be achieved over the plan-period;

- an evidence-based approach should be followed in the development of rural housing policies and maps to ensure consistency with NPO 19 and support the regeneration and rejuvenation of rural villages and towns;
- the planning authority should have regard to the Climate Action Plan and to the objectives of the NPF and the RSES, the transition to a low carbon economy and the overall reduction in carbon emissions which will become a central issue for planning policies during the preparation of the Development Plan;and
- the preparation of a Renewable Energy Strategy and the development of a policy framework to support renewable energy particularly solar and wind energy will be critical to ensure that County Monaghan assists in achieving national targets and commitments to renewable energy sources and the reduction of GHG emissions which should also align with the emerging LACAP.

The Office looks forward to reviewing the Development Plan as it progresses 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 style with a diagonal slash at the end.

Anne Marie O'Connor
Deputy Regulator and Director of Plans Evaluations
