



Oifig an
Rialaitheora Pleanála
Office of the
Planning Regulator

11th June 2026

The Forward Planning Unit,
Planning Department,
1 Dublin Street,
Monaghan Town,
H18 X982.

**Re: Proposed Variation No. 2 to the Monaghan County Development Plan 2025-
2031**

A chara,

Thank you for your authority's work in preparing the Proposed Variation No. 2 (proposed Variation) to the Monaghan County Development Plan 2025-2031 (Development Plan).

As Monaghan 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 includes a change to the Development Plan with regard to the implementation of the housing growth requirements, preparing and implementing a masterplan for the lands adjoining the indicative new road in Clones as well as additional policy in relation to Tier 4 Settlements. The proposed Variation includes a number of changes to the following elements:

- core strategy;
- policy amendments; and
- zoning amendments.

The Office welcomes the review of the adequacy of existing zoned lands to meet the housing growth requirements, including the 50% additional provision, set out in the NPF Implementation: Housing Growth Requirements (2025). The Office notes the revision of the core strategy which seeks to provide lands sufficient to accommodate the housing target of 5,895 units which is based on the National Planning Framework First Revision (2025) (NPF) target plus the additional provision of 50%.

The Office particularly welcomes that a Settlement Capacity Audit and Infrastructure Assessment has been carried out in relation to the proposed zoning amendments. The Office commends the Planning Authority's release of a number of Strategic Residential Reserve sites within Monaghan Town, Carrickmacross, Castleblayney, Clones and Ballybay and that the Planning Authority has proactively sought to identify lands which will realistically come forward for development.

The Office, however, does make a number of recommendations in relation to the promotion of Tier 4 Settlements, compact growth, flood risk management and transportation for the Planning Authority to address.

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

Subject	Recommendation	Observation
Tier 4 Settlements	Recommendation 1	-
Residential zoning in Castleblayney	Recommendation 2	-
Flood risk management	Recommendation 3	-
Monaghan Local Transport Plan	Recommendation 4	-
National roads	Recommendation 5	-

2. Tier 4 Settlements

Section 15.8.10 of the Development Plan states that residential development in Tier 4 Settlements with capacity in existing public foul drainage and public/group water systems will be considered, subject to compliance with specified criteria. Section 15.8.10 criterion (b) requires development to contribute to the sequential development of land from the centre of the settlement outwards and/or represents an infilling of the existing settlement envelope.

The Development Plan does however allow for an exception whereby social housing developments may be considered outside the defined settlement limit, where a clear need is demonstrated and the lands are contiguous and can be adequately serviced. This approach was appropriately justified with reference to relevant housing policy and social need.

Proposed Amendment No. 16 however seeks to remove the restriction limiting this exception to social housing, thereby allowing all forms of residential development to be favourably considered outside settlement limits until such time as village plans are adopted.

Given that the tendering process has only been completed for three of the 14 villages, and that Development Plans are to be prepared at a rate of three per year, there is a clear risk of piecemeal and uncoordinated development occurring outside settlement boundaries over an extended period. This would undermine the plan-led approach to development and conflict with Housing Strategic Objective HSSO 1, to

plan for future housing in the county within defined settlements, enabling the plan-led growth of villages.

No rationale is provided for the ability to set aside section 15.8.10 criterion (b), to support the sequential development of land from the centre of the settlement outwards and/or infill within the existing settlement envelope, which aligns with the key priorities for compact growth in villages set out in the Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities (2024), to strengthen the existing urban core, realise opportunities for infill and backland development and to provide for sequential and sustainable housing development. Facilitating development outside settlement limits would run counter to these principles.

Furthermore, no assessment has been provided to demonstrate that sufficient land is unavailable within existing settlement boundaries to accommodate the population and housing growth targets set out in the Core Strategy. In the absence of such evidence, the proposed policy change is not considered to be justified.

The Office is also concerned that the approach could lead to inconsistency and uncertainty in the application of planning policy. For example, a situation may arise where a single rural dwelling outside the settlement boundary is restricted by rural housing policies, while a multi-unit residential scheme in a similar location would not be subject to the same planning criteria and considerations. This would create incoherence in the policy framework.

It is therefore recommended that the Planning Authority adopt an evidence-based and plan-led approach to determining whether and where settlement limits should be extended, rather than the proposed approach, which would significantly weaken the current strategy for supporting sustainable development in rural communities.

Recommendation 1 - Tier 4 Settlements

Having regard to the sustainable and plan-led growth villages in the county, and having considered:

- NPO 20 of the NPF the presumption in favour of development that can encourage more people and generate more jobs and activity within existing settlements;
- NPO 43 of the NPF to prioritise the provision of new homes at locations that can support sustainable development;
- the NPF Implementation: Housing Growth Requirements (2025);
- Housing Strategic Objective HSSO 1 of the Monaghan County Development Plan 2025-2031;
- the policy and objective for a sequential approach to development under the Development Plans, Guidelines for Planning Authorities (2022); and
- Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities (2024),

the Planning Authority is recommended to retain the stipulation that it is only social housing development proposals located outside the settlement envelope that may be given favourable consideration by the Planning Authority.

3. Residential zoning in Castleblayney

Carefully managing the sustainable growth of the towns and villages within County Monaghan will add value and create more attractive places in which its people can live and work. Such settlements contain many centrally located potential development areas that are suitable to provide housing. Activating such areas, achieving effective density and consolidation, rather than more sprawl of urban development, is a top priority of the NPF and the Regional Spatial and Economic Strategy (RSES) for the Northern and Western Regional Assembly (NWRA). It also ensures that land is developed in a sequential and co-ordinated matter. Securing such compact and sustainable growth supports the efficient provision of

infrastructure and services, encourages the use of public transport, walking and cycling as well as reduces energy demand and usage.

Although it is appreciated that the Planning Authority has sought to identify lands that are likely to come forward for development, within Castleblayney one of the new rural area sites (CY1012) is located on the periphery of settlement and, as acknowledged by the Settlement Capacity Audit, will not result in compact growth. The site is located within an area where the predominant development is detached residential dwellings set within individual plots. The anticipated residential yield of site CY1012 is 32 units. The site is not served by public footpath or lighting and it is not stated if foul sewerage drainage, water supply and surface water drainage is available.

Consequently, the proposed land would not support the delivery of compact and sequential growth and does not prioritise the provision of new homes at locations that can support sustainable development.

It is therefore recommended that site CY1012 is removed from the proposed Variation.

Recommendation 2 - Compact growth

Having regard to the delivery of compact and sequential growth, and the provision of new homes at locations that can support sustainable development, and having considered:

- NPO 9 of the NPF to deliver at least 30% of all new homes in settlements within their existing built-up footprints and ensure compact and sequential patterns of growth;
- NPO 43 of the NPF to prioritise the provision of new homes at locations that can support sustainable development;
- the NPF Implementation: Housing Growth Requirements (2025); and
- the policy and objective for a sequential approach to development under the Development Plans, Guidelines for Planning Authorities (2022),

it is recommended that the Planning Authority omit site CY1012 from the proposed Variation No. 2 to the Monaghan County Development Plan 2025-2031.

4. Flood risk management

The Office welcomes the preparation of a Strategic Flood Risk Assessment (SFRA) which has been carried out in accordance with National Policy Objective (NPO) 1 of the NPF and The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) (Flood Guidelines).

The Office acknowledges that the Planning Authority has sought to implement and embed the Flood Guidelines into the proposed Variation. The Office notes that site MT948 within Monaghan Town has been proposed as Proposed Residential A. The SFRA however states that the headwaters of an unmodelled watercourse run along a portion of the southern site boundary and that the Planning Authority has a record of an area of flooding within the site. From discussions with the Office of Public Works (OPW), the land is also within the benefiting lands of an Arterial Drainage Scheme. The OPW has also identified that site MT388 within Monaghan Town, which is proposed to be zoned as Proposed Residential A, is also within the benefiting lands of an Arterial Drainage Scheme channel. Consequently, these lands may be prone to flooding.

As per the Flood Guidelines, lands that are at risk of flooding should be avoided and should not be zoned for highly vulnerable residential development. The Planning Authority should therefore undertake a risk assessment in order to establish whether a Stage 3 detailed flood risk assessment is required to be carried out (as set out in section 2.21 of the Flood Guidelines) for sites MT388 and MT948, and if necessary amend or omit the land use zonings to water compatible uses only where it is found that highly vulnerable development is proposed within Flood Zone A/B or less vulnerable development in Flood Zone A and the Plan Making Justification Test has not been passed.

It also needs to be ensured that access is preserved for the maintenance of the Arterial Drainage Schemes; this is reflected within the Development Plan's Climate Adaption Measures in order to avoid flood risk.

Recommendation 3 - Flood Risk Management

Having regard to and having considered:

- NPO 78 of the NPF (in relation to flood risk management);
- RPO 3.10 of the RSES to integrate sustainable water management solutions and assess flood risk by implementing The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) (Flood Guidelines); and
- the Flood Guidelines,

the Office recommends that the Planning Authority:

- (i) determines if a Stage 3 flood risk assessment is required for site MT948 due to the presence of an unmapped watercourse which has no flood risk extent illustrated on the flood zone mapping and has a record of flooding as well as for site MT388 which is within benefiting lands of an Arterial Drainage Scheme. If required, the Planning Authority should undertake Stage 3 assessments and if necessary, re-zone the lands for an appropriate use consistent with the Flood Guidelines; and
- (ii) where zoning objectives are justified, the zoning objectives should specify that access is required for the maintenance of the Arterial Drainage Schemes.

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, where the Plan Making Justification Test has not been passed.

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

5. Monaghan Local Transport Plan

As stated in the RSES for the NWRA, there is a need to significantly improve the integration of land-use and transport planning in order to deliver on the commitment to have compact growth. This will enhance the connectivity of people and places by

promoting sustainable transport options for people of all age groups and levels of mobility. RPO 6.27 of the RSES emphasises the support for such integration including for Monaghan Town. RPO 6.28 of the RSES goes on to state that policies, objectives and measures which emerge from the Local Transport Plan (LTP) shall be incorporated in the Development Plan. Objective MTO 10 in the Development Plan indicates that the Development Plan will be varied to incorporate the objectives and measures of the finalised LTP for Monaghan Town.

Given that the Monaghan Town draft LTP was published in September 2025, the Office recommends that the Planning Authority clearly reflect its recommended strategy in the Development Plan.

Recommendation 4 - Local Transport Plan

Having regard to the need for the integration of land use and sustainable transportation, and having considered:

- NPO 37 of the NPF (sustainable mobility);
- RPO 6.27 of the RSES (integration of land use and transport);
- RPO 6.28 of the RSES (incorporation of local transport plans into development plans);
- the Climate Action Plan 2025 (reducing vehicle kilometres travelled);
- the Climate Action and Low Carbon Development Act 2015, as amended (mandatory target to reduce greenhouse gas emissions by 51%); and
- the National Sustainable Mobility Policy (2022) (reducing vehicle kilometres travelled),

the Planning Authority is recommended to incorporate the key policies, objectives and measures identified in the Monaghan Town Local Transport Plan into the Monaghan County Development Plan 2025-2031.

6. National roads

NPO 107 of the NPF seeks to ensure the alignment of the NPF and the National Development Plan through the delivery of the National Strategic Outcomes (NSO)

which includes NSO 2 of the NPF to enhance regional accessibility. This is further supported by RPO 6.5 of the RSES which stresses the importance of maintaining the strategic capacity and safety of the national roads network. Section 2.5 of Spatial Planning and National Roads Guidelines for Planning Authorities (2012) states that the policy of the planning authority will be to avoid the creation of any additional access point from new development or the generation of increased traffic from existing accesses to national roads to which speed limits greater than 60 kmph apply. National Roads Policy NRP 4 within the Development Plan states that the Planning Authority will adopt this approach.

The proposed Variation seeks to rezone a landscape protection/conservation zoning for Industry/Enterprise/Employment purposes in Clones (site CS1011). The land in question adjoins the N54 which is a national road at a location where Transport Infrastructure Ireland records indicate that an 80 kmph speed limit applies. Exceptional circumstances have not been presented by the Planning Authority in order for a less restrictive approach to apply. The rezoning may therefore undermine the strategic function of the national road network, thus compromise the carrying capacity, operational efficiency and safety of the national road.

The Office therefore recommends that the Planning Authority reviews site CS1011 to ensure that it adheres with the identified policy framework. If it is the Planning Authority's intention that an alternative form of access be provided, this should be clearly stated.

Recommendation 5 - National Roads

Having regard to the need to maintain the strategic carrying capacity and safety of the national road network and having considered:

- NPO 107 of the NPF to support the delivery of National Strategic Outcomes;
- NSO 2 of the NPF Enhanced Regional Accessibility;
- RPO 6.5 of the RSES to maintain and enhance the strategic function of the national road network; and

- the Spatial Planning and National Roads Guidelines for Planning Authorities (2012),

it is recommended that the Planning Authority review the access arrangements associated with site CS1011 to ensure that any future development will not be accessed from a national road to which speed limits greater than 60 kmph apply. If access cannot be provided in accordance with the above policy framework, the zoning objective should be omitted.

The Planning Authority should consult with Transport Infrastructure Ireland in relation to this recommendation.

7. Summary

The Office requests that the Planning Authority addresses the recommendations 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 them.

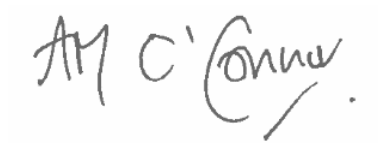
Following adoption of the Variation, the Planning Authority is required to:

- notify the Office within **one week** of the decision to adopt the Variation;
- inform the Office, as soon as practicable, where it decides not to comply with a recommendation, including the reasons for this decision;
- 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; 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,

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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 Regulator and Director of Plans Evaluation

Designated Public Official under the Regulation of Lobbying Act 2015

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