



Comhairle Contae an Chabháin
Cavan County Council

Cavan County Development Plan 2022-2028



CHIEF EXECUTIVES REPORT

PRE DRAFT CONSULTATION 2020



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Section One: Background

1.0 Introduction

Cavan County Council commenced the review of the current County Development Plan and the Cavan Town and Environs Development Plan 2014-2020 and will prepare a new County Development Plan 2022-2028 to incorporate a Local Area Plan for Cavan Town and Environs. In accordance with Section 11 of the Planning and Development Acts 2000 as amended, Cavan County Council gave notice on 18th June 2020 of its intention to commence the review of the existing plans and to prepare a new County Development Plan with a Local Area Plan for Cavan Town and its Environs.

The review of the Plans will take two years and will conclude with the adoption of the new Cavan County Development Plan including a Local Area Plan for Cavan Town and Environs for the period 2022-2028.

1.1 Purpose of the Chief Executives Report

The purpose of the Chief Executives report is to present the outcomes of the initial public consultation phase carried out prior to the preparation of the Draft Development Plan. Under Section 11(4)(a) of the Planning and Development Acts 2000, as amended, the Chief Executive as part of the Development Plan process, is required to prepare a report on the submissions and observations received to the initial public consultation process of the pre Draft Plan, not later than 16 weeks after giving notice that the Development Plan will be reviewed. This report must be submitted to the Elected Members of the Planning Authority for their consideration by 8th October 2020.

The legislative requirement state a Chief Executives Report shall

- List the persons or bodies who made written submissions/observations, as well as any person or bodies consulted
- Summarise the issues raised in the written submissions and during the public consultation events, but shall not refer to a submission relating to a request for zoning of particular land for any purpose
- Give the opinion of the Chief Executive on the issues raised and recommendations, taking account of the proper planning and sustainable development of the area, the statutory obligations of any local authority in the area and any relevant policies or objectives of the Government or of any Minister of the Government
- State the Chief Executives recommendations on policies to be included in the Draft Development Plan
- Summarise the issues raised and recommendations made by the relevant regional assembly and outline the recommendations of the Chief Executive in relation to the manner in which those issues and recommendations should be addressed in the Draft Development Plan.

Submissions pertaining to the zoning of land are prohibited under Section 11 (4)(b)(ii) of the Planning and Development Act 2000, as amended, any submission received in this regard is required to be returned.

1.2 Legislative Background for the making of the County Development Plan

The Planning and Development Acts 2000 as amended, places an obligation on every planning authority to make a Development Plan for its functional area every 6 years. The Current Plans were adopted in May 2014 and came into effect in June 2014 and with the preparation and adoption of the Regional Spatial and Economic Strategy (RSES) these was extended to 2022. The planning authority must review its existing Development Plan and prepare a new one for its area not later than 4 years after the making of a Development Plan.

In accordance with Section 11(1)(a) of the Planning and Development Act 2000 as amended, the review of the existing Development Plans and preparation of a new Development Plan by the planning authority is required to be strategic in nature for the purposes of developing –

- The objectives and policies to deliver an overall strategy for the proper planning and sustainable development of the area and
- The core strategy and
- Shall take account of the statutory obligations of any local authority in the area and any relevant policies or objectives for the time being of the Government or of any Minister of the Government

1.3 Pre Draft Consultation Phase

The pre-draft consultation stage was held from 18th June 2020 to 14th August 2020.

84 written submissions were received during this period. This period was during the Covid Pandemic and therefore restrictions were in place. Despite this, over 100 people attended the information evenings.

The consultation process comprised a number of elements as follows:

1.3.1 Public Consultation Events

Due to the Covid restrictions, an increased number of events with extended timeframes, from 3pm to 8pm, were held in the following towns during the weeks beginning 6th July and 13th July 2020–

- Cavan Town
- Ballyjamesduff
- Arvagh
- Bailieborough
- Ballyconnell
- Cootehill

The events were informal in nature due to Covid restrictions. Workshops exploring the themes of the Issues Paper was not possible due to the restrictions. The Strategic Issues Paper was

available to the public and was displayed at the events. The attendees were invited to discuss any issues with members of the planning staff. Attendees were encouraged to put their submissions or observations in writing and to email or post to the Forward Planning Section by 14th August 2020.

1.3.2 Promotion

The commencement of the review of the Development Plan was advertised in *The Anglo Celt* on Thursday 18th June 2020. Notices of public consultation evenings were published on 2nd July 2020 and the 9th July 2020. Emails were sent to a wide variety of groups and stakeholders, including: social, community, voluntary and sporting groups, statutory agencies, elected members, members of parliament and so forth with a copy of the Strategic Issues Paper and then with follow up emails regarding dates of the public events. LEO also included a link to the Strategic Issues Paper in their Ezine to their members.

Due to Covid restrictions, further advertisement in the Celt was published on 16th July for any person unable to attend the events, to advise that a member of the Forward Planning Team would contact them to assist them as part a of the public consultation phase.

Radio adverts on Northern Sound advertising the public consultation events ran from Friday 3rd July 2020 to Thursday 9th July and again from 9th July 2020 to 16th July 2020. These were targeted to the most listened to slots.

After the public consultation events a series of adverts were ran on Northern Sound advertising that if the public were unable to attend the public evening events that a member of the Forward Planning Team would contact you by telephone to discuss any issues.

1.3.3 Online

A new tab under the Planning section of the Cavan County Council Website was set up called 'Cavan County Development Plan Review 2022-2028'. This included all the information required regarding the Review of the Development Plan and a link to the Strategic Issues Paper. This section also included a video explaining the development plan process and posing questions to provoke submissions and observations.

Cavan County Council also used their Facebook page to notify the public of all issues relating to the review of the Development Plan and raise the profile of ongoing process.

A new email address was created to accept submissions/observations online.

1.4 Zoning Submissions

Zoning submissions have been excluded from this report. Section 11(2)(bc) of the Planning and Development Act 2000 as amended, prescribes that proposals for zoning of particular land for any proposals cannot be considered at this stage of the CDP process. The purpose of the pre consultation stage of the Development Plan making process, is to set out an overall strategy for the proper planning and sustainable development of the County and a broad structure for the Development Plan and the Core Strategy. When a strategy and a set of policies have been determined for the Draft Plan, the issue of zoning will be considered.

Section Two: Northern and Western Regional Assembly Submission

2.0 Introduction

This section contains a summary of the issues raised by the Northern and Western Regional Assembly, and the recommendations of the Chief Executive in relation to the manner in which those issues and recommendations will be addressed in the Draft Development Plan.

2.1 Northern and Western Regional Assembly Submission

No 1: Submission from the Northern and Western Regional Assembly

The forthcoming County Development Plan represents an opportunity to think regionally and operate locally as it gives effect to the Regional Spatial and Economic Strategy (RSES). The Planning and Development Act requires that the County Development Plan is consistent with the RSES, thus enabling full alignment between local, regional and national planning policy.

The Regional Assemblies provide leadership and identify regional development objectives and coordinating initiatives that support the delivery and implementation of national planning and economic policy. This is done through the implementation of the RSES.

The RSES recognises the weak urban infrastructure in our Northern and Western Region which has not prospered economically compared to the two regions. The RSES is responding by adopting a clear strategy that delivers key business elements, namely:

- (1) Development of compact urban centres with critical mass in population; encouraging the revitalisation of urban centres and re-inhabitation of urban cores
- (2) Provision of connectivity and access enabled by physical and technology infrastructures.
- (3) Establishment of competitive, smart and integrated public transport network with and between cities and urban centres
- (4) Nurturing of world class infrastructure and competitive services with capacity, resilience and quality
- (5) Growing our third level infrastructures, access to skills and research, development and innovation
- (6) Availability of property solutions – including ‘ready to go’ commercial properties, ‘landing spaces’, co-working spaces and flexible property solutions and affordable housing
- (7) Co-location or dynamic clustering, enabling connectivity and linkages within and between suppliers and purchasers between enterprises and Higher Education Institutes
- (8) Development of quality of life factors and sense of Place, including harnessing the social, and cultural dimensions of living experience of communities.

The RSES has introduced the concept of a Growth Framework – that links strategic and operational challenges with prioritises for capital interventions. The framework incorporates ‘Five Growth Ambitions’ that define each priority and how they are mutually complementary.

Their vision for the region is smarter, greener, more specialised and connected with a stronger more compact urban network, focusing on 'People' and 'Places'.

The settlement strategy in the RSES focuses on the Metropolitan areas for Galway and regional growth centres of Sligo, Letterkenny and Athlone supported by a network of 'Key Towns' – with Cavan Town being one. Cavan Town provides functions and services to the entire sub region and it is anticipated that it will grow in the lifetime of the RSES by 30%, grow its number of jobs and increase its service provision. It already boasts a high ratio of jobs to resident workers and this can be further reinforced. Key priorities for Cavan Town are to address the lack of suitable zoned lands for economic purposes and a Local Transport Plan for the town.

In respect to the provision of residential land, the RSES recognises the challenges around Cavan Town and Environs area.

The south and east of the county is one of Strategic Potential and it should now be an ambition of CCC to augment Virginia and other medium size towns in the East/South Cavan sub-region with public amenity spaces and other measures to enhance place making and bring further service provision. These settlements, to become self-sustaining, need to grow the ratio of jobs to resident workers and reduce the pattern of long distance daily commuting from Cavan to the Greater Dublin Area.

The RSES contains the ambition to prioritise a programme for serviced sites and this has been incorporated in the Programme for Government. The draft Plan should include specific details on how this measure will be achieved in the county.

The development plan is an opportunity to reflect the rural nature of settlement patterns in the county and how it proposes to balance the needs of all places, including rural towns, villages and rural areas. The plan should seek for vibrancy and vitality of rural areas and consider measures that support the role of smaller and medium sized towns and the regeneration of sites within towns, villages and rural area.

The Growth Ambitions of the RSES offer opportunities to inform the development plan –

Growth Ambition 1 – Vibrant Region – the NWRA believes that strong economic growth, which creates permanent, sustainable jobs is best achieved by a competitive and productive economy. The RSES gives recognition to place-based networks, and reinforces the provision of a suitable framework for tourism development and includes an ambition to develop Tourist/amenity attractions of scale. These ambitions should be considered in the draft plan. The RSES supports the provision of a third level educational facility for Cavan/Monaghan and confirms that the agri-food sector is vital to the region.

Growth Ambition 2 – Natural Region it has been identified that more strategic actions are required to prepare the region for what is to come and these actions need to be cognisant of our natural resources, landscape and heritage. This ambition is transferable to Cavan

Growth Ambition 3 - Connected Region -accessibility and mobility within the region have direct effect on the region's economic competitiveness. The RSES sets out that a prudently managed transport and digital infrastructure is key to delivering their vision. The draft Plan may benefit from the incorporation of Local Transport Plans for Cavan Town and Virginia. This would enable an examination of potential growth of walking, cycling and increased focus on modal shift. In terms of Roads, the by-passing of Virginia is a key Regional project within the NDP. The East West

Route upgrade is recognised within the RSES and there is a number of key routes of strategic importance to Cavan that the RSES have prioritised including N3 upgrade, N54 Cavan-Monaghan and N55 Cavan to Athlone.

Other Visions of the RSES are:

- Strengthen digital network
- Promote smart places
- Support local entrepreneurial ecosystems
- Harness the capacity of local innovation centres

Growth Ambition 4- Quality of Life – Inclusive Region – one of the strongest foundations and emerging propositions this region has to build on is its ‘liveability’. The region aspires to be one of the most liveable places in Europe to live in. The NWRA encourage industries that provide jobs and this requires focus on access to education, health, employment, recreation and opportunity for all. The coordination and delivery of infrastructure, housing and employment land in the right places at the right time is a key outcome, with homes that are affordable. The supply of jobs and homes must be aligned. The draft plan should identify a roadmap to include affordable, accessible homes with land and premises for businesses including smart design and energy efficiency.

Growth Ambition 5- Enabling our Region – the provision and maintenance of economic infrastructure, such as energy, water and wastewater are key to delivering compact growth and a connected, vibrant, inclusive, resilient and smart region.

2.2 Chief Executive’s opinion on issues raised by NWRA

The overall contents of the submission from the Northern and Western Regional Assembly are noted. The draft Plan will comply with the objectives and recommendations set out on both the National Planning Framework (NPF) and the Northern and Western Regional Spatial and Economic Strategy.

CCC is supportive of the policies and objectives in the Northern and Regional RSES that in order to prosper, the draft Plan should incorporate aims for compact urban centres, improved connectivity and infrastructure, improved public transport, growth in third level infrastructure, available priorities and lands for commerce and industry, affordable housing, clustering of suppliers and purchasers and development of the quality of life for the people of the region.

2.3 Chief Executives Recommendations

That the Core Strategy complies with the objectives of the NPF and RSES.

That sustainable transport objectives are included in the draft plan.

That the draft plan includes supportive policies and objectives that will result in the reversal of commuting for work outside the County.

That the draft Plan supports the acquisition and servicing of suitable lands for economic purposes.

That the draft Plan includes policies and objectives that delivers development into the centres of our towns and villages.

That the draft plan includes policies and objectives that supports residential development in rural towns and villages.

That the draft Plan considers land use and transportation in its preparation and considers relevant plans/studies as appropriate, which have been completed to date.

That the draft plan supports educational facilities in the county and any linkages same has to economic and industrial enterprises in the county.

That the draft plan ensures there is sufficient lands available for economics and industries in the County, that is serviceable and accessible.

That the draft development plan supports the development of public realm, open space, greenways, blueways, and supports for a good quality of life in the County.

Section Three: Submissions

3.0 Introduction

This section contains a summary of the written submissions received as part of the Pre Draft consultation phase from Prescribed Bodies and Stakeholders, and the opinions and recommendations of the Chief Executive to the issues raised within.

3.1 Submissions from Prescribed Bodies & Stakeholders

No. 2: Submission from the Office of the Planning Regulator

The Office of the Planning Regulator welcome the opportunity to make a submission and details the statutory parameters of the submission. The OPR request consideration be given to the following in formulating the draft plan.

Consultation Strategies

The Office of the Planning Regulator commends the planning authority for the strategy as part of the public consultation process, including public events, radio adverts and opportunities for one-to-one consultation, in particular the use of social media and video. The OPG requests Cavan County Council to forward appropriate feedback on the effectiveness of the planning authority's consultation approach.

Core Strategy & Settlement Strategy

The submission notes that forming the Core Strategy in line with Section 10 of the Act is the most significant element. The submission also notes other key determinants in making the Core Strategy, including the National Planning Framework (NPF), the Regional Spatial and Economic Strategy for the Northern and Western Regional Assembly, Ministerial Guidelines.

The submission also make reference to the concept of “*Compact Growth*” in the NPF and the National Policy Objective (NPO) 3c 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*”. The submission notes that the Issues Paper does not make reference to either concepts and advises that the policies and objectives in the plan will need to make clear reference to these aspects of national planning policy.

The submission also states the NPF target population for County Cavan of 83,000-84,500 by 2026 and 86,000-88,000 by 2031 which represents a population increase for the county of 7,000 to 8,500 people to 2026 (above its 2016 census figure of 76,000). Cavan's 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 NFP and the RSES concerning the distribution of population growth. 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*.

Local Area Plans

The submission notes the requirement under the planning and development act to prepare a Local Area Plan (LAP) for Cavan Town. The OPG welcomes the planning authority's proposal to advance the LAP and merge into the process of preparing the new development plan.

The OPR also advises Cavan County Council to consult with the NTA regarding any updates or revisions required to the current Local Transport Plan for Cavan Town for the LAP.

Urban Regeneration

The submission notes that 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. One of the key priorities 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"*. By acknowledging that the key towns including Cavan Town (which is 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.

Economic Development & Employment

The submission makes reference to the county's economic base expanding from a previous reliance on the agricultural sector and agri-related activities to a stronger presence in the industrial, enterprise and service sectors.

The current high jobs ratio 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. Most of the tier 2 towns have a ratio of jobs to resident workers significantly below 1.0 which indicates high levels of outbound commuting from these settlements. This is a significant issues to be addressed in the plan.

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 planning and national roads.

Transport and Infrastructure

The Issues Paper notes that a successful transport system is dependent on co-ordination and integration with land-use planning.

It is essential for Cavan County Council to achieve a significant modal shift in the county. The OPR encourages Cavan County Council to include modal shift targets to be achieved over the plan period, aligned to relevant implementation measures.

The submission also notes that the NPF sets out a two-tier approach to land zoning. It is requested that particular attention is drawn to the requirement in NPO 72a which reads:

"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".

With regard to wastewater and water infrastructure provision, 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 the RSES.

A key issue for the 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 short distances, in the absence of long term public transport infrastructure. It is also states that 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)*. The implementation of the Design Manual for Urban Roads and Streets, 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.

Rural Development

The submission acknowledges that “...there remains an on-going demand for rural dwellings” and states the importance of the development plan providing an appropriate balance between policies supporting rural housing and those that proactively address issues of town and village decline and compact growth. The submission affirms that the plan’s policies will need to demonstrate consistency with NPO 19 and NPO 20 and RPO 3.3 which seeks to “*deliver at least 20% of all new housing in rural areas on brownfield sites*”.

It is also noted that the plan will need to take into account 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.

Strategic Flood Risk Assessment

The OPR makes reference to the requirement to prepare a Strategic Flood Risk Assessment as part of the development plan process. With regard to same, the OPR advises against the use of information from the Office of Public Work’s Preliminary Flood Risk Assessment and arterial drainage benefitting land maps to inform the SFRA. Cavan County Council will need to undertake adequate flood risk assessment to determine if there is sufficient information to inform zoning decisions or if further detailed analysis is required.

Climate Action and Energy

The submission notes that having regard to the *Climate Action Plan 2019* and 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 submission highlights climate change mitigation measures pertinent to section 10(2)(n), section 6.2 – Transport and section 6.3 – Transport Investment Priorities noting specific policies within the RSES which are relevant regarding the integration of land use and transport planning.

It is notes that the promotion of renewable energy sources within the county in accordance with section 28 *Wind Energy Development Guidelines (2006)*, Circular Letter PL 2/2017: *Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change and Wind Energy Development Guidelines 2006 – Update on Review* (July 2017), and any

replacement guidelines issues by the Minister, will be critical to ensure Ireland meets its national targets and commitments to increase renewable energy supply and reduce greenhouse gas emissions.

The submission requests that Cavan County Council give attention to the Special Planning Policy Requirements (SPPR) under the aforementioned interim guidelines. The latter requires Cavan County Council to indicate how the implementation of the relevant development plan or LAP over its effective period will contribute to realising national targets on renewable energy and climate change mitigation, in particular wind energy production and the potential wind energy resource.

The following points are noted in the submission summary:

The OPR commends Cavan County Council on the preparation of the Issues Paper, supporting consultation material and strategies to engage with the community.

It is requested that Cavan County Council pay particular attention to the following:

- National and regional objectives for population growth, compact growth and regeneration in determining the Core Strategy, including the settlement hierarchy. A significant proportion of the county's future population growth should be directed to Cavan Town and other key settlements like Virginia. It is also noted that this settlement hierarchy should inform the quantum of land zoned for residential development on other settlements, and the allowance allocated to the rural remainder.
- The coordination of economic development and employment with population growth which capitalises on strengths 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 on 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.
- The development of rural housing policies that are consistent, and which 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 the 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 resources within the county in accordance with the relevant section 28 guidelines.

Chief Executive's opinion on issues raised

The overall contents of the submission from the OPR are noted. The draft Plan will comply with the objectives and recommendation set out on both the National Planning Framework (NPF) and the Northern and Western Region's Regional Spatial and Economic Strategy (RSES). The Draft Plan will incorporate an evidence based Core Strategy that will accord with the provisions set out in the Planning and Development Act 2000, as amended and the NPF, ensuring that development is supported and integrated with a range of accessible community facilities in a sustainable manner. The population targets and housing allocation for the County will include an analysis of current demographic and population data trends, using available sources of material as appropriate. The Core Strategy will form the basis for objectives and policies, throughout the Plan, including population targets, settlement strategy, density considerations, economic development and quantum of lands to be zoned for residential and mixed uses, in an evidence based and sequential manner.

Economic development within the County is a strategic corporate goal for the Council, and the Draft Plan will continue to enable economic growth, enterprise development, attract appropriate investment and promote sustainable tourism. Existing and future employment lands will be reviewed during the Development Plan process to ensure the potential for sustainable economic growth is maximised in appropriate locations. This will be supported by the LECP.

The Draft Plan will continue to support sustainable rural development and the development of the tourism industry, and ensure the continued conservation of the County's natural, cultural and built heritage.

The importance of tourism in the Cavan economy is acknowledged and accordingly supportive policies and objectives will be included in the draft County Development Plan.

The Cavan County Climate Change Adaption Strategy will inform objectives and policies in the draft Plan in terms of sustainable development, energy use and travel patterns.

The Draft Plan will be informed by, and compliant with national, EU and International law including environmental directives, and consideration of flood risk management plans, climate change mitigation and adaption, river basin management plans, impacts on water quality, biodiversity and landscape assessment.

Chief Executives Recommendations

That the Core Strategy complies with the objectives of the NPF and RSES.

That sustainable transport objectives are included in the draft plan.

That the draft plan includes supportive policies and objectives that will result in the reversal of commuting for work outside the County.

That the draft Plan supports the acquisition and servicing of suitable lands for economic purposes.

That the draft Plan includes policies and objectives that delivers infill/brownfield development in towns and villages.

That the draft plan includes policies and objectives that supports residential development in rural towns and villages

That the draft Plan considers land use and transportation in its preparation and considers relevant plans/studies as appropriate, which have been completed to date.

That the draft plan includes supportive policies and objectives for the delivery of sustainable tourism in the County.

That the draft plan includes policies and objectives in respect of climate change and flooding.

No.3: Submission from the Eastern and Midland Regional Assembly (RSES)

The council will be aware of the finalisation of the RSES for the Eastern and Midland Region which was made up on 28th June 2019. The RSES sets the context for each local authority to develop their county and city development plans in a manner to ensure national, regional and local plans align. The RSES identifies regional assets, opportunities and pressures and provides appropriate policy response in the form of Regional Policy Objectives.

The Planning Authority shall ensure that when making the County Development Plan. It is consistent with the RSES for the region.

The Issues Paper states that the development plan will provide a strategic framework and land use strategy for the proper planning and sustainable development of the County. The Plan must also take account of Project Ireland 2040, the National Planning Framework and the Northern and Western RSES. County Cavan has an easterly focus and borders the Eastern and Midland Region and therefore shall be cognisant of the long term strategic planning and economic framework of the adjoining Eastern and Midland Region, as expressed in the EMRA RSES.

County Cavan comprises part of the North East functional area with County Louth, where the key driver is the Dublin Belfast cross border network. A significant growth enabler for the Eastern and Midland Region is the development of the Dublin-Belfast Economic Corridor. The Dublin-Belfast Economic Corridor and the Regional Growth Centres of Drogheda and Dundalk have a significant reach into the central border counties including East Cavan. This corridor is underpinned by a strong sense of transport infrastructure that connect the two main cities. Its area of influence hosts a combined population between NI and Republic of more than 3.3. million people, of which Newry, Drogheda and Dundalk are part. The Corridor offers strategic connections through links with the TEN-Network and the Dublin Rosslare route.

To support economic growth and competitiveness and realise the potential of the Dublin-Belfast Economic Corridor continued cross border collaboration and co-operation between relevant local authorities, departments, agencies and stakeholders will be necessary. The Planning Authority is directed to RPO 8.11 and 8.12 which support improvement and protection of the EU TEN-T network and strategic function of this corridor and this should be recognised in the Cavan County Development Plan, this is also supported in the NWRA RSES.

Chief Executive's opinion on issues raised

The issues raised in relation to the proximity of the East of County Cavan to the Eastern and Midland Region is noted.

The proximity of East Cavan to the Dublin Belfast Economic Corridor and the Regional Growth Centre of Drogheda and Dundalk will be considered in the draft Plan.

Chief Executive's Recommendations

The draft Plan to include policies and objectives that support improvement and protection of the EU Ten-T network and the Dublin-Belfast Economic Corridor

No. 4: Submission from the Environmental Protection Agency

The EPA is one of 5 statutory environmental authorities under the SEA Regulations. They focus on promoting the full and transparent integration of the findings of the Environmental Assessment into the Plan and advocating that the key environmental challenges for Ireland are addressed as relevant and appropriate to the plan.

Reference is made to the document 'SEA of Local Authority Land Use Plans – EPA Recommendations and Resources' which should be taken into account in preparing the Plan and the SEA. CCC should ensure that the Plan aligns with key relevant higher-level plans and programmes of the NPF and the RSES for the Northern and Western Region. The submission includes the following specific comments on the following themes:

Climate Action

In preparing the Plan there is a need to align with national commitments on climate change mitigation and adaption. Reference documents in relation to same are included as part of the submission.

Biodiversity

CCC should promote the need to protect non-designated aspects of biodiversity including ecological corridors/linkages/green infrastructure and areas of important local biodiversity. A clear commitment should address the control and management of invasive species.

Adjoining local authorities and equivalent authorities in Northern Ireland should be consulted in the preparation of the Plan and SEA.

Links to a number of reference documents in relation to Sustainable Development, Tourism, Climate, Biodiversity, Water and Water Services, Transport and Air and Noise

The Environmental Sensitivity Mapping (ESM) Webtool is a support tool to assist SEA has planning processes in Ireland

EPA SEA WenGIS Tool -allows public authorities to produce an indicative report on key aspects of the environment in specific geographic areas.

EPA WFD Application – provides a single point of access to water quality and catchment data from the national WFD monitoring programme.

EPA AA GeoTool - allows users to select a location, specify a search area and gather available information for each European Site.

State of the Environment Report -Irelands Environment 2016 – the recommendations, key issues and challenges described in this report should be considered as relevant and appropriate to the Plan.

The Plan needs to align with national commitments on climate change mitigation and adaption, as well as relevant sectoral, regional and local adaption plans.

Under SEA Regulations CCC should also consult with the Minister for Housing, Planning and Local Government, the Minister for Agriculture, Food and Marine and Minister for Communications, Climate Action and Environment and Minister for Culture, Heritage and the Gaeltacht and any adjoining planning authority whose area is contiguous to the area of the planning authority.

Chief Executive’s opinion on issues raised

Environmental Assessment is an iterative process as preparation of the Draft Plan progresses and the SEA process will significantly influence the development strategy., policies and objectives of the Draft Plan.

The key actions in ‘Irelands Environment 2016’ are key parameters which will be considered and integrated throughout the draft Plan and specifically within the climate change, environment and waste sections of the Draft Plan.

Chief Executive’s Recommendation

That the draft Plan is prepared and influenced by the SEA process.

That the draft plan includes climate action sections that adheres to national guidance.

No. 5: Submission from Geological Survey Ireland, Department of Communications, Climate Action and Environment

This submission explains the role of Geological Survey Ireland and gives an overview of what work has and is being completed by GSI. This also outlines what material, mapping, etc which is available to the local authority. The submission is subdivided into themes containing a number of recommendations to the local authority:

Geoheritage – the Cavan Geological Heritage County Audit was completed in January 2013 which was an action of the County Cavan Heritage Plan 2006-2011. The 28 County Geological sites play an important role in Cavan’s natural heritage and landscape and require protection and preservation from potential over development, pollution and illegal dumping.

GSI would like to see the inclusion of the following policy objective in the plan

‘to protect from inappropriate development the scheduled list of geological heritage sites’ or ‘to protect from inappropriate development the following list of County Geological Sites’

The IGH views local authorities as critical partners in protecting County Geological Sites and provides protection against potentially damaging development that normally require planning permission such as building, quarrying, landfilling or forestry.

Culture and Tourism

Geology has become a large part of Irish tourism. Ireland has 3 UNESCO Global Geoparks including the Marble Arch Caves UNESCO Global Geopark. These have helped bolster tourism. GSI encourage CCC to continue to use geological audit information making it easily available to the general public.

Groundwater

This is important as a source of drinking water and support river flows, lake levels and ecosystems. Groundwater needs to be understood, managed and protected. GSI provides advice and maps about groundwater quality, quantity and distribution. GSI Monitors groundwater nationwide by characterising aquifers, investigating karst landscapes and landforms and protecting public and group water supplies.

With regard to Flood Risk Management, there is a need to identify areas for integrated mitigation and management. The GW Flood project is a groundwater flood monitoring and mapping programme aimed at addressing the knowledge gaps surrounding groundwater flooding in Ireland.

With regard to Climate Change there is a need to improve the monitoring capacity of groundwater levels in Ireland so potential impacts of climate change can be monitored and assessed. GSI have established the GWClimate project in January 2020 to establish long term strategic groundwater level monitoring network and to develop modelling and analytical approach for evaluating the impacts of Climate Change to Irish groundwater systems.

Geohazards

These can cause widespread damage to landscapes, wildlife, human property and human life. In Ireland, landslides are the most prevalent hazard and flooding is becoming an increasing risk. Geohazards and particularly flooding should be taken into consideration especially when developing areas, where the risks are prevalent.

Geothermal Energy

This harnesses the heat from beneath the surface of the earth. It is proven secure, environmentally sustainable and cost effective. These applications can range in depth and can be explored for both domestic and commercial use. The GSI's Geothermal Suitability Maps can help determine the most suitable type of ground source heat collector.

Natural Resources

GSI draw our attention to 'Active Quarries', 'Mineral Localities' and 'Aggregate Potential' layers on their Map Viewer. These can be used to promote sustainable development and reduce carbon footprint of buildings by using local stone to build.

Chief Executive's opinion on issues raised

The issues raised in relation to recommendations and advice in the review of the CDP are noted and will be considered as part of the preparation of the Draft Plan. The Council acknowledge the material, mapping and other resources which is available and these will be beneficial tools in the preparation of the draft plan. It is recommended that policies and objectives are included within the Draft Plan which seek to protect the County's natural heritage sites.

Chief Executive's Recommendation

CCC is aware of its role in the preparation of the CDP in the protection and preservation of the natural heritage and landscape of the County. The Draft Plan will include policies and objectives to protect, promote and manage the County's natural and cultural heritage.

The draft Plan will continue to protect the natural resources of the County including the UNESCO Global Geopark (Marble Arch Caves) and the groundwater. Flooding will be considered in the draft Plan and alternative energy sources will be encouraged through appropriate policies and objectives.

No. 6: Submission from the Office of Public Works (OPW)

The OPW welcomes the opportunity to comment on the Issues Paper in the preparation of the Cavan County Development 2022-2028.

The Submission is divided into the following headings:

Flood Risk Management (FRM) – General Guidance

The submission requests that reference be made to the Guidelines on the Planning System and Flood Risk Management as issued under Section 28 of the Planning Acts, and associated Circulars and Technical Appendices, to ensure that the key principles of flood risk management and sustainable planning are adopted. It is also noted that the sequential approach to managing flood risk within the Planning System should be considered at an early stage, and where uncertainty exists the precautionary approach should be taken or more detailed assessment carried out. The submission notes that the guidelines set out a three Stage Flood Risk Assessment. The submission contains an overview of each stage: *Stage 1 Flood risk identification, Stage 2 Initial flood risk assessment and Stage 3 Detailed flood risk assessment*.

In addition, the OPW recommend that particular attention be given to the following sections of the Guidelines: *Chapter 3 – The Planning Principles, Chapter 3 – The Sequential Approach, and definition of Appropriate Development, Chapter 3 and 4 – The Plan-making Justification Test*.

The OPW also advise clear commitments and strategic objectives regarding flood risk to be included in the Draft Plan and an undertaking given to correctly implement and abide by the "Planning System and Flood Risk Management Guidelines (2009)".

Specific Flood Risk Management Issues for Consideration

The Flood Risk Management Plans and Flood Maps

The submission references the National Catchment-based Flood Risk Assessment and Management (CFRAM) Programme, completed by the OPW in conjunction with Cavan and other County Councils, through which Flood Risk Management Plans (FRMPs) and flood maps were prepared. The CFRAM Programme included analysis of flood risk in Ballyconnell and Cavan. With regard to this, the following requests form part of the submission:

- Cavan County Council to have full regard to the proposed development of flood relief scheme in Cavan, to ensure that zoning or development proposals do not impede or prevent the progression of these measures.
- The flood maps, including those for potential future scenarios taking account of the possible impacts of climate change, are available to view on the OPW portal, and may be obtained in GIS format from the OPW Data Management Section.

Consideration of Climate Change Impacts

The submission notes that the potential impacts of climate change include increased rainfall intensities, increased fluvial flood flows and rising sea levels. The submission states that in line with the guidelines although Flood Zones are defined on the basis of current flood risk, planning authorities need to consider climate change impacts when preparing plans. The following examples are included: avoiding development in areas potentially prone to flooding in the future, providing space for future flood defences, specifying minimum floor levels and settling specific development management objectives. The submission also notes that flood maps prepared under the CFRAM Programme include maps for two potential future scenarios taking account of different degrees of climate impact.

Impacts on Other Areas

The submission explains that while a specific development may not be susceptible to flood risk, it can increase flooding up-or down-stream, due to increased runoff from additional drainage or increased paved areas or to loss of storage. It is further noted that, in line with the guidelines, proposed new development needs to avoid increasing such flood risk elsewhere.

Natural Water Retention Measures

The OPW recommends that the preparation of development plans take account of the opportunities for natural water retention measures to reduce runoff and provide other benefits such as to water quality, biodiversity, etc. The submission notes that this can include areas around existing developments, as well as within existing and proposed development in the form of Sustainable Urban Drainage Systems (SUDS).

Chief Executive's Opinion on Issues Raised

The comments made by the Office of Public Works are noted and will be incorporated into the Draft Plan as appropriate. A Flood Risk assessment will be carried out in conjunction with the preparation of the draft Development Plan. The impacts of climate change and the planning

considerations and solutions for same will be a core theme throughout many chapters of the proposed draft development plan.

Chief Executive's Recommendation

That a Flood Risk Assessment is carried out in conjunction with the preparation of the draft Development Plan.

That water retention measures and its benefits to water quality and biodiversity is considered in the preparation of the draft plan.

That climate change actions that can be influenced by planning policies and objectives are included in the draft development plan.

No. 7: Submission from the Department of Culture, Heritage and the Gaeltacht

Architectural Heritage

Built Heritage Policy (DCHG) recommends built heritage is considered an integral part of the wider built environment. The Department recommends the appointment of an Architectural Conservation Officer. A number of policy documents are referenced -

1. Heritage Ireland 2030
2. Climate Change Sectoral Adaptation Plan for the Built and Archaeological Heritage
3. National Policy on Architecture

These documents position built heritage as a central and integrated theme and they would welcome the policies and objectives of same being inserted into future development plans.

The following are a number of key areas that require greater attention and focus in the future development plan

- Climate change -appropriate measures to ensure long term survival of historic structures
- Town revitalisation- policies for heritage led urban regeneration
- NIAH -National Inventory Architectural Heritage- use building and garden survey to inform policy and planning
- Vernacular heritage - address the incremental damage and cultural loss due to lack of awareness, vacancy and demolition
- National Policy on Architecture – Places for People -5 themes to be embedded in the future development plan policies to ensure delivery of and implementation of government policy.
- Heritage Ireland 2030- 3 strands to be embedded with the importance of communication, digital opportunities and community engagement as part of the delivery of built heritage policies
- Flood Relief works - attenuation, upgrading and repair of existing infrastructure, high quality design of new infrastructure and coordination with public realm/recreational amenity in urban centres
- Tall building in historic urban centres – mitigation of negative impact on historic character areas and urban landscape.

The following themes are recommended for inclusion:

Local Authority Climate Change Strategy

- DCHG have published a '*Climate Change Sectoral Adaption Plan for the Built and Archaeological Heritage*' (2018). Climate change can accelerate decay or overwhelm the capacity of older structures to deal with severe weather and increased extremes of wetting and drying or cold or heat.
- Include objectives to carry out climate change risk assessments for historic structures in the functional area, particularly in ownership of the local authority.
- Include objectives to develop disaster risk reduction policies addressing direct and indirect risks.
- Include objectives to develop resilience and adaption strategies
- Develop skills capacity within the local authority to address adaption/mitigation/emergency management issues
- Architectural Conservation Officer/ Heritage officer should be included in local authorities Adaption Steering Group

Revitalisation of Historic Urban Centres

The Department is developing a National Policy on Architecture (NPA) under several themes all of which are applicable to the future sustainable development of town centres.

Policy

- To consider concepts of historic urban landscapes as a collection of buildings at the various scales of settlement which give rise to their special characteristics – including setting, topography and natural features.
- To consider Town Centre First Approach – which puts town centres at the heart of decision making to revitalise historic urban centres,
- To promote the development of heritage led regeneration and plan for re-use and conservation.
- Promote best conservation practice
- Support sustainable infill to the town backland that is appropriate in scale and character.
- Compile core data information about the built and archaeological evolution of historic places
- Coordinate significant infrastructural projects such as public realm works, flood relief works or new transport routes and alternative modes of transport to the benefit of surviving historic sites.

The NIAH -National Inventory of Architectural Heritage Building Survey

The Minister for Culture, Heritage and the Gaeltacht may make recommendations to a planning authority concerning the inclusion of particular structures to the Record of Protected Structures.

The purpose of the NIAH is to identify, record and evaluate the post 1700 architectural heritage of Ireland.

Recommended Policy

- To consider for inclusion all structures identified by the NIAH and recommended by the Minister for Culture, Heritage and the Gaeltacht in the Councils RPS.
- To consider that all such structures be regarded as Candidate Protected Structures' pending verification by the council and inclusion in the RPS.
- Direct users of local authority services to the information on NIAH website

NIAH – Garden Survey

The NIAH has compiled a record of significant historic designed landscapes, demesnes and gardens throughout the country.

Policies

- To identify significant historic designed landscapes, demesnes and gardens for protection under the development plan.
- To designate Architectural Conservation Areas to protect historic designed landscapes, demesnes and gardens.
- To identify and protect significant views to and from such places
- Encourage Conservation Plans of cultural landscapes
- To cooperate with NIAH in assessing and celebrating historic designed landscapes, demesnes and gardens.
- Encourage retention and maintenance
- Encourage cataloguing of plant collections, trees and habitats and fauna
- Protect and promote heritage and traditional varieties of plants and trees
- Promote awareness, enjoyment and access to these sites.
- Preserve and protect biodiversity
- Promote conservation, renewal and improvement that enhances the character and setting of these historic designed landscaped.
- To require a detailed appraisal of potential impacts of any development proposed for within or adjacent to these places
- Have regard to Guidance Notes for the Appraisal of Historic Gardens, Demesnes, Estates and their Settings and Architecture Heritage Protection Guidelines

Vernacular Architecture

Majority dates from the 18th and 19th centuries, Vernacular buildings through their siting, orientation and materials display an intimate connection with their landscape. Their materials and methods are most appropriate for the repair and offer potential for new work.

Policies

- Recognise vernacular building are characteristic of our local communities
- Promote appropriate rehabilitation, revitalisation and re-use of vernacular buildings
- Proposals for sensitive rehabilitation of disused vernacular houses will not be subject to Rural Settlement Strategy
- There will be a presumption against demolition of vernacular buildings
- To recognise inherent sustainability of vernacular buildings
- Ensure continued and appropriate rehabilitation in the interests of sustainability
- Ensure conservation and reuse of traditional materials

- Retention and careful rehabilitation of historic landscapes allows materials and embedded energy of these structures to be harnessed. Where demolition is sought – a detailed report on existing condition by professional with conservation expertise shall be submitted
- Where building destroyed by fire or accident a report by professional on cause and extent of damage should be required
- Ensure measures to upgrade energy efficiency does not have detrimental physical or visual impact
- Promote and support well informed energy efficiency
- Encourage sensitive reuse of vernacular houses or farm buildings
- Protect, maintain and enhance established character and setting of vernacular buildings, farmyards and settlements
- Development to be accompanied with detailed measured survey, photographic record, written report carried out by professional
- Facilitate appropriate, high quality design solutions for adaptations
- When extending vernacular buildings - design, scale, footprint and materials to be sympathetic to existing
- Promote protection and maintenance of character and setting of vernacular buildings, farmyards and settlements
- Developments proposed within or adjacent to vernacular settlements should respect and enhance their spatial character, building forms, features, details and materials
- Promote the protection and maintenance of thatched buildings and maintain an up to date record of thatched buildings.

Rural Settlement/ Architectural conservation

Consider the protection of vernacular settlements by means of Architectural Conservation Area designation. Promote the reuse of disused or unoccupied buildings.

New National Policy on Architecture

The proposed new National Policy on Architecture will support high quality architecture and an opportunity for local authority to create conditions for high quality, low carbon and more resilient built environment for future generations. The policy will focus on 5 themes

1. Designing for climate resilience and sustainability
2. Designing quality spaces for public benefit
3. Respecting our past, shaping our future
4. Leadership
5. Knowledge and innovation

These 5 themes should be included in objectives and policies of the development plan

Heritage Ireland 2030

This is a new National Heritage Plan which will set out the key principles and policies for conserving and managing Irelands heritage. The plan is due to be published later this year. It will:

- Embrace and support existing policies and initiatives
- Further policy backing for mitigation of climate change impacts and protection of biodiversity
- Build connections between related initiatives and ensure coherence

- Provide a bridge between our tangible built and natural heritage and intangible heritage like language, cultural traditions
- Will strengthen aspects of diverse heritage and all bodies which protect and manage Irelands diverse heritage to engage – public authorities, communities, enterprise and NGO's.

Heritage Ireland 2030 is formed around 3 themes

1. Communities and Heritage
2. Leadership and Heritage
3. Heritage Partnerships

These should be embedded in the LA Development Plan

Nature Conservation

Department has a role as a statutory authority with responsibility for nature conservation and the nature directives (Birds and Habitats Directive).

Government policy on nature conservation:

This is set out in the National Biodiversity Action Plan 2017-2021 and Ireland is fully committed to halting the loss of biodiversity and degradation of ecosystem services as set out in the EU Biodiversity Strategy to 2020. Biodiversity is in general under threat at a global, national and local scale. There is a need to protect our resources and a county development plan that has biodiversity embedded in its core principles will help build a county that is a healthy place for its people and visitors and provide a fully functioning and resilient ecosystem.

Nature Conservation within the plan

The draft plan should set out the legislative requirements in relation to the protection of sites and species but it should also ensure that the legislative requirements and Government policy on biodiversity can be delivered. Biodiversity should be integrated into all aspects of the plan and should ensure that measures are appropriate to the situation and sustained long term -i.e. evidence based solutions to biodiversity protection and enhancement. The Department encourages the use of Environmental Sensitivity Mapping and Ecosystem Services Scoring to avoid impacts on Natura 2000 sites. The plan should avoid policies and objectives that undermine or are in direct conflict with natural heritage policies. There should be a commitment in the plan to undertake AA, EIA, Ecological Impact Assessment as required and appropriate in relation to plans and projects.

Natural Heritage Objectives

It is hoped the existing strong commitment to biodiversity protection in the current plan will continue. The Department commend the council on their achievements and acknowledges the positive initiatives of the CCC Heritage Officer and Heritage Forum. – e.g. gardening for biodiversity, conserving hedgerows, wetlands survey, hedgerow habitats.

The council should build on its work and strengthen biodiversity protection. Nature conservation objectives should be clear and robust and include objectives to protect, conserve and enhance biodiversity both within and outside protected sites.

Threats and Pressures on Nature Conservation

County Cavan contains numerous habitats and species of international and national importance. The Department notes that CCC is fully committed to the protection of designated sites but notes the additional pressures on biodiversity.

The draft plan needs to recognise the potential for tourism and recreation to impact such sites and address these in SEA and AA of plan.

Clear robust objectives are required in respect of species such as otter and bat species. The loss of trees and hedgerows can impact on bat species and their wildlife and affect their connectivity of hedgerows as wildlife corridors.

Bat roosts can also be affected where older buildings are being redeveloped. A specific objective requiring surveys for these species and other species protected under the Wildlife Acts should be included in the development plan.

Lighting objectives should be included for town and rural areas, as incorrect types can have an impact on bat species or other wildlife.

The SEA, AA and SFRA should apply the precautionary principle to ensure there is no further deterioration of habitats or species. The Plan needs to ensure unauthorised development is addressed to ensure development does not impact on biodiversity.

Department would welcome a policy where all public buildings incorporate positive biodiversity measures as standard practice. e.g. nesting boxes for swifts and/or bat boxes

CCC could enhance biodiversity by mapping the extent of hedgerows and identifying gaps and include a pollinator plan for the county with particular attention to roadside verges, roundabouts and council lands

Department highlights the threat of Invasive Alien Species and recommends specific objectives in relation to containment and control of IAS.

The Department recommends a strong and clear policy objective in the development plan in relation to peat extraction to ensure clarity in relation to requirements for planning permission. The draft plan should support the implementation of the National Raised Bog Special Areas of Conservation Management Plan 2017-2022 and restoration measures currently underway to protect and enhance raised bog habitats e.g. Kilconny Bog SAC.

Green Infrastructure

The Department advise that the promotion of green infrastructure should be integrated into developments in large urban centres with a commitment to reversing the loss of green urban ecosystems. The Department would welcome the commitment in the plan for an overall green infrastructure strategy for the county. Proposals need to ensure that impacts to biodiversity and nature conservation interests are avoided.

Climate Change

County Cavan is a rural county and ultimately should avoid the fragmentation of landscape features including corridors.

Monitoring Impacts of the plan on Biodiversity

Particular attention needs to be placed on the SEA of the development plan whereby Member States are required to monitor the significant environmental effects of the implementation of the plan. Monitoring during the plan implementation allows for corrective action and intervention if environmental damage is noted. The Department would welcome the monitoring of Ammonia and Nitrogen deposition impacts on NATURA 2000 sites within the draft plan's zone of influence in the SEA. The Department would welcome a clear and specific monitoring plan to be included in the Strategic Environmental Report that outlines how it is proposed to record the impacts of plan implementation on biodiversity, both in terms of loss and enhancement during the lifetime of the plan,

Chief Executive's opinion on issues raised

The issues raised in relation to the built and natural heritage of the County are noted. The suggested policies for inclusion in the draft plan are noted and updated national documents in relation to our natural and built heritage will be referenced.

The protection of our natural and built heritage is a core aim of the draft plan and CCC will continue to liaise with the Department of Culture, Heritage and the Gaeltacht to include an appropriate level of protection.

Chief Executives Recommendations

That the draft plan includes policies and objectives for the protection of the Country's natural and built heritage.

That the draft development plan protects the natural and built heritage and encourages appropriate uses/reuse of same. It will further ensure that the natural and built heritage of the County is safeguarded for future generations.

The draft plan is informed by the SEA process.

No. 8: Submission from the Department of Defence

The Department notes the many historical links with Cavan. The submission also notes that this department is a significant employer in the North Leinster Region. The Department places great value on further developing the existing strong relationship between local government and communities and the Defence Forces in this area. It also supports the goal of developing objectives and policies to deliver an overall strategy for the proper planning and sustainable development of the area.

Chief Executive's opinion on issues raised

The good working relationship between Cavan County Council and the defence forces in the area is acknowledged and will be continued to be supported in the Draft County Development Plan. The Draft Plan will aim to develop sustainable communities and promote a high quality of life for the people of Cavan by leading economic and community development, and ensuring a supportive physical and social infrastructure is developed, in the interest of the sustainable development of the County.

Chief Executives Recommendations

The Draft Plan will promote collaboration and interagency work between key agencies, stakeholders and the public to aid the development of socially and economically balanced sustainable communities and assist in the actions and implementation of the LECP as appropriate. Sustainable Communities and place-making, including creating attractive places for people to invest, live, work and visit are core themes of the Draft Plan and accordingly will be explored in individual chapters in the Plan.

No. 9: Submission from the Department of Education and Skills

The population growth combined with the NPF focus on compact growth and sustainable development requires collaborative engagement between the Department of Education and planning authorities to support the provision of additional and enhanced education facilities in our communities.

The Department will work with CCC to identify projected population growth to a circa 10 year horizon to make sufficient provision for planning and construction of school and further education accommodation where necessary.

As more specific population and housing growth figures become available, the Department will analyse these in the context of existing and planned school provision.

The Department requests that new plan would be explicit in its support for the provision of accommodation for schools, including the development of new schools and expansion and alternation of existing ones. The Plan should include policy objectives on both the provision and new schools and the protection of existing schools and development of wider infrastructure and amenities objectives to support both categories of school serving communities. Include buffer zones and designations that support education development adjacent to existing and established schools.

That CCC continues the land use zoning 'Public and Community' in which schools are permitted where appropriate.

It is critical that any school sites required to meet current needs or planned population growth should be explicitly supported by means of an appropriate zoning provision and/or Specific Local Objectives on the subject site.

The proposed development of sites already identified by the Department for school provision should be explicitly supported by appropriate zoning and/or Specific Local Objective.

CCC should facilitate the principle of permitting schools, both permanent and temporary in as many zoning categories as possible

The Departments current Technical Guidance Documents on school site identification and suitability assessment is available online. Revised guidelines for schools in urban areas will be published in 2020.

CCC should consider the potential synergies with adjacent public and commercial facilities in the proposed siting of schools.

That the capacity of existing schools and any planned schools as published by the Department be considered as ‘supporting infrastructure and facilities’.

Department would welcome CCC support for proposal to enhance educational facilities in Cavan Town- specifically for Cavan College of Further Education and for Gaelscoil Bhreifne.

Chief Executive’s opinion on issues raised

Cavan County Council acknowledges the strong link between a well-educated workforce and economic prosperity and support continued educational investment in the County. While the delivery of such services may be outside of the remit of the Development Plan process, it is nonetheless important that the County Development Plan provides an appropriate policy context to facilitate their provision. The Council will continue to liaise closely with the Department of Education and Skills with regard to the requirements for educational facilities

Chief Executives Recommendations

That the Draft Plan will support the provision and expansion of educational facilities at all levels within the County to acknowledge the significant role education has in the development of the County.

No. 10: Submission from The Department of Transport, Tourism and Sport

This submission is divided into the following 6 themes:

Sustainable Mobility Policy Review

The Department of Transport, Tourism and Sport are carrying out a review of sustainable mobility policy. Details of this review are outlined in the submission. The aim is to develop a new policy framework that better supports sustainable mobility – linking more people, to more places, for more of their journeys and promoting increased use of active travel and public transport.

Investment Framework

The Department are also finalising its review of its *Strategic Investment Framework for Land Transport* to ensure consistency of approach across Government in relation to Project Ireland 2040 and will shortly launch a public consultation on a revised set of priorities to guide investment in the years ahead.

Comments on Issues Paper

The submission notes that a number of key themes and questions outlined in the Strategic Issues Paper relate to key themes of the Department’s policy review and its publication discussion paper such as integrating land use and transport planning; promoting use of active travel; and addressing climate change issues.

It is also noted that since the publication of the previous Development Plan there has been a number of important policy developments which the Department considers should be reflected in the 2022-2028 Plan. These relate to public transport in rural areas and accessible public transport.

Integrating land use and transport planning

The submission outlines the Department support of the importance of aligning land use and transport policies. The submission relays the importance of this practice and notes that links between land use and transport are recognised in *Project Ireland 2040* and the Department is working to strengthen the policy link between these areas.

Climate Change Mitigation

As part of the submission the department outline their policy to achieving a greener transport sector and specifically mentions one paper which outlines the current climate change challenges facing Ireland and the steps that are being taken in the transport sector to reduce emissions in line with climate action policies.

Public transport in rural areas and accessible public transport

It is noted that since the previous Development Plan was published there have been important policy developments which are relevant to Movement and Transportation and which DTTAS considers should be reflected in the 2022-2028 Plan. These include:

- (1) The publication by the National Transport Authority (NTA) of its “Local Link Rural Transport Programme Strategic Plan 2018-2022”. Its key priorities include the reduction of social exclusion and the integration of rural transport services with other public transport services. In addition, one of its key objectives is greater interaction/co-ordination with Local Authorities regarding the assessment of strategic transport needs and in the development of proposed transport plan for local areas.
- (2) The publication of the “Whole of Government” National Disability Inclusion Strategy (NDIS) 2017-2021 and the ratification by Ireland in 2018 of the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD).
- (3) To make public transport more accessible to people with disabilities requires a “whole journey approach” which refers to all elements that constitute a journey from start to finish. The submission notes Local Authorities as key stakeholders in this regard in the context of ensuring a universal design approach to the built environment, including footpaths, roads, pedestrian crossing points and bus stops/shelters.

The submission also states the Department can assist with appropriate text in the Development Plan regarding integrated, accessible public transport, in both rural and urban areas.

Chief Executive’s opinion on issues raised

Cavan County Council acknowledges the importance of aligning land use and transport policies in the preparation of the new draft Plan. CCC will liaise with the Department of Transport, Tourism and Sport in the preparation of the draft Plan and acknowledge the publication of

numerous new publications that will be referenced in the draft Plan. Sustainable alternatives in transport like walking and cycling will be a key aim of the draft Plan.

Chief Executives Recommendations

That the draft Development Plan includes policies and objectives that support sustainable travel in the County.

No. 11: Submission made by the Transport Infrastructure Ireland

Transport Infrastructure Ireland (TII) welcome the opportunity to make a submission. The submission is divided into the following sections:

1. Managing Exchequer Investment and Statutory Guidance

The submission outlines the main priorities of Project Ireland 2040 National Planning Framework in relation to a more compact approach to urban development and enhancing connectivity between centres of population of scale.

The submission also notes that better accessibility between the four cities and the Northern and Western region will enable unrealised potential to be activated as well as better preparing for potential impacts from Brexit. It is further noted that improving accessibility to the North-West including the upgrading access to the North-West border area, is identified for Cavan by the inclusion of the upgrading northern sections of the N3/M3 national primary route in the National Development Plan.

The submission states that TII seek to ensure that these official national objectives are promoted. It is further noted that these priorities relate to the implementation of national policy to development at national roads, associated interchanges and junctions as set out in Section 28 Spatial Planning and National Roads Guidelines for Planning Authorities.

The submission also refers to Section 28 Retail Planning Guidelines, 2012 and notes there should be a general presumption against large out-of-town retail centres in particular those located adjacent or close to existing, new or planned national roads/motorways. The submission also highlights the Council's attention is the requirements outlined in the Sustainable Rural Housing Guidelines, which indicates the importance of the protection of the national road network.

The submission details specific policy objectives included in the RSES and state that it is of particular importance that policies and objectives are included in the new development plan to allow the network of national roads to continue to play the intended strategic role in catering for inter-urban and inter-regional transport requirements. The draft plan should have regard to the provisions of national and regional policy. TII request Cavan County Council to consider including strategic objectives to reflect national and regional policy requirements in relation to spatial planning and national roads. The submission summaries the latter as:

- a) To maintain the strategic function, capacity and safety of the national roads network, and

- b) To ensure that the existing extensive transport networks, which have been greatly enhanced over the last two decades, are maintained to a high level to ensure quality levels of service, safety, accessibility and connectivity to transport users

2. Development Strategy

The submission reiterates that TII seek to ensure that the carrying capacity, operational efficiency, safety and significant national investment made in national roads in Cavan is protected and that the relevant policies/objectives included in the existing County Development Plan are continued and improved in accordance with the Spatial Planning and National Roads Guidelines for Planning Authorities (2012).

The submission states that TII supports practices aimed at concentrating development in established urban areas and designated development centres subject to development been framed within a coherent integrated land use and transportation strategy.

TII request that Cavan County Council considers the implications of land use policies on the strategic national road network in the area as a criteria in determining the future zoning strategy to be outlined in any land use plans to be contained in the Draft County Development Plan. ITT further recommends that residential, retail, and employment objectives especially zoning objectives should guide developers to design for sustainable transportation requirements. The submission also states that an integrated approach to the design of development areas should include a set of principles and criteria designed to ensure a high standard of access by public transport, foot and private car so that the variety of enterprise and employment zones/areas can be easily accessible by all modes of transport and all sections of society.

The submission also refers to the Spatial Planning and National Roads Guidelines for Planning Authorities (2012) which indicates that where planning authorities propose large scale development in urban areas and or areas adjoining national roads, including major junctions and interchanges, development plan should ensure that the capacity on national roads is utilised appropriately and that such roads can continue to perform their intended function into the future. The submission outlines how this can be achieved.

TII also advise Cavan County Council that any costs arising to the national roads network to accommodate local development proposals will be borne by the local authority.

In relation to national roads, the submission outlines land use planning interaction with recommendations to be considered in relation to the following:

- i) Areas where speed limits greater than 50kpm apply
- ii) Development at national road junctions/interchanges
- iii) Settlement Development and National Roads
- iv) Service Areas
- v) Renewable Energy

3. Transport Planning and National Road Schemes

The submission states that TII in collaboration with the Council, is developing/progressing national road schemes and improvements within County Cavan. It is noted that details of the schemes should be considered for inclusion in the Development Plan including policies and objectives to safeguard scheme planning and route options free from adverse development that could prejudice scheme delivery. The submission notes that the N3 Virginia Bypass is included as a Scheme in Pre-Appraisal/Early Planning in the National Development Plan. It is further stated that there are other national road minor improvement schemes in development that the Council may consider relevant for inclusion in the Draft Development Plan. TII recommends consultation with the Councils Road Design Office or local National Road Design Office to ensure the inclusion of up to date information in the Draft Plan, noting that the status of schemes can alter during the course of a Development Plan and development plan preparation.

ITT also state other priorities in relation to national roads are the maintenance of the existing national road network, including junctions, and safeguarding the Exchequer investment in national roads to date. It is further advised that any additional improvements relating to national roads identified at a local level should be done so in consultation with and subject to agreement of TII. It is also stated that any additional connectivity to national roads should be developed in accordance with the Spatial Planning and National Roads Guidelines for Planning Authorities (2012). TII request the inclusion of policies and objectives in the Development Plan that provide for the following:

- Objectives providing for development of relevant national road schemes
- A policy to protect national road schemes free from adverse development that may compromise the development of route options or the construction of preferred routes, or add to the overall costs associated with proposed schemes.

The submission also notes that the relative priority or timeframe for national road schemes may be subject to alternation due to funding, etc.

4. Other Specific Policies and Objectives

a. Road Safety

The submission makes reference to the Road Safety Authority's Road Safety Strategy and outlines the core components of same. The submission notes that the design of development proposals must address the functionality and safety of road needs. The submission gives details on the two processes address these design concerns: Road Safety Impact Assessment (RSIA) and Road Safety Audit (RSA). The submission further notes that the Council are requested to reference RSA and RSIA requirements in the Draft Development Plan regarding to development proposals with implications for the national road network.

b. Traffic and Transport Assessment (TTA)

TII recommend that planning applications for significant development proposals should be accompanied with TTA, which are assessed in association with their cumulative impact with other relevant developments on the road network. The submission make reference and contains links to relevant guidance documents.

ITT also request Cavan County Council to reference TII Traffic and Transport Assessment Guidelines in the Draft Plan relating to development proposals with implications for the national road network.

c.) Signage

The submission makes reference to guidelines relation to signage and refers Cavan County Council to Section 3.8 of Spatial Planning and National Roads Guidelines for Planning Authorities, which indicate a requirement to control the proliferation of non-road traffic signage on, and adjacent to national roads. TII would welcome the provision of TII policy and the DoECLG Guidelines incorporated into the new Development Plan.

d.) Noise

TII request Cavan County Council to refer to the requirements of S.I. No.140 of 2006 Environmental Noise Regulations in the Draft Plan. TII advises that development proposals identify and implement noise mitigation measures, where warranted. It is noted that the cost of implementing mitigation measures shall be borne by the developer.

e.) Safeguarding national road drainage regimes

The submission notes that TII would welcome consideration to the given to the inclusion of a new objective associated with safeguarding investment in the national road network relating to protection of national road drainage regimes. The submission notes that significant improvements to the national road network have been overseen by Cavan County Council and that there is an onus and a policy requirement on road and planning authorities to safeguard the national investment made. The submission notes that in this regard, TII has experienced a number of instances here private development proposals have accessed or sought to access national and drainage regimes to dispose of surface water drainage.

The submission further notes that national road surface water drainage regimes are constructed with the objective of disposing of national road surface water and it is important that capacity in the drainage regime is retained to address this function.

TII would welcome consideration of a new Objective included in the Development Plan outlining that: *“the capacity and efficiency of the national road network drainage regimes in County Cavan will be safeguarded for national road drainage purposes”*.

Conclusion

TII recommend that the development objectives in the Draft Development Plan reflect the provisions of the DoECLG’s Spatial Planning and National Roads Guidelines which indicates the importance of developing an evidence based approach at development plan stage for proposals with implications for the on-going safe and efficient operation of national roads. ITT advise Cavan County Council to ensure in the review of the County Development Plan:

- The protection of the safety, carrying capacity and efficiency of the existing and future national roads network is maintained,
- Future National Road Scheme planning is provided for and schemes are safeguarded, and;

- An integrated approach to land use and transportation solutions throughout the County should be undertaken such that local traffic generated by developments is catered for primarily within the framework of the local road network.

TII offer their availability to meet with Cavan County Council to further discuss the issues raised in this submission.

Chief Executive's Opinion in Issues Raised

Cavan County Council acknowledge the interdependence between transport and land use planning and will promote sustainable settlement and transport strategies in urban and rural areas including the promotion of measures to reduce anthropogenic greenhouse gas emissions and a reduction in energy demand.

The Draft Plan will support and encourage sustainable and compact forms of development which reduce the need to travel for employment and services. Development will be directed to areas that are served by public transport thus ensuring that the critical mass of population is achieved to maximise the return on public transport investment.

The Draft Plan will seek to ensure that road schemes in towns and the layout of new developments facilitate bus routes, walkways and cycle tracks to encourage a multi modal approach to travel. Large developments will be requested to submit Traffic and Transport Assessments (TTA's) and Road Safety Audits (RSA's) with planning applications to ensure that the development can be appropriately located with minimal impact on the surrounding road network.

The Draft Plan will seek to protect the carrying capacity of the national road network from inappropriate development and only in cases of demonstrable exceptional circumstances (agreed with TII) will new entrances be permitted.

The provision of off-line services will be promoted at appropriate locations in accordance with the NRA/TII Service Area Policy (2014) and in consultation with TII.

Reference will be included in the Draft Plan regarding the necessity of compliance with the Spatial Planning and National Roads Guidelines.

The Draft Plan will seek to restrict the proliferation non road related signage in the County while ensuring that there is sufficient clear well functioned signage to facilitate tourism and business development in the County.

In summary, policies and objectives within the Draft Plan will seek to support and encourage sustainable and compact forms of development which have minimal impact upon the carrying capacity, efficiency and safety of the surrounding road network. Development will be directed to areas that are well served by public transport, pedestrian and cycle facilities to reduce reliance on the private car.

Chief Executive's Recommendation

That the draft plan includes policies and objectives that support and encourage sustainable and compact forms of development which have minimal impact upon the carrying capacity, efficiency and safety of the

surrounding road network. Development will be directed to areas that are well served by public transport, pedestrian and cycle facilities to reduce reliance on the private car.

That the draft plan includes policies and objectives that protect the carrying capacity, operational efficiency, safety and significant national investment made in national roads in Cavan and that the relevant policies/objectives included in the existing County Development Plan are continued and improved in accordance with the Spatial Planning and National Roads Guidelines for Planning Authorities (2012).

That the draft plan when proposing new or extended development areas should include a set of principles and criteria to ensure a high standard of access by public transport, foot and private car so that the variety of enterprise and employment zones/areas are easily accessible by all modes of transport.

That policies and objectives are included in the draft plan that safeguard route options for proposed new or improved road schemes.

That that draft plan includes policies and objectives that require the submission of either a Road Safety Impact Assessment (RSIA), Road Safety Audit (RSA) and/or Traffic and Transport Assessment (TTA) when new or extended development proposals have implications for the national road network.

That the draft plan includes policies and objectives that ensures that the capacity and efficiency of the national road network drainage regimes in County Cavan will be safeguarded for national road drainage purposes.

No. 12: Submission from the National Transport Authority

The National Transport Authority (NTA) welcomes this opportunity to comment on the Cavan Development Plan 2022-2028 Issues Paper. The submission is divided under the following headings:

1. Guiding Principles

The National Transport Authority recommends the following policies and objectives be included in the Development Plan preparation:

- In relation to urban-generated development, it is noted that the development of lands, within or contiguous with existing urban areas should be prioritised over development in less accessible locations (particularly in the largest urban areas).
- Residential developments should be carried out sequentially using lands which are or will be most accessible by walking, cycling and public transport (including infill and brownfield sites).
- Locate larger scale, trip intensive developments such as office and retail into central locations in urban areas.
- The management of space in town centres should be used to deliver a high level of priority and permeability for walking, cycling and public transport modes. This approach would make town centres accessible, attractive, vibrant and safe, as places to work, live, shop and engage in community life.
- Planning at local level should promote walking, cycling and public transport by maximising the number of people living within walking and cycling distance of their
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neighbourhood or district centres, public transport services and other services at local level.

- New development areas should be fully permeable for walking and cycling. It is further stated that retrospective implementation of walking and cycling facilities should be undertaken where practicable in existing neighbourhoods.
- The density and location of employment development should maximise the potential for walking, cycling and public transport.
- New residential development should provide for filtered permeability while restricting or discouraging private car through trips.
- Trip destinations (employment sites, schools, retail, etc) should be developed at locations that can maximise the potential to access such developments by walking, cycling or on public transport.
- The strategic transport function of national roads should be maintained and protected in accordance with national policy.
- All non-residential developments should be subject to maximum parking standards
- It is noted that in locations where the highest intensity of development occurs, an approach that caps car parking on an area-wide basis should be applied with particular reference to the larger urban areas.
- For all major employment developments and all schools, travel plans should be conditioned as part of planning permissions and be carried out in a manner consistent with existing NTA guidance.

2. Public Transport

The submission outlines the NTA statutory responsibility in terms of public transport service provision which, with respect to Cavan, would relate to:

- A Public Service Obligation (PSO) contract between the NTA and Irish Rail;
- A PSO contract between the NTA and Bus Éireann;
- Direct award contracts for the operation of bus services; and
- The licencing of commercial bus services.

Rural Development and Rural Transport

The submission notes that the rural economy and rural social fabric should be supported through the provision of better local connectivity and connectivity to services and commercial activities located in cities and towns. It is also noted that urban-generated development in rural areas needs to be managed in such a way so as to safeguard the integrity of rural areas and to support the accommodation of urban-generated development within urban areas. The submission outlines that the NTA provide rural transport services through the *Local Link Rural Transport Programme* and outlines key objectives, its mission statement and future development and expansion programmes. It is recommended that the Development Plan acknowledges the role of rural transport services can perform in providing for social and economic connectivity between small villages/rural areas and larger towns.

3. Strategic Road Networks

The submission notes that the National Planning Framework sets out the importance of maintaining, improving and protecting the strategic function of the key transport corridors including the imperative to improve and protect the strategic function of the TEN-T core and

comprehensive network. It also states specific policy objectives and strategic outcomes. The submission recommends that to protect the strategic transport function of the national roads, including motorways that developments should be in accordance with the DOECLG *Spatial Planning and National Roads Guidelines* (2012), and reference should be made to same in the Development Plan.

4. Parking Standards

The NTA recommends that car parking provision for non-residential land uses should be stated as maximum standards rather than minimum requirements. In addition, in locations where the highest intensity of development occurs, an approach that caps car parking on an area-wide basis should be applied.

Cycle Parking

The submission notes that cycle parking, trip origins and destinations is a key factor in determining mode choice and should be appropriately designed to ensure adequate facilities are provided. The submission states that the Development Plan should therefore include specific policies on cycle parking in the urban realm and in private developments. In this regard, the NTA recommends a guidance document. Details of this guidance document is included as part of the submission.

5. National Transport Authority Guidance Documents

The NTA recommends that the preparation of the Development Plan is informed by the following NTA guidance:

- The National Cycle Manual;
- Permeability Best Practice Guide;
- Achieving Effective Workplace Travel Plans: Guidance for Local Authorities;
- Workplace Travel Plans: A guide for Implementers;
- Toolkit for School Travel;
- Guidance Note on Area Based Transport Assessment (NTA and TII).

Local Transport Planning

The submission notes that Cavan Town will be included within the County Development Plan, a Local Transport Plan may be produced and it is noted that this should be guided by the NTA/NII document *Area Based Transport Assessment*. The submission further notes that in the context of the requirement of land use and transport planning to plan and provide for sustainable travel options in the town.

Development Plan Indicators – Mode Share

The submission recommends the Development Plan includes sustainable transport indicators, including mode share, for the purpose of monitoring the efficacy of policies and development objectives against a range of sustainable development indicators.

Chief Executive's Opinion on Issues Raised

The comments and recommendations made in this submission are noted and will be considered during the preparation of the Draft Plan.

It is acknowledged that an integrated approach needs to be taken to land use and transportation in the Draft Plan to promote compact mixed use settlements and to reduce the need to travel. Growth will be targeted towards centres served by high quality public transport to maximise the investment made.

Although the Council is not a public transport provider, it has an important role to play in accommodating public transport within the County. The need to improve public transport services in rural areas is accepted and will be explored in the preparation of the Draft Plan. The Council will liaise with bodies such as the NTA and public transport service providers to identify future transport routes and ensure their reservation.

The need to facilitate and support cycling and walking to increase modal share and public health and well being is recognised and it is intended to build upon the significant number of sustainable transport projects which have been delivered over the life of the current plan. Existing principles and policies will be reviewed during the preparation of the Draft Plan and should continue to support and promote walking and cycling and require good connectivity between settlements and destination and at the local level within the County. It is intended that the Draft Plan will support the creation of sustainable communities into the future which provide for all modes of transport in a safe and user friendly form.

The Council is supportive of the delivery of key pieces of infrastructure required including specifically the Virginia bypass. It is intended that policies and objectives supporting these projects will be included in the Draft Plan. The requirements for bypass projects will be examined as part of the review process.

The mandatory objectives for Development Plan include objectives for the promotion of sustainable settlement and transportation strategies in urban and rural areas including the promotion of measures to address the necessity of adaptation to climate change. Consequently, the Draft Plan will have a strong focus on climate change.

Chief Executive's Recommendation

Climate Change comprises of a central cross-cutting theme which will permeate all aspects of the Draft Plan. The Draft Plan will include objectives and policies to address climate change and promote sustainable settlement and transportation strategies, including measures to reduce energy demand and reduce transport emissions.

The Draft Plan will continue to support land use patterns which reduce the need to travel by car. To achieve emission reductions and in line with international best practice, a policy of higher residential densities in urban areas close to public transport links will be considered.

No. 13: Submission from Irish Water (IW)

Irish Water welcome the opportunity to comment on the Issues Paper for the Cavan County Development Plan 2022-2028. Provided in the submission are observations and suggested text

and objectives for inclusion in the draft plan. It is noted that Irish Water will continue to engage with the planning department as the development plan process progresses. The submission is divided into the following headings:

Background

The submission notes that Irish Water (IW) is responsible for the provision of public water supply, wastewater collection and treatment services. It is an objective of IW to provide both drinking water and wastewater capacity to facilitate growth in accordance with core strategies at county level, and with national and regional planning policies and objectives. The submission states that Cavan County Council retains its role in facilitating the provision of adequate water services, in conjunction with IW, at local level, via Service Level Agreements.

National and Regional Policy

The submission acknowledges the planning policy and direction as provided in the National Planning Framework and the Northern and Western Regional Spatial and Economic Strategy and states that IW are committed to supporting these policies, subject to budgetary and environmental constraints. Attention is drawn to Section 8.5 of the RSES which provides general policy direction in relation to the sustainable management of water supply and wastewater needs.

Water Services Strategic Plan

The submission outlines the role the plan and its timeline. It is noted the first review is currently underway and that IW and Cavan County Council will continue to work together to identify the water services required to support planned development in line with national and regional policies for inclusion in Irish Water Capital Investment Plans.

Capital Investment Plan 2020-2024

The submission the core function of this plan and notes that work has commenced internally in IW to align this plan with Irish Water's Strategic Funding Plan and programmes. It is further noted that IW will keep Cavan County Council informed of this process.

Zoning

The submission states that IW is available to assist Cavan County Council in identifying suitable zoned lands from a water services perspective. The submission also notes that to maximise the use of existing water services, IW encourages sequential development in areas with existing water services infrastructure and space capacity.

Sustainable Drainage and Green Infrastructure

The submission states that IW encourages the inclusion of policies and objectives on the use of Sustainable Urban Drainage Systems and Green Infrastructure in new developments and retrofitted in existing developed areas. The submission notes the benefits of such systems.

Climate Change

The submission reiterates IWs focus on addressing the impacts of climate change by adapting assets to be resilient to climate change and mitigate climate impact by reducing carbon footprint. It is stated in the submission that IW are preparing a strategy to respond to global and national

climate change legislation and policy frameworks for climate change action and fulfils the requirements of Irish Water's relevant plans and statements. The submission notes that IW is happy to work with Cavan County Council to ensure the overarching goals of mitigating against, and adopting to, climate change in relation to water and wastewater are achieved.

The Natural Water Resources Plan

The submission outlines the aim objectives and this plan to achieve a sustainable, secure and reliable public drinking water supply over the next 25 years. The submission notes that this plan will also outline the longer term plan for the Cavan area and is due to be published for public consultation later this year.

Drinking Water Source Protection

The submission states that IW has adopted the World Health Organisation Water Safety Plan approach and outlines key elements of this approach. IW's commitment to working with public bodies and other stakeholders towards a common goal of the protection of drinking water sources is outlined in the submission.

River Basin Management Plan

It is stated in the submission that IW support the implementation of River Basin Management Plans. This submission also outlines how IW are working collaboratively with other state bodies and how such policies have been incorporated into IW investment plans and work programmes.

Connections and Developer Services

The submission notes that new connections to IW networks are subject to a connection charging policy. It is also noted that if a diversion or alternation of IW assets is required as part of a proposed development that a diversion agreement may be required. The submission provides links for further information.

Wastewater Infrastructure

Wastewater Treatment Plants

The submission explains that IW recently issued the wastewater treatment capacity register for Cavan which outlines the capacity available for all settlements with a public WWTP within your local authority area. It is noted that capital investment projects are ongoing at Bailieborough, Ballyjamesduff, Kingscourt, Cootehill and Virginia which will provide growth capacity. Work which is ongoing at a number of smaller WWTPs is also mentioned.

The submission also notes that further upgrades may also be progressed under the IW's Small Towns and Villages Growth Programme which is intended to provide growth capacity in smaller settlements which would not otherwise be provided for in the current Investment Plan. The submission states that consultation with local authorities to identify and plan for appropriate programmes is ongoing, it is expected that final decisions on investments will be made under this programme on a staggered basis from Q1 2021 on.

Wastewater Networks

The submission states that IW and Cavan County Council are continually progressing sewer rehabilitation activities, capital maintenance activities, etc. and that IW and CCC will continue to monitor the performance of the networks to ensure that the most urgent works are prioritised.

The submission also notes that a Network Development Plan is currently being prepared for Cavan town, which will help inform how zoned sites within the town could be serviced. It is also noted that there are network constraints in Kingscourt and Ballinagh and that further investigation and potentially upgrade works would be required to facilitate new developments. The submission also makes reference to the fact that as part of the Virginia WWTP upgrade project, works will be carried out at Lake Road pumping station to resolve constraints that currently impact the agglomeration. It is further noted that this project is due to commence in 2022 and there are no known major constraints in the other settlements in the county.

Water Infrastructure

Water Supply for Cavan

The submission notes that County Cavan is supplied by 16 water resource zones and assessments have shown that the following water resource zones may require further investigative studies or interventions to facilitate significant new connections to the network: Arvagh PWS, Blacklion PWS, Dowra PWS, Gowra PWS, Killeshandra PWS, Shercock PWS, Ballyhaise PWS, Ballyconnell PWS, Ballyjamesduff RWSS, Cavan RWSS, Bailieborough RWSS and Cootehill PWS.

It is also noted that it is unlikely that there will be any issues facilitating new connections in the remaining WRZs, although further investigative studies may be required in some instances. The submission also lists the seven Cavan water resource zones that are supplied by neighbouring group water schemes (Arvagh PWS, Blacklion PWS, Dowra PWS, Gowra, Killeshandra PWS, Shercock PWS, Ballyhaise PWS).

It is also stated that the full options assessment stage of the NWRP is currently progressing in consultation with Cavan County Council. This is to identify the preferred interim and long-term interventions required to ensure a sustainable water supply in Cavan, and nationally.

Water Networks

This submission notes that IW and CCC are continually progressing leakage reduction activities, mains rehabilitation activities and capital maintenance activities. It is also noted that IW and CCC will continue to monitor the performance of the networks to ensure that the most urgent works are prioritised. The submission also references mains rehabilitation works carried out on distribution and trunk mains throughout the county, including Cavan town, Blacklion, Swanlinbar and Cootehill. It is also noted that there are no known major water network constraints across the settlements in Cavan.

Suggested policies/objectives

The submission contains the following policies and objectives which IW suggest CCC should include in the County Development Plan in relation to projecting IW assets and the environment.

General Policies in relation to Water Services

- a) To work closely with Irish Water to identify and facilitate the timely delivery of the water services required to realise the development objectives of this plan;

- b) To consult with Irish Water in the development of Plans, SDZs and so forth to ensure the proposed spatial strategy takes account of:
 - the available capacity of the public water service infrastructure;
 - the need to protect and optimise existing and planned public water service infrastructure;
 - the need for sequential and phased development;
 - the financial and environmental implications of development in sensitive areas.
- c) Prior to granting planning permission the Council will ensure that adequate water services will be available to service development and that existing water services are not negatively impacted. The Council should require developers to provide evidence of consultation with Irish Water prior to applying for planning permission;
- d) To protect existing wayleaves and buffer zones around public water services infrastructure through appropriate zoning and to facilitate the provision of appropriate sites for required water services infrastructure as necessary;

Water Supply

- e) To protect both ground and surface water resources including taking account of the impacts of climate change, and to support Irish Water in the development and implementation of Drinking Water Safety Plans and the National Water Resources Plan;
- f) To promote water conservation and demand management measures among all water users, and to support Irish Water in implementing water conservation measures such as leakage reduction and network improvements.

Wastewater Services

- g) To ensure that the Local Authority provides adequate storm water infrastructure to accommodate the planned levels of growth within the plan area and to ensure that appropriate flood management measures are implemented to protect property and infrastructure;
- h) To require all new developments to provide a separate foul and surface water drainage system and to incorporate sustainable urban drainage systems where appropriate in new development and the public realm;
- i) To prohibit the discharge of additional surface water to combined (foul and surface water) sewers to maximise the capacity of existing collection systems for foul water;
- j) To support Irish Water in the promotion of effective management of trade discharges to sewers to maximise the capacity of existing sewer networks and minimise detrimental impacts on sewage treatment works;
- k) To ensure that all new developments connect to the public wastewater infrastructure, where available, and to encourage existing developments that are in close proximity to a public sewer to connect to that sewer. These will be subject to a connection agreement with Irish Water;
- l) To refuse residential development that requires the provision of private waste water treatment facilities (i.e. Developer Provided Infrastructure), other than single house systems;
- m) The provision of single house septic tanks and treatment plants in the Plan area will be strongly discouraged to minimise the risks of groundwater pollution. Where such facilities are permitted, full compliance with the prevailing regulations and standards, including the EPA's Code of Practice Wastewater Treatment and Disposal Systems Serving Single Homes (PE.<10) (EPA 2009), as may be amended, will be required;

- n) To ensure that private wastewater treatment facilities, where permitted, are operated in compliance with their wastewater discharge license to protect water quality.

The submission contains the following Note: As per Section 5.3 of the Draft Water Services Guidelines for Planning Authorities, *“Alternative solutions such as private wells or waste water treatment plants should not generally be considered by planning authorities. Irish Water will not retrospectively take over responsibility for developer provided treatment facilities or associated networks, unless agreed in advance”*. The opportunity may arise for the development to connect into the network in the future however, the developer provided treatment facility would not be taken over.

Chief Executive’s opinion on issues raised

Cavan County Council will continue to liaise with Irish Water in regard to the availability of services within settlements in Cavan and any future projects to be included in the Water Services Strategic Plan throughout the plan review process.

Chief Executives Recommendations

That Cavan County Councils liaises with Irish Water regarding the availability of water and wastewater treatment facilities in the settlements of County Cavan.

No. 14: Submission from Failte Ireland

This submission seeks to ensure a meaningful framework is established for the enhancement of tourism in the County and the wider region and deals with all aspects of tourism- from strategic planning to visitor experience and destination management. The eastern side of Cavan is particularly rich in heritage and cultural experiences and has key assets like Castle Saunderson and Cavan County Museum. The Irelands Ancient East brand offers this area the best opportunity to grow its economic return from tourism. The western part of the County with its proximity to the Shannon fits the new Ireland’s Hidden Heartlands brand.

Failte Irelands main objective in working towards a sustainable tourism sector is to protect, enhance and promote both our natural and built heritage for the common benefits of visitor, industry, community and the environment.

Failte Ireland requests that the new plan includes a dedicated tourism chapter or strategy to enable decision makers and stakeholders to follow guidance in relation to tourism amenities and assets. This could build on the actions and objectives set out in the Cavan Tourism Development Plan 2017-2022 and recognise the significant role that tourism plays in the overall operation and development of the County. Tourism policies and objectives should be clearly set out through the inclusion of maps in the development plan to include the county’s strategic tourism locations, transport routes, scenic routes and views, tourism attractions and facilities and transportation hubs.

Failte Ireland request that the development plan protects and promotes the key assets of the county which include

- Cavan County Museum
- Ramor Theatre
- Castle Saunderson
- Cavan Burren Park
- Dun an Ri Forest Park
- Killykeen
- River Shannon
- St. Killians Heritage Centre
- Drumlane Abbey

Failte Ireland has placed significant investment in key tourism assets with the brand initiative 'Irelands Hidden Heartlands' including Beara Breifne Way, Cavan Town as a destination town and the Shannon Masterplan.

'Irelands Ancient East' encompasses the rich heritage and cultural assets that Ireland has to offer.

Both the Irelands Hidden Heartlands and Irelands Ancient East identification and branding should be fully integrated into the development plan.

Bearna Breifne Way-this is a long distance walking route- it has 12 stages from Cork to Cavan and more than 40,000 people have walked its path. Failte Ireland request that an objective to safeguard its future success in the new plan and this should relate to key issues such as promoting key facilities and services for visitors such as accommodation, signage, parking and sustainable transport.

- The Shannon Masterplan- Waterways Ireland is leading the preparation of the Shannon Masterplan with a key objective to revitalise the combined Shannon Navigation and Shannon Erne Waterway as a key destination in Irelands Hidden Heartlands. Failte Ireland requests the inclusion of an objective recognising and supporting the forthcoming Master plan.
- Cavan Destination Town – in 2019 funding was allocated to Cavan Town through CCC as part of the €15.5 million 'Destination Towns' initiative launched by Failte Ireland. This will boost the attractiveness and tourism appeal of towns nationwide.
- Ancient Destination Development Plan – this is a 5 year destination development plan.
- Failte Ireland is developing a cluster of businesses (attractions, activities, accommodation, food, arts, crafts, culture etc) in Virginia, Mullagh and Ballyjamesduff areas of East Cavan. Failte Ireland request an objective to safeguard and support this planned investment in the new development plan.
- Failte Ireland has published 'development Guidelines for Tourism Destination Towns' to provide a framework to support communities and Local Authorities and set out key drivers of what makes a town appealing. They aim to enhance public spaces such as squares, streetscapes and markets in a way that will engage tourists and enhance their experience. This can include spaces for food and craft markets, areas for town centre events, public art displays as well as orientation and signage to help visitor explore a

towns local heritage. Connectivity which promotes walking and cycling facilities linked to historic town trails, blueways etc. should be developed.

- More creative reimagining of public space and the public realm of our cities and towns will be key to short term recovery post Covid 19 and will drive longer term attractiveness. The vitality and vibrancy of a town is crucial in making it more attractive. Tourism initiatives can act as a stimulus attracting further investment with improved public realms and reuse of vacant buildings. The Heritage Council 'Town Centre Check Programme' is a good example of a programme used to raise awareness, understanding and appreciation of the critical role of historic town centres.
- Greenways are key tourism infrastructure and appeal to travel market, support rural development, job creation and protect and promote natural assets and biodiversity. Key considerations include consideration of linkages to towns, villages and communities. Initiatives such as Cavan Leitrim Greenway, Cavan Railway Greenways and the Navan to Kingscourt route.
- Leveraging our heritage assets can lead to economic, social and cultural benefits for local communities. In 2017 over 90% of overseas holidaymakers visited a heritage site in Ireland as part of their holiday. Heritage is an intrinsic element and its economic value cannot be separated from overall value of overseas tourism. The formulation of policies that acknowledge and support the positive role heritage plays with tourism benefits tourism and heritage.
- Since 2017, Failte Ireland has established Strategic Partnerships with 4 state agencies – NPWS, Coillte, OPW and Waterways Ireland to optimise the visitor experience of state owned lands and assets such as national parks, nature reserves, forest parks and heritage site. Achieving access to these sites needs to be done in a sustainable manner.
- There is a fundamental line between tourism and many other sectors which needs to be acknowledged in the draft plan which should result in an increased level of policy cross-compliance and consideration of potential benefits and impacts on tourism in the development of policy.
- Tourism can make a key contribution to rural economies and communities and should be promoted and safeguarded in the plan. The VICE model should be identified in the plan which identifies sustainable tourism as the interaction between visitors, the industry, the community and their collective impact on and response to the Environment where it all takes place.
- We can better line tourism attractions to towns and villages so they gain economic benefit by
 - Encouraging participation in Local Expert Program
 - Centralised parking/bicycle access/motorhome parking
 - Improved or extended opening hours for publicly owned attractions
 - Improved directional signage
 - Access to public toilets, improved orientation and storytelling in towns modelled on Destination Towns Guidelines
- The development plan can protect and develop angling in the county by ensuring that it seeks not only to protect the water resources in the county, but also enhance them. It has the potential to provide economic growth especially in rural areas and provide overseas and indigenous anglers with a deep and enriching experience. Continued engagement and collaboration with all relevant stakeholders is needed.
- The development plan should contain a chapter and map on tourism illustrating

- Key nodes of tourism activity including a list of key assets
- Existing transport links between nodes and identified trails
- Strategic tourism centres where key services like hostels etc are located
- Sensitive environments where provision of services must be sensitive and appropriate to the robustness/sensitivity of the receiving environment
- Areas of unrealised tourism potential where protective policies will aim to encourage development of this sector
- Branding – reference and use of Failte Irelands Tourism Brand logos applicable to the county
- Sustainable travel between sites
- Areas of unrealised tourism potential where proactive policies to encourage the development of this sector.

Failte Ireland requests that the Council develop a dedicated Renewable Energy Strategy and this should include a map which identifies areas suitable and unsuitable for the siting of wind turbines and sensitive areas such as tourism facilities or assets. Robust policies will assist in ensuring a continued emphasis on the positive interactions between both the energy and tourism potential of the county.

Chief Executive’s opinion on issues raised

The issues raised in relation to the importance of Tourism in Cavan are noted. CCC recognise the economic and social benefits of Tourism in Co. Cavan. The draft plan will recognise the importance of key tourist destinations and activities in the County, will continue to encourage the delivery of sustainable transport like Greenways and Blueways etc. and express its assets in the Failte Irelands ‘Irelands Ancient East’ and ‘Irelands Hidden Heartlands’ brands.

The draft development plan will include sections on both natural and built heritage and ensure its protection, so that it can continue to support tourism into the future.

Town centre revitalisation will be a key theme of the draft plan and proposals for public realm and redevelopment will be actively encouraged in the draft plan.

Chief Executives Recommendation

That the draft plan includes policies and objectives that support the growth of sustainable tourism in County Cavan.

That the draft plan recognises and protects the economic benefits of sustainable tourism in the county

That the draft plan protects locations and sites in the county that attract tourism.

That the draft Development Plan includes policies and objectives that support sustainable travel in the County.

No. 15: Submission from the Health Service Executive

THE HSE is making the submissions under the remit of Healthy Ireland.

The National Climate Action plan 2016 - This recognises that Ireland must significantly step up to its commitments to tackle climate disruption. To confront this will require society change, dedicated resources and policies by CCC.

- The key aims of the CCC Climate Change Adaptation Strategy 2019-2024 should be integrated into the development plan.
- CCC need to take leadership role in influencing and promoting behaviour change and use the development plan for greater use of sustainable transport such as walking, cycling and public transport and restricting development in areas at risk of flooding and protecting natural landscape and biodiversity. CCC should set targets for greenhouse gas reduction and outline achievable actions to combat, reduce or eliminate emissions of greenhouse gases.
- CCC should ensure that climate considerations are fully integrated into planning of new projects and their design, with new proposals having a green procurement approach incorporating carbon pricing and climate criteria into decision making. Building types minimising energy, the use of low carbon materials, increased SUDS, green infrastructure, water recycling and conservation, green roofs, PV or rainwater harvesting and integration and utilisation of open space should be incorporated into design stage of any development. All developments should document their climate action and energy proposals at the planning stage.
- CCC should carry out a carbon audit of its existing building stock and retrofit with more insulated building fabric and sustainable technologies.
- Dedicated funding should be provided to invest in upgrading BER ratings.
- The creation of remote working hubs in rural towns and villages should be a priority to reduce the need to commute to and from work. All new developments should have open access fibre connections

The development plan should

- Promote and facilitate the incorporation of energy efficient design into projects
- Develop and implement an energy management programme for all public buildings
- Develop new skill sets such as green procurement, carbon accounting, carbon management and energy management.
- Support and promote the Better Energy Communities Scheme to enable communities develop new and innovative, locally based solutions to energy poverty.
- A Renewable Energy Strategy should be prepared to investigate the potential for further renewable energy production in Cavan with solar, hydropower, biomass and geothermal energy all explored.

Transport

- It should be a key aim of the development plan to implement sustainable transport patterns
- CCC should identify small scale projects that achieve significant gains e.g. segregated pedestrian and cycle paths to industrial estates/workplaces to towns and residential

areas to schools, local neighbourhood centres and public transport stops and cycle linkages between urban centres

- CCC should investigate how much traffic is due to local traffic undertaking journeys under 2k and allocate a budget to safe, well lit footpaths and cycle lanes. Active travel should be promoted.
- A quality audit should be carried out of existing pedestrian and cycle facilities in towns and villages with permeability and shorter connectivity route options for pedestrians explored. The greening of these routes would make them more attractive and increase biodiversity and add drainage capacity.
- A programme of works should be drawn up on a needs basis to ensure works that improve connectivity obtain funding.
- CCC should consider proposals for enhance bus lane provision, more park and ride facilities and infrastructure improvements to provide shelter and real time travel information. An audit of bus infrastructure and priority list of improvements based on defects. The Rural Transport Scheme is of vital importance to Cavan given the age profile and sparsely distributed population.

Smarter Travel Policy

- The development plan should set target for new residential and mixed use to take place on brownfield/existing sites- the NPF specifies that 30% of new housing to be delivered on infill/brownfield sites
- Specify maximum permitted level of parking for commercial sites which have public transport and within walking/cycling distance to amenities
- Set general restriction on future development of out of town retail centres and parking charges to be introduced
- Developments of a certain scale to implement viable travel plans which promote public transport and active travel.
- Establish e working centres to promote closer working to home
- Set target that schools in Cavan have a school travel plan to encourage students take alternatives to car.
- Provide facilities for secure bike parking and changing/showering facilities
- Reprioritise traffic signals to favour pedestrians
- Create level crossings for pedestrians across junctions
- Widen footpaths and improve surface quality
- Ensure State owned lands such as canal towpaths, former rail lines, Coillte estates etc are available for walking/cycling
- Support initiatives to establish car club schemes
- Establish park and ride facilities along major public transport nodes

National Cycle Policy Framework

There is a need to improve safety of cycling in County Cavan, the development plan should:

- Implement measures to reduce volumes of through traffic in town centres.
- Introduce traffic calming measures/enforce low traffic speeds in urban areas and make junctions safe for cyclists.
- Support provision of dedicated signed rural cycling routes building on Failte Irelands Strategy to Develop Irish Cycling Tourism.

- Segregate cycle paths if possible and ensure they are well maintained, well lit and signposted.
- Provide secure cycling parking at all destinations and integrate cycling and public transport.

Get Ireland Active – National Physical Activity Plan for Ireland

- The key aim is to compile a directory of publicly accessible sports/recreational and amenity facilities and the development plan should aim to meet this. All new facilities should be added to this directory.
- Increase active school flag to at least 20 schools in the county.
- Develop and establish processes to enable consultation with children and young people in the development and implementation of programmes which they are involved – like playgrounds, activity centres and public spaces.
- All plans and development for Nursing Homes and Residential Care Facilities should include proposals for gardens and recreational activities.
- Opportunities for physical activity in the development of the built environment
- Promote cycling and walking.
- Develop local and regional parks and recreational spaces.
- Prioritise walking and cycling and recreational and physical activity infrastructure.
- Explore opportunities to maximise physical activity and recreation amenities.
- Provide a framework for workplace health and wellbeing.
- Smarter travel workplace initiative to be protected.
- Ensure planning provides recreational facilities for staff in industrial estates and ensures connectivity of work and recreational activities.
- Support and develop 20 new walking groups through funding of signage, upgrade of paths and lighting and resolving safety issues.
- Develop framework for programmes to increase physical activity levels.

Employment

- Planning of large scale employment sites should consider travel plans, strong cycle and pedestrian links to towns centres and to parks, recreational facilities. Ensure secure bike parking and shower facilities for staff, and to promote physical activity for staff.

Housing and Urban Design

- Housing has been identified as a priority in the National Development Plan. The governments policy to promote ‘compact and sustainable growth’ should be an objective of the development plan and CCC should include an objective to provide attractive, interesting and well used public realm and open spaces and create pedestrian centred quality environment. Cavan could implement ‘20 minute neighbourhoods’ in larger urban conurbations.
- Residential developments should include a variety of house types to create a range of lifestyle affordability and lifespan choices and include a Design Statement.

Rejuvenating Irelands Small Town Centres

- Innovative ideas to rejuvenate small towns and villages must be developed - this could include improved broadband connectivity, public transport links and facilities, cycle lanes,

bike parking facilities, public realm and streetscapes, improved marketing and placemaking, promote destination shopping, tackle vacant units and increase housing in town/village main streets.

Green Infrastructure and Biodiversity

- Ensure there is provision of quality, recreational green space to encourage more people to live in urban environments. Green Infrastructure should be implemented into the design at planning stage and benefits for health gain explored. The following should be considered when planning parks/recreational areas:
 - Green biodiverse spaces designed so within walkable distance from people's homes.
 - Green spaces co-designed with communities and reflect local needs.
 - Areas to be as large as possible, relatively open but grass not all same length with scattered trees or clumps.
 - Paths/recreational area/paths to relax and engage with nature to be incorporated from start.
 - Exercise area/trails and paths need to provide maximum contact with green space.
 - Incorporate wild areas - perhaps further away from paths.
 - Biodiversity areas designed to accommodate playgrounds and other amenity areas.
 - Biodiversity to be brought into the planning decision making process. Biodiversity Action Plan to be developed which aims to conserve and restore biodiversity and ecosystem services in the wider countryside.

Older People

- The proportion of elderly population is increasing and the development plan will need to cater for the housing needs of the elderly. Suitable housing is a key aim in National Positive Ageing Strategy and a strategic aim for Cavan should be to:
- Carry out an assessment on housing need and provision and consider housing options like social housing, sheltered housing, retirement villages and not just nursing homes.
- All residential development to incorporate 'Universal Design' principle.
- Provide accessible, affordable and flexible transport system.

Social Inclusion

The aim of the development plan should be to:

- Improve community inclusion of people with disabilities.
- Greater connectivity between generic community based services and disability specific organisation.
- Meet housing and accommodation needs of people with disabilities.
- Ensure a certain portion of housing for people with disabilities.
- Support people with disabilities to live in their own home, access employment, education and community services.
- Provide alcohol free venues for young people.

Tobacco

Aim in the development plan should be to

- Implementing tobacco free playgrounds and environments, parks, beaches and public campuses and grounds.

Food

- CCC can influence the built environment to improve health and reduce the extent to which it promotes obesity. An assessment of food outlets in town and villages should be carried out to ensure choices of health food options are available.
- Support community based initiatives to support healthy lifestyles and prevent obesity in children and adults.
- Promote through planning and built environment the benefits of healthy eating, physical activity and non sedentary behaviours.
- Improve availability and access to healthier food choices.
- Support opportunities for increasing physical activity levels.
- Facilitate community gardens and allotments.

Waste

- The plan should implement the Waste Hierarchy set out in the Waste Framework Directive and place prevention and minimisation at the forefront of any waste policy.
- Reduce disposal of municipal waste to landfill.
- Implement waste prevention measures.
- Include community waste prevention demonstration programme.
- Use easily accessible public recycling bins.
- Reuse Policy.

Water

- Strategic aim of CCC to ensure provision of safe secure drinking water and reduce waste and over use of water.

Environmental Noise

- Noise is a cause of ill health and detrimental effect on health and well being.
- A Noise Impact Assessment should be carried out for proposals with potential to give rise to significant noise like roads, railways, airports, industry, recreational activities.

Air Quality

- Plan should aim to reduce polluting emissions into air by participating and facilitating national programmes for air quality, working to develop and promote Air Quality Index for Health and develop Local Air Quality Management Plans to identify pollution 'hot spots'.

Implementation

- Efficient implementation of the plan into clear and effective actions are of upmost importance and strongly recommended that progress is constantly measured. A measure of performance indicators should establish how progress is quantified and measured.

Chief Executive's opinion on issues raised

The Council notes all of the above aforementioned issues submitted and given the wide range, it is considered that many of the issues will be considered throughout the draft Development Plan. The draft Plan will seek to promote compact mixed use settlements and reduce the need to travel. The draft Plan aims to support and promote cycling and walking in the draft Plan and will include a number of sustainable transport policies and objectives.

The draft Plan will aim to support the development of sustainable communities into the future, to provide safe and user friendly transport, support compact communities and assist in the achievement of healthier population, reductions in pollution and promotion of recreation into the future.

Chief Executive's Recommendation

That the draft County Development Plan includes as per the Planning and Development Act promotion of the need to address the necessity of adaptation to climate change and supportive policies and objectives for the delivery of sustainable energy.

That the draft plan considers sustainable transport modes like walking, cycling and public transport in the location and siting of new economic and residential lands. That land use and transport planning are incorporated appropriately within new and existing developments.

That open spaces, public space, parks, greens, employment locations etc. consider the need for physical activity for all age categories.

That the draft plan includes policies and objectives of social inclusion and older people.

That the health of the people of Cavan is considered in planning and rejuvenating the towns and villages of the County with a special regard to healthy eating outlets, tobacco, outdoor areas etc.

That noise and air quality are considered in the assessment of planning applications under the development management process.

No. 16: Submission from Inland Fisheries Ireland

Inland Fisheries Ireland is a Statutory Body whose principal function is the protection, management and conservation of the inland fisheries resource, with protection of aquatic environment and habitat a vitally important element. The submission states that issues of water quality, fisheries habitat and angling tourism should be given priority in the development plan.

They have the following comments to make regarding section of the Strategic Issues Paper

Climate Change

Impacts include increased temperatures, changes in rainfall patterns drought and unpredictable weather all which have a negative impact on fish and aquatic habitat. The development plan is an opportunity to promote policies and awareness of water conservation. Water conservation are central elements to enhance water supply reliability, restore ecosystems and respond to climate change and changing demographics. Best practice should be promoted in all

developments through methods such as rain water harvesting. Unregulated water abstraction during summer months can have significant ecological impacts for aquatic habitats, fish stocks and the ecological status of watercourses in terms of the Water Framework Directive.

Transport and Infrastructure

Provision of transport and infrastructure should be planned and constructed in a way to protect and conserve the existing environment. Potential negative impacts include impeding passage of fish and other fauna and poor water quality. Water and Wastewater Treatment facilities must have sufficient capacity to adequately treat the wastewater and water so that the ecological integrity of the receiving waters are protected.

Natural and Built Heritage

A policy in relation to aquatic habitat protection should be included in the plan and impacts of development can be destruction of instream habitats, interference with fish spawning and nursery areas, obstruction of fish passage, removal of angling pools, changes in flow regimes etc. It is essential that areas adjacent to waterways are managed in a manner that lessens the impacts on these habitats. Protection can require riparian/buffer zones of up to 50m. IFI urge the local authority to address the need for riparian habitat protection and contact IFI in relation to any development that could impact on aquatic ecosystems. Policies should be included to ensure that developments do not lead to spread of invasive species.

Tourism and Arts

IFI's 'National Strategy for Angling Development (NSAD) 2015-2020' is a framework for development of our angling resource. It aims to deliver a wide ranging set of investment, innovations and promotions to ensure our fish stocks and angling infrastructure are protected and enhanced. IFI supports the protection and development of angling tourism in the plan and the adoption of policies with regard to the provision of facilities which encourages angling, promotion of angling tourism, signposting of rivers, lakes and streams.

Environment

The Plan must protect water quality and physical environment, hydrological processes and biodiversity. The WFD requires the protection of the ecological status of river catchments and the establishment of a framework that prevents further deterioration and protects and enhances the status of aquatic ecosystems. To protect the aquatic environment the following should be considered for inclusion in the plan;

- River Corridor Management areas
- Special Preservation Orders
- Special Amenity Areas

Watercourses could be assessed in relation to aesthetic, amenity and recreational value, potential for improvement, and requirements to achieve this potential. The IFI requests that the Plan provides for the maintenance and preservation of watercourses and associated riparian habitats.

The development plan should be

- Consistent with River Basin Management Plan and comply with WFD.

- Include policies which preclude developments in areas where wastewater treatment facilities do not exist.
- Advocate for a change in acceptance of river corridor interference to an assumption against it.
- Promote the integration and improvement of natural watercourses in urban renewal and development proposals.
- Include provision for consultation with IFI on developments which may impact on aquatic environment.

Chief Executive's opinion on issues raised

The issues raised in relation to the need for maintenance of water quality and management of surface water run-off into rivers and streams are noted. The Council will work with all relevant stakeholders to protect water quality and the draft Plan policies and objectives will address this matter.

The threat of invasive species is noted in the existing Plan and the draft Plan will consider same in conjunction with the Biodiversity Plan. These species constitute a significant threat throughout the County.

Chief Executive's Recommendation

That policies and objectives are included in the draft Development Plan for the maintenance of water quality and management of surface water run-off into rivers and streams

That policies and objectives are included in the draft Development Plan for the minimisation of invasive species in the County.

That the draft plan will facilitate the provision of high quality water supply and wastewater infrastructure adequate to serve the short, medium and long term needs of the County working in conjunction with Irish Water.

That the draft plan will strive to achieve to achieve 'good status' in all waterbodies in compliance with the Waste Framework Directive, the River Basin Management Plan and associated Programme of Measure and to cooperate with the development and implementation of the National River Basin Management Plan 2017-2021.

No. 17: Submission from Leitrim County Council

Leitrim County Council welcome the opportunity to make a submission to the pre-draft consultation phase of the preparation of the Cavan County Development Plan 2022-2028 noting that Leitrim County Council is also at the same stage in preparing a new county development plan for the period 2022-2028. The submission notes there are particular projects which require and integrated approach by both Cavan County Council and Leitrim County Council, i.e. to develop green infrastructure projects and other areas of mutual concern.

The submission gives an overview of the development of the Sligo Leitrim Northern Counties Rail line as a greenway, emphasising its importance. Leitrim County Council requests that a suitably worded objective be included in the draft Cavan County Development Plan 2022-2028 to realise the delivery of this greenway within the life of the plan.

The submission also makes reference to Objective 26 of the current Leitrim County Development Plan which relates to the construction of a walking/cycle way from Dromod to Mohill and Ballinamore and Ballinamore towards Belturbet and notes work completed to date jointly by Cavan County Council and Leitrim County Council. Leitrim County Council request that a suitably worded objective be included in the draft plan to realise the progressing of this project through the statutory consent process and towards delivery within the life of the plan.

The submission contains details of the N16 national primary road and upgrading proposals, noting it as an important strategic connection between Sligo-Enniskillen-Belfast. The submission also notes that the RSES for the Northern and Western Regional Assembly identifies the N16/A4 route as a key strategic cross border transport corridor. Reference is also made to RPO 6.8 which states that the delivery of the following projects (which includes the N16 Sligo to Blacklion) shall be pursued (in consultation with and subject to the agreement of TII). Leitrim County Council requests that Cavan County Council include the progressing of RPO 16 as an objective within the Draft Plan.

The submission notes that Dowra is identified in the existing Leitrim County Development Plan settlement hierarchy as a Tier 4 Village and as a Tier 6 Small Village in the existing Cavan County Development Plan. The submission states that regard to Tier 4 Villages and the countryside, no specific lands are zoned for housing in the existing Leitrim County Development Plan and this is unlikely to change in the new plan. The submission also notes it is an objective of the existing Leitrim County Development Plan to support the work of Waterways Ireland in extending and promoting the extension of the Shannon towards Dowra. It is also noted that Roosky (located on the Shannon waterway and Blueway), is strategically located to capitalise on water-based tourism and transport and Leitrim County Council would support policies and objectives to further develop these roles.

The submission discusses how the National Planning Framework distinguishes between pressures for urban generated rural housing in the immediate areas surrounding cities and large towns. It also notes that the NPF requires local authorities to demonstrate a functional economic or social requirements for housing needs in areas under urban influence, while providing a flexible approach, mainly based on siting and design to rural housing in areas that are not subject to urban development pressure. It is noted this approach assists in sustaining more fragile rural communities, and in overall terms, will need to be related to the viability of smaller towns and rural settlements. As a result of this strategic policy direction, Leitrim County Council is likely to give consideration to revise and reduce the extent of the existing area of the County identified as having low capacity for individual houses to that within the sphere of influence of Carrick on Shannon and Sligo only along with areas of environmental or scenic sensitivity. The submission states it would be beneficial if a similar approach were adopted by Cavan County Council along Leitrim's and Cavan's boundary.

The submission makes reference to the challenges facing Leitrim and West Cavan to satisfy the requirements of the EPA Code of Practice for individual wastewater treatment systems. It is notes that Leitrim County Council will continue to be proactive at examining innovative solutions

to deal with this issue in an environmentally responsible manner. The submission states that it would be useful if an acknowledgment to the issues of satisfying the EPA Code of Practice in West Cavan was contained in the new Cavan County Development Plan. It is noted that Leitrim County Council would support the inclusion of a statement in the revised Section 4.5.4 Individual Wastewater Treatment Systems that Cavan County Council will undertake further investigation with the EPA in relation to the issue of rural wastewater disposal and will continue to be proactive at examining innovative solutions to deal with the treatment and disposal of wastewater in an environmentally responsible manner.

As part of the submission Leitrim County Council mention they have reviewed the 2002 Landscape Character Assessment which will be published as part of the draft County Development Plan in due course. It is also aired that Leitrim County Council would be happy to make this document available to Cavan County Council as part of Cavan County Council's preparation for a new county development plan.

The submission concludes by wishing Cavan County Council every success in the preparation of the new County Development Plan.

Chief Executive Opinion on issues raised

The comments made from Leitrim County Council are noted and will be considered as part of the preparation of the Draft Plan. Cavan County Council recognises the importance of collaboration with adjoining Local Authorities in the achievement of cohesive development, the efficient delivery of services and the protection of the environment. Cavan County Council also acknowledges the cross-county dimension to many strategic issues affecting both counties as noted in the submission.

Chief Executive's Recommendation

County Council has built a strong working relationship with Leitrim County Council. The Authorities has successfully collaborated on a number of projects in the past. It is the intention of Cavan County Council to maintain this important relationship into the future for the betterment of both counties and the region.

No. 18: Submission from Meath County Council

The submission commences with Meath County Council welcoming the opportunity to make a submission, it is also noted that Meath County Council look forward to continued co-operation with and between both authorities.

The submission states that Meath County Council is currently at an advanced stage of preparing the Chief Executive's Report on submissions received to the Draft Meath County Development Plan 2021-2027. The submission states that the submission from Cavan County Council was received and welcomed. The submission contains a link to view the draft plan.

The submission notes there are a number of Rural Nodes identified in the Draft Plan adjacent to the Cavan border at Ballinacree and Teervurcher.

The submission states that there is a cross-county dimension to many environmental issues and cross-county cooperation is vital to protect the environment across both counties and the region.

The submission further stresses the importance of both Local Authorities have the same high standards with regard to the protection of the environment in addition to a high level of consistency between County Plans. The submission requests that cognisance be taken of the policies and objectives of the Meath County Development Plan 2013-2019 as varied, as well as the Draft Plan for which material amendments will be published.

The submission notes the importance of the N3 strategic route and its upgrades including the Virginia Bypass. The submission states that Meath County Council remains committed to supporting and facilitating the planning and delivery of upgrades to the N3. To reflect the importance of the route, it is requested that a specific policy be included in the development plan in this regard.

Reference is made in the submission to the on-going co-operation on winter maintenance arrangements as well as operational matters on route along the boundary of both local authorities and the continuation of same.

Details of the Navan to Kingscourt Greenway is also included in the submission, noting the on-going engagement between both local authorities to deliver this project.

The submission states that cognisance should be had to a number of important sites designated for nature conservation and geological sites which straddle the County boundaries including Killconny Bog, Lough Sheelin, the River Boyne and the River Blackwater. The submission also notes that invasive species are also an important environmental cross border issues and cooperation on invasive species and European Sites has been and will continue to be necessary.

The submission concludes why requesting that issues raised in this submission are fully considered in the preparation of the new County Cavan Development Plan 2022-2028.

Chief Executive Opinion on issues raised

The comments made from Meath County Council are noted and will be considered as part of the preparation of the Draft Plan. Cavan County Council recognises the importance of collaboration with adjoining Local Authorities in the achievement of cohesive development, the efficient delivery of services and the protection of the environment. Cavan County Council also acknowledges the cross-county dimension to many strategic issues affecting both counties as noted in the submission.

Chief Executive's Recommendation

County Council has built a strong working relationship with Meath County Council. The Authorities has successfully collaborated on a number of projects in the past. It is the intention of Cavan County Council to maintain this important relationship into the future for the betterment of both counties and the region.

No. 19: Submission from Cavan Monaghan Education and Training Board (CMETB), John Kearney, Chief Executive

CMETB is the largest educational provider in counties Cavan and Monaghan and employs 1,265 staff across its facilities in Cavan and Monaghan, facilitates 14,675 learners at all levels and operates a budget of approximately €68 million per annum.

During 2006-2016, Co Cavan experienced a significant growth in population in certain areas around County Cavan. This in turn has had an impact on the educational provision in the county. Census 2016 clearly indicates that the population of children and young people in the county is 28.9% higher than whole of Ireland (26.3%).

Enrolments prepared by Department of Education in 2017 suggest primary schools would peak in 2017/2018 and post primary schools to peak by 2024/2025. Cavan primary and post primary schools have out performed these projected trends and this would point to the need for additional primary and post-primary educational infrastructure in a number of geographic areas in the county.

The audience for Post Leaving Certificate and Further Education and Training courses delivered by Cavan Institute is expected to impact positively on increased enrolment from secondary schools in the county.

CMETB needs to continue to plan for increased enrolment at its schools, and the Institute in Cavan over the next 5-6 years.

Cavan Institute

This is the 3rd largest Further Education and Training College in the county. It has outgrown its purpose-built facility and extended to a number of rental properties adjacent to the college. An extension of facilities is urgently required. CMETB intends to develop a permanent second site which will accommodate up to 500 (45%) of the current annual enrolment of 1100. This second site will deliver successful courses and will serve the needs of Apprenticeships, Traineeships and other courses. CMETB with support from SOLAS is planning to develop facilities on the Dun and Ri Barracks campus which will be available for use later this year.

Breffni College

In 2018 Breffni College completed a school extension which updated and expanded the school premises in response to increase enrolments. A further development of the existing school is needed to replace the original 1974 building. CMETB proposes to replace the old school building with a modern new build resulting in a state of the art campus catering for over 1,000 students.

Coláiste Dun an Ri, Kingscourt

This new school opened in 2016/17 has accommodation for 450 pupils with present total enrolment of 410. The 2021/22 school year will see a full complement of year groups and it is anticipated there will be an enrolment of 750 pupils. The new school does not have capacity to accommodate these school numbers. CMETB is planning to extend the existing school and almost double its capacity to respond to enrolment and curriculum demands.

New Build West Cavan

There are 2 post primary schools in West Cavan – St. Mogue's College in Bawnboy and St. Bricin's College in Belturbet, that both serve the rural parts of County Cavan. Both schools present significant infrastructural deficit in relation to the space and facilities that a modern post primary school requires. There is substantial works and significant expenditure required to update both schools. The need for capital investment in both schools and the relatively low enrolment numbers in each school provided the basis of a decision in 2018 by CMETB to propose an amalgamation of both schools in favour of a new state of the art school in West Cavan for 500 pupils on one campus.

Virginia College, Virginia

Virginia College has a growing population with 2020 bringing total enrolment to 750. There is also no school in the South East with dedicated facilities to support special education needs of incoming students. CMETB is planning a new build extension for Virginia College, to allow for the growth in enrolment and house a suite of rooms for supporting young people with additional needs and 2 ASD classrooms. This proposal has been given approval by the Department of Education and Skills in August 2020.

Gael Scoil, Cavan

There is currently one Gael Scoil in Cavan with enrolment of 103 students. There is no Gael Scoil Post Primary in the county. CMETB considers it is timely to plan for

- Potential in Dun an Ri Barracks Campus to accommodate primary and post primary Gael Scoileanna in purpose built facilities for both schools
- The development of a second primary Gael Scoil in the South East of the county as an additional feeder to a post primary school in Cavan Town.

Chief Executive's opinion on issues raised

The issues raised in relation to the needs of CMETB for education in County Cavan is noted.

Cavan County Council acknowledges the strong link between a well educated workforce and economic prosperity and therefore supports the continued educational investment in the County. The Council will work in collaboration with the Department of Education and Skills and CMETB with regard to the future educational requirements of the County. The Draft Plan will seek to support the provision of educational facilities at suitable locations as appropriate where a need is identified.

Chief Executive's Recommendation

That the draft Plan will support the provision and expansion of educational requirements at suitable locations where a need is identified.

No. 20: Submission from An Post

An Post operates two distinctive businesses – An Post Mails and Parcels and An Post Retail. The company employs more than 9,000 full time and part time staff and operates a number of subsidiary companies including An Post Insurance and Air Business.

It is likely that An Post will seek the provision of new postal facilities in the County over the plan period. The submission seeks that Cavan County Council provide a supportive policy framework for the future provision of postal infrastructure and to have due regard to the operational requirements of An Post as part of the consideration and implementation of public realm schemes in Cavan's towns and villages.

Supportive Policies include:

- 'To support An Post in the provision of new postal facilities and the enhancement of existing facilities, including operational requirements, in the County.
- 'To facilitate the provision of postal infrastructure at suitable locations in the County'
- 'To promote the integration of appropriate post office facilities with new and existing communities that are appropriate to the size and scale of each settlement'.
- In addition, appropriate zoning objectives should be included as part of the CDP 2022 to allow for enhancement of existing facilities and the development of new postal infrastructure.

Car Parking

An Post requires the use of c.3,000 vehicles on a daily basis to transport mail. Older town centre facilities in particular face challenges regarding additional space and car parking requirements. CCC are requested to provide flexibility with car parking standards for postal facilities.

Deliveries and Access

Access to postal facilities in town centres is typically required on a 24 hour basis so any restrictions on times for deliveries/collections could have a serious impact on the ability of An Post.

An Post welcomes the proposed investment in Cavan Town – Abbeylands Masterplan and notes it will enhance the vitality of the town centre area and be beneficial for residents, visitors, and businesses alike.

Chief Executive's opinion on issues raised

The issues raised in relation to the need for supportive policies for the An Post services in the draft Plan are noted.

The importance of the vitality and viability of the towns centres in Cavan is acknowledged and the draft Plan will seek to promote the growth and vibrancy of town centres of the County by providing and supporting a mix of uses in these areas including employment, retail and services.

Chief Executive's Recommendation

Policies and objectives will be included in the Draft Plan which support and facilitate the provision of key services and infrastructure in the County.

That the draft Plan includes car parking standards that considers the needs of proposed uses.

No. 21: Submission from Coillte

Coillte is the largest forest company in Ireland and plays a critical role in reduction of greenhouse gas emissions. It has provided the public with a huge range of benefits from recreation to critical infrastructure to environmental services. Coillte is Irelands leading provider of outdoor recreation activities nationally with over 3,000km of hiking trails, 12 forest parks and 260 recreational sites with over 18 million visits every year.

Coillte Land Solutions and Renewable Energy are active asset development and management businesses. They span a wide range of industries including renewable energy, housing, healthcare, education, inward investment, infrastructure development, water, tourism, and agriculture. Coillte Nature is dedicated to the restoration, regeneration, and rehabilitation of nature across Ireland. It seeks to deliver impacts on the climate and biodiversity across 4 themes

- Reforesting by planting new native woodland
- Restoration of important biodiversity habitats
- Regeneration of urban forests
- Rehabilitation of critical ecosystem services

Tourism/Recreation, Community

The Strategic Issues Paper identifies there is wide range of natural and heritage assets in the county. Coillte is in a strong position to play a key role in supporting new tourism and recreation uses including thematic tourism/recreational projects at appropriate locations. Coillte will continue to protect and enhance the walking and cycling trails within the Coillte estate including Killykeen and Dun an Ri Forest Parks. The Strategic Issues Paper refers to Cavan Tourism Strategy which identifies the need to provide tourist accommodation. Coillte support the development of tourism accommodation in Cavan for example forest-based accommodation in Killykeen Forest Park by Cabu. Coillte can facilitate the provision of appropriate tourism accommodation at other suitable sites in the long term.

Infrastructure and Development

Coillte supports the development of green infrastructure resources as referenced in the Strategic Issues Paper. Coillte can provide locations to facilitate upgrade of infrastructure and services necessary to deliver the economic development of the county e.g. sustainable water and wastewater infrastructure, telecommunications, or transport infrastructure.

Coillte supports the consolidated growth of towns and villages and its estate includes lands within close proximity to town and village centres including Virginia. These lands can provide for and accommodate alternative uses which would positively contribute to the sustainable development of the country. The Council is requested to consider the provision of planning policies/land use zoning objectives to support the provision of infrastructure/development on Coillte lands where suitable.

Renewable Energy

Coillte is one of the biggest developers of renewable energy in the State. It is targeting 1GW of new onshore projects enabled by Coillte lands in the period to 2030.

A Wind Energy Strategy should be part of its current development plan. A clear and consistent plan led approach to the delivery of renewables ensures a framework is in place to provide

certainty and predictability to the market and ensure balance between all land use constraints/opportunities.

The RSES recognises the urgent need to transition to renewable energy. PRO 4.16 of the RSES states

'The NWRA shall co-ordinate the identification of potential renewable energy sites of scale in collaboration with Local Authorities and other stakeholders within 3 years of the adoption of the RSES. The identification of such sites (which may extend to include energy storage solutions) will be based on numerous site selection criteria including environmental matters, and potential grid connection.'

- Coillte supports the development of a regional Renewable Energy Storage Strategy. SEAI's Local Authority Renewable Energy Strategy 2013 is referred to in this regard. Each local authority ensures a proportionate contribution to the achievement of new national targets.
- Each local authority carries out full assessment of all lands and classifies areas for renewables.
- Each Local Authority considers its Landscape Character Assessment and landscape sensitivities vis a vis renewable energy development.
- The draft Wind Energy Guidelines 2019 is likely to be finalised later this year. These state that the development plan should set out the following *'the identification on development plan maps of the key areas within the planning authority's functions area where there is significant wind energy potential and where.... Wind energy developments will be acceptable in principle...open to consideration...generally discouraged'*. There is also a need to prepare a Wind Energy Strategy.
- The removal of durations on planning permissions enables wind farms to continue to produce clean energy at low cost. Extension of the life of planning permissions can be costly and time consuming. Coillte and IWEA recognise the importance of having decommissioning provisions.
- Coillte is committed to ensuring that local communities benefit from having a wind farm in their locality in terms of a Community Benefit Fund which supports local recreation amenities and provides additional community project funding.
- Timber is one of the most environmentally friendly and versatile building materials available. Coillte request the promotion of sustainable timber products in the development plan.

Conclusions

In preparing the draft County Development Plan 2022-2028, Coillte requests that the plan:

- Continues to support sustainable rural based enterprises such as forestry and tourism
- Ensure zoning of sufficient lands with associated objectives for recreational, commercial, tourism, residential and community uses
- Supports the provision of accessible recreational, community and sporting facilities in the county
- Support tourism infrastructure and visitor services including tourism accommodation at appropriate locations in the Coillte estate
- Support residential and community based uses at appropriate locations within the county

- Support infrastructure and services at appropriate locations in the county
- Promote sustainable timber products
- Coillte Forestry, Land Solutions and Renewable Energy businesses and Coillte Nature have the experience and expertise to support CCC and the NWRA to realise the regions keep principles around climate action

In preparation of the development plan, CCC should:

- Include policies and objectives to recognise, promote and facilitate onshore wind and commit to ensuring the renewable energy potential of the county is maximised to achieve the targets as set out in the Climate Acton Plan
- Recognise and respond to scale and urgency of climate change by incorporating a Renewable Energy Strategy for the county
- Lead the Northern and Western region in developing a consistent approach to key RSES issues including a consistent approach to identifying suitable lands and categorising landscape sensitivity. Ensure that wind speeds, site specific engineering issues and existing grid capacity are not considered constraints in identifying suitable lands and ensure quantum is identified to account for site level attributes.
- Reconsider the attachment of conditions of finite duration to wind farm permissions
- Recognise DHPLG Wind Energy Development Guidelines
- Work in partnership with other government agencies and third parties to achieve these goals.

Chief Executive's opinion on issues raised

The issues raised in relation to Coillte's role in the provision of forestry, energy, recreational, commercial, tourism, residential and community uses in the County are noted.

The council recognises the importance of recreational facilities and their importance for tourism in the County. The need for cost effective and reliable sources of power to support the future growth and development of the County is noted and renewable energy will be an important consideration in the Draft Plan. Renewable Energy is a key objective within the NPF, and it will facilitate the transition towards a low carbon energy future, reducing greenhouse emissions and lead to a shift from fossil fuels to renewable energy sources.

The draft Plan will seek to balance the protection of the landscape and natural heritage with promoting economic opportunities. The current Development Plan supports the role of rural areas and the countryside in sustaining the rural economy and its role as a key resource for forestry, energy production, tourism etc and this will continue in the draft Plan.

The social, community and economic benefits from improving tourism offers within the County are recognised and acknowledged. Tourism policies will support the objectives of the Cavan Tourism Development Plan 2017-2022.

Chief Executive's Recommendation

That the draft development plan supports appropriate alternative energy supplies and renewable energy in the County.

That the draft development supports and protects existing and proposed recreational facilities in the County and notes same as an important tourist attraction.

That the draft Plan continues to protect and enhance the built and natural heritage of the County.

That the draft development plan protects the creation and enhancement of the rural economy and the economic benefits it delivers.

No. 22: Submission from Gas Networks Ireland

Gas Networks Ireland (GNI) is involved in 2 initiatives which benefit County Cavan from both an economic and environmental perspective

1. Development of renewable gas injection infrastructure
2. Development of Compressed Natural Gas (CNG) infrastructure

Population and Housing

Decarbonisation of existing housing stock is an important consideration and renewable gas is the lowest cost option

Climate Change

Support renewable energy infrastructure through supportive planning policies like renewable gas. Renewable gas produced by anaerobic digestion (AD) is a clean, renewable and carbon neutral fuel that can be used in heat, transport and electricity production.

The Northern and Western Regional Assembly Regional Spatial and Economic Strategy 2020-2032 (Section 8.3, RPO 8.7) states;

‘Encourage and support innovative partnerships extending the gas network in the region, including the potential for gas to grid injection facilities along with anaerobic digestion facilities’

Enterprise and Employment

Support for renewable gas production will provide significant economic benefits to local agriculture sector and rural economy. It would attract core companies and bring competitive advantages to the region.

It supports the NWRA RSES

RPO 8.6 – Facilitate the delivery and expansion of natural gas infrastructure throughout the region and have regard to the location of existing gas infrastructure in assessing potential developments.’

Transport and Infrastructure

The development plan can support renewable energy in transport through supportive planning policies;

‘The development of CNG infrastructure will enable fuel switching from diesel to CNG for heavy goods vehicles (HGV’s) and buses with the followingthere will be a presumption in favour of applications for CNG infrastructure provided planning and environmental criteria are satisfied’

Section 8.3 of the NWRA RSES supports the development of CNG;

'The Assembly support the expansion of the Natural Gas (CNG) refuelling infrastructure having regard to the National Policy Framework for Alternative Fuels Infrastructure for Transport which sets a target of 102 CNG refuelling stations by 2030'.

Natural and Built Heritage

GNI is committed to biodiversity and archaeology through the minimisation of the environmental impact of any construction and development activities.

Chief Executive's opinion on issues raised

The issues raised in relation to gas infrastructure is noted. The Council recognises the need for cost effective and reliable sources of power that are capable of supporting the future growth of the County.

Chief Executives Recommendations

The draft plan will incorporate supportive policies and objective for renewable energy infrastructure in the development plan.

No. 23: Submission from Eirgrid

Eirgrid is responsible for the safe and reliable transmission of electricity. It develops, manages and operates the electricity transmission grid. The RSES for the Northern and Western Region recognises that energy is needed for economic growth, and access to affordable and reliable energy is an essential development objective. Decarbonisation can and needs to happen and is an objective of the NPF.

Eirgrid has a number of proposed infrastructure upgrades in the Region and the RSES gives support to the delivery of these projects – RPO 4.16 to RPO 4.22 and RPO 8.1 to RPO 8.4.

The total improvements to grid infrastructure in the Region will comprise of 200km of new transmission network and line upgrades of 700km. The delivery of these projects will ensure that the population growth projections outlined in RSES will have sufficient electricity infrastructure to service them.

The North South Interconnector proposes the addition of a new 400kv overhead line connecting electricity grids of Ireland and Northern Ireland. It runs through Monaghan, Cavan and Meath in Ireland and Armagh and Tyrone in Northern Ireland. This has been deemed as a Project of Common Interest by the European Commission. The North South Interconnector is a critical electricity grid development project providing security of supply, supporting decarbonisation and reducing the cost of wholesale electricity for consumers.

The Governments Climate Action Plan 2019 has set up a target of achieving 70% of electricity consumption via renewable energy sources by 2030. Vast majority will come from wind farms and Eirgrid is required by law to connect them to the national grid. The new development plan should explicitly support the reinforcement and strengthening of the electricity transmission network. It also needs to support the successful implementation of Grid Development Strategy-Your Grid, Your Tomorrow (2017). The development plan should include the robust and sustainable policies and objectives contained in the adopted RSES. The plan should also be

explicit in how Government and State Agency policy documents have been considered and informed policy and objectives.

Chief Executive's opinion on issues raised

The issues raised in relation to the need for the support of the generation, transmission and distribution of electricity is noted and will be considered as part of preparation of the Draft Plan. The Draft Plan will make provision for electricity networks serving the County. The Draft Plan will continue to promote renewable energy sources. It will provide for the enabling of renewable energy resources of the County to be harnessed in the manner that is consistent with proper planning and sustainable development, and with regard to current Government guidelines to achieve a consensus approach by all stakeholders to the transition to a low carbon economy.

Chief Executives Recommendations

The Draft Plan will incorporate policies in support of safe, secure and reliable supply of electricity. Strong emphasis will be placed on renewable energy, in this regard the Draft Plan will include a clear policy strategy regarding the provision of renewable energy within the County.

The draft Plan will include policies and objectives that support the sustainable growth of energy infrastructure in the County

No. 24: Submission from the ESB

ESB is a landowner and employer in Cavan with property and infrastructural assets throughout the County. It operates from generation, transmission and distribution of electricity and uses its network to carry fibre for telecommunications and the provision of charging infrastructure for electric vehicles.

ESB operates a renewable energy portfolio and has capacity to supply over 830MW of green energy. They are investing in sustainable energy solutions that harnesses the power of solar, wind, wave and storage to provide for a cleaner future.

ESB is the asset owner of the Transmission System and Distribution System and ESB Networks provides the essential service of building, managing and maintaining the electricity networks in Cavan.

ESB has developed a network of almost 1,100 electric vehicle charge points across the Island of Ireland. In the Climate Action Plan 2019 the Irish Government has set targets for EV adoption.

ESB also provides communications systems and aims to become Ireland's leading independent telecommunications infrastructure provider with over 400 locations nationwide. ESB Telecoms provides network solutions for a wide variety of mobile network operators, wireless broadband providers and public sector business activities. All sites are made available to 3rd party mobile phone and wireless broadband operators. SIRO (ESB and Vodafone) are bringing 100% fibre to building to 50 towns across Ireland.

ESB supports the review of the plan which will include policies and objectives to support the delivery of energy infrastructure to meet future energy needs.

The new plans must continue to ensure that the long term operational requirements of existing utilities are protected as per PIO 108 in the current plan.

To support electricity generation away from fossil fuels to renewable generation technologies combined with the reinforcement of the electricity grid, the development plan shall include policies and objectives that support infrastructural developments increasing renewable capacity or resilience of the transmission/distribution systems like PIO 117 of the existing plan.

ESB request that the existing policies on windfarms set out in the plan and any proposed Renewable Energy Strategy are aligned with the most up to date advice and guidance which is currently the Draft Revised Wind Energy Development Guidelines 2019.

A high quality and competitive telecommunications service is considered essential to promote industrial and commercial development and improve personal security, enhance social inclusion and mobility.

PIO118- PIO126 in the current plan are supported by ESB and ESB Telecoms infrastructure in the county continues to assist in the delivery of enhanced communications networks.

The targets set in the Climate Actions Plan 2019 for EV adoption demonstrates that EV's are central to the Governments targets for zero carbon emissions transportation systems. The existing Policy PIO46, PIP4, PIO59 and PIO60 in the plan supports the delivery of infrastructure required to deliver on the targets for electrically operated cars and bicycles. ESB welcome the continuance of the above policies however suggest that an opportunity to further promote EV Charging Points exists if clear guidance were also included in the Development Management Standards for Parking in the draft plan.

Chief Executive's opinion on issues raised

The issues raised in relation to the need for the support of the generation, transmission and distribution of electricity are noted and will be considered as part of preparation of the Draft Plan. The Draft Plan will make provision for electricity networks serving the County. The Draft Plan will continue to promote renewable energy sources. It will provide for the enabling of renewable energy resources of the County to be harnessed in the manner that is consistent with proper planning and sustainable development, and with regard to current Government guidelines to achieve a consensus approach by all stakeholders to the transition to a low carbon economy.

Chief Executives Recommendations

The Draft Plan will incorporate policies in support of safe, secure and reliable supply of electricity. Strong emphasis will be placed on renewable energy, in this regard the Draft Plan will include a clear policy strategy regarding the provision of renewable energy within the County.

The draft Plan will include policies and objectives that support the sustainable growth of energy infrastructure in the County.

No. 25: Submission from SSE

This submission is sub divided into sections.

About SSE

This section of the submission gives a full overview of the company's history, operation and current projects.

Introduction

In this section SSE welcomes the publication of the Issues Paper and supports the central role that the new Cavan County Development Plan will play in implementing the National Planning Framework (NPF). The submission also makes reference to areas of the Regional Spatial and Economic Strategy for the Northern and Western Regional Assembly and the Issues Paper which relate to climate change. The submission states the delivering on the commitments of Ireland's Climate Action Plan and ensuring Ireland meets the Paris Agreement obligation is critical. It further notes that as Ireland moves beyond the coronavirus crisis, there is a need to ensure our Economy is cleaner and more resilient.

The submission highlights the following areas for consideration and notes the submission focusses on ways in which Cavan County Council can address climate change through its County Development Plan.

Onshore Wind

a) Role of onshore wind in Ireland

The submission describes renewable electricity as an Irish success story and an area of climate action where Ireland can claim to be a world leader due to the successful development of wind energy. The submission notes the economic benefits of wind energy and give an account of the SSE Airtricity Community Benefit Fund, noting that since 2009, over €1.5 m has been allocated to community groups nearby our wind farms in Co. Cavan.

b) Ensuring consistency with national policy

The submission makes reference to the Climate Action Plan and the agreed Programme for Government and key targets within. It is noted that the challenge now is to achieve twice as much as Ireland has done in the past in half the time. The submission recommends that these national targets are reflected in the County Development Plan stating it is critical that onshore wind continues to be recognised, promoted and facilitated.

The submission also makes reference to NWRA RSES RPO 4.19 which supports the appropriate development of offshore wind energy production and notes that the continued implementation of the Wind Energy Development Guidelines is of critical importance. SSE urge Cavan County Council to go beyond what is required by the WEDG to ensure that the development of onshore wind in the county is not unnecessarily restricted. The submission notes that SSE is committed to best practice in developing projects with confidence; unclear standards discourage investment.

c) Renewable energy strategy

The submission states that to guide the sustainable development of onshore wind in the county, a Renewable Energy Strategy will be needed for County Cavan. The submission outlines the required components of same and a number of recommendations. SSE encourages the use of

the SEAI Methodology for Local Authority Renewable Energy Strategies when preparing this strategy. The submission also stresses the importance of ensuring Cavan's RES is consistent with the Wind Energy Development Guidelines.

The submission notes that development in wind turbine technology are also relevant to the issuing of planning permissions noting that new consents should allow for 30-35 years operation at a minimum so as not to unnecessarily limit the operation of the development.

d) Repowering

The submission states that repowering will begin to emerge as a trend during the next County Development Plan and explains why this trend will be beneficial. SSE recommend Cavan County Council to adapt policies in support of repowering and the continued utilisation of infrastructure assets in its CDP.

Energy efficiency and the electrification of heat

The submission outlines why energy efficiency should be seen as an infrastructure priority in the new Development Plan making reference to key aspects of the Climate Action Plan. It is also noted that a partnership approach and continued collaboration between energy suppliers, the SEAI and local authorities is key moving forward. SSE mention they are proud of the work completed with local authorities and look forward to future developments. The submission recommends Cavan's County Development Plan reflect Action 64 in the Climate Action Plan which seeks to increase the energy efficiency of Local Authority social housing stock. SSE also encourage Cavan County Council to work with SEAI to target local authority housing stock and competitively tender for the delivery of deep retrofit works to ensure high quality and cost-effective outcomes.

Electrification of transport

The submission states that transport as a sector is the most significant contributor to our natural Green House Gas emissions giving reference to the Climate Action Plan. The submission notes that spatial planning at local authority level will be critical to drive the electrification of transport. It is stated in the submission that the development plan should identify areas where EV charge points could be installed and competitively tender for these assets noting the importance of this infrastructure provision.

Public lighting and smart technologies

SSE recommend that Cavan County Council aim to achieve 100% conversion to LED lighting to reduce energy consumption. The submission outlines SSE experience as a public lighting contractor and the benefits of LED retrofit projects can bring. SSE also recommends that Cavan County Council develop an improvement plan to implement remedial action and introduce the long-term improvements needed.

It is also states that there are opportunities for smart city technology to be utilised in County Cavan to assist achieve sustainability targets and Climate Action Plan goals. The submission gives an overview of such technologies and the benefits of same and recommends Cavan County Council implement similar technologies and innovations. It also contains an example used by Fingal County Council: the Smart Column which provides street lighting with a built-in technology in the column door to allow electric vehicles to charge.

Conclusion

The submission concludes by stating that the Cavan County Development Plan has an opportunity to define the focus of future investments in the County and to ensure that employment opportunities are delivered. It is further noted that the implementation of Project Ireland 2040 and the Climate Action Plan can deliver a long-term strategic planning and economic framework for the development of the County.

Chief Executive's Opinion on Issues Raised

The comments made by SSE are noted and will be considered as part of the review process for the preparation of the Draft Development Plan. It is clear that the Draft Plan needs to make provision for electricity networks serving the County. Climate Change comprises of a central cross-cutting theme which will permeate all aspects of the Draft Plan. The Draft Plan will include objectives and policies to address climate change and promote sustainable settlement and transportation strategies, including measures to reduce energy demand and reduce transport emissions.

Chief Executive's Recommendation

The Draft Development Plan will incorporate policies in support of safe, secure and reliable supply of electricity.

Strong emphasis has been placed on the need to focus on renewable energy, and in this regard the Draft Plan will include a clear policy strategy regarding the provision of renewable energy within the County.

The Draft Plan will continue to promote renewable energy sources. It will provide for the enabling of renewable energy resources of the County to be harnessed in a manner that is consistent with proper planning and sustainable development, and with regard to current Government guidelines to achieve a consensus approach by all stakeholders to the transition to a low carbon economy.

No.26: Submission from the Irish Wind Energy Association

Irish Wind Energy Association (IWEA) welcomes the opportunity to make a submission. The submission sets out responses to questions posed under the following strategic issues: climate change, enterprise and employment, towns and villages and community facilities.

Climate Change

Question 1: How can the new development plan address the issues of Climate Change?

The submission makes reference to the National Climate Action Plan and its targets and requirement of same. The submission recommends that a Renewable Energy Strategy should be prepared as part of the new County Development Plan. IWEA encourages Cavan County Council to take an ambitious approach to deciding its potential target for installed capacity of wind energy under the new Renewable Energy Strategy. It is also noted that Cavan needs to facilitate its potential for onshore renewable resources to the maximum extent as a key step towards decarbonisation.

Question 2: How can the development plan promote renewable energy like wind and solar?

The submission states that a Renewable Energy Strategy should be prepared as part of the County Development Plan. IWEA suggests that both this strategy and the County Development Plan ensure there is adequate land suitable for wind energy production. It is also stated that a clear policy ambition for County Cavan is critical to guide the strategy and the identification of a sufficient quantum of potentially suitable land.

Question 3: What actions concerning Climate Change need to be inserted in the new development plan?

The submission suggests that defining a target of achieving a build out of at least a doubling of generation capacity of wind energy in County Cavan by 2030 would be a tangible action. The latter will require that a sufficient quantum of land to accommodate many multiples of the target to be classified as suitable for wind energy.

The submission notes that the Department of Housing, Planning, Community and Local Government Section 28 Guidelines, clearly sets out a specific planning policy requirement that, in making a development plan with policies and objectives that relate to wind energy development, the planning authority shall carry out the following three actions:

1. Ensure that overall national policy on renewable energy is acknowledged and documented in the development plan
2. Indicate how the implementation of the development plan will contribute to realising overall national targets on renewable energy and climate change mitigation and in particular wind energy resources and,
3. Demonstrate detailed compliance with item no. 2 above with regard to development management objectives and have such development management objectives subject to SEA and AA with regard to likely significant effects on climate factors in addition to other environmental factors.

The submission states that all of these actions need to be taken into account of when developing the new CDP.

Question 10: What can this plan do to address Climate Change? What policies do you think need to be included in this regard?

It is stated in the submission that the plan needs to encourage and support the development of wind energy and other renewable energy projects in-order to decarbonise our electricity system and facilitate the transition to increased use of electricity for transport and heat.

The submission explains that due to current government renewal energy policies, planning permission is the critical first stage of any renewable energy projects. The submission notes that a projects must have planning permission granted before an application can be applied for a grid connection. The submission states that clear and supportive planning policies for wind and all renewable energy developments will be required to ensure we meet the challenges of addressing climate change and decarbonising the Irish economy. The submission advises that a new Renewable Energy Strategy as part of the CDP would form the basis of such policy.

Enterprise and Employment

Question 1: How can Cavan be promoted to attract investment in employment and enterprise?

The submission makes reference to the fact that Foreign Direct Investment Companies in addition to large indigenous commercial/industrial firms are attracted by the proposition of using green energy and securing a competitive advantage in the global marketplace.

The submission outlines requirements for the decarbonisation of existing industries as per the Climate Action Plan and notes that in addition to this, any new FDI will want to decarbonise from the beginning, therefore having an abundant supply of renewable energy is necessary. The submission further states that by facilitating the development of renewable energy, the platform for the development of future industry will be laid down.

Towns and Villages

Question 3: How can we ensure our towns and villages retain and enhance their vibrancy and economic well being

The submission states that wind energy can contribute to the economic well-being of towns and villages.

The submission outlines the economic benefit to the county of wind farms. It is noted that if the next Cavan County Development Plan included the correct policy foundation for a further 150MW of wind energy, this would result in an annual investment of over €3.75 million in the Cavan economy, or €112.5 million over the 30-year operational lifespan of projects.

The submission also includes a separate thorough submission which elaborates on some points contained Part 1 of the submission. This part of the submission is divided into the following sections:

1 Introduction

1.1 County Cavan's Renewable Energy Strategy

The submission states that Cavan County Council should take this opportunity to review its renewable energy policies, noting the importance of clear and supportive planning policies for wind and all renewable energy developments will be required to ensure we meet climate change and decarbonising challenges. In addition, the submission notes that Cavan requires a progressive and ambitious Renewable Energy Strategy as part of the Plan.

1.2 IWEA and Wind Energy in Ireland

The submission gives an overview of the IWEA and wind energy development in Ireland to date, noting that Ireland, has enormous renewable energy resources and are world leaders at incorporating onshore wind to the national grid. It is noted that onshore wind needs to continue growing in Ireland to meet future renewable energy targets with Ireland's Climate Action Plan, emphasising the role of Cavan County Council also.

1.3 Wind Energy is Popular

The submission references a number of opinion polls carried out and their findings, noting that 79% of Irish people were strongly in favour, or tended to favour, wind energy. It is also stated that IWEA believe it is important to consider the views of those living near wind farms, but also the wider Irish society when identifying the priorities for the new County Development and Renewable Energy Strategy for County Cavan.

2 National Policy

This section gives an overview of national policy and targets within. It also refers to the role of Cavan County Council has to help achieve these targets.

3 Investment Opportunities

The submission notes that wind energy generates two types of economic benefits, the initial capital investment and the ongoing investment during the operational life of the wind farm. The submission gives of investment to the country and the county to date and also give future projections.

4. Policy Ambition

IWEA encourages Cavan County Council to take an ambitious approach to deciding the actual installed capacities of wind energy the new Renewable Energy Strategy for County Cavan is going to aim to facilitate by way of how many MW or GW of wind energy it should make provision for and deem lands acceptable in principle or open for consideration. The submission outlines how Cavan County Council can do this.

IWEA strongly suggests that Cavan County Council classifies a sufficient quantum of land as being suitable for wind energy, to ensure national renewable energy targets can be achieved, and demonstrate how the quantum of land classified as suitable is sufficient for this purpose. IWEA also contend that the level of policy ambition set by Cavan County Council should dictate the criteria used in preparing their wind energy portion of the new Renewable Energy Strategy for the County.

Methodology

IWEA strongly encourages Cavan County Council to adopt the LARES approach to the preparation of the new Renewable Energy Strategy as part of the County Development Plan. In addition, IWEA encourages Cavan County Council to engage with adjoining Local Authorities to ensure a consistent approach is taken across county boundaries.

The submission contains a list of potential constraints or facilitators in the process of identifying areas as being potentially suitable for wind energy developments.

5.1 Landscape Capacity and Landscape Sensitivity

The submission notes that there remains significant landscape capacity across County Cavan for onshore wind energy production. It further notes that the most scenic parts of County Cavan can still be protected and deemed not normally permissible for wind energy in the new Renewable Energy Strategy for County Cavan, but it will still be necessary to extend the areas that will be considered suitable for wind farm development into slightly more sensitive landscape areas if we are to deliver targets in the Climate Action Plan.

6. Regional Approach

In the submission IWEA indicate that they advocate a regional-approach to the spatial planning of wind farm developments, to compliment the Local Authority-level approach. The submission outlines the benefits of a regional approach and highlights specific policy objectives in the Regional Spatial and Economic Strategies for the three regions in Ireland which relate to this area. The submission further notes that the 3-year timeframe for the co-ordination of the identification of potential renewable energy sites of scale in the Northern and Western Regional

Assemble area is particularly relevant in the context of the new development plan and strategy for County Cavan.

In addition, it is noted that Local Authority-based approach to incorporating renewable strategies into their development plans, to compliment the Renewable Electricity Policy and Development Framework currently being prepared by the Dept. of Communications, Climate Action and the Environment. It is also noted that IWEA will continue to advocate for the preparation of Regional Renewable Energy Strategies.

7. Reference to Wind Energy Development Guidelines

The submission notes that IWEA believe that a new Renewable Energy Strategy for County Cavan should not seek to replace or alter the requirements of the Wind Energy Development Guidelines. It is further stated that the new strategy need not and should not seek to alter or vary whatever guidance emerges from the Department by way of a targeted review, but should refer to the Departmental Guidelines as setting the project-level design standards that will be expected of any wind farm development proposed for County Cavan.

Chief Executive's Opinion on Issues Raised

Specific comments made by the Irish Wind Energy Association are noted and will be considered during the preparation of the Draft Plan. It is acknowledged that the Draft Development Plan needs to make provision for electricity networks serving the County. Climate Change comprises of a central cross-cutting theme which will permeate all aspects of the Draft Plan. The Draft Plan will include objectives and policies to address climate change and promote sustainable settlement and transportation strategies, including measures to reduce energy demand and reduce transport emissions.

Chief Executive's Recommendation

The Draft Development Plan will incorporate policies in support of safe, secure and reliable supply of electricity. Strong emphasis has been placed on the need to focus on renewable energy, and in this regard the Draft Plan will include a clear policy strategy regarding the provision of renewable energy within the County. The Draft Plan will continue to promote renewable energy sources. It will provide for the enabling of renewable energy resources of the County to be harnessed in a manner that is consistent with proper planning and sustainable development, and with regard to current Government guidelines to achieve a consensus approach by all stakeholders to the transition to a low carbon economy.

No. 27: Submission from the National Council for the Blind of Ireland (NCBI)

The submission outlines the role of the NCBI and gives an overview current services in addition to the number of people living in Cavan and Ireland with vision impairments.

Population and Housing

The submission notes the specific housing needs of people who are blind or vision impaired. The submission seeks Cavan County Council to review its policy in relation to allocation of housing to ensure that the policy recognises the needs of people who are blind and vision impaired. The submission also outlines what policy introductions should be included as part of the new County Development Plan.

Climate Change / Cavan Town and Environs / Towns and Villages

Changes to Street Design

The submission references the increased number of people walking and cycling in addition to the renewed government focus on increasing the number of people walking and cycling. The submission requests, where any changes to street layouts are going to be made, that Cavan County Council consult with representative organisations including NCBI and people who are blind or vision impaired who live in the locality to ensure that their needs are fully considered.

Obstacles on the Footpath

In relation to access and footpaths, the submission gives an overview of some obstacles on footpaths for the blind or vision impaired person, outlines the dangers of same and includes a number of requests to improve access. The submission references that NCBI had to cancel its annual #ClearOurPaths campaign due to Covid-19, noting the core objective of this campaign is to highlight the dangers of temporary obstacles on the footpaths.

Reduction in speed limits

The submission contains a section on reduction in speed limits and notes that Dublin City Council has proposed a change to the speed limit from 50 kilometres per hour to 30 kilometres per hour on all roads. The submission recommends that Cavan County Council make similar reductions to the speed limits in all towns and villages and on certain approach roads where there are a high volume of traffic and limited or no designated safe road crossing points.

Accessible Crossing Points

In this section the submission outlines a number of factors regarding the provision or absence of accessible crossing points. The submission outlines the importance of accessible crossing points, gives an overview of current provision and the impact of crossing points that are not appropriate. It is noted that most of the crossings in County Cavan are zebra crossings. The submission requests:

- Cavan County Council to review its policy in relation to accessible pedestrian crossings. The submission outlines best practise for accessible crossing points and includes links for further information.
- Cavan County Council to provide an easy and accessible way for people with impaired vision to report problems with crossings.

Appropriate Street Lighting

The submission states that Cavan County Council must provide appropriate street lighting in all public places including bus stops, footpaths and public car parks.

Shared Spaces

The submission notes that the NCBI is in favour of universal design but does not recommend the use of shared spaces. The submission notes it is essential to provide footpaths with kerbs, for the safety of pedestrians with impaired vision, and / or with other disabilities, older people, and young children. The submission makes reference and provides a link to the Lord Holmes UK

Report, 2015 entitled “*Accidents by Design: The Holmes Report on shared space in the United Kingdom*” noting its key findings. The submission requests Cavan County Council to inform themselves of the risk associated with shared space and implement its responsibilities under equality legislation.

Accessible Signage

The submission requests that Cavan County Council ensures that signage in public offices, services and at local businesses comply with accessibility requirements.

Employment and Enterprise

The submission makes reference to CSO statistics indicating the level of labour force participation amongst people who are blind and vision impaired (1 in 4 people with impaired vision were actively participating in the labour force) and the impact of Covid-19 had reducing this figure. The submission commends Cavan County Council on the establishment of the Local Enterprise Office. The submission notes that Cavan County Council need to engage with the NCBI in relation to barriers for people with vision impairments accessing the Local Enterprise Office following the easing of Covid-19 restrictions. The submission requests that Cavan County Council initiate a project that will increase awareness amongst the Local Enterprise Office staff about the challenges facing people who are blind and vision impaired in terms of accessing its services.

Transport and Infrastructure

The submission notes that public transport is often the only option for independent travel for people who are blind or vision impaired. It is requested that public transport operators in Cavan must be obliged to put a policy in place for passengers who are blind and vision impaired.

The submission highlights the importance of and requests that people who are blind or vision impaired are consulted at every stage of transport infrastructure projects or transport service change. It is also noted that any such plan needs to be disability proofed.

The submission also notes there are no bus shelters at designated rural link stops and requests Cavan County Council to include the provision of bus shelters for rural link stops in the new plan. It further states that providing safe bus shelters in designated areas is of great important to those who are blind and vision impaired.

Natural and Built Heritage / Tourism and Arts / Community Facilities

The submission requests that the new plan includes a commitment to ensure all local public amenities are accessible to people with vision impairments including transport, leisure and public space amenities including those amenities within our natural heritage. The submission outlines a number of requests relating to same.

The submission states that NCBI are happy to discuss and work with Cavan County Council regarding the recommendations and requests contained in the submission.

Chief Executive's Opinion on Issues Raised

The comments made in the submission are noted. The Council will support measures that address the needs of communities within the County and will seek to provide the basis for a more socially inclusive society which promotes participation and access for all. Although the Council is not a public transport provider, it has an important role to play in accommodating public transport within the County. The need to improve public transport is accepted and be explored in the preparation of the Draft Plan.

Chief Executive's Recommendation

The Draft Plan will seek to promote social cohesion and tackle deprivation and reduce inequalities. Planning for all sectors of the community and quality of life will also be addressed in the Draft Plan.

That the draft plan will support measures that address the needs of communities within the County and will seek to provide the basis for a more socially inclusive society which promotes participation and access for all.

No. 28: Submission from the Irish Wheelchair Association

This submission was prepared by the Irish Wheelchair Association (IWA) Access Advisory Service in collaboration with the IWA Resource and Outreach centre Cavan.

The submission notes the goal of the IWA as: Making Cavan one of the most assessable counties in Ireland.

Introduction

The submission details an overview of the organisation and outlines the services it provides.

Vision

The submission states the vision of the IWA as an Ireland where people with disabilities enjoy equal rights, choices and opportunities, in how they live their lives, and where our country is a model worldwide for a truly inclusive society.

Opportunity

The submission notes that Cavan County Council has an opportunity in the preparation of a new Development Plan to enhance the accessibility of the County, including the built environment and services, and promoting Cavan as a destination of choice for people with disabilities.

Background

It is stated that IWA's direct aim in contributing to County Cavan Development Plan consultation, is to continue its work promoting and advancing the vision and realisation of all-inclusive and accessible society. IWA recommends that the promotion and development of a socially and economically inclusive society for people with disabilities must be a high-level priority within all Local Government Plans.

Policy Context

The submission outlines that significant legislation exists nationally and internationally to guide and inform policy and planning to support the rights of community participation for people with disabilities. The submission further explains that in 2018, Ireland committed to the realisation of the United Nations Convention on the Rights of Persons with Disabilities which can be best realised at a local community level, supported by a national framework.

The submission notes that the preparation of a new County Development Plan offers Cavan County Council the opportunity to align its' intended actions with the aspirations and commitments made by Government to people who have a disability under the UNCRPD.

IWA's recommends the following actions to be included as part of the plan:

Cross Cutting Themes

It is recommended that cross cutting themes are addressed within the County Development Plan regarding the provision of public services to people who have a disability, they must include the following:

- Mainstreaming of all public services whereby services are supplemented and enhanced by agreed disability specific measures
- Sustainability, social inclusion, disability proofing and high-quality Universal Design must be the influencers and enablers in the development of local policies, actions and programmes for the diverse requirements of all citizens to be meet.
- Real and continuous consultation with people who have a disability and their representative organisations
- Strategic planning and ongoing monitoring and review of the effectiveness of service provision to people generally and particularly to people who have a disability.

Pillars for Action

IWA proposes that Cavan County Council set out in the CDP under the following Pillars with a commitment that each Pillar and any proposed additional pillar, align with the relevant Articles within the *United Nations Convention on the Rights of Persons with Disabilities* and that commitments to disability be supported with agreed disability specific measures.

1. UNCRPD Pillar 1 Inclusive Approach to Planning

The submission sets out how Cavan County Council can have a considerable and lasting effect on creating an equal standard of living for people with disabilities if an inclusive approach within the overall strategy for the county is adopted. The submission states that can be achieve by aligning all relevant disability specific legislation from the Disability Act 2005 and to aspirations set out under the Articles of the UNCRPD. The submission also notes that the aspirations to achieve best practice should be a driver and enabler to the CDP noting that the disability specific legislative alignment and commitment to best practice can achieve exemplar practices at regional and local levels, will ensure that a sense of civic inclusion and local ownership is created in meeting strategic objectives and commitments.

2. UNCRPD Pillar 2 Infrastructure and the Public Realm

The submission refers to publications which includes guidance and notes that IWA members continue to experience environmental barriers within local communities and reaffirmed IWAs mandate to continue to advocate for much improved accessibility.

IWA recommends the promotion and delivery of an all-inclusive and accessible environment and calls on the CDP to adopt, utilise and promote the IWA Best Practice Access Guidelines, Edition 4, within all areas of building and environmental design.

The submission gives an overview of the IWA Best Practice Access Guidelines and provides particular examples of best practice accessible design provision within public realm areas.

IWA encourages Cavan County Council to embrace Universal Design approach in adopting these guidelines, to inform its's planning and design in all aspects of the Public Realm.

3. UNCRPD Pillar 3 Social Housing

The submission notes that the experience of IWA members who are wheelchair users in accessing social housing has not been positive and explains why. IWA recommends that the CDP commit that all social housing projects deliver 10% of integrated fully wheelchair accessible social housing units within choice locations that are accessible to community amenities and transport links. It is also noted that the inclusion of fully wheelchair accessible design into each social housing project planning from the outset at stage 1 is required.

4. UNCRPD Pillar 4 Transport

The submission states as per Article 9 of the UNCRPD that, "parties shall take appropriate measures to ensure persons with disabilities access, on an equal basis with others, to the physical environment, to transportation, to information and communications". It is noted that although the UNCRPD requires Ireland to take appropriate measures to ensure that people with disabilities have access to transport on an equal basis with others, IWA members regularly report experiences where this is not the case, examples of same are included as part of the submission.

IWA recommends that Cavan County Development Plan enshrines a commitment to ensure collaboration with all transport providers that will result in wheelchair accessible transport availability across all transport services, public and private alongside the necessary disability specific infrastructure required for each mode of transport.

5. UNCRPD Pillar 5 Consultation and Collaboration

The submission states that Article 4 of the UNCRPD asserts that members states "shall closely consult with and actively involve persons with disabilities, including children with disabilities, through their representative organisations". The submission also notes that real and ongoing consultation and collaboration offer great opportunities for learning in the development of sustainable designs and operational planning.

IWA recommends that Cavan County Council commits to a continuing process whereby the Council fully engages and consults on the details of design within the public realm and of public buildings and in the delivery of services, with people who have a disability.

6. UNCRPD Pillar 6 Enterprise and Employment

The submission states that as per Article 27 of the UNCRPD, "Parties` recognise the right of persons with disabilities to work, on an equal basis with others, this includes the right to the opportunity to gain a living by work freely chosen or accepted in a labour market and work environment that is open, inclusive and accessible to persons with disabilities". The

submission further states that people with disabilities are still significantly excluded from the labour market due to several social and environmental factors. The submission references research completed by the National Disability Authority.

IWA Recommends

The submission states that under the Comprehensive Strategy for People with Disabilities 2015-2024, the Government has committed to increasing the public service employment target for persons with disabilities on an incremental basis from a minimum of 3% to a minimum of 6% by 2024. IWA recommends that the Cavan County Development Plan commits to achieving this 6% and beyond employment target within the timeframe between 2022-2028. It is also requested that Cavan County Council provides leadership to local employers in raising awareness regarding employment of people with disabilities and to demonstrate how improved environmental issues, supports employment opportunities taken up by people who have a disability.

The submission provides a link to the *Irish Wheelchair Association Best Practice Access Guidelines* and notes that the fourth edition of same will issue in the early Autumn.

Chief Executive's Opinion on Issues Raised

The issues raised and recommendations made by the Irish Wheelchair association are noted and will be taken into consideration during the preparation of the Draft Plan. The Council will support measures that address the needs of communities within the County and will seek to provide the basis for a more socially inclusive society which promotes participation and access for all. The Draft Plan will seek to promote social cohesion and tackle deprivation and reduce inequalities. Planning for all sectors of the community and quality of life will also be addressed in the Draft Plan.

Chief Executive's Recommendation

The Council is committed to developing a more socially inclusive society and promoting participation and access for all. The draft plan will incorporate supportive policies and objectives to improve the quality of life of people with disabilities.

3.2 Countywide Submissions

This section contains a summary of the written submissions received as part of the Pre Draft consultation phase, relating to countywide issues. The opinions and recommendations of the Chief Executive to the issues raised within are also included.

No. 29: Submission from Cavan Sustainable Energy Group

The Governments recently published Climate Action Plan to Tackle Climate Breakdown seeks to dramatically increase the rate of home retrofits from around 25,000 per year to over 50,000. It also aims to increase the average Building Energy Rating (BER) to a minimum B2 and targets electricity from renewables by 2030 to be at 70%.

Sustainable Energy Communities (SEC) programme aims to build capacity in local administration, SME, community, local councils, and voluntary sectors to manage energy use and establish local energy generation projects.

The Renewable Energy Directive 2018/2001 states that Member States shall

- Ensure the final customers, in particular households, are entitled to participate in renewable energy
- Ensure that renewable energy communities are entitled to a) produce, consume, store, and sell renewable energy b) share, within the renewable energy community, renewable energy that is produced and c) access suitable energy markets
- Carry out an assessment of the existing barriers
- Provide an enabling framework to promote and facilitate the development of renewable energy communities

Cavan Sustainable Energy Group (CSEG) is a community-based energy working group co-ordinated by Cavan County Local Development. CSEG comprises of a number of public and community organisation representatives across Cavan. CSEG have completed an Energy Masterplan for Co. Cavan which presents a baseline of energy use and key issues to be addressed in the county.

This indicates that Energy Poverty is a significant factor in the county with

- 12 Small Areas (SA) classified as very high risk,
- 39 SA classified as high or very high which is 10% of total population of county
- It notes unemployment is considerably higher in high or very high-risk areas at 16% compared with 8% for county.
- A total of 12% of the county is located in high or very high-risk areas.
- 94% of housing has a BER rating of below B2

The challenge in the county is to upgrade the housing stock to a target of B2 set by the national Climate Action Plan. The Energy Masterplan sets out a number of recommendations which provides a blueprint for addressing identified energy issues and this should be included in the new County Development Plan 2022-2028.

Chief Executive's opinion on issues raised

The issues raised in relation to the need for inclusion of energy issues into the draft Plan are noted. The draft Plan will include policies and objectives to ensure that the national Climate Action Plan is incorporated at a local level. The information included in the Energy Masterplan for County Cavan can be used as a blueprint for same.

Chief Executive's Recommendation

That the draft County Development Plan includes as per the Planning and Development Act promotion of the need to address the necessity of adaptation to climate change and supportive policies and objectives for the delivery of sustainable energy.

No.30: Submission from Roadstone Limited

This submission was prepared by SLR Consulting on behalf of Roadstone Limited. The submission is divided under the following headings:

Roadstone Limited

This section gives an overview of the company and its history. It is noted that the company is Ireland's leading supplier of aggregates, construction and road building materials employing several hundred people throughout the country. The submission lists and maps Roadstone's Limited property assets in Co. Cavan.

Basis of the Submission

National and Regional Policy Context

The submission notes that the importance of the extractive industries to the wider economy and the need to protect the operations of working quarries and proven aggregate resources is firmly established in national and regional planning policy. The submission details policies contained in both the NPF and the RSES which are supportive of the extractive economy.

Importance of Extractive Industries

This submission states that in preparing policies that reflect the importance of the extractive industries, Cavan County Council should consider the recently published Essential Aggregates – Providing for Ireland's Need to 2040. A copy of same is included with the submission. The submission outlines the purpose of the report and the importance of its recommendations.

Current Development Plan Policies

The submission references the current County Development Plan 2014-2020 vision and notes the plan acknowledges the importance of the extractive industry. The submission includes the following policies and objectives which relate to the extractive industry: EDP6, EDP7, EDP8, EDP9, EDP10, ED, EDO21, EDO22, EDO23, EDO24, EDO25 and EDO26.

Cavan County Development Plan 2022-2028 – Issues Paper

The submission outlines the purpose of the Issues Paper and makes reference to particular sections including, Cavan Town, Housing and Population, Enterprise and Employment, etc. It is noted that there is no mention of the extractive or mineral industry or its benefits within the

document, noting there is only a single mention of the industry in the Issues Paper which is included in the Environment, SEA, AA, Flooding and Our Waters section.

Submission Comments

The following are the key points that Roadstone Ltd, would like to see addressed in the Draft County Development Plan 2022-2028:

- Adequately outline the economic value and significance of the aggregates and minerals sector in County Cavan, emphasising the sectors significance and added value in terms of the local, regional and national economy in terms of employment generation and providing raw materials for the construction industry.
- Safeguard areas of significant resources and un-worked deposits from incompatible developments to ensure the viability of the extractive industry, whilst ensuring that environmental, rural, scenic and residential amenities are protected.
- Construct policies to avoid adverse effects on aggregate resources and related extractive industries and added-value production that are essential for our built environment, infrastructure and future economic development.
- Have due regard to Roadstone Ltd.'s property assets within the county.

Conclusion

The submission outlines concern regarding little mention of the quarry or extractive industry within the Issues Paper and outlines the sector's importance regarding economic development and employment.

The submission requests that the Draft Plan adequately outlines the economic value and significance of the aggregates and minerals sector, as per the current County Development Plan.

The submission notes that a long-term secure supply of aggregates and value added products should be balanced carefully against the potential for environmental and other effects.

The submission also states that it is important to ensure that the future interpretation of the county development plan policies does not result in the sterilisation of aggregate resources and does not prevent the secure, long-term supply of construction aggregates and related value-added products.

Chief Executive Opinion on issues raised

The Draft Plan will support the continuing viability of agriculture, horticulture and other rural based enterprises within rural areas. Agriculture, forestry, equine and the extractive industry are other important rural resources with potential for development in a controlled and sustainable manner.

In terms of the extractive industry, the Draft Plan will acknowledge that aggregates are a significant natural resource which needs to be developed with wider environmental issues as a key consideration.

The importance of the extractive industry and its role in the economic growth of the County is noted. The Draft Plan will seek to support such development in appropriate locations subject to environmental and other relevant factors.

Chief Executive's Recommendation

That the draft plan continues to recognise the role that extractive industries has in the implementation of the National Development Plan.

That the policies and objectives in the draft Plan acknowledge the importance of the aggregate industry to the County in terms of its economic benefits and employment generation.

No. 31: Submission from Keep Ireland Open

The submission gives an overview of the organisation, its aims and its membership. The scope of the submission is limited to access to the countryside and directly related issues. Cavan County Council (CCC) are obliged to have regard to plans in adjoining counties.

It is noted that the new Cavan County Development Plan should be in full conformity with the North West RSES.

It is stated that the submission is focused on issues of walking/cycling, public rights of way and better access to the countryside. The basis of the submission is based on a critique of the 2014 plan.

Format change including index, sub-numbering, chapter title and page numbers and development management standards to be at the end of each chapter.

The submission contains suggested text, policy and objectives changes/additions to the following Chapters and subsections

- Chapter 3: Economic Development: Agriculture & Farm Diversification, Extractive Industries, Forestry.
- *Chapter 4: Physical Infrastructure, Sustainable Transport, Walking and Cycling, Electricity, Renewable Energy, Wind Energy, Telecommunications and Information Technology*
- *Chapter 7: Built Heritage & Archaeology: Archaeological Heritage*
- *Chapter 8: Natural Heritage & Environment: Natural Heritage, European Sites, Special Protection Areas, Special Areas of Conservation, Geological Heritage, Marble Arch Caves/Global Geopark, Wetlands, Woodlands, Trees, Hedgerows and Stonewalls Policies, Landscape and Amenity Areas, Landscape Categorisation, Character Areas, Landscape Features, Special Landscape Policy Areas, County Heritage Sites, Scenic Views & Viewing points, Scenic Routes, Forest & Other Parks, Major Lakes & Environs, Lakeside Amenity Areas, Riverside Amenity Areas, Inland Waterways, Public Rights of Way and Green Infrastructure.*
- *Chapter 9: Recreation and Tourism Recreation: Recreation and Tourism Recreation, Walking and Cycling, Tourism Accommodation in Rural Locations.*

Chief Executive's opinion on issues raised

The issues raised in relation to the policies and objectives will be considered as part of the draft Development Plan on issues like cycling, walking, public rights of way, forestry, quarrying, infrastructure and heritage are noted. The draft Development Plan will support the role of rural areas and the countryside in sustaining the rural economy and its role as a key resource for agriculture forestry, energy production, carbon reduction, tourism, recreation, mineral extraction and/or new emerging rural based enterprises.

The social, community and economic benefits from improving tourism offers within the County are recognised and acknowledged.

Chief Executive's Recommendation

That policies and objectives are included in the draft Development Plan that actively supports sustainable development of the County including the promotion of the growth of rural enterprises, including activities that are resource dependent, like energy production, extractive industries and small scale industry.

That policies and objectives are included in the draft Development Plan for the protection and sustainable use of the County's built and natural heritage.

The policies and objectives are included in the draft Development Plan that support sustainable Tourism in County Cavan in accordance with the Cavan Tourism Development Plan 2017-2022.

That policies and objectives are included in the draft Development Plan that support infrastructure for increased walking and cycling in the County.

No. 32: Submission from SKRD Ltd

The submission is divided into the following headings:

Population & Housing

- Introduce incentives/tax breaks for individuals to buy properties on Main Streets as a means to bring people back into town centres.

Climate Change

- The submission makes reference to a government energy scheme for existing housing development which was under advertised and relatively unattainable. It is suggested that this incentive plan should be offered to towns and villages to upgrade properties and make them more energy efficient.
- The submission notes that a study should be completed to zone natural heritage sites, labelled in terms of viability for future investment. The submission also notes that more information boards should be installed at sites of natural biodiversity, in-addition to linking schools with such sites as a way of protecting them.
- The submission requests that recycling should be made more accessible and outlines measures which need to be introduced to facilitate this.
- The submission requests the introduction of communal allotments and composting units and notes the benefits of same.

- The submission requests that reusable plastics be encouraged with incentives.
- Link charity shops to your PPS number to treat your donation as a tax break.
- Create an app to show the location of electric charging points.
- Ensure new enterprises incorporate shielding so as not to impact on the aesthetics of the area.
- Relocate recycling bins underground or camouflage somewhat.

Enterprise and Employment

- Improve roads to reduce commute time.
- Educate people on how to budget. The submission contains suggests for same.
- Make it worthwhile for people to work, the submission notes that often there is minimal different between social protection payment and a weeks wage.
- Improve Broadband to facilitate remote working.

Towns and Villages

- The submission notes how to improve the image of towns and villages through the provision of seating, planting, etc.
- The submission suggests the introduction of incentives/tax breaks for individuals to buy properties on Main Streets would help bring people back to town centres.

Transport and Infrastructure

The submission outlines a number of ways to improve walking and cycling facilities in the county.

Natural and Built Heritage

The submission notes that individual towns and villages will probably be aware of their heritage and that a separate call could help identify these. Highlight and educate about Shercock's heritage.

Tourism and the Arts

The submission outlines a number of water tourism initiatives that can be developed.

Chief Executive's opinion on issues raised

The issues raised in relation to the policies and objectives that should be included in the draft Development Plan on issues like housing, climate change, enterprise and employment, transport, towns and villages, transport, natural and built heritage are noted.

The draft Development Plan will support:

- The delivery of housing on main streets of the County towns and villages
- The necessity for Climate Change
- An assessment on the requirement for lands for Enterprise and Employment
- The improvement of the image of our towns and villages
- The benefits of walking and cycling
- The importance of protection of the Natural and Built Heritage
- The importance of Tourism in the county.

Chief Executive's Recommendation

That policies and objectives in the Draft Development Plan actively support the delivery of appropriately located housing in accordance with the Core Strategy

- Climate Change
- The delivery of Infrastructure required for Enterprise and Employment
- Improvement of the image of our towns and villages
- Improvement in infrastructure for walking and cycling
- Protects our Natural and Built Heritage
- Promotes sustainable tourism

No. 33: Submission from Cavan County Local Development

Cavan County Local Development is recommending that the Cavan County Development Plan both acknowledges the contribution that social enterprise can play in the socio-economic development of the county and in addressing environmental issues facing the county. The submission references UN, EU and the Irish Government acknowledgements regarding the significant contribution that social enterprise makes to the economic and social development of both rural and urban areas, whilst playing a central role in addressing environmental challenges such as climate change and the shifting to a circular economy.

Chief Executive's Opinion on Issues Raised

The contribution that social enterprise plays in the socio-economic development of the county and in addressing environmental issues facing the county is recognised. The Draft Plan will explore appropriate strategic objectives and policies for the County that will assist in developing the full potential of the County in terms of economic, social and environmental development.

The challenge for the Core Strategy will be to devise ways to ensure that the carbon footprint of existing and new development is reduced and to build new developments in a way that are resilient to Climate Change. This will require a comprehensive approach which targets issues of flooding, waste, infrastructure, energy, affordable homes, open space, design and transport.

Chief Executive's Recommendation

Policies and objectives to support social enterprise will be explored during the plan making process.

3.3 Cavan Town Submissions

This section contains a summary of the written submissions received as part of the Pre Draft consultation phase, relating to Cavan Town. The opinions and recommendations of the Chief Executive to the issues raised within are also included.

No. 34: Submission from Cavan Chamber

The submission references the current situation for retailers noting the decline in traditional retailing. The submission notes that projects such as Abbeylands will provide Cavan town with an exciting foundation for expansion and change for the benefit, not only of the town, but the county as a whole.

Cavan Town

The submission requests that Cavan town to be as user friendly and welcoming as possible with no impediments for town users or visitors. The submission outlines a number of suggestions for improvements regarding footpaths, car parking, signage, waste management, recreational facilities and supports for enterprise and employment in Cavan Town.

Chief Executive's Opinion on Issues Raised

Specific comments made relating to physical and social infrastructure are noted and will be considered during the preparation of the Draft Plan and Local Area Plan for Cavan Town. A key theme in the local area plan review is the sustainable renewal and the future growth of Cavan town centre. The Draft Local Area Plan will address this in considerable detail. The Draft Local Area Plan for Cavan Town will also seek to continue to support and facilitate economic development at appropriate locations throughout the town and environs. It is intended that an updated retail strategy will provide the context for retail policy in the Draft Plan taking account of the changing economic environment and behaviour of shoppers in the County.

Chief Executive's Recommendation

The Draft Plan will explore specific policies and objectives for Cavan Town as part of the Local Area Plan preparation. These policies and objectives will assist in developing the full potential of the town in terms of economic, social and environmental development.

No. 35: Submission from Terry Argue AOR Insurances

This submission relates to Cavan Town and contains a number of proposals with specific requests relating to infrastructure, community facilities, housing and the future growth of the town. The following is requested:

- Omit traffic from Main St., Bridge St., Connolly St., and Town Hall St. (to stimulate consumer spend in the town centre).
- Introduce new parking facilities (reference is made to where and what type).
- Let vacated houses within 1 month of tenants leaving.
- Increase the population of Cavan and encourage people to live in Cavan Town
- Provision of sporting facilities for non-nationals.
- Keep Cavan Town clean and tidy

- Attention to all approach roads to Cavan Town.

The submission outlines the benefits of each request. The submission contains an overview of public services and educational and sporting facilities in the town.

Chief Executive's Opinion on Issues Raised

The comments contained in this submission are noted and will be considered as part of the preparation of the Draft Development Plan. The Draft Plan will explore appropriate strategic objectives and policies for the County that will assist in developing the full potential of the County in terms of economic, social and environmental development. Quality of life factors and place-making are increasingly recognised as key to developing attractive places in which to invest, live, visit and work including access to amenities, facilities, arts, culture and heritage. The Draft Plan will encourage appropriate residential, social and community uses within the County to enhance the vitality and viability of the County, in accordance with the principles of good design and to add quality to the places where people live and work. The Draft Plan will aim to ensure the provision of appropriate physical and social infrastructure to facilitate the sustainable economic development growth to the County.

Chief Executive's Recommendation

Sustainable Communities and place-making, including creating attractive places for people to invest, live, work and visit are core themes of the Draft Plan and accordingly will be explored in individual chapters in the Plan. Policies and objectives to support the provision of necessary infrastructure physical and social infrastructure will be explored during the plan making process.

No. 36: Submission from Bryan Gurhy

The submission notes that the following would help contribute to the wellbeing of the inhabitants of Cavan Town;

- Con J. Smith and the track at the side of the Cavan Sports and Leisure Complex should be developed further and upgraded to be safe and properly maintained running/walking tracks which can be used by local communities.
- Further investment in public exercise areas can only add to quality of life, well being of the towns local inhabitants.

Chief Executive's opinion on issues raised

The issues raised in relation to the need for upgraded amenity and exercise areas is noted. The draft Plan will continue to support amenity and exercise areas in our towns and villages.

Chief Executive's Recommendation

The policies and objectives in the draft Plan will facilitate and support the development of upgraded amenity and exercise areas in the County.

No. 37: Submission from John Gurhy

This submission focuses specifically on the Killymooney/Killynebber Lough and the accompanying wetlands and green fields. This submission seeks to ensure the preservation of

these lands and conservation of the character and quality of a unique landscape. Whilst Killynebbber Lough is mentioned in the 2014-2020 Development Plan (Section 5.3.8) as an area of special amenity no mention is afforded to the associated green fields which surround the lough and wetlands. These are part of the local ecosystem and are very important for local biodiversity, natural habitat and act as a 'life corridor' for various wildlife as well as other flora and fauna.

These fields and wetlands are similar to the Green Lough, have a wide selection of animals which are protected under the Wildlife Act 1976 and referenced in Section 5.3.3 of the 2014 Environs Report (CAAS and CCC study on Green Lough). This report identified vegetation species common to both the Green Lough area and Killynebbber wetlands that are unique to an urban centre. Killynebbber has rich vegetation which indicates that it has a wide variety of fish species. Any interruption of the green fields that circumnavigate the wetlands will have a profound negative impact on the lough's ecosystem.

Killynebbber Wetlands is also very important for various bird species. The wetlands and green fields home many migratory wild bird species. Any interruption to this will have a negative effect on these rare and natural habitat. Some of the birds are protected under the Directive 2009/147/EC. The submission seeks that CCC undertake a seasonal ornithology study of the area.

The area around Killynebbber Lough also contributed to the health and well being of local residents and the general population of Cavan Town. The submission notes the need to preserve these diverse natural habitats/wetlands for future generations. The roads surrounding the area of natural beauty are used daily by walkers and runners. The positive contribution this landscape makes to the well being of local area as well as Cavan Town should not be underestimated. The current generation of Cavan Towns people have a responsibility to protect and nurture such a natural assets.

It is requested that CCC protect Killynebbber wetlands and associated green fields and ensure that this areas ecosystem continues to thrive and contribute to Cavan towns sustainable future.

Chief Executive's opinion on issues raised

The issues raised in relation to Killynebbber Lough in noted. There is strong support for the protection of the natural heritage of the County including the lakes, landscape, biodiversity and this will be reinforced in the Draft Plan as they are recognised as key assets in sustaining a high quality of life for the residents of the County.

Chief Executive's Recommendation

The Draft Plan will include policies and objectives which protect the habitats and species of conservation value.

The Draft Plan will continue to protect the County's key environmental assets by implementing an environmental protection policy.

No. 38: Submission from Marietta O'Dowd

The submission requests the following:

- Visual improvements to commercial business and industrial business parks on Cavan to Moynehall: Tractamotors, Riverside Industrial Park, Lidl and all other commercial

- businesses and places. The submission details a number of suggestions including options for landscaping, seating, lighting, walking/cycling facilities and river bank amenity area.
- A roundabout or traffic lighting at the Ballyjamesduff turn off.
- Safety measures, signage and improvement works at the lane entrance to Upper Derries (H12VK00).

Chief Executives Opinion on Issues Raised

The Draft Plan will aim to ensure the provision of appropriate physical and social infrastructure to facilitate the sustainable economic development of the County. Quality of life factors and place-making are increasingly recognised as key to developing attractive places in which to invest, live, work and visit including access to amenities, facilities, heritage, etc. The Draft Plan will encourage appropriate development and the enhancement of existing development to enhance that vitality and viability of the County, in accordance with good principles of design and to add to the quality of the places where people live and work.

Chief Executive's Recommendation

The Draft Plan will explore appropriate strategic objectives and policies for the County that will assist in developing the full potential of the County in terms of economic, social and environmental development. The Draft Plan will strengthen policy on public realm for open spaces, streets, etc and support the development and implementation of improvement schemes on a county wide basis.

No. 39: Submission from Colette Bogue

This submission was made by Wynne, Gormley, Gilson Architects & Surveyors Ltd. on behalf of Colette Bogue. The submission relates to the Creighan/Ashbrooke/Burges Acres/Moynehall area of the Cavan Town Environs. A map accompanies the submission conveying the said area. The submission is divided into 5 headings noting the following:

Potential for Economic & Social Development

The submission describes this area as a developing suburb of Cavan Town noting the existing commercial, industrial, retail and community and recreational facilities of the area. It is stated that this area should have more emphasis to support a mix residential development and low density designation. The submission outlines how such a development would benefit the area. The submission also notes that considering the current rural housing policy, there should be an emphasis on providing serviced sites to cater for one of type residential units to allow people serviced sites who cannot comply with rural housing policy.

Population Strategy for Cavan Town

The submission notes that there is a lack of new houses being built by private developers in the Cavan Town area due to viability and cost issues. It is further noted that this location and position is a more viable option for developers in terms of access to services and amenities already in place.

Integration with Existing & Future Developments

The submission requests the provision for a greenway/walkway along the Cavan River to Breffni Park and to the future new sporting facility to form part of any future development in this area.

Road Link

The submission states that a link road from the Ballinagh Rd to Kilnavara should form part of the development strategy for this area, outlining this would be more than likely developer driven. The benefits of this road are also highlighted.

Community Facilities

The submission notes there is a lack of community facilities in the Moynehall and Creighan area and requests the plan includes for the provision of a community centre with sporting facilities.

Chief Executive's opinion on issues raised

The issues raised in relation to the need for sustainable communities in the Moynehall area are noted. The review of the Cavan Town and Environs Development Plan 2014-2020 aims to include objectives and policies for the delivery of sustainable communities in the Cavan Town and Environs area. Strategic road links will be included in the Local Area Plan for the Cavan Town and Environs area and the delivery of lands for residential use alongside community and amenity facilities will be carried out in accordance with the Core Strategy for the county.

Chief Executive's Recommendation

That the draft plan considers housing need, transport, amenity and recreational facilities in the zoning of lands in accordance with the Core Strategy of the County Development Plan.

No. 40: Submission from Edward O'Hanlon

This submission requests that consideration be given to upgrading and expanding the Con Smith Memorial Park to include walking/running tracks, sports playing fields and picnic areas. It is also noted in the submission that Cavan Town would greatly benefit from the provision of additional outdoor public facilities. It is suggested that this type of development would attract people into Cavan Town and would have a positive impact on the quality of life for the residents of Cavan town and its environs and for local businesses.

Chief Executive's Opinion on issues raised

The issues raised in relation to the need for upgraded amenity and exercise areas are noted. The Draft Plan will aim to deliver sustainable communities and to promote a high quality of life for the people of Cavan by leading economic and community development and ensuring a supportive physical and social infrastructure is developed. The social, community and economic benefits from improving the tourism and recreational offer within the County is recognised and acknowledged. The development of such facilities will be promoted in the Draft Plan.

Chief Executive's Recommendation

Policies and objectives to support the provision of sport, tourism, amenity and recreational facilities in the County will be explored during the plan making process.

No. 41: Submission from Tod Davis

This submission relates to traffic management at the “Tractamotors” junction in Cavan town. The submission requests that a strategic objective be included in the Draft Plan relating to the upgrade of traffic management and control at the Tractamotors junction. The submission outlines why this is required. A historical note and reference to the Strategic Issues Paper also forms part of the submission.

Chief Executive’s Opinion in Issues Raised

The Draft Plan will aim to deliver a high quality of life for the people of Cavan by leading economic and community development and ensuring a supportive physical and social infrastructure is developed. Specific comments made relating to infrastructure are noted and will be considered during the preparation of the Draft Plan

Chief Executive’s Recommendation

Policies and objectives to support the provision of necessary infrastructure will be explored during the plan making process.

No. 42: Submission from Philip Brady

The submission relates to lands and back gardens behind the properties on the west side of Farnham Street, Cavan Town, noting this is an area for future development. The submission includes a sketch site layout plan.

The submission notes the basements of Nos. 23, 25 and 27 have been under a flooding risk since 1990 and cannot be used to potential. It is stated that the re-instatement of Boyle’s Lough or a lake be created in Con Smyth Park Environs to act as attenuation for the Kinnypottle River.

It is further noted that there has been a huge increase in surface water discharging into the Kinnypottle in the last 20 years with no attenuation measures undertaken.

Chief Executive’s Opinion on Issues Raised

Specific comments made relating to infrastructure are noted and will be considered during the preparation of the Draft Plan and Local Area Plan for Cavan Town and Environs. A key theme in the local area plan review is the sustainable renewal and the future growth of Cavan town centre. The Draft Local Area Plan will address this in considerable detail.

Chief Executive’s Recommendation

The Draft Plan will explore specific policies and objectives for Cavan Town as part of the Local Area Plan. These policies and objectives will assist in developing the full potential of the town in terms of economic, social and environmental development.

No. 43: Submission from Bridget Booyen

This submission outlines a range of social and community infrastructure required in the County, stipulating reasons why these services are necessary. Reference is made to Care and Nursing Homes, special needs educational and health facilities. The requirement to provide more secure housing for the aged and vulnerable is also highlighted. The submission notes that traffic calming

measures are required at the Tractamotors junction in Cavan Town. The submission also outlines a number of physical improvements and service provisions that are required around Cavan Town. It is suggested that all towns and villages should adapt a pledge. A pledge example is included in the submission.

Chief Executive's Opinion on Issues Raised

The Draft Plan will aim to develop sustainable communities and to promote a high quality of life for the people of Cavan by leading economic and community development, and ensuring a supportive physical and social infrastructure is developed, in the interests of the sustainable development of the County. A Housing Strategy will be prepared in accordance with the requirements of Part V of the Planning and Development Act 2000 (as amended). This will set out the evidence base for the overall framework upon which housing land requirements will be based to meet the housing needs arising in the County. This will include an assessment of the housing requirements of the different categories of households, including the requirements of elderly persons and persons with disabilities.

Chief Executive's Recommendation

The importance of adequate physical and social infrastructure in the County is recognised. The Draft Development Plan through appropriate policies and objectives will aim to protect and enhance the physical and social infrastructure in the County. A key theme in the plan review is the sustainable renewal of our towns and villages and the Draft Plan will address this matter in considerable detail. Policies and objectives within the Draft Plan will be in accordance with the findings of the Housing Strategy and it is recommended that they seek to appropriately address the housing requirements in the County.

No. 44: Submission from Niamh Brady

The submission relates to Cavan Town and contains a number of suggestions with rationale as to how the physical fabric of the town could be improved. The submission comments and puts forward suggestions relating to infrastructure, public realm and particular development areas detailing specifics of each proposal. The submission suggests:

- Every 4 years give the property owners a reduction in their rates to allow them invest the money into the physical fabric of their building.
- Prepare a Masterplan for further development and upgrade of the Dublin Rd area (Breffni Park to Fresh Today).
- Redevelopment of Market Square
- New signage scheme for Mains St.
- Improve the retail offer of Cavan town to encourage increase in footfall.
- Infrastructural improvements on Farnham Street.
- Roundabout at Tractamotors
- Provision of art work on all roundabouts
- Pedestrianise streets to create character.

Chief Executive's Opinion on Issues Raised

Specific comments relating to Cavan Town are noted and will be considered during the preparation of the Draft Plan. A key theme in the plan review is the sustainable renewal of our towns and villages and the Draft Plan will address this matter in considerable detail. The Draft Plan will aim to develop sustainable communities and to promote a high quality of life for the people of Cavan by leading economic and community development, and ensuring a supportive physical and social infrastructure is developed. Quality of life factors and place-making are increasingly recognised as key to developing attractive places in which to invest, live, visit and work including access to amenities, facilities, arts, culture and heritage. The Draft Plan will strengthen policy on public realm for open spaces, streets and areas enjoyed by the public and support the development and implementation of schemes on a county wide basis. This should include enhancements in existing areas and new schemes. The creation of qualitative public spaces and safe and attractive spaces will be important in designing the public realm within development.

Chief Executive's Recommendation

Sustainable Communities and place-making, including creating attractive places for people to invest, live, work and visit are core themes of the Draft Plan and accordingly will be explored in individual chapters in the Plan. The policies and objectives in the existing County Development Plan relating to issues such as design, layout, open space, height etc will be reviewed during the preparation of town and villages plans. The Draft Plan will strengthen policy on public realm for open spaces, streets, etc and support the development and implementation of improvement schemes on a county wide basis. The Draft Plan will support the appropriate provision of physical and social infrastructure.

No. 45: Submission from Malachy and Felicity O'Brien

The submission relates to Cavan town and requests a number of improvements to the physical fabric of the town, the submission outlines additional details and benefits for each proposal:

- Enhance the approach from the Dublin Rd. into the town
- Improve advertising and parking facilities at the Green Lake
- Preserve and revamp Mons Terrace and St. Aidans Terrace
- Provision of covered meeting and seating area in the town centre
- Utilise abandoned/derelict houses to provide social and affordable housing
- Maintain and decorate vacant houses and premises in the town centre.
- Consider the provision of retirement villages for the ageing population.
- More major retailer, other than grocery, to attract additional footfall into the town centre.
- Local shop owners and staff to counteract the online shopping trend and make shopping a more enjoyable experience.
- Increase tax on all online purchases.
- Revisit current parking charges in the town and introduce one day a week free car parking
- Facilitate a bigger variety of music events and drama throughout the year in Cavan Town Hall.
- Revisit the policy of decentralisation of government departments to county towns
- Extend the motorway to Cavan town.

- Maintain the status of Cavan General Hospital.

Chief Executive's opinion on issues raised

The issues raised in relation to the suggested improvements to Cavan Town and Environs area are noted. CCC is aware of the important role that Cavan Town plays in the overall settlement strategy of the County. In this regard a new Local Area Plan for the Cavan Town and Environs Area will be prepared.

Chief Executive's Recommendation

That the Local Area Plan for Cavan Town and Environs area will support the towns growth and encourage re-development of the town core with suitable and sustainable uses.

Sustainable Communities and place-making, including creating attractive places for people to invest, live, work and visit are core themes of the Draft Plan and accordingly will be explored in individual chapters in the Plan. The Draft Plan will ensure the timely provision of infrastructure, community services and amenities required for the creation of sustainable communities. The Draft Plan will aim to make Cavan a well-designed county with an attractive rural and urban environment and a better place for people to live, work and visit.

No. 46: Submission from Bart

The submission requests that the street drain system is unblocked. The provision of additional bind on the streets is also requested.

Chief Executive's Opinion on Issues Raised

Specific comments made relating to infrastructure are noted and will be considered during the preparation of the Draft Plan.

Chief Executive's Recommendation

Policies and objectives to support the provision of necessary infrastructure will be explored during the plan making process.

No. 47: Submission from Ruth King

This submission outlines a number of suggestions/initiatives to enhance the recreational offer of the Killykeen. This submission requests the following:

- A campsite/glamping site beside the lake with a covered BBQ/party area. It is noted this site could run from Easter to Halloween in-addition to kiddies camping parties.
- Row boat and kayak hire
- Inflatable village (Hudson Bay Hotel is noted as one that is always full)
- Nature summer camps
- Eco trails
- Fishing demonstrations where supply companies could host an event day to showcase their equipment.
- Fishing competitions
- Kids play area and eco themed activities made from wood

- School trips from early spring
- Outdoor art exhibitions
- A bandstand to facilitate music in the park
- A restaurant with a soft play area for kids (reference to made to a similar restaurant in the pool at Salthill).

Chief Executive's Opinion on Issues Raised

The social, community and economic benefits from improving the tourism and recreational offer within the County is recognised and acknowledged. The development of tourism, sport, recreational facilities and community-related projects will be promoted in the Draft Plan.

Chief Executive's Recommendation

Policies and objectives to support the provision of tourism, amenity and recreational facilities in the County will be explored during the plan making process.

3.4 Virginia Submissions

This section contains a summary of the written submissions received as part of the Pre Draft consultation phase, relating to Virginia. The opinions and recommendations of the Chief Executive to the issues raised within are also included.

No. 48: Submission from Virginia Residents Facebook 1

The submission was made by Helen Rahill on behalf of Virginia Residents Facebook Group which has 822 members. It outlines a number of requests with specific proposals relating to enterprise and employment, transport and infrastructure, natural and built heritage, tourism and arts, community facilities and environment. The submission also includes a PDF document outlining what a Business and Wellness Centre in Virginia could be. The submission requests:

Enterprise and Employment

- IT/Digital/Business Co Working Space/Incubation centre/small business centre/training facilities/wellness facility
- Food Business Facilities
- Manufacturing Facility
- Logistics Centre

Transport and Infrastructure

- By-pass
- Car Parks
- Local Link Bus
- Town Courtesy Bus

- Speed Limits on approach roads to town
- Cycle and pedestrian routes into the town

Natural and Built Heritage Tourism and Arts

- Lake walks
- Develop Lislea Bog
- Forest school
- Restore the Fever Hospital into a Heritage Centre
- Rebuild Ladies Cottage in Deerpark Forest
- Outdoor hand washing stations
- Public Toilets at public amenities
- Water refill stations
- Eco friendly bins

Tourism and Arts

- Develop activities and walks around the lake
-

Community Facilities

- Civic Centre and Library
- Leisure Centre
- Swimming Pool
- Retirement housing

Environment

- Zero waste shop/eco/organic
- Bins for lake and forest areas
- Community waste facility
- Community garden and orchard
- Wild flowers in public areas
- Redevelopment of derelict buildings in the town

Chief Executive's Opinion on Issues Raised

The comments contained in this submission are noted and will be considered as part of the preparation of the Draft Development Plan. The Draft Plan will explore appropriate strategic objectives and policies for the County that will assist in developing the full potential of the County in terms of economic, social and environmental development. The promotion of economic development in Cavan is a key corporate goal of Cavan County Council. The Draft Plan will continue to support and facilitate economic development at appropriate locations throughout the County. The Draft Plan will seek to work collaboratively with key stakeholders and businesses to achieve this goal. The Draft Plan will promote the growth and vibrancy of the town centres of the County, by providing for a mix of uses in these areas, including employment and social uses, and resist the loss of residential uses.

Quality of life factors and place-making are increasingly recognised as key to developing attractive places in which to invest, live, visit and work including access to amenities, facilities, arts, culture and heritage.

The importance of community facilities in the County is recognised and it will be essential to protect and expand such facilities through appropriate policies and objectives.

The Draft Plan will strengthen policy on public realm for open spaces, streets and areas enjoyed by the public and support the development and implementation of schemes on a county wide basis. The creation of qualitative public spaces and safe and attractive spaces will be important in designing the public realm within development.

The Council recognises the value of walking routes in the county. Potential for walking routes will be explored as part of the preparation of the Draft Plan.

Chief Executive's Recommendation

Policies and objectives within the Draft Plan will be in accordance with the findings of the Housing Strategy and it is recommended that they seek to appropriately address the housing requirements in the County. The Housing Strategy is required to provide for different housing needs, including social and affordable housing, sheltered housing and housing for persons with disabilities and the elderly.

The Draft Plan will support and facilitate the development and expansion of community infrastructure as appropriate and within resources available.

Sustainable Communities and place-making, including creating attractive places for people to invest, live, work and visit are core themes of the Draft Plan and accordingly will be explored in individual chapters in the Plan.

The Draft Plan will ensure the timely provision of community services and resources, including open space, schools, community facilities, amenities, culture and heritage required for the creation of sustainable communities.

The Draft Plan will continue to protect the County's key environmental assets by implementing and environmental protection policy which recognises the various environmentally sensitive areas and Natura 2000 sites within the County.

The Draft Plan will consider options to utilise the natural amenity areas such as the lakes, canals, etc of Cavan, as national and international tourist destinations and will be supported in a sustainable manner.

The Draft Plan will continue to protect, conserve and manage the County's cultural and archaeological heritage.

No. 49: Submission from Virginia Development Association c/o Mags Matthews

The submission relates to Virginia. It outlines a number of requests with specific proposals relating to enterprise and employment, transport and infrastructure, heritage, tourism, community facilities and amenities. The submission elaborates and notes benefits for each request.

Chief Executive's Opinion on Issues Raised

Quality of life factors and place-making are increasingly recognised as key to developing attractive places in which to invest, live, visit and work including access to amenities, facilities, arts, culture and heritage. The Draft Plan will encourage appropriate residential, social and community uses within the County to enhance the vitality and viability of the County, in accordance with the principles of good design and to add quality to the places where people live and work.

Chief Executive's Recommendation

Sustainable Communities and place-making, including creating attractive places for people to invest, live, work and visit are core themes of the Draft Plan and accordingly will be explored in individual chapters in the Plan.

No. 50: Submission from Kathleen Duffy

This submission requests the provision of a community creche facility in Virginia stating a number of reasons for this requirement. The submission also states that more attention should be given to rural Cavan and notes that there is no footage of agriculture/farming activities in the consultation video. It is suggested that Cavan County Council should start developing agriculture tourism in the county. The submission elaborates on this point outlining what this could include and the benefits for the county.

Chief Executive's Opinion on Issues Raised

The importance of community facilities in the County is recognised. The development of such facilities will be promoted in the Draft Plan. The Draft Plan will aim to develop sustainable communities and promoting a high quality of life for the people of Cavan by leading economic and community development, and ensuring a supportive physical and social infrastructure is developed, in the interests of the sustainable development of the County.

Chief Executive's Recommendation

The Draft Plan will include policies and objectives to support the timely provision of community services and resources required for the creation of sustainable communities. The Draft Plan will contain policies and objective to support the continuing viability of agriculture and other rural based enterprises in a controlled and sustainable manner.

No. 51: Submission from James Kellett

1.0 Introduction and Summary

This submission was made by The Planning Partnership on behalf of James Kellett. The submission relates to Virginia.

1.1 Rationale of the Submission – Virginia “Self Sustaining Growth Town”

The submission states that James Kellett is a significant land owner in Virginia and acknowledges that this consultation phase does not consider zoning requests. The submission also states that it is integral that the planning authority are informed of the willingness of landowners to engage in active land management, an integral and crucial factor in enabling the spatial consideration of the consideration and growth of Virginia.

1.2 Key Issues Identified – Summary Submission

The submission includes a number of key issues for the future sustainable development of Virginia:

1. Statutory requirements under Section 10 of the *Planning and Development Act 2000-2019 (as amended)*
2. Statutory requirements under the *Local Government Reform Act 2014, Urban Regeneration and Housing Act 2015* and the *Planning and Development Amendment Act 2018*
3. Compliance with policy and objectives of the National Planning Framework and the Regional Spatial and Economic Strategy
4. Increased importance on the “Town” as a sustainable model of development
5. Renewing and invigorating towns in a sustainable manner to become “important service centre” and “focal points for development”
6. Ministerial Guidelines and policy documents including: *Rebuilding Ireland, Housing Options for our Ageing Population* and *A Framework for Town Centre Renewal*.

It is stated that the submission seeks to support Virginia as a self-sustaining growth town in the county and region.

The submission notes that Virginia can provide for growth associated with existing community and infrastructural assets which require inward investment to support the sustainable use of resources and the expansion of the town to provide for the best use of scarce land resources and as to avoid the dispersed and uneconomic use of resources such as single site isolated rural housing policy which undermines inward investment and consolidated resources.

The submission states there is a need to focus on population centres and sustainable resources and associated community and infrastructural provision to allow for the consolidation and growth of our towns in an economic way and enable more sustainable modes of travel such as active transportation such as walking and cycling whilst also ensuring the best use of the national transport infrastructure associated with road, rail and bus services.

The submission notes the strategic location of the town.

2.0 Strategic Policy Context

2.1 National Planning Framework 2040

The submission includes the following policy objectives: NPO 5, NPO 6, NPO 7, NPO 8, NPO 9, NPO 16, NPO 18a, NPO 18b, NPO 27, NPO 30, NPO 72a.

The submission also details Appendix 3 – A Methodology for a Tiered Approach to Land Zoning, Tier 1: Services Zoned Land and Tier 2: Serviced Zoned Land and notes the key components of both.

2.2 Regional Spatial and Economic Strategy 2020-2032 – NWRA

The submission includes the following policy objectives: RPO 3.1, RPO 3.2, RPO 3.4, RPO 3.9, RPO 3.13, RPO 7.17, RPO 7.19.

2.3 Relevant Ministerial Guidelines & Policy Directives

The submission contains the title page and section relating to Aging Population of the following guidelines and directives: Action Plan For Housing and Homelessness Rebuilding Ireland, Housing Options for Our Aging Population Policy Statement and A Framework for Town Centre Renewal.

The submission also gives details of the population cohort of Virginia. The submission also notes that analysis shows that the +55 group are presenting the greatest housing need and it is further noted that this scenario and cohort will continue to grow as life expectancy levels increase.

It is stated that the development plan process presents an opportunity to “Advance Plan” rather than retrofit such facilities within the spatial planning process. It is requested that that spatial planning needs of the aging population are advised to be taken into account by the referred documentation. It is further notes that this submission presents the opportunity to meet the key principles for supporting housing for an ageing population.

The Planning Partnership believe that such national policy (Housing Option for our Aging Population) should form a central consideration of the development plan process to future proof the specific housing needs of a growing ageing population. The submission conveys key elements of this policy statement which highlight the growing needs and demands for housing options and availability for an ageing population. It also contains a graph showing the projected population by age range 2031 and lists key actions to deliver.

3.0 Virginia – “Self Sustaining Growth Town”

The submission notes Virginia’s current Tier 2 status and suggested Self-Sustaining Growth Town status noting that Virginia will need to match demands for growing and emerging population demands and in particular the full range of housing required for the elderly, active retired through to full residential care.

The submission states that it is of growing importance that our aged rural isolated have a necessary and emerging demand to orientate towards good community services and service centre provision where investment in infrastructure and resources can be focussed economically and viably.

3.1 The Creation of a Specific Local Objective for Self-Sustaining Growth Town

The submission notes that there will be strategic requirements for consolidated land holdings close to and within our settlements that provide the range of housing options as will demanded by our ageing population and our Plans require Future-Proofing in this context.

It is noted that the intention of the submission is to present that there are landowners who are willing to engage in active land management opportunities to resolve this housing trend and demand and will not necessarily undermine zoning provisions for residential lands locally and the consolidated approach to same in particular the Housing Options for Our Ageing Population.

The submission requests that there is potential to introduce or accept the approach of potential specific local objectives relating to the provision of housing for an ageing population.

The submission suggests that to overcome any potential conflict with the core strategy, it is requested to include a Specific Local Objective which would allow for the specific development of retirement accommodation. It is submitted that an SLO would properly reflect intentions of the non standard housing elements of the proposed residential development.

It is stated in the submission that the form and type of residential development would encompass residential care combined with assisted and independent living. It is submitted that the presence of a specific local objective in all plans (not just Virginia) would present a suitable opportunity to allow same and does not undermine the projections and objectives of the Development Plan Core Strategy.

Recommendation

The submission notes that the Draft Cavan County Development Plan needs to take account of “older people” and their growing influence on our spatial planning and housing requirements. The submission suggests the following Plan Objectives as included:

- Older people have a range of housing needs relating to access, medical care, security and personal safety amongst other issues. Dwellings and other residential facilities catering specifically for older people should be located in close proximity to convenience shop facilities and public transport nodes. There is a move away from traditional nursing home care to a “semi-supported” or “assisted living” concept which is considered a preferred option for many older people as it enables them to continue to live relatively independently in their own homes.
- For those who wish to continue to live independently, it is important that the opportunity exists to trade down or downsize in the area in which they live. Assessment of housing mix needs to consider this in appropriate developments and locations.
- Virginia is well located within the national road network and has a strong area of rural influence and where similar cohorts of rural dwellers (an ageing population) in more isolated locations will present a demand to gain access to suitably located and accessible older housing models.
- This plan objective is also aimed at giving older people, especially those living in rural isolation, the option of moving to a community setting where they can live independently rather than in nursing homes.

4.0 Concluding Comments

The submission concludes with the following comments:

That the emerging housing crisis represents a significant emerging strategic housing supply side issue.

The real and demonstrable needs of our ageing populations need to be future proofed in a planned and co-ordinated manner and associated with “connected and sustainable communities”.

The submission is made to encourage and highlight the important role that Virginia plays and to promote the positive benefits in the interests of climate change, active transportation and sustainable development to enable the designation of Virginia as a Self-Sustaining Growth Town.

The evidence-based approach to assessing emerging housing needs as predicted by CSO and the *Housing Options for Our Ageing Population, DHPLG Policy Statement – 2019* requires due cognisance and will build on existing infrastructural investment to date in Virginia. It is also noted that this strategic consideration will enable and promote sustainable development providing for a “plan-led” system, where security of decision making can be informed and to enable consolidated investment decisions by both public and private sectoral bodies.

There is currently an asset-rich environment of services, amenities, retail areas and road networks within Virginia. There is also excellent linking footpath networks and as provide for “active transportation” alternatives to the private car.

The asset rich and active transport rich environment will assist in the necessary reduction in fossil fuel usage currently promoted by long-distance commuting and car-generated travel which will need to be matched and replaced by the State’s commitment to the EU Climate Change Accords.

It is requested that Cavan County Council would include Virginia as a *Self – Sufficient Growth Town* as this will align more accurately with the National Planning Framework 2040 and the Regional Spatial and Economic Strategy 2020-2032 – NWRA.

It is noted that this submission is presented as “strategic” in nature and not “site-specific”, it is integral to note that the landowner is willing to engage in “active land management” opportunities in transitioning of Virginia and its predicted role and growth for the proper and consolidated spatial planning of the Town.

Chief Executive’s Opinion on issues raised

The Draft Plan will include an evidence based Core Strategy which places a statutory obligation on planning authorities to ensure that sufficient land is zoned to meet housing requirements over the plan period. The population targets, settlement hierarchy and densities for the County will be based on the NPF and the RSES. The Draft Plan will incorporate age friendly policies and objectives, in particular in relation to housing, amenities, access, etc to serve this important and increasing cohort of our population.

Chief Executive’s Recommendation

The Core Strategy will set out a medium to longer term strategy for the spatial development of the County identifying the quantum, location and phasing of proposed development.

Policies and objectives within the Draft Plan will be in accordance with the findings of the Housing Strategy and it is recommended that they seek to appropriately address the housing requirements in the County. The Housing Strategy is required to provide for different housing needs, including social and affordable housing, sheltered housing and housing for persons with disabilities and the elderly.

The Draft Plan will also explore policies and objectives that seek to provide a mix of units, where are flexible in design and can adapt to the changing requirements of family life cycles.

No. 52: Submission from Edel Barry

The submission focuses on Virginia Town and relates to amenity and community facilities. The submission puts forward a number of specific proposals for same and requests the inclusion within the Draft Plan including; public toilets and hand washing facilities next to outdoor amenity

areas, drinking water fountains, outdoor play spaces and amenities, a fire pit circle, an outdoor amphitheatre, a community garden, a community creche and mini basketball courts. The submission notes the benefits of each request and outlining each rationale.

Chief Executive's opinion on issues raised

The importance of community facilities in the County is recognised and it will be essential to protect and expand such facilities through appropriate policies and objectives. Quality of life factors and place-making are increasingly recognised as key to developing attractive places in which to invest, live, visit and work including access to amenities, facilities, arts, culture and heritage. The Draft Plan will aim to develop sustainable communities by promoting a high quality of life for the people of Cavan by leading economic and community development. The Draft Plan will facilitate the development of supportive physical and social infrastructure as appropriate and as resources allow. The Draft Plan will strengthen policy on public realm for open spaces, streets and areas enjoyed by the public and support the development and implementation of schemes on a county wide basis. This should include enhancements in existing areas and incorporation into new schemes. The creation of qualitative public spaces and safe and attractive spaces will be important in designing the public realm within development.

Chief Executives Recommendation

Sustainable Communities and place-making, including creating attractive places for people to invest, live, work and visit are core themes of the Draft Plan and accordingly will be explored in individual chapters in the Plan. The Draft Plan will ensure the timely provision of infrastructure, community services and amenities required for the creation of sustainable communities. The Draft Plan will aim to make Cavan a well designed county with an attractive rural and urban environment and a better place for people to live, work and visit.

No. 53: Submission from S Brady

The submission requests enhanced measures to protect Cavan's built heritage be introduced as part of the Development Plan. Specific reference is made to The Famine/Fever Hospital in Virginia and it is requested its addition to the List of Protected Structures. The submission gives an overview of this building and its importance and potential future development. It is noted that this building is already recorded on the National Inventory of Architectural Heritage and a full description is included as part of the submission.

Chief Executive's Opinion on issues raised

It is recommended that policies and objectives are included within the Draft Plan which seek to protect, conserve and promote the County's Built, Natural and Cultural heritage sites.

Chief Executive's Recommendation

The Draft Plan will continue to protect, conserve, promote and manage the County's natural, cultural and built heritage in a sustainable manner.

3.5 Bailieborough Submissions

This section contains a summary of the written submissions received as part of the Pre Draft consultation phase, relating to Bailieborough. The opinions and recommendations of the Chief Executive to the issues raised within are also included.

No. 54: Submission from Cllr. Paddy Mc Donald

The submission relates to Bailieborough town. The submission outlines a rationale for the requirement of the following:

- Extension of the car park at the back of the Main St
- Additional lands for housing development
- A walkway around the town lake

The submission also notes the amount of derelict buildings in our towns and their negative impact.

Chief Executive's Opinion on issues raised

The provision of car parking in town centres will be reviewed during the Draft Plan process.

CCC is aware of the current pressures in the housing market and of the critical need for the rapid delivery of housing units. The Draft Plan will include a Core Strategy which places a statutory obligation on planning authorities to ensure that sufficient land is zoned to meet the housing requirements in the County.

The Draft Plan will continue to promote walking and cycling through the provision, upgrading and maintenance of cycleways and footpaths as resources allow; and ensure that connectivity is provided in new developments with the provision of good pedestrian and cycle network and facilities.

Chief Executive's Recommendation

The Draft Plan will facilitate and support the development of Cavan as a premier location for outdoor recreational activities including walking and cycling.

Car parking standards will be reviewed in Town Centres in the Draft Plan.

Policies and objectives within the Draft Plan will be in accordance with the findings of the Housing Strategy and it is recommended that they seek to appropriately address the housing requirements in the County.

No. 55: Submission from Bailieborough Development Association Ltd c/o Lee Mc Donnell, Manager BDA

The submission outlines a number of requests concerning infrastructure, employment and amenity provision for the town of Bailieborough. The submission includes a rationale for each request. Requests includes:

- Cavan County Council to secure old industrial sites for future industrial development.
- Resign Main Street.
- Virginia bypass to finish on the Bailieborough side
- Develop Office Pods for remote workers
- Develop amenities around the lakes and forests/outdoor learning areas
- Improve roads to walking trails around the town.
- Ensure High Speed Broadband is available to all.

Chief Executive's Opinion on Issues Raised

The Draft Development Plan will seek to continue to support and facilitate economic development at appropriate locations throughout the County. The Draft Plan should continue to promote walking and cycling through the provision, upgrading and maintenance of cycleways and footpaths as resources allow; and ensure that connectivity is provided in new developments with the provision of good pedestrian and cycle network and facilities. It is acknowledged that the provision of high quality broadband is essential for preventing isolation and social exclusion. Broadband access is recognised as critical to economic development and a high quality service to both urban and rural areas is a key infrastructural requirement. The Council is supportive of the delivery of key pieces of infrastructure required including specifically the Virginia bypass. It is intended that policies and objectives supporting these projects will be included in the Draft Plan.

Chief Executive's Recommendation

The Draft Development Plan will continue to promote the development of high capacity Information Communications Technology Infrastructure, broadband connectivity and digital broadcasting in the interests of economic progress and the proper planning and sustainable development of the county. The Draft Plan will facilitate and support the development of Cavan as a premier location for outdoor recreational activities including walking and cycling. The Draft Development Plan will promote the growth and vibrancy of town centres, by providing a mix of uses, including employment and social uses, and resist the loss of residential uses.

No. 56: Submission from Hugh Brady

This submission relates to Bailieborough town, a Tier 2 large town in the current settlement hierarchy. This submission indicates that opportunities exist on underutilised serviced lands within the present development boundary of Bailieborough to provide for much needed future development of housing. The town is serviced by public transport routes and provides for local services and places of employment that could easily cater for new residential development. The continued future development and sustainable growth of Bailieborough is essential to create a positive place to reside and progress the town into the future.

Chief Executive's opinion on issues raised

The issues raised in relation to the need for sustainable development of Bailieborough are noted.

The sustainable development of Bailieborough and other settlements of the county will be a core aim of draft Plan.

Chief Executive's Recommendation

That the settlements of County Cavan are set out for sustainable development in the Core Strategy of the draft Development Plan.

No. 57: Submission from The Planning Partnership on Behalf of Donal Clarke

Owner seeks to engage in ‘active land management’ as an integral and crucial factor in enabling the spatial consideration of the consolidation and future planned growth of Bailieborough.

There are a number of key issues that influence the future sustainable development of Bailieborough.

Statutory requirements: Core Strategy Consistency with RSES, requirement for town to be classified under the ‘Settlement Hierarchy’ and the role and function is consistent with projecting populations.

Plan needs to be consistent with NPF and RSES.

- importance of the town as a sustainable model of development
- renewing and invigorating towns in a sustainable manner to become important service centres to their rural environs and become focal points for development.
- New Ministerial Guidelines and Policy Documents – Rebuilding Ireland, Housing Options for Our Aging Population and A Framework for Town Centre Renewal.

Bailieborough can provide for growth associated with existing community and infrastructural assets.

The submission includes extracts from the following policy documents indicating how the growth of Bailieborough is in compliance with each of the said documents. These documents include the NPF, the RSES, the Cavan County Development Plan 2014-2020, Ministerial Guidelines and Emerging Policy Context.

Asset Test

Donal Clarke has engaged the services of Cooney Architects to assist in the evidence based approach to plot available community and infrastructure assets. A number of opportunity sites are within 500 metres of Bailieborough town centre. The submission encourages CCC to channel Active Land Management functions and Rural and Urban Regeneration Initiatives and funding packages to inform the growth and consolidation of town centres like Bailieborough.

It is respectively suggested that CCC would include Bailieborough as Self Sufficient Growth Town within the hierarchy for the Draft Cavan County Development Plan 2022-2028 as this will align more accurately with the NPF 2040 and the RSES 2020-2032.

Chief Executive’s opinion on issues raised

The issues raised in relation to the need for sustainable development of Bailieborough is noted.

The sustainable development of Bailieborough and other settlements of the county will be a core aim of draft Plan.

Chief Executives Recommendations

That the settlements of County Cavan are set out for sustainable development in the Core Strategy of the draft Development Plan.

No. 58: Submission from Anne Marie Smith

This submission relates to Bailieborough town and the surrounding area.

The submission describes elements of the physical fabric and gives suggestions as to how these can be improved, including: upgrading of footpaths, improved access for all users, better links between amenities and the town centre, derelict/vacant buildings, traffic calming measures and parking provision in the town. It is also suggested to develop the town lake as a water sport centre.

Chief Executive's Opinion on issues raised

The comments made in relation to Bailieborough are noted and will be considered as part of the Draft Plan. The importance of community facilities in the County is recognised and it will be essential to protect and expand such facilities through appropriate policies and objectives. Quality of life factors and place-making are increasingly recognised as key to developing attractive places in which to invest, live, visit and work including access to amenities, facilities, arts, culture and heritage. The Draft Plan will aim to develop sustainable communities by promoting a high quality of life for the people of Cavan by leading economic and community development. The Draft Plan will facilitate the development of supportive physical and social infrastructure as appropriate and as resources allow. The Draft Plan will strengthen policy on public realm for open spaces, streets and areas enjoyed by the public and support the development and implementation of schemes on a county wide basis. This should include enhancements in existing areas and incorporation into new schemes. The creation of qualitative public spaces and safe and attractive spaces will be important in designing the public realm within development.

Chief Executive's Recommendation

Sustainable Communities and place-making, including creating attractive places for people to invest, live, work and visit are core themes of the Draft Plan and accordingly will be explored in individual chapters in the Plan. The Draft Plan will ensure the timely provision of infrastructure, community services and amenities required for the creation of sustainable communities. The Draft Plan will aim to make Cavan a well designed county with an attractive rural and urban environment and a better place for people to live, work and visit.

3.6 Ballyjamesduff Submissions

This section contains a summary of the written submissions received as part of the Pre Draft consultation phase, relating to Ballyjamesduff. The opinions and recommendations of the Chief Executive to the issues raised within are also included.

No. 59: Submission from Pat Connolly

The submission relates to Ballyjamesduff, a Tier 2 large town within the county, submission has identified and is promoting an opportunity that exists to the west of Ballyjamesduff to extend the development boundary for future development for housing employment to cater for population increase. The submission notes that the town provides many local services, places of employment and its continued future development and sustainable growth is essential to create a positive place to reside and progress the town into the future.

Chief Executive's opinion on issues raised

The issues raised in relation to the need for sustainable development of Ballyjamesduff is noted.

The sustainable development of Ballyjamesduff and other settlements of the county will be a core aim of draft Plan.

Chief Executive's Recommendation

That the settlements of County Cavan are set out for sustainable development in the Core Strategy of the draft Development Plan.

No. 60: Submission from Ballyjamesduff Unity Group

The submission gives an overview of the role of a group, who they represent, and tasks achieved to date. Reference is made a needs analysis carried out whereby 70% of respondents indicated the need for more social interaction and social activities. An additional survey was also carried out by the group which conveyed the need for community facilities in the area. The submission also includes a rationale outlining the need for these provisions. The submission states that the main findings of the survey was the need for a large community resource centre and shared open spaces to form part of the regeneration and future development of Ballyjamesduff. The submission states that the Percy French Hotel would be a suitable location for some of the desired facilities.

Chief Executive's Opinion on Issues Raised

The Draft plan will aim to develop sustainable communities and promoting a high quality of life for all people of Cavan by leading economic and community development and ensuring a supportive physical and social infrastructure is developed. The Draft Plan will strengthen policy on public realm for open spaces, streets and areas enjoyed by the public, and support the development and implementation of schemes on a county wide basis. This should include enhancements in existing areas. The creation of qualitative public spaces and safe and attractive spaces will be important in designing the public realm.

Chief Executive's Recommendation

The importance of community facilities and open space provision in the County is recognised. Policies and objectives to support the provision of community facilities and open space in the County will be explored during the plan making process.

3.7 Cootehill Submissions

This section contains a summary of the written submissions received as part of the Pre Draft consultation phase, relating to Cootehill. The opinions and recommendations of the Chief Executive to the issues raised within are also included.

No. 61: Submission from Cootehill Area Development Ltd, C/o Malachy Magee

The submission relates to Cootehill Town. The submission contains a wide range of suggestions relating to the regeneration and future development of Cootehill Town.

It gives an overview of the existing infrastructure and current enterprise and economic development in the town, listing the main locations for enterprise, industry and employment in the Cootehill area. It gives a fleet of suggestions for future development, noting specific elements and benefits for each proposal. It also notes detailed specific objectives for inclusion in the Draft Plan relating to economic development.

The submission highlights the importance of connectivity and coordination as central to infrastructure planning for a sustainable future. It notes that priority capital and social infrastructural projects in transport, energy, heritage, tourism, broadband and housing must be co-ordinated and supported with sufficient government capital investment across county boundaries to bring connectivity up to acceptable standards so we can complete successfully with other regions in Europe.

The submission requests that the future development of the East West Strategic Route corridor must remain an important objective in the Region. It is noted that this route and link roads has the potential to enable major economic growth along the route corridor, whilst providing strong connectivity and increased tourism while linking Ireland's Ancient East & The Wild Atlantic Way if capital funding can now be allocated to help mitigate the uncertain impact of Brexit to our Border region now and in the future.

The submission notes the need to drive Regional Economic Development across the region and encourage investment and planning that reflects regional differentiations in a variety of areas

The submission also gives an account of existing community facilities and amenities in the area, noting potential detailed development of same.

The submission outlines the tourism potential of Cootehill with particular reference to walking tourism and angling. Once again a number of requests for future tourism development form part of this submission.

Chief Executive's Opinion on Issues Raised

Specific comments relating to Cootehill are noted and will be considered during the preparation of the Draft Plan. A key theme in the plan review is the sustainable renewal of our towns and villages and the Draft Plan will address this matter in considerable detail. The Draft Plan will develop sustainable communities and promote a high quality of life for the people of Cavan by leading economic and community development and ensuring a supportive physical and social infrastructure is developed. Climate Change comprises of a central cross-cutting theme which will permeate all aspects of the Draft Plan. The Draft Plan will include objectives and policies to

address climate change and promote sustainable settlement. Quality of life factors and place-making are increasingly recognised as key to developing attractive places in which to invest, live, visit and work, including access to amenities, facilities, arts, culture and heritage. The Draft Plan will encourage appropriate residential, social and community uses within the County to enhance the vitality and viability of the County, in accordance with the principles of good design and to add quality to the places where people live and work. The Draft Plan will strengthen policy on public realm for open spaces, street and areas enjoyed by the public and support the development and implementation of schemes on a county wide basis. This should include enhancements in existing areas and incorporation into new schemes. The creation of qualitative public spaces and safe and attractive spaces will be important in designing the public realm within development. The Council recognises the important role that new and diverse tourist attractions can play in enhancing Cavan's tourism sector and the role it has in the creation of revenue for the County.

Chief Executive's Recommendation

Sustainable Communities and place-making, including creating attractive places for people to invest, live, work or visit are core themes of the Draft Plan and accordingly will be explored in individual chapters in the Plan. The policies and objectives in the existing County Development Plan relating to issues such as design, layout, open space, height etc will be reviewed during the preparation of the Draft Plan. The Draft Plan will strengthen policies on public realm for open spaces, street, etc and support the development and implementation of improvement schemes on a county wide basis. The Draft Plan will support the appropriate provision of physical and social infrastructure. Strong emphasis will be placed on renewable energy, and in this regard the Draft Plan will include a clear policy strategy regarding the provision and use of renewable energy initiative within the County. Appropriate strategic policies and objectives will be explored for the Draft Plan to consolidate the County's tourism sector and support attractions.

No. 62: Submission from Cootehill Area Development Ltd c/o Malachy Magee

This submission was made by Malachy Magee. The submission requests the provision of Gas Pumps for large articulated lorries. The submission notes this facility would be an advantage to the region.

Chief Executive's Opinion on issues raised

The issues raised in relation to the need for alternative fuels infrastructure is noted.

Chief Executive's Recommendation

That the draft Development Plan includes policies and objectives that supports the provision and expansion of infrastructure for alternatives fuels in the County.

No. 63: Submission from Cootehill Area Development Ltd c/o Russell McCabe

The submission relates to Cootehill's economic activity and development. The submission states that relative to the population size of Cootehill, a large number of manufacturing jobs are based in the town with much of the output exported. The significant value that these diverse manufacturing businesses make to the economy is noted.

The submission notes that local farmers are increasing milk production and that there is a large concentration of pig and poultry production in the area and that large quantities of manures are transported out of the area by road at a significant cost. It is further noted that these animal manures have potential to be converted into biogas which could be injected into the natural gas pipeline. The submission notes a number of benefits of an injection point to the gas network line in Cootehill. It further notes that ambitious national targets have been set for the transition to electric powered vehicles and the level of commuting to Cootehill at present. The submission states that it is essential that the provision of fast electric vehicle charging facilities relate to total vehicle use in the area and not limited to local population numbers.

The submission also notes the full extent of land owned by Cavan County Council zoned for industrial development in Cootehill appears to be only partly zoned. The submission states that it is critical that all industrial zones are listed in the plan with updated maps.

Chief Executive's Opinion on issues raised

The promotion of economic development in Cavan is a key corporate goal of Cavan County Council. The challenge for Cavan is to create more jobs within the County so that more people who live in Cavan can work in Cavan, and that the County is seen not only as a place to visit and live in, but also to invest and work in. The Draft Plan will seek to continue to support and facilitate economic development at appropriate locations throughout the County. The Draft Plan will seek to work collaboratively with key stakeholders and businesses to achieve this goal. The location of zoned employment uses throughout the County will be reviewed as part of the Draft Plan. Specific comments relating to the provision of infrastructure are noted and will be considered during the preparation of the Draft Plan.

Chief Executive's Recommendation

The Council will aim to ensure there is adequate supply and mix of employment lands at suitable locations throughout the County. The Draft Plan will support the continuing viability of agriculture and other rural based enterprises within rural areas in a controlled and sustainable manner. Having regard to the importance of reducing the carbon footprint, cognisance should be given to the inclusion of dedicated Electrical Vehicle charging points through appropriate objectives within the Draft Plan.

No. 64: Submission from Cootehill Town Team

The submission references and highlights a number of policies in the *Cootehill Revitalisation Plan 2018*. The policies that are highlighted relate to physical fabric of the town, infrastructure, access, car parking, amenity/recreation provision/public spaces and environmental issues. The submission notes there is evidence of greater integration and acceptance of different groups in the town.

Chief Executive's Opinion on Issues Raised

Specific comments relating to Cootehill are noted and will be considered during the preparation of the Draft Plan. A key theme in the plan review is the sustainable renewal of our towns and villages and the Draft Plan will address this matter in considerable detail. The Draft Plan will develop sustainable communities and promote a high quality of life for the people of Cavan by leading economic and community development and ensuring a supportive physical and social infrastructure is developed. Quality of life factors and place-making are increasingly recognised as key to developing attractive places in which to invest, live, visit and work, including access to amenities, facilities, arts, culture and heritage. The Draft Plan will strengthen policy on public realm for open spaces, street and areas enjoyed by the public and support the development and implementation of schemes on a county wide basis. This should include enhancements in existing areas and incorporation into new schemes. The creation of qualitative public spaces and safe and attractive spaces will be important in designing the public realm within development.

Chief Executive's Recommendation

Sustainable Communities and place-making, including creating attractive places for people to invest, live, work or visit are core themes of the Draft Plan and accordingly will be explored in individual chapters in the Plan. The policies and objectives in the existing County Development Plan relating to issues such as design, layout, open space, height etc will be reviewed during the preparation of the Draft Plan. The Draft Plan will strengthen policies on public realm for open spaces, street, etc and support the development and implementation of improvement schemes on a county wide basis. The Draft Plan will support the appropriate provision of physical and social infrastructure.

No. 65: Submission from Cootehill Chamber

Overall the submission requests that Cootehill is promoted as a prosperous and thriving local development service town, where the principles of environmental, economic and social sustainability, including the protection of our natural and built heritage are prevalent. It is also requested that Cootehill be promoted as a key industrial centre and a strategic location within the border region. The submission contains an overview of Cootehill's current role, service provision and amenity function. The submission requests that consideration be given to the zoning of additional lands for strategic industrial development to facilitate the continued growth of employment generating opportunities. The submission outlines a number of requests relating to the town's designation and role, physical and social infrastructure, economic and enterprise development, regeneration, amenity facilities, heritage and tourism offer and potential. The submission details specific points for each proposal including a rationale as to why each should be included.

Chief Executive's Opinion on Issues Raised

Specific comments relating to Cootehill are noted and will be considered during the preparation of the Draft Plan. A key theme in the plan review is the sustainable renewal of our towns and villages and the Draft Plan will address this matter in considerable detail. The Draft Plan will develop sustainable communities and promote a high quality of life for the people of Cavan by leading economic and community development and ensuring a supportive physical and social

infrastructure is developed. Quality of life factors and place-making are increasingly recognised as key to developing attractive places in which to invest, live, visit and work, including access to amenities, facilities, arts, culture and heritage. The Draft Plan will encourage appropriate residential, social and community uses within the County to enhance the vitality and viability of the County, in accordance with the principles of good design and to add quality to the places where people live and work. The Draft Plan will strengthen policy on public realm for open spaces, street and areas enjoyed by the public and support the development and implementation of schemes on a county wide basis. This should include enhancements in existing areas and incorporation into new schemes. The creation of qualitative public spaces and safe and attractive spaces will be important in designing the public realm within development. The Council recognises the important role that new and diverse tourist attractions can play in enhancing Cavan's tourism sector and the role it has in the creation of revenue for the County.

Chief Executive's Recommendation

The Draft Development Plan will seek to continue to support and facilitate economic development at appropriate locations throughout the County. The Core Strategy will set out a medium to longer term strategy for the spatial development of the County identifying the quantum, location and phasing of proposed development. Sustainable Communities and place-making, including creating attractive places for people to invest, live, work or visit are core themes of the Draft Plan and accordingly will be explored in individual chapters in the Plan. The policies and objectives in the existing County Development Plan relating to issues such as design, layout, open space, height etc will be reviewed during the preparation of the Draft Plan. The Draft Plan will strengthen policies on public realm for open spaces, streets, etc and support the development and implementation of improvement schemes on a county wide basis. The Draft Plan will support the appropriate provision of physical and social infrastructure. The Draft Plan should continue to promote walking and cycling through the provision, upgrading and maintenance of cycleways and footpaths as resources allow; and ensure that connectivity is provided in new developments with the provision of good pedestrian and cycle network and facilities. Appropriate strategic policies and objectives will be explored for the Draft Plan to consolidate the County's tourism sector and support attractions.

No. 66: Submission from Margaret Hartnett on behalf of Cootehill Senior Citizens

This submission relates to Cootehill town and requests the following:

- Repair and maintenance of footpaths
- Provision of a theatre and arts space
- Carry out maintenance and improvements works to the old graveyards at Church Street and Drumnaveil
- Maintenance of a playground in Church Street
- Provision of social affordable housing and private housing developments.

The submission outlines the benefits of each request.

Chief Executive's Opinion on Issues Raised

Quality of life factors and place-making are increasingly recognised as key to developing attractive places in which to invest, live, visit and work including access to amenities, facilities, arts, culture and heritage. The Draft Plan will encourage appropriate residential, social and community uses within the County to enhance the vitality and viability of the County, in accordance with the principles of good design and to add quality to the places where people live and work.

The Draft Plan will include an evidence based Core Strategy which places a statutory obligation on planning authorities to ensure that sufficient land is zoned to meet housing requirements over the plan period.

Policies and objectives within the Draft Plan will be in accordance with the findings of the Housing Strategy and it is recommended that they seek to appropriately address the housing requirements in the County. The Housing Strategy is required to provide for different housing needs, including social and affordable housing, sheltered housing and housing for persons with disabilities and the elderly.

Chief Executive's Recommendation

Sustainable Communities and place-making, including creating attractive places for people to invest, live, work and visit are core themes of the Draft Plan and accordingly will be explored in individual chapters in the Plan.

The Draft Plan will promote the provision of affordable and social housing and will support the fulfilment of this housing need on residentially zoned lands.

No. 67: Submission from Cootehill Harps A.F.C.

The submission requests the provision of adequate footpaths and lighting at Claragh Lane where Cootehill Harps is located. The submission contains an overview of the club's history, its 200 members and users. It notes this facility is the regional base for the Emerging Talent Programme, in addition to many local groups, schools including those with special needs. The submission notes the club's safety concerns for their members and users.

Chief Executive's Opinion on Issues Raised

Specific comments relating to infrastructure at Claragh Lane are noted and will be considered during the preparation of the Draft Plan.

Chief Executive's Recommendation

The Draft Plan will promote the development of sports and recreational facilities. The Draft Plan will implement a programme to upgrade roads and road improvements schemes.

No. 68: Submission from John and Lisa Morehart on behalf of Bellamont Forest Demesne

This submission was made by John and Lisa Morehart on behalf of Bellamont Forest Demesne.

The submission gives a full description of Ballamont Forest Demesne and includes extracts from various books and writers about the forest demesne. The submission requests that the entire property is designated and preserved as an ecological corridor and network vital to the migration, dispersal and genetic exchange of wild species as per County Cavan NHEP 12. Reference is also made to “The National Survey of Native Woodlands 2003-2008 Main Report” which recommends that the sites in the north midlands be reviewed with regards to the possibility of expanding the Statutory Reserves network, as they have no designated woodlands.

The submission also notes that Bellamont Forest, in combination with Dartrey/Fairfield and Black Island, should be classified as a Special Area of Conservation. It notes that Bellamont and Dartrey have been closely linked for over 300 years and this new designation will provide landscape connection for long-term preservation of an important natural corridor of lakes, woodland, wildlife and heritage landscape. It is stated that large sections of these lands are under state forestry plantations and need protection against clear fell in favour of continuous cover forestry. It is further stated that the sitka monoculture plantations should be brought back to semi-native woodlands with varied density, canopy heights, open space, and understory encouraging structural integrity to support a diverse wildlife habitat.

The submission request that full support of Cavan County Council in protecting this area of Cootehill with regulatory oversight for various categories of protection as outlined in the submission.

The submission notes it is essential for the full protection of the fresh water lakes, biodiversity of wildlife and aquatic habitat, built heritage and Irish landscapes values for the benefits of the community and the future generations to come.

The submission contains photos and maps of the estates at various stages. A number of historical descriptions are also included in the submission.

Proposed Natural Heritage Area

The submission contains a map of the pNHA designation for Dromore Lakes. It is noted that Bellamont Forest Demesne is currently part of a Proposed Natural Heritage Site Dromore Lakes which is a group of 10 main inter-drumlin lakes plus several small areas of water stretching along the river Dromore between Cootehill and Ballybay. Areas of wet woodland and reed swamp and important areas of wildfowl population including whooper swans, great crested grebe and lapwings.

Conservation Plan

The following is requested as part of the Conservation Plan:

- Protect and conserve the timber, water resources, wildlife and topsoil for future generations
- Deliver landscape scale conservation
- Prioritise native wood and trees
- Plan for whole ecosystems and landscapes
- Plan with geographical and historical context

- Support vegetation communities that are under presented
- Support habitat for threatened species and endangered ecological communities
- Define natural and cultural heritage values, threats to those values
- Restore former coppice or coppice-with-standards woodland to active coppice management
- Restore a diverse structure of groundcover habitat, including abundant fallen timber that support small native mammals and a diversity of reptiles, frogs and invertebrates
- In conjunction with partners, create research and educational programs to support the restoration and protection of the biodiversity of woodland habitat and riparian zones.

The submission contains excerpts from the following:

Oslo Ministerial Decision: European Forest 2020, Vienna Resolution 4 – 2003 Conserving and enhancing forest biological diversity in Europe, Forestry Programme Ireland 2014-2020, National Survey of Native Woodlands 2003-2008 Volume 1, National Parks and Wildlife Services, Birdwatch Ireland's Forestry Study and Directive, Coillte public statements and extracts from the press on Irish Forestry.

Chief Executive's Opinion on Issues Raised

The protection, conservation and preservation of Heritage Sites is provided by a range of international guidelines, national legislation, statutory and non-statutory guidance. Special Areas of Conservation (SACs) are designated at EU and not local level. The policies and objectives contained within the current Development Plan will be examined in the context of effectiveness in ensuring the protection of integrity of heritage sites and the surrounding landscape while facilitating appropriate development in the area.

Chief Executive's Recommendation

The Draft Plan will continue to protect, conserve and manage the County's natural heritage. It is recommended that policies and objectives are included in the Draft Plan which seek to protect the County's Natural Heritage sites, designated SAC's, SPA's etc.

No. 69: Submission from Michael Mc Carey

This submission relates to the town of Cootehill. The submission puts forward a number of detailed proposals for the future development of the town in terms of physical and social infrastructure, amenity facilities and the spatial growth. A rationale is included as part of the submission for each request. The following is requested:

- Review of Cootehill town boundary. The submission states that the population assigned to "Cootehill Urban" is not representative of the wider town environment as it appears from the current maps a substantial number of housing estates and housing settlements are outside the current boundaries of both Cootehill Urban and Cootehill Rural. It is noted that current boundary reduces the true reflection of the population of Cootehill and the services needed for the area.
- Zone the whole site of the Cootehill Industrial Estate which is in the ownership of Cavan County Council as industrial to maximise the potential offering of the location and its intended purpose.

- Provision of an access road to the rear of Market Street, Cootehill to assist in reducing the necessity for delivery vehicles to park on the main street and restrict traffic movements through the town. The submission notes that this road could also provide additional car parking with pedestrian access links to Market Street.
- Ensure all future developments in the county make provision for accommodating and promoting designated walking and cycling routes.
- Provision of cycle lanes within the Cootehill urban area connecting the 4 schools, the GAA grounds, the soccer pitch and Halton's amenity as part of future developments.
- Provision of greenways between the Halton's Amenity area/Erica's Fairy Forest/Dartrey Forrest and Bellamont forest with links to the Bellamont forest entrances opposite St Michael's Church on the Station Rd and at the rear of the livestock mart on the Station Road.
- Explore the option of a greenway on the disused railway line from Cootehill to Ballybay.

Chief Executive's Opinion on Issues Raised

The Draft Plan will encourage appropriate residential, social and community uses within the County to enhance the vitality and viability of the County, in accordance with the principles of good design and to add to quality to the places where people live and work. The Draft Plan will include a Core Strategy which places a statutory obligation on planning authorities to ensure that sufficient land is zoned to facilitate appropriate development within town boundaries over the plan period. Improvements to the roads across the County in terms of upgrades, realignments, repairs, traffic management measures and traffic calming should be assessed and implemented as deemed necessary and as resource allow. The Draft Plan should continue to promote walking and cycling through the provision, upgrading and maintenance of cycleways and footpaths as resources allow; and ensure that connectivity is provided in new developments with the provision of good pedestrian and cycle network and facilities.

Chief Executive's Recommendation

The Draft Plan will incorporate an evidence based Core Strategy which will set out a medium to longer term strategy for the spatial development of the County identifying the quantum, location and phasing of proposed development. The Draft Development Plan will implement a programme of upgrade roads and road improvement schemes. The Draft Plan will facilitate and support the development of Cavan as a premier location for outdoor recreational activities including walking and cycling.

No. 70: Submission from John Mc Carey

- Review of Cootehill town boundary. The submission states that the population assigned to "Cootehill Urban" is not representative of the wider town environment as it appears from the current maps a substantial number of housing estates and housing settlements are outside the current boundaries of both Cootehill Urban and Cootehill Rural. It is noted that current boundary reduces the true reflection of the population of Cootehill and the services needed for the area.

- Zone the whole site of the Cootehill Industrial Estate which is in the ownership of Cavan County Council as industrial to maximise the potential offering of the location and its intended purpose.
- Provision of an access road to the rear of Market Street, Cootehill to assist in reducing the necessity for delivery vehicles to park on the Main Street and restrict traffic movements through the town. The submission notes that this road could also provide additional car parking with pedestrian access links to Market Street.
- Ensure all future developments in the county make provision for accommodating and promoting designated walking and cycling routes.
- Provision of cycle lanes within the Cootehill urban area connecting the 4 schools, the GAA grounds, the soccer pitch and Halton's amenity as part of future developments.
- Provision given for the completion of defined and segregated footpaths within the Cootehill area radiating from the town core, where significant gaps remain with un-defined non-segregated pedestrian paths that connect to areas further out from the town core.
- Provision of greenways between the Halton's Amenity area/Erica's Fairy Forest/Dartrey Forest and Bellamont forest with links to the Bellamont forest entrances opposite St Michael's Church on the Station Rd and at the rear of the livestock mart on the Station Road.
- Explore the option of a greenway on the disused railway line from Cootehill to Ballybay.
- Target and promote low cost road safety measures on regional roads to enhance the network of regional roads connecting the main towns in the County and links to National Primary Roads within the county.
- Include an objective to better assist in a change of zoning associated with the consenting of disposal sites (Certificate of Registration = >less than 25,000m³) for disposal of inert/non-hazardous naturally occurring excavated arising from local construction activities, to support construction and development within the County.

Chief Executive's Opinion on Issues Raised

The Draft Plan will encourage appropriate residential, social and community uses within the County to enhance the vitality and viability of the County, in accordance with the principles of good design and to add to quality to the places where people live and work. The Draft Plan will include a Core Strategy which places a statutory obligation on planning authorities to ensure that sufficient land is zoned to facilitate appropriate development within town boundaries over the plan period. Improvements to the roads across the County in terms of upgrades, realignments, repairs, traffic management measures and traffic calming should be assessed and implemented as deemed necessary and as resource allow. The Draft Plan should continue to promote walking and cycling through the provision, upgrading and maintenance of cycleways and footpaths as resources allow; and ensure that connectivity is provided in new developments with the provision of good pedestrian and cycle network and facilities.

Chief Executive's Recommendation

The Draft Plan will incorporate an evidence based Core Strategy which will set out a medium to longer term strategy for the spatial development of the County identifying the quantum, location and phasing of proposed development. The Draft Development Plan will implement a

programme of upgrade roads and road improvement schemes. The Draft Plan will facilitate and support the development of Cavan as a premier location for outdoor recreational activities including walking and cycling

No. 71: Submission from the Aisteoirí Muinchille Drama Group

The group would like to see a purpose-built theatre in Cootehill or a pre existing structure adopted for such use. This submission outlines the benefits that such a use would bring to Cootehill which include

- Essential for community and makes Cootehill more desirable place to live and improve leisure facilities in town
- Eliminates travel to other areas
- Attract investment and employment
- Improve mental health and general wellbeing.
- Improves tourist offer in Cootehill
- Can have multifunctional use - theatre, rehearsal, cross border, climate change, heritage use

Chief Executive's opinion on issues raised

The issues raised in relation to the need for a purpose built facility for Arts in Cootehill are noted.

The draft plan will include policies, objectives and zoning throughout the County to support the provision of community and arts facilities. The importance of community and arts facilities in the County is recognised and it will be essential to protect and expand such facilities through appropriate policies and objectives. Appropriate community and arts use within the County to enhance the vitality and viability of towns and villages is in accordance with principles of proper planning and sustainable development and will add quality to the places where people live and work.

Chief Executives Recommendations

Sustainable Communities including creating attractive places to live, work and visit are core themes of the Draft Plan and will be included in individual chapters in the Plan.

That land uses, policies and objectives are included in the towns and villages of the County that support Arts Space/Theatre use.

3.8 Belturbet Submission

This section contains a summary of the written submission received as part of the Pre Draft consultation phase, relating to Belturbet. The opinions and recommendations of the Chief Executive to the issues raised within are also included.

No. 72: Submission from Tommy Mc Mahon

This submission requests the following:

Development of a Rowing Club and Clubhouse on vast Quivvy waters. Provide access to Erne river and Castlesaunderson.

Provision of an Anaerobic Digester new concentrated slurry areas.

Develop themes for each town and village.

Provision of electronic information/displays for all activities in each area.

Provision of a tennis court for Belturbet.

Chief Executive's Opinion on Issues Raised

The Draft Plan will aim to deliver a high quality of life for the people of Cavan by leading economic and community development and ensuring a supportive physical and social infrastructure is developed. The social, community and economic benefits from improving the tourism and recreational offer within the County is recognised and acknowledged. The development of such facilities will be promoted in the Draft Plan. Specific comments made relating to infrastructure are noted and will be considered during the preparation of the Draft Plan. The Draft Plan will promote the growth and vibrancy as appropriate of each town and village throughout the County. The Draft Plan will aim to deliver a high quality of life for the people of Cavan by leading economic and community development and ensuring a supportive physical and social infrastructure is developed.

Chief Executive's Recommendation

Policies and objectives to support the provision of tourism, amenity and recreational facilities in the County will be explored during the plan making process. The Draft Plan will enhance the vitality and viability of towns and villages throughout the County, in accordance with the principles of good design and to add quality to the places where people live, work and visit.

3.9 Shercock Submissions

This section contains a summary of the written submissions received as part of the Pre Draft consultation phase, relating to Shercock. The opinions and recommendations of the Chief Executive to the issues raised within are also included.

No. 73: Submission from Sean Carolan

The submission relates mainly to the town of Shercock and contains a number of suggestions to improve the amenity offer in the town. The submission requests the following for the Shercock and general Cavan area:

- Better connect Shercock town and Lough Sillan.

- Invest in a small marina and boardwalks.
- Invest in marketing and promoting local heritage.
- Create dedicated walking and cycling routes in the Sherlock area

The submission outlines the benefits such requests would bring.

Chief Executive's Opinion on Issues Raised

The social, community and economic benefits from improving the tourism and recreational offer within the County is recognised and acknowledged. The development of such facilities will be promoted in the Draft Plan.

Chief Executive's Recommendation

Policies and objectives to support the provision of tourism, amenity and recreational facilities in the County will be explored during the plan making process.

No. 74: Submission from John Greenan

This submission relates to Shercock and the provision of footpaths. The submission requests the completion of the footpaths along the Carrickmacross Rd to be a priority and notes by this is required. Included as part of the submission is a google earth image indicated with a blue line where the paths are required.

Chief Executive's Opinion on Issues Raised

Specific comments relating to the provision of infrastructure are noted and will be considered during the preparation of the Draft Plan.

Chief Executive's Recommendation

Policies and objectives to support the provision of necessary infrastructure will be explored during the plan making process.

3.10 Killeshandra Submissions

This section contains a summary of the written submissions received as part of the Pre Draft consultation phase, relating to Killeshandra. The opinions and recommendations of the Chief Executive to the issues raised within are also included.

No. 75: Submission from Alice O Dowd

This submission relates specifically to Killeshandra. The submission requests the provision of various physical and social infrastructure for the town. A rationale supporting each request is included as part of the submission. The submission requests the following:

- Link a community garden to the back of the community centre.
 - Acquire Colelett's Bar, extend the retirement village and link to new community garden.
- The submission contains a rationale supporting this suggestion.

- Develop a shorter loop walk accessible for wheelchair users and buggies from the forest to the shore of the lake. Carve the upturned trees into art forms, fairies, or flowers.
- Insert water fountains along the main street where original water taps were present. The submission make reference to these in Italy and France.
- Develop a cycle vending machine in the town. A link is provided with further information cycling vending machines.
- The submission includes a suggestion and route to expand the cycle loop and lake walk.
- It is requested that concrete or large paving be used for footpaths.
- The submission notes that a cow parade on display in the town would be amazing.

On a countywide basis the submission notes that it would be great to see a spin off from the cartoon industry and gives reasons for same. The submission also notes that there are fantastic industries in Cavan.

Chief Executive's Opinion on Issues Raised

Sustainable communities and place-making, including creating attractive places for people to invest, live, work and visit are core themes of the Draft Plan and accordingly will be explored in individual chapters of the Plan. The Council will support measures that address the needs of communities within the County and will seek to provide the basis for a more socially inclusive society which promotes participation and access for all. The Draft Plan should continue to promote walking and cycling through the provision, upgrading and maintenance of cycleways and footpaths as resources allow.

Chief Executive's Recommendation

The Draft Plan will facilitate and support the development of Cavan as a premier location for outdoor recreational activities including walking and cycling. Policies and objectives to support the provision of community facilities in the County will be explored during the plan making process.

No. 76: Submission from Alice O Dowd No. 2

The submission outlines a number of recreational/amenity provisions that would benefit Killeshandra, including a place of reflection and a green way. The submission includes further details regarding same.

Chief Executive's Opinion on Issues Raised

Sustainable communities and place-making, including creating attractive places for people to invest, live, work and visit are core themes of the Draft Plan and accordingly will be explored in individual chapters of the Plan. The Council will support measures that address the needs of communities within the County and will seek to provide the basis for a more socially inclusive society which promotes participation and access for all. The Draft Plan should continue to promote walking and cycling through the provision, upgrading and maintenance of cycleways and footpaths as resources allow

Chief Executive's Recommendation

The Draft Plan will facilitate and support the development of Cavan as a premier location for outdoor recreational activities including walking and cycling. Policies and objectives to support

the provision of community facilities in the County will be explored during the plan making process.

3.11 Ballyhaise Submission

This section contains a summary of the written submission received as part of the Pre Draft consultation phase, relating to Ballyhaise. The opinions and recommendations of the Chief Executive to the issues raised within are also included.

No. 77: Submission from Terry Hyland Estate Agents Ltd

This submission relates to the public sewage at Ballyhaise. It is requested that the public sewage line be extended to incorporate areas such as: the Antiduff road, the road past Loughtee Drive, Annalee Drive leading to Owley, the quarry road at Townparks and various others. The submission notes that such an extension will aid the future development and sustainability of Ballyhaise Village as a suburb of Cavan town.

Chief Executive's Opinion in Issues Raised

Specific comments made relating to infrastructure are noted and will be considered during the preparation of the Draft Plan.

Chief Executive's Recommendation

Policies and objectives to support the provision of necessary infrastructure in conjunction with Irish Water will be explored during the plan making process.

3.12 Killinkere Submission

This section contains a summary of the written submission received as part of the Pre Draft consultation phase, relating to Killinkere. The opinions and recommendations of the Chief Executive to the issues raised within are also included.

No. 78: Submission from Killinkere Development Association

The submission commences with an acknowledgement from the association of the hugely positive role that Cavan County Council has played in helping rural parishes in terms of funding and grant support. Further reference is made to the particular programmes.

Village Status

It is noted that Killinkere is not currently designated as a village centre or core. Details are included of the two main settlement areas within the parish and the high level of one off housing

development that has occurred in this area. It is further noted that such housing is financially not viable for many young people who want to move back to the parish.

The submission states that Killinkere Development Association would like to formulate a spatial strategy in consultation with Cavan County Council whereby zoning for housing clusters/clachans can be developed which encourages the development of village style settlement in both areas of the parish. Specifics regarding affordability, sustainability and overall benefits of such a strategy for the local community are included as part of the submission. In addition, the submission also included a list of other elements to compliment the residential element.

Redrawing of Municipal District Boundaries

The submission explains that currently the townlands of Doon and Annaharnett are technically in the parish of Mullagh although residents use Killinkere's community and educational facilities. The submission states that when it comes to being represented at a Municipal District level these areas feel forgotten. This submission queries if there is scope to adjust the MD lines.

Kingspan

The following proposal is put forward as part of the submission: Cavan County Council to take a lead to trial the development of sustainable housing projects in our core towns in partnership with Kingspan noting the expertise within the company and the current housing crisis.

Chief Executive's Opinion on issues raised

The issues raised in the submissions are noted in relation to the Settlement Strategy and housing in urban and rural areas and will be brought forward into the Draft Plan. The Draft Plan will include an evidence based Core Strategy which places a statutory obligation on planning authorities to ensure that sufficient land is zoned to meet housing requirements over the plan period. The population targets, settlement hierarchy and densities for the County will be based on the NPF and the RSES.

Chief Executive's Recommendation

The Core Strategy will set out a medium to longer term strategy for the spatial development of the County identifying the quantum, location and phasing of proposed development.

The Draft Plan will also explore policies and objectives that seek to provide a mix of units, which are flexible in design and can adapt to the changing requirements of family life cycles.

Climate Change and sustainability are important challenges that must be addressed in the Draft Plan.

3.13 Drumgoon Submission

This section contains a summary of the written submission received as part of the Pre Draft consultation phase, relating to Drumgoon. The opinions and recommendations of the Chief Executive to the issues raised within are also included.

No. 79: Submission from Roseabby Mc Gorry

This submission relates to Drumgoon Hill Graveyard. The submission notes it is a medieval graveyard which is located on a Medieval Iron Age ringfort and highlights restoration work completed to date. It is requested that the roadway to the graveyard be resurfaced under the Laneway scheme. The submission notes the benefits this work would bring if completed, increased tourist numbers, etc.

Chief Executive's opinion on issues raised

The Council will continue to protect the County's heritage and will support sensitive appropriate development of same.

Chief Executive's Recommendation

It is recommended that policies and objectives are included within the Draft Plan which seek to protect, promote and enhance the County's built, natural and cultural heritage.

3.14 Bawnboy Submission

This section contains a summary of the written submission received as part of the Pre Draft consultation phase, relating to Bawnboy. The opinions and recommendations of the Chief Executive to the issues raised within are also included.

No. 80: Submission from Dymphna Headon, Secretary of Bawnboy Workhouse

This submission includes a statement of reasons why Bawnboy Workhouse should be included in the Development Plan with reference to supporting policies and objectives in the Cavan County Development Plan 2014-2020. A Feasibility Study outlining the future use of Bawnboy Workhouse complex is also included as part of the submission.

Chief Executive's opinion on issues raised

The issues raised in relation to the need for sustainable development of Bawnboy Workhouse is noted. It is important that the draft County Development Plan provides an appropriate policy context to facilitate the provision of suitable alternative uses for our Architectural Heritage of the County. As a protected structure, it is also important that the draft County Development Plan provides appropriate policy for the appropriate care and use of these structures.

There is clearly a great deal of support for the conservation, protection and promotion of the built heritage within the County. The Council will continue to protect the context of such places and will support sensitive appropriate development of places of heritage.

Chief Executive's Recommendation

That the draft Development Plan provides appropriate policies for the facilitation of services to communities.

That the draft development plan protects the natural and built heritage and encourages appropriate uses/reuse of same. It will further ensure that the natural and built heritage of the County is safeguarded for future generations.

3.15 Killygarry Submission

This section contains a summary of the written submission received as part of the Pre Draft consultation phase, relating to Killygarry. The opinions and recommendations of the Chief Executive to the issues raised within are also included.

No. 81: Submission from Tom Brady

This submission relates to the Killygarry area of Cavan and requests the extension of the 50 kilometres per hour speed limit on the N3 road from the roundabout at Liberty Insurance to the junction of the L6510 Aghalacken Road, in addition to the double white line to prohibit overtaking on this stretch. The submission gives a detailed account of the heavy traffic flows and local facilities on this section of the road and notes this request would have a significant contribution to the safety of all road users whilst have minimal impact on traffic movement.

Chief Executive's Opinion on Issues Raised

The issues raised in relation to road infrastructure is noted and will be taken into consideration during the preparation of the Draft Plan. Improvements to the roads across the County in terms of upgrades, realignments, repairs, traffic management measures and traffic calming should be assessed and implemented as deemed necessary and as resource allow.

Chief Executive's Recommendation

The draft plan will incorporate supportive policies and objective to support the upgrading and development of the County's national, regional and local road infrastructure.

3.16 Redhills Submission

This section contains a summary of the written submission received as part of the Pre Draft consultation phase, relating to Redhills. The opinions and recommendations of the Chief Executive to the issues raised within are also included.

No. 82: Submission from Johnny O'Hanlon & PJ Dunne

This submission relates to small communities and requests that consideration be given to include Killoughter as a Small Village in the settlement hierarchy. The submission outlines a justification for same including the following:

General

The submission references the Town & Villages section of the *Strategic Issues Paper* and notes villages like Redhill/Killoughter are recognised as providers of essential services. The submission notes Redhill's designation in the current plan and further notes that Redhill village is served by a church, school and community hall which are all located in Killoughter. It is stated that Killoughter functions as a community and educational centre for Redhills.

Small Village Development

The submission notes that as per the 2014-2020 development "*Small Villages*" are to be regarded as suitable for mixed use development including residential and care homes/primary care facilities. It is further stated that it is the policy of the Planning Authority to consider such a development if it would not contravene the stated policies of the Development Plan for the area.

Utilities

The submission notes that Killoughter is served by a group water scheme and Redhill is served by a group water scheme and a wastewater treatment plant.

Residential

The submission outlines that there are 21 existing houses in Killoughter which has been a focus for the organic residential growth of the general Redhills/Killoughter community. It is also noted that this residential base supports the services and amenities in this area.

Community Hall

The submission notes that there is no Community facility in Redhills and states that the community centre at Killoughter services both Redhill and Killoughter. The submission outlines the uses of this hall and notes a completed refurbishment programme in 2002 of €300,000 which it is stated conveys the confidence of the local authority in the strength and sustainability of the community. The submission also notes that the village is serviced by the local rural transportation scheme's bus service.

Church

The submission states that the church in Killoughter provides further strengthening of community identity and further enhances the village's inclusion of the Killoughter area as part of an expanded small village destination.

The submission includes a summary of the facilities and amenities available in Killoughter supporting its warrant for consideration as a small village.

Chief Executive's Opinion on issues raised

The Draft Plan will include an evidence based Core Strategy which places a statutory obligation on planning authorities to ensure that sufficient land is zoned to meet housing requirements

over the plan period. The population targets, settlement hierarchy and densities for the County will be based on the NPF and the RSES.

Chief Executive's Recommendation

The Core Strategy will set out a medium to longer term strategy for the spatial development of the County identifying the quantum, location and phasing of proposed development.

3.17 West Cavan Submissions

This section contains a summary of the written submissions received as part of the Pre Draft consultation phase, relating to West Cavan. The opinions and recommendations of the Chief Executive to the issues raised within are also included.

No. 83: Submission from Save West Cavan Group c/o Francis Cassidy

This submission gives a substantial overview and outlines of negative impact forestry can have on an area like West Cavan including: decline in families, landscape blighting, blocking of daylight, absentee landlords, biodiversity and carbon sinks.

The submission highlights the good efforts of Cavan County Council in regard to forestry, the environment, tourism and sustainability in the last development plan. The submission requests that the council provide greater safeguards and follow up by ensuring compliance. Stronger language in policies and objectives is also requested to ensure these communities are aware that Cavan County Council fully support and encourage them.

The submission also includes a paragraph on the Geopark. It is notes that we need an emphasis placed on native trees which are in keeping with the aims and objectives of the park. The submission notes that the objectives of CCC in NHEO12 and the current forest practice are not in line with objectives concerning the Geopark. It is requested that greater vigilance is required and more emphatic language in the policy and objectives is necessary.

Invasive Species

The submission states invasive non-native plant and animal species are a major threat to biodiversity and notes that invasive species may be spread during excavation and construction works. The submission highlights relevant policies and objectives. It notes that the tree planting that has happened in West Cavan is either at variance with the current biodiversity strategy, inappropriate in scale and character, planted on unsuitable soils (peat which will not be able to be replanted) or in breach of environmental regulation. It is requested that only native trees be allowed in West Cavan and outlines specific changes that are required to relevant policies and objectives. The submission also notes that it is now recognised that the cumulative effects of afforestation can have negative effects on water quality and impact negatively on river plant and species life. It is requested that further strengthening is required.

Natural Heritage and Environment

The submission states Cavan County Council's mission statement and requests that further consolidation of NHEP 1, 2 and 3 is required to prevent further erosion of the quality of life and the potential to enjoy the countryside.

Natural Heritage and Environment Policies

The submission includes NHEP1, NHEP 2 and NHEP 3 and notes that it was previously indicated to bring afforestation into the planning process under the direction of Minister Barry Cowan. The submission further notes that if this policy shift were to continue under the new minister, this would require Cavan County Council to resist developments (Blanket monoculture) that could have a negative impact and promote developments that maximise the social, economic and environmental benefits.

The submission also requests that Cavan County Council to engage with the local communities of West Cavan through their own services and the auspices of the Geopark in creating a greater

understanding of Biodiversity. It is noted that by reinforcing NHEP 4, 5, 6, 7 and 8 we can discourage further monoculture projects and promote projects that meet biodiversity objectives which strengthen the links of communities with the environment and further enhance the visual appearance of the landscape.

Natural Heritage Policies

The submission contains the following policies: NHEP4, NHEP5, NHEP6, NHEP7 and NHEP 8.

European Sites (Natura 2000)

The submission notes that further safeguards are needed to the policy and objectives surrounding the Natura 2000 sections of the new plan to prevent unwelcome impacts by afforestation in or adjacent to these special areas.

Landscape and Amenity Areas / Special Landscape Policy Areas

The submission notes that there is a strong case, if not an onus to evoke Section 10 (2) of the Planning Act 2000, to preserve this character given the threats and negative impact ribbon strips of forestry have from peak to glen across the hillsides and mountain sides. This area is distinct as reflected in Unesco designation and a further conservation role is imperative for its survival. The submission details NHEP 19, NHEP 20, NHEO 22, NHEO 23, NHEO 24 and NHEO 25. and further notes that the landscape west of Dernacrieve is in need of further conservation and protection.

Special Landscape Policy Areas

The submission notes the Areas of High Landscape Value or Special Landscape Interest and highlights the following areas that are of concern *Upper Areas West Cavan* and *Erne-Shannon Canal Corridor*.

County Heritage Sites

The submission requests that more policy objectives are included to create an area of exceptional heritage. The submission contains a list of County Heritage Sites and Landscape Character Areas and notes that due to the current Monoculture forestry model permeating the landscape of West Cavan has little positive to add to the scenic views. It is noted that the most destructive times are when clear felling occurs and swathes of view are blighted.

Water Quality and its protection

The submission notes that although the current County Development Plan recognises Agriculture as a threat to water quality, it does not attribute any risks to Forestry. The submission outlines a number of reasons why this is regrettable. The submission includes the following water protection policies: NHEP26, NHEP27, NHEP28. The submission notes that there are clear indicators available that in relation to Forest developments, the primary causes for appeal from interested conservation agencies are in relation to Water quality and threat to aquatic life. It is noted that the Department of Agriculture approved an application in West Cavan in 2019, where part of the development is on a marked flood plain. It is noted that some of the waters flow into the Erne system and therefore trans requires a greater level of scrutiny and accountability.

The submission outlines the beauty of the area and notes that the forestry model practiced here beside the Marble Arch Caves is not appropriate. The submission requests Cavan County Council to take a more active role in protecting its uniqueness.

Forestry Regulations

The submission provides a section on forestry regulations and encourages Cavan County Council to monitor all applications so that they conform with the objectives of good planning and are in adherence with EU regulations on habitats, water framework and birds direct.

The submission notes that afforestation should be avoided in sensitive habitats or areas of high ecological value or areas of high nature farming. The submission includes a map issued by Teagasc which predicts the imminent distribution designation of HNV land. The submission notes that The West Cavan area is ranked high, therefore the precautionary principle should apply and most of West Cavan should not be considered suitable for afforestation.

The submission notes that Section 40 requires environmental and ecological infrastructure to be considered in a coherent manner to achieve the environmental aims in relation to soil and water quality, biodiversity and ecosystems protection. The submission requests that in the absence of EIA or Appropriate Assessment screening reports that Cavan County Council be more proactive with regard to protecting the environment and ecology of our area. The submission further notes that despite the high prevalence of SAC, NHA, SPC in West Cavan there has been no forestry application which required an Environmental Impact Assessment.

The submission contains a table showing the levels of forest cover in West Cavan.

Chief Executive's Opinion on Issues Raised

The comments made in this submission are noted and will be given due consideration as part of the process of preparing the Draft Plan. Cavan is predominantly a rural county, a balance is required to be reached that seeks to protect the landscape and natural heritage of rural Cavan, whilst also promoting economic opportunities associated with rural life such as agricultural, horticultural, renewable technologies and rural-related economic uses. The protection, conservation, and presentation of the Heritage Sites is provided by a range of international guidelines, national legislation, statutory and non-statutory guidance. The policies and objectives of the current plan will be examined in the context of effectiveness in ensuring the protection of the integrity of Heritage Sites and their surrounding landscape while facilitating appropriate development of the area.

Chief Executive's Recommendation

The Draft Plan will support the continuing viability of agriculture, horticulture and other rural based enterprises within rural areas. Agriculture, forestry, equine and the extractive industry are other important rural resources with potential for development should only be considered in a controlled and sustainable manner.

It is recommended that policies and objectives are included within the Draft Plan which seek to protect the County's Built and Natural heritage sites, designated SAC's and SPA's etc.

No. 84: Submission made by West Cavan Bog Association

The submission makes reference to and quotes specific policy and points from the Regional Spatial and Economic Strategy for the Northern and Western Regional Assembly and states this policy relating to peatlands. The submission suggests the following:

- Cavan County Council to review its policy in relation to peatlands.
- Peatland areas in the townlands of Fartrin, Aughaweena and Clontygrigny are of very high regional importance, with accompanying area of lowland heath and fen supporting endangered species, specialist to these habitats.
- West Cavan Bogs Association to continue work with Geopark.
- Local Authorities water programme recognise the importance in conserving peatlands to alleviate water quality issues.
- That the continued drainage of bogs, adds to the fire risk of the region and notes that bogs should be wet.
- The EPA recognise the significant contribution of drained peatlands to GHG emissions.
- Cavan Council Council to seek advice from qualified hydrologists in relation to peatland areas, including road maintenance adjacent to peatland areas.
- Valuable areas such as Killywillin bog be integrated in planning.
- All peatland areas in west Cavan be mapped and considered with special care.

Chief Executive's Opinion on Issues Raised

The comments made in the submission are noted and will be considered as part of the preparation of the Draft Plan. The protection, conservation, and presentation of peatland areas is provided by a range of international guidelines, national legislation, statutory and non-statutory guidance. The policies and objectives contained within the current Development Plan will be examined in the context of effectiveness in ensuring the protection of peatland areas and the surrounding landscape while facilitating appropriate development in the area. The Draft Plan will continue to protect, conserve and manage the County's peatland areas.

Chief Executives Recommendation

It is recommended that policies and objectives are included within the Draft Plan which seek to protect the County's peatland areas in a sustainable manner.

Section 4: Future Process

4.0 Introduction

This section outlines the procedure following the issue of this Chief Executive's report.


4.1 Procedure following Chief Executives Report

The Chief Executives report shall issue to the Cavan County Council Elected Members for their consideration on 8th October 2020.

Not later than 10 weeks following receipt of this report, by 17th December 2020, the Members may issue strategic directions to the Chief Executive regarding the preparation of the draft Cavan County Development Plan 2022-2028. Any such directions must be strategic in nature and must take account of the statutory obligations of the Council and any relevant policies or objectives for the time being of the Government or of any Minister of the Government.

In issuing directions, the Members shall be restricted to considering the proper planning and sustainable development of the area to which the Development Plan relates.

No later than 12 weeks following receipt of strategic directions from the Members, the Chief Executive shall prepare a Draft Cavan County Development Plan for the period 2022-2028 and submit it to the Member's for their consideration.



Tommy Ryan
Chief Executive

Appendix One: List of submissions by Ref. No. & Name of Persons/Bodies

Number	Name
1.	Northern and Western Regional Assembly
2.	Office of the Planning Regulator
3.	Eastern and Midlands Regional Assembly
4.	Environmental Protection Agency
5.	Geological Survey Ireland, Department of Communications, Climate Action and Environment
6.	Office of Public Works
7.	Department of Culture, Heritage and the Gaeltacht
8.	Department of Defence
9.	Department of Education and Skills
10.	Department of Transport, Tourism and Sport
11.	Transport Infrastructure Ireland
12.	National Transport Authority
13.	Irish Water
14.	Failte Ireland
15.	Health Service Executive
16.	Inland Fisheries Ireland
17.	Leitrim County Council
18.	Meath County Council
19.	Cavan Monaghan Education and Training Board
20.	An Post
21.	Coillte
22.	Gas Networks Ireland
23.	Eirgrid
24.	ESB
25.	SSE
26.	Irish Wind Energy Association
27.	National Council for the Blind of Ireland
28.	Irish Wheelchair Association
29.	Cavan Sustainable Energy Group
30.	Roadstone Limited
31.	Keep Ireland Open
32.	SKRD Limited
33.	Cavan County Local Development
34.	Cavan Chamber
35.	Terry Argue AOR Insurances
36.	Bryan Gurhy
37.	John Gurhy
38.	Marietta O'Dowd
39.	Colette Bogue
40.	Edward O'Hanlon

41.	Tod Davis
42.	Philip Brady
43.	Bridget Booysen
44.	Niamh Brady
45.	Malachy and Felicity O'Brien
46.	Bart
47.	Ruth King
48.	Virginia Residents Facebook 1
49.	Virginia Development Association
50.	Kathleen Duffy
51.	James Kellett
52.	Edel Barry
53.	S Brady
54.	Cllr. Paddy Mc Donald
55.	Bailieborough Development Association
56.	Hugh Brady
57.	The Planning Partnership on behalf of Donal Clarke
58.	Anne Marie Smith
59.	Pat Connolly
60.	Ballyjamesduff Unity Group
61.	Cootehill Area Development Limited, c/o Malachy Magee
62.	Cootehill Area Development Limited, c/o Malachy Magee
63.	Cootehill Area Development Limited, c/o Russell Mc Cabe
64.	Cootehill Town Team
65.	Cootehill Chamber
66.	Margaret Hartnett on behalf of Cootehill Senior Citizens
67.	Cootehill Harps A.F.C.
68.	John and Lisa Morehart on behalf of Bellamont Forest Demesne
69.	Michael Mc Carey
70.	John Mc Carey
71.	Aisteoirí Muinchille Drama Group
72.	Tommy Mc Mahon
73.	Sean Carolan
74.	John Greenan
75.	Alice O'Dowd
76.	Alice O'Dowd
77.	Terry Hyland Estate Agents Limited
78.	Killinkere Development Association
79.	Roseabby Mc Gorry
80.	Dymphna Headon, Secretary of Bawnboy Workhouse
81.	Tom Brady
82.	Johnny O'Hanlon and PJ Dunne
83.	Save West Cavan Group
84.	West Cavan Bog Association